

BEFORE THE

TIMARU DISTRICT COUNCIL HEARING
COMMITTEE

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

of the Proposed Timaru District Plan

STATEMENT OF EVIDENCE BY KEVIN THOMAS KEMP

Introduction

- 1 My name is Kevin Kemp. I hold qualifications of a Masters of Applied Geography in Resource and Environmental Studies from Texas State University – San Marcos and am currently studying towards a New Zealand Diploma in Civil Engineering from the New Zealand Institute of Highway Technology.
- 2 I am currently the Stormwater Team Leader at Timaru District Council (TDC). Prior to my current role I have held the roles of Infrastructure Planner and Subdivision and Compliance Officer at TDC. I have provided technical assistance on behalf of the Infrastructure Group at TDC to Mr Matt Bonis in his role as a s42A author as it relates to addressing submissions on the Growth Chapter of the Proposed Timaru District Plan (PDP).
- 3 **Attachment A** addresses the Three Waters (**3Ws**) assessment responding to those submission packages provided to the Timaru District Council in reply to the requests specified in the Section 42A Hearing G – Growth Preliminary Report, dated 29 October 2024¹ (**Preliminary Report**).
- 4 I confirm I have read the Code of Conduct for expert witnesses contained in the Environment Court New Zealand Practice Note 2023 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.



Kevin Kemp

30 May 2025

¹ https://www.timaru.govt.nz/__data/assets/pdf_file/0007/945511/TDC-Rezonings-Preliminary-Report-v3-Final.pdf

Attachment A: Response to Growth Submissions

The purpose of this attachment is to provide a Three Waters (**3Ws**) assessment responding to those submission packages provided to the Timaru District Council in reply to the requests specified in the Section 42A Hearing G – Growth Preliminary Report, dated 29 October 2024² (**Preliminary Report**)

The submission packages considered have sought 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.

General Considerations

The Three Waters Infrastructure Team provided a Memorandum as attached to the s42A Growth Preliminary Report (Attachment B to the Preliminary Report³). That Memo established the information and analysis that the Council Infrastructure Group required in advance of being able to properly assess the submissions seeking some form of urban / rural lifestyle rezoning and / or timetabling associated with FDAs.

The purpose of the request was to set out the requirements so that Council Officers could be fully informed of the Council infrastructure implications of the amendments proposed in submissions and to provide recommendations to inform the final Section 42A Report.

Specifically, the information requests predicated submitters providing technical analysis as to the provision of network infrastructure support and integration, where Council Officers have advised that there are no planned or funded extension for services into these areas. Implications for servicing were to include appropriateness for rezonings sought, and density and yield.

As a general comment, the submission packages do not provide sufficient analysis as to the provision of infrastructure servicing and / or implications where infrastructure funding is not provided in the Long-Term Plan.

I understand that the district plan policy settings for the efficient and effective infrastructure integration with urban and rural lifestyle growth (**EL-O1, SD-O8, and SD-O1(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.

When Long-Term Plan capital funds have not been allocated toward extension of networks to facilitate the re-zoning requests in the submissions, Council runs a risk of being obligated

² https://www.timaru.govt.nz/__data/assets/pdf_file/0007/945511/TDC-Rezonings-Preliminary-Report-v3-Final.pdf

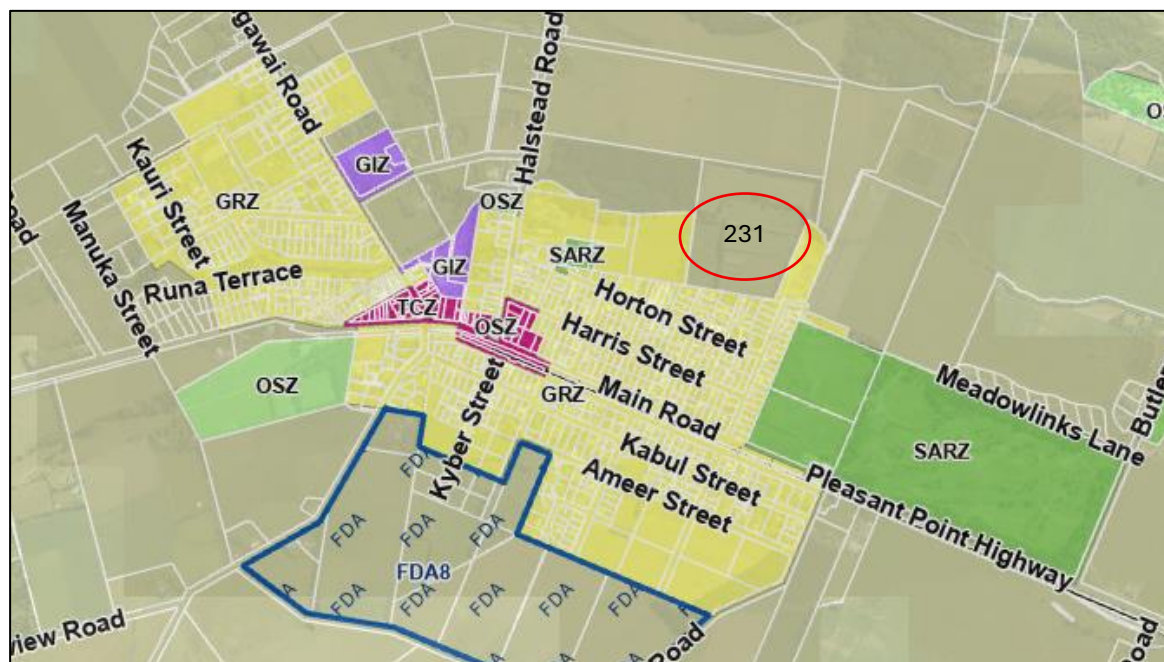
³ https://www.timaru.govt.nz/__data/assets/pdf_file/0010/945514/Attachment-B-Memo-TDC-Engineering-Requests-24-Oct-2024.pdf

to transfer funds from other priority capital works (renewal and upgrade of existing assets) to accommodate these developments at a limited benefit to the ratepayer. The provision of infrastructure to service re-zoning requests also risks the extension of network infrastructure where there is not a corresponding increase in household growth, essentially dispersing the network servicing infrastructure over a wider geographical area to inefficiently service a similar ratepayer base.

