

MEMORANDUM REPORT: PTDP – Hearing G – Response to RFI

To: Timaru District Council

Applicant: Submitter 128 - Scott

From: Davis Ogilvie (Aoraki) Ltd

Date: 20 February 2025

Subject: Response to Hearing G Preliminary s42A report

1 INTRODUCTION

This memo has been prepared in response to the Preliminary s42A report prepared by Matt Bonis in October 2024, and subsequent clarification provided by Council and its representatives in the months since.

In his preliminary report, Mr Bonis identifies the purpose and scope of his report, and acknowledges the need described by Panel Minute 6, for more time for assessment and reporting than usual.

In his report, Mr Bonis identifies the information required and detailed this in a checklist for submitters (**Appendix 1**) to respond to. In addition to the general checklist, the following additional information is sought:

- a) The existing environment, including configuration and fragmentation of titles and geophysical boundaries that would delineate the requested zone boundaries.
- b) N/A
- c) N/A
- d) N/A
- e) Application of requirements in the NPS-UD especially in terms of development capacity beyond 'at least sufficient development capacity' for the purpose of Policy 2, and implications for integrated infrastructure and funding decisions (Objective 6).
- f) Consideration against the relevant statutory framework for achieving a consolidated pattern of development (as required by the CRPS and notified PDP) for all submissions listed, which includes the provision of a 'coordinated pattern of development' including implications for amending timeframes associated with SCHED-15
- g) Service provision as set out in Attachment B.

2 SITE CONTEXT

The subject site is located at 22 Templer Street, Geraldine, at the northeastern end of Geraldine (as shown in **Figure 1 – 3** below). The site directly to the west of the subject site has been subdivided for residential purposes, including the McKenzie Lifestyle Village. The subject site is intersected by a waterway (Raukapuka

Stream). The underlying zoning of the site is General Rural (GRUZ) under the Proposed Timaru District Plan, and the land is included within Future Development Area 3 (FDA3) as show in **Figures 1 – 3** below.

Overall, the submitter is supportive of the FDA over their site, however, the submitter seeks a reduction in the timeline for preparation of the Development Area Plan (DAP) and resulting plan change process. Given that the design of the proposed development of the site is well underway (**Figure 4**), the submitter seeks to reduce the 5 year timeframe for the preparation of a final DAP for the site.

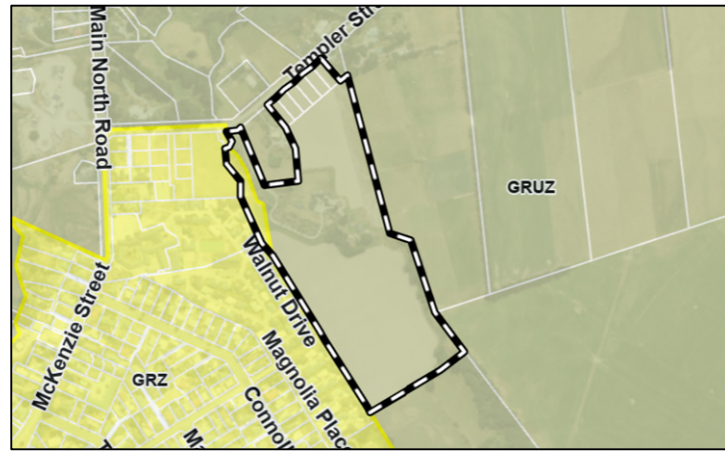


Figure 1: Proposed Timaru District Plan Planning Maps, showing relevant zoning.



Figure 2: Proposed Timaru District Plan Planning Maps showing Future Development Area for the site FDA3 (and its relation to FDA11).



Figure 3: Proposed Timaru District Plan Planning Maps, showing relevant overlays, including Drinking Water Protection Area, Esplanade Provision and Versatile Soils. The area of the site subject to versatile soils overlay is also classed LUC 2 land.

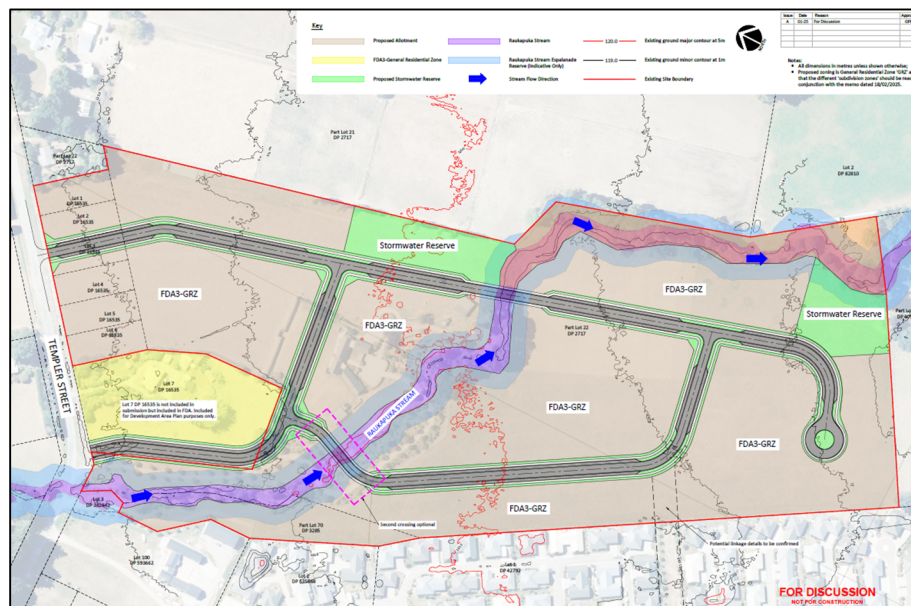


Figure 4: Indicative concept layout

3 ASSESSEMENT

NPS-UD

Question 1: What is the contribution of the rezoning (or amendment in timing associated with SCHED-15 (FDAs)) in terms of the provision (residential / rural lifestyle – yield, density; and business - area) in relation

to the Council's provision of 'at least' sufficient development capacity (**Policy 2**) given the Property Economics analysis (**Section 8**)?

The site was identified in the Planz Review of the Growth Management Strategy 2022 (GMS 2022) as suitable for future residential development. That report recommended that the site be zoned as General Residential under the Proposed District Plan (PDP). However, the site has remained rurally zoned within the PDP, with a Future Development Area (FDA) overlay applied to the land.

The 'Property Economics' (PE) Report examines development capacity of existing and identified land for future general residential development within the area. As such, the site has been deemed appropriate for future development – given its inclusion in the PDP as an FDA area. **Appendix 2** contains a concept development plan for the site and **Appendix 3** contains the Engineering Servicing Memorandum which assesses the site relative to the need for infrastructure to support development).

Of note, under the Proposed Timaru District Plan FDA5 and FDA11 (the only other FDA areas identified in Geraldine) both have Development Area Plan (DAP) requirements of 10 years. FDA3 is identified as a priority area (5 years). Given that a concept plan is well progressed and the submitter has been liaising with consultants to progress development of the site, the 5 year timeframe for preparing this DAP is now redundant. The submitter seeks that this timeframe is reduced in order to commence development of the site at an earlier date, to assist in reaching 'at least' sufficient development capacity, where the site has already been identified suitable for residential development. As identified throughout the plan review process, ensuring an adequate supply of land for housing is of key importance to all communities, with significant adverse implication for the community if supply is not sufficient.

These matters among others are mentioned within the brief planning advice memo prepared by Novo Group, attached as **Appendix 7**. We consider Council should be certain on the assumptions that the PE modelling has used. In particular seemingly basing the capacity/supply assessment on a 450m² 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 450m² that seems has been used. Even using an average of 12 HH/ha (833m²) compared to 450m² represents that forecast capacity modelling could fall short by some 46% of projections if on average 450m² has been used across the district – putting into question whether 'at least' sufficient supply is being allowed for.

Question 2: For residential and business rezonings how would the rezoning (or amendment in timing associated with SCHED-15 (FDAs)) contribute to 'well-functioning urban environments' (**Objective 1** and **Policy 1**) and align with responsibilities of the Timaru District Council to ensure decisions on urban development that affect urban environments are integrated with infrastructure planning and funding decisions (**Objective 6**)?

The FDA area is located directly adjacent to existing residential development, and the proposed concept design seeks to accommodate a similar form of development. As the site is located close to an existing local road, and a new subdivision is in development to the west of the site, connecting to existing infrastructure is considered feasible. Matters of infrastructure and servicing are discussed in more detail in **Appendix 3**.

Given the location of the site in relation to existing residential development, services, and wider infrastructure, early residential development of the site will enhance the prospect of developing a well-functioning urban environment.

