8 May 2017



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Mark Geddes Planning Manager Timaru District Council PO Box 522 Timaru 7940

Dear Mark

## **Environment Canterbury Submission on Draft Growth Management Strategy**

Thank you for the letter of 26 April 2017 and for the opportunity to submit on 'Timaru District 2045 – Draft Growth Management Strategy' (the Strategy).

Environment Canterbury supports Timaru District's move to a planned approach to future growth, and I am pleased to enclose our submission in support of the Strategy.

We have also taken the opportunity to request a stronger recognition of the need to improve environmental outcomes when planning for infrastructure to accommodate growth. We consider this addition will help future proof the Strategy, as environmental standards continue to tighten.

If you have any questions about the submission, please contact me or Andrew.

Kind regards

Carmel Rowlands \^\
Team Leader, Planning

Encl: Environment Canterbury Submission on "Timaru 2045"

Your ref:#1064873 Our ref: EC109365



### **ENVIRONMENT CANTERBURY Submission**

#### Timaru District Plan Review

# **Draft Growth Management Strategy**

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#### **Section B: Strategic Direction**

6 Environment Canterbury AGREES with the overall direction of the Draft Growth Management Strategy.

Environment Canterbury commends Timaru District Council for the process it is undertaking to develop a strategy for future growth, and has provided its endorsement of the Draft Strategy.

In particular, Environment Canterbury supports Timaru District Council's move to active management of growth, and the target of accommodating 75% of new growth through urban consolidation and some targeted rezoning. The overall approach appears well supported by the analysis of current capacity and future demand. The areas for future growth / consolidation appear to have been carefully selected, using a broadly-based set of selection criteria. The use of structure planning for new growth areas will result in better integration of land use and infrastructure.

Overall the Strategy gives effect to the Regional Policy Statement, particularly Chapter 5, Land-use and Infrastructure.

#### Section A: Rural Residential Development

5 Environment Canterbury STRONGLY AGREES with the more focused approach to Rural Residential Development in the Growth Management Strategy (the Strategy).

Managing future rural residential development through zoning rather than the current dispersed approach is a key element of the Strategy. It is strongly supported by Environment Canterbury, as it implements Policy 5.3.1 of the Regional Policy Statement.

### 7 Environment Canterbury AGREES with the approach to INFRASTRUCTURE

The approach to infrastructure appropriately emphasises -

- the strategic importance of infrastructure
- integration of infrastructure with growth
- infrastructure resilience, and
- the efficient use of existing infrastructure.

However, Environment Canterbury would like the Strategy to give more recognition to the need to address current and future environmental issues when planning for infrastructure.

We request that Directive Infrastructure 6 on page 58 is reworded to read (or similar) -

Manage the adverse effects from infrastructure on the environment, including avoiding <u>further such adverse</u> effects on significant natural and physical resources and cultural values <del>where practicable</del>, <u>and when renewing infrastructure or designing new infrastructure promote improved environmental outcomes wherever practicable</u>.

While the Strategy is not the key document for achieving environmental outcomes, it is designed to provide the framework for Council's other planning documents. Stating the intention of improving environmental outcomes through better design and use of infrastructure in the Strategy sends a clear signal about the importance of improving the state of the environment.

As noted in the Timaru Infrastructure Strategy 2015-2045, environmental standards for stormwater discharges have increased. The Canterbury LWRP requires treatment and attenuation of stormwater prior to disposal to waterways and the ocean. The increased national-level focus on water quality, including water quality in urban waterways, is also likely to "raise the bar" in this area. The Strategy can assist Council in preparing for these changes.

CARMEL ROWLANDS
TEAM LEADER PLANNING

(Authorised under delegated authority from the Canterbury Regional Council)

Date: 11/05/17

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