

29 May 2025

ECONOMIC MEMORANDUM

To: Timaru District Council

c/- Matt Bonis

Partner

Planz Consultants

Email: matt@planzconsultants.co.nz

RE: RESPONSE TO SUBMISSIONS ON GROWTH CHAPTER (AS RELATED TO ECONOMIC MATTERS)

INTRODUCTION

My name is Timothy James Heath.

QUALIFICATION AND EXPERIENCE

I am a property consultant, market analyst and urban demographer for Property Economics Limited, based in Auckland. I established the consultancy in 2003 to provide property development and land use planning research services to both the private and public sectors throughout New Zealand.

I hold a Bachelor of Arts (Geography 1991) and a Bachelor of Planning (1993) from the University of Auckland. I have undertaken property research for 25 years, and regularly appear before Council, Environment Court, and Board of Inquiry hearings on economic land use matters.

I advise district and regional councils throughout New Zealand in relation to residential, retail, industrial and business land use issues as well as undertaking economic research for forward strategic planning, plan changes, district plan development and National Policy Statement on Urban Development 2020 (NPS-UD), National Policy Statement on Highly Productive Land 2022 (NPS-HPL), and residential and business land capacity modelling and implementation.

I also provide consultancy services to government ministries and a large number of private sector clients on a wide range of property issues, including economic impact assessments, market demand / supply analyses, development feasibilities, market growth forecasting, capacity modelling and economic cost benefit analysis.

CODE OF CONDUCT FOR EXPERT WITNESSES

While this matter involves a Council hearing under the RMA, I have approached this evidence on the basis that it is prepared in the same way as it would be for expert evidence in Environment Court proceedings.

I therefore confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and confirm that I have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise, except

where I have indicated that I am relying on others' opinions. I have not omitted material facts known to me that might alter or detract from my evidence.

BACKGROUND

The purpose of this Memorandum is to provide economic responses to those submission packages provided to the Timaru District Council (**TDC**) in reply to the requests specified in the Section 42A Hearing G – Growth Preliminary Report, dated 29 October 2024 (Preliminary Report)

The submission packages have been provided to support submissions that seek rezoning of land, the expansion or introduction of Future Development Areas (FDAs), or a change in sequencing associated with Future Development Areas (**FDAs**).

Analysis is also provided in response to those submissions from Waka Kotahi NZ Transport Agency [143.193] and the Canterbury Regional Council [183.166] where those submissions have requested removal of specific FDAs.

The attachment has grouped submissions by locations for ease of reference.

ASSESSMENT OF SUBMISSIONS

The assessment considers the district's obligations in terms of residential and industrial land sufficiency supply over the short (3 year), medium (10 year) and long (30 year) term timeframes within the framework of the NPS-UD, and associated certainty as to infrastructure provision and long-term strategic planning as associated with both existing the existing urban areas and Future Development Areas identified in the Timaru Proposed District Plan (**TPDP**).

Under the NPS-UD¹, Timaru District is a Tier 3 local authority. Tier 3 local authorities are '*strongly encouraged to undertake the functions of Tier 1 and 2 local authorities*', however such actions are not mandated². The NPS-HPL also contains specific requirements for Tier 1 and 2 local authorities that do not extend to Timaru District as a Tier 3 local authority³.

The Property Economics assessments (attached) of development capacity for both housing and industrial land has applied the competitiveness margins (short term – 20%, medium term – 20%, and long term – 15%) to its assessment of development capacity over and above expected demand, despite this not being mandated for Tier 3 local authorities.

In addition, in relation to the spatial extent relevant to considering sufficient development capacity:

- only Timaru settlement would meet the NPS-Definition of *urban environment* in the NPS-UD.
 - the analysis of the sufficient development capacity within the '*same locality and market*' while achieving a well-functioning urban environment is only mandated for

¹ NPS-UD Interpretation, Appendix.

² NPS-UD Clause 1.5

³ NPS-HPL, clause 3.6(4) only applies to non Tier 1 and 2 local authorities.

Tier 1 and 2 territorial authorities. NPS-HPL clause 3.4(4) applies to Tier 3 only allows urban rezonings of productive land (in amongst other conjunctive criteria) where:

the urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district:

The Property Economics development capacity assessment⁴ for housing land has considered each of the district's urban areas (Timaru, Temuka, Geraldine and Pleasant Point) as separate entities in terms of capacity and demand. The analysis therefore provides a consideration of planning decisions enabling a variety of homes that meet locational needs⁵, and also provides an assessment as to capacity within the *same locality and market* whilst achieving a well-functioning urban environment⁶.

The development capacity assessment for industrial land⁷ is considered at a district wide scale, as I consider that industrial land supply is focused on Timaru settlement and is more substitutable for other locations than housing demand. However, I have commented on specific demand and development capacity as relevant to submission packages below.

The focus in the responses to individual submissions considers the submission against the detailed development capacity assessments for housing and industrial land. That analysis demonstrates that there is more than sufficient development capacity than is required to meet both a medium and high forecast growth in demand over the medium term (10-year period).

I note a number of submitters have relied on a Benje Patterson report from 2022⁸. The objective of the report is to highlight what an aspirational economic future could look like for Timaru based on applying a range of growth assumptions and scenarios.

The "Better" scenario, which the author describes as ambitious and transformational, assumes that employment will grow 42% faster than its current trajectory (1.7% vs 1.2%) and productivity growth will double relative to its current growth rate. In order to fill these additional jobs, Timaru would have to grow by over 1,000 people per annum between now and 2050, and this would require 9,000 homes. For context, this is more than double the Stats NZ high growth projection.

While Property Economics fully supports the Council taking every step to bring a more productive and economically prosperous future to fruition, simply zoning for growth will not create demand as highlighted by the author who acknowledges achieving the "Better" scenario would require the district average long term migration levels to more than double.

Ultimately, the Patterson report is not a growth projection. The report represents a range of scenarios and what is required for those scenarios to be realised. The only reference I could find relating to land requirement was on page 10 where he indicates a minimum of 30ha is required by

⁴ Timaru District Residential Capacity Economic Assessment, Property Economics, October 2024

⁵ NPS-UD Policy 1(a)

⁶ NPS-HPL Clause 3.6(1)(b)

⁷ Timaru District Industrial Land Economic Assessment, Property Economics, May 2025

⁸ Scenarios of an Aspirational Economic Future for Timaru District, October 2022

2050 to accommodate 16,5000 additional workers. It is not clear how this calculation has been determined, but there is sufficient vacant zoned business land to accommodate the 30ha requirement identified.

At a macro level the costs and benefits of providing additional zoned (or FDA anticipated zoned) land above what is required to meet demand is as below.

- ⊕ Lower industrial / housing land prices.
- ⊕ Increased choice in location.
- ⊕ Increased certainty in future location of industrial / housing land provision to market
- ⊕ When coupled with directive district plan policy can disincentivise ad hoc, out of zone industrial / housing activity.
- ⊖ Possible inefficient infrastructure allocation – infrastructure is allocated to an area where it is not yet required or demanded, distributes community infrastructure over a wider area and inefficiently utilised.
- ⊖ Decreased impetus of intensified / efficient industrial land development

I understand that the district plan policy settings for Urban Form and Development (**UFD-01**) are to achieve consolidated and integrated settlement patterns that supports sustainable growth within existing urban areas, efficiently utilises infrastructure, and protects environmental and cultural values.

District plan objectives for outcomes associated with the efficient and effective infrastructure integration with urban and rural lifestyle growth (**EL-01, SD-O8, and SD-01(ii)**) are to ensure that new network infrastructure is coordinated with the timing and location of development, allows limited rural lifestyle growth near urban areas that can connect to infrastructure, and promotes a well-aligned, integrated development pattern.

As associated with those policy settings, and against a backdrop of sufficient existing development capacity (even without accounting for opportunities provided by the FDAs), the submissions, at a general level, represent either growth options or providing more responsive realisable growth (as associated with submissions seeking immediate rezoning of FDAs or a change in the DAP preparation process) that will neither assist in the consolidation of existing settlement patterns given forecast growth. They would result in inefficiency / duplication of infrastructure provision that is not integrated with achieving co-ordinated settlement patterns. The costs associated with inefficient and poorly timed infrastructure provision would be largely borne by the community rather than developers when considered across the broader network including maintenance and upgrades associated with servicing existing urban areas.

An additional industrial zoning that is proximate to existing industrial activities enable infrastructure investment to be more efficiently utilised and lowers marginal infrastructure cost⁹. This allows the district to accommodate industrial growth with reduced requirement to duplicate investment and resources in new infrastructure, and lowers ongoing infrastructure maintenance costs which are not

⁹ refers to the cost of producing one additional unit or service. Infrastructure in this instance.

covered by financial contributions. This ultimately reduces the financial burden on the community over the life of the asset and results in a more efficient use of infrastructure and its capacity.

Overall, I understand there is no statutory obligation for TDC to rezone additional residential or industrial land now for a potential requirement so far ahead into the future (beyond the life of this PDP), particularly when there is not infrastructure funding in place and the impacts on the cost to the community remain unknown.

Pleasant Point

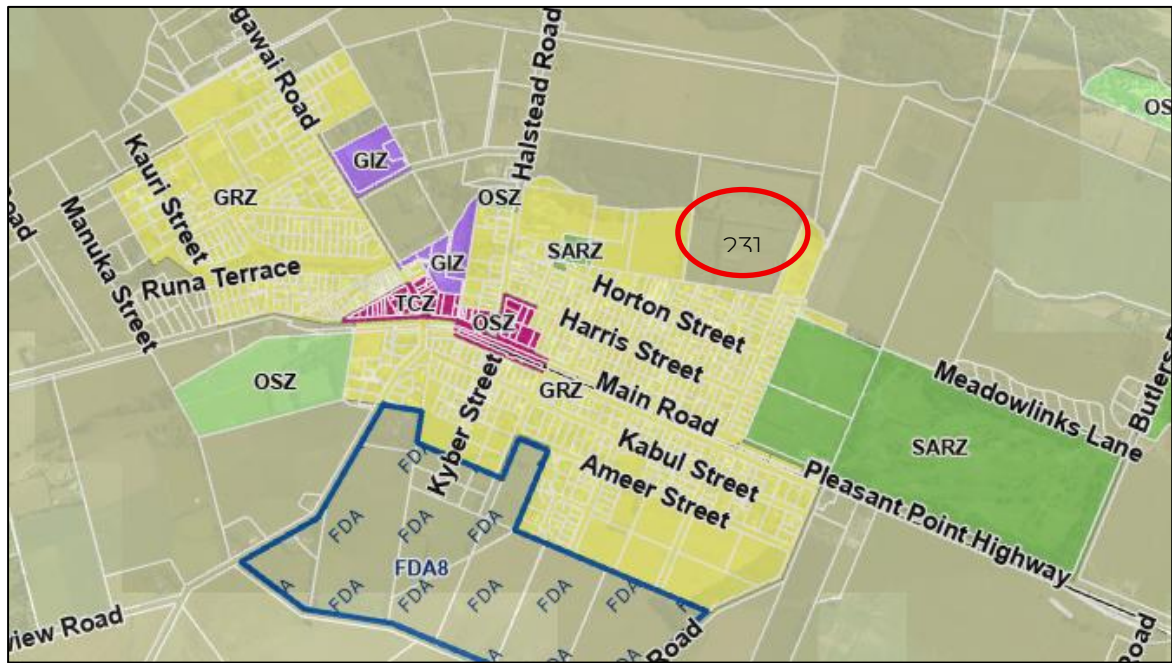
As identified in the Residential Capacity Economic Assessment (2024), under both a medium and high growth forecast, there is sufficient realisable capacity for housing to beyond 2053 (long term).

