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**SUBMISSION TO TIMARU DISTRICT COUNCIL**  
**on**  
**Timaru District 2045 Draft Growth Management Strategy**

In this submission, I wish to congratulate the Timaru District Council on the 'Set' of documentations they have prepared, which include "The Strategy, The Options and the Growth Assumptions". I wish to recognise the significant work included in all their documents and to also congratulate the authors on the layout, which provides a background to the decision making.

I wish to comment principally on Parts E and F of the Growth Management Strategy (GMS), but also making reference to the Growth Assumptions (GA) which provide background to those parts.

**A. GROWTH MANAGEMENT APPROACH** Reference Part E of GMS

A.1 This document informs that there will be a significant drop in the working population, which implies a "drop" in the district Gross Domestic Product, services, ability to service and maintain current infrastructure, and assistance in providing additional services and facilities. This should be seen as an opportunity for growth, as it implies we have the jobs available, but will lack the people to fill them, which could lead to a greater decline if businesses are forced to go elsewhere. This effects your plan, as the change in working population is approximately 3,920 people or an additional 1,960 households if all jobs were replaced. Refer Appendix I.

A.2 Even if only 50% were retained, this would be an additional 980 households or a 45% increase on current forecast. I believe that this is the challenge and the opportunity for the District and the Timaru District Council as a leader must provide sufficient additional land for this so that housing is not a deterrent for employers wishing to bring new employees to the district.

**B. GROWTH MANAGEMENT STRATEGY TARGET**

B.1 The current Report indicates a target of wanting to achieve 75% of population growth through consolidation of the existing urban areas.

B.2 In Summary ignoring buffers, the current strategy proposes:  
Total new households = 2,211 (Page 43).



Projected household demand 2,043 without buffer:

Area	Residential	Rural Residential	Rural (Assumed)
Timaru	380	330	
Temuka	148	90	2,211-907-540 = 764
Geraldine	143	90	
Pleasant Point	236	30	
<b>Total</b>	<b>907</b>	<b>540</b>	

25% total growth =  $25\% \times 2,211 = 552$  houses to be rural

75% total growth =  $75\% \times 2,211 = 1,658$  houses to be urban

B.3 The target is not reflected in the projected demand. If you have a target of 1,658 urban households you must provide for this.

B.4 If this 1,658 was proportioned into the urban areas based on the forecast demand in these areas (how else might we do it?), the revised demand would be:

Timaru $380 \times (1,658/907)$	= 694 +15% buffer	=	798
Temuka $148 \times (1,658/907)$	= 270 +15% buffer	=	310
Geraldine $143 \times (1,658/907)$	= 261 +15% buffer	=	300
Pleasant Point $236 \times (1,658/907)$	= 431 +15% buffer	=	495
<b>TOTAL</b>	<b>= 1,656 +15%</b>	<b>=</b>	<b>1,904</b>

Available land zoned or to be zoned (assuming 1 house per 845 m<sup>2</sup> of zoned land).

Timaru	667 houses plus infill	(@ 18% = 120)	=	787
Temuka	141 houses plus infill	(@ 18% = 25)	=	166
Geraldine	331 houses plus infill	(@ 18% = 60)	=	391
Pleasant Point	<u>129</u> houses plus infill	(@ 18% = <u>23</u> )	=	<u>152</u>
	1,268	+	228	= 1,496

This produces demand in excess of planned availability in all areas, except Geraldine.





That is at least 408 less than required, significantly less in Temuka and Pleasant Point. Pleasant Point numbers look unrealistic but if redistributed to Timaru or Temuka that would create a further lack in capacity of zoned land in these areas, although we acknowledge there is an unspecified residual availability in Zone 6b.

**C. GROWTH SETTLEMENT PATTERNS** Reference Part E of GMS

- C.1 The change in population statistics indicate that if we were to obtain new workers for only 50% of the jobs being given up, and provide housing for these (at 2 adults per house) then additional dwellings required for the various urban areas would create the following household demand.

Area	Original Strategy Urban	Replacement Workers	Total A & B
Timaru	380	2,900/4 = 725	1,405
Temuka	148	340/4 = 85	323
Geraldine	143	150/4 = 38	271
Pleasant Point	236	0	266
	907	848	

Available land zoned or to be zoned produces:

		Shortfall	Additional land required
Timaru	787	618	52 hectares
Temuka	166	157	12.7 hectares
Geraldine	391	-	
Pleasant Point	152	114	9.6 hectares

- C.2 This assumes that the target of 75% of new homes to be in urban areas is dropped. If it was not dropped it would require an additional 63.4 hectares of additional urban land somewhere.
- C.3 I believe a target for the Council, wishing to retain our businesses and lifestyle should be to retain at least 50% of the jobs, which will be given up and this would require additional workers to come to the district of  $3,390 \div 2 = 1,695$  employees. This would require a minimum of 848 additional households over previous forecast.



## **D BASED ON THE REVISED PROJECTIONS**

Based on the revised projections in C.1 which assumes the target 75% : 25% urban rural distribution of new dwelling is dropped.

D.1 Geraldine: Appears to handle the expected new workers.

D.2 Temuka: Has a significant deficit in urban zoned land of 12.7 hectares.

Of the land which is zoned we are doubtful that the Timaru District Council study of developable land will be realised as significant areas of land indicated as available is either filled sites, floodable or has other significant features which make it undesirable to develop. We note the Timaru District Council hasn't recorded what is an acceptable risk in terms of flooding, allowing land to be suitable for development. We believe significant areas of land zoned Residential is inappropriate, and alternate land should be provided to limit development in these areas.

