

MEMORANDUM REPORT: PTDP – Hearing G – Response to RFI

To: Timaru District Council

Applicant: Submitter 231 - Blackler

From: Davis Ogilvie (Aoraki) Ltd and Avanzar Consulting Ltd -

Date: 20 February 2025

Subject: Response to Hearing G Preliminary s42A report

1 INTRODUCTION

This memo has been prepared in response to the preliminary s42A report prepared by Mr Matt Bonis and issued in October 2024, and subsequent clarification provided by Council and its representatives in the months since.

In his preliminary report, Mr Bonis identifies the purpose and scope of his report, and acknowledges the need described by Panel Minute 6, for more time for assessment and reporting than usual. In his preliminary report, Mr Bonis provided a checklist (Appendix 1) of the information required and for our client, Blackler, among others, identified additional information as also being required.

In addition to the general requirements, the following additional information was sought:





- a) *The existing environment, including configuration and fragmentation of titles and geophysical boundaries that would delineate the requested zone boundaries.*
- b) *The exact spatial extent of the rezoning sought and anticipated yield*
- c) *Application of the requirements of the NPS-HPL*
- d) *Application of requirements in the NPS-UD especially in terms of development capacity beyond 'at least sufficient development capacity' for the purpose of Policy 2, and implications for integrated infrastructure and funding decisions (Objective 6).*
- e) *Consideration against the relevant statutory framework for achieving a consolidated pattern of development (as required by the CRPS and notified PDP) for all submissions listed, which includes the provision of a 'coordinated pattern of development' including implications for amending timeframes associated with SCHED-15*
- f) *Service provision as set out in Attachment B.*

2 BACKGROUND

Our client's submission seeks that 10 Burke Street (Figure 1) is rezoned to a combination of General Rural (or OSZ) and General Residential Zone (GRZ) in accordance with a conceptual layout showing aged residential care and gardens. The current relevant overlays are also included in Figure 1.



Figure 1: The subject site as shown in the Proposed Plan showing relevant planning overlays.

Description	Overlay
Entire site	DWPA – for Community Drinking Water Supply
	Esplanade Provision: Pleasant Point Stream
	Versatile Soils
Entire site	Flood Assessment Area
Entire site	Liquefaction Area
	Public Access Provision
	Wai Taoka Lines: SASM-16 Ophi River and tributaries

Our client has considered the proposed future design for development of the site in more detail, since their submission was first submitted to Council at notification stage. An updated concept plan for the site is attached as Appendix 2 and shown in Figure 2 below.

The concept plan shows a development that comprises 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. The applicant is currently preparing a resource consent application for this style of residential development on the site.



Figure 2: Concept Plan

Our client seeks rezoning of the site to allow for this form of development. Our client would be open to the consideration of a partial 'site specific' zoning format, an outline development plan approach or other appropriate approach, should greater control be required beyond a standard change of zone approach, particularly regarding site layout and approximate building locations.

The subject site is located within the township of Pleasant Point, a growing community of 1428 as recorded by the most recent 2023 census. The town has two Primary Schools, with approximately 340 pupils.

Figure 3 below, from the Timaru Proposed District Plan planning map, clearly shows that the subject site (10 Burke Street) is sandwiched between two existing residentially zoned land holdings. The site extends to the north, with a portion of the subject site located to the north of the stream shown on the planning map, however the submitter does not propose any residential development beyond the stream. It is worth pointing out at this juncture, that the residential zone boundary in the vicinity of the site, follows the path of the waterway that extends through the site from west to east.

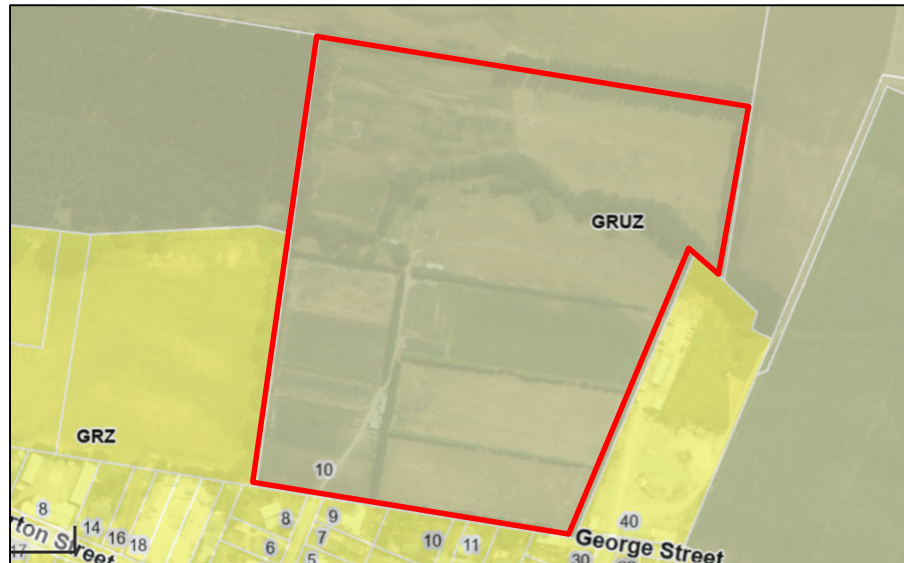


Figure 3: Subject site indicated in red (Source: Proposed Timaru District Plan)

The site is located on the northeastern side of the township, with land on both the east and west already zoned for residential purposes as seen in the planning map above. Consent for residential development is in Council for the establishment of 27 dwellings at 16 Horton Street, directly adjacent to the western boundary of the site. Pleasant Point is characterised by predominantly single family dwellings on residential sites that comfortably have space for mature landscaping and an open space urban character.

3 RESPONSE

This memo provides a brief response to the relevant questions posed in the preliminary s42A report. Distinctly separate responses are not provided to each question posed in the checklist and supplementary questions, to avoid repetition.

NPS-UD

Question 1: *What is the contribution of the rezoning (or amendment in timing associated with SCHED-15 (FDAs)) in terms of the provision (residential / rural lifestyle – yield, density; and business - area) in relation to the Council's provision of 'at least' sufficient development capacity (**Policy 2**) given the Property Economics analysis (**Section 8**)?*

The submitter seeks to establish an aged care and retirement village facility at the site. While the underlying zoning is Rural 1 and Rural 2, the submitter has requested to change the proposed General Rural Zone to General Residential Zone through this plan review process, in order to accommodate the development of their proposal on the site. As discussed above, some form of hybrid zone, or use of outline development plan or partially site specific rules may be appropriate.

The Timaru District Council appears to have relied heavily on the Property Economics Report to justify the extent of rezoning required through this plan change process. It is our opinion that this reliance is flawed, and

that a wider assessment of both existing capacity, and how that capacity might meet the needs of the population is required.

The 'Property Economics' report examines the development capacity of existing and identified land for future general residential development within the district. In doing this, it has considered existing site sizes, proposed densities, and applied a series of parameters to allow them to draw conclusions to allow for sufficient development capacity in the district for the prescribed timeframes. In regards to NPS-UD please also refer to the attached brief planning advice memo prepared by Novo Group, attached as **Appendix 5**. In addition to the Novo Group memo matters considered particularly relevant to this site are discussed below.

The submitter in this case, seeks to rezone the site to allow for a specific style of residential development, which is aimed to address the current failure of the district to provide suitable accommodation to allow the elderly to 'age in place' within their own communities. The submitter is aware of growing community need for retirement options in rural communities, and recognises that not all residents would wish to move to the larger centres of Timaru and Geraldine as they age.

The Property Economics report does not address the needs of the elderly in particular. In New Zealand, there is an increasing recognition that it is important for the aged population to have the opportunity to age in place. This can include elderly being able to remain in their own homes with additional services available or being able to move into custom built homes or communities with care on site.

In recent years, the New Zealand Government produced a strategy entitled 'The Better Later Life – He Oranga Kaumātua 2019 – 2034'. It recognises the particular issues that older people face in accessing suitable housing and seeks to address these issues. The Council must consider these issues and apply them when considering sufficient development capacity. This is because having sufficient development capacity is completely unhelpful if it is not located in places where people want to live, and doesn't provide the level of amenity that people want to live in. If locations and typologies don't inspire the community, then they won't be taken up as actual development, and house prices inevitably increase through a lack of housing choice.