Pleasant Point

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
Submission and location:	<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>	


	There is no mechanism tying this to the rezoning sought in the submission.	
Comment:	<ul style="list-style-type: none"> • Insufficient detail supplied to support the rezoning. • More detailed structure planning required to support rezoning. • Request for rezoning to General Res should be rejected. <p>A consideration of each 3W matter is as follows:</p> <p>Stormwater</p> <p>The site is outside the Pleasant Point Stormwater Management Area, although bordered on 3 sides by the stormwater management area. The site would require consent from the Regional Council for Stormwater Discharge and development within Waterways.</p> <p>More detail on potential flood risk is required.</p> <p>Wastewater</p> <p>Comments provided about wastewater servicing but no detail. Impact on the network is required to be modelled.</p> <p>Water</p> <p>Water service extensions required. Impact on the network is required to be modelled.</p> <p>No funding exists to service these sites within the LTP.</p>	


Temuka


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>As noted by the submitter, extensive work needs to occur in relation to the serviceability of the area. The submission does not seek to change the FDA approach, so there is nothing additional to comment on other than noting the servicing constraints may impact on the achievability of a re-zoning through the FDA process.</p> <p>Recommendation is that the FDA approach be maintained. It should be noted that the infrastructure constraints may impact the feasibility of achieving a successful development moving forward, in which case the density would largely remain as currently present.</p>	

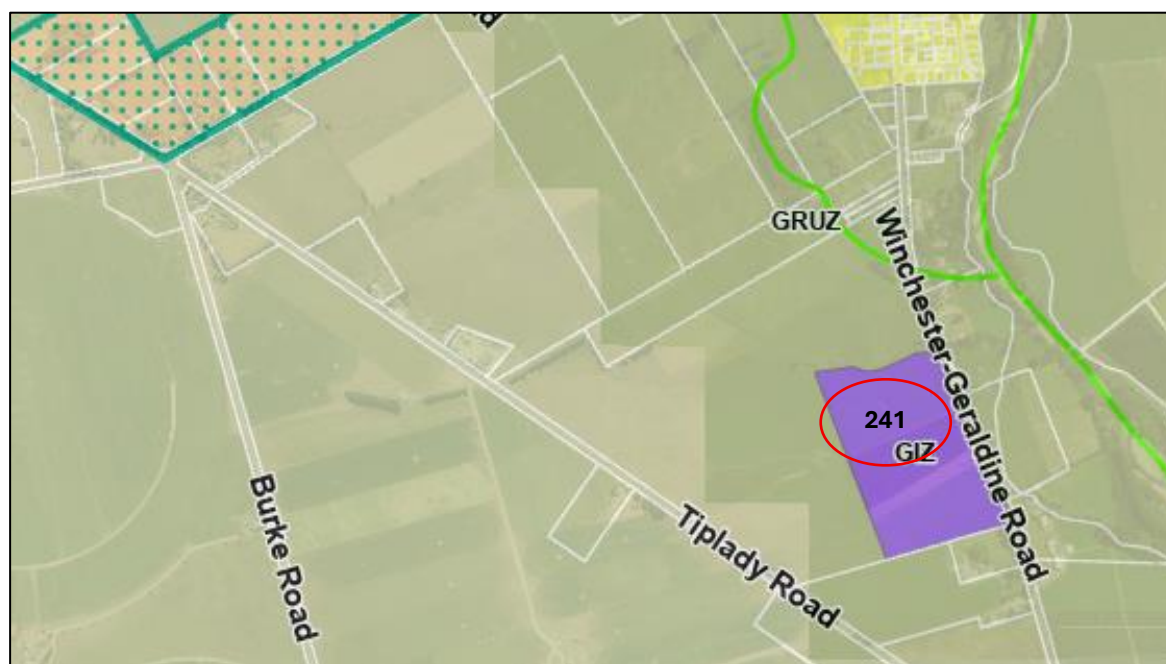
145	T Johnson	340 King Street
Submission and location:	<p>Site size is 0.96Ha.</p> <p>The submission seeks to rezone the property at 340 King Street Temuka. The submitter considers the property is not rural in nature, and seeks to rezone the property from General Rural Zone (GRUZ) to General Residential Zone (GRZ).</p>	
Comment:	<p>Servicing can be achieved, and effectively very modest yield.</p> <p>No concerns with re-zoning from a 3W perspective.</p>	