The table below shows for the High Growth forecast the demand / capacity balance for the short term, medium term and long term and identifies substantial sufficiency in capacity beyond 2053.

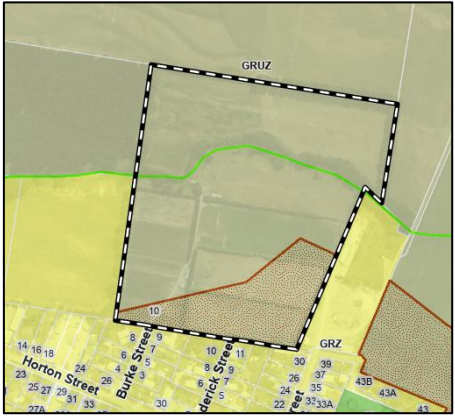
Capacity Required (High Growth)			Urban Capacity	Sufficiency without FDA			Future Development Areas (FDA)	Sufficiency with FDA (by 2053)
Short term (by 2026)	Medium term (by 2033)	Long term (by 2053)		Short term (by 2026)	Medium term (by 2033)	Long term (by 2053)		
40	111	254	301	261	190	47	79	126

Only one submission package has been received in relation to Pleasant Point.

Sub No.	Submitter	Address
231	T Blackler	10 Burke Street, Pleasant Point



Sub: 231	T Blackler	10 Burke Street, Pleasant Point
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<p>Submission and location:</p>	<p>Site size is 10.6ha.</p> <p>The submitter seeks to rezone the property at 10 Burke Street, Pleasant Point to a mix of General Rural or Open Space and General Residential.</p> <p>The submission package references provision of a residential care facility on the site, and that the two adjoining properties are residential in nature.</p> <p>The package includes a 'concept plan' for a range of retirement units and aged care facilities in the southern portion of the site, with no residential buildings proposed to be located to the north of the stream that intersects the site.</p> <p>There is no mechanism tying this to the rezoning sought in the submission.</p>	
<p>Comment:</p>	<p>The submission package is supported by a Memorandum from Novo Group. That Memorandum restates a number of requirements of the NPS-UD but is not specific to the locality, nor provides any analysis as to capacity or demand. Critically, the Memorandum excludes consideration of Objective 6 of the NPS-UD that decisions on urban development are to be integrated with infrastructure planning and funding decisions, and decisions strategic over the medium and long term.</p> <p>The submission package also references a 'clear and acknowledged need' to recognise that senior citizens remain valuable members of their communities as they age.</p> <p>There are two matters arising as associated with that statement: Firstly, that analysis is not accompanied with any demographics or evidence, and regardless the Property Economics analysis referenced above identifies sufficient development capacity for housing opportunities (and it is understood that the TPDP provides for a range of in-community residential care such as Retirement Villages (GRZ-P3, GRZ-R11) and Supported Residential Care (GRZ-R6)); and secondly that a General Residential Zone is sought which enables but does not ensure such an outcome.</p> <p>The statement in the submission package that <i>'the Council's reliance on empirical data does not address, are the aspirations, wants and needs of the</i></p>	

	<p><i>community</i>' is not accepted. The statutory requirements as understood require considerations of factual and empirical evidence as there are associated costs and benefits relating to taking an integrated, informed and prudent approach to strategic planning.</p> <p>Contiguous: It is considered that the subject site is contiguous with the existing settlement pattern, which can (where infrastructure capacity exists and demand is present) result in efficient urban forms. In this instance, regardless of infrastructure considerations, I do not consider that there is sufficient unmet demand that would result in efficient infrastructure provision for the site.</p> <p>Constraints: There are potential issues associated with the site (as identified in the submission package) associated with flood risk. Issues associated with geotech and earthworks to facilitate realisable site development could prevent efficient residential development and have not been advanced in the submission package.</p> <p>The site is located on both LUC2 and 3 soils. Given the discussion on sufficiency and the table above, it is not considered that the site is required to provide sufficiency for the purpose of Clause 3.6(4)(a) and (b) of the NPS-HPL.</p> <p>Sufficiency: The submission would provide 10.6ha of additional GRZ land (or 6.5Ha with a split OSZ). The land is not required to provide sufficiency nor housing choice, and would simply result in inefficient infrastructure provision without assisting in achieving a consolidated and integrated settlement pattern.</p> <p>It is recommended, based on an economic consideration that the submission be rejected.</p>
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Temuka

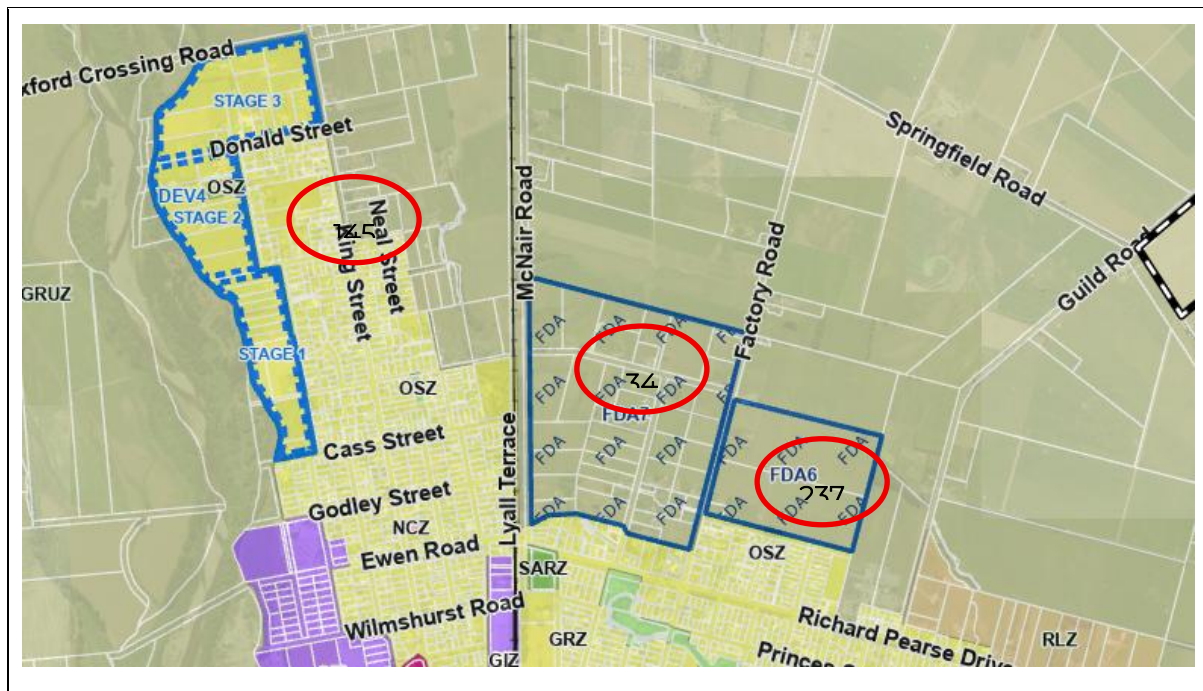
As identified in the Residential Capacity Economic Assessment (2024), under a medium growth forecast, there is sufficient realisable capacity for housing to beyond 2053 (long term).

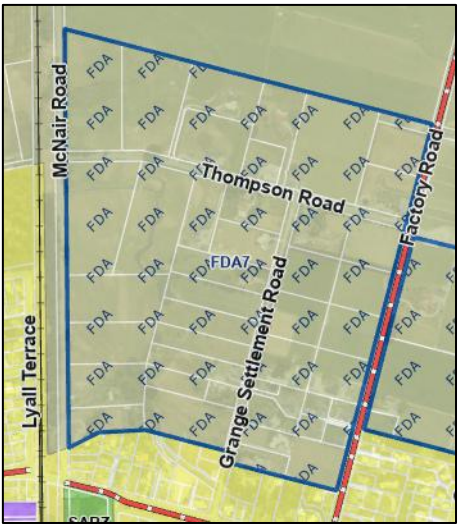
The table below shows for the High Growth forecast the demand / capacity balance for the short term, medium term and long term and identifies substantial sufficiency in capacity beyond 2033, with a shortfall of some 60 households by 2053 in the absence of any rezonings by notified FDAs. There is substantial capacity to beyond 2053 under a High Growth forecast where the notified FDAs are accounted for.

Capacity Required (High Growth)			Urban Capacity	Sufficiency without FDA			Future Development Areas (FDA)	Sufficiency with FDA (by 2053)
Short term (by 2026)	Medium term (by 2033)	Long term (by 2053)		Short term (by 2026)	Medium term (by 2033)	Long term (by 2053)		
85	238	545	481	396	243	-64	312	248


Three submission packages have been received in relation to Temuka.