It is important to recognise that senior citizens remain valuable members of their communities as they age, many with deep personal connections to the immediate communities in which they live. Senior citizens are often highly involved in community activities and take on responsibilities that other younger generations do not necessarily have time for, particularly within community activities such as sports, clubs and groups. They add economic value to communities by spending their money locally, and their community involvement is a real asset to the wider community. Given this, it is imperative to ensure that opportunities for ageing in place are provided in small rural communities. If this provision is not made, the lack of opportunity results in loss of population, as older people are forced to leave their communities. Loss of population has a detrimental effect on the social fabric of a small rural community, and also has a significant economic impact on local businesses and services.

Despite this clear and acknowledged need, the Property Economics assessment takes an approach that does not focus on the needs of the community. Instead, it focuses on residential development area or space (size of residential dwelling based on typology) as its main determinant of capacity. This focus is therefore predominantly on the physical capacity of development potential for an area. This approach allows for a technically accurate quantification of available 'space', but does not address the needs of the community, and

because of this, does not reflect the 'actual' level of development capacity that is available. Furthermore, taking this approach in isolation, and the failure of the relevant reports to consider and investigate the actual social demand and requirement for different styles of residential development, and indeed where that development capacity should be located, is a significant flaw in the assessment, and must be addressed in a substantive way, rather than paying lip service to the issue.

In essence, what the Council's reliance on empirical data does not address, are the aspirations, wants and needs of the community. The empirical data approach does not address each individual rural township or each community's aspirations for all members of their community, and the approach appears to contain some flaws that have the potential to skew the outcomes.

In conclusion, while the analysis supplied by the Council considers some of the appropriate factors in quantifying 'sufficient development capacity, it overlooks the provision of sufficient development capacity to cater to the needs of this demographic (and others). Rezoning of this site would provide for the needs of aged residential development in the Pleasant Point community and would assist in the retention of population, have significant social and cultural benefits for the community, and would provide sufficient capacity for the older population of the immediate area, to enable them to age in place.

Question 2: *For residential and business rezonings how would the rezoning (or amendment in timing associated with SCHED-15 (FDAs)) contribute to 'well-functioning urban environments' (**Objective 1** and **Policy 1**) and align with responsibilities of the Timaru District Council to ensure decisions on urban development that affect urban environments are integrated with infrastructure planning and funding decisions (**Objective 6**)?*

The proposed residential rezoning of the subject site for the purposes of retirement housing will contribute to a well-functioning urban environment by:

- Enabling the provision of dedicated residential care services for the aged within an area where this is currently unavailable;
- Providing residential development within an existing residential neighbourhood, resulting in the development resembling a density relatively similar to that of the existing surrounding urban area, with high levels of amenity, open space and landscaped areas;
- Providing Pleasant Point residents with an option to have supported ageing facilities within their local community.
- By continuing residential development so that it aligns to the boundary enjoyed by the blocks either side of the subject site – that is the stream that passes west – east through the site.
- The rezoning would allow for connectivity with the surrounding residential neighbourhoods.

The proposed rezoning will align with the responsibilities of the Timaru District Council to ensure future urban development that is integrated with infrastructure planning. The attached infrastructure servicing assessment prepared by Davis Ogilvie confirms that servicing can be achieved for the site in a cost-effective manner, and that engineering solutions are available to mitigate against any issues.

NPS-HPL

Question 3: Urban Rezoning: *Demonstrate consideration and alignment with the requirements of the NPS-HPL Clause 3.6. for any submission for an urban rezoning (GRZ or GIZ) where the exemptions in 3.5(7)(b) are not applicable.*

The applicant has obtained assessment from the experts on highly productive land at 'The Agribusiness Group' and their assessment is attached in Appendix 3 to this memo.

Clause 3.6 of the NPS-HPL requires that:

- (4) *Territorial authorities that are not Tier 1 or 2 may allow urban rezoning of highly productive land only if:*
 - (a) *the urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district; and*
 - (b) *there are no other reasonably practicable and feasible options for providing the required development capacity; and*
 - (c) *the environmental, social, cultural and economic benefits of rezoning outweigh the environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.*
- (5) *Territorial authorities must take measures to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment.*

Notably, clause 4(c) requires that 'the environmental, social, cultural and economic benefits of rezoning outweigh the long term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.'

The 'National Policy Statement for Highly Productive Land - Guide to Implementation' (Ministry for the Environment, 2023), expands on the requirements of the assessment defined in clause 4(c). The guide also defines the meaning of intangible values as including:

- *Its value to future generations*
- *Its future characteristics and limited supply*
- *Its ability to support community resilience*
- *The limited ability of other land to produce certain products*

As noted by the Agribusiness Group, the site contains soils classified as Category 2 (2ha) and Category 3 (9ha) productive land (see Figure 4 below).



Figure 4: Extract from The Agribusiness Group report showing the LUC Class of the site, showing the dark green, southwestern portion of the site classified as LUC Class: 2, and the remainder of the site shown in light green classified as LUC Class: 3.

The applicant proposes, as discussed above, to develop the site in accordance with the proposed development concept below.

The Agribusiness Group, in their assessment, quantifies the costs of utilising the productive land, and considers the potential financial output from an appropriate agricultural use. The Agribusiness Group note that efficient use of the land is constrained by its size and consider that the site would be more useful to a farmer as part of a larger farming entity. Furthermore, they note that even that use is limited in its potential, given its size and the consequent cost involved in productively farming the land.

In carrying out their assessment of the proposal, Agribusiness Group consider and discuss the benefits of the proposed zoning and the cost of the loss of highly productive land. It is worth noting that while the NPS-HPL provides for a fairly stringent 'avoid' approach for rural lifestyle zoning on highly productive land, it allows for a more enabling 'restrict' approach to urban rezoning situations. This is due to the recognised need for highly productive land to be used in some circumstances to provide sufficient development capacity for housing (and business land) while also ensuring assessment of the alternatives. This concept is particularly applicable for the subject site's situation.

This aspect of the NPS HPL also recognises the fact that urban rezoning typically has significantly greater benefits than rural lifestyle zoning in terms of efficient land use, as it allows for more intensive development and therefore uses less land per housing unit.

As noted by Mr. Bonis in his s42A preliminary report, an assessment of the pathway tests in Clause 3.6 of the NPS-HPL is therefore required.

Clause 3.6 of the NPS-HPL enables a territorial authority to provide for sufficient development capacity to meet demand for housing, and then to consider other matters. The NPS-HPL contains differing requirements for the various 'tiers' of territorial authority. Within the Timaru District, being a tier 3 territorial authority, a pathway for rezoning is found under Clause 3.6(4).

Clause 3.6(4) allows rezoning of highly productive land where:

- *It is required to provide sufficient capacity to meet demand for housing and business land.*
- *There are no other reasonably practicable and feasible options for providing the required development capacity.*
- *A robust assessment of benefits and costs is undertaken that demonstrates the benefits of the rezoning outweigh the costs associated with the loss of HPL.*

In terms of this submission, and in addition to the responses already included above, relating to sufficient capacity, given the site's unique situation within Pleasant Point, and in addition to The Agribusiness Group's assessment, it is worth considering the costs and benefits anticipated in more detail.

Environmental costs and benefits

The environmental benefits of the proposed rezoning are wide and varied. At present, the land is rural and is planted in pasture, with an unfenced stream extending through the site in a west-east direction.

As part of the rezoning request, the applicant intends to establish a rest home / retirement village / aged living development, complete with high quality landscaping. The development will include provision for the improvement of the waterway margins, with care taken to ensure that weeds are managed and planting will occur along riparian margins in such a way that native and introduced fauna will reestablish and thrive. Furthermore, landscaping of the site in conjunction with urban use of the site will allow for additional movement of land fauna across the site, (effectively an urban ecological corridor), instead of remaining an open field 'monoculture', in which both land and air based fauna are less likely to cross.

This habitat development that will result from the proposed urban rezoning and eventual development represents a significant environmental benefit. The rezoning will also have positive environmental effects on neighbouring properties. With the exception of construction periods, the removal of farming practices that may create noise, dust and disturbance for immediate residential neighbours will assist in ensuring a future urban environment with high amenity for inhabitants of the area.

Economic costs and benefits

This matter has been assessed within the Agribusiness Group's report and is more appropriately addressed within that report. However, the economic effects of the change of use from rural to residential is wide reaching. The retention of senior citizens within the township, and the retention of their economic inputs into the township businesses is positive, as is the potential for family homes once inhabited by local older persons becoming available as housing for younger generations in the township. The Agribusiness Group does acknowledge that a cost in loss of employment in the agricultural sector is possible – and have quantified this

as representing 0.04 FTE's. They have also quantified loss of income over the required 30 year assessment period, and considered the slight reduction in agricultural outputs if the land is lost to agricultural use. In conclusion though, and considering all the economic costs and benefits, it is clear that the benefits of the rezoning outweighs the costs.