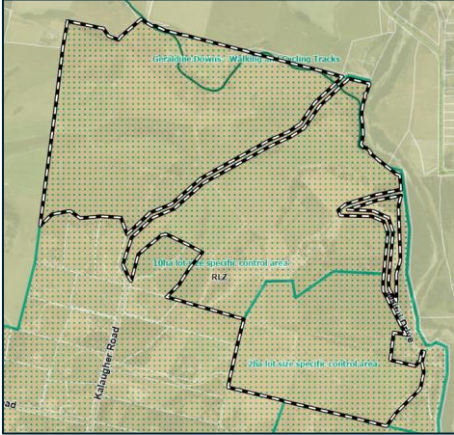
237	Aitken, Johnston and RSM Trust	26 and 52 Factory Road / FDA6
Submission and location:	<p>The amending proposal relates to a 17.93Ha block, which has an estimated residential yield of between 180 to 215 household allotments (10 – 12HH/Ha).</p> <p>The submission supports the intent of the Future Development Area Overlay (FDA6) across 26 and 52 Factory Road. 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>FDA approach and scheduling in SCHED15 is to be maintained. It should be noted that downstream infrastructure constraints (sewer network capacity limitation) may impact the feasibility of achieving a successful development moving forward. There is no funding identified in the LTP as associated with providing servicing for this area. Any prioritisation would affect other workstreams.</p> <p>A consideration of each 3W matter is as follows:</p> <p>Wastewater</p> <p>Impact of the proposal on existing Downstream sewer constraints has not been assessed. Structure Plan/DAP level of information and supporting plan to coordinate development and infrastructure to be embedded in the district plan. This level of information has not been supplied in the submitter package.</p> <p>Water</p> <p>Water supply capacity needs remodelling; peak demand coming in from the McNair reservoir to be confirmed. Structure Plan / DAP level details have not been supplied in the submitter package.</p> <p>Stormwater</p> <p>The site is presently outside the Temuka Stormwater Management Area. The site would likely require consent from the Regional Council for Stormwater Discharge.</p>	

Geraldine

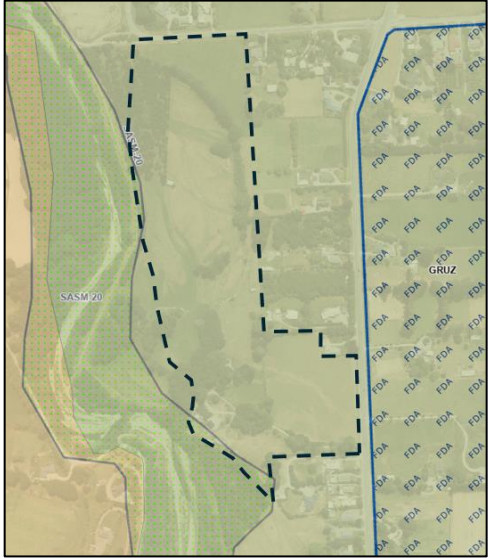
Five submission packages have been received in relation to Geraldine.

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

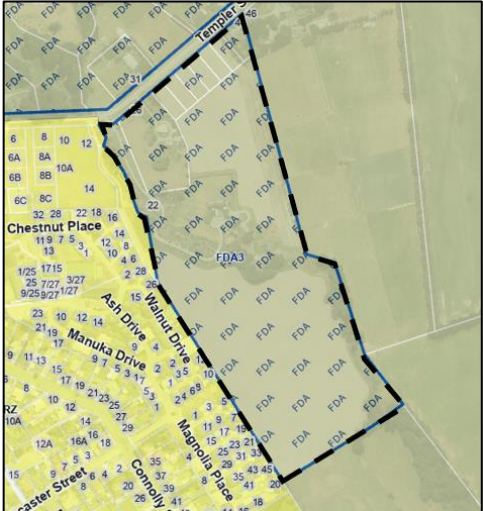


19	Waitui Deer Farm Ltd	199 Waitui Drive
Submission and location:	<p>The amending proposal relates to a 115.5ha block of land located to the north of Geraldine township and west over the Waihi River.</p> <p>The submission seeks to amend the minimum density size for Specific Control Areas in the Rural 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 Residential sub-zone 2ha; Rural Lifestyle sub-zone 10ha; and Rural Production sub-zone 40ha. These were essentially ‘rolled over’ into the TPDP.</p>	
Comment:	<p>The submitter has not quantified the likely impact on Council's network. In the absence of information to assess it is recommended that the submission be rejected.</p> <p>A consideration of each 3W matter is as follows:</p> <p>Wastewater</p> <p>The impact of on-site blackwater tanks should be further investigated because if an on-site solution via ECan is not achievable the waste inevitably ends up at a Council facility which still results in effects on Council infrastructure. Geraldine infrastructure is unable to accommodate the disposal of blackwater, meaning waste needs to be transported to Timaru for disposal.</p> <p>Water</p> <p>There is no explanation nor information relating to on-site constraints that would impact on the provision of a connection to Council's network. The size of sites if on-site wastewater proposal is occurring may limit the ability</p>	

