



Timaru District Council
2 King George Place
Timaru 7910
Phone: 03 687 7200

Further submission in support of, or in opposition to, submission on the Proposed Timaru District Plan

Clause 8 of Schedule 1, Resource Management Act 1991

Further submissions close on Friday 4 August 2023 at 5pm

To: Timaru District Council

This is a further submission in support of, or in opposition to, a submission on the **Proposed Timaru District Plan**.

Full name of person making further submission:

Yanna Houwaard + Stephen John Sullivan

Organisation name and contact (if representing a group or organisation):

Click to enter text.

Only certain persons can make a further submission. Please select the option that applies.

I am:

- a person representing a relevant aspect of the public interest;
- a person who has an interest in the proposal that is greater than the interest the general public has;
- the local authority for the relevant area.

Please explain why you come within the category selected above:

We believe that the lack of land available for housing development is negatively impacting on the growth and future prosperity of the Geraldine community.

Hearing options

I wish to be heard in support of my further submission? Yes No

If others make a similar further submission, I will consider presenting a joint case with them at a hearing.

Yes No

Signature: Click to enter text.

Date: 4 August 2023

(of person making submission or person authorised to make decision on behalf)

PLEASE NOTE - A signature is not required if you submit this form electronically. By entering your name in the box above you are giving your authority for this application to proceed.

Electronic address for service of person making further submission: stevesullivanltd@gmail.com

Telephone: [0274355522](tel:0274355522)

Postal address (or alternative method of service under section 352 of the Act): [32A Waihi Terrace Geraldine](#)

Contact person: *[name and designation, if applicable]*: [Steve Sullivan](#)

You have served a copy of the further submission on the original submitter (this is required under the Resource Management Act 1991 Schedule 1, s8A(2) to be completed within 5 working days after it is served on the Timaru District Council)

Yes No

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Additional template for multiple further submission points

