

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

of 44 Gresham Street, Geraldine

Proposed Subdivision Consent to the Timaru District Plan

STATEMENT OF EVIDENCE OF GLEN McLACHLAN

on behalf of **YEDO INVESTMENTS LTD**

INTRODUCTION

1. My full name is Glen McLachlan. I am a Licensed Cadastral Surveyor and Director at Davis Ogilvie (Aoraki) Ltd, based in Timaru.
2. I have over 23 years of experience in subdivision and land development, surveying and infrastructure planning sector.
3. I have been involved in the 44 Gresham Street project in relation to the subdivision layout, site-responsive design development, and coordination of surveying and civil engineering input associated with the proposed subdivision and rural residential development.

QUALIFICATIONS AND EXPERIENCE

4. I hold a Bachelor of Surveying from the University of Otago (2002).
5. I am a Licensed Cadastral Surveyor (LCS) and a Full Member of Surveying and Spatial New Zealand (S+SNZ).
6. My relevant experience includes:
 - subdivision layout and scheme design development
 - cadastral surveying and subdivision implementation
 - civil infrastructure coordination
 - site-responsive layout planning
 - access, servicing and stormwater integration
 - earthworks and development feasibility considerations
 - assisting with consent applications and supporting technical input

CODE OF CONDUCT

7. I confirm I have read and understand the Environment Court Code of Conduct for Expert Witnesses (2023).
8. I confirm the evidence I provide is within my area of expertise, and I have not omitted any material facts that could affect my conclusions.

SCOPE OF EVIDENCE

9. My evidence is brief and addresses the physical attributes of the site that influenced the subdivision layout, the way the subdivision design evolved over time, the extent to which the current layout responds to site constraints and opportunities, how the design responds at a practical level to matters such as access, stormwater, earthworks, staging and connectivity, and the way in which the layout reflects the design themes in the Timaru District Plan subdivision provisions.

10. I do not offer planning opinion on the overall merits of the application, nor do I address landscape, traffic or three-waters matters except where they informed the evolution of the subdivision layout.

SITE ATTRIBUTES AND DESIGN DRIVERS

11. The application site is located at 44 Gresham Street, Geraldine, and comprises approximately 17.41ha in area as shown on the Application Plan AP01G, dated 03/26. It consists of Lot 2 DP 68947, held in Record of Title CB45A/603, and Lot 2 LT 618007, created pursuant to RC 101.2022.71.2. I note that RC 101.2022.71.2 amended the earlier legal description by subdividing off the existing dwelling area formerly associated with Lot 3 DP 68947, please refer to the approved scheme plan for RC 101.2022.71.2 in **Appendix A** - attached. Upon completion of that consent and deposit of LT 618007, those parcels are to be amalgamated into one record of title, RT 1240687, which is the land referred to as the subject site in this evidence. Accordingly, there is no longer any proposed Lot 1 in the current application context.
12. The site sits between the more open Geraldine Downs environment to the west and south, and the established residential edge of Geraldine to the east and north.
13. From a design perspective, the most important physical driver was the landform. The site is not a flat greenfield block. The topography includes two main rolling ridges, a central gully running roughly east-west that contains an ephemeral waterway, and smaller drainage features and low-lying areas in the northern and southern parts of the site.
14. Those physical characteristics informed a design approach that sought to respond to the site rather than apply a standard layout pattern to it. In particular, the natural drainage corridor, the position of the existing dwelling and access, the available road connections, and the relationship to adjoining residential properties all shaped how the subdivision could sensibly be arranged.

EVOLUTION OF THE DESIGN

15. The design now before the hearing is the product of several iterations. We picked up the project from initial design work previously completed by Milward Findlay Lobb, whose earlier concept had already identified the broad subdivision structure and key constraints of the site. Our subsequent work built on that foundation.
16. The earlier MFL concept explored a broadly similar internal road loop connecting Gresham Street and Huffey Street. As the design progressed through further consideration of the site topography and characteristics, engineering assessment, and Council feedback, a number of specific changes were made. Those included: formalising the stormwater management areas via a Local Purpose Reserve (for the pond) and the central gully corridor protected by an easement in gross in favour of Council; adjusting road geometry, carriageway width, and staging sequencing to reflect

the site gradient and infrastructure requirements; refining building platform locations in response to landform; and incorporating the right-of-way and servicing arrangement needed to serve Lots 2, 3 and 4 given their relationship to the internal road.