Social and cultural costs and benefits

The proposed rezoning would, as discussed above, result in significant social benefits, for a range of parts of the community. Senior citizens would benefit from the opportunity to age within their own community, the younger generations benefit from the provision of housing for seniors, through their ability to continue to be active in the community, and for their patronage of local businesses.

In conclusion, and with regard to clause 3.6(5), it is considered that the proposed rezoning of the subject site meets the requirements of clause 3.6. In our view, it is important to consider that 'sufficient development capacity is not merely an empirical assessment. Instead, a wider view should be taken, and the needs and views of all facets of a community should be considered. If the Council fails to consider the needs of all members of a community in determining capacity, there is a real risk that housing typology, location and style will not attract existing residents to stay, nor encourage new residents to settle in the District.

Question 4: Rural Lifestyle Rezoning: *Demonstrate consideration and alignment with the requirements of the NPS-HPL **Clauses 3.7 and 3.10** for any submission that requests a Rural Lifestyle rezoning (RLZ) where the exemptions in Clause 3.5(7)(b) are not applicable.*

Not applicable

Canterbury Regional Policy Statement

Question 5: Growth Rezoning / Amendments to SCHED-15: *Does the proposal, either individually or in combination with those areas identified in the PDP concentrate and promote a coordinated pattern of development (referencing capacity provided in **Section 8** of this report).*

The zoning of the subject site will provide a sensible addition to the existing residential development within the northern Pleasant Point area. The proposed development of the site for coordinated and comprehensive residential purposes will allow for concentrated residential development that is similar to that of the surrounding residential area, while also being sympathetic to the rural land uses north of the site.

Ensuring sufficient capacity of retirement living and aged care facilities to support the increasing ageing population does not appear to be considered within the Property Economic Report. Rezoning the site to residential land use will allow appropriately located development to occur, designed for a specific aged demographic within the district. The proposed rezoning will promote a coordinated pattern of development, which remains concentrated in Pleasant Point, and in essence, given the site's location with zoned residential land on three of its four sides, the addition will represent a sensible and pragmatic extension of the zone boundary.

Question 6: Energy efficiency: *Does the proposal assist in maintaining an urban form that shortens trip distances.*

Currently the subject site is used for rural purposes and its irregular shape causes an indent in the boundary of urban form. The residential development within the subject site would allow for the logical use of existing roading networks, will not lengthen existing vehicle trips within Pleasant Point.

Providing for aged residential development locally will reduce the amount of vehicle movements to Timaru or Temuka, where the nearest aged residential care facilities are located, and enable all members of the community to age in place should they wish.

Question 7: Natural Hazards: *Is the subject site associated with the submission free from inappropriate risk from a natural hazard event, if not what is the appropriate management response – including avoidance.*

The subject site has the potential to be subject to flood risk given the subject site is traversed by the Pleasant Point Stream. Flood hazard advice had been obtained from Environment Canterbury (and is included in the Engineering Servicing Memorandum included as Appendix 4). This advice indicates that the northern section of the site is prone to flooding in 1 in 500 year events.

This flood assessment has informed the development design of the proposed aged residential development, where buildings are proposed will be located towards the southern end of the site, and will have fixed floor levels exceeding what is required. Locating development at this end of the site will also secure ingress and egress from the site, in the event of a flood.

Given the proposed location of proposed development on the site, and mitigation measured proposed, the development of the site for residential purposes is not considered inappropriate.

Proposed District Plan

Question 8: Proposed District Plan: *Does the urban growth / rural lifestyle development (and or sequencing) contribute to a consolidated and integrated settlement pattern, achieve a coordinated pattern of development and is capable of integrating with the efficient use of infrastructure?*

The rezoning of the subject site for residential purposes (aged residential living), will provide for a consolidated and coordinated urban form. The subject site is currently used for passive rural purposes on the direct fringe of the Pleasant Point township. This rural land causes a gap in the urban form. The density of development proposed is not dissimilar to traditional residential development, therefore, residential development in this area is not considered inappropriate, or out of character for the surrounding area.

Given the location directly adjacent to an established residential area on 3 of 4 sides, connection to potable and wastewater infrastructure will not be complicated. The proposal will also integrate efficiently with the existing road network. The Engineering Servicing Memorandum (Appendix 4), prepared by DO, covers matters of infrastructure servicing in more detail. In terms of coordination of development within the wider township, it is considered that the early development of the subject site is logical, and will not preclude other development.

Question 9: Growth Rezoning / Amendments to SCHED-15: *Given the updated residential capacity projections in Attachment A, how does the proposal, either individually or in combination with those areas*

identified in the PDP, concentrate and promote a coordinated pattern of development. How is the rezoning sought (or change in FDA sequencing) required to ensure 'sufficient development capacity'?

The proposed rezoning of the site from rural to residential development will provide for a coordinated when considered within the wider District. The development capacity or social requirement for this type of residential development for elderly people has not been provided for within the growth projections of Attachment A to the s42A preliminary report. The site area required to develop a facility of this kind, could be considered greenfield development, however, the maximum density of this site would not be achieved (as assumed for greenfield development in Attachment A) due to:

- Exclusion of development from the northern portion of the site
- Allotments would not be subdivided once units were established on the site
- Development focus on a more low density retirement development, with elements of rural life mirrored in the design (green and open space priorities)

Inclusion of the subject site within the residential zone will allow for sufficient development capacity for aged residents/aged care facility to be realised at a local level. Central government policy guidance has repeatedly reiterated the need for both genuine housing choice, and the provision of opportunity for ageing in place as key issues that face New Zealand. The Timaru District Council must seek to actively address community needs by providing genuine choice when considering 'sufficient development capacity' rather than repeating past failures in policy, by not allowing provision for different forms of living in all communities. A solely quantitative assessment of capacity will not achieve the actual level of capacity required to give housing choice to communities. It is therefore considered that the proposed rezoning is required to meet sufficient development capacity.

Question 10: Growth Rezonings / Amendments to SCHED-15: *Given the Industrial land capacity projections, how does the proposal, either individually or in combination with those areas identified in the PDP, concentrate and promote a coordinated pattern of development. How is the rezoning sought (or change in FDA sequencing) required to ensure 'sufficient development capacity'?*

Not applicable

Infrastructure and integration with land use

Question 11: Service Provision: *Identify (in conjunction with the requirements of Attachment B) how the future servicing needs of the area and the provision of adequate, coordinated and integrated infrastructure to serve those needs, including how using water sensitive design to manage stormwater will be undertaken.*

The site will be able to connect to the existing Pleasant Point Urban Drinking Water Supply Scheme. The Engineering Servicing Memorandum (Appendix 4), prepared by DO, covers this in more detail. On-site storage tanks may be included in the design to further support the supply. The site is located northeast of the township, and is connected to the township by Burke Street, Frederick Street, and George Street (subject to approval). Residential sites along these streets are currently connected to the reticulated water network, therefore, physically connecting to the network is considered simple. It is noted, however, that capacity within the system would require confirmation once final site design has been determined. Wetland areas and

planting of riparian margins will utilise water sensitive design features to manage stormwater quantity and quality.

Where consent is identified as required from Environment Canterbury and the Land and Water Regional Plan, this will be obtained prior to development on the site.

Question 12: Infrastructure integration: *Identify whether the rezoning if not required for ‘sufficient development capacity’ would result in wider issues for the district in terms of integration with infrastructure planning and funding decisions, or where for Rural Lifestyle Rezoning has consequences for overall yield / density and servicing requirements.*

The site is not identified as a future development area, however, is not considered to have wider issues for the District in terms of integration with infrastructure planning or funding decisions. Development of the site for residential purposes represents a sensible option, as the land is already adjacent to existing established infrastructure. The location of the proposed residential development is appropriate, and the site can successfully be integration with the existing infrastructure systems.

Question 13: Hazards: *Demonstrate with reference to suitable standards, the avoidance and / or management of inappropriate natural hazard risk, and suitable geotechnical conditions.*

As discussed in Question 7 above, the proposed site is subject to flood hazard overlays. An Engineering Servicing Memorandum (Appendix 4) has been provided which addresses flooding and a flood assessment.

