

BEFORE THE TIMARU DISTRICT COUNCIL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the Proposed Timaru District Plan Hearing G
(Growth)

**STATEMENT OF EVIDENCE OF NATHAN HOLE ON BEHALF OF
ROONEY GROUP LIMITED AND OTHERS**

Dated 27 June 2025

MAY IT PLEASE THE HEARING PANEL:

1. My full name is Nathan Henry Hole. I am employed by Rooney Group Limited (**RGL**) as Senior Advisor – Environmental Policy & Projects.
2. I hold the qualification of Bachelor of Science (Environmental Science) from Lincoln University.
3. I have over 16 years' experience working as a resource management planner for both district and regional councils, including 9 years as Planning and Regulations Manager at Mackenzie District Council, and Team Leader – Consents and Compliance at Timaru District Council from November 2018 to August 2021. I have been employed by RGL in my current role since August 2021.
4. I am providing this evidence in my capacity as an employee of RGL, not as an independent expert, although my evidence represents my professional view and is within my area of expertise.
5. I am authorised to provide this evidence on behalf of Rooney Group Limited, Rooney Holdings Limited, Rooney Earthmoving Limited, Rooney Farms Limited, Timaru Developments Limited (**Rooney Group**) and Mr Ryan De Joux.
6. While I am an employee of RGL, I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and agree to comply with it. I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

SCOPE OF EVIDENCE

7. In relation to the matters being considered by Hearing G, Mr De Joux made a submission made a submission seeking that all Future Development Areas (**FDAs**) identified as “beyond 10 years” be amended to “beyond 5 to 10 years”. Rooney Group made a further submission supporting Mr De Joux’s submission and also made a further submission supporting White Water Properties Limited’s (**WPL**) submission seeking the rezoning of FDA 13 to General Industrial Zone (**GIZ**). Rooney Holdings Limited (**RHL**) is now the owner of the land within FDA 13 previously owned by WPL. The scope of my evidence is limited to those submissions, and this particular statement of evidence relates only to the Growth provisions affecting FDA 13 and FDA 14.

8. I have read Mr Bonis' section 42A report including the appended reports and statements of evidence that that Mr Bonis has relied on in reaching his conclusions.
9. Rooney Group and Mr De Joux have chosen not to provide technical evidence in relation to this hearing. Instead, I will provide evidence to explain the background to acquiring the land within FDAs 13 and 14, and the need to provide for additional development capacity within both FDAs for residential expansion within FDA 14 and industrial expansion within FDA 13.

FDA 13

10. In relation to the submission and further submissions made regarding FDA 13, Rooney Group's preferred outcome is that FDA 13 is rezoned GIZ.
11. Between April 2023 and November 2024 RHL acquired six properties within FDA 13, including the two properties previously owned by WPL, consolidating ownership of 33.48 hectares within FDA 13. This land also adjoins RHL's existing industrial zoned land at Washdyke. This leaves approximately 27.4 hectares or 45% of FDA 13 that is not owned by RHL, of which the majority is north of RHL's holdings.
12. RHL's ownership of industrial zoned land under the Operative Timaru District Plan (**ODP**) is 58.73 hectares and extends north from the residentially zoned land at the end of Flemington Street between SH1 and Seadown Road to the FDA 13 boundary. It also extends across Seadown Road, between the road and the Railway line from 66 Seadown Road at the south (NZ Couriers site) to 130 Seadown Road (Rooney Farms Ltd storage shed), and east of the railway line to the intersection of Seadown Road and Meadows Road. The total ownership area of industrial zoned land under the ODP is 58.72 hectares, and the combined total of FDA 13 and ODP industrial zoned land is 92.21 hectares.
13. Attached are maps showing location and extent of these areas and proposed FDA 13. These are:
 - **Attachment 1** – Google Map showing the extent of Industrial zoned land under the ODP that is owned by RHL (blue outline), and the extent of the land within FDA 13 that is owned by RHL (red outline).
 - **Attachment 2** – Proposed Timaru District Plan (**PDP**) mapping tool showing the full extent of FDA 13 and RHL's ownership within that (red outline).

- **Attachment 3** – Rooney Earthmoving Plan showing built development and areas under development.
- **Attachment 4** – Canterbury Map showing street numbers and extent of Council sewer and water reticulation.

