

Form 5

# Submission on Notified Proposal for Plan, Change or Variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Timaru District Council

Name of submitter:

John Leonard SHIRTCLIFF & Rosemary Jean SHIRTCLIFF

[State full name]

This is a submission on the following proposed plan or on a change proposed to the following plan or on the following proposed variation to a proposed plan or on the following proposed variation to a change to an existing plan) (the 'proposal'):

Proposed District Plan

[State the name of proposed or existing plan and (where applicable) change or variation].

I ~~could~~/could not\* gain an advantage in trade competition through this submission.

[\*Select one.]

~~\*I am/am not† directly affected by an effect of the subject matter of the submission that  
(a) adversely affects the environment; and  
(b) does not relate to trade competition or the effects of trade competition.~~

[\*Delete or strike through entire paragraph if you could not gain an advantage in trade competition through this submission.]

[†Select one.]

The specific provisions of the proposal that my submission relates to are: [Give details]

1. Proposed rezoning of our property at 584 Orari Station Road as RLZ
2. Subdivision SUB-S1.4 Allotment Sizes and Dimensions RLZ - Wastewater
3. Subdivision SUB-S3.2 Water Supply RLZ
4. Transport TRAN-S10 Accessway sealing

My submission is: [Include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views]

[If your submission relates to a proposed plan prepared or changed using the collaborative planning process, you must indicate the following:

- Where you consider that the proposed plan or change fails to give effect to a consensus position and therefore how it should be modified; or
- In the case that your submission addresses a point on which the collaborative group did not reach a consensus position, how that provision in the plan should be modified.]

## 1. Zoning

- 1.1. It is presently proposed that the entirety of our property be rezoned as RLZ. This is a decision that we largely support subject to the following representations.
- 1.2. Despite an increase in zoned Residential land, it is considered that there will remain a shortage in new residential supply in the short to medium term as there will be inevitable delays in bringing some of that rezoned land to market.
- 1.3. It is our view that RLZ is an entirely suitable zoning for the portions of the property that lie to the North of the Raukapuka Stream course. Access may be provided via Tancred Street, possibly Campbell Street and/or from Orari Station Road.
- 1.4. There is an approximately 4 ha block of the property to the South of the Raukapuka Stream that is eminently suited to more intensive subdivision or Residential zoning being immediately adjacent and contiguous to:
  - .The road frontage of Orari Station Road
  - .The urban boundary and transport connections of the existing Geraldine township
  - .Geraldine water reticulation
  - .Geraldine sewer reticulation,

and in close proximity to:

- .Geraldine High School
- .Town business district and shopping (10-minute walk).

- 1.5. This opportunity to secure a high-quality addition to the residential land pool will offer, once lost, a longer-term challenge to the future expansion of Geraldine and availability of new and higher quality housing stock in the sought-after Raukapuka locale.
- 1.6. The opportunity also exists to design a more intensive subdivision of the land to provide a more pleasing transition between urban intensification to the contiguous rural environment and amenity displayed further along Orari Station Road to the East.
- 1.7. There is a 13 hectare block available for subdivision and expansion of the Geraldine conurbation that is directly contiguous and readily connected with existing Geraldine infrastructure. It would be derelict if the Proposed District Plan were not to maximise the expansion opportunity presented by these lands.

## **2. Subdivision SUB-S1.4: Allotment Sizes and Dimensions RLZ**

- 2.1. The requirement for subdivision within the RLZ to be to a minimum area of 2 hectares in the absence of connection to a sewer reticulation network is an unnecessary impost upon the available RLZ lands. A number of considerations arise:
- 2.2. In order to provide certainty to the subdivision of RLZ land and, in particular, the subject land, it is necessary to provide a statement as to the availability of a sewer reticulation connection to the adjacent Geraldine sewer network.
- 2.3. There appears to be a contradiction between the proposed Timaru District Plan and the requirements imposed by the Canterbury Land and Water Regional Plan that will require resolution. It is further noted that the required minimum separation distances (by the Ecan Canterbury Land and Water Regional Plan Rule 5.88 and the associated Rule 5.9 defining Restricted Discretion where there is non-compliance with Rule 5.8) between water abstraction and wastewater disposal sites may be readily be achieved for the land to the north of Raukapuka Stream yet may not comply with the more restrictive (as to site size) requirements of the proposed plan.
- 2.4. We hold six existing (but not yet operative) Ecan wastewater consents for the land to the north of Raukapuka Stream in anticipation of subdivision into lots which may be less than the 2 hectare size proposed by the new District Plan. The relevant consent reference numbers are CRC 103524,110024/5/6/7/8.