Furthermore, an initial geotechnical analysis by Davis Ogilvie & Partners has been undertaken on the site, including site testing. This geotechnical assessment concludes that the site is appropriate for development from a geotechnical perspective. The report can be made available on request, however from the executive summary it is concluded that:

The most significant natural hazard affecting the site is from flooding associated with upstream breakouts from the Te Ana A Wai River. Environment Canterbury (ECan) has carried out a flood hazard assessment for the site and provided areas suitable for development (where flooding in the order of 300 – 550 mm is expected) and areas unsuitable for development (“high hazard flood”). To meet flood management Finished Floor Level (FFL) requirements, site-wide engineered filling will need to be carried out. The implication of filling may result in floodwater displacement; therefore, this will require careful consideration for the development of the final scheme plan and availability of land to be used for stormwater attenuation.

It is considered that the lower risks from other natural hazards can be sufficiently managed through appropriate infrastructure and structural design, provided the recommendations provided in this report are followed. It is therefore considered that the site is suitable for the proposed rezoning and residential development, subject to the following geotechnical conditions:

- *Site-specific geotechnical investigations are carried out at building consent stage.*
- *FFLs are confirmed during the consenting process by Timaru District Council (TDC) and / or ECan.*

Transport

Question 14: Transport network integration: *Demonstrate with reference to suitable standards and the potential yield / density of development – the safe and efficient functioning of the supporting transport network, ability to facilitate modal choice, and consolidating an accessible urban form.*

The Engineering Servicing Memorandum addresses anticipated traffic generation and the ability of the surrounding network to accommodate the land use. It is considered that the site can be developed in accordance with the best practice traffic design and safety principles and will have no detrimental effects on the existing traffic environment.

Environmental values

Question 15: Existing Environment and characteristics: *Identify the following as relevant to the submission:*

- (a) The existing lawfully established land use(s) as they relate to the area that is subject to the submission, including: density (and existing fragmentation of sites), amenity and character, and range of uses.*
- (b) Geophysical boundaries that would distinguish zone boundaries, including how the proposal would result in the contiguity of existing urban areas (proximity and agglomeration of existing urban areas).*
- (c) Existing resource consents that provide for established land uses, including alignment with the anticipated outcomes associated with the submission.*

The subject site is currently used for traditional rural activities (pasture). The site is comprised of regular shaped oblong paddocks, fenced by shelter belts. The site is visually rural and open in nature. There are some rural farm sheds and storage established on site.

The proposed rezoning will align residential use with the boundary of the Pleasant Point Stream, with the southern portion of the site sought to be rezoned General Residential and the northern portion of the site (separated by the stream) remaining more rural in character. The stream provides a clear and distinct geophysical boundary for the proposal and represents a sensitive limit for the residential use which would ensure that the urban form is linear and logical and configures with adjoining land to the west and east. Indeed, the proposed planning map, included earlier in this memo, shows clearly the current incongruous zone boundary, which would be rectified if this proposed rezoning proceeds.

No prior land use would preclude or influence the proposed rezoning and change in land use.

Question 16: Environmental Values: *Where the site incorporates or adjoins any of the following as notated within the PDP:*

- (a) Specific values associated with Landscape values and natural character.*
- (b) Biodiversity constraints.*
- (c) Cultural and / or Heritage values.*
- (d) Existing or permitted Intensive Farming Activities, Rural Industry or other established Rural that could generate incompatible land uses with the submission outcome.*

The subject site is not located within an area of natural significance, biodiversity overlay, or is identified for cultural or built heritage.

The subject site is intersected by the Pleasant Point Stream, which is subject to esplanade and public access provisions. There are no biodiversity, landscape, cultural, or heritage values that constrain the site, nor are there any incompatible use matters that would arise as a result of the rezoning.

Submitters shall provide information as to whether any additional standards, rules or methods (other than those already contained within the respective zone standards) are required to maintain or enhance any specific attribute, value or effects. This shall include where specific features or attributes should be retained through subsequent subdivision, use or development.

No specific additional standards, rules, or methods have been considered as part of this additional memo, however, it is acknowledged that it may be appropriate to generate site specific rules and methods such as the provision of an outline development plan to ensure that future development proceeds in a prescribed manner, providing certainty for both Council and the community.

Specific matters

Question 17: Submitters shall provide information and analysis on the specific matters identified, noting that these may well overlap with Questions 1 – 16 above.

All of the relevant specific matters and information requirements have been included in earlier sections of this report memo.

4 CONCLUSION

Overall, the Submitter proposed to rezone the southern portion of the site, south of the Pleasant point stream, from Rural to General Residential under the Proposed Timaru District Plan. The site is located within an established residential area, with deemed adequate access to infrastructure connections. Additional information has been provided regarding the NPS-HPL, as well as Engineering support with regard to natural hazards, transport, and infrastructure. The submitter intends to establish an aged residential care facility within the residential zone, to provide an alternative residential option for a specific demographic within the district.

Disclaimer: The above is intended to provide the preliminary s.42A author with some further information in regards to the suitability of the site for development. The submitter retains their right to provide further information in response to the s42A report and is not bound by the information provided to date.

5 ATTACHMENTS

- Appendix 1 – Table 1 Checklist for Submitters
- Appendix 2 – Conceptual Development Area Plan
- Appendix 3 – Highly Productive Land Assessment
- Appendix 4 – Engineering Service Memorandum
- Appendix 5 – Novo Group – Planning advice on NPS-UD

APPENDIX 1

Table 1 Checklist for Submitters

Table 1: Checklist for Submitters

Consideration	Question (Sections 7 – 11)		Check
<i>'Give effect to'</i> NPS-UD (Section 7)	Question 1:	What is the contribution of the rezoning (or amendment in timing associated with SCHED-15 (FDAs)) in terms of the provision (residential / rural lifestyle – yield, density; and business- area) in relation to the Council's provision of 'at least' sufficient development capacity (Policy 2) given the Property Economics analysis (Section 8)?	<input type="checkbox"/>
	Question 2:	For residential and business rezonings how would the rezoning (or amendment in timing associated with SCHED-15 (FDAs)) contribute to 'well-functioning urban environments' (Objective 1 and Policy 1) and align with responsibilities of the Timaru District Council to ensure decisions on urban development that affect urban environments are integrated with infrastructure planning and funding decisions (Objective 6)?	<input type="checkbox"/>
<i>'Give effect to'</i> NPS-HPL (Section 7)	Question 3:	Urban Rezonings: Demonstrate consideration and alignment with the requirements of the NPS-HPL Clause 3.6. for any submission for an urban rezoning (GRZ or GIZ) where the exemptions in 3.5(7)(b) are not applicable.	<input type="checkbox"/>
	Question 4:	Rural Lifestyle Rezonings: Demonstrate consideration and alignment with the requirements of the NPS-HPL Clauses 3.7 and 3.10 for any submission that requests a Rural Lifestyle rezoning (RLZ) where the exemptions in Clause 3.5(7)(b) are not applicable.	<input type="checkbox"/>
<i>'Give effect to'</i> Canterbury Regional Policy Statement (Section 7)	Question 5:	Growth Rezonings / Amendments to SCHED-15: Does the proposal, either individually or in combination with those areas identified in the PDP concentrate and promote a coordinated pattern of development (referencing capacity provided in Section 8 of this report).	<input type="checkbox"/>
	Question 6:	Energy efficiency: Does the proposal assist in maintaining an urban form that shortens trip distances.	<input type="checkbox"/>
	Question 7:	Natural Hazards: Is the subject site associated with the submission free from inappropriate risk from a natural hazard event, if not what is the appropriate management response – including avoidance.	<input type="checkbox"/>
<i>'achieve and implement'</i> Proposed District Plan (Section 7)	Question 8:	Proposed District Plan: Does the urban growth / rural lifestyle development (and or sequencing) contribute to a consolidated and integrated settlement pattern, achieve a coordinated pattern of development and is capable of integrating with the efficient use of infrastructure?	<input type="checkbox"/>
For Residential / Rural Lifestyle submitters (Section 8)	Question 9:	Growth Rezonings / Amendments to SCHED-15: Given the updated residential capacity projections in Attachment A , how does the proposal, either individually or in combination with those areas identified in the PDP, concentrate and promote a coordinated pattern of development. How is the rezoning sought (or change in FDA sequencing) required to ensure 'sufficient development capacity'?	<input type="checkbox"/>
For General Industrial Zone (Section 8)	Question 10:	Growth Rezonings / Amendments to SCHED-15: Given the Industrial land capacity projections, how does the proposal, either individually or in combination with those areas identified in the PDP, concentrate and promote a coordinated pattern of development. How is the rezoning sought (or change in FDA sequencing) required to ensure 'sufficient development capacity'?	<input type="checkbox"/>
Infrastructure and integration with Land use	Question 11:	Service Provision: Identify (in conjunction with the requirements of Attachment B) how the future servicing needs of the area and the provision of adequate, coordinated and integrated infrastructure to serve those needs,	<input type="checkbox"/>