NPS-HPL

Question 3: Urban Rezonings: *Demonstrate consideration and alignment with the requirements of the NPS-HPL Clause 3.6. for any submission for an urban rezoning (GRZ or GIZ) where the exemptions in 3.5(7)(b) are not applicable.*

The site was identified in the Planz Review of the Growth Management Strategy 2022 (GMS 2022) as suitable for future residential development.

As confirmed by correspondence between Mr Hakkaart (Timaru District Council) and Mr Bonis, the 'site is able to meet the exemption from the transitional definition of Highly Productive Land under Clause 3.5(7)(b)(i) and it is assumed that the National Policy Statement for Highly Productive Land (NPS-HPL) does not apply to the land' (Appendix 4).

Question 4: Rural Lifestyle Rezonings: *Demonstrate consideration and alignment with the requirements of the NPS-HPL Clauses 3.7 and 3.10 for any submission that requests a Rural Lifestyle rezoning (RLZ) where the exemptions in Clause 3.5(7)(b) are not applicable.*

Not applicable.

Canterbury Regional Policy Statement

Question 5: Growth Rezonings / Amendments to SCHED-15: *Does the proposal, either individually or in combination with those areas identified in the PDP concentrate and promote a coordinated pattern of development (referencing capacity provided in Section 8 of this report).*

As described in Question 2 above, the site has already been identified as suitable for development and is an acknowledged priority site for residential growth, hence its inclusion in the FDA overlay. The zoning is considered appropriate for the area given the proximity to established residential zoned areas, as well as FDA 11.

The submitters have already made significant progress in preparing a DAP and have included a concept development plan (**Appendix 2**) to show the anticipated development layout of the site.

The subject site is located within an area of Geraldine that is well serviced by roads and infrastructure, and has already experienced growth (the existing subdivision to the west of the site). The development of FDA3 is anticipated to include residential section size typology similar to that neighbouring the site to the west (i.e. 500-1000m²), aimed at achieving 12 HH/ha of nett.

Overall, it is considered that in allowing for earlier development than the 5 years proposed within the PDP, will assist in achieving a coordinated and connected pattern of development, as sought by the Council's 'Property Economics' report, among others.

Question 6: Energy efficiency: *Does the proposal assist in maintaining an urban form that shortens trip*

distances.

The subject site is connected to local roading which intersects State Highway 79 approximately 300 m from the proposed access to the subject site. Any residential development at the site will require a new road to be established to allow for vehicular access to all sites. This roading will be designed to efficiently move residents from the new development to the existing road network as required (including pedestrian and bike access).

It is considered that as the FDA is located close to existing road networks and will result in a consolidated and logical design, that the additional roading proposed at the site will not result in trips that are longer than necessary.

Question 7: Natural Hazards: *Is the subject site associated with the submission free from inappropriate risk from a natural hazard event, if not what is the appropriate management response – including avoidance.*

As the site is identified within a Flood Hazard overlay, Environment Canterbury has prepared a Flood Hazard Assessment (**Appendix 5**) of the site. This report concluded that “Overall, flooding at the property can be described as low risk and therefore development should be permitted under the District Plan rules relating to natural hazards”.

A geotechnical assessment of the site has also been undertaken (**Appendix 6**). This report concluded that “The site is considered geotechnically suitable for the proposed development subject to carrying out site-specific geotechnical testing”.

Overall, the assessment above concludes that the site is not subject to inappropriate risk from natural hazards, and is suitable for residential development, subject to developed design.

Proposed District Plan

Question 8: Proposed District Plan: *Does the urban growth / rural lifestyle development (and or sequencing) contribute to a consolidated and integrated settlement pattern, achieve a coordinated pattern of development and is capable of integrating with the efficient use of infrastructure?*

The development of FDA3 will result in a consolidated and co-ordinated urban form, given the subject site’s location in relation to existing the urban area and established services.

FDA3 is located on the immediate north western fringe of Geraldine and the sequencing of development will not be dissimilar to that of the existing subdivision to the west of the site that is currently being developed for residential purposes. The Engineering Servicing Memorandum (**Appendix 3**), prepared by Davis Ogilvie, covers matters of infrastructure servicing in more detail.

Question 9: Growth Rezonings / Amendments to SCHED-15: *Given the updated residential capacity projections in Attachment A, how does the proposal, either individually or in combination with those areas identified in the PDP, concentrate and promote a coordinated pattern of development. How is the rezoning sought (or change in FDA sequencing) required to ensure ‘sufficient development capacity’?*

The subject site has already been identified as appropriate for residential development and is identified as a priority future residential development area (5 years). The change in FDA sequencing to less than 5 years

will not inhibit 'sufficient development capacity', but will instead allow the initial stages of development to commence in a timely manner. Both other FDA areas within Geraldine have a future capacity limitation – for the next ten years. Should demand be required, this reduction in sequencing will allow development to respond to the market.

Given the location of FDA3 in relation to existing residential development, and that this would be the first FDA to be developed (if all FDA areas are developed in sequence in terms of priority), the proposal will allow for an ongoing and coordinated approach to development that is not out of keeping with existing urban development in the area.

For General Industrial Zone

Question 10: Growth Rezonings / Amendments to SCHED-15: *Given the Industrial land capacity projections, how does the proposal, either individually or in combination with those areas identified in the PDP, concentrate and promote a coordinated pattern of development. How is the rezoning sought (or change in FDA sequencing) required to ensure 'sufficient development capacity'?*

Not applicable

Infrastructure and integration with land use

Question 11: Service Provision: *Identify (in conjunction with the requirements of Attachment B) how the future servicing needs of the area and the provision of adequate, coordinated and integrated infrastructure to serve those needs, including how using water sensitive design to manage stormwater will be undertaken.*

The Engineering Servicing Memorandum (**Appendix 3**) notes that in any instance (ie now, or 5 years time) for the FDA to be developed, extensions and upgrades will be required to the potable and wastewater networks to ensure that adequate pressure and capacity is available within the system to service the proposed development.

The concept design and Engineering Servicing Memorandum also identifies stormwater reserves as suitable to support stormwater management of the site. All internal servicing of the site will be carried out in accordance with industry best practice methodology, and bringing development forward will have no adverse impact in this regard.

Question 12: Infrastructure integration: *Identify whether the rezoning if not required for 'sufficient development capacity' would result in wider issues for the district in terms of integration with infrastructure planning and funding decisions, or where for Rural Lifestyle Rezoning has consequences for overall yield / density and servicing requirements.*

As identified in Question 11 above, for any residential development to occur at the subject site, upgrades will be required to potable and wastewater systems in order to provide an acceptable level of service to the proposed residential development. This is not anticipated to result in significant wider issues within the district.

Question 13: Hazards: *Demonstrate with reference to suitable standards, the avoidance and / or management of inappropriate natural hazard risk, and suitable geotechnical conditions.*

As described in Question 7 above, an initial flood hazard assessment and geotechnical assessment has been undertaken for the subject site (**Appendix 5** and **Appendix 6** respectively).

These assessments have indicated that the site is suitable for residential development, subject to detailed design.

Transport

Question 14: Transport network integration: *Demonstrate with reference to suitable standards and the potential yield / density of development – the safe and efficient functioning of the supporting transport network, ability to facilitate modal choice, and consolidating an accessible urban form.*

The Engineering Servicing Memorandum (**Appendix 3**) identifies that carriageway improvements will be required to accommodate the additional traffic movements generated by the increase in residential development. The report also notes that an “*Integrated Transport Assessment (ITA) will need to be carried out in order to address of increased traffic, implications on the efficiency, effectiveness and safety of the wider network fully*”. Bringing forward development of the site will have no detrimental effect on the existing or proposed traffic network around the site.

Environmental values

Question 15: Existing Environment and characteristics: *Identify the following as relevant to the submission:*

- (a) The existing lawfully established land use(s) as they relate to the area that is subject to the submission, including: density (and existing fragmentation of sites), amenity and character, and range of uses.*
- (b) Geophysical boundaries that would distinguish zone boundaries, including how the proposal would result in the contiguity of existing urban areas (proximity and agglomeration of existing urban areas).*
- (c) Existing resource consents that provide for established land uses, including alignment with the anticipated outcomes associated with the submission.*

The site is currently utilised for a lifestyle block form of farming with one dwelling existing on site. The property is currently semi rural in character and comprises paddocks and is traversed by a waterway. The proposed layout and detailed design of the site will be sensitive to both of these existing features.

Question 16: Environmental Values: *Where the site incorporates or adjoins any of the following as notated within the PDP:*

- (a) Specific values associated with Landscape values and natural character.*
- (b) Biodiversity constraints.*
- (c) Cultural and / or Heritage values.*
- (d) Existing or permitted Intensive Farming Activities, Rural Industry or other established Rural that could generate incompatible land uses with the submission outcome.*

The site is not located within an area of natural significance, biodiversity overlay, or is identified for cultural or heritage values. These matters do not constrain the site nor are there any incompatible use matters that

would arise as a result of altering the sequencing and timing of the FDA requirement.