14. As shown on the attachments, the Rooney Earthmoving Limited (**REL**) site with the leased bulk storage sheds is nearing capacity. The land on the east side of Seadown Road is also currently being confirmed for development, with several viable businesses in discussion for tenancies. Without FDA 13, this only leaves the narrow strip of land east of the railway line, between the rail line and Meadows Road for development, being 4.92 hectares.
15. It is important for maintaining development opportunities for the district and for business continuity that RHL is able to extend into FDA 13 as the market allows.
16. Rooney Group has consistently advised Timaru District Council since June 2023 that there is a need to be able to expand into FDA 13 to meet market demand. The company offers a unique service to clients, whereby RHL is able to provide a leasehold turnkey product where the client does not need to fund the capital purchase of the land or the construction costs. This has enabled businesses to establish or grow their operations, as shown by the uptake and recent activity from national, regional and local businesses on the RHL sites.
17. Rooney Group has a proven track record of delivering development projects as anticipated. This is evidenced by the year-on-year continual development of the REL site between SH1 and Seadown Road where several bulk storage sheds have been constructed and tenanted, as well as retail activities such as PGG Wrightson Ltd and an NPD fuel outlet. The last bulk storage shed to be constructed was in 2024 and is 8,500 square metres. The scale of the development in combination with the services that Rooney Group provides means that vacant land area can be consumed quickly, emphasising the importance of having additional land available to support business growth and continued demand.
18. The ability to be nimble is incredibly important to making business decisions, and of importance to clients to be able to deliver a product quickly once a decision to proceed has been made. It is simply not reasonable or feasible for RHL to source additional industrial land at alternative locations, when the company already owns suitable land. The location of this land and the benefits that flow from that location are part of reason tenants seek out Rooney Group for their development needs.

19. The REL site between SH1 and Seadown Road does not have reticulated sewer, although there is a sewer main at the end of Flemington Street at the southern boundary. The nearby PGG Wrightson building is connected to this manhole via a Septic Tank Effluent Pump (**STEP**) system. There is also a 100mm diameter water main to the REL entrance on SH1, with internal water reticulation provided to meet the Building Act 2004 requirements for firefighting.
20. East of Seadown Road, buildings occupied by NZ Couriers Ltd and Brosnan Transport Limited (**BTL**) at 66 and 80 Seadown Road are also connected to Council's reticulated sewer via a STEP system. The wastewater is pumped approximately 215 metres south to Council's reticulated wastewater main near 54 Seadown Road. The pump station is owned by RHL and is located at the Seadown Road boundary of the BTL site has capacity for a further six connections, potentially providing capacity for the rest of this block, following the same pattern of development. A Council owned 150mm diameter reticulated watermain also extends to the BTL entrance at 80 Seadown Road.
21. No discussions have occurred to date between RGL and Council with regard to further servicing of the existing industrial zoned land owned by RHL, or the potential extension of reticulated services into FDA 13.
22. RHL holds Canterbury Regional Council resource consents to discharge on-site stormwater to ground from both the REL site between SH1 and Seadown Road, and also on the east side of Seadown Road, between Seadown Road and the railway line. Rooney Group engaged with Timaru District Council in November 2021 participating in a public workshop and providing formal feedback in relation to the management of stormwater within the Washdyke catchment. Rooney Group requested that Council include the industrial zoned land owned by RHL in the stormwater management plan for Washdyke that would form part of Council's global resource consent application to the Regional Council.
23. The RHL industrial land has not been included in the Council's consent application (CRC245046) lodged 17 June 2024. This suggests that Council would expect the landowners of FDA 13 to provide their own means of stormwater treatment and consenting. RGL's preference would be for all the RHL land, including that within FDA 13, to be included in Council's Washdyke stormwater management area under its global resource consent.
24. Seadown Road is identified as a Collector Road in the ODP for its entire length. Under the PDP the length of Seadown Road between SH1 and Meadows Road will change to a Principal Road

which includes the new link road, Road 5. It is anticipated that if any improvements are required to Seadown Road north of Road 5 resulting from the development of FDA 13 that this would also be considered at the time of the final design of Road 5.

FDA 14

25. Timaru Developments Limited (**TDL**) owns 105 Kennels Road which comprises 15.34 hectares, of which approximately 15.1 hectares is within FDA 14. TDL also has first right of refusal to purchase the adjoining (triangle shaped) property at 73 Kennels Road comprising 1.60 hectares. The balance of the land within FDA 14, being approximately 36.5 hectares, is Crown land gazetted as Timaru Racecourse Recreation Reserve. The land owned by TDL is shown on **Attachment 5**.
26. Despite FDA 14 being identified as an FDA for Urban Development, which could be either residential or industrial, TDL purchased the site with the intention of residential development. Prior to purchasing the site, TDL had undertaken a preliminary assessment of the yield available from development and considers that approximately 150 residential sections is a conservative and achievable estimate of the number of residential sections that would be available.
27. TDL has always considered that the open views across FDA 14 from the west side of State Highway 1 is better suited to residential development with less bulk and height compared to the industrial and commercial buildings present and common within the existing Washdyke industrial area.
28. Prior to purchasing the land at 105 Kennels Road, TDL had expressed an interest in purchasing land from Timaru District Council on Washdyke Flat Road. While assessing the feasibility of that site it became clear that the land was low lying and susceptible to surface flooding. It also became apparent that the Kennels Road land within FDA 14 was one of the few areas within the town that could provide a site for residential development with scale that would not have high development or building costs. This would enable TDL to provide more affordable sections to the market, than the current development areas in Gleniti. It would also provide housing opportunities in close proximity to Washdyke for people working in the commercial and industrial areas.
29. While FDA 14 has no reticulated sewer, water or stormwater, sewer and water are available approximately 900 metres from the boundary of the land owned by TDL. It is most likely that