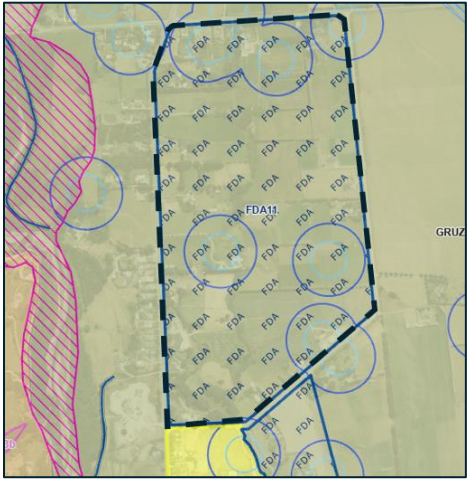
	<p>to install a bore for drinking water purposes. Te Moana Water Scheme Policy would apply for new connections.</p> <p>Stormwater</p> <p>Stormwater is managed on-site. Site is outside the Geraldine Stormwater Management Plan area.</p>
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32	Bruce Selbie	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> <p>The submission package identifies that the site is to be serviced by reticulated sewer network and water supply.</p> <p>No technical information on servicing is provided in the submission package. The submission package identifies a yield of <i>'4-5 allotments, with the potential for up to 10 x 5000 square metre allotments if future landowners decide to subdivide further and servicing allows for it'.</i></p>	
Comment:	<p>The submitter does not demonstrate how the site will be serviced. Considering the servicing of a single site in isolation is bad practice and may impact on the wider area into the future. No examples of what development of the site may look like, no impacts of the topography of the site on how it will be serviced. Private service extensions in such a linear and disjointed manner to service a limited number of rural lifestyle allotments (and the cost share so that costs do not fall on the wider ratepayer base) is a poor network outcome.</p> <p>There is no funding provided in the LTP associated with servicing this block, in isolation or in combination with proximate areas. Any funding</p>	

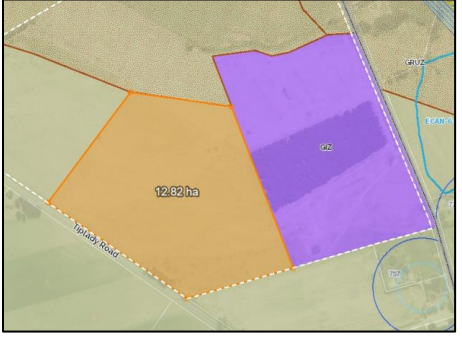
	<p>would have consequences in terms of impact and funding associated with planned workstreams.</p> <p>Water</p> <p>No modelling, funding or analysis has been provided to the Council demonstrating how this area would be effectively and efficiently serviced for reticulated Water Supply to accommodate the submission and associated rezoning to Rural Lifestyle Zone.</p> <p>Sewer</p> <p>No modelling, funding or analysis has been provided to the Council demonstrating how this area would be effectively and efficiently serviced for reticulated Sewer disposal to accommodate the submission and associated rezoning to Rural Lifestyle Zone.</p> <p>Geraldine infrastructure is unable to accommodate the disposal of blackwater if a connection or on-site disposal was not achievable, meaning waste from an on-site holding tank needs to be transported to Timaru for disposal.</p> <p>Stormwater</p> <p>The site is outside TDCs Current Stormwater Management Area. A discharge consent would be required from Environment Canterbury.</p>
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128	W & E Scott	22 Templer Street
Submission and location:	<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>	
Comment:	<p>FDA approach / scheduling in TPD is maintained. It should be noted that the infrastructure constraints may impact the feasibility of achieving a successful development moving forward.</p> <p>No funding exists to support the immediate re-zoning and there is a lack of detail as to how the proposal will be achieved in a manner that ensures the integrity of the existing network and apportioning of associated costs to the developer.</p> <p>The Infrastructure Servicing Assessment (Appendix 3) supplied in the submission outlines servicing based on 100 residential units.</p> <p>Water</p> <p>Water supply network upgrades identified. Funding of these upgrades not clearly articulated.</p> <p>Wastewater</p> <p>Wastewater servicing requirements identified, need for communal pump station or low-pressure network.</p> <p>Stormwater</p>	

	<p>The site is outside TDCs Current Stormwater Management Area. A discharge consent would be required from Environment Canterbury.</p> <p>No funding exists in the LTP to support this development in terms of servicing or development of a Development Area Plan.</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 DAP process is intended to support coherent development. Further ad-hoc development without any controls will result in additional constraints of reticulated services being provided into the future. Re-zoning to 5000m² minimum without a DAP process and a certain approach to the provision of water and wastewater reticulation is not supported.</p> <p>The existing disjointed nature of FDA 11 could lead to the establishment of inefficient and costly infrastructure to service sites in an ad-hoc manner. A cohesive landowner funded wastewater network extension (and associated infrastructure) would be challenged by the extent of</p>	

