

## MEMORANDUM: PTDP – Hearing G – Response to RFI

**To:** Timaru District Council  
**Submitter:** Aitken/ RSM Trust Submission **237.2**  
**From:** Davis Ogilvie (Aoraki)  
**Date:** 20 February 2025  
**Subject:** Response to preliminary s42A report for Hearing G - Growth

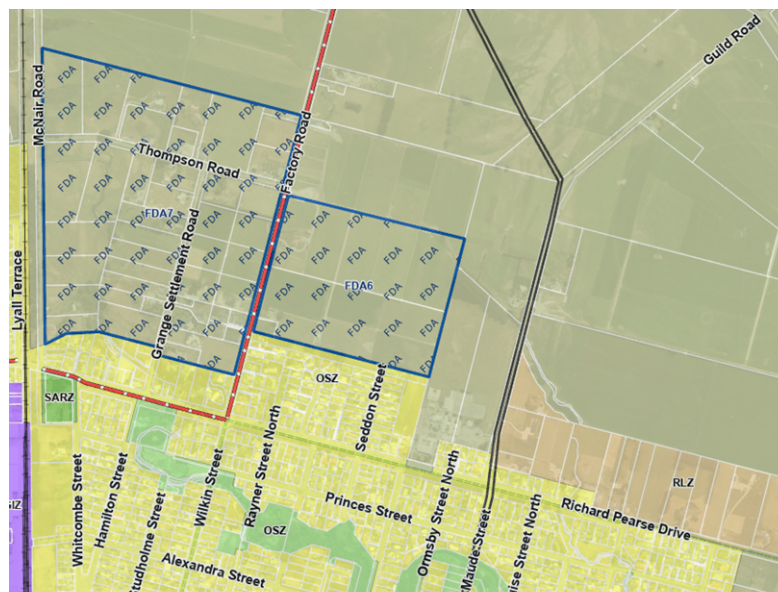
### 1 INTRODUCTION

The purpose of this memorandum is to reply to Council's preliminary s.42A report in relation to Hearing G - Growth. The short s.42a report requested further information be supplied to Council to address the planning framework, servicing considerations, environmental values and site-specific matters.

### 2 BACKGROUND

#### 2.1 Submission

Our client's submission requests that FDA6 (Temuka) be either rezoned now to General Residential Zone (GRZ) or that the schedule be amended from a "beyond 10 year" timeframe to a "5 year" timeframe. The location of FDA6 is shown below in **Figure 1**.



**Figure 1:** Location of FDA6

### 3 PLANNING FRAMEWORK

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#### 3.1 National Policy Statement: Urban Development

Timaru District Council, as a Tier 3 Council, must still plan for urban growth in a way that avoids unnecessary barriers to development under the requirements of the NPS-UD.

Upon development, the greenfield FDA6 site could yield somewhere between 140 - 240 lots/household units. This potential yield is based on the following assumptions:

- The FDA6 site area is 17.93 ha
- Less 40% reduction in developable area to accommodate roading, reserves, stormwater management and unmapped constraints (17.93 ha - 7.17 ha = 10.75 ha)
- Then a sensitivity assessment based on a section size range of 0.0450ha to 0.0800ha (450m<sup>2</sup> being the minimum lot size under the PDP and 800m<sup>2</sup> being more realistic for Temuka while still meeting 12 HH/ha), thus resulting in a potential yield range of approximately 140 – 240 residential sections. We would note that for any infrastructure planning purposes one should use the higher potential yield/minimum lot size (i.e. 240 sections), however for potential capacity and market uptake/demand we would suggest that the more realistic/lower density of say 140 sections be considered so as to not overstate potential supply thus ensuring 'at least' supply over the life of the plan is achieved.