Submitters shall provide information as to whether any additional standards, rules or methods (other than those already contained within the respective zone standards) are required to maintain or enhance any specific attribute, value or effects. This shall include where specific features or attributes should be retained through subsequent subdivision, use or development.

No specific additional standards, rules, or methods have been considered as part of this additional report memo, however, it is acknowledged that it may be appropriate to generate site specific rules and methods such as the provision of an outline development plan to ensure that future development proceeds in a prescribed manner, providing certainty for both Council and the community.

Specific matters

Question 17: Submitters shall provide information and analysis on the specific matters identified, noting that these may well overlap with Questions 1 – 16 above.

All of the relevant specific matters and information requirements have been included in earlier sections of this report memo.

4 CONCLUSION

Overall, the submitter is supportive of the proposed FDA3 overlay under the Proposed Timaru District Plan. The site is located within an established residential area and is considered appropriate for future residential development. However, the submitter requests that the sequencing of the FDA provisions be reduced from 5 years, given that concept plans and investigations for the development are already underway and the submitter wishes to be in a position to commence development more rapidly than anticipated by the current Proposed Plan.

Additional information has been provided regarding the NPS-UD, as well as engineering comment with regard to natural hazards, transport, and infrastructure.

Given that the site has been found to be appropriate for residential development, and the PDP has identified, by way of the priority given to the site in sequencing, there is no reason why the site should not be immediately rezoned to Residential, without the FDA constraint that has the potential to hold up development and result in increased costs to be incurred resulting in increased housing costs and reduced choice for the community.

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 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.

5 ATTACHMENTS

- Appendix 1 – Table 1 Checklist for Submitters
- Appendix 2 – Conceptual Development Plan
- Appendix 3 – Engineering Service Memorandum
- Appendix 4 – Highly Productive Land Assessment
- Appendix 5 – Flood Assessment
- Appendix 6 – Geotechnical Assessment
- Appendix 7 – Novo Group – Planning Advice on NPS-UD

APPENDIX 1

Table 1 Checklist for Submitters

Table 1: Checklist for Submitters

Consideration	Question (Sections 7 – 11)		Check
<i>'Give effect to'</i> NPS-UD (Section 7)	Question 1:	What is the contribution of the rezoning (or amendment in timing associated with SCHED-15 (FDAs)) in terms of the provision (residential / rural lifestyle – yield, density; and business- area) in relation to the Council's provision of 'at least' sufficient development capacity (Policy 2) given the Property Economics analysis (Section 8)?	<input type="checkbox"/>
	Question 2:	For residential and business rezonings how would the rezoning (or amendment in timing associated with SCHED-15 (FDAs)) contribute to 'well-functioning urban environments' (Objective 1 and Policy 1) and align with responsibilities of the Timaru District Council to ensure decisions on urban development that affect urban environments are integrated with infrastructure planning and funding decisions (Objective 6)?	<input type="checkbox"/>
<i>'Give effect to'</i> NPS-HPL (Section 7)	Question 3:	Urban Rezonings: Demonstrate consideration and alignment with the requirements of the NPS-HPL Clause 3.6. for any submission for an urban rezoning (GRZ or GIZ) where the exemptions in 3.5(7)(b) are not applicable.	<input type="checkbox"/>
	Question 4:	Rural Lifestyle Rezonings: Demonstrate consideration and alignment with the requirements of the NPS-HPL Clauses 3.7 and 3.10 for any submission that requests a Rural Lifestyle rezoning (RLZ) where the exemptions in Clause 3.5(7)(b) are not applicable.	<input type="checkbox"/>
<i>'Give effect to'</i> Canterbury Regional Policy Statement (Section 7)	Question 5:	Growth Rezonings / Amendments to SCHED-15: Does the proposal, either individually or in combination with those areas identified in the PDP concentrate and promote a coordinated pattern of development (referencing capacity provided in Section 8 of this report).	<input type="checkbox"/>
	Question 6:	Energy efficiency: Does the proposal assist in maintaining an urban form that shortens trip distances.	<input type="checkbox"/>
	Question 7:	Natural Hazards: Is the subject site associated with the submission free from inappropriate risk from a natural hazard event, if not what is the appropriate management response – including avoidance.	<input type="checkbox"/>
<i>'achieve and implement'</i> Proposed District Plan (Section 7)	Question 8:	Proposed District Plan: Does the urban growth / rural lifestyle development (and or sequencing) contribute to a consolidated and integrated settlement pattern, achieve a coordinated pattern of development and is capable of integrating with the efficient use of infrastructure?	<input type="checkbox"/>
For Residential / Rural Lifestyle submitters (Section 8)	Question 9:	Growth Rezonings / Amendments to SCHED-15: Given the updated residential capacity projections in Attachment A , how does the proposal, either individually or in combination with those areas identified in the PDP, concentrate and promote a coordinated pattern of development. How is the rezoning sought (or change in FDA sequencing) required to ensure 'sufficient development capacity'?	<input type="checkbox"/>
For General Industrial Zone (Section 8)	Question 10:	Growth Rezonings / Amendments to SCHED-15: Given the Industrial land capacity projections, how does the proposal, either individually or in combination with those areas identified in the PDP, concentrate and promote a coordinated pattern of development. How is the rezoning sought (or change in FDA sequencing) required to ensure 'sufficient development capacity'?	<input type="checkbox"/>
Infrastructure and integration with Land use	Question 11:	Service Provision: Identify (in conjunction with the requirements of Attachment B) how the future servicing needs of the area and the provision of adequate, coordinated and integrated infrastructure to serve those needs,	<input type="checkbox"/>

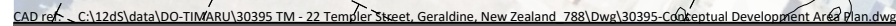
(Section 9)		including how using water sensitive design to manage stormwater will be undertaken.	
	Question 12:	Infrastructure integration: Identify whether the rezoning if not required for 'sufficient development capacity' would result in wider issues for the district in terms of integration with infrastructure planning and funding decisions, or where for Rural Lifestyle Rezoning has consequences for overall yield / density and servicing requirements.	<input type="checkbox"/>
	Question 13:	Hazards: Demonstrate with reference to suitable standards, the avoidance and / or management of inappropriate natural hazard risk, and suitable geotechnical conditions.	<input type="checkbox"/>
Transport (Section 9)	Question 14:	Transport network integration: Demonstrate with reference to suitable standards and the potential yield / density of development – the safe and efficient functioning of the supporting transport network, ability to facilitate modal choice, and consolidating an accessible urban form.	<input type="checkbox"/>
Environmental Values (Section 10)	Question 15:	<p>Existing Environment and characteristics: Identify the following as relevant to the submission:</p> <p>(a) The existing lawfully established land use(s) as they relate to the area that is subject to the submission, including: density (and existing fragmentation of sites), amenity and character, and range of uses.</p> <p>(b) Geophysical boundaries that would distinguish zone boundaries, including how the proposal would result in the contiguity of existing urban areas (proximity and agglomeration of existing urban areas).</p> <p>(c) Existing resource consents that provide for established land uses, including alignment with the anticipated outcomes associated with the submission.</p>	<input type="checkbox"/>
	Question 16:	<p>Environmental Values: Where the site incorporates or adjoins any of the following as notated within the PDP:</p> <p>(a) Specific values associated with Landscape values and natural character.</p> <p>(b) Biodiversity constraints.</p> <p>(c) Cultural and / or Heritage values.</p> <p>(d) Existing or permitted Intensive Farming Activities, Rural Industry or other established Rural that could generate incompatible land uses with the submission outcome.</p> <p>Submitters shall provide information as to whether any additional standards, rules or methods (other than those already contained within the respective zone standards) are required to maintain or enhance any specific attribute, value or effects. This shall include where specific features or attributes should be retained through subsequent subdivision, use or development.</p>	<input type="checkbox"/>
Specific Matters (Section 11)	Question 17:	Submitters shall provide information and analysis on the specific matters identified, noting that these may well overlap with Questions 1 – 16 above.	<input type="checkbox"/>

APPENDIX 2

Conceptual Development Plan

Notes:

- All dimensions in metres unless shown otherwise;
- Proposed zoning is General Residential Zone 'GRZ' and that the different 'subdivision zones' should be read in conjunction with the memo dated 18/02/2025.