stormwater from any FDA 14 development would be reticulated within the subdivision and then discharged to ground via a treatment and retention basin. This leaves providing reticulated sewer and water to the site.

30. Mr Kemp's evidence refers to Council reporting which previously estimated the cost of providing reticulated services to FDA 14 to be in the range of \$13-15 million, which has in turn been relied on by Mr Bonis in his report.
31. This cost estimate was part of a meeting paper presented to Council at an Ordinary Meeting on 26 March 2024 and was identified as Attachment 1 to that report as "*Andrew Ross Report*". The attachment refers to a "*high-level desktop analysis*" that provides the combined estimate of servicing both FDA 13 and FDA 14. The figure provided by Mr Kemp to service FDA 14 and relied upon by Mr Bonis is not therefore accurate, given it also includes the estimated costs of servicing FDA 13.
32. In addition, the Ross report identifies a key assumption of providing a wastewater main to the centre of each FDA. It is unclear if the cost of providing a water main to each FDA also includes providing the main to the centre of the FDAs, although that is assumed to be the case.
33. I raise this point as it is always the developer of a site that pays for the reticulated infrastructure within the site, whether this is roads, or three waters. For this reason, the Ross report should have only estimated the cost to the Council, being the cost to provide the infrastructure to the boundary of the FDAs.
34. TDL's own estimate of providing mains reticulated sewer (including the provision of a pump station) and water to the boundary of 105 Kennels Road is significantly less than the figure estimated in the Ross report.
35. For the reasons described above, I disagree with Mr Kemp's cost estimate for providing reticulated three waters services to FDA 14. In terms of funding the cost of extending the reticulated water and sewer network to the boundary of 105 Kennels Road, TDL has always been open to working with Council as to how this is funded, and whether TDL funds the cost of the installation in conjunction with an agreement with the Council to repay those costs of time through financial contributions relating to connections. TDL would also install the infrastructure so that it was capable of servicing the balance of FDA 14, should that be developed.

36. I consider that the cost of installing reticulated sewer and water to FDA 14 has been overstated and is not the financial impediment portrayed.
37. Mr Bonis in his report notes that there is no funding for servicing FDA 14 in the Council's Long Term Plan 2024-2034 (**LTP**). The fact that no funding has been provided for servicing FDA 14 in the LTP is not unusual and not an impediment to the site being developed. LTPs are reviewed every three years. There is clearly an opportunity for any council infrastructure funding for the site to be included in the next LTP review.
38. I would suggest that it is not unusual for Council's not to budget for infrastructure costs ahead of an area of land being able to be developed, or ahead of understanding what Council's budget costs may be. This does not need to impede the process for the land to be re-zoned, any LTP budget reviews can then follow accordingly.

N H Hole

27 June 2025

Rooney Group Limited

ATTACHMENT 1

RHL land - FDA 13

Long Acre Nā Studio

Morrison Park

RHL Industrial
Land ODP

Phar Lap Raceway

NPD Washdyke

Phar Lap Raceway

Freeman Roofing Timaru

Waitomo Timaru

Vendella Group

Google Earth

Image © 2025 Airbus



Rooney Holdings Limited - FDA13 Washdyke



Page 1 of 2
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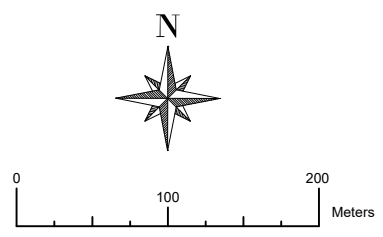
ATTACHMENT 3