Name of person making further submission: Yanna Houwaard and Steve Sullivan (Original Submission No. 138)						
This further submission is in relation to the original submission of: Yanna Houwaard + Steve Sullivan	This further submission is in relation to the original submission Number: 138	The particular parts of the original submission I/we support /oppose are:	My/our position on the original submission is: Support or oppose	The reasons for my/our support/ opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details (which can include tracked changes) of the decision you want the Council to make in relation to the original submission point
Oliver Amies	22.2	SUB - Subdivision - Standards - SUB/S1 Allotment Sizes and Dimensions	Support	We agree with Mr Amies' submission for smaller allotment sizes in RLZ to enable more cost effective development and sustainable use more limited RLZ land resource. Council should apply a site specific approach to lot size to promote innovative and appropriate 'best practice' solutions.	Allow submission in full	Amend SUB-S1.4 to allow for 2000 sqm in the FDA10 Overlay for RLZ and apply this logic to other RLZ areas to fulfil demand for desirable larger size sections across the District. Promote Policies, Objectives and Rules that make available and enable sustainable use of limited RLZ land resources across the district. Remove FDA 11 overlay and rezone the relevant area as RLZ to reflect its current use (as per our submission).
R & G Kellahan	26.1	Planning Maps - Rezone	Support	We support this submission in full. It does not make sense to maintain the GRUZ across the precinct to the north of Geraldine (encompassed by Main North Road, Bennett Road and Templer Street). Doing so is at odds with Section 2 of the RMA and various other strategic planning objectives and the site area is in perfect proximity to Geraldine and is already well serviced. Its existing use is already predominantly RLZ.	Allow submission in full.	Apply the relief sought in original submission. Zone the land bounded by Templer Street, Main North Road and Bennett Road (proposed FDA 11) as RLZ. Immediate rezoning as RLZ would best reflect the current level of development and activities of the area.
Bruce Selbie	32.1	Planning Maps - Rezone	Support	We support the submission based on the matters outlined in the summary, particularly that the PDP does not provide enough residential and RLZ land to support Geraldine's current and future needs.	Allow submission in full.	We support rezoning 77 Main North Road as RLZ, but consider that the entire area encompassing Main North Road, Bennett Road and Templer Street should all be rezoned as RLZ, to reflect the current level of subdivision and the existing characteristics and activities of the area (as per submission 26 (Kellahan); 85 (Badcock); 88 (Morten); 108 (Joint Submission); 109 (Harper); 160 (Payne)). This area provides a defensible boundary between Geraldine township and general rural uses, and it is illogical to maintain this precinct as GRUZ zoning. As per Submission 26: "Zoning this area as GRUZ does not give effect to multiple over-riding directives including but not limited to the NPS on Urban Development Capacity 2016, Objectives OA1-3, Timaru Growth Management Strategy, Strategic Directions 1, 3, 7 and 8, and Part 2 of the RMA, Section 7(b) and (ba). Applying FDA 11 is also illogical, when the current use of the precinct is primarily RLZ."
Milward Finlay Lobb	60	Subdivision - SUB S1	Support	The 2 ha RLZ minimum allotment size where there is no sewer connection is overly restrictive and is not inline with other Council precincts (i.e. no minimum allotment size for Settlement Zones, Paereora and Woodbury, where there is no sewer access). The prescriptive minimum allotment size undermines Council's discretion, will likely lead to perverse outcomes and prevent innovative development solutions.	Allow submission in full	Amend 4.4. to: in any other areas, 5000m2 to provide flexibility and Council discretion for providing the best development solutions for specific sites. This will avoid wasteful use of limited RLZ land and perverse outcomes with restrictive consenting rules. Council will always have the AEE mechanism to mitigate adverse effects as per the RMA. Furthermore, as per Submission 22 (Amies) this logic can be argued for 2000m2 lot sizes, because On-site Wastewater Management Systems (OWMS) can be designed effectively for this lot area depending of factors like, but not limited to, soil type and carrying capacity. This would further avoid wasteful use of RLZ resources.
	60	FDA - R7	Support	A non-complying activity status for more than one residential unit per site is far too restrictive and diminishes Council's discretion. This is very short sighted given that our district, and Aotearoa is currently confronting a housing crisis.	Allow submission in full.	Accept relief proposed in original submission, OR wording to similar effect.
John Leonard Shirtcliff and Rosemary Jean Shirtcliff	81.2, 81.3	SUB - Subdivision - Standards - SUB S1 - Allotment sizes and dimensions	Support	2ha minimum lot size is too large as a minimum size for RLZ, it will lead to wasting the RLZ resource and poor management outcomes. In a rural town like Geraldine there needs to be a happy medium achieved with providing land options that provide manageable lot size but provide more rural amenity than dense town subdivisions. Rural amenity and some space is what attracts people to live in towns like Geraldine, but 2ha requires a huge amount of work to maintain, while being too small to be self sustaining. The 2 ha RLZ minimum allotment size where there is no sewer connection is overly restrictive and is not inline with other Council rules. The prescriptive minimum allotment size limits Council's discretion and will likely lead to perverse outcomes and prevent innovative development solutions.	Allow submission in full.	Remove the 2ha minimum lot size. It is too large as a minimum size for RLZ and wasteful of the limited RLZ resource. Canterbury Regional Council (hereafter ECan) has clear policies, objectives and rules relating to OWMS, drinking water separation zones and allotment sizes where sewer connection is unavailable (see submissions 108 and 160). These rules should take precedence with District Council planning mechanisms being in alignment to avoid overreach. The addition of further and contradictory rules is unnecessary, causes confusion, delays and adds unnecessary cost.