Sub No.	Submitter	Address
34	Greenfield, McCutchen, Tarrant, Sullivan, Ellery	31 Factory Road, 14,25, 28 and 55 Grange Settlement Road / FDA7
145	T Johnson	340 King Street
237	Aitken, Johnston and RSM Trust	26 and 52 Factory Road / FDA6




34	McCutchen, Tarrant, Sullivan, Ellery	31 Factory Road, 14,25, 28 and 55 Grange Settlement Road / FDA7
Submission and location:	<p>Site size is 40.5ha.</p> <p>The site is zoned GRUZ, with an accompanying FDA7 overlay as identified in SCHED15 for Rural Lifestyle Zone and a Priority area – 2-year DAP.</p> <p>The submission supports notified TPDP provision associated with FDA7 and states in the submission [13]:</p> <p><i>“Support for FDA7 Thompson Road Future Development Areas and the associated 2-year priority”</i> (as identified in SCHED15).</p>	
Comment:	<p>The submission seeks to simply support the notified TPDP provisions.</p> <p>It is understood that the Council's Engineers have identified servicing restrictions for wastewater reticulation which would impose a 2 Ha density for this block. I consider that this already largely reflects the existing cadastral configuration of the block. Whilst this may have subsequent consequences for resultant density and yield, this does not result in any requirement for a more responsive approach</p>	

	<p>by the Council to alternative development opportunities for Temuka given that Temuka is not an area subject to considerable pressures for growth, and the extent of realisable capacity already available (under either a moderate or high growth scenario) to well beyond the life of this district plan (beyond 2033).</p> <p>No further analysis is required.</p>
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145	T Johnson	340 King Street
Submission and location:	<p>Site size is 0.96Ha.</p> <p>The submission seeks to rezone the property at 340 King Street Temuka. The submitter considers the property is not rural in nature, and seeks to rezone the property from General Rural Zone (GRUZ) to General Residential Zone (GRZ).</p>	
Comment:	<p>The submission package is also supported by the Benje Patterson 2022 Report, and the same concerns as noted previously apply. The report was not prepared for the purpose to which it is being applied in the submission package.</p> <p>My analysis of the submission is:</p> <p>Contiguous: It is considered that the subject site is contiguous with the existing settlement pattern, and it is understood can be efficiently integrated with supporting infrastructure. Given the modest increase in housing opportunity created, and the more intensive surrounding residential character, I consider that the relief would effectively represent infill development. The modest nature of the development yield does not move the dial in any material way (positive or adverse) in terms of the extent of exiting sufficiency present in Temuka.</p> <p>Constraints: There are no obvious constraints associated with site development, the site is flat and surrounded by existing residential type development. Additional site access is provided by Neal Steet.</p> <p>There is a small portion of Highly Productive Land in the northeastern corner of the site, but given both existing use and scale would be illogical to retain as GRUZ where the balance of the site is rezoned to GRZ.</p> <p>Sufficiency: The submission is not required for sufficiency but effectively represents infill development.</p>	

	It is recommended, based on an economic consideration that the submission be accepted.
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237	Aitken, Johnston and RSM Trust	26 and 52 Factory Road / FDA6
Submission and location:	<p>The amending proposal relates to a 17.93Ha block, which has an estimated residential yield of between 180 to 215 household allotments (10 – 12HH/Ha).</p> <p>The submission supports the intent of the Future Development Area Overlay (FDA6) across 26 and 52 Factory Road.</p> <p>The submission opposes the 'beyond ten year' time frame for the Development Area Plan, seeking to either amend SCHED15 to remove the timeframe associated with the FDA and rezone to General Residential Zone (GRZ), or amend the SCHED15 DAP timeframe to 5 years.</p> <p>The submission package also identifies a subsidiary relief, that the 'strip' to the south of the site that is not Highly Productive Land (HPL) is immediately zoned GRZ.</p>	
Comment:	<p>The submission package is supported by a Memorandum from Novo Group. That Memorandum restates a number of requirements of the NPS-UD but is not specific to the locality, nor provides any analysis as to capacity or demand. Critically, the Memorandum excludes consideration of Objective 6 of the NPS-UD that decisions on urban development are to be integrated with infrastructure planning and funding decisions, and decisions strategic over the medium and long term.</p> <p>The Residential Capacity Report (2024) identifies a potential capacity of some 238 residential allotments. This aligns with that in the submission package (240 residential sections).</p> <p>Contiguous: It is considered that the subject site is relatively contiguous with the existing settlement pattern. It is understood that there are significant infrastructure costs associated with servicing the site, I do not consider that</p>	

	<p>there is sufficient unmet demand that would result in efficient infrastructure provision in the short or medium term (that is beyond 2033).</p> <p>Constraints: It is understood that there are infrastructure servicing constraints associated with the site.</p> <p>The site is located on LUC2 soils. Given the discussion on sufficiency and the table above, it is not considered that the site is required to provide sufficiency for the purpose of Clause 3.6(4)(a) and (b) of the NPS-HPL. It is likely that the area still provides productive potential.</p> <p>Sufficiency: The submission would provide 18ha of additional GRZ land. The land is not required to provide sufficiency nor housing choice and would simply result in inefficient infrastructure provision without assisting in achieving a consolidated and integrated settlement pattern.</p> <p>In terms of that part of the relief seeking an immediate rezoning or a more responsive 5-year DAP process, it is considered that there is not an economic rationale in support of those outcomes. More responsive urbanisation would result in infrastructure inefficiencies and not assist in the consolidation of the existing urban area as sought by the objectives of the TPDP.</p> <p>That part of the relief seeking a strip of rezoned GRZ to the south of the block outside the HPL would not aid in integration or a cohesive settlement pattern, nor is required to assist with sufficiency.</p> <p>It is recommended, based on an economic consideration that the submission(s) be rejected.</p>
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Geraldine

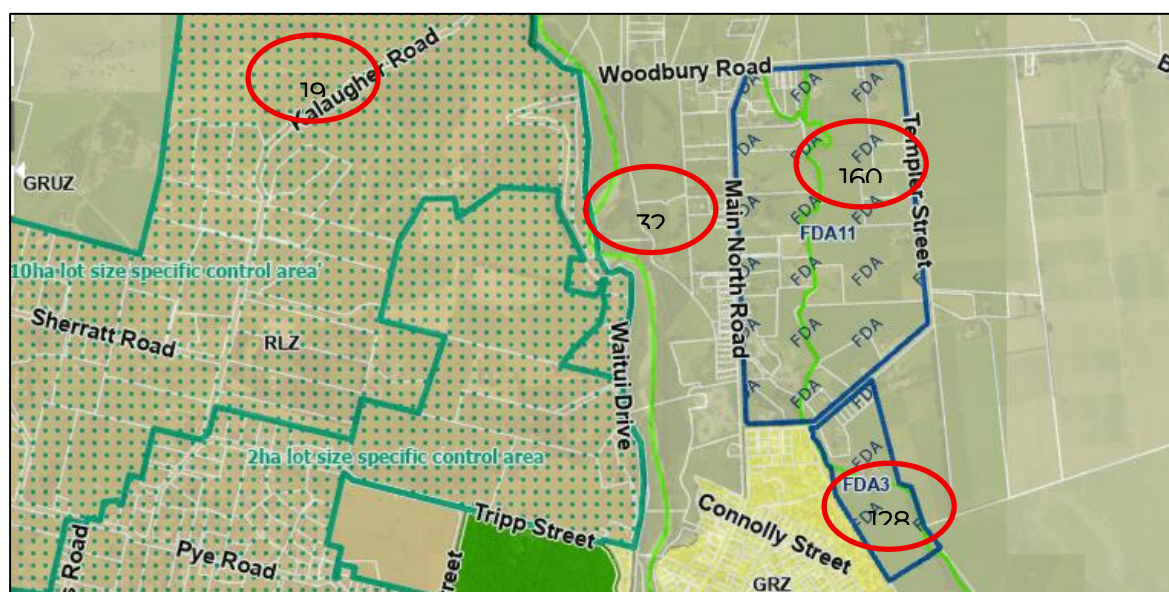
As identified in the Residential Capacity Economic Assessment (2024), under both a medium and high growth forecast, there is sufficient realisable capacity for housing to beyond 2053 (long term).

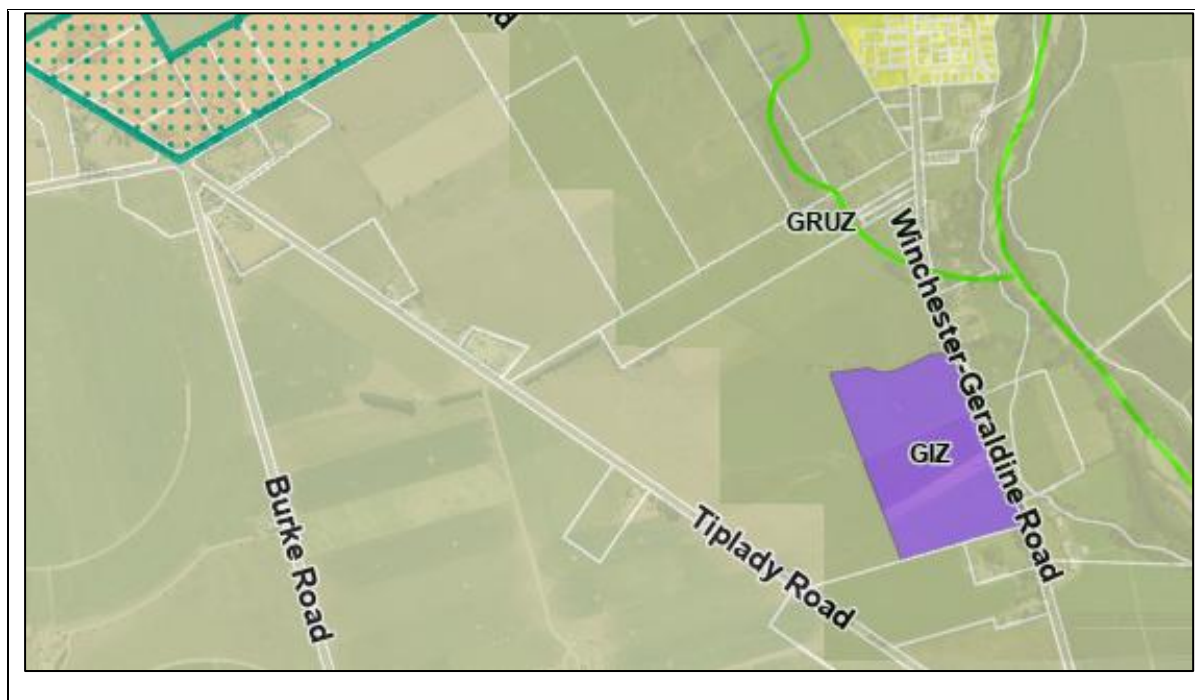
The table below shows for the High Growth forecast the demand / capacity balance for the short term, medium term and long term and identifies substantial sufficiency in capacity beyond 2053.