APPENDIX 3

Engineering Service Memorandum

MEMORANDUM REPORT

To: Timaru District Council
Applicant: Warren and Elizabeth **Scott**
From: Selwyn Chang – Principal Civil Engineer
Date: 18 February 2025
Subject: Infrastructure Servicing Assessment

1 INTRODUCTION

The purpose of this report is to outline the concept infrastructure servicing assessment which are integral to residential development of the proposed site located at 22 Templer Street, RD22, Geraldine. The land is about 10.46 hectares being legally described as Lots 1-6 Deposited Plan (DP) 16535, Part Lot 70 DP 3285 and Part Lot 22 DP2717 respectively as shown in Figure 1.



Figure 1: Proposed Site

The concept residential development layout is as shown in Figure 2 with potential to accommodate up to 100 residential allotments.

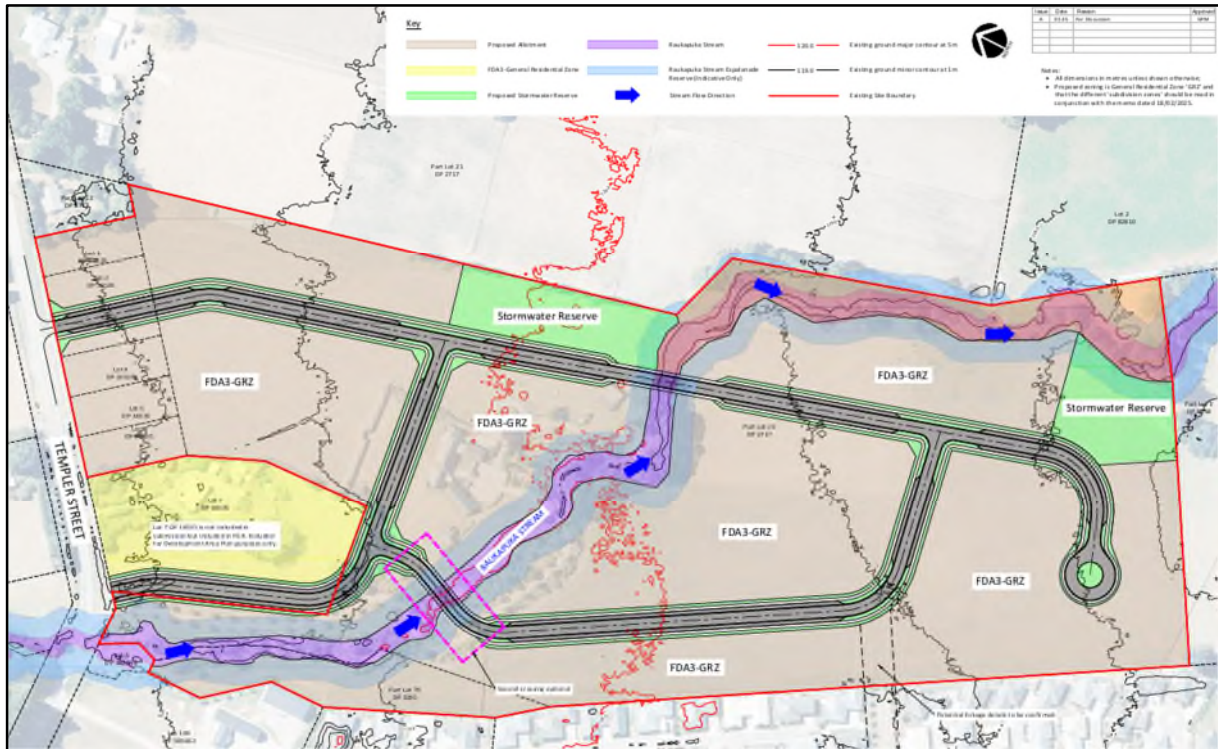


Figure 2: Concept Residential Development Layout

2 SERVICE PROVISION AND INFRASTRUCTURE INTEGRATION

2.1 Portable Water Supply

There is public water network close by to service the proposed site both at Templer Street and Connolly Street. There is DN250 AC trunkmain across the proposed site but will likely not allow to be utilised for connection for the proposed site. The water network will need to be extended approximately 120m to 170m in order to service the site as shown in Figure 3.

There is easement right to convey water in favour of Timaru District Council created across Lot 2 DP 535668 to allow the extension of the network within the property to service the proposed site.

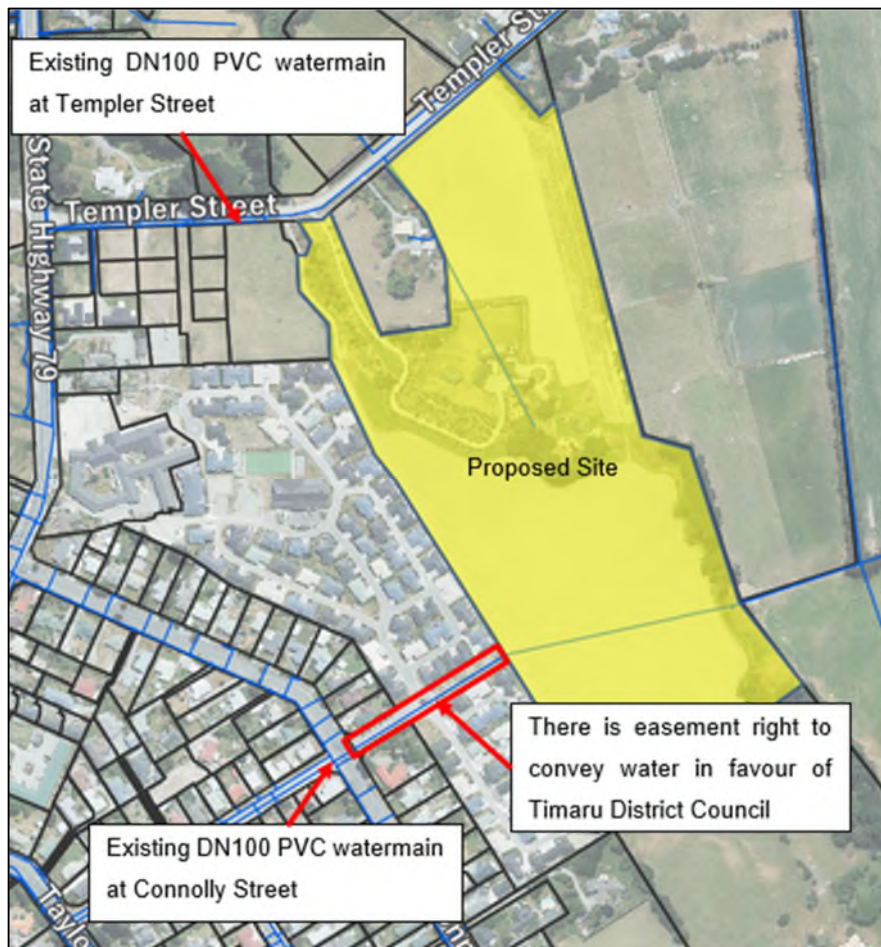


Figure 3: Proposed Potential Water Supply Connection

Within the public water supply network, the extension of the network would likely have insufficient pressure capacity to deliver the required minimum fire-fighting pressure capacity to the proposed site.

This can be mitigated with a proposed public booster pump station to provide additional pressure to be able to meet the firefighting requirements.

2.2 Wastewater

There is public wastewater network close by to service the proposed site both at Templer Street and Connolly Street. The wastewater network will need to be extended approximately 150m to 200m in order to service the site as shown in Figure 4.

There is easement right to convey wastewater in favour of Timaru District Council created across Lot 2 DP 535668 to allow the extension of the network within the property to service the proposed site.