(Section 9)		including how using water sensitive design to manage stormwater will be undertaken.	
	Question 12:	Infrastructure integration: Identify whether the rezoning if not required for 'sufficient development capacity' would result in wider issues for the district in terms of integration with infrastructure planning and funding decisions, or where for Rural Lifestyle Rezoning has consequences for overall yield / density and servicing requirements.	<input type="checkbox"/>
	Question 13:	Hazards: Demonstrate with reference to suitable standards, the avoidance and / or management of inappropriate natural hazard risk, and suitable geotechnical conditions.	<input type="checkbox"/>
Transport (Section 9)	Question 14:	Transport network integration: Demonstrate with reference to suitable standards and the potential yield / density of development – the safe and efficient functioning of the supporting transport network, ability to facilitate modal choice, and consolidating an accessible urban form.	<input type="checkbox"/>
Environmental Values (Section 10)	Question 15:	<p>Existing Environment and characteristics: Identify the following as relevant to the submission:</p> <p>(a) The existing lawfully established land use(s) as they relate to the area that is subject to the submission, including: density (and existing fragmentation of sites), amenity and character, and range of uses.</p> <p>(b) Geophysical boundaries that would distinguish zone boundaries, including how the proposal would result in the contiguity of existing urban areas (proximity and agglomeration of existing urban areas).</p> <p>(c) Existing resource consents that provide for established land uses, including alignment with the anticipated outcomes associated with the submission.</p>	<input type="checkbox"/>
	Question 16:	<p>Environmental Values: Where the site incorporates or adjoins any of the following as notated within the PDP:</p> <p>(a) Specific values associated with Landscape values and natural character.</p> <p>(b) Biodiversity constraints.</p> <p>(c) Cultural and / or Heritage values.</p> <p>(d) Existing or permitted Intensive Farming Activities, Rural Industry or other established Rural that could generate incompatible land uses with the submission outcome.</p> <p>Submitters shall provide information as to whether any additional standards, rules or methods (other than those already contained within the respective zone standards) are required to maintain or enhance any specific attribute, value or effects. This shall include where specific features or attributes should be retained through subsequent subdivision, use or development.</p>	<input type="checkbox"/>
Specific Matters (Section 11)	Question 17:	Submitters shall provide information and analysis on the specific matters identified, noting that these may well overlap with Questions 1 – 16 above.	<input type="checkbox"/>

APPENDIX 2

Conceptual Development Area Plan



CAD ref: C:\12d5\data\DO-TIMARU\30661.TM - 10 Burke Street, Pleasant Point, 1110\06 CAD Draw\DO-TIMARU\30661-Development Plan Revised 250211 A3.dwg

APPENDIX 3

Highly Productive Land Assessment

Assessment of land owned by Glenhays Investments Limited at 10 Burke Street, Pleasant Point for its potential to be rezoned by meeting the requirements of Clause 3.6 of the NPS-HPL.

1 Background

The AgriBusiness Group (TAG) has been asked to make an assessment on the impact of Section 3.6 (4)(c) of the National Policy Statement on Highly Productive Land (NPS-HPL) in terms of the sites suitability for rezoning as part of Timaru District Plan review process of the property at 10 Burke Street which is owned by Glenhays Investments Limited

This analysis is under the National Policy Statement on Highly Productive Land (NPS-HPL) under Clause 3.6 Restricting urban rezoning of highly productive land. Under sub clause 4(c) this requires that “ *the environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.*”

In the guide to implementation¹ it states that “*Clause 3.6(4)(c) requires an assessment of the benefits and costs of rezoning. It is intended to ensure a more robust assessment of benefits and costs across the four wellbeings (environment, economic, social, cultural) is undertaken for all urban rezoning proposals on HPL and that this specifically considers long-term benefits and costs and tangible and intangible values.*” And that “*Intangible values of HPL that should be considered as part of this assessment include:*

- *its value to future generations*
- *its finite characteristics and limited supply*
- *its ability to support community resilience*
- *the limited ability of other land to produce certain products.*”

This requires that the site should be evaluated to provide the full range of benefits of the proposed rezoned land (PRL) that can be weighed up against the full range of costs of the loss of HPL.

The range of both tangible and non tangible costs and benefits that have been used in this assessment have been taken from the Cost Benefit Analysis² carried out on the NPS-HPL. They are as displayed in Table 1.

I am of the opinion that I have the expertise to carry out a qualitative assessment of the benefits of the proposed rezoning as well as the costs of the loss of HPL land. In doing so I have drawn on my

¹ MFE (2023): National Policy Statement for Highly Productive Land: Guide to implementation.

² Market Economics (2020): National Policy Statement – Highly Productive Land. Cost-Benefit Analysis

professional experience, that of my colleagues who are environmental consultants and of the developer.

Table 1: Costs and Benefits both tangible and non tangible assessed in this exercise.

Category
Environmental
Carbon sequestration
Support habitat
Water filtration
Flood mitigation
Nutrient
Climate regulation
Air and water quality
Biodiversity conservation
Social / Cultural
Sense of belonging and place
Social fabric
Food security
Spiritual value
Economic
Income
Employment
Flow on impacts to the wider community

2 Description of the Site

As can be seen from Figure 1 the site is on the northern boundary of Pleasant Point township. The site is approximately 11 ha and is located at the end of Burke Street. To the North of the site is some pastoral land followed by the Opihi River. To the East of the site is pastoral farmland. To the West of the site is a small amount of pastoral land, and some small-scale lifestyle blocks on the outskirts of Pleasant Point.

The site has a current take and use consent and well for irrigation purposes.



Figure 1: The site (depicted in red) and its surrounding land uses

2.1 Land Use Capability

The data which is available on Land Use Classification (LUC) in the New Zealand Land Resources Inventory Series (LRIS) portal³ is mapped at the 1:50,000 level and it is shown in Figure 2. What we can determine from Figure 2 is that the site has 2 ha of LUC 2 and 9 ha of LUC 3.

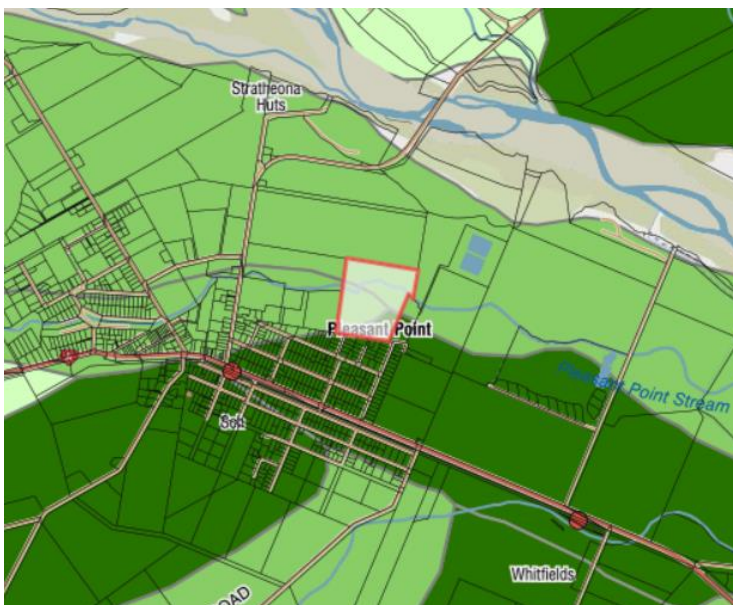


Figure 2: LUC Class of the Site (Dark Green LUC2 & Lighter Green LUC 3)

In the NPS-HPL all land which is classified as LUC 1,2 and 3 and which is zoned as Rural is automatically considered to be HPL.

³ https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Capability/Iri_luc_hpl

3 Productive Capacity as HPL

The productivity of the site is determined by a number of factors including the nature of the soils, the climate and the scale of the operation.

3.1 Soils

In Figure 3 have included a screen shot of the data held in Manaaki Whenua Landcare Research's SMap online portal of the soils of New Zealand⁴ of the site.