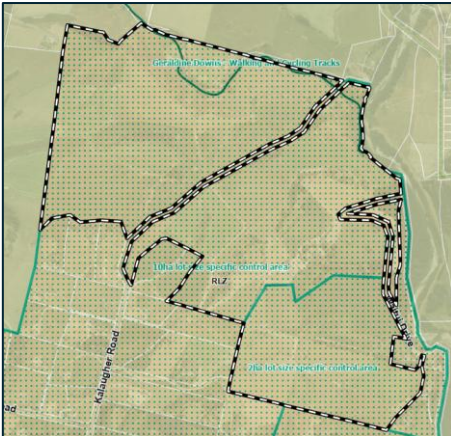
Capacity Required (High Growth)			Urban Capacity	Sufficiency without FDA			Future Development Areas (FDA)	Sufficiency with FDA (by 2053)
Short term (by 2026)	Medium term (by 2033)	Long term (by 2053)		Short term (by 2026)	Medium term (by 2033)	Long term (by 2053)		
80	223	511	593	513	370	82	428	510

Five submission packages have been received in relation to Geraldine.

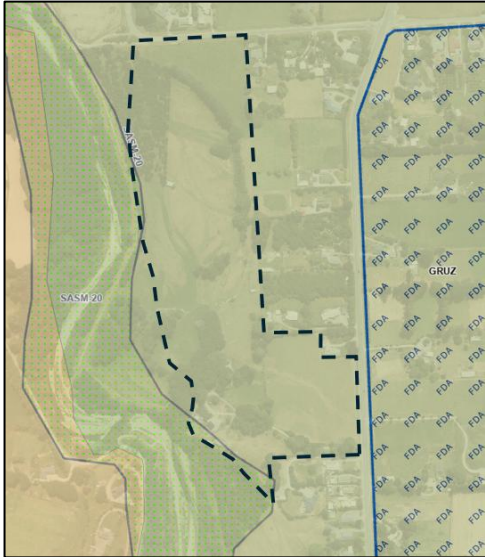
Sub No.	Submitter	Address
19	Waitui Deer Farm Ltd	199 Waitui Drive
32	Bruce Selbie	77 Main North Road
128	W & E Scott	22 Templer Street
160	D & S Payne	20 Bennett Road
241	J Livestock Ltd	841 Tiplady Road

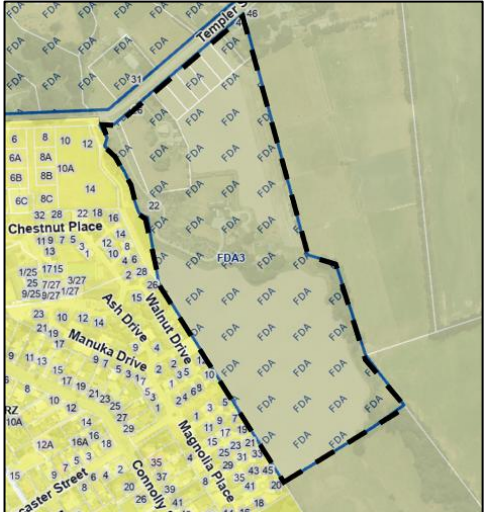




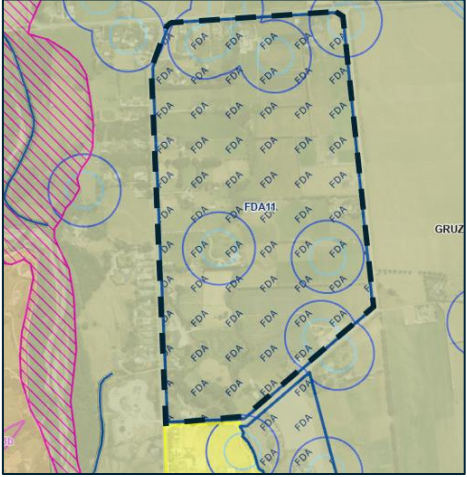
19	Waitui Deer Farm Ltd	199 Waitui Drive
Submission and location:	<p>The amending proposal relates to a 115.5ha block of land located to the north of Geraldine township and west over the Waihi River.</p> <p>The submission seeks to amend the minimum density size for Specific Control Areas in the Rural Lifestyle Zone for 199 Waitui Drive, Geraldine, as zoned RLZ and subject to two distinct density controls (10ha or 2ha) as Specific Control Areas to all be included in the 2ha Specific Control Area. That is the minimum allotment size would be 2ha – this would provide for up to 30 allotments.</p> <p>The area relates to that part of Geraldine Downs which was identified as Rural Lifestyle and Rural Residential Sub Zone(s), as zoned Rural 4A under the Operative District Plan, including minimum subdivision sizes (Rural</p>	

	Residential sub-zone 2ha; Rural Lifestyle sub-zone 10ha; and Rural Production sub-zone 40ha. These were essentially 'rolled over' into the TPDP.	
Comment:	<p>The submission package is also supported by the Benje Patterson 2022 Report, and the same concerns as noted previously apply. The report was not prepared for the purpose to which it is being applied in the submission. There is no detail provided on the economic benefits and costs associated with this proposal, which would provide for a total of 30 dwellings, but carry considerable economic costs associated with Geotech, site preparation, the provision of access and infrastructure, and associated community funding implications.</p> <p>Contiguous: The site is not contiguous with, or adjoined to the existing Geraldine settlement, and would result in inefficiencies in terms of infrastructure provision (especially if sought to be provided by community networks) and roading and vehicle access. There are other options for the provision of Rural Lifestyle that are more proximate (and hence more efficiently located) to Geraldine township.</p> <p>Constraints: The site is not identified as HPL.</p> <p>The land appears to have a rolling to steep hill that would limit residential and access opportunities and increase costs associated with earthworks.</p> <p>Sufficiency: The land is not required to provide sufficiency nor housing choice and would simply result in inefficient Rural Lifestyle provision in an inefficient manner.</p> <p>It is recommended, based on an economic consideration that the submission(s) be rejected. It is acknowledged that where landscape / ecology outcomes that as embedded in the district plan would be enhanced these may provide resource management outcomes that would support the increase in density. These would need to be carefully balanced against the economic disbenefits associated with the proposal.</p>	

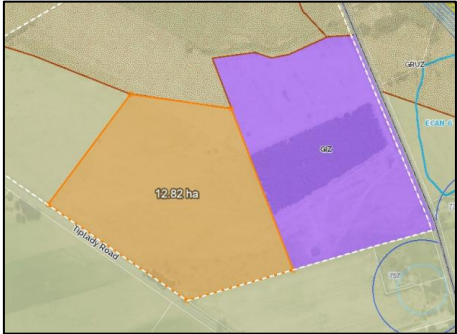
32	Bruce Selbie	77 Main North Road
Submission and location:	<p>Site size is 5.45Ha.</p> <p>The submission seeks that the site at 77 Main North Road, Geraldine be zoned Rural Lifestyle Zone (RLZ) rather than General Rural Zone (GRUZ).</p> <p>The yield at a 2ha minimum density would be one (1) additional dwelling.</p> <p>The yield at 5,000m² (as subject to the provision of reticulated wastewater) would be three (3) to four (4) additional dwellings.</p>	
Comment:	<p>The submission is supported by the Benje Patterson 2022 Report, and the same concerns as noted previously apply. The report was not prepared for the purpose to which it is being applied in the submission. The commentary above as to not advancing the localised submission or requirements under the NPS-UD and NPS-HPL are relevant.</p> <p>Contiguous: The site is not contiguous with, or adjoined to the existing Geraldine settlement, and would result in inefficiencies in terms of infrastructure provision (especially if sought to be provided by community networks). It is understood that the Council has not identified funding in the LTP for wastewater reticulation supply and regardless would represent an inefficient and ineffective provision given the discrete nature of the relief, especially in advance of FDA11.</p> <p>Constraints: The site is identified as LUC2, and hence is HPL under the NPS-HPL. There are no infrastructure servicing available to the site, and it is separated from the existing Geraldine urban area.</p> <p>Sufficiency: The land is not required to provide sufficiency nor housing choice and would simply result in inefficient Rural Lifestyle provision in an inefficient manner. The resultant rezoning as sought would likely lead to private benefits at public sector costs.</p> <p>It is recommended, based on an economic consideration that the submission(s) be rejected.</p>	

128	W & E Scott	22 Templer Street
<p>Submission and location:</p>	<p>The submission relates to some 11.4ha at the north-eastern end of Geraldine, with a potential development yield of between 110 to 130 residential allotments (at densities of circa 10 – 12 Households / Ha).</p> <p>The area subject to FDA3 is largely held in one title (22 Templer Street 'the Scott's' at 10.36ha), with two smaller titles fronting Templer Street (No. 26 at 0.813ha, and No. 44 at 0.141Ha).</p> <p>The submission supports FDA3. The submission also seeks, as an alternative, an immediate rezoning to General Residential Zone (GRZ).</p> <p>Whilst an 'indicative concept layout' is included in the submission package, there is no mechanism identified to embed this, or its outcomes, into the district plan.</p>	
<p>Comment:</p>	<p>The submission package is supported by a Memorandum from Novo Group. That Memorandum restates a number of requirements of the NPS-UD but is not specific to the locality, nor provides any analysis as to capacity or demand. Critically, the Memorandum excludes consideration of Objective 6 of the NPS-UD that decisions on urban development are to be integrated with infrastructure planning and funding decisions, and decisions strategic over the medium and long term.</p> <p>The submission package also states:</p> <p><i>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</i></p>	