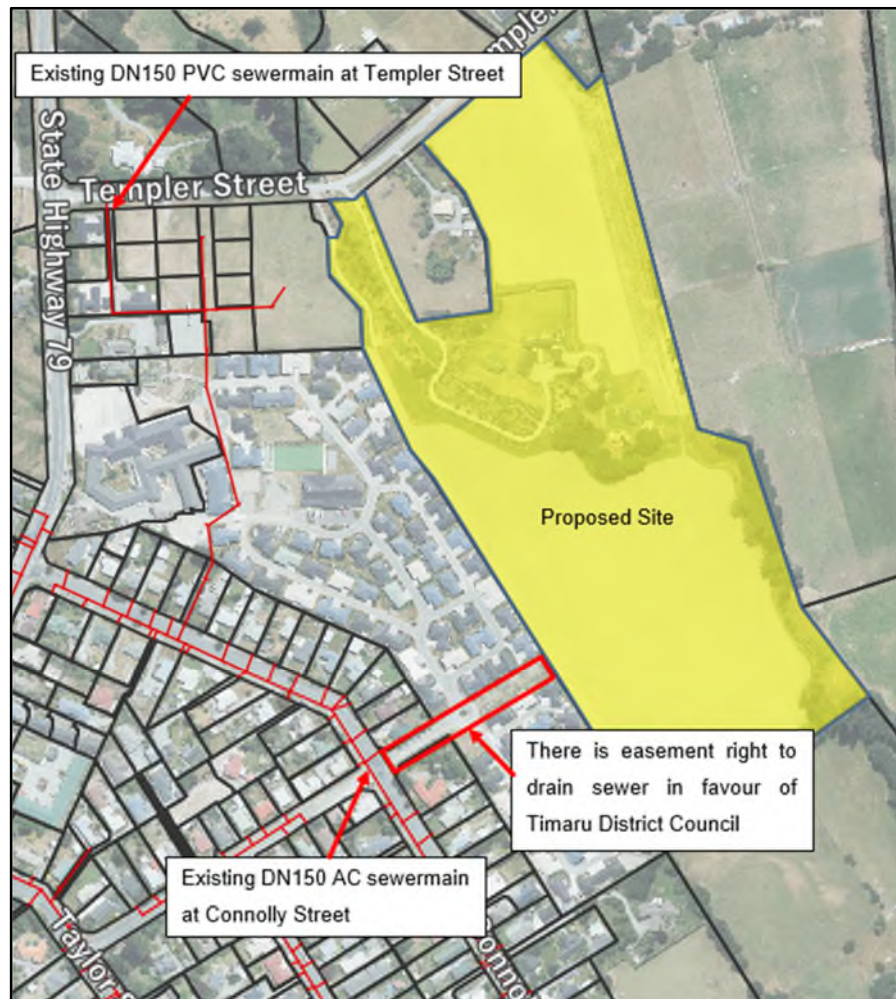


Figure 4: Proposed Potential Wastewater Connection

The existing wastewater network pipe depth at the point of connections for both Templer Street and Connolly Street are considerable shallow (less than 1.5m) and unlikely to be extended for a fully gravity wastewater network due to insufficient pipe cover to meet Council standards and Building Code. For the development to have gravity wastewater system, a communal pump station is required to pump into rising main that will be connected to public wastewater network. Alternatively, a low-pressure network system within the development could similarly mitigate these issues.

2.3 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 will manage post-development stormwater runoff.

Raukapuka Stream (ECAN stream) traverse across the proposed site and the ground conditions

may be suitable to be discharge to ground. Both of the discharge options could be utilised for stormwater management system for the development.

The proposed site is likely to discharge stormwater both to the ground and/or to ECAN's stream and therefore will require stormwater management plan and resource consent to be obtained for the discharge to the ground and/or to ECAN's stream.

2.4 Electricity

Alpine Energy has confirmed the site can be serviced for power.

2.5 Telecommunication

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

3 HAZARD INFORMATION

3.1 Liquefaction Assessment

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

3.2 Flood Hazard Assessment

Flood Hazard assessment have been carried out by ECAN and 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, stormwater management from the development, management of overland flowpath and Raukapuka Stream can contribute to mitigate the floodwater issues and not creating any adverse impact downstream.

4 TRANSPORT NETWORK INTERGRATION

Currently the legal access for the proposed development will be linkages from Templer Street. It is envisaged there is potential linkages to extend Lancaster Street to connect to the development however legal access rights will need to be sought.

Potential 1000 household trips per day that could be generated (Flat Urban Areas, 10 trips/household/day) from the proposed development.

From Mobileroad website, the surfacing is two coated chip seal (Grade 4/6) on 5.4m width road

carriageway. Road widening will be required to accommodate the increased traffic. There is 20m width road reserved which is sufficient for urban local road design including footpath on both sides that will be suitable for the increased traffic and pedestrian trips.

Since the development is close to the peripheral of the urban road network, it is anticipated to be easily integrated to the transport network. Integrated Transport Assessment (ITA) will need to be carried out in order to address of increased traffic, implications on the efficiency, effectiveness and safety of the wider network fully.

5 CONCLUSION

There are public services (water and wastewater, electricity, telecommunication and transport) to the proposed residential site that is able to be serviced and integrated. Engineering solutions are practical and applicable to mitigate and address any of the capacity issues.

In addition, the site has low hazard risks on both liquefaction and flood hazards and is suitable for residential development.

APPENDIX 4

Highly Productive Land Assessment

Our Reference: J17296

4 February 2025

Aaron Hakkaart
Planning Manager
District Plan Review
Timaru District Council

Email: aaron.hakkaart@timdc.govt.nz

Dear Aaron,

Subject: District Plan Review – Urban Growth: NPS-HPL Consideration Scott Submission 128.2

The **purpose** of this letter is to respond to the e-mail request from Lauren Roycroft at Davis Ogilvie dated 29 January 2025.

The request sought confirmation as to the consideration of the Scott submission (Sub 128.2, Geraldine) as it related to the s42A Officer Memorandum dated 21 January 2025 (**the Memo**).

The Memo provided a preliminary and without prejudice consideration of the application of the National Policy Statement – Highly Productive Land (**NPS-HPL**) to the urban growth submissions received on the Proposed District Plan (**PDP**); and where the NPS-HPL were to apply, the relevant NPS-HPL pathway for the submitter to consider.

The Memo reiterated statements in the preliminary s42A Report (dated 29 October 2024) that the onus remained on submitters to obtain legal and / or planning advice on the application of the NPS-HPL (and NPS-UD).

In terms of a **discussion**, the Scott submission to the PDP seeks:

- as the primary relief retention of Future Development Area 3 (FDA3); and
- an alternative relief where the development of the site in accordance with the General Residential zoning (**GRZ**) could be undertaken (presumably that the site be rezoned as GRZ immediately).

The site as subject to the Scott submission (**the site**) is zoned as Rural 2 and Rural 1 in the operative Timaru District Plan. Under the PDP, the site is zoned General Rural zone, as notated with the FDA3 Overlay.

Schedule 15 (SCHED15) identifies Future Development Area 3 as anticipated General Residential Zone with a DAP timeframe as 'Priority Area' 5 years.

The site is notated as comprising Land Use Capability Class 2 soils as mapped by the New Zealand Land Resource Inventory. The site is identified in the Growth Management Strategy Residential Review (2022) as 'live zoning'¹.

Accordingly, in terms of the application of the NPS-HPL Clause 3.5(7), whilst the site is identified as LUC Class 2 land in terms of the application of Clause 3.5(7)(a)(ii), the land is identified as 'live zoning' for 'urban' development within a strategic planning document, being the GMS Residential Review 2022; and the mapped boundaries are identified at a sufficient level of detail to enable the cadastral boundaries to be identified in practice.

Accordingly, the site is able to meet the exemption from the transitional definition of Highly Productive Land under Clause 3.5(7)(b)(i) and it is assumed that the NPS-HPL does not apply to this land.

Yours faithfully

PLANZ CONSULTANTS LTD

A handwritten signature in blue ink, appearing to read 'Matt Bonis', with a long, sweeping underline.

Matt Bonis

Partner

DDI: 021 79 66 70

EMAIL: matt@planzconsultants.co.nz

¹ Timaru District GMS Review Residential (2022) [Section 9.4(d), Figure 4].

APPENDIX 5

Flood Assessment

24 February 2025

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

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PO Box 550
Timaru 7940
P. 03 687 7800
F. 03 687 7808
E. ecinfo@ecan.govt.nz
Customer Services
P. 0800 324 636
www.ecan.govt.nz

Dear Lauren

**Flood Hazard Assessment – Proposed Large scale Subdivision
22 Templer Street, Geraldine
1-6 DP 16535 PT LOT 70 DP 3285 PT LOT 22 DP 2717, Valuation No: 24660-519-01**

This 10.46-ha property is located on the south side of Templer Street, 600m east of the Waihi River and is traversed by the Raukapuka Stream. An existing dwelling is located roughly 20 metres northeast of Raukapuka Stream in roughly the centre of the property, with the remainder of the property currently vacant. You have requested an initial assessment of flood risk at the property regarding potential subdivision and development of up to 100 residential allotments at the property.

Historical Flood events and Modelling

Environment Canterbury records of the 13 March 1986 flood indicate that upstream breakouts from the Waihi River, combined with other local runoff, flowed into the Templer Street area via Raukapuka Stream and other swales (historic flow paths) and depressions in the area. Mapping of this event indicates that most of the property avoided flooding in this event, though the areas within and adjacent to the swales and creek did experience flooding. Attached to this letter are several photographs taken during this event which provide some context around the scale of the flooding in this event. Note most of the photographs aren't taken at the peak of the flooding. That flood had a peak flow in the Waihi River at Geraldine of 300 cumecs and a nominal Average Recurrence Interval (ARI) of 70 years.