The subject site is in close proximity to Fonterra's Clandeboye factory and the Temuka township. This is a significant development which will help meet demand of new and affordable housing in this district. The Property Economic analysis shows that Temuka is heavily relying on infill development to meet expected demand, under both medium and a high growth projection. History shows infill demand is subject to several constraints, one of which is land owner's willingness to develop which is outside of Council's control. Furthermore, the Growth Management Strategy 2022 recommends this site *"as a potential growth area and zoned FUZ. This land is well located to amenities, infills the area between the Rural Lifestyle zones, is already partly occupied by the high school and is still relatively unfragmented."*

The GMS 2022 also considered that in comparison the RLZ areas are somewhat fragmented and therefore the preference is to rezone additional greenfield land in Temuka identifying the subject site as being suitable for this purpose.

These matters among others should be considered in the context of the NPS-UD which at a high level are mentioned within the brief planning advice memo prepared by Novo Group, attached as **Appendix 2**. Particularly in regards to capacity, we consider Council should be certain on the assumptions that the PE modelling has used. While not entirely clear, the PE analysis seemingly

bases the capacity/supply assessment on a 450m<sup>2</sup> lot size within the general residential zone, when in reality for our district the average residential typology size is much larger. This is supported by the market evidence within the Colliers, 2022 Timaru Residential Property Market Study commissioned by Council, which notes on page 13: *“Of note the average land area of a vacant section is 1,033sqm compared to 784sqm for the average house”*, both being well above the 450m<sup>2</sup> that seems has been used. Even using an average of 12 HH/ha (833m<sup>2</sup>) compared to 450m<sup>2</sup> represents that forecast capacity modelling could fall short by some 46% of projections if on average 450m<sup>2</sup> has been used across the district – putting into question whether ‘at least’ sufficient supply is being allowed for.

### 3.2 National Policy Statement: Highly Productive Land

As the subject site has a proposed rural zoning and includes areas of LUC 2 classified soils, regard must be had towards the NPS-HPL only if the site is to be rezoned through the District plan review.

NPS-HPL allows for exemptions, one being when land is identified for future urban development in a strategic planning document such as the GMS Review 2022. Despite FDA6 being suitably identified and defined within this document, the GMS Review 2022 notes the site should be considered as a “FUZ” or future urban zone. As no timeframe was proposed for the proposed zoning within the GMS Review 2022, the site is still subject to assessment against the NPS-HPL if Council was to consider rezoning to General Residential zone.

The secondary relief sought is to retain the FDA, but amend the timeframe from “beyond 10 years” to “5 years”. As the retention of the FDA, or change in timeframe, does not rezone the underlying land, limited consideration towards NPS-HPL shall be had, as the land within FDA6 is still subject to a private plan change process to amend the underlying zoning from General Rural Zone to General Residential zone.

This assessment has been confirmed by Matt Bonis, being the author of the *“Without prejudice – Applicability of NPS-HPL to proposed re-zonings – Growth Topic”* Memorandum, dated 21 January 2025.

We note there is a section of FDA6 not subject to NPS-HPL, as shown on the **Figure 2** below:



**Figure 2:** FDA area outside of NPS-HPL

The client requests this section of land is immediately zoned General Residential as part of the District Plan Review in the absence of consensus regarding FDA6 and NPS-HPL.

Additionally, our client wishes to retain the right to respond to NPS-HPL considerations until review of the full s42A Report, to better understand Council's appetite to rezone the subject land under the District Plan review process.

### 3.3 Canterbury Regional Policy Statement

**Growth Rezonings/Amendments to SCHED-15:** FDA6 is located over three Records of Title, all of which are owned by the submitter. The subject site is therefore unfragmented which allows for a coordinated, efficient pattern of development.

**Energy Efficiency:** FDA6 has road frontage onto both Factory Road and Seddon Street. The development of FDA6 will therefore provide efficient roading links to existing roads. Factory Road is designated as a collector road within the District Plan. The Temuka High School is located to the south-east of FDA6 and any residential development which allows for children to walk to school will also have positive health, environmental and social benefits. As touched on earlier, FDA6 is in close proximity (<10km by road) to Fonterra, one of the Districts largest employers, so provides an option for more efficient commuting for employees.