17. The current staged subdivision layout, with its looped road, stormwater reserve, central gully easement arrangement, and staged delivery structure, reflects that design process.

RESPONSE TO SITE CONSTRAINTS AND OPPORTUNITIES

18. In practical terms, the current layout responds to the site in several ways.
19. The central gully and drainage corridor is used as a structuring element of the layout rather than an obstacle to be engineered away. It is recognised through stormwater reserve and easement arrangements, which preserve the natural low point as part of the overall stormwater management response and incorporate it into the subdivision structure.
20. The road layout takes advantage of the site's ability to link between Gresham Street and Huffey Street, providing a connected internal network that supports staging and a more legible subdivision structure.
21. We have sought, as far as practicable, to limit and rationalise earthworks by generally following the ground contours while still providing suitable vehicle access, infrastructure corridors, and workable lot layouts. Building platforms are generally positioned with road frontage access in mind, which reduces the length of access and service connections and minimises unnecessary land disturbance, while still considering solar gain for future housing.
22. Where possible, residential lots have been arranged on both sides of the proposed road, contributing to a more balanced subdivision pattern and avoiding an unnecessarily one-sided roading corridor.
23. The layout reflects the practical need to balance access, lot usability, infrastructure corridors, and stormwater management. The scheme has been shaped to work with those constraints in a practical and workable way.
24. The staging reflects a logical progression from the lower southern and eastern components in Stage 1 to the upper and central parts of the site in Stage 2, reflecting topography and infrastructure sequencing.

STORMWATER, EARTHWORKS AND PRACTICAL DESIGN RESPONSE

25. Without stepping into the detailed engineering evidence, I note that stormwater and landform were central to the way the subdivision was arranged. The lot pattern, road alignment, and reserve structure have been developed alongside the stormwater and earthworks response so that the proposal functions as an integrated subdivision rather than a plan divorced from the site's physical realities.

26. The detailed three-waters and earthworks evidence is addressed by the engineering witness.

CONNECTIVITY, ACCESS AND NEIGHBOURHOOD STRUCTURE

27. The layout reflects a deliberate consideration of connectivity and access with links to both Gresham Street and Huffey Street. In my view, that approach has been developed with the Plan's connectivity and access design objectives in mind and avoids the subdivision turning inward on itself.

DISTRICT PLAN DESIGN THEMES

28. Without straying into planning opinion, I consider the current scheme reflects a number of practical subdivision design considerations – in particular those relating to responding positively to the site's physical characteristics, providing connected access, and integrating natural features into the layout.
29. My point is not that the proposal complies with all operative or proposed plan rules – I do not assert that. Rather, it is that the current layout is the result of an iterative design process that sought to respond to the site's physical attributes and to the practical design considerations that the Plan's subdivision provisions contemplate.

CONCLUSION

30. In summary, the subdivision layout at 44 Gresham Street has evolved in a deliberate and site-responsive way. The scheme has developed from its earlier form into the current staged subdivision layout, with its looped road, stormwater reserve, central gully easement arrangement, and staged delivery structure, in a way that responds to the site's topography rather than working against it.
31. In my opinion, the current arrangement represents a practical and coherent response to the site's physical attributes/landform, drainage, access and infrastructure considerations.