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

The Orari-Waihi-Temuka Floodplain Study (Report 93(12)). Indicates that the property is floodable from upstream breakouts from the Waihi River in the 100-year ARI event and larger. The property is relatively flat outside of the Creek and other prominent depressions and as such flooding is likely to be widespread across the property, but relatively shallow. It should be noted however that as the size of the flood increases, so too will depths.

Another consideration is the influence of runoff and stormwater flooding. Modelling undertaken by WSP Ltd on behalf of Timaru District Council indicates that swales and the channels on the property can expect up to 600 mm deep flooding in a 200-year ARI rainfall event, but most areas of the property will remain clear of significant runoff. Significant changes to these channels via earthworks associated with major developments may result in changes to the pattern of flows and may therefore impact depths across the property.

Other considerations

Key Ref: 25017

Contact: Oliver Hermans

Development has occurred in and around the site and wider area since the 1986 flood. This includes residential development and infilling of some swales and flow paths. This will have the effect of disrupting the previous flow paths and limiting the rate of infiltration of water following major flood/rainfall events. As more of the land is developed for residential purposes, the volume of permeable land will decrease.

The proposed development may influence the passage of floodwaters through the area during major flood events and any alterations of channels or depressions should be carefully considered from that perspective.

It is critical that any development, especially on the scale of what is proposed take the above into account and make accommodations for these factors. 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 events and the design managed regarding these factors.

The operative Timaru District Plan requires that the minimum floor height required for new dwellings is at the expected 200-year ARI flood level. Based on the information available to Environment Canterbury, all of the property can be considered vulnerable to at least some shallow flooding in an event of that size. Greater depths will occur in lower areas around channels and waterways. The proposal may (due to its density) impact on the passage of floodwater through the area and the depth of flooding in localised areas.

Should development of this scale occur, then Environment Canterbury can assist with determining appropriate floor levels to accommodate this standard, though it is likely that all dwellings would require at least moderate elevation of the floor. As indicated modelling specific to the development may be required to achieve this effectively.

Predicting site-specific flooding is not an exact science and requires many assumptions.

Overall, flooding at the property can be described as low risk and therefore development should be permissible under the District Plan rules relating to natural hazards, provided that the flow of floodwaters through the area and flood depths are addressed

You should also note that Raukapuka Stream is included in Environment Canterbury Flood and Drainage Protection Bylaw (2013). The bylaw is a free, permissions (non-consent) based process whereby proposed works within 7.5 m of the Raukapuka Stream channel require approval by Environment Canterbury rivers staff. The purpose of the bylaw is to protect drainage or stream features that provide benefit to the broader area in flood protection or drainage. Find more information about the bylaw here: <https://www.ecan.govt.nz/your-region/your-environment/river-and-drain-management/flood-protection-and-drainage-bylaw/>

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

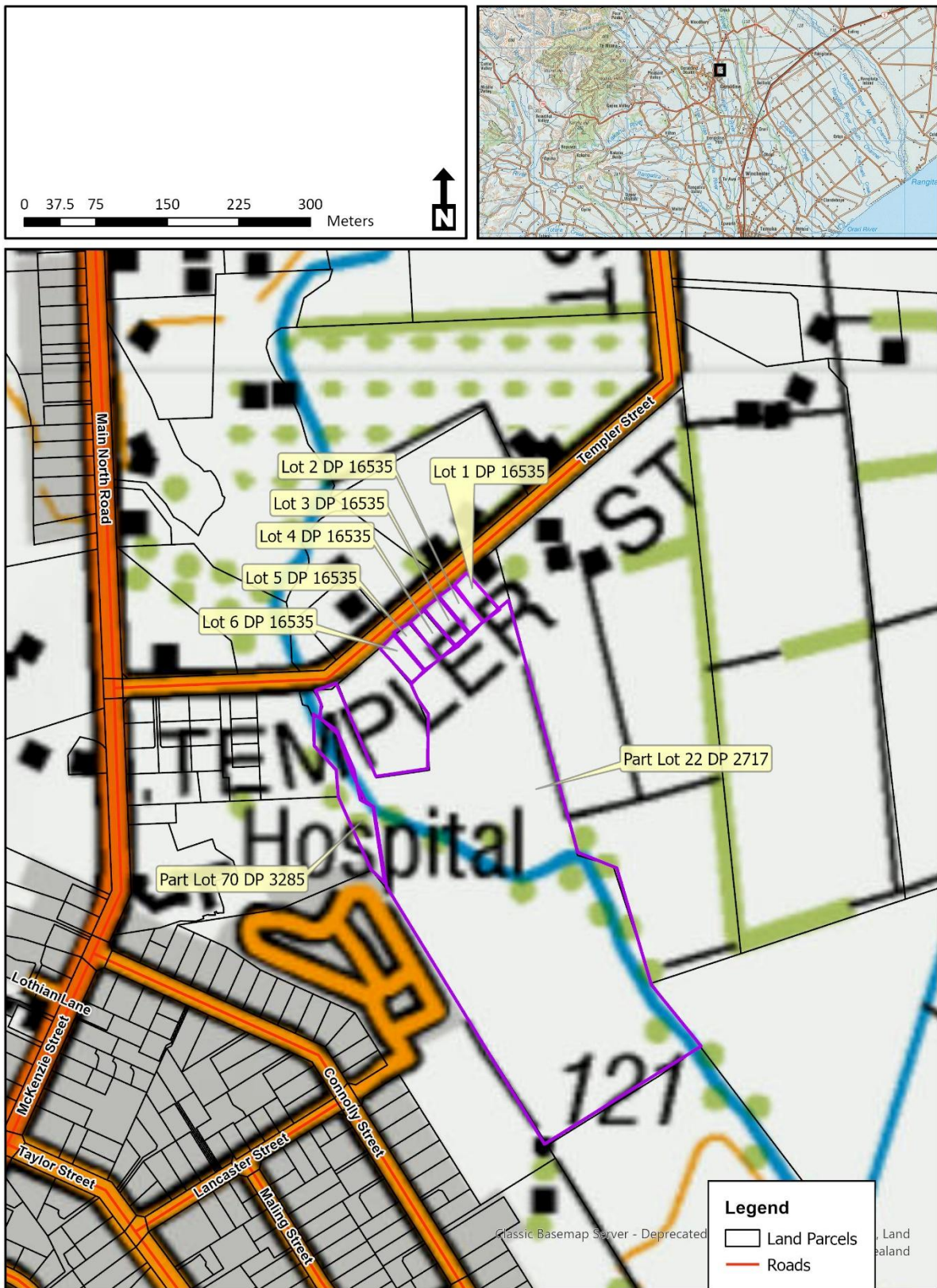
Scientist (Natural Hazards)