**Natural Hazards:** The subject site is within a Flood Assessment Area under the Proposed Timaru District Plan, as is all of the Temuka township and surrounding land. A **flood hazard assessment** (FHA) has been provided which summarises the site is suitable for residential development. The FHA attached as **Attachment 1**.

**Yield:** The proposed development will be in accordance with the Regional Council's submission, which seeks 12 hu per ha. As noted above in section 3.1, the number of sections/lots the site could yield could vary between 140-240 lots with many local factors that may influence this. However given the existing pattern of development south of the site (i.e. Around Harris Place), along with

the flat nature of the site and potential desire to supply affordable housing, it would be reasonable to anticipate a yield around 180 lots could be expected (i.e. at approx. avg. size 600m<sup>2</sup>).

### 3.4 Proposed Timaru District Plan

**PDP:** FDA6 has road frontage onto both Factory Road and Seddon Street. The development of FDA6 will therefore provide connectivity and efficient roading links to existing roads. Factory Road is designated as a collector road within the District Plan.

**Amendments to SCHED-15:** The secondary relief seeks a change in timeframe for FDA6 to “5 years”. FDA7 is located immediately west of FDA6 with the development area being identified for rural lifestyle development – 2 years. FDA7 is subject to several constraints against growth, including LUC 2 soils and being heavily fragmented with a large number of land owners. Therefore it is anticipated a much greater density of sections will be realised from FDA6 than FDA7 which is considered a more efficient use of land and resources.

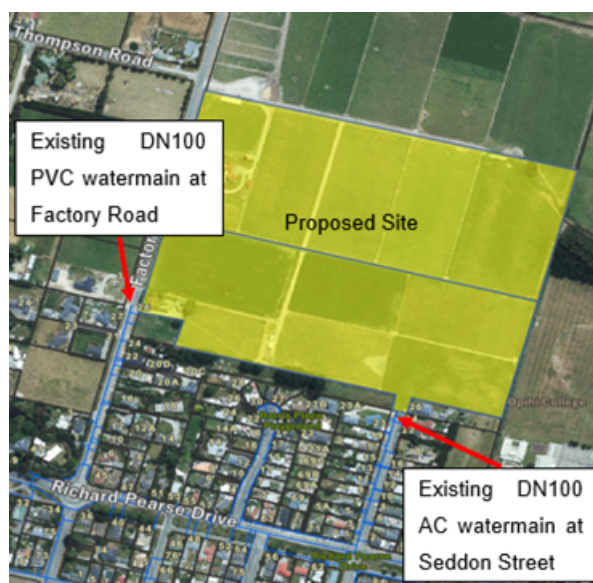
Furthermore, the development of FDA6 can be efficiently serviced due to the proximity of the three water networks, as well as Energy and Telecommunication services. See Section 4 below.

## 4 SERVICING CONSIDERATIONS: SELWYN CHANG, PRINCIPAL CIVIL ENGINEER

### 4.1 Service Provision

#### Portable Water Supply

There is nearby public water network close by to service the proposed site. There is an existing DN100 PVC watermain at Factory Road and DN100 AC watermain in Seddon Street respectively.





The extension of the network should have sufficient capacity to deliver the required urban level of service to the proposed development.

### **Wastewater**

There is nearby public wastewater network close by to service the proposed site. There is an existing DN150 CC-RF wastewatermain at Factory Road and Seddon Street.



The existing wastewater network pipe depth at the point of connection is considerable shallow and unlikely to be extended as fully gravity system due to insufficient pipe cover to meet Council standards and Building Code. Therefore, a low-pressure network system or a communal wastewater pump station can mitigate this issue.

### **Stormwater**

There is no public stormwater network in vicinity to the proposed site. It is anticipated the site will have its own stormwater management system that manage post-development stormwater runoff.