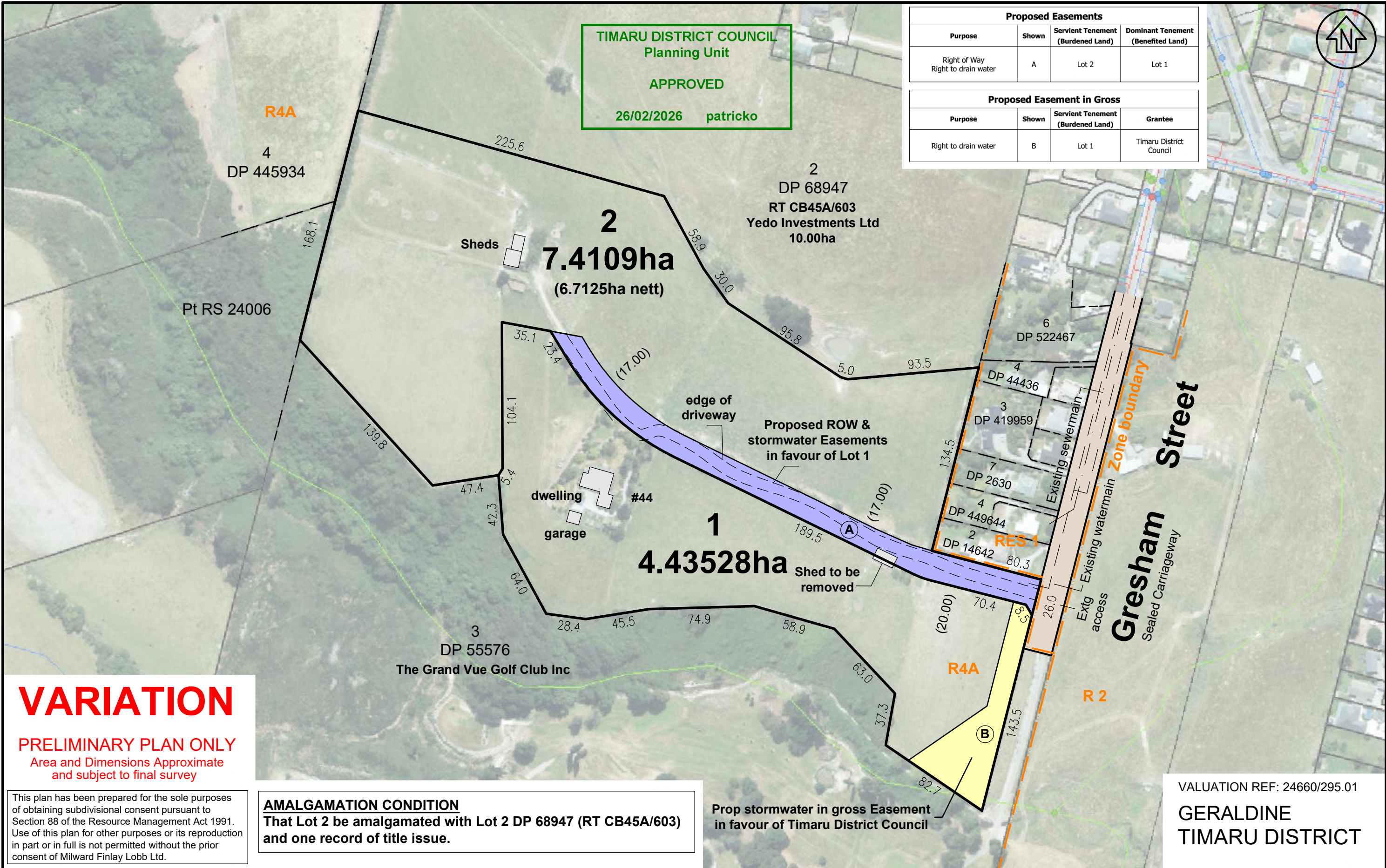
APPENDIX A

Underlying Subdivision RC 101.2022.71.2 – Approved Scheme Plan

TIMARU DISTRICT COUNCIL
Planning Unit
APPROVED
26/02/2026 patricko

Proposed Easements			
Purpose	Shown	Servient Tenement (Burdened Land)	Dominant Tenement (Benefited Land)
Right of Way Right to drain water	A	Lot 2	Lot 1

Proposed Easement in Gross			
Purpose	Shown	Servient Tenement (Burdened Land)	Grantee
Right to drain water	B	Lot 1	Timaru District Council



VARIATION

PRELIMINARY PLAN ONLY
 Area and Dimensions Approximate
 and subject to final survey

This plan has been prepared for the sole purposes of obtaining subdivisional consent pursuant to Section 88 of the Resource Management Act 1991. Use of this plan for other purposes or its reproduction in part or in full is not permitted without the prior consent of Milward Finlay Lobb Ltd.