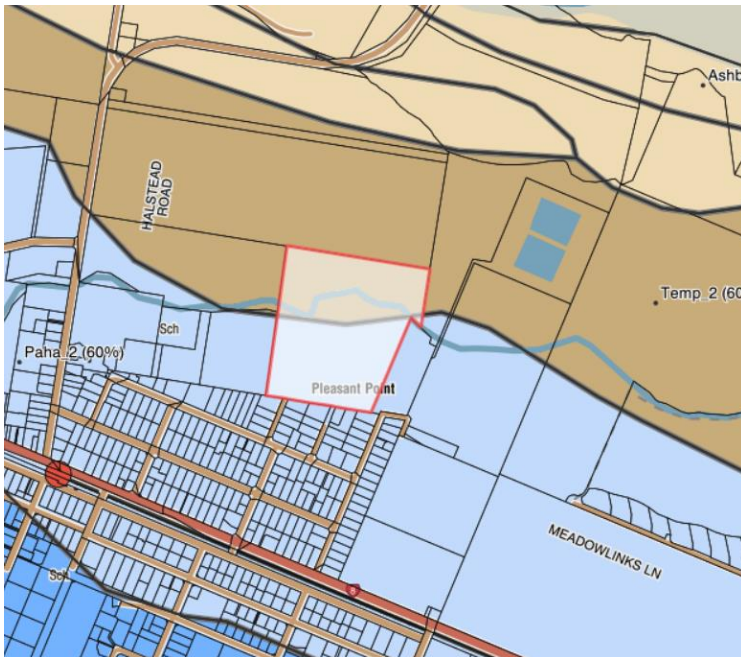


Figure 3: SMap Record of Soils on Site (Smap)

Table 2 lists the soils on the site by sibling description, area and proportion.

Table 2: Soils on the site by sibling description, area and proportion

Soil Name	Area (ha)	Proportion (%)
Paha_2a.1	3	32
Temp_2a.1	3	28
Darn_1a.1	2	21
Eyre_1a.1*	2	19

Eyre_1a.1* includes Eyre_3a.1 and other similar eyre soils.

Definitions of the key soil physical properties that are listed in the SMap fact sheet for the soils that are present on the site are shown in Table 2.

⁴ <https://smap.landcareresearch.co.nz/maps-and-tools/app/>

Table 3: Description of Soils on the Site

Soil Name	Pahau	Templeton	Darnley	Eyre
SMap Name	Paha_2a.1	Temp_2a.1	Darn_1a.1	Eyre_1a.1
Depth Class	Moderately Deep (70-90cm)	Moderately Deep (45-90cm)	Shallow (25-60cm)	Shallow (20-45cm)
Rooting Depth	Unlimited	Unlimited	80-90 (cm)	70-100 (cm)
Depth to Stony Layer	Moderately Deep	Moderately Deep	Shallow	Shallow
Texture Profile	Silt	Silt	Silt	Silt
Topsoil Stoniness	Stoneless	Stoneless	Slightly Stony	Stoneless
Draining Class	Imperfectly Drained	Moderately Well Drained	Moderately Well Drained	Well Drained
Profile Available Water (0-100cm)	Moderate to High (130mm)	Moderate to High (146mm)	Moderate (109mm)	Moderate to High (125mm)

The Pahau soils make up 32% of the site. The Pahau moderately deep silt soils, are stoneless, imperfectly drained and have a moderate to high profile available water (PAW). Templeton soils make up 28% of the site, they are moderately deep silt soils that are stoneless, moderately well drained and have a moderate to high PAW. Darnley soils make up 21% of the site, they are shallow silt soils that are slightly stony, moderately well drained and have a moderate PAW. The Eyre soils make up 19% of the site. The Eyre soils are shallow silt soils that are stoneless to moderately stony, well drained and have a moderate PAW.

These soils are all theoretically suitable for horticulture, vegetable, arable and a wide range of pastoral land uses.

3.2 Constraints on Land Use

There are a number of significant constraints which have a bearing on the highest and best land use possible on the site.

3.2.1 Scale

The scale of the site is a significant constraint because the 11 ha lack any of the scale which is necessary to achieve the economies of scale. This is necessary to achieve commercial viability for any but the most intensive land uses.

3.2.2 Exclusion of Horticulture

The potential for intensive horticultural land use has been considered and it has been rejected for a number of important reasons including:

- The very high cost of establishment of an intensive horticultural operation on a relatively small site.
- The cold winters limit the potential range of horticultural crops.
- The site is remote from any post harvest packaging and processing facilities which would mean that the high costs of transport of produce would add large additional growing costs.
- The potential for reverse sensitivity from neighbours that are situated in a lifestyle area would mean that investors in horticultural activities are most likely to seek alternative production areas where there isn't the threat of reverse sensitivity becoming a production issue.

3.2.3 Exclusion of Arable

The ability to maximize the productivity of any of the potential arable land uses would require that the land was farmed as part of a larger farming entity this is because the area available would negate the ability to carry out a crop rotation for an arable operation. The block of land would have to be incorporated into a bigger growing operation in order to achieve sufficient scale to enable the landowner to maximise productivity. The scale of the site makes this site unattractive to an existing arable farmer to amalgamate into their operation.

3.2.4 Pastoral Land Uses

It would be theoretically possible for the land to be used for pastoral grazing (dairy support and sheep and beef) however there are a number of significant constraints on that land use being achieved. The constraints include:

- The costs associated with intensifying the productivity of the site e.g. providing for winter crops, and providing additional supplementary feed from off site are all too expensive to be justified on a such a small scale.
- The scale of the site being too small to offer a prospective farmer any real advantage in farming the site.

It is my opinion that the site would not be an attractive option for a farmer to take it up to add to other productive land because of its scale.

3.2.5 Conclusion

It is my opinion that the highest and best land use would be irrigated dairy support.

4 Assessment of the benefits of the Proposed Rezoning Land (PRL) and the Cost of the loss of HPL.

4.1 Environmental

My assessment of the benefits of the PRL and the costs of the loss of HPL from an environmental perspective are shown in Table 4.

Table 4: Assessment of the benefits of PRL and the costs of the loss of HPL from an environmental perspective.

Assessment Category	Benefits of PRL	Costs of the loss of HPL
Support habitat	The planting which is proposed will considerably enhance the site's ability to support habitat as well as the individual curtilages of the urban sections which will all have some degree of permanent habitat development.	
Water filtration	Water filtration will be enhanced by the development which will benefit the environment	

by filtering sediment and nutrients before they enter waterways.

Flood mitigation	The provision of the diversion of run off water from the sections into appropriate sized water channels and the wetland which will then run into the designated stormwater management areas which will provide a significant benefit for flood mitigation.	
Nutrient and Greenhouse Gases	The change from rural to urban will have the benefit of the removal of N loss and greenhouse gas emissions that come from livestock on the site and fertilizer applications	
Air and water quality	Water quality will benefit from the proposed urban development by the riparian planting and the diversion of runoff water from the sections.	Air quality will be diminished by the conversion from rural land uses to a retirement village because there will be more urban activity which has the potential to negatively impact on air quality.
Biodiversity conservation	Biodiversity and conservation will benefit from the planting in the structural planting plan and from the plantings that will occur in the curtilages of the sections.	

4.2 Social / Cultural

Our assessment of the benefits of the PRL and the costs of the loss of HPL from a social and cultural perspective are shown in Table 5.

Table 5: Assessment of the benefits of PRL and the costs of the loss of HPL from a social and cultural perspective.

Assessment Category	Benefits of PRL	Costs of the loss of HPL
Sense of belonging and place	There will be an increase in the positive effect of the sense of belonging and place on the site with the conversion from the rural use to that of multiple units which will all have a positive sense of belonging and place.	
Social fabric	The social fabric of the site and the wider Pleasant Point area will be enhanced by the additional population that this site will provide which will provide a wider range of social aspects to the community.	
Food security		There will be a slight reduction in food production in the shift from this site being rural to urban. This reduction will be minute, however, due to the small size of the site.

Social Need	The retirement village serves a social need to look after our elderly. This serves the community of Pleasant Point with the ability for the elderly to stay within the community in a place that is suitable for them.
Spiritual value	As far as we are aware there are no cultural heritage sites on or near the site therefore this category is judged as having no impact on either of the considerations.

4.3 Economics

Our assessment of the benefits of the proposed PRL development and the costs of the loss of HPL from an economic perspective are shown in Table 6.

Table 6: Assessment of the benefits of LLRZ and the costs of the loss of HPL from an economic perspective.