Subject to detailed assessment of the ground conditions, it is considered likely that the proposed site could be suitable to discharge stormwater to ground. A spring fed water course (ECan drain) also runs through the north east corner of the site, this provides another option for discharge of stormwater (i.e. discharge to surface water). Therefore, the proposed site will require discharge consents to be obtained from ECan.

## **Electricity**

Alpine Energy has confirmed the site is able to be serviced for power.

## **Telecommunication**

It is anticipated there is no issue to service the proposed site.

## **4.2 Hazards**

### **Liquefaction Assessment**

From TDC Infrastructure Design Standard; Part 4, the liquefaction potential in Timaru District identified the proposed site to be of very low potential liquefaction. This aligns with Canterbury Map liquefaction desktop assessment (MBIE Level A assessment) confirming liquefaction damage is unlikely.

### **Flood Hazard Assessment**

A FHA have been carried out by ECAN for 26 and 52 Factory Road, Temuka, see **Attachment 1: Flood Hazard Assessment**

The FHA described as low risk and therefore development should be permitted under the District Plan rules, provided that the flow of floodwaters through the area and flood depths are addressed.

Determining habitable floor heights, appropriate stormwater management system for the development, management of overland flowpath can contribute to mitigate the floodwater issues and not creating any adverse impact downstream.

## **5 ENVIRONMENTAL VALUES**

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### **5.1 Existing Environment and Characteristics**

The area contained within FDA6 has an area of approximately 17 ha and is held with an additional 10 ha to the north, contained within three records of title. The sites include residential dwellings, and farm sheds, with the balance being cultivated, grazed farmland.

The site is heavily overlooked by residential activity to the west and the south, and adjoins the Temuka High School to the east. Taumatakahu Stream traverses the north-east corner of FDA6.

The land to the north is owned by "Public Trustee" and appears to be incorporated as part of a farming operation to the north.

The site is unable to comply with the anticipated density standards under the Proposed District Plan.

## 5.2 Environmental Values

The site is identified as having “wāhi tupuna” values, as does the larger Temuka region. To provide context, wāhi tupuna is considered to mean:

*“Broader geographical areas/ cultural landscapes that hold significant value to Kāi Tahu due to the concentration of wāhi tapu or taoka values, or the importance of the area to cultural traditions, history or identity.”*

## 6 SPECIFIC MATTERS

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### 6.1 Further Comments:

The site has been suitably identified in a Strategic Planning Document (GMS Review 2022) and therefore meets this exemption under the NPS-HPL. However, as the GMS Review 2022 did not identify this as commencing over the next 10 years it has been excluded within this plan change process. We note the second FDA identified in Temuka (FDA7) is identified as “Rural Lifestyle”. Clause 3.7(1) states Council’s must **avoid** rezoning of highly productive land as rural lifestyle, except as provided in clause 3.10. We therefore consider FDA7 will face significant challenges such as the fragmentation of the land and proposed “rural lifestyle” zoning. FDA6 provides for a more efficient use of land and resources, and it is sited in closer proximity to Council infrastructure. The land is in single ownership and presents a better option for coordinated, affordable and consolidated development.

## 7 CONCLUSION

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The site is generally flat in nature and adjoins residential zoned land to the south. It is a large land holding, held in one ownership, which secures efficient development. FDA6 has the potential to yield up to approximately 240 household units (noting our comments within this memo on realistic yield considerations being much lower than this), which is sited in close proximity to the existing Temuka urban township, places of work and education facilities. The site is able to be serviced in an effective manner due to the greenfield nature of development and easy connection to the existing networks of roading and three waters services. The development will bring new development to Temuka which will bring new, affordable housing and support employment opportunities.

Council has already accepted the site is suitable for residential development under the Growth Management Strategy 2022. Furthermore, consideration must be given to the NPS-UD which allows for Council to identify “at least” sufficient capacity. Should rezoning not be feasible through the District Plan review, the submission seeks to retain FDA6 and adjust the timeframe to “5 year”.



