

Date: 22.12.20

Draft District Plan - He Po. He Ao. Ka Awatea – Feedback from the South

Canterbury Chamber of Commerce

The District Plan is required by the Resource Management Act (RMA) to manage all land use (how we use the land) and subdivision in the District. It contains objectives, policies, rules and standards to address issues and must achieve the RMA's goal of sustainability.

With multiple chapters and hundreds of objectives, policies and rules the Chamber is providing feedback below as received from our members and also in broad general terms.

It is understood that the Council sees the process and relationships as important as the outcomes, in line with this sentiment we would like to thank Mark Geddes and Alex Wakefield TDC Planning Managers for their presentation to Chamber members and the opportunity for engagement to occur.

It is understood that Council's strategic directions include:

- Consolidate & integrated settlement pattern
- Sufficient zoned land
- City/town centres focal point
- Protect natural values & heritage
- Climate change addressed
- Maori values addressed
- Avoid development in high hazard areas

The Timaru Town Centre focus with the primacy focus for retail being the CBD would have been applauded. We now understand this planning for a city centre zone and large format retail becomes redundant when the showgrounds development goes ahead and so once again, we raise concern that this development appears to be in direct opposition to robust planning and indeed TDC's own planning. This raises a question of legitimacy and strategy – with a plan that has been through the formal approval processes with the Council and is now at Phase 3!

EQPB A question has also been raised about the potential impact of heritage status on some central buildings and despite the possible option of access to EQUIP funding will this status restrict further the opportunities for redevelopment and increase remedial costs for EQPB?

Concern was also raised that the City Hub Strategy appears to be being developed independent of the Draft District Plan and that both would benefit from being connected with themes and strategies. In addition, the new heritage centre also appears to have been through a further independent and unconnected planning process, including how to connect across the CBD and associated services that should be included in this development. It is recommended that Council's current and future capital-built projects be co-ordinated and that TDHL's property portfolio also be aligned to enable the most effective and enduring planning.

Rural Setbacks

Concern has been raised about rural setbacks and the need to understand why agricultural storage and service buildings are to be discouraged next to the roadside. It is requested that this area is reviewed and is referenced further later in the feedback.

Release of Land for Residential Development

The current proposed limitations on land for residential development are questioned, although there appears to be sufficient available land and housing; developers are consistently citing this as an issue. The impact of land banking needs to be worked through with a progressive stance. The ability to attract workers to the district is based on a range of factors including affordable, accessible and available housing stock. As a district we need to have a range of options to be attractive to a skilled work force.

Review of the Growth Management Strategy

We understand this is being reviewed and independently tested by a qualified economist. This is valuable as the Chamber has previously submitted that the Growth Management Plans appear to be built on extremely conservative and status quo style planning. The Council is encouraged to think further ahead and to bring in the infrastructure that will enable growth.

In line with this view we encourage industrial land to be serviced and accessible to enable effective attraction of commercial activities. Other districts close to the Timaru District have benefited from taking a more pro-active stance on this issue.

Urban Design Specialist

The Council is encouraged to consider input from an urban design specialist to assist with the overall direction being taken and to create a focus on creating beautiful architecture and landscaping of public spaces. The CBD lacks green community and meeting spaces with the current CBD central focus built on traffic lights and public toilets! The suggestions received to genuinely beautify this Timaru town include an option that the library space could become a wonderful central park area. Creative vibrant community focused areas need to be developed.

Difficulties in interpretation and understanding

With name changes to zones and the complexity of the overall plan it is very difficult for people to understand and interpret the district plan changes. These need to be simplified with clear comparisons for ease of interpretation.

Existing Land Use

We understand that many of the provisions in this draft plan will not have an immediate effect on landowners due to existing land use provisions in the RMA. That TDC advises the proposals in the Draft Plan will not affect “existing enterprises”, however, landowners appear to have little comfort in the existing land use provisions in the RMA and so we encourage TDC to ensure the plan can be applied in a practical sense to all farming operations whether they are existing or not.

Ecan Land Use Consent is required for all farms and therefore ask that TDC doesn't cover ground and issues that are already regulated by the regional council.

We also understand that a territorial authority must prepare a district plan that must be consistent with the regional plan and suggest that in a number of cases this is not what has been presented.

We have been advised that there are serious inconsistencies with Ecan's Plan Change 7 and that the TDC Draft District Plan places far greater restrictions on land use than the regional plan.

Other matters raised by members include:

Clarification on the definition of **intensively farmed stock** needs to be reconsidered to ensure it does not exclude normal farming activity and is better aligned to those definitions used by other District Councils.

Setbacks for intensively farmed stock and stock buildings. This has a major impact on many current operations and although TDC have advised this is a mistake it is important that the proposed amendment/correction is fully published to allow for timely feedback and corrections as needed.

Sites and areas of significance to Maori – it is noted that the objectives of the plan are to enable access and use of resources in areas of cultural value and to protect areas of significance from inappropriate use and subdivision. Without specifying

what this might include it is challenging for all concerned to be comfortable with the context and likely implications. It is also proposed that normal farming practice should not be considered inappropriate. It is also noted that the Runanga sensitive sites mapped by Ecan are very different to those mapped by the TDC, this should be reviewed and aligned. We also recommend that the TDC facilitate meetings between landowners and iwi to enable a solid and shared understanding, with workable joint solutions.

Thank you for the opportunity to provide feedback and we look forward to engaging further as the District Plan is developed to the next stage.

Regards

A handwritten signature in black ink, appearing to read 'Wendy Smith', with a long horizontal flourish extending to the left.

Wendy Smith
Chief Executive
South Canterbury Chamber of Commerce