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

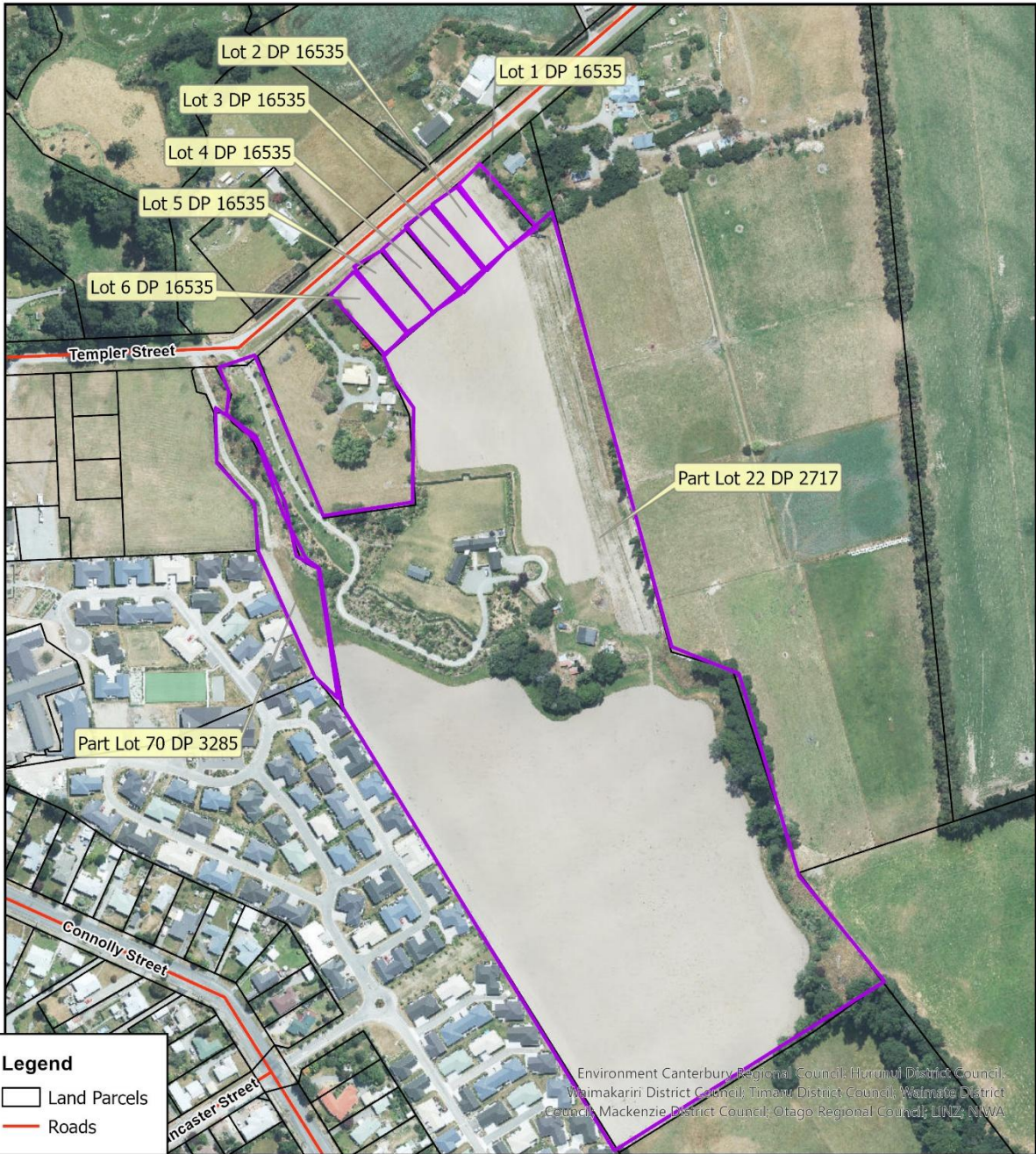
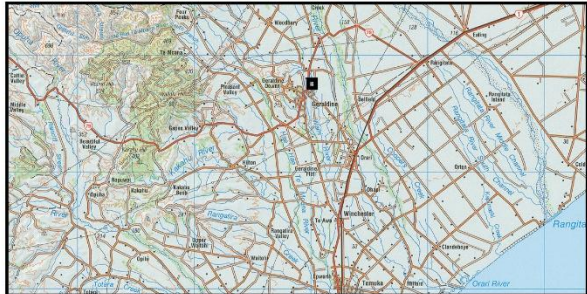
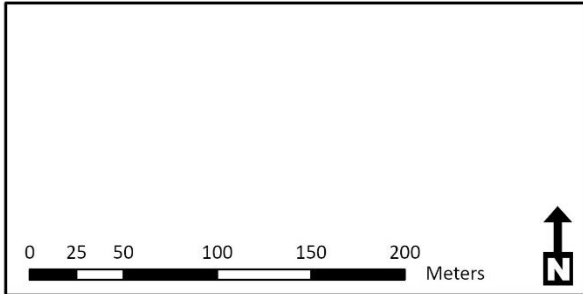
Attachments:

- Topographic map showing location of property
- Aerial photograph of the property
- Site Plan (provided by applicant)
- Photographs - 13 March 1986 - Waihi River

22 Templer Street, Geraldine - Topo

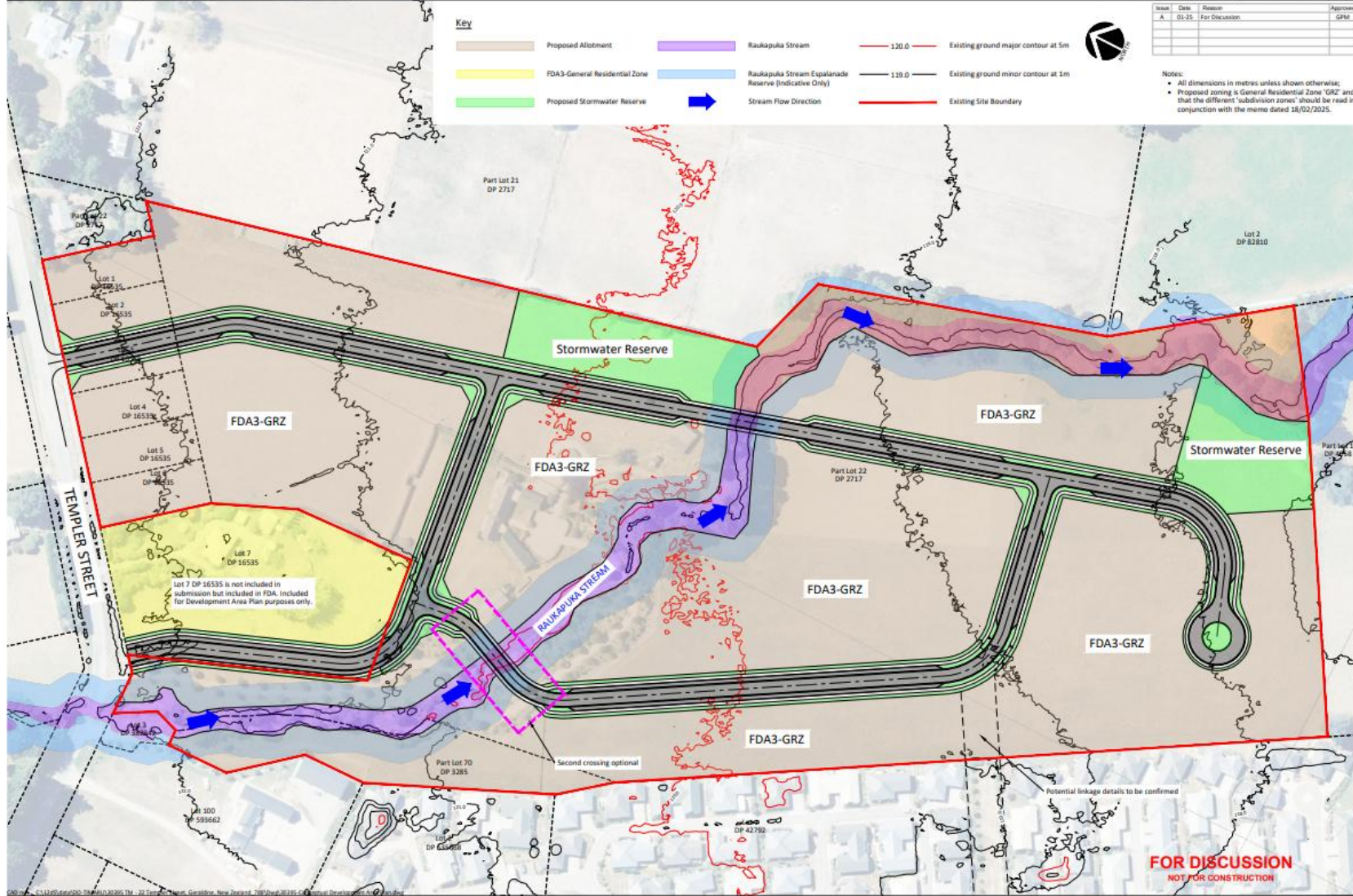


22 Templer Street, Geraldine - Aerial



Disclaimer: This document shall only be reproduced in full with approval from a Davis Oplive Engineer or Surveyor

Contractor to locate all existing services & verify all dimensions before commencing work



Davis Oplive (Australia) & Partners Ltd
Engineers - Surveyors - Planners
12 The Terrace, Tisbury 7940
P.O. Box 958 Tisbury, NZ
Ph: 03 688 8352 / 0800 888 350
Also: Nelson, Christchurch, Greymouth

ELIZABETH MARGARET SCOTT & WARREN BAXTER SCOTT
22 TEMPLER STREET, GERALDINE

CONCEPTUAL DEVELOPMENT AREA PLAN

Design: RL
Scale @ A3: 1:1500
Drawn: RL
Date: 01-25
QA Check: GPM
File: 30395

DWG: PL01 A



cc by Environment Canterbury

Waihi River
View S over Nth
Geraldine & Sawmill

13.3.86 1300hrs+
J38 697 790.

After the peak

1.15.22.



cc by Environment Canterbury

Dobies Stream
View NE up Templar
Street, NE Geraldine
Orari River top RHS,
Dobies Strm water
top photo.

13.3.86 1300hrs+
K38 703 796

1.17.9.



Waihi RV.
View SSE from
Templer St to natural
drainage channel.
Water backed up
from overflow that
crosses SH72 by Mc
Kenzie Lodge carpark

13.3.86
J38 6980 7925
12043.

cc by Environment Canterbury



Waihi River
View N, from Templer
street, to natural
drainage channel,
C. Knox property.

13.3.86
J38 698 793

12045

cc by Environment Canterbury



Waihi River
View E? at natural
drainage channel
in R. Knox property.
Golden oak in fore-
ground.