Assessment Category	Benefits of PRL	Costs of the loss of HPL
Income	There will be increased income both from the construction which will occur on the site as well as the ongoing income from the maintenance of the site.	The loss of income over a 30 year period would be \$170,491 (workings are in appendix A)
Employment (FTE)	There will be increased employment both from the construction which will occur on the site as well as the ongoing income from the maintenance of the site.	There will be a loss in employment from the agricultural sector. The loss in employment could in dairy support is comparable to sheep and beef grazing which would have a loss of employment on this site of 0.04 FTE's.
Flow on impacts to the wider community	There will be considerable flow on impacts to the wider community because the proposed development will result in increased expenditure in the local economy.	There will be a decline in inputs being sent to agricultural processors. However, the volume is so small that it is unlikely to affect either the processing companies or their employees significantly.

4.4 Summary

It is my opinion that the environmental, social, cultural and economic benefits of rezoning the site at 10 Burke Street Pleasant Point, outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production and meets the requirements of Clause 3.6 (4) (c) of the NPS-HPL.

5 Appendix A

5.1 Economic

We have assessed the economic cost of the loss of the site from the production off it as the discounted cash flow of the Earnings Before Interest and Tax (EBIT) of the earnings from the site over 30 years which have been discounted at 6% per annum. This calculation represents the value of the loss of EBIT from the land over a 30 year period.

The TAG dairy support financial model has been used. This model has been adjusted with intensive winter grazing being removed as this is not suitable for this site.

Table 7: Dairy Support Economic return

	\$/ha	Total from 11 ha
Gross Revenue	2,901	31,911
Operating Expenses	1,775	19,525
EBIT	1,126	12,386

Therefore, the direct opportunity cost of the loss of income from the site is \$170,491.

5.2 Proposed Site Plan

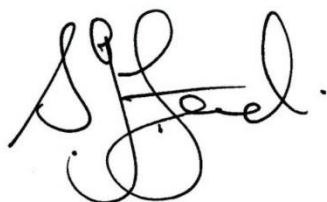
I understand that the proposed use of the site if resource consent was granted would be for urban development as shown in Figure 4. The proposal is for a retirement village with 50 lots. The site would also include a waterway and vegetation.



Figure 4: Proposed use of the site (Concept Plan Only)

Report Written By

Stuart Ford (Agricultural & Resource Economist)

A handwritten signature in black ink, appearing to read 'S. Ford', with a stylized flourish at the end.

APPENDIX 4

Engineering Service Memorandum

MEMORANDUM REPORT

To: Timaru District Council
Applicant: Glenhays Investments Limited
From: Selwyn Chang – Principal Civil Engineer
Date: 18 February 2025
Subject: Infrastructure Servicing Assessment

1 INTRODUCTION

The purpose of this report is to outline the concept infrastructure servicing assessment which are integral to residential development of the proposed site located at 10 Burke Street, Pleasant Point. The land is legally described as Lot 2 DP5504 and shown in Figure 1 identified in the red line. The infrastructure servicing assessment is to assess the feasibility of the area highlight in yellow area which is delineated from Pleasant Point Stream.



Figure 1: Proposed Site

The concept residential development layout as shown in Figure 2 with potential up to 50 residential allotments/dwellings that could be developed for a potential retirement village development.



Figure 2: Concept Residential Development Layout

2 SERVICE PROVISION AND INFRASTRUCTURE INTEGRATION

2.1 Portable Water Supply

There is nearby public water network close by to service the proposed site at Burke Street. An existing DN100 AC-F Council main is located in both Frederick Street and Burke Streets, with a DN100 uPVC main located in George Street. The water network will need to be extended approximately 30m to 50m from the public water network in order to service the site at the boundary as shown in Figure 3.

The extension of the network has sufficient capacity to service the proposed site residential development.

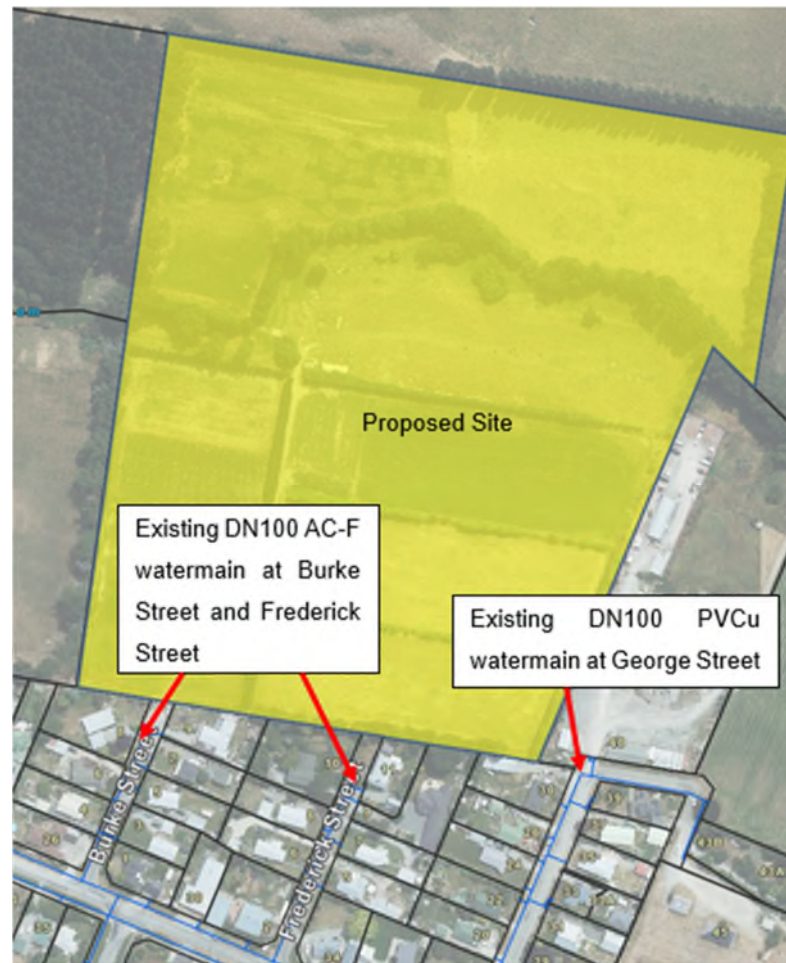


Figure 3: Proposed Potential Water Supply Connection

2.2 Wastewater

There is nearby public wastewater network close by to service the proposed site. An existing DN150 CC-SR both at Burke Street and Frederick Street and DN225 CC-RF at George Street. The wastewater network will need to be extended approximately 30m to 50m in order to service the site as shown in Figure 4.

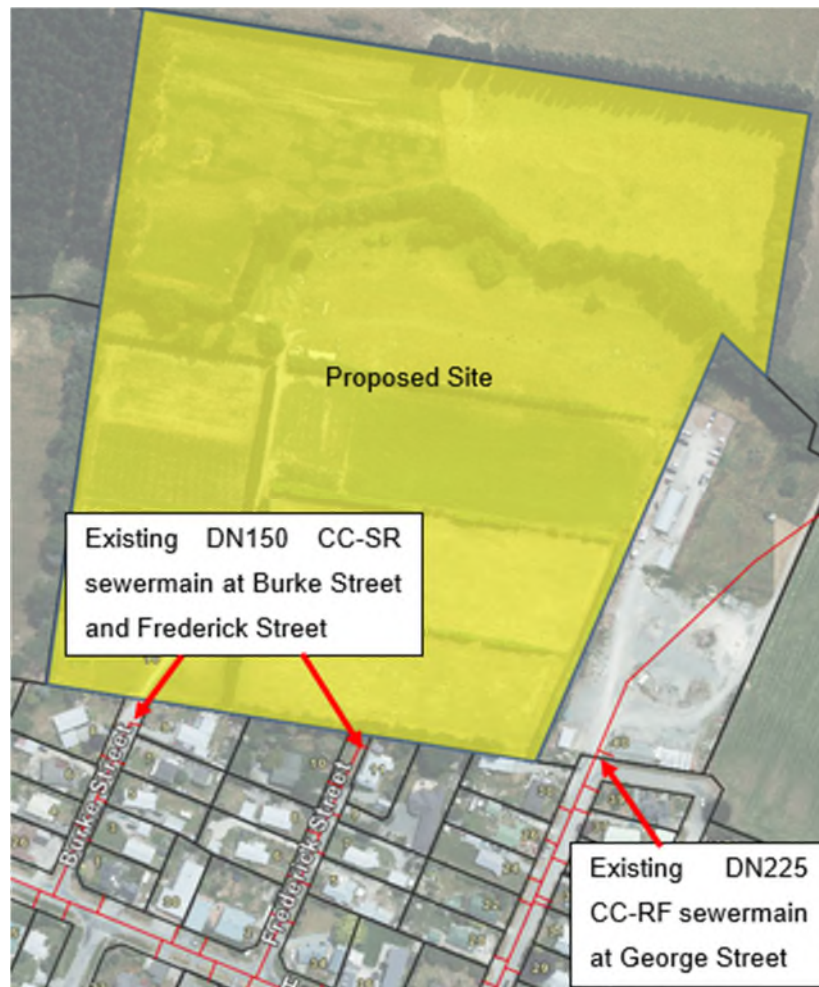


Figure 4: Proposed Potential Wastewater Connection

The existing wastewater network may not have sufficient capacity within the system. Historical wastewater overflow has occurred in Council pump station at George Street. Therefore, a low-pressure network system or a communal wastewater pump station can mitigate to manage the peak flow from the proposed site to minimise or not make it any worse than the current wastewater overflow situation.