## **3. Subdivision SUB S3.2: Water Supply**

- 3.1. The requirement for subdivision within the RLZ to be to a minimum area of 2 hectares in the absence of connection to a water reticulation network is an unnecessary impost upon the available RLZ lands. A number of considerations arise:
- 3.2. In order to provide certainty to the subdivision of RLZ land and, in particular, the subject land, it is necessary to provide a statement as to the availability of water reticulation and from which source.
- 3.3. There appears to be a contradiction between the proposed Timaru District Plan and the requirements imposed by the Canterbury Regional Policy Statement that will require resolution. It is further noted that the required minimum separation distances (by the Ecan Canterbury Land and Water Regional Plan Rule 5.8 and the associated Rule 5.9 defining Restricted Discretion where there is non-compliance with Rule 5.8) between water abstraction and wastewater disposal sites may be readily achieved for the land to the north of Raukapuka Stream yet may not comply with the more restrictive (as to site size) requirements of the proposed plan. We note that our prior enquiry has resulted in the complete dismissal (by Timaru District Council) of a possible connection to either the Te Moana scheme or the Geraldine water reticulation network.
- 3.4. The costs of any potential connection to the Te Moana scheme are excessive in relation to the cost of establishing alternative ground water bore sources of water or connection to the immediately adjacent Geraldine reticulation network.
- 3.5. We hold six existing (but not yet operative) Ecan wastewater consents for the land to the north of Raukapuka Stream in anticipation of subdivision into lots which may be less than the 2 hectare size proposed by the new District Plan. The relevant consent reference numbers are CRC 103524,110024/5/6/7/8.

4. The requirement to seal an RLZ accessway for 20 metres from the road appears to be an unnecessary requirement that will add further and appreciable cost to subdivision within the RLZ to no obvious benefit over the existing and proposed Rural zone requirement to seal to the property boundary.

**I seek the following decision from the local authority:** *[Give precise details as this is the only part of your submission that will be summarized in the summary of decisions requested]*

1. Revisit the proposed rezoning of our property to permit or facilitate (via restricted discretionary provisions) a more intensive or Residential subdivision of the portion of the land to the South of Raukapuka Stream along the Orari Station Road frontage.
2. SUB-S1.4 Drinking water:
  - a. Declare that the subject lands will be provided with a connection to the Geraldine water reticulation network.
  - b. Make allotment sizes below 2 hectares a matter for restricted discretion (where water network connections are not available or are reliant upon an alternative water source) subject to achievement of satisfactory separation between water abstraction and wastewater disposal sites in compliance with Ecan's Canterbury Land and Water Regional Plan Rule 5.8 and the Restricted Discretion provisions of Rule 5.9.
3. SUB-S3.2 Wastewater
  - a. Declare that the subject lands will be provided with a connection to the Geraldine sewer network.
  - b. Make allotment sizes below 2 hectares a matter for restricted discretion (where sewer network connections are either not available or prohibitively expensive and/or are relying upon an alternative sewer disposal site) subject to achievement of satisfactory separation between water abstraction and wastewater disposal sites in compliance with Ecan's Canterbury Land and Water Regional Plan Rule 5.8 and the Restricted Discretion provisions of Rule 5.9.
4. TRAN-S10:
  - a. Amend the Proposed District Plan to adopt Rural zone accessway sealing requirement for RLZ requirement in TRAN-S10.

**I wish ~~(or do not wish)~~ to be heard in support of my submission.**

*[\*In the case of a submission made on a proposed planning instrument that is subject to a streamlined planning process, you need only indicate whether you wish to be heard if the direction specifies that a hearing will be held.]*

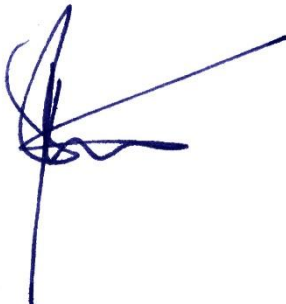
*[†Select one.]*

**\*If others make a similar submission, I will consider presenting a joint case with them at a hearing.**

*[\*Delete if you would not consider presenting a joint case.]*

.....  
**Signature of submitter (or person authorised to sign on behalf of submitter)**

*[A signature is not required if you make your submission by electronic means]*



**Date** 15<sup>th</sup> December 2022

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**Contact person:** *[name and designation, if applicable]* .....

**John Shirtcliff**

**Note to person making submission**

1. If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.
2. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
  - It is frivolous or vexatious:
  - It discloses no reasonable or relevant case:
  - It would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
  - It contains offensive language:
  - It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matter.

Doc# 636102