SUBMISSION TO THE

TIMARU DISTRICT COUNCIL

ON THE DRAFT GROWTH MANAGEMENT STRATEGY - 2045 BY



Federated Farmers of New Zealand (Inc) South Canterbury Provincial District (Inc)

11 May 2017

 Submitter:
 South Canterbury Federated Farmers

 Address for Service:
 57A Theodosia Street, Timaru

 Contact:
 Bob Douglas (Regional Policy Advisor - FFNZ)

 Tel. (03) 688 4096
 bdouglas@fedfarm.org.nz

1. Introduction

South Canterbury Federated Farmers (SCFF) appreciates the opportunity to submit on the Timaru District Council's Draft Growth Management Strategy.

SCFF supports the general tenor of the document. We believe it is a fair and honest appraisal of the situation currently within, and potential faced by the District, over the next decades.

In particular, we note the statement (A2.1) "It is important to acknowledge that the rates of growth identified for Timaru are not significant, both relative to New Zealand and also in terms of the existing district's population. This means that much of what is now in Timaru District will be present and provide the framework to anchor future growth to 2045."

This, aligned with the first sentence at F7.1 ("In 2045, the rural environment remains at the heart of the District's economy and our high quality productive soils are protected. Primary produce and agriculture will remain the main economic source of the District.") give us confidence that the strategy has been prepared from a realistic perspective.

We should also add that, while this strategy may reflect a heavy reliance on primary production into the foreseeable future, and our opinion would support this, we do support the principles at E2.6 that recognise the need to seek and take advantage of

Page

any other innovative or diverse opportunities for economic sustainability that may arise in the future.

2. Settlement Areas

2.1 Timaru. Strongly Agree

Statistical data in the Growth Assumptions indicates that the population will be fairly static over the 30-year term of this strategy. This suggests that there should be no significant demand for housing in the area. We acknowledge, however, that there is an increasing preference in some quarters for rural "lifestyle" residences and believe that the strategy makes adequate allowance for any demand for this style of living.

We would further support the consideration being afforded to modest increases in housing density within the urban area. Projected increases in the ratio of people in the 65+ age group, in the District as a whole, indicates that there will be a greater demand for smaller low-maintenance properties within a short distance from services.

2.2 Geraldine. Agree

Similar comments as at 2.1 above but we would have some reservations if the possible change in zoning from rural 2 to residential were to proceed on productive land on Orari Station Road.

2.3 Pleasant Point Agree

SCFF has some reservations on the Manse Road option for Rural Residential. Given the overall size of the township and the fact that sections are generally larger than other urban centres ("Additional Considerations" at 4.3.7 in the Options report) plus the fact that there is sufficient vacant and large residential zoned allotments within the existing town boundaries to accommodate predicted residential growth to 2028 (Options report 4.1.4), we question the need for any rural residential allowance.

2.4 Temuka Strongly Agree

Similar comments apply as for 2.1 above

2.5 Rural Residential Strongly Agree

We refer again to the vision at 7.1 "In 2045, the rural environment remains at the heart of the District's economy and our high quality productive soils are protected. Primary produce and agriculture will remain the main economic source of the District" SCFF is opposed in principle to the conversion of valuable productive land to other uses without very good reason. We temper this statement, though, with the recognition that there is ongoing demand for "lifestyle" blocks. Consequently, we support the proposal for a more focussed approach to such developments.

3. Strategic Direction

3.1 Overall Direction Agree

SCFF Timaru GMS Submission 2017

As per our introduction, SCFF supports the general tenor of the document and the fact that, in our opinion, it is pragmatic in its approach.

The essential need for such pragmatism is, perhaps, best demonstrated in the statement at A2.4 "A key demographic challenge for the district to face is that the districts elderly population (over 65 years of age) will increase from a ratio of 1:5 people in 2013, to 1:3 people by 2033. This has significant consequences in terms of household demands, employment growth and service provision."

We note, from figure 1.3 in the Growth Assumptions, that this ratio is expected to increase further over the total date range of this plan. This means that an increasing number of Timaru District residents will be on a fixed income, with increments limited to that shown in the national CPI. Any enforced expense, over that CPI rate, therefore will not be contributing towards the building of resilient communities (Strategic Direction 4)

It is regrettable that one of the most consistent transgressors in increasing costs is the Timaru District Council whose residential property rates have risen by some 56% above the nation-wide rate of inflation over the past 10 years. We acknowledge that this is a Long Term Plan issue but would suggest that this document would have more credibility if it were to indicate that any proposal would be progressed only if it were reasonably sustainable for ratepayers. We have suggested a slight change to SD4 (ii) to reflect this.