	<p><i>reduction in sequencing will allow development to respond to the market.</i></p> <p>Contiguous: It is considered that the subject site is contiguous with the existing settlement pattern, which can (where infrastructure capacity exists and demand is present) result in efficient urban forms. In this instance, regardless of infrastructure considerations, I do not consider that there is sufficient unmet demand that would result in efficient infrastructure provision for the site.</p> <p>Constraints: It is understood that infrastructure capacity is not present, nor is there sufficient analysis in the submission package as to integrity of the existing network and apportioning of associated costs (to ensure equity between private benefits and community costs associated with network infrastructure provision).</p> <p>The submission package does not provide sufficient analysis and evidence to identify how infrastructure issues are to be overcome, or where there is a shortfall in capacity such that the site requires a more responsive rezoning to achieve a well-functioning urban environment.</p> <p>Sufficiency: Some 147 residential allotments is identified as associated with FDA3, and a 5-year timeframe associated with the DAP process within SCHED15. Based on a High Growth forecast there is realisable sufficiency in the absence of the Geraldine FDAs through to beyond 2053, with a more responsive timeframe of rezoning immediately would not further objectives in the plan associated with fostering consolidated and coordinated settlement patterns, nor assist in efficient infrastructure integration. The proposal would therefore lead to economic costs on the district.</p> <p>It is recommended, based on an economic consideration that the submission be rejected.</p>
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160	D & S Payne	20 Bennett Street
Submission and location:	<p>The submission package is focused on the Payne property at 22 Bennett Street (8.79ha), but relates to a broader area of 56ha, as fully contained within the road network of Main North Road / SH76, Bennett Road and Templer Street.</p> <p>The submission opposes FDA11, inclusive of its associated rule and development timeframe. The submitter considers it is unreasonable to prevent future development for a period of ten years and that the block should be rezoned as Rural Lifestyle Zone (RLZ) now.</p> <p>At a density of 2Ha / allotment as I understand would be restricted through a lack of connection to wastewater reticulation, an additional six (6) allotments could be added, as fronting Templer Street to the east, and Bennett Road to the north, as those sites fronting Main North Road would not be able to be further intensified. At a density of 5,000m² should wastewater reticulation a more substantial number of allotments would be enabled.</p>	
Comment:	<p>The site visit to this area revealed that the Rural Lifestyle Zone better reflects the situation on the ground. It is also understood that the Council's engineers have identified that wastewater reticulation will not be provided to the area, which imposes a 2Ha minimum density, which is considered to be generally consistent with the existing density on the block, and would only provide for an additional six allotments.</p> <p>Contiguous: The site is attached at its southern end with Geraldine township and is contained within a block demarcated by the roading network.</p>	

	<p>Accordingly, the site is relatively proximate to the facilities and services provided by the township (schools, town centre, community facilities). The area is developed at a density and character that largely reflects Rural Lifestyle outcomes, with the exception of some more modest areas to the east.</p> <p>Constraints: The site has an area of HPL that traverses through the centre and the western extent of the block. That area however is largely fragmented into smaller rural lifestyle holdings of circa 1.6Ha, and any productive potential diminished accordingly.</p> <p>The absence of servicing infrastructure prevents a higher density of Rural Lifestyle opportunities, and provided that this was embedded in the plan with a degree of confidence would not lead to anticipation for network servicing and associated public costs to provide infrastructure for private benefits.</p> <p>Sufficiency: The land is not required to provide sufficiency nor housing choice, but with an imposed density of 2ha / allotment and additional yield of up to six allotments would not 'move the dial' in terms of sufficiency provided expectations and commitments associated with network infrastructure are avoided – as otherwise would represent inefficient poor integration with network infrastructure.</p> <p>Based on a pragmatic response, and that at a density of 2Ha / allotment, the area would only yield effectively infill development with no additional public consequences or investment for network infrastructure, then the submission is recommended to be accepted considering only economic matters.</p> <p>Where submitters are seeking the provision of public network infrastructure and thereby increased densities for Rural Lifestyle allotments for private benefits I would recommend rejection of the submission for immediate rezoning.</p> <p>That recommendation is predicated on the basis that the economic costs of redevelopment remain uncertain and are not provided in the submission package. I would consider these costs (and benefits) should therefore remain subject to the DAP process and analysis of the costs for network infrastructure. Ultimately the rezoning (and density) would be considered through a separate Plan Change process. However, I do not consider that the DAP process would need to be constrained to a 10+ year as identified in SCHED15.</p>
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241	J Livestock Ltd	841 Tiplady Road
Submission and location:	<p>The submitter seeks to add a Future Development Area (FDA) overlay over 12.82ha of land between the notified GIZ to the south of Geraldine fronting Winchester-Geraldine Road to connect to Tiplady Road.</p> <p>The anticipated zoning sought is General Industrial Zone (GIZ). The DAP timeframe sought is 10+ Years.</p> <p>The property at 841 Tiplady Road, as bounded by Tiplady Road to the southwest, and the notified General Industrial Zone which relates to that part of the legal title fronting Winchester Geraldine Road.</p>	
Comment:	<p>The submitter package is supported by analysis prepared by the Timaru District Council for considering wider industrial land supply in Geraldine (2013) and including an Infrastructure Investigation Report (2020).</p> <p>Contiguous: The site is not contiguous with the existing urban boundary of Geraldine but would be adjacent with the notified GIZ zone. Whilst there may be efficiencies associated with right sizing servicing infrastructure networks, this is highly dependent on whether ongoing and consistent demand was present.</p> <p>Constraints: The site is not HPL.</p> <p>There are existing infrastructure constraints to servicing the existing GIZ area adjoining the submission area.</p> <p>Sufficiency: The land is not required to provide sufficiency. It is not considered that there is sufficient and consistent growth in Industrial demand to warrant the inclusion of an FDA with DAP process of 10+ years for that area subject to the submission. The notified zoning area (in addition with existing capacity) is considered to provide substantial capacity to meet localised demand, with any additional infrastructure sizing / capacity being unnecessary.</p> <p>There is no supporting information in the submission package providing a rational demand based foundation for additional rezoning / FDA overlay.</p> <p>It is recommended that the submission be rejected.</p>	

Timaru – Overall Dwelling Capacity overview

As identified in the Residential Capacity Economic Assessment (2024), under a medium growth forecast, there is sufficient realisable capacity for housing to beyond 2053 (long term).

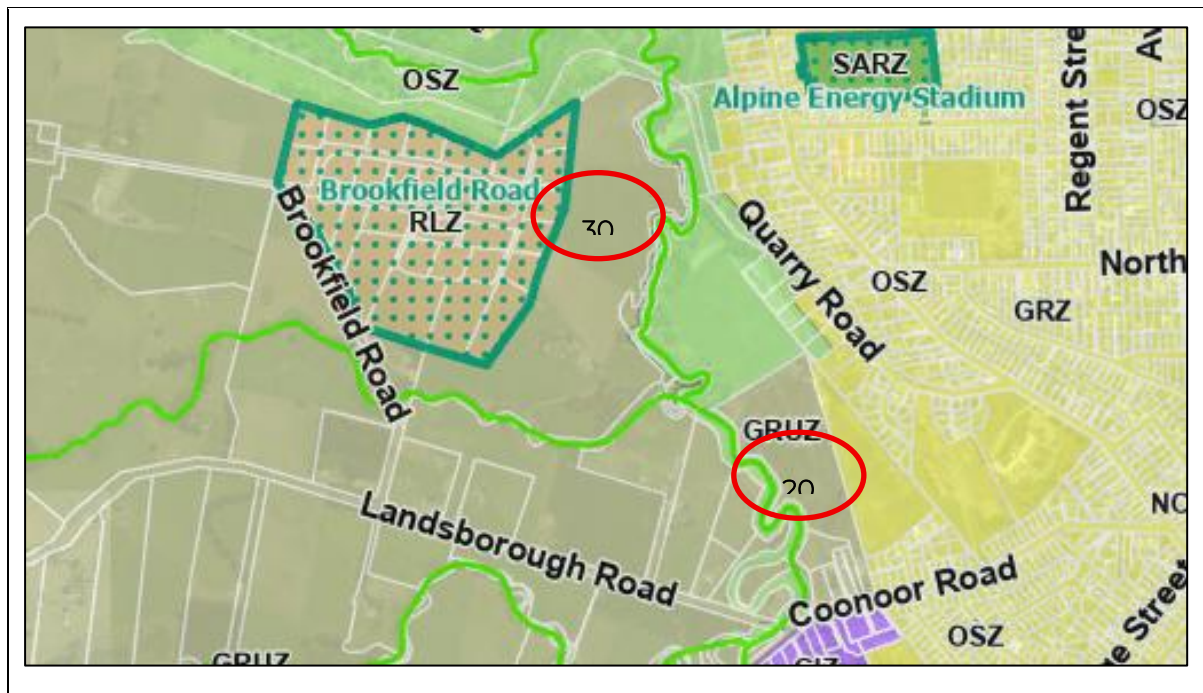
The table below shows for the High Growth forecast the demand / capacity balance for the short term, medium term and long term and identifies substantial sufficiency in capacity beyond 2033, with a shortfall of some 465 households by 2053 in the absence of any rezonings by notified FDAs. There is substantial capacity to beyond 2053 under a High Growth forecast where the notified FDAs are accounted for.

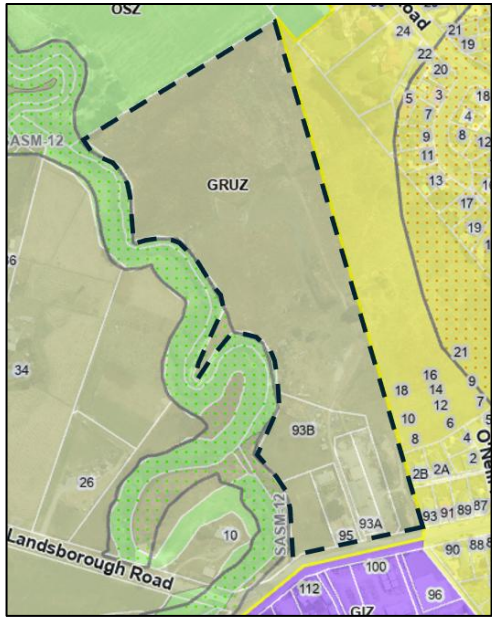
Capacity Required (High Growth)			Urban Capacity	Sufficiency without FDA			Future Development Areas (FDA)	Sufficiency with FDA (by 2053)
Short term (by 2026)	Medium term (by 2033)	Long term (by 2053)		Short term (by 2026)	Medium term (by 2033)	Long term (by 2053)		
474	1,328	3,047	2,582	2,108	1,254	-465	2,637	2,172

Timaru South


Two submission packages have been received in relation to that area south of Timaru settlement.