	<p>fragmented titles and additional beneficial yield to only a limited number of landowners within the block.</p> <p>The DAP process develops a structure plan that identifies how the proposed infrastructure for the area will be integrated into the existing network.</p> <p>Wastewater</p> <p>There is no funding identified in the LTP to provide or contribute towards reticulated wastewater infrastructure to service the area.</p> <p>The impact of on-site blackwater tanks should be further investigated because if an on-site solution via ECan is not achievable the waste inevitably ends up at a Council facility which still results in effects on Council's infrastructure. Experience suggests most people will seek a blackwater holding tank on-site rather than composting toilets. Geraldine infrastructure is unable to accommodate the disposal of blackwater, meaning waste needs to be transported to Timaru for disposal.</p> <p>Water</p> <p>The Te Moana scheme is for rural uses and the dispersal over residential sized lots is not anticipated. Te Moana Water Scheme Policy would apply for new connections.</p> <p>Lacks clarity of yield and the like over the entire FDA. The size of lots will impact the best way to service water if possible. An assessment of the impact of existing on-site wastewater disposal on any surrounding drinking water bores (if any).</p> <p>How an area wide network will be installed is not addressed and should be considered to understand costs and maintenance requirements moving forward.</p> <p>At 5000m² density the possible demand on the Te Moana – Geraldine Flat water scheme is significant and would require further modelling to confirm capacity. With the existing property fragmentation, 2Ha lot size minimums would allow for approximately an additional 6 allotments. The Te Moana – Geraldine Flat water scheme can accommodate this increase in demand.</p> <p>Stormwater</p> <p>No information provided to assess. The land area is outside the Geraldine Stormwater Management Area. Any requirement for ECAN consenting would be at the developers cost and should be completed in an integrated manner across the whole of the site.</p>
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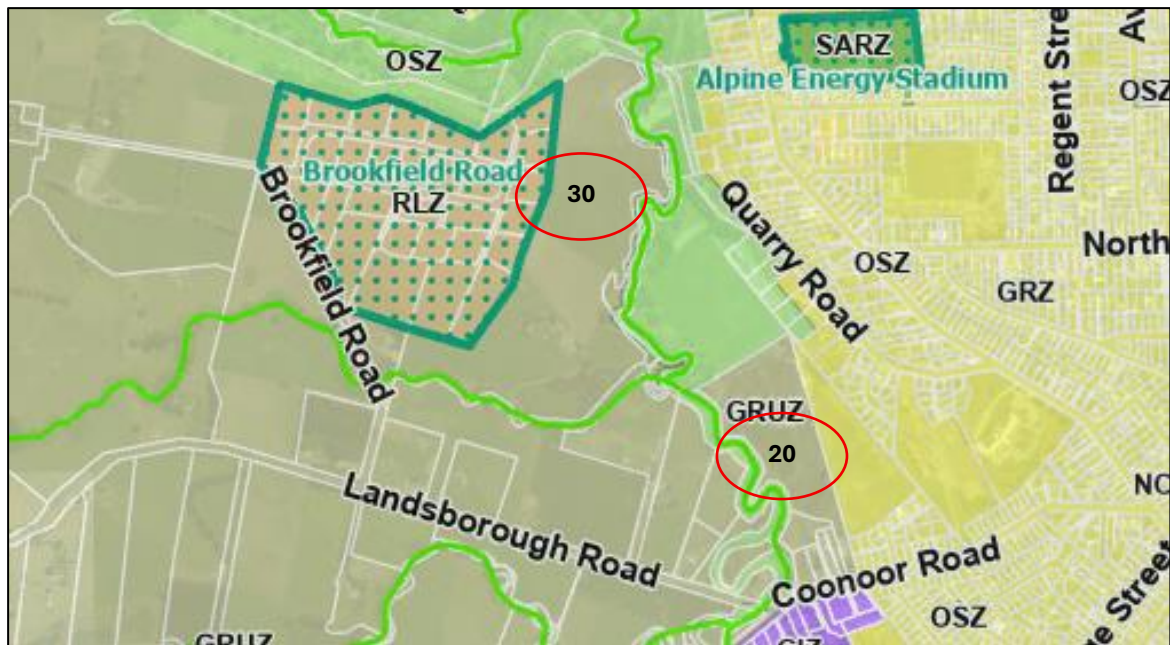
241	J Livestock Ltd	841 Tiplady Road
Submission and location:	<p>The submitter seeks to add a Future Development Area (FDA) overlay over 12.82ha of land between the notified GIZ to the south of Geraldine fronting Winchester-Geraldine Road to connect to Tiplady Road.</p> <p>The anticipated zoning sought 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>Supports the FDA if it is demonstrated this land is needed for industrial for the future as will allow for correct design to occur for servicing of the adjoining land if/ when it is developed.</p> <p>Should demand for additional land area be demonstrated, then any infrastructure sizing and capacity designs should allow for the future FDA as proposed in the submission, as servicing still needs to be designed and installed to the adjoining industrial land proposed by the TPDP. However, where demand is not required that would support an extension (noting the submission seeks an FDA with a 10+ DAP timeframe) then rightsizing infrastructure as required for the TPDP notified General Industrial Zone remains the appropriate approach in terms of providing for efficient infrastructure servicing.</p>	

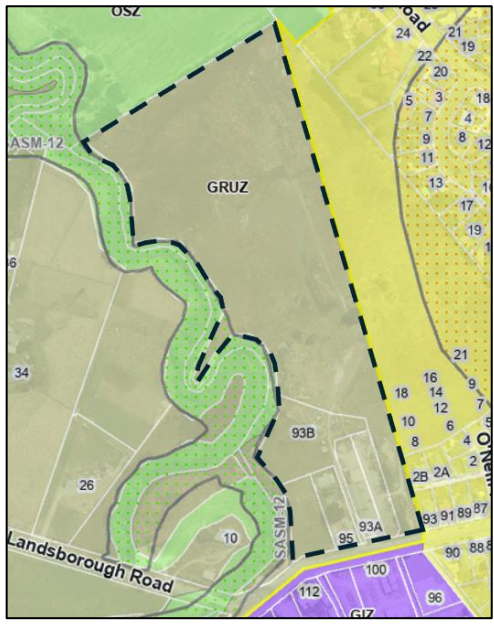
Timaru – Overall Dwelling Capacity overview

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 submission package identifies a yield of approximately 100 sections.</p> <p>The amending proposal adjoins the Ōtipua Creek to the west with the 'urban area' boundary to the east.</p>	
Comment:	<p>No technical information has been provided. It is noted that a request to Council for confirmation of servicing was made. Council is unable to provide confirmation of servicing when there is uncertainty in relation to design parameters such as design and yield.</p> <p>The submitter has not demonstrated how the servicing of the site will occur. Extensions are likely achievable but would need detailed modelling to fully understand the implications on Council's existing assets. Rezoning will simply defer this assessment to the time of a subdivision consent application which creates uncertainty as to the outcome for Council and the submitter. In the absence of design information, the submission should be rejected.</p> <p>Wastewater</p> <p>No information is provided as to certainty of intended yield or location of proposed services. Upgrades to existing infrastructure will likely be required with costs to be met by the developer. No funding exists in the LTP to support this development.</p> <p>Water</p> <p>No information is provided as to the certainty of intended yield or location of proposed services. Extensions to the existing network will be required. The applicant will need to meet the cost of any network upgrades. No funding exists in the LTP to support this development.</p> <p>Stormwater</p>	