John and Linda Badcock	85.1	Planning Maps - Rezone	Support	We support the submitter's view that more RLZ and Residential land for housing development is required to support / provide for Geraldine's growth and prosperity. The lack of suitable land currently available is currently holding back the community. Not enough land has been zoned for RLZ close to Geraldine township. The minimum allotment size of 2 ha for RLZ is too large for many people to manage. The area to the north of Geraldine is more appropriate for residential and rural lifestyle development.	Allow submission in full	Support relief sought in original submission, as follows: "Make more residential and rural lifestyle land available to provide for the current needs of Geraldine and future growth and prosperity. The area to the north of Geraldine along the east and the rest of Main North Road from Templer Street to Bennett Road and Woodbury Road should be rezoned an appropriate mix of residential and rural lifestyle with smaller, more manageable lots consented. This area should not be retained as GRUZ."
Anna Morten	88.1	Planning Maps - General	Support	Not enough land has been zoned for RLZ close to Geraldine township which has detrimental effects on the prosperity of the town.	Allow submission in full.	Support relief sought in original submission. Rezone the area to the north of Geraldine, along the Main North Road to Woodbury Road and east of Main North Road between Templer Street and Bennett Road to RLZ to reflect the existing land use of the area and provide additional housing opportunities for our community.
G & R Harper, R & G Kellahan, B & S Robertson, D & S Payne	108.1	Planning Maps - Rezone	Support	It is not appropriate to zone the relevant area as GRUZ. The existing land use activities are not consistent with the Timaru District Council's Proposed GRUZ Objectives, Policies and Rules. The proposed zoning does not meet Part 2 of the RMA. If the land is rezoned RLZ now, Templer Street and Bennett Road become a clear delineated defensible edge of the GRUZ and this more appropriately reflects the existing use of the area on the peri-urban zone, while enabling council to provide for current and future land demand in Geraldine. Submission 26 (R & G Kellahan) and submission 160 (D & S Payne) specifically address the inappropriateness of current and proposed zoning.	Allow submission in full.	Accept relief sought in original joint party submission: The relevant area of land should be rezoned from GRUZ to RLZ to reflect the existing land use of the area and provide scope and flexibility for the future. The area has NOT aligned with the proposed GRUZ Policies, Objectives and Rules for many years. The area is also located in perfect proximity to Geraldine township, on flat gradient flood safe land, with easy walking/biking access to the urban centre without needing to use a car, which is increasingly important to people and a focus of 'active and accessible urbanism'.
	108.2	Planning Maps - Future Development Area Overlay - FDA11 - Templer Street Future Development Area	Support	We support removing FDA11 from the Future Development Area Overlay. Given the length of time for Council processes and plan review, the 10+ year timeframe creates significant uncertainty for those living in the relevant area and has no benefit given the realities of its current use. Council has to accept that the relevant area is no longer GRUZ and immediately zone the entire area RLZ recognising the form and function of the predominant land use it currently has and its immediate proximity to Geraldine's urban area.	Allow submission in full.	Delete FDA11 from the Future development Area overlay. Rezone relevant area to RLZ to recognise its current use and immediate proximity to Geraldine's urban area.
	108.3	SUB - Subdivision - General	Support	We support the original submission content. 2ha minimum lot size is too large as a minimum size for RLZ, it will lead to wasting the RLZ resource and poor management outcomes. In a rural town like Geraldine there needs to be a happy medium achieved with providing land options that provide manageable lot size but provide more rural amenity than dense town subdivisions. Rural amenity and some space is what attracts people to live in towns like Geraldine, but 2ha requires a huge amount of work to maintain, while being too small to be self sustaining. The 2 ha RLZ minimum allotment size where there is no sewer connection is overly restrictive and is not inline with other Council rules. The prescriptive minimum allotment size limits Council's discretion and will likely lead to perverse outcomes and prevent innovative development solutions. We emphasise that ECan is the consenting authority for OWMS. We note that "for areas larger than 4ha On-site Wastewater Disposal is a Permitted Activity . All applications are assessed on a case-by-case basis, but, in general detailed information and proof of plans for highly-effective systems will be required for: sites smaller than 4 ha: ... ".	Allow submission in full.	Remove the 2ha minimum lot size. It is too large as a minimum size for RLZ and wasteful of the limited RLZ resource. Accept relief in original submission. Amend the SUB-Subdivision chapter to: 1. Remove the 2ha minimum lot size for OWMS within the RLZ. 2. Create rules to align with SUB-P15, and ensure consistency with Environment Canterbury's activity rules related to OWMS. SUB-P15 may need to be aligned to reflect Mr Amies submission (no. 26), bearing in mind that OWMS can be designed to be effective at 2000m2 in particular situations.
George and Rachel Harper	109.1	Planning Maps - Rezone	Support	We support this submission in full. We agree that the TDC's current approach to land availability in Geraldine is far too conservative. Not enough land has been zoned for housing close to Geraldine, which is impacting on the community's current social and economic prosperity and ability to retain talent, which will intensify going forward. Continuing to zone the area as Rural (GRUZ) does not meet the purpose and principles of Part 2 of the RMA nor TDC's own Objectives, Policies and Rules that are in the documentation for the Proposed (Notified) District Plan including The Growth Management Plan (2016) and the s. 32 Subdivision report.	Allow submission in full.	Council needs to take a strategic view of the area north of Geraldine and zone it appropriately (RLZ) to reflect its current use and characteristics. The area has NOT aligned with the proposed GRUZ Policies, Objectives and Rules for many years. The area is also located in perfect proximity to Geraldine township, on flat gradient flood safe land, with easy walking/biking access to the urban centre without needing to use a car, which is increasingly important to people and a focus of 'active and accessible urbanism'.