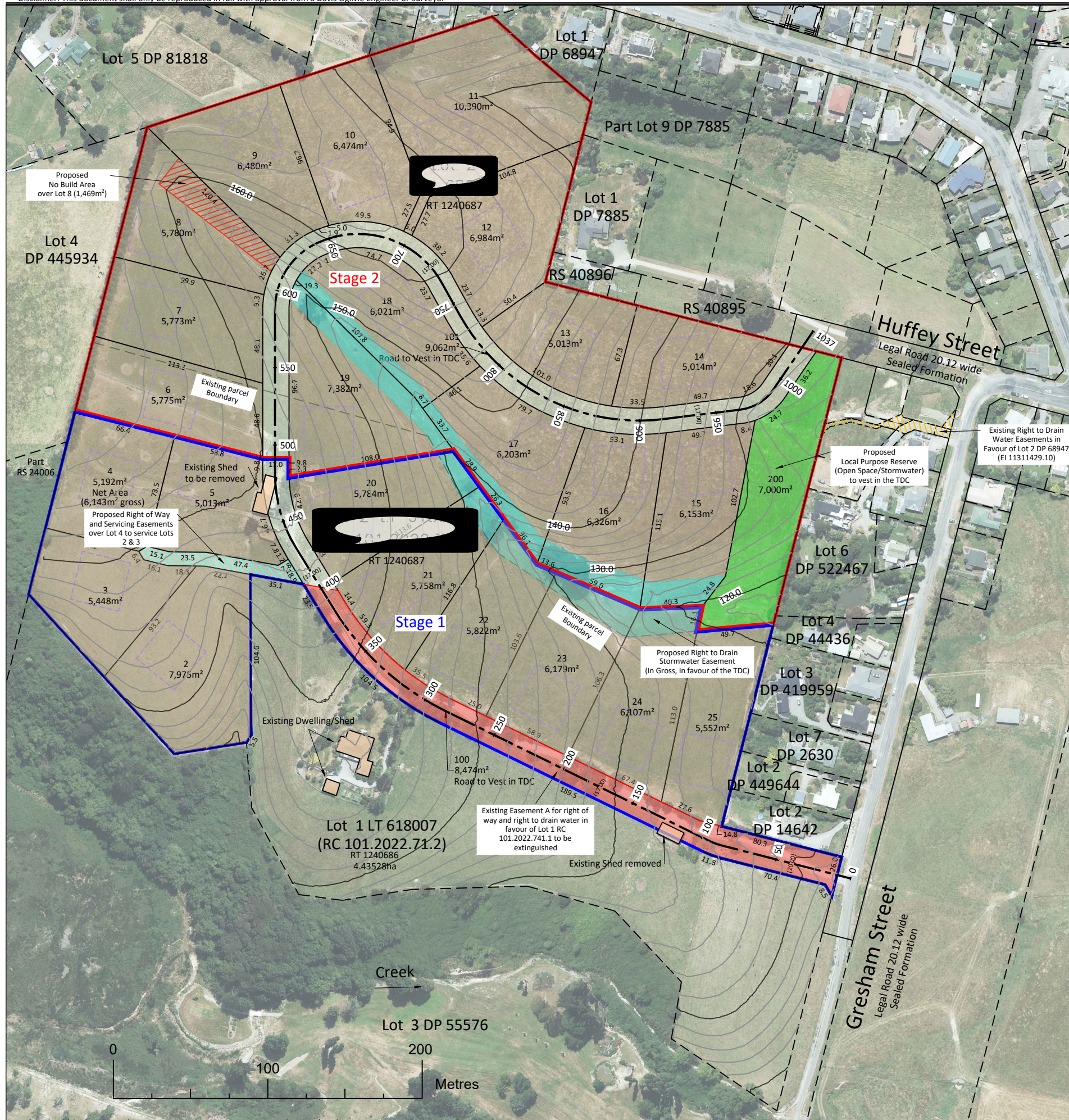
AMALGAMATION CONDITION
That Lot 2 be amalgamated with Lot 2 DP 68947 (RT CB45A/603) and one record of title issue.

Prop stormwater in gross Easement in favour of Timaru District Council

VALUATION REF: 24660/295.01

GERALDINE
TIMARU DISTRICT

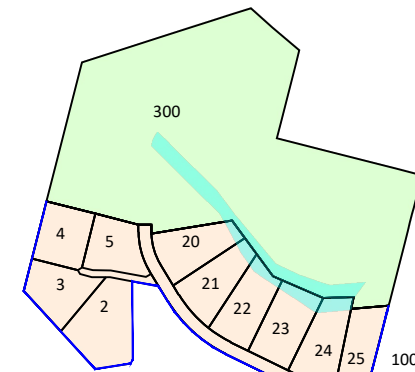
SCALE : 1 : 2,500 @ A3		Date : March 2022		Resource Consent Application Proposed Subdivision of Lot 3 DP 68947			6 The Terrace, Timaru 7910 PO BOX 434, Timaru 7940 P 03 684 7688 E admin@mflnz.co.nz www.mflnz.co.nz	Client/Job No. 295561/04 Sheet 1 of 1
Applicant: Yedo Investments Ltd		Surveyed ASR						
c/- Damon Odey		Drawn VCJ						
Parr & Co, P O Box 157		Variation 16.12.2025,						
TIMARU 7940		19.01.2026						