	No information is provided as to the certainty of intended design (noting that 100 allotments contained in the submission package does not appear to take into account site context, geotechnical and flood management, or reserve requirements) or location of the proposed services. The site is adjacent to a sensitive environment and will require design to manage stormwater which would likely constrain yield. This will also require compliance with requirements of Environment Canterbury. No funding in the LTP exists to support this development.
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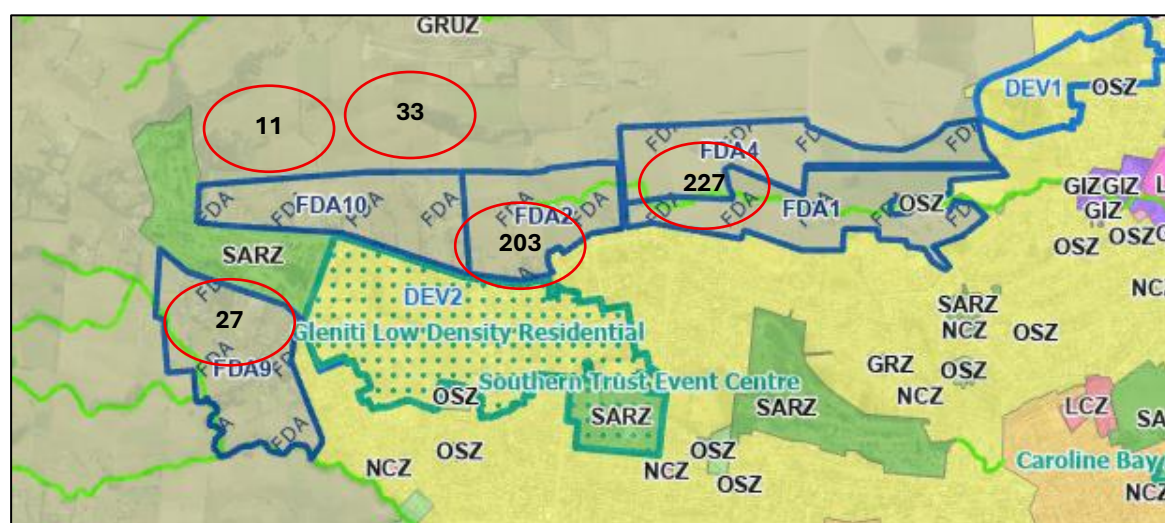
30	C & S McKnight	60 Landsborough Road, Timaru
Submission and location:	<p>The submitter seeks to extend the notified Specific Control Area overlay (Brookfield Road) and Rural Lifestyle Zone over additional areas legally described as Lots 5 and 6 DP502319 which has a combined land area of 26.7ha.</p> <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 Otipua 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>Water supply servicing confirmed available and sewer capacity may be achieved via additional onsite storage for the 5 new allotments. Allotments will be sufficiently sized to easily achieve the requirements of the LWRP.</p> <p>The rezoning to include the 5 allotments into the Brookfield Road Rural Lifestyle overlay is acceptable from a 3W perspective.</p> <p>Water</p> <p>Confirmation of water supply servicing 5 additional allotments via restricted supplies (1 unit of water per day - 1,000L) same as existing Brookfield Road servicing, supplied by the infrastructure unit.</p>	


	<p>Sewer</p> <p>Fluent Solutions report confirms the low pressure system and retention tank designed for 30 residential units. The existing development has generated 30 allotments. The additional allotments could be required to supply additional onsite storage than what was identified in the Fluent Solutions report for each allotment to allow for capacity in the downstream system.</p> <p>Stormwater</p> <p>Sites will be required to manage stormwater on site to the requirements of the LWRP.</p>
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Timaru North – Pages Road and Gleniti Road

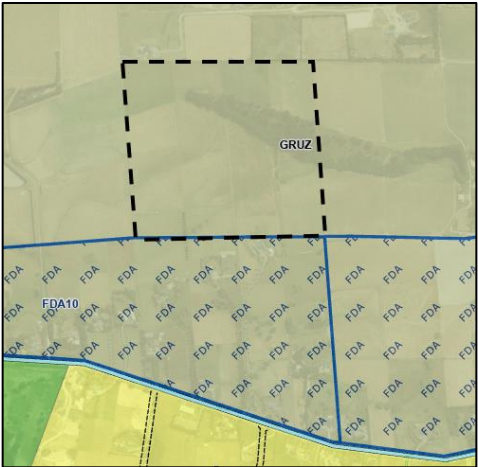
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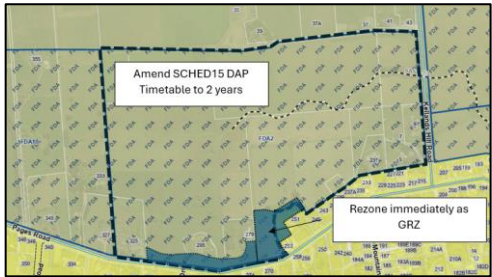
Sub No.	Submitter	Address
11	Gerald Morton	509 and 427 Pages Road, Timaru
27	Rabbidge, Singline and RSM Trust	210 Gleniti Road, Timaru
33	Pyke, Ford, Andrews, Talbot, Wilkins, Proudfoot, Craig and Mackenzie	333, 355, 365 375, 385, 397 and 403 Pages Road, Timaru
203	Pages Trust and Russell Trust	251,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