*Disclaimer: The above is intended to provide the preliminary s.42A author with some further information in regards to the suitability of the site for residential development. The submitter retains their right to provide further information in response to the s42A report and is not bound by the information provided to date.*

## **8 ATTACHMENTS**

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- Appendix 1 – Flood Hazard Assessment
- Appendix 2 – Novo Group – Planning Advice on NPS-UD

## **APPENDIX 1**

### Flood Hazard Assessment

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14 February 2025

Lauren Roycroft  
Davis Ogilvie & Partners Ltd  
PO BOX 359  
Timaru 7910  
**New Zealand**

Dear Lauren

**Flood Hazard Assessment – Proposed Subdivision  
26 & 52 Factory Road, Temuka  
Lot 2 DP 377989, Lot 39 DP 6860, Lot 1 DP 377989, Valuation No: 24690-142-03**

This 27-ha property is located on the east side of Factory Road. Ground levels across the property are predominantly flat, though minor variations exist, and a swale passes through the northeastern corner of the property. The ground falls towards the east and the land along the eastern parts of the property are lower than the western parts.

**Historical Flooding and Modelling**

Records held by Environment Canterbury indicate low areas to the east of the property were affected by flooding in the 13 March 1986 flood event. A map showing the extent of this flooding is attached to this letter. That flood had a peak flow of 210 cumecs in the Waihi River and an Average Recurrence Interval (ARI) of around 50-years.

**Note:** Average Recurrence Interval (ARI) represents the average period between floods of a certain size.

Flood investigations carried out by Environment Canterbury in 2009 indicate the property is likely to be affected by flooding in the 100-year Annual Recurrence Interval (ARI) flood and greater. Initially flooding will be limited to historic flow paths and areas of low ground, but as flows increase, ground of more average height is likely to be affected. In the largest event modelled, the 500 ARI flood, the entirety of the property is expected to be flooded, with depths exceeding 500 mm across most of the property.

To provide perspective, the 100 ARI flood and greater are extreme flood events and will involve several river and stream breakouts and widespread flooding of Temuka township and the wider area. The last time this part of Temuka saw significant flooding was during the 21 February 1945 flood when the Orari and Waihi Rivers flooded the town. It should be noted that at the time of the 1945 flood, Flood Protection Works were at a much lower standard than they are today. However, in an event of that size, similar patterns of flooding can be expected to occur. Attached to this letter are two photographs that were taken during this event and give an indication of flooding in the area. Unfortunately, these photographs were taken well after the flood peaked and most water had dispersed though it is clear water did flow through the Factory and Guild Road areas.

Another consideration is the influence of local runoff and stormwater flooding. Modelling undertaken by WSP Ltd on behalf of Timaru District Council indicates that the site can expect widespread runoff flooding of the property in a 200-year rainfall event. Water depths are expected to range from 100 to 400 mm in depth across most of the property. Deeper flooding

**Key Ref:** 25020

**Contact:** Oliver Hermans

will occur in other parts of the property, particularly the northeastern corner, with the deepest flooding concentrated around the swale discussed above. Alterations and earthworks associated with an extensive development such as what is proposed may alter the pattern of flows and could result in significant changes to the modelled flooding. I have attached several photographs taken in the Guild Road area following a storm event in 2000 that provide some context around what flooding in the area may look like. Also attached are photographs from the 1986 and 1945 floods.

### **Other Considerations**

The proposed development may affect the passage of floodwaters through this area during major flood events and the increase in hard surfacing and residential dwellings may create barriers to flow during events. Any infilling of existing swales or other low areas may have a diversionary effect on flooding.

It is critical that any development, especially on the scale of what is suggested, take the passage of floodwater through the site into account. I would recommend that considering the scale of the development that is being discussed, flood modelling is undertaken to demonstrate the impact of the proposal on both stormwater and large-scale river flooding events and the design is managed regarding these factors.