Sub No.	Submitter	Address
20	T & A O'Neill	93A Coonoor Road, Timaru
30	C & S McKnight	60 Landsborough Road, Timaru



20	T & A O'Neill	93A Coonoor Road
Submission and location:	<p>The submitter seeks rezoning from General Rural Zone (GRUZ) to General Residential Zone (GRZ).</p> <p>The amending proposal has a spatial area of 6.7ha, and at a density of between 10 – 12 HH/Ha would provide for an additional 65 – 80 households, depending on the extent of on-site stormwater management and the provision of additional esplanade reserve.</p> <p>The amending proposal adjoins the Ōtipua Creek to the west with the 'urban area' boundary to the east.</p>	
Comment:	<p>The submission package is also supported by the Benje Patterson 2022 Report, and the same concerns as noted previously apply.</p> <p>My analysis of the submission is:</p>	

	<p>Contiguous: It is considered that the subject site is contiguous with the existing settlement pattern, and effectively provides a '<i>plug in</i>' to existing urban form and adjoining sports fields. The site is considered to be more efficiently located than a number of notified FDA options, although may give rise to constraints of a nature that are not considered in this economic assessment.</p> <p>Constraints: There are no obvious constraints associated with site development, the site is relatively flat and surrounded by existing residential type development. There may be issues associated with flooding and associated geotechnical / groundworks to ensure appropriate flood hazard management.</p> <p>The site is not HPL.</p> <p>It is understood that there are constraints in terms of providing network infrastructure as the area is not included in the Council's LTP programme. This would need to be overcome such that private benefits are not placed onto the wider community, as this area is not required to overcome a dwelling sufficiency imbalance.</p> <p>Sufficiency: The submission is not required for sufficiency but provides a practical urban extension and outcome that provides housing choice (typology and location) likely at the lower end of the market – as dependent on flood management and network infrastructure provision.</p> <p>It is recommended that should the submitter be able to demonstrate how network infrastructure and flood management can be overcome (and subject to non-economic values), then there are economic benefits associated with the rezoning, and the submission should be accepted.</p>
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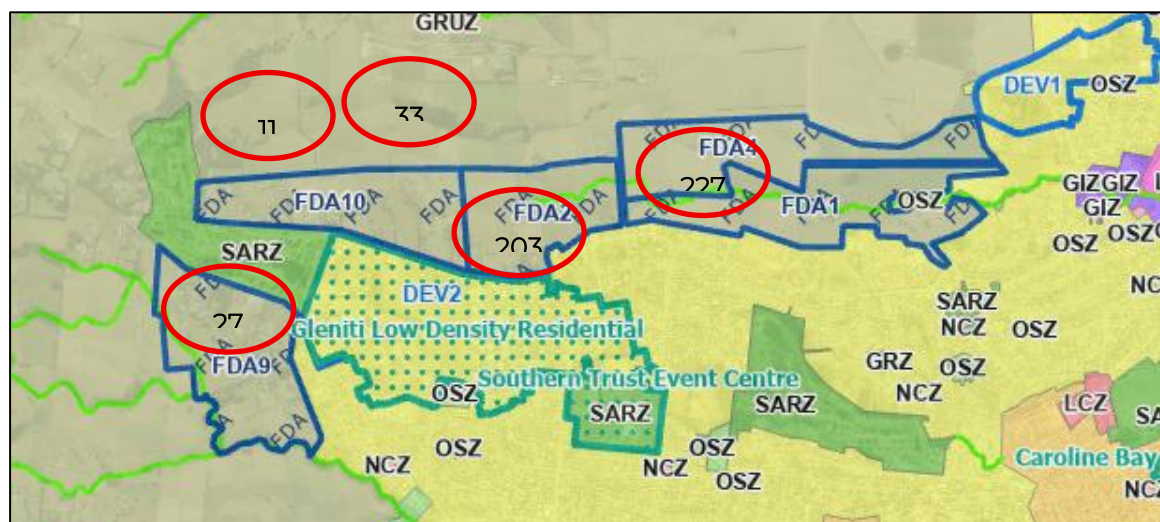
30	C & S McKnight	60 Landsborough Road, Timaru
Submission and location:	<p>The submitter seeks to extend the notified Specific Control Area overlay (Brookfield Road) and Rural Lifestyle Zone over additional areas legally described as Lots 5 and 6 DP502319 which has a combined land area of 26.7ha.</p> <p>The submission package appears to narrow that relief to a Rural Lifestyle Zone (RLZ) extension of some 1.25Ha (to provide for five additional allotments) and an Open Space Zone (OSZ) (for land to be offered to the Timaru District Council) of some 7.6Ha fronting Ōtipua Creek. This should be clarified by the submitter.</p> <p>The submission package identifies it is <i>'primarily seeking to achieve five additional Rural Lifestyle allotments adjacent to the area known as Brookfield Height subdivision. This would give effect to the final five allotments provided for in the Brookfields Heights Rural Lifestyle Zone in the Operative District Plan'</i></p>	
Comment:	<p>The submission package is also supported by the Benje Patterson 2022 Report, and the same concerns as noted previously apply.</p> <p>My analysis of the submission is:</p> <p>Contiguous: The additional allotments, whilst modest in number are not adjoined to the existing Timaru settlement but would be considered part of the Bluerise Rural Lifestyle development. The additional allotments would not contribute to a coordinated settlement pattern.</p> <p>Constraints: The site is identified as HPL.</p> <p>It is understood that there may be sufficient capacity in the existing infrastructure networks to support the additional five allotments. It is also understood that Council's Reserves unit has recommended that it will not</p>	


	<p>accept a 7.65Ha area as Open Space Zone as part of the submission given its constraints and ongoing maintenance costs and has indicated it is selling land given the Council's current financial position.</p> <p>Sufficiency: The submission is not required for sufficiency, and is not supported by any economic analysis justifying the outcomes.</p> <p>It is recommended, based on an economic consideration that the submission be rejected.</p>
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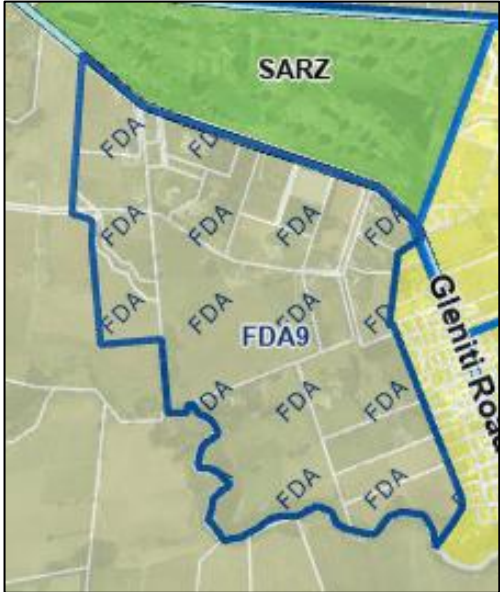
Timaru North – Pages Road and Gleniti Road

Five submission packages have been received in relation to that area south of Timaru settlement.

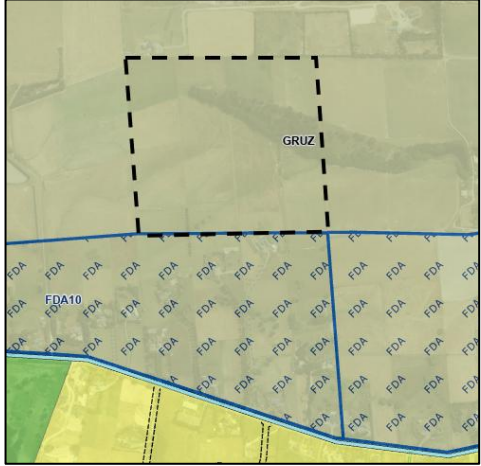
Sub No.	Submitter	Address
11	Gerald Morton	509 and 427 Pages Road, Timaru
27	Rabbidge, Singline and RSM Trust	210 Gleniti Road, Timaru
33	Pyke, Ford, Andrews, Talbot, Wilkins, Proudfoot, Craig and Mackenzie	333, 355, 365 375, 385, 397 and 403 Pages Road, Timaru
203	Pages Trust and Russell Trust	251, 273, 279 and 295 Pages Road, Timaru
227	Rose Westgarth and Jan Gibson	82 Kellands Hill Road, Timaru



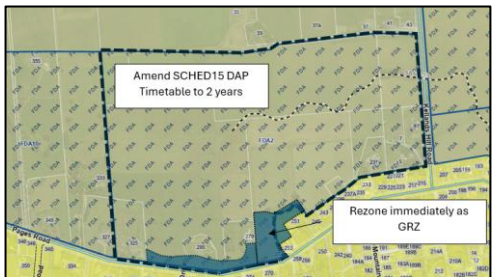
11	Gerald Morton	509 and 427 Pages Road, Timaru
Submission and location:	<p>The submission seeks to amend FDA10 should be extended to include 509 and 427 Pages Road, Gleniti.</p> <p>The associated area is 49.0 Hectares and consists of three moderate scale rural blocks of 17.2Ha, 22.0Ha and 10 Ha respectively.</p> <p>FDA10 is anticipated for Rural Lifestyle Zone with a DAP process as 'Priority Area – 5 Years'.</p> <p>At a density of 2Ha/allotment (in the absence of wastewater reticulation) an addition 20 allotment would be anticipated.</p>	
Comment:	<p>The submission package contains the Benje Patterson 2022 report and the same concerns as noted previously apply.</p> <p>Contiguous: The subject area adjoins the notified FDA10, and would result in additional low density rural lifestyle relatively proximate to the Timaru urban area. There is no suggestion or analysis associated with the provision of wastewater reticulation and thereby providing a more intensive form of Rural Lifestyle development, thereby resulting in an inefficient development of the productive rural resource.</p> <p>Constraints: The area is HPL. It is understood that there are no network services proximate to the area, nor any anticipated funding in the LTP to provide network services.</p> <p>Sufficiency: The submission is not required for sufficiency or choice within the life of the district plan, nor to provide choice in the long term (that is beyond 2053).</p> <p>The rezoning (or extending the FDA10 overlay to include the area) relates to an extensive area of HPL, and there are economic costs associated with foreclosing that productive potential where there are sufficient alternatives to accommodate both residential capacity requirements, and 'limited' opportunities to provide for Rural Lifestyle choice.</p> <p>It is recommended, based on an economic consideration that the submission be rejected.</p>	

27	Rabbidge, Singline and RSM Trust	210 Gleniti Road, Timaru
Submission and location:	<p>The submission seeks that the DAP timeframe for FDA9 be shortened from 5 years to 2 years.</p> <p>FDA9 anticipates a Rural Lifestyle Zone with a DAP formation process of 5 years (SCHED15)</p> <p>The submission (and FDA9) relates to a 51ha land area that borders the Gleniti Golf Course and Gleniti Road to the north, and the southern boundary follows Ōtipua Creek; the eastern boundary adjoins the General Residential Zone (GRZ) to the east, and a larger 10ha rural landholding (Sub 217.1) adjoins FDA9 to the east.</p> <p>At a density as serviced by wastewater reticulation, a potential capacity of 87 dwellings would be provided</p>	
Comment:	<p>The submission package contains the Benje Patterson 2022 report and the same concerns as noted previously apply.</p> <p>Contiguous: The subject area relates to the notified FDA9, and is considered to provide a rural lifestyle residential choice relatively proximate to the Timaru settlement, where that area fronting Pages Road exhibits a low-density rural lifestyle character.</p> <p>Constraints: It is understood that there are no network services immediately proximate to the area, nor any anticipated funding in the LTP to provide network services. A more responsive DAP process (and associated plan change) would result in economic costs where this displaces infrastructure funding as associated with existing and anticipated funding programmes.</p> <p>These matters require resolution through the DAP process.</p> <p>Sufficiency: The submission is not required for sufficiency or choice within the life of the district plan.</p>	