2.3 Stormwater

There is no public stormwater network in vicinity to the proposed site. Pleasant Point Stream (ECAN stream) traverses through the proposed site (west to east) and the ground conditions could be suitable to be discharge to ground. It is considered that both discharge options (i.e. discharge to surface water or to ground) could be utilised for an appropriate stormwater management system for the development to manage post-development stormwater runoff. Therefore the proposed site will require stormwater management plan and resource consent to be obtained for the discharge to the ground and/or to ECAN's stream.

2.4 Electricity

Alpine Energy has confirmed the site can be serviced for power.

2.5 Telecommunication

It is anticipated there is no issue to service the proposed site for telecommunications.

3 HAZARD INFORMATION

3.1 Liquefaction Assessment

From TDC Infrastructure Design Standard, Part 4 the liquefaction potential in Timaru District identified the proposed site to be at the zone of very low potential liquefaction. This aligns with Canterbury Map liquefaction desktop assessment (MBIE Level A assessment) confirm liquefaction damage is unlikely.

3.2 Flood Hazard Assessment

Flood Hazard Assessment (FHA) have been carried out by ECAN for 10 Burke Street on 13 May 2022.

The FHA described and identify area of flooding with various flooding expected depth and high hazard flooding area. There are three distinct area (identified as white dashed) of the site is suitable for development subject to determine floor heights of the dwelling as shown in Figure 5. Where areas shown to have deep flooding, development in those area should be avoided.

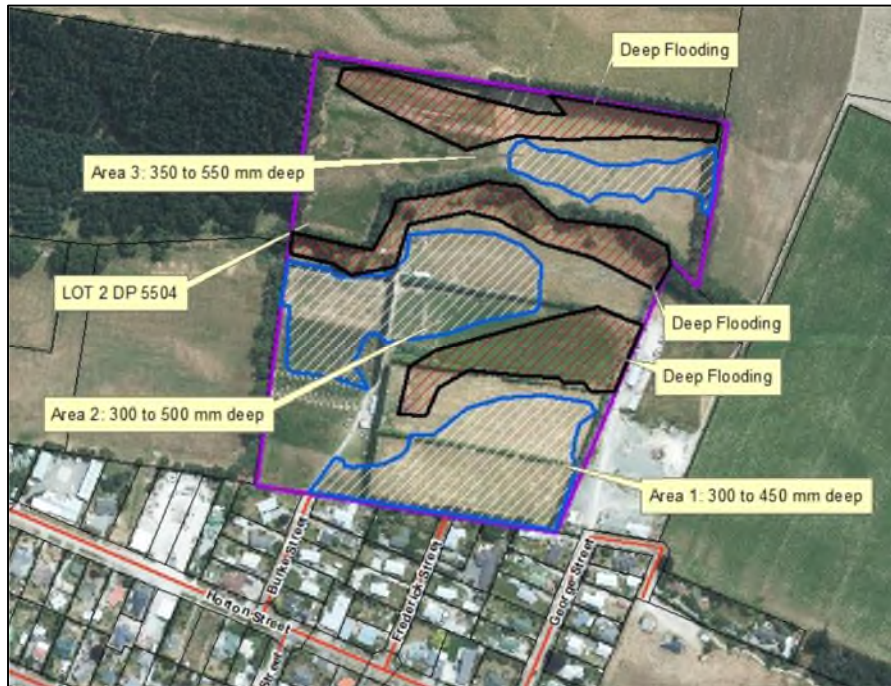


Figure 5: Flood Hazard Assessment Flooding Areas

Determining habitable floor heights, stormwater management from the development, management of overland flowpath and Pleasant Point Stream can contribute to mitigate the floodwater issues and not creating any adverse impact downstream.

4 TRANSPORT NETWORK INTERGRATION

Currently the proposed development will have linkages from Burke Street and potentially George Street, subject to Council approval. Potential pedestrian linkages through Frederick Street.

Carriageway Consulting have carried out Transportation Assessment for the proposed retirement village which sets out an overview of the likely transportation issues associated with the proposed retirement village development. Although it does not cover the potential change to residential use, the traffic generation should not vary that greatly.

The conclusion of the report considered that the traffic generated by the development can be accommodated on the adjacent roading network without capacity or efficiency issue arising. However, Burke Street and George Street have been specifically considered and currently fall below the expected layouts of the District Plan.

Overall, the adverse transportation-related effects that could be generated from the retirement village with similar traffic generation are less than minor.

5 CONCLUSION

There are public services (water and wastewater, electricity, telecommunication and transport) to the proposed residential site that is able to be serviced and integrated. Engineering solutions are practical and applicable to mitigate and address any of the capacity issues. In addition, the site has low hazard risks on both liquefaction and flood hazards and is suitable for residential development.

APPENDIX 5

Novo Group – Planning Advice on NPS-UD

19 February 2025

Davis Ogilvie (Aoraki) Ltd
14 The Terrace
Timaru 7910

Novo Group Limited
Level 1, 279 Montreal Street
PO Box 365, Christchurch 8140
0 - 03 365 5570
info@novogroup.co.nz

Attention: Glen McLachlan

By email: glen@do.nz

Dear Glen,

PLANNING ADVICE CONCERNING THE NPS-UD PROPOSED TIMARU DISTRICT PLAN

1. This memo provides an overview of our interpretation of the National Policy Statement on Urban Development 2020 (NPS-UD) concerning the Timaru Proposed District Plan (PDP) in response to the preliminary s42A report prepared by Matt Bonis.
2. As summarised in the preliminary s42A report, the NPS-UD aims to ensure that sufficient land is available for housing and businesses. Growth is intended to be integrated with infrastructure planning and funding and occur in appropriate locations to support a well-functioning urban environment.
3. Under Policy 2, local authorities are required to provide for expected demand over the short (three years), medium (ten years), and long terms (30 years). While the policy sets a minimum threshold ("sufficient development capacity"), it does not preclude councils from enabling additional capacity where it contributes to a well-functioning urban environment and is integrated with infrastructure planning and funding. In fact, the words "at least" encourage councils to exceed mere sufficiency.
4. Beyond the question of capacity, Policy 1 mandates councils to assess rezoning requests in terms of their contribution to a well-functioning urban environment. A well-functioning urban environment is defined as one that enables a variety of homes that meet the needs of the community in terms of type, price and location among other factors (Policy 1(a)).
5. The economic assessment undertaken by Property Economics has identified a realisable capacity of almost 4,000 dwellings within the existing urban areas and approximately 3,500 dwellings within the Future Development Areas. However, it remains unclear whether these dwellings correspond to the community needs in terms of housing type, price and location.
6. For example, projections indicate an aging population. As a result, demand for smaller residential units and retirement villages rather than standalone homes is expected to increase for a growing segment of the community. At the same time, unlike in large urban centres such as Christchurch, there appears to be ongoing demand among families for properties with standalone houses that exceed the modelled 450m² allotment size.



7. Likewise, in terms of industrial land supply, Policy 1(b) mandates local authorities to provide sufficient land that meets the varying location and site size requirements of different business sectors.
8. In summary, local authorities must ensure at least sufficient capacity to meet demand across various housing types / land size, locations and price points. If evidence was obtained that demonstrates that the PDP does not adequately accommodate these evolving needs, the Council will need to consider alternative approaches to address the shortfall.

Yours sincerely,

Novo Group Limited

Mona Neumann

Planner

M: 021 197 6585 | **O:** 03 365 5570

E: mona@novogroup.co.nz | **W:** www.novogroup.co.nz

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