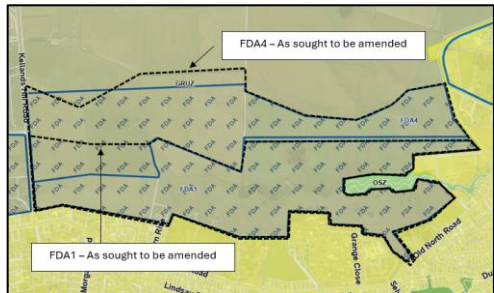
11	Gerald Morton	509 and 427 Pages Road, Timaru
Submission and location:	<p>The submission seeks to amend FDA10 should be extended to include 509 and 427 Pages Road, Gleniti.</p> <p>The associated area is 49.0 Hectares and consists of three moderate scale rural blocks of 17.2Ha, 22.0Ha and 10 Ha respectively.</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>Lack of information as to what the proposal seeks to achieve through an expansion to FDA10 means an analysis of the impact on Council's infrastructure is unable to be provided.</p> <p>There is no funding within the LTP that would be attributable to the expansion of the FDA. A reallocation of funding would also have flow on implications for funded and prioritised workstreams.</p> <p>Wastewater</p> <p>No information is provided as to intended yield or location of proposed services. A statement regarding on-site wastewater being provided for 2ha sites does not align with the proposed plan which allows for 5000m² sites if serviced. There is no explanation as to how the proposed extension will integrate with FDA10 as notified. The impact of on-site blackwater tanks should be further investigated because if an on-site solution via ECan is not achievable the waste inevitably ends up at a Council facility which still results in effects on Council infrastructure.</p> <p>Water</p> <p>There is no explanation relating to on-site constraints that would impact on the provision of a connection to Council's network. There is no explanation as to how the proposed extension will integrate with FDA10 as notified. No funding exists in the LTP to support this development.</p> <p>Stormwater</p> <p>Unable to provide comments there is no explanation as to yield or design that will impact on the provision of stormwater management.</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 Opitua 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>Bringing the timeframe forward has not been justified and would compete with other workstreams and associated funding. The DAP process needs to be completed to understand how the wider FDA can be serviced in an integrated manner. There is no information provided in the submission package that progresses a DAP process in terms of identifying infrastructure needs, funding and connections; nor provides rationale for why the SCHED15 DAP process should be commenced earlier than identified in the TPDP. The submission should be rejected.</p> <p>The submitter does not demonstrate how the entire FDA will be serviced in an integrated manner. The existing environment that consists of multiple land holdings creates the need for a coherent and integrated approach. An extension of existing networks will be required, and the multiple landowners will impact on the ability to provide a best practice network design. There is currently no funding allocated for future FDA works and bringing forward this FDA would potentially impact on other workstreams.</p>	

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 assessment is consistent to that associated with Sub. 11 Morton.</p> <p>Lack of information as to what the proposal seeks to achieve means an analysis of the impact on Council's infrastructure is unable to be provided.</p> <p>There is no funding within the LTP that would be attributable to the expansion of the FDA. A reallocation of funding would also have flow on implications for funded and prioritised workstreams.</p>	

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>At a micro level, as associated with 251, 273, 279 and 295 Pages Road the analysis of the immediate re-zoning to GRZ and how it impacts on the neighbouring FDAs should occur. The provision of services to the sites as shown is likely achievable and could be supported if deemed not to impact on future development of the wider FDA.</p> <p>There is a need to plan for servicing of adjoining FDAs in an integrated way. Ad-hoc re-zoning of these areas without understanding the impact on the wider FDAs will potentially result in additional costs and compromise the FDA process moving forward.</p> <p>Consideration must be given to the proposed Structure Plan of FDA 1, 2 and 4 and how the proposed infrastructure in this submission might impact the wider FDA servicing and connections.</p> <ol style="list-style-type: none"> 1. FDA in 2 years rather than five. No need to do this from a demand (and presumably efficient servicing perspective). Infrastructure Recommend to leave as is (5 years). 2. Rezoning of the blocks at Pages Road Frontage - Must provide for integration with existing infrastructure. The site could potentially be service now at developer cost. Confirmation to be provided that servicing may compromise broader FDA process and integration of infrastructure. <p>Wastewater</p> <p>The yield proposed in the wastewater servicing memo is for approximately 15 residential allotments and identifies options for servicing. Extension of wastewater services would be at the cost of the developer.</p> <p>Water</p> <p>Urban Water supply is present within Pages Road but extension of services would be at the cost of the developer.</p> <p>Stormwater</p>	

	<p>The subject site is within the Timaru Stormwater Management Area currently lodged with the Regional Council for the Timaru Global Stormwater Discharge Consent. Stormwater requirements for the site would be required to achieve the requirements of the Timaru Stormwater Management Plan.</p> <p>However, no funding exists to service these sites with network information within the LTP (either FDA4 or if network improvements are required for 251, 273, 279 and 295 Pages Road. Amending the SCHED15 DAP process from 5 years to 2 years is not supported.</p> <p>The DAP including Planning Policy for FDA 1, 2 and 4 is near completion to be available for the development community to take forward to a Plan Change process. The DAP package includes structure and precinct plans along with a planning framework.</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"> 1. <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> 2. <i>Undertake any consequential amendment to give effect to the rezoning and pathway for Development Area Plan preparation.</i> 3. <i>If the rezone is not accepted, then amend the FDA boundary lines between FDA1 and FDA4, and the northern</i> 	<p>The plan below shows the notified TPDP and the alignment relief as requested.</p> 