**As defined by the Timaru District Plan, the minimum floor height required for new dwellings by the Timaru District Council is at the expected 200-year ARI flood level. Based on the information available to Environment Canterbury, flooding of the property in an event of that size is likely to occur. In addition, development of the scale proposed may alter this risk.**

**Moderate elevation of the floor levels is likely to be required, though the degree of elevation at this stage is uncertain. Generally, I would consider higher elevations will be required in the eastern parts of the property. Environment Canterbury can assist with determining appropriate floor levels when a site plan is established.**

Overall, flooding at the property can be described as low risk. However, the proposal represents a significant alteration to both the use of the site and surrounding area. This in combination with the developments and changes occurring in neighbouring areas may alter the pattern and behaviour of flooding in the area. Any development or proposals for development that occur should take this into account and make them a key part of any design choices.

**When using the flood information provided in this letter it is important the following points are understood:**

- The information provided is the best information Environment Canterbury has at this time. The District Council or local residents may have further information about flooding at the property.
- Environment Canterbury's understanding of flooding at the property may change in the future as further investigations are carried out and new information becomes available.
- It is assumed that flood protection works will be maintained to at least their current standard in the future.
- Flooding can occur in smaller floods if stopbanks are breached at lower than design flows. A breach can occur through lateral or internal erosion of the stopbank. The location of a stopbank breach or overtopping may affect flood depths at the property.
- Flood flow paths and depths can be affected by changes on the floodplain such as:
  - Altering swales, roads or irrigation features
  - Property development including buildings, fencing and hedges
  - Blockages in culverts, drains and bridges

- Seasonal vegetation growth
- Antecedent soil moisture conditions

**The prediction of flood depths requires many assumptions and is not an exact science.**

I hope this information is of assistance. Please do not hesitate to contact me if you require any clarification.

Yours sincerely,



**Oliver Hermans**  
Scientist (Natural Hazards)

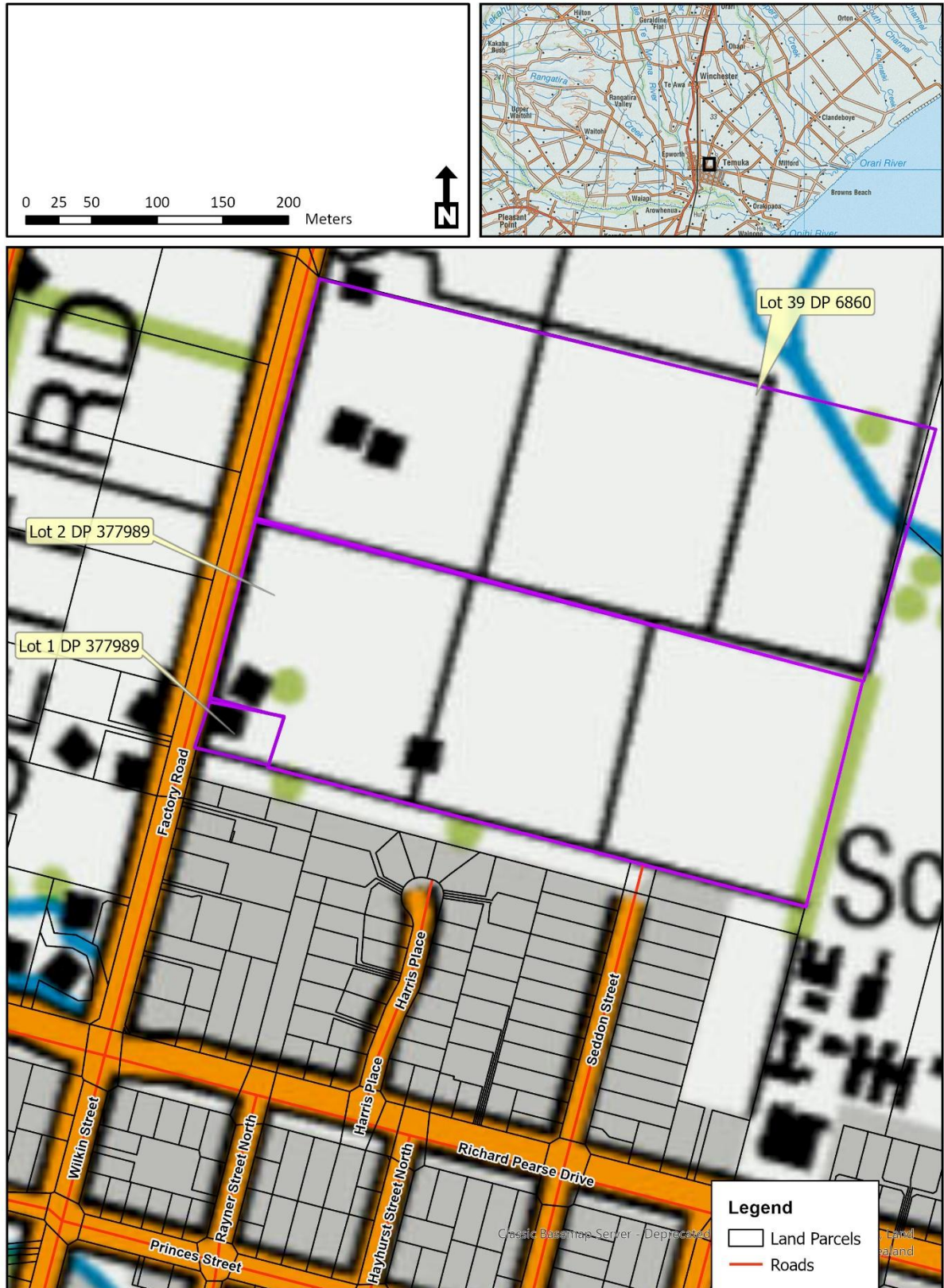
cc: William.Halkett@timdc.govt.nz  
Timaru District Council