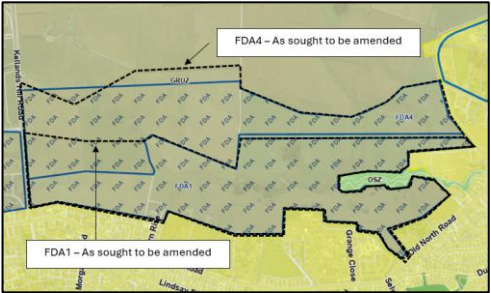
	<p>It is considered that there are no wider community benefits associated with a more responsive DAP process as requested in the submission. A more responsive DAP process (and Plan Change) is likely to result in economic costs (to the public) associated with the transfer of infrastructure funding to provide dwelling sufficiency and housing choice that is not required within the short or even medium term.</p> <p>It is recommended, based on an economic consideration that the submission be rejected.</p>
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33	Pyke, Ford, Andrews, Talbot, Wilkins, Proudfoot, Craig and Mackenzie	333, 355, 365 375, 385, 397 and 403 Pages Road, Timaru
Submission and location:	<p>The submitter seeks to extend the boundaries of FDA10 to include all of the land at 333, 335, 365, 385, 397 and 403 Pages Road, and the DAP preparation process in SCHED15 be amended to 2 years (rather than 5 years).</p> <p>FDA10 anticipates a Rural Lifestyle Zone.</p> <p>The area associated with the requested extension is 21ha. An anticipated yield, in the absence of wastewater reticulation would be in the order of 10 two-hectare allotments, and 20 where reticulation was to be provided.</p>	
Comment:	<p>The following assessment is consistent to that associated with Sub. 11 Morton.</p> <p>The submission package contains the Benje Patterson 2022 report and the same concerns as noted previously apply.</p> <p>Contiguous: The subject area adjoins the notified FDA10, and would result in additional low density rural lifestyle relatively proximate to the Timaru urban area. There is no suggestion or analysis associated with the provision of wastewater reticulation and thereby providing a more intensive form of Rural Lifestyle development, thereby resulting in an inefficient development of the productive rural resource.</p> <p>Constraints: The area is HPL. It is understood that there are no network services proximate to the area, nor any anticipated funding in the LTP to provide network services.</p> <p>Sufficiency: The submission is not required for sufficiency or choice within the life of the district plan, nor to provide choice in the long term (that is beyond 2053).</p> <p>The rezoning (or extending the FDA10 overlay to include the area) relates to an extensive area of HPL, and there are economic costs associated with foreclosing that productive potential where there are sufficient alternatives to</p>	

	<p>accommodate both residential capacity requirements, and 'limited' opportunities to provide for Rural Lifestyle choice.</p> <p>It is recommended, based on an economic consideration that the submission be rejected.</p>
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203	Pages Trust and Russell Trust	FDA2 and 251, 273, 279 and 295 Pages Road, Timaru
Submission and location:	<p>The submission seeks:</p> <ul style="list-style-type: none"> • A reduction in the DAP preparation process for FDA2 to 2 years (from 5); and that • The front portion of Pages Road (251, 273, 279 and 295 Pages Road) be rezoned immediately to General Residential Zone. 	
Comment:	<p>No technical economic evidence is provided by within the submission package. However, the submission package states in critique to the Property Economics Residential Report (2024):</p> <p><i>However, publicly available information indicates the population of the Timaru District in 2024 had already reached 50,100. The Property Economics analysis is also out of step with analysis commissioned by Venture Timaru from Benje Patterson of People & Places, which indicates that Timaru District could require up to 9,000 more households by 2050.</i></p> <p>To put this in context, the authors of the submission package are suggesting that Timaru District will need to supply a land area of a sufficiency to accommodate the approximate existing dwelling count of either Masterton or Taupo urban areas within the next 30 years. Given that Timaru district has taken 150+ years to reach the scale it has, and with the subdued economic forecasts (even the high growth scenario as used in the Property Economics analysis), in my view that proposition is not a realistic basis for considering the submission request.</p> <p>My analysis of the submission package is as follows:</p> <p>Contiguous: The subject area is relatively proximate to the Timaru urban area, and hence logical in terms the application of an overlay anticipating additional residential development as needed. The subject area represents an efficient location to provide for additional housing demand.</p> <p>Constraints: It is understood that that area subject to specific immediate rezoning fronting Pages Road can be met with existing servicing capacity, whereas at a macro level the Council Engineers have identified a need to plan for servicing across the wider FDA2 area in an integrated and comprehensive</p>	

	<p>manner, and that no funding exists in the LTP for providing network infrastructure to the block.</p> <p>Sufficiency: The submission is not required for sufficiency or choice, and if released early would provide unnecessary supply to the market at significant cost to ratepayers / community due to infrastructure requirements (and transfer of infrastructure funding from existing allocated projects).</p> <p>In terms of the localised rezoning along Pages Road, the extent would not move the dial in terms of sufficiency, but would have substantial economic costs if the rezoning foreclosed more integrated development (through an ODP / Structure Plan) with the remainder of the block. Where the submitter can demonstrate (and embed a mechanism in the district plan) that such a rezoning would not foreclose integrated connections with the wider FDA2 DAP process, this would result in certainty (and economic benefits) to these landowners.</p> <p>Overall, a more responsive outcome for FDA2 is recommended to be rejected.</p> <p>The more specific rezoning along Pages Road is also recommended to be rejected on the basis as proposed in the submission package. The site specific rezoning could provide net economic benefits where it is demonstrated through evidence that: network infrastructure is provided without wider community costs; and appropriate connections to not foreclose integrated development on the balance of FDA2 where embedded in the district plan.</p>
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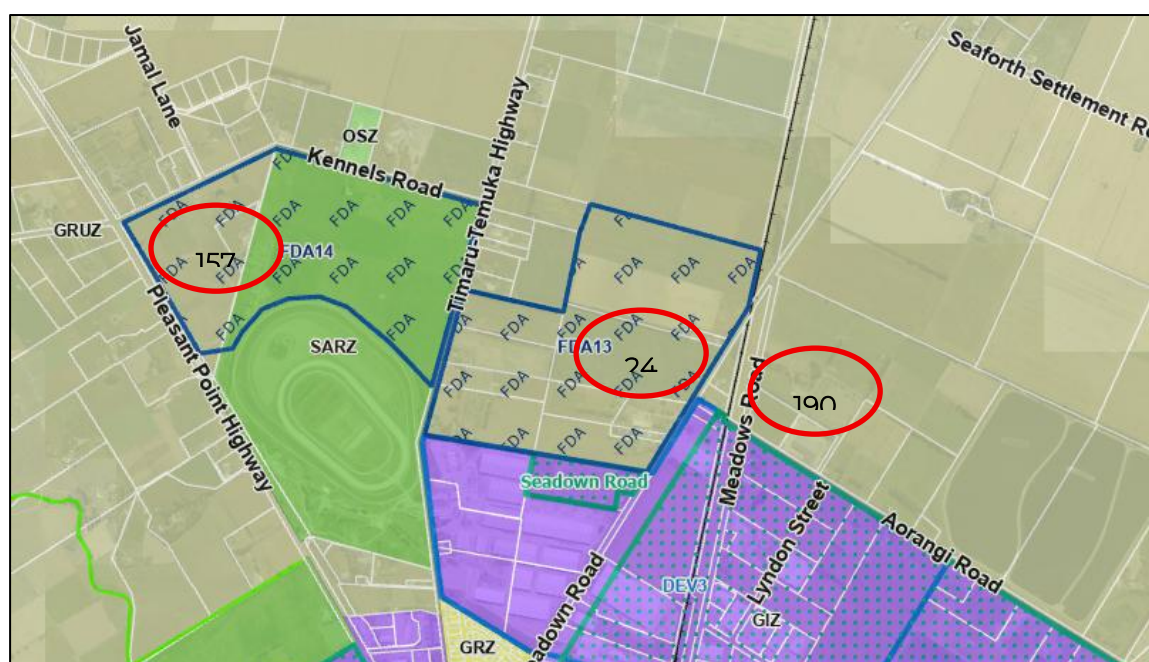
227	Rose Westgarth and Jan Gibson	82 Kellands Hill Road, Timaru
Submission and location:	<p>The submitter supports enabling the southern part of 82 Kellands Hill Road for urban development but is concerned that the proposed Urban Development Area (FDA1) does not accurately reflect the sites contours and physical features.</p> <p>The submitter would prefer an approach to rezone FDA1 to General Residential (GRZ) immediately removing the FDA overlay.</p> <p>The submission in full states:</p> <ol style="list-style-type: none"> <i>Rezone areas identified as FDA1 as identified in the location map in the original submission from GRUZ to GRZ and remove the FDA1 overlay.</i> <i>Undertake any consequential amendment to give effect to the rezoning and pathway for Development Area Plan preparation.</i> <i>If the rezone is not accepted, then amend the FDA boundary lines between FDA1 and FDA4, and the northern boundary of FDA4 as shown in the plan provided in the submission.</i> 	<p>The plan below shows the notified TPDP and the alignment relief as requested.</p> 
Comment:	<p>The submission package is accompanied by a Memo from Novo Group, which as discussed earlier does not advance the site specific considerations associated with the submission. Importantly, the Novo Group assessment provides no assessment on existing capacity, forecast demand, and implications in terms of Objective 6 relating to infrastructure integration and strategic funding decisions.</p> <p>An analysis of the submission is as follows:</p>	