3.2 District Character Strongly Agree.

In particular, SCFF supports the retention of "(iii) the retention of the character and productive capacity of rural areas."

3.3 Landscapes and Amenities Agree

While the objectives are laudable, on the face of it, part iii should also reflect existing use rights and the overall wellbeing of the community. There would, perhaps, be some merit in qualifying this with a statement that clarified that the requirement would be applied to new industries only.

We regard it as unfortunate that the strategy does not see fit to include consultation with landholders in either the dialogue or directives at E2.2 particularly in relation to access. Many of these "values" are still on private land – and co-operation with this sector is often the simplest way of achieving the objectives. As worded E2.2 suggests that the sole way of accomplishing this is by Council taking sole responsibility.

3.4 Settlement patterns Strongly Agree

Managed development of these activities is supported

3.5 Building resilient communities Agree

There is little purpose in any planning if it does not work to the ultimate benefit of the community. For this reason – and in line with our comments at 3.1 above – we recommend that part (ii) of this objective be changed to read:

(ii) to encourage the provision of facilities, services and accessible transport options that respond to the changing social, recreational, civic and health demands of the district *and that are within the financial capacity of its citizens*.

3.6 Takata Whenua Agree

This would be a basic component of providing for the cultural wellbeing of the community.

3.7 Sustainable economy Agree

In some ways this is repeating objectives outlined under SD1 and SD3.

We also have some trepidation about the use of the word "support" if this were to mean any significant Council financial subsidy of selected activities. (This includes directive 3 at E2.6). "Encourage" may be more appropriate.

3.8 Transport Agree

The key word here is "efficient" (SD 6 under A2.3 and directive 2 at 2.7)). There is plenty of scope within the District for transport options to be improved. However, it has to be accepted that there is a small and static population base and the "ideal" may not be practical from the economic perspective.

We cannot over-emphasise the importance of references to access to the port of Timaru – including directive 4 at 2.7 "*Recognise and provide for the benefits of strategic transport infrastructure, being the State Highway, Rail, Timaru Airport and the Port of Timaru.*"

The port is a major outlet for our (processed) primary products. It is a major player in the District's economy in its own right and its board has shown an extraordinary ability to overcome adversity in various guises in recent times.

One adverse factor is access via SH1 from both north and south once the State Highway reaches the Timaru town boundary. We believe that the need to improve this access should be singularly identified in table 9 by inclusion in action 7.6

3.9 Infrastructure

Partial Agreement

There are basic District Council responsibilities of diligent management included under this heading. In addition, the strategy (2.8) makes reference to other strategic infrastructure. In many cases the local community's responsibility to protect that infrastructure is detailed in some form of national directive (e.g. NPS) Despite this protection, some national infrastructure operators have sought to impose further restriction on local communities. We believe this strategy should indicate Council's willingness to fulfil its national obligations while, at the same time, defending the rights of it own citizens and recommend that directive 5 at 2.8 be amended to read:

"Infrastructure 5: <u>Within the requirement of any National Policy Statement or</u> <u>other directive protect strategic infrastructure from incompatible and sensitive</u> activities, including from reverse sensitivity effects."

Deleted: P

SCFF Timaru GMS Submission 2017

3.10 Rural

Strongly Agree

SCFF believes that the commentary and proposed policies reflect well the requirement of the rural/productive sector while allowing for other values.

3.11 Residential

Strongly Agree

SCFF believes that the commentary and proposed policies analyse well the future residential needs of the District. We strongly support the proposals to give priority to development within existing urban boundaries. Growth Assumptions and other related documents indicate that there is likely to be a minimum of need to expand urban development beyond these boundaries.

3.12 Community and open space Agree

3.13 Leadership and partnership. Strongly Agree

The sentiments expressed in this section are fully endorsed by SCFF. Wide community consultation is essential in any Community strategy or planning document. In association with this South Canterbury Federated Farmers would definitely wish to be involved in any further consultation relating to this strategy.

4. Key Challenges

4.1 Community expectation **Disagree**

We regard the wording at "c" as being contradictory. We fully support the statement that Council has a role in integrating and managing growth and overseeing the fair distribution of costs. However, we question the rider "do not fall predominantly on the wider community".

Many controls are imposed, through the Resource Management Act and other legislative provisions, on selected sections of the community on the pretext that these are "what the community wants". It is our belief that the costs of any control imposed by a community on a single sector, should be paid for by that community.

We suggest that the words "do not fall predominantly on the wider community" are deleted from C:2 (3) of the proposed strategy (and 8.c of the submission form)

Mark Adams (President, South Canterbury Federated Farmers)