**Attachments:**

- Topographic map showing location of property
- Aerial photograph of the property
- Site Plan (provided by applicant)
- Map of the extent 13 March 1986 Flood
- Photographs 10.69.19, 10.67.8, 10.66.9 – Temuka River – 19 August 2000
- Photographs 1.17.23, 1.17.24 – Temuka River – 13 March 1986
- Photographs 11450b, 11451 – Temuka River – 21 February 1945



# 26 & 52 Factory Road, Temuka - Topo





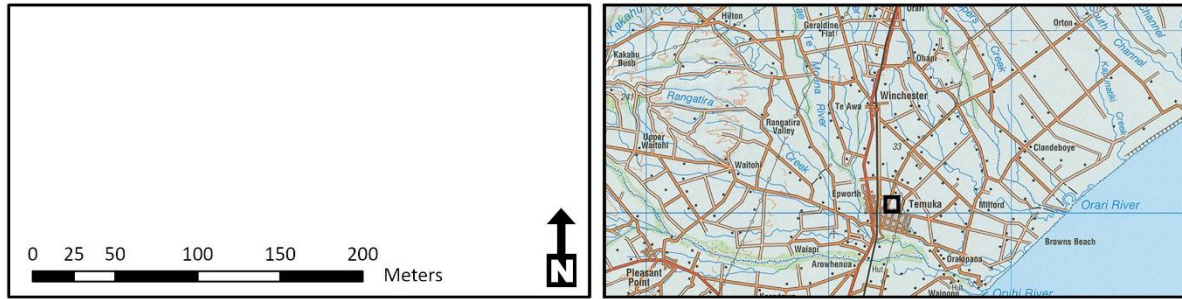


Future Development Area 6: Aitken Family Trust





# 26 & 52 Factory Road, Temuka - 1986 Extent







Temuka  
Local flooding.  
View N up Guild  
Road

19.8.2000 1700hrs  
K38 739 617

10.69.19

Temuka  
Local flooding. View  
NE from Guild Road  
(Pan View 10.67.6-9)

19.8.2000 1600hrs  
K38 739 617

10.67.8.