	<i>boundary of FDA4 as shown in the plan provided in the submission.</i>	
Comment:	<p>The Submission lacks sufficient detail to support the rezoning and does not address how this can be achieved in a way that meets the objectives of the PDP.</p> <p>Recommendations of individual submission points:</p> <ol style="list-style-type: none"> 1) Rezone FDA 1 as Res now - No. Reject due to a lack of detail around implementation and integration with adjoining FDAs and the necessary funding mechanisms. 2) FDA4 (less than 10 years) – No. Servicing not funded in LTP . 3) Amend boundary line of FDA1 (follows top of slope) – Agreeable as the original boundary between FDA 1 and 4 was aligned with a fence line rather than a topographic boundary. <p>The submission does not address how immediate re-zoning can occur in an integrated and cohesive manner as appropriately supported by network infrastructure. FDA 1, 2 and 4 Draft Infrastructure report included with submission identifies potential servicing options for the submission area. Ad-hoc re-zoning of these areas without understanding the impact on the wider FDAs will potentially result in additional costs and compromise the DAP process moving forward.</p> <p>The information relied on by the submitter does not demonstrate what mechanisms will be used to ensure the cost of servicing the area is apportioned to the developer. No planning framework has been supplied in the submission package that would demonstrate infrastructure integration and resolve funding issues such that the intent of the FDA and associated policies and objectives of the plan relating to efficient infrastructure integration and coordinated development would be achieved.</p> <p>The DAP for FDA 1, 2 and 4 are nearing completion. The DAP package includes suggested structure and precinct plans along with a possible planning framework. These documents will be available to inform any future planning processes if demand was to be shown. The mechanism to see any changes to current planning documents has yet to be discussed or decided with Council including funding (if needed) for this process.</p>	

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 trustees of Timaru Racecourse (at some 31ha, 330 Hilton Highway).</p> <p>The submission package is focused on 105 Kennels Road</p>	

	(that land owned by TDP at 17 Ha) and a yield of 150 lots at medium density is proposed.	
Comment:	<p>There is no infrastructure analysis associated with the submitter package.</p> <p>I am aware that both the Canterbury Regional Council [183.166] and NZTA [143.198] have submissions opposing FDA14.</p> <p>Bringing the timeframe forward as associated with the DAP Preparation process has not been justified. Considered against other existing FDAs that are located more proximate to urban areas, and infrastructure funding programs providing a more reactive DAP process for the site where there is an absence of demand and given likely network infrastructure costs will not advance the urban growth objectives of the TPDP.</p> <p>There is no funding identified in the LTP as associated with providing servicing for this area. Any prioritisation would affect other workstreams.</p> <p>No details are included as to servicing provisions for FDA14. Previous reporting by Council estimated that provision of services to the site in a manner that is efficient and maintainable to Council standard would range from \$13-15 million. No allocation of capital budget of this scale has been allowed for in the LTP for servicing growth.</p> <p>These servicing costs exclude any upgrades triggered to the downstream networks, flood mitigation measures and regional consents.</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:	<p>The rezoning of Lot 2 DP 39470, Section 5 Meadows SETT, and Section 17 Meadows SETT are presently covered by a designation for the Timaru District Waste Water Treatment Plant. This land does not require rezoning to be able to operate.</p> <p>Rezoning of the land presently consented for industrial activity would be reasonable, however sufficient evidence has not been supplied to support the rezoning of the balance of the area.</p> <p>Water and Wastewater</p> <p>Servicing of the site for Wastewater and Potable Water supply is proposed through extension of the urban network to service the 14ha land area adjoining Meadows Road.</p> <p>These service extensions have been approved through an Engineering Design following the issue of the land use consent for 236 Meadows Road.</p> <p>No evidence has been supplied to confirm how the additional 19ha (excluding the WWTP designation land) will be serviced and whether the consented network extension will be able to facilitate wastewater disposal and water supply for the additional area.</p> <p>Stormwater</p> <p>The site is outside the Washdyke Stormwater Management Area and any development will require consent from the Regional Council for discharge of stormwater.</p>	

248	White Water Properties Ltd	FDA13
<p>Submission and location:</p>	<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"> <i>1. Rezone all of the land in FDA13 to General Industrial, and</i> <i>2. 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 Industrial Zone and DAP preparation process of 10+ years in SCHED15.</p>	
<p>Comment:</p>	<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 infrastructure analysis supporting the submission package.</p> <p>No infrastructure to the site is proposed. This will impact on the overall management of Council's network now and into the future. The submission is recommended to be rejected on this basis.</p> <p>Sewer is not located near the site and would require significant extension and upgrades which are not identified in the LTP.</p> <p>There are concerns in relation to on-going management of servicing and the lack of detail as to what level of servicing is required from Council. If no Council servicing is provided there is the potential that any growth beyond the current planning process will be cost prohibitive to provide the servicing necessary to support a future land use.</p> <p>From a Three Waters perspective, the site is able to be serviced through network extensions and it is most likely suitable that such servicing would be for non-Trade Waste generating industries. Such network extensions are not forecasted in the LTP and any reprioritisation will impact other workstreams and capital work programs.</p>	