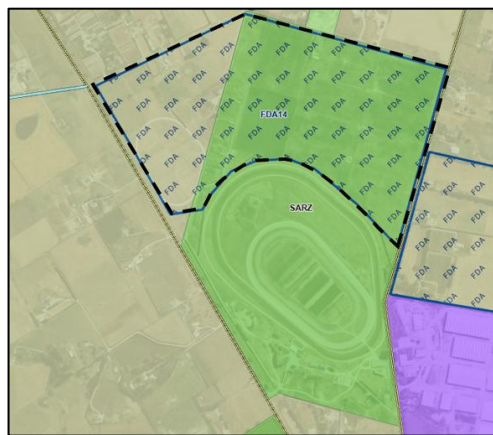
	<p>Contiguous: The subject area associated with FDA1 is relatively proximate to the Timaru urban area, and hence logical in terms the application of an overlay anticipating additional residential development as needed. FDA1 represents an efficient location to provide for additional housing demand.</p> <p>FDA4 is considered necessary, only in so far as it provides for long term sufficient provision for dwelling demand in conjunction with an integrated development of FDA1; that is connections to FDA4 to the Timaru urban area are established through the FDA1 DAP process. It is understood that the Council has prepared a draft DAP for FDA1, FDA4 (and FDA2) that seeks to embed a comprehensive and connected structure plan that seeks to ensure such a contiguous and connected development.</p> <p>Constraints: It is understood that funding associated with network servicing for FDA4 are not included in the LTP, nor is funding associated with an immediate rezoning of FDA1. Accordingly, a more responsive rezoning would result in economic costs to the public associated with funding network infrastructure, and only provide for private benefits.</p> <p>Sufficiency: The submission is not required for sufficiency or choice, and if released early would provide unnecessary supply to the market at significant cost to ratepayers / community due to infrastructure requirements (and transfer of infrastructure funding from existing allocated projects).</p> <p>On economic grounds, it is recommended that an immediate rezoning for FDA1 and a more responsive DAP process for FDA4 be rejected. Acknowledging that SCHED15 does not preclude an earlier DAP process, and that a draft DAP for FDA1, FDA2 and FDA4 has commenced.</p> <p>It is not considered that there are sufficient economic costs or benefits associated with the realignment of the boundary between FDA1 and FDA4 to warrant a recommendation. There may be other material reasons or values outside economics for demarcating the boundary.</p>
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Washdyke, North


Five submission packages have been received in relation to that area south of Timaru settlement.

Sub No.	Submitter	Address
157	Ryan De Joux	105 Kennels Road, Washdyke
190	North Meadows and Thomson Engineer	236 Meadows Road, Washdyke
248	White Water Properties Ltd	FDA13



157	Ryan De Joux	105 Kennels Road, Washdyke
Submission and location:	<p>The submitter seeks that the FDA14 timeframe identified in SCHED15 be amended from 10 years to 5 – 10 years.</p> <p>FDA14 is identified in SCHED15 for 'urban' with a DAP preparation process of 10+ years.</p> <p>The subject area is a total of 53Ha held in three titles, with the largest being under the control of the</p>	

	<p>trustees of Timaru Racecourse (at some 31ha, 330 Hilton Highway).</p> <p>The submission package is focused on 105 Kennels Road (that land owned by TDP at 17 Ha) and a yield of 150 lots at medium density is proposed.</p>	
Comment:	<p>There is no economic expert analysis associated with the submitter package. Whilst the comment below is noted, I do not consider the submitter package to provide sufficient supporting evidence:</p> <p><i>The Property Economics analysis simply does not reflect our experience on the ground in the district. We see continued strong demand.</i></p> <p>The submission package is predicated solely on the establishment of 150 dwellings, which is understood to represent only a third of FDA14. The establishment of disjointed development does not provide for cohesive or integrated infrastructure investment. The submission package also identifies that the outcome for any subsequent rezoning would be the provision of 'affordable homes'; the submission package is silent as to how such an outcome would be embedded in the district plan.</p> <p>I am aware that both the Canterbury Regional Council [183.166] and NZTA [143.198] have submissions opposing FDA14.</p> <p>My analysis of the submission package is as follows:</p> <p>Contiguous: The subject area is neither adjoining nor immediately proximate to the Timaru urban area, and will likely result in disproportionate infrastructure costs to provide for network services to facilitate residential development and overall yield. Whilst the submission seeks a more responsive DAP process, it is likely that any resulting rezoning would not represent an efficiently integrated urban rezoning, nor result in coordinated development patterns. The site is inefficiently located relative to other capacity and growth area opportunities.</p> <p>Constraints: It is understood that Council Engineers have identified that there is no provision for servicing costs identified in the LTP, and that the network servicing requirements would be substantial.</p> <p>Sufficiency: The submission is not required for sufficiency or choice and there are more appropriate alternatives provided in the existing urban area and adjacent to Timaru. A more responsive rezoning (as contained within SCHED15 or alternatively sought through application of Policy FDA-P5) would inject unnecessary supply to the market at significant cost to ratepayers / community</p>	

	<p>due to infrastructure requirements (and transfer of infrastructure funding from existing allocated projects).</p> <p>The site is inefficiently located relative to capacity and growth area opportunities, and the residential zoning referenced in the submission package appears to be for GRZ and not an 'affordable homes' zone.</p> <p>The proposal (and indeed the overlay) creates significant tension with the NPS-UD in terms of promoting a well-functioning urban environment. Accordingly, the submission seeking a more responsive DAP process is recommended to be rejected, and the submissions from NZTA and CRC seeking removal of FDA14 altogether as an overlay in the district plan are recommended to be accepted.</p>	
190	North Meadows and Thomson Engineer	236 Meadows Road, Washdyke
Submission and location:	<p>The submitter seeks that 236 Meadows Road as General Industrial, but extends the scope of the submission to:</p> <p><i>'adjoining properties that lie or are located between the site and Aorangi Road for consideration of rezoning to General Industrial Zone (GIZ)... and ... extend the GIZ to also cover the treatment ponds on the north side of Aorangi Road along with the Council land mentioned above to line up with the alignment of northern boundary of 236 Meadows Road, thus creating one contiguous zone'.</i></p> <p>The amending proposal therefore relates to an area of some 86ha.</p> <p>However, I understand from Mr Bonis (TDC s42A Reporting Officer) that the focus of this assessment should be on that area outside the WWTP Designation, being an area of 34Ha.</p>	

Comment:

No economic assessment has been provided for support for a substantial General Industrial Zone. The Memo from Novo group as attached to the submission package does not advance this matter.

At the outset, the established (and consented) industrial developments and associated servicing infrastructure are considered to represent 'sunk costs'. That is, they represent the existing environment in terms of the allocation of infrastructure funding and distribution of employment in the industrial market.

However, care should be applied as these industrial developments do not necessarily represent a net growth in employment count, and likely represent a relocation within the existing medium and high growth forecasts as set out in the Industrial Capacity Economic Report (2025). Representatives for North Meadows have confirmed that the development associated with 236 North Meadows is associated with the aggregation of three established premises in the existing Timaru Industrial zone.


I understand from the s42A Reporting Officer, Mr Bonis that a number of consents have been issued in relation to the site. Mr Bonis has provided the below diagram to assist in this assessment as to consented activities on the site.



My analysis of the submission package is as follows:

Contiguous: The subject area adjoins the northern extent of the Washdyke Industrial area, although it is understood that servicing is predicated on the

	<p>narrow demands of the existing consented developments rather than servicing the wider block.</p> <p>Constraints: The area is HPL, in terms of that area already developed or consented, the productive potential of the soils resource is already removed.</p> <p>Servicing is limited to meeting the requirements of consented and built development. There is no funding in the LTP for servicing the wider block. Overall community funding associated with industrial demand and growth and allocation would need to be resolved before rezoning and this is not provided for in the existing anticipated allocation of Council spending.</p> <p>Sufficiency: The full extent of the submission area is not required for sufficiency or choice, and if released early would inject unnecessary supply to the market with associated community infrastructure costs. That area consented / built (Yellow area above) is appropriately rezoned as GIZ given existing capital investment and need for certainty. The remaining area (in Red) is of a size that retains some productive potential, but is unlikely to be used for capital intensive activities in the interim so not foregoing industrial development in the future if required.</p> <p>It is recommended that only that area that contains existing Industrial activities, or is consented (and in the process of being established) is rezoned as GIZ.</p>
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248	White Water Properties Ltd	FDA13
Submission and location:	<p>The submission from White Water Properties [248] seeks that all land within FDA13 should be rezoned GIZ as the submitter considers the land is ideally situated for industrial development.</p> <ol style="list-style-type: none"> 1. <i>Rezone all of the land in FDA13 to General Industrial, and</i> 2. <i>Make any necessary amendments to support the rezoning</i> <p>Ryan De Joux [157] seeks that the FDA13 timeframe identified in SCHED15 be amended from 10 years to 5 – 10 years.</p> <p>The site is 61Ha and is notated as FDA13 with an anticipated General</p>	

	Industrial Zone and DAP preparation process of 10+ years in SCHED15.	
Comment:	<p>I am aware that CRC have submitted [183.66] to amend the Future Development Areas to only identify land as a future development area where it is required in the short to medium term as defined in the NPD-UD.</p> <p>There is no economic analysis supporting the submission package. It is also considered that the advocated outcome of 'bulk storage' is misleading. A GIZ is being sought which would not be limited to such a specific outcome.</p> <p>Contiguous: The subject area is not immediately proximate to the Timaru urban area, but adjoins the northern extent of the Washdyke Industrial area. Any subsequent rezoning will likely result in disproportionate infrastructure costs to provide for network services to facilitate industrial development.</p> <p>The rezoning in seeking an immediate rezoning would not represent an efficiently integrated urban rezoning, nor result in coordinated development patterns. The site is inefficiently located given existing sufficiency and infrastructure provision.</p> <p>Constraints: It is understood that Council Engineers have identified that there is no provision for servicing costs identified in the LTP, and that the network servicing requirements would be substantial.</p> <p>Sufficiency: The Property Economics District Industrial Capacity Report (2025) identifies sufficient industrial capacity over short to medium term – not until end of long-term period (20+ years) potential capacity issue.</p> <p>It is recommended that the submission(s) seeking immediate rezoning or a more responsive DAP process are rejected. This is on the basis of existing land sufficiency to cater for demand, and the associated disproportionate infrastructure costs associated with servicing this area to provide for industrial activities and associated employment.</p> <p>In terms of the submissions from CRC and NZTA, these are finely balanced. Whilst the site creates tension with the NPS-UD in terms of promoting a well-functioning urban environment in terms of current demand and sufficiency, retaining the site in SCHED15 provides a release valve as subject to monitoring should additional capacity be necessary, noting based on the PE analysis that this would be well beyond the life of this district plan.</p> <p>It is recommended that the submissions seeking removal of the area from the DAP SCHED15 are rejected.</p>	