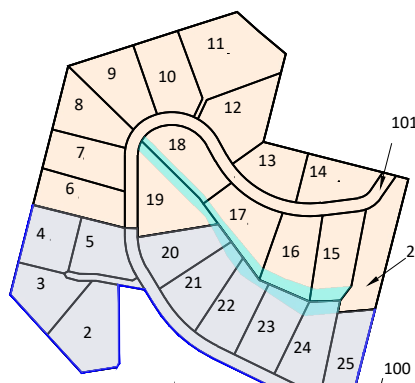
Staging Diagram Key

- Current Stage Lots
- Previous Stage Lots
- Balance Lot
- Stormwater Easement (in Gross)

Stage 1
 - Lots 2 - 5, 20 - 25 & Lot 100
 - Balance Lot 300 (105,831m²)



Stage 2
 - Lots 6 - 19, Lot 101, & Lot 200



Issue	Date	Reason	Approved
A	06/25	FOR DISCUSSION	GPM
B	07/25	FOR CONSENT	GPM
C	09/25	FOR CONSENT	GPM
D	11/25	RFI RESPONSE	GPM
G	03/26	FOR CONSENT	GPM

Notes:

Owners: Yedo Investments Limited

Address: 44 Gresham Street, Geraldine
 Appellation(s): Lot 2 DP 68947 & Lot 2 LT 618007 (RC 101.2022.71.2)
 RT Reference(s): 1240687 (upon deposit of LT 618007)
 Total Area: 17.4103 ha

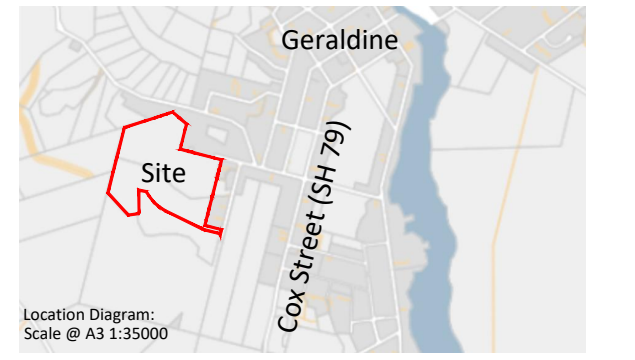
Applicant: Yedo Investments Limited

- All dimensions in metres unless shown otherwise;
- This plan is in terms of NZGD2000 Timaru Circuit & New Zealand Vertical Datum 2016;
- Existing boundaries adopted from LINZ online database;
- Aerial Photography: Sourced from LINZ Database under Creative Commons Attribution 4.0 International;
- Contours sourced from Milward Finlay Lobb Topographic Survey (2022)
- Major contours shown at 10m intervals;
- Minor contours shown at 2m intervals;
- For location of proposed and existing services refer to engineering plans
- This plan has been prepared for the sole purpose of obtaining subdivision consent pursuant to Section 88 of the Resource Management Act 1991;
- Use of this plan for other purposes or its reproduction in part or full is not permitted without the prior consent of Davis Ogilvie (Aoraki) Ltd;
- A full assessment of easements will be undertaken prior to final survey and subsequent to proposed servicing and engineering requirements being confirmed;
- All dimensions and areas are subject to final legal survey;
- This plan is to be read in conjunction with the draft title plan for LT 618007

- Key:**
- Proposed Residential Allotment
 - Proposed Balance Allotment
 - Proposed Local Purpose Reserve (to vest in the TDC)
 - Proposed Legal Road
 - Proposed Right of Way and Servicing Easement
 - Proposed Easement (Right to Drain Stormwater)
 - Existing Appurtenant Easement (Right to Drain Water)
 - Proposed No Build Area
 - Indicative Building Platform (32m x 32m)
 - Existing Easement to be Extinguished

The site is subject to a number of Operative and Proposed Timaru District Plan Overlays (either fully contained or in part). Refer to Timaru District Council website and GIS maps for full details and location of overlays:

- Operative Plan:**
- Rural 4A Zone
 - Rural Lifestyle Sub Zone
- Proposed Plan:**
- Rural Lifestyle Zone
 - Flood Assessment Area
 - Light Sensitive Area
 - Visual Amenity Landscape
 - Esplanade Provision / Public Access Provision
 - Specific Control Areas (10Ha Lot Size, Geraldine Downs Walking & Cycle Tracks)



FOR CONSENT