D.3 Pleasant Point: Has a significant deficit in urban zoned land of 9.6 hectares. We note, like Temuka, significant areas of residential zoned land is floodable. Again we consider additional alternate land should be zoned to limit development in these areas and the exposure to post flood recovery costs for landowners.

D.4 Timaru: Has a deficit of some 52 hectares should we wish to provide housing for 50% of the new workers we could provide jobs for. Optimistically the most that could be expected from housing infill would be a reduction of 10 hectares on the 52 hectares required.

## **E RURAL RESIDENTIAL**

E.1 The strategy provides for new 541 Rural Residential dwellings in the 30 year period (18 per year) based on the demand from the previous 10 years. We believe those figures are not consistent with the true demand due to:

E.1.1 The Pilcher v Rawlings court case [2013 NZENVC67] at 348 Gleniti Road Timaru, which declined a Discretionary Rural 1 subdivision consent in 2013.

E.1.2 Subdivision within the Rural 1 zone within the Timaru District since 1995 and the drawn out nature of the Pilcher v Rawlings case, lower than average subdivision consents for smaller rural allotments preceded the 2013 court case by at least 2 years.

E.1.3 The Global Financial Crisis of 2008 and 2009 had a significant impact on land development and bank lending, which in turn significantly impacted on the construction of new dwellings within the District.





- E.1.4 The age of the current District Plan Rules in relation to subdivision entitlements within the Rural 1 zone is also relevant, as those Rules date back to 27 August 1988. The majority of land owners that desired to achieve Rural Residential subdivision for allotments under 2 hectares in area in terms of those entitlement Rules, had generally completed subdivision prior to 2005.
- E.1.5 At the time there was a general expectation that the Timaru District Council would introduce new subdivision rules in October 2005 (being the 10th Anniversary of the District Plan notification date), however this did not eventuate and these same Rural 1 subdivision entitlement rules still apply today.
- E.1.6 This resulted in an increased number of subdivision entitlements being utilised for allotments with areas less than 2 hectares in the years leading up to 2005 and a corresponding lull in the subdivision of smaller rural living allotments after 2005.
- E.2 Based on the foregoing, we believe that Council's conclusion that "18 dwellings per year will be required to service the Rural Residential needs of the District" (quoted from page 83) is substantially under estimated, particularly when this is considered in terms of Council's recommendation that only 11 (or 330 over 30 years) of those 18 dwellings per annum, should be constructed on the Timaru fringe.
- E.3 Whilst the NZ Statistics 2013-2043 forecasts clearly demonstrates the increased aged population within the Timaru District, we foresee significant demand for modern household units to be constructed on Greenfield Residential Rural and also Rural Residential areas utilising modern building materials, double glazing, efficient heating and insulation, solar power, and the like, close to amenities.
- E.4 As a generalisation, retirees from Rural areas including the 'baby-boomer' generation (born in the period 1946-1964), we anticipate would be predominately debt free and would seek to build modern dwellings in Greenfield areas where they have some control over landscape, topography, outlook, solar advantage, urban amenity close to recreational interest.
- E.5 Based on E3, E4 and this submissions projection of the demand we should be providing for, some of which could well go into rural/residential properties, particularly around Timaru (because of job availability) then we see a significant increase in demand over that envisaged in the current strategy of only 11 properties per year around Timaru.



**F TIMARU INDUSTRIAL**

- F.1 My experience with Industrial zoned land is that few industries wish to be developers. Their expertise is in their industry, and when building they seek to purchase already developed, fully serviced land. Due to the Timaru District Council zoning land but not providing for its servicing, there has been significant frustration for both potential purchasers and developers.

**G. GROWTH ASSUMPTIONS – PAGE 9**

- G.1 The proposed strategy limits the supply of residential and business land for fear of adverse consequences.
- G.2 As a practitioner involved in land development I would argue the opposite, the plan should provide guidance on greater than our immediate needs.
- G.2.1 A plan showing Zones and specifying an order of development, and an order in which services will be provided will be more efficient, less disjointed and will provide more certainty.
- G.2.2 This approach does require a more detailed assessment of catchments prior to Zoning. However this has been a past failure i.e. zoning land without a plan for servicing.
- G.2.3 I would promote zoning more land than required, indicate a preferred order, or staging of development with servicing.

**H CONCLUSION AND DECISION SOUGHT**

- H.1 Inadequate consideration has been given to the target of 75% of all new dwellings being in the urban area, and the available zoned land cannot achieve the target. We seek a review of the target to more closely match historical building consents of 60/40 rural urban distribution.
- H.2 Inadequate consideration has been given to our communities future opportunities and what will need to be done to achieve our current amenities and quality of life in the District.
- We seek a recognition in the plan of a desire to replace employees as they retire and so grow our population. This recognition should include sufficient additional zoned land both urban and rural residential to cater for the new employees to the district.



H.3 We believe inadequate evaluation has been made of the demand for rural/residential lifestyle blocks, a character of our region, which should be properly provided for. A proper evaluation should be made as a distinct category and appropriate land zoned to meet the demand. The plan, while it should recognise the Regional Council Policies, should be a plan which serves its community and satisfies its communities demands.

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Attachments: Appendix I Estimate of Change in Working Population



## APPENDIX I

### ESTIMATE OF CHANGE IN WORKING POPULATION

Change in population 65+ is from 1/5 to 1/3 of (Page 11 of GMS).

i.e. 1/5 of 45,400 = 9080

1/3 of 48,600 = 16,200

Working Population now = 45,400 – 9080 = 36,320.

Working Population 2043 = 48,600 – 16,200 = 32,400.

Note: Population under 14 remains static.

Possible drop in employment = 3,920.

Possible new household replacement = 3,920

2.0

TOTAL = 1,960 Households.