GENERAL NOTES

1. COORDINATES IN TERMS OF TIMARU CIRCUIT 2000.

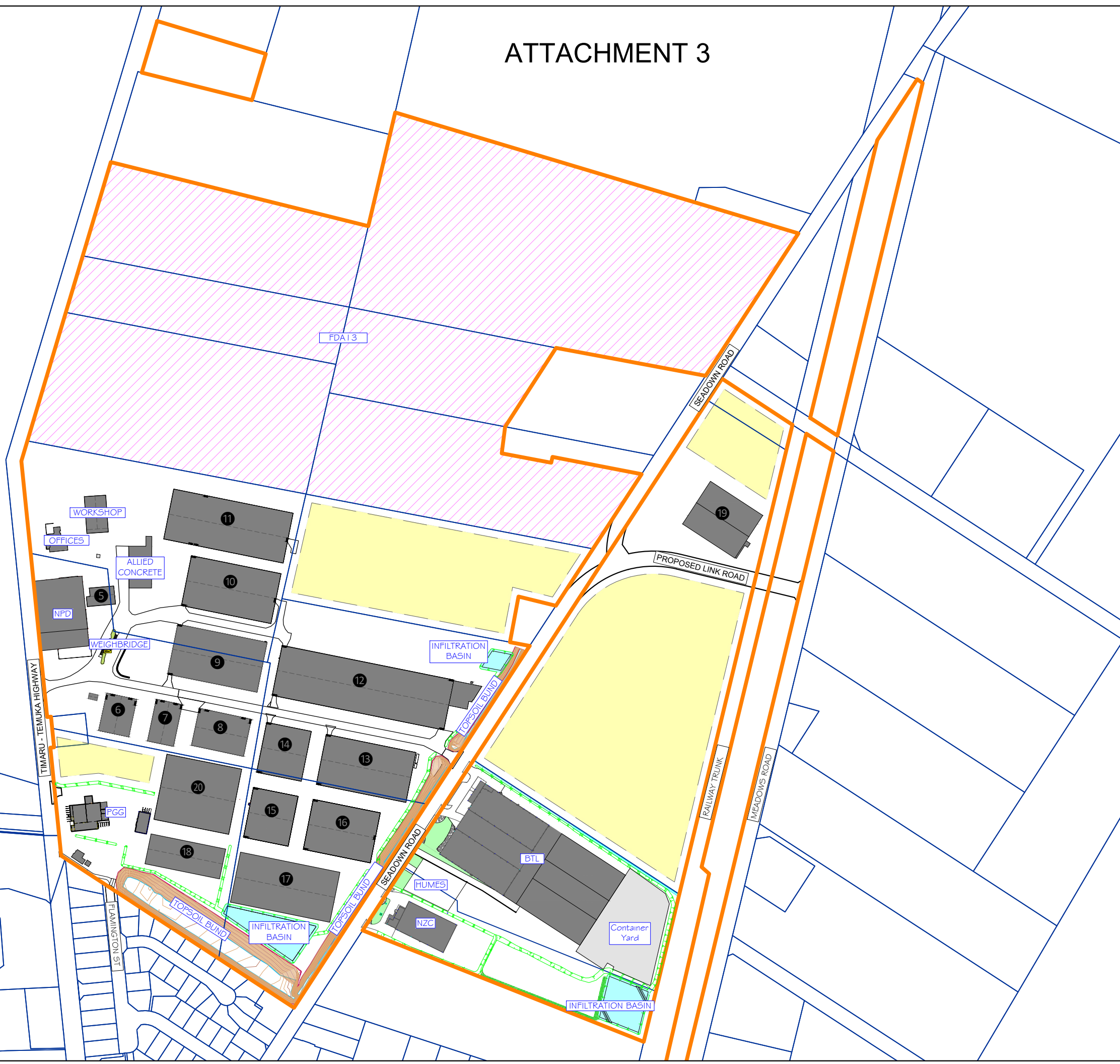
Key:

- Section Boundary
- RHL Owned Property Outline
- Existing Sheds / Building
- RHL Owned Future Development Area (FDA13)
- RHL Areas Under Development



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| A | Issue | 17/06/2025 |
| No. | Revision / Issue | Date |

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|---|------------------|
| ROONEY HOLDINGS LTD | |
| TIMARU YARD CURRENT & DEVELOPMENT AREAS | |
| DESIGN: C.S. | DATE: 17/06/2025 |
| DRAWN: C.S. | DATE: 17/06/2025 |
| APPROVAL: N.H. | DATE: 17/06/2025 |
| SCALE 1:5000 ON A3 | |
| ALL DIMENSIONS ARE IN METRE | |
| PAGE: 404-01 | |





ATTACHMENT 5

FDA14 - Kennels Road
Timaru Developments Limited



Note: Approx. 15ha of TDL land is within FDA14 (TDL Record of Title area is 15.34 ha)