13.3.86

J38 6975 7935

12046.

cc by Environment Canterbury



Raukapuka Stream
View N^m from
Templer St, up to
stream & overflow
on C. Knox property.

13.3.86 pm
J38 6984 7932

12051.

cc by Environment Canterbury

APPENDIX 6

Geotechnical Assessment

File No.: 45505

25 February 2025

Davis Ogilvie (Aoraki) Ltd.
12 The Terrace
TIMARU 7910

Attention: Lauren Roycroft

Email: lauren@do.nz

Dear Lauren,

**PRELIMINARY GEOTECHNICAL DESKTOP STUDY FOR 22 TEMPLER STREET, GERALDINE
(LOT 1-6 DP 16535, PART LOT 22 DP 2717 AND PART LOT 70 DP 3285, TITLE CB566/6) - REV A**

1.0 INTRODUCTION

Davis Ogilvie and Partners Ltd. (Davis Ogilvie) has prepared this geotechnical desktop study for the site located at 22 Templer Street in Geraldine, legally described as Lot 1-6 DP 16535, Part Lot 22 DP 2717, and Part Lot 70 DP 3285, respectively.

The 10.46 ha site is currently developed with a single-family residence and several farm storage buildings. Access to the site is via Templer Street to the north. A spring-fed creek, Raukapuka Creek, meanders in a northwest-southeast direction across the site. All existing structures are currently located near the central part of the site, on the northern side of the creek. The remainder of the site north of the main dwelling and south of the creek is pastureland.

It is understood that the proposed development of the site will include 79 residential units and associated infrastructure, including two stormwater reserves. The site will be accessed via Templer Street to the north and, potentially, Lancaster Street to the west. At least one crossing of the Raukapuka Creek is currently proposed.

2.0 EXISTING GEOTECHNICAL INFORMATION

Davis Ogilvie has completed a geotechnical desktop study review of available published resources. A summary of pertinent information as it relates to the site, site area, and proposed development is presented in Table 1.

Table 1: Summary of Geotechnical Information

Published Information		
Site Zone ¹	The site straddles three Zones: Residential 1 (Res 1), Rural 1, and Rural 2.	
Geology ² & Geohydrology ³	<ul style="list-style-type: none">Alluvial terrace or plain deposits: Variable mixtures of gravel, sand and silt.Groundwater: Recorded at approx. 4.4 m below Existing Ground Level (EGL) at ECan well K38/2179 located in the central part of the site, southeast of the main dwelling. The borelog recorded <i>silty/sandy round gravels</i> from ground surface to 11.4 m depth, clay to 12.6 m depth, and gravel to 25 m below EGL.	
Historical Land Use ¹	<p>Earliest available aerial photographs (1940-1949):</p> <ul style="list-style-type: none">Site used primarily for agricultural purposes, with farm storage buildings and a possible residential dwelling constructed immediately north of the creek. No notable changes to the site until sometime between 2015-2019. <p>2015-2019:</p> <ul style="list-style-type: none">A new dwelling and detached building were constructed to the north of the existing structures. No significant changes to the site since 2019.	
Nearby Geotechnical Investigation Data (simplified ground model) ⁴		
Soil Profile	0.0 – 0.5 m	TOPSOIL / FILL
	0.5 – 3.0 m	Firm to hard sandy SILT
	3.0 – 3.5 m +	GRAVEL* (* Gravel may be encountered at shallower depth on the site).
Groundwater	> 3.0 m below EGL.	
NZS 1170.5 Site Subsoil Class	Site Subsoil Class D	
Preliminary Natural Hazard Assessment		
Seismicity ⁵	Low risk. There are no mapped active fault(s) on the site. The nearest active fault, the Peel Forest Fault, is located approx. 20 km northwest.	
Subsidence	Low risk. Site is in a mapped area where “ <i>liquefaction damage is unlikely</i> ” ¹ .	
Erosion	The potential for erosion associated with the Raukapuka Creek must be assessed.	
Falling Debris & Slippage	Low risk. The site is located on generally level ground, therefore has no potential to create, or be affected by, falling debris or slippage.	
Flooding & Inundation	The site is susceptible to flooding, as evidenced during the March 1986 flood when the site was partially inundated due to the nearby Waihi River overtopping its banks ⁶ .	
Site Contamination ⁷		
Listed Land Use Register (LLUR)	At the time of this enquiry, the LLUR does not have any information about a Hazardous Activities and Industries List (HAIL) site on the land parcel. However, this does not confirm the site is not contaminated, particularly given its historical land use.	

¹ Canterbury Maps Viewer, <https://canterburymaps.govt.nz/help/map-viewer/>, accessed January 2025.

² Cox, S.C.; Barrell, D.J.A. (compilers) 2007. Geology of the Aoraki area. Institute of Geological & Nuclear Sciences 1:250 000 geological map 15. 1 sheet + 71 p. Lower Hutt, New Zealand. GNS Science.

³ Environment Canterbury (ECan) Regional Council, <https://www.ecan.govt.nz/data/well-search/welldetails/?WellNo=K38/2179>, accessed January 2025. Well (borehole) is used for irrigation, domestic and stockwater purposes.

⁴ Davis Ogilvie, Geotechnical Investigation and Assessment for Subdivision, Templer Street, Main Road. Project No. 32224. April 2014.

⁵ GNS Science. New Zealand Active Fault Dataset, <https://data.gns.cri.nz/af/>, accessed January 2025.

⁶ ECan Flood Hazard Assessment, Valuation No. 24752 024 04, dated 17 February 2014.

⁷ Listed Land Use Register (LLUR), <https://llur.ecan.govt.nz/home>, accessed 25 October 2024.

3.0 PRELIMINARY GEOTECHNICAL RECOMMENDATIONS

Based on this preliminary geotechnical desktop study, floodwater inundation and associated erosion is considered the most significant natural hazard to potentially affect the site. Davis Ogilvie notes that since the 1986 flood, improvements have been made to the Waihi River Scheme, which has included widening of the river, strengthening of the erosion protection works, and infilling of the historical channel. Timaru District Council (TDC) and ECan should be contacted for finished floor level (FFL) requirement.

The site is considered geotechnically suitable for the proposed development subject to carrying out site-specific geotechnical testing to identify suitable Building Location Areas (BLAs), assess the ground conditions and soil types, and confirm suitability for residential construction. This is likely to comprise mechanically excavated Test Pits, Hand Augers, Dynamic Once Penetrometer (DCP) and infiltration testing. The investigation should include a detailed assessment against Section 106 Natural Hazards of the Resource Management Act (RMA, 1991).

For preliminary design purposes, NZS 3604:2011 foundations are likely to be suitable for residential development at BLAs where 'Good Ground' is achieved, subject to FFL requirement indicated by ECan. Alternatively, specific engineering design will be required.

4.0 CLOSURE

Should you have any queries regarding this report or wish to discuss the next step in terms of geotechnical investigations for the proposed subdivision, please contact the undersigned.

Yours faithfully

DAVIS OGILVIE & PARTNERS LTD.



Prepared By:

RUSSELL MOLYNEUX

Senior Engineering Geologist

MSc, MEngNZ

Email: russm@do.nz



Reviewed By:

BJORN RAASCH

Principal Engineering Geologist

BSc (Hons), CMEngNZ (PEngGeol)

Email: bjorn@do.nz

Enclosed:

Conceptual Development Area Plan (Davis Ogilvie, Drawing PL01A, 01/2025).

Limitations

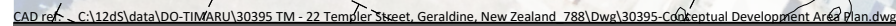
Davis Ogilvie did not complete an assessment of all possible conditions or circumstances that may exist at the site. The report and findings are based on readily available published resources and the information provided by the client. Conditions may exist which were not included in the resources. Variations in ground conditions may occur, and there may be conditions on site which have not been revealed or taken into account in this report. No warranty is included - either expressed or implied - that the actual conditions will conform to the assessments contained in this report.

Information included in this report was obtained / created from maps and / or data extracted from the New Zealand Geotechnical Database.

This report has been prepared solely for the purposes of Davis Ogilvie (Aoraki) Ltd. and their client. The information contained herein is confidential and shall not be passed on to any third party without prior written permission of Davis Ogilvie. No responsibility is accepted for any use outside the scope of this report.

Notes:

- All dimensions in metres unless shown otherwise;
- Proposed zoning is General Residential Zone 'GRZ' and that the different 'subdivision zones' should be read in conjunction with the memo dated 18/02/2025.



APPENDIX 7

Novo Group – Planning Advice on NPS-UD

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

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 450m² 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

M: 021 197 6585 | **O:** 03 365 5570

E: mona@novogroup.co.nz | **W:** www.novogroup.co.nz

1214002