Guild Road

Join 10.67.9

Join 10.67.7

19 8 00



Naughtons Road

Kerrytown Road

Waitawa Creek  
View W up Naughtons  
Road from Kerrytown  
Road intersection

19.8.2000 1700hrs  
J38: 655 564

10.66.9.





Temuka River Trib.  
Taumatakahu Creek  
Nm Branch. View  
SE over Guild Road  
& Factory Road.

13.3.86 1300+hrs  
K38 734 629

1.17.23.



Temuka River  
View SE over  
Temuka High School  
Factory Road in  
foreground.

13.3.86 1300hrs+  
K38 738 618.

1.17.24.





Temuka River  
 Temuka township. View W Richard Pearce Drive towards Temuka & Opihi Rivers.  
 K38 7315 6175 22.2.45 11450b RNZAF



Temuka River  
 Temuka township. View W from above NE corner of township towards Temuka & Opihi Rivers.  
 Taumatakahu Stream middle of photo.  
 K38 733 613 22.2.45 11451 RNZAF

## **APPENDIX 2**

Novo Group – Planning Advice on NPS-UD

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19 February 2025

Davis Ogilvie (Aoraki) Ltd  
14 The Terrace  
Timaru 7910

**Novo Group Limited**  
Level 1, 279 Montreal Street  
PO Box 365, Christchurch 8140  
0 - 03 365 5570  
info@novogroup.co.nz

**Attention: Glen McLachlan**

**By email:** [glen@do.nz](mailto:glen@do.nz)

Dear Glen,

## **PLANNING ADVICE CONCERNING THE NPS-UD PROPOSED TIMARU DISTRICT PLAN**

1. This memo provides an overview of our interpretation of the National Policy Statement on Urban Development 2020 (NPS-UD) concerning the Timaru Proposed District Plan (PDP) in response to the preliminary s42A report prepared by Matt Bonis.
2. As summarised in the preliminary s42A report, the NPS-UD aims to ensure that sufficient land is available for housing and businesses. Growth is intended to be integrated with infrastructure planning and funding and occur in appropriate locations to support a well-functioning urban environment.
3. Under Policy 2, local authorities are required to provide for expected demand over the short (three years), medium (ten years), and long terms (30 years). While the policy sets a minimum threshold ("sufficient development capacity"), it does not preclude councils from enabling additional capacity where it contributes to a well-functioning urban environment and is integrated with infrastructure planning and funding. In fact, the words "at least" encourage councils to exceed mere sufficiency.
4. Beyond the question of capacity, Policy 1 mandates councils to assess rezoning requests in terms of their contribution to a well-functioning urban environment. A well-functioning urban environment is defined as one that enables a variety of homes that meet the needs of the community in terms of type, price and location among other factors (Policy 1(a)).
5. The economic assessment undertaken by Property Economics has identified a realisable capacity of almost 4,000 dwellings within the existing urban areas and approximately 3,500 dwellings within the Future Development Areas. However, it remains unclear whether these dwellings correspond to the community needs in terms of housing type, price and location.
6. For example, projections indicate an aging population. As a result, demand for smaller residential units and retirement villages rather than standalone homes is expected to increase for a growing segment of the community. At the same time, unlike in large urban centres such as Christchurch, there appears to be ongoing demand among families for properties with standalone houses that exceed the modelled 450m<sup>2</sup> allotment size.



7. Likewise, in terms of industrial land supply, Policy 1(b) mandates local authorities to provide sufficient land that meets the varying location and site size requirements of different business sectors.
8. In summary, local authorities must ensure at least sufficient capacity to meet demand across various housing types / land size, locations and price points. If evidence was obtained that demonstrates that the PDP does not adequately accommodate these evolving needs, the Council will need to consider alternative approaches to address the shortfall.

Yours sincerely,

**Novo Group Limited**

Mona Neumann

Planner

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