

**BEFORE THE INDEPENDENT HEARING COMMISSIONERS APPOINTED BY  
TIMARU DISTRICT COUNCIL**

**UNDER** the Resource Management Act 1991 (RMA)

**IN THE MATTER** In relation to the proposed Proposed Timaru District Plan  
- Hearing G (Growth Chapter)

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**STATEMENT OF EVIDENCE OF SONIA REID DOLAN**

**ON BEHALF OF NORTH MEADOWS 2021 LTD (SUBMITTER NO. 190)**

**27<sup>th</sup> June 2025**

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## **Introduction, Qualifications and Experience**

- 1 My name is Sonia Reid Dolan
- 2 I hold a degree in Resource and Environmental Planning from Massey University. I am a Full Member of the New Zealand Planning Institute.
- 3 I am a Principal Planner at Davis Ogilvie (Aoraki) Limited. I have approximately 20 years' experience in policy, strategic and professional resource management planning.
- 4 Prior to joining Davis Ogilvie (Aoraki) Limited I have been working primarily in strategic planning, policy planning and land use planning. Of relevance to the growth chapter, I have been involved in numerous planning projects involving the rezoning of land and residential land development when I was employed at Kainga Ora and doing population growth and demand capacity for new schools when I was employed at the Ministry of Education.
- 5 Although this evidence is prepared for a Council hearing, I have read the code of conduct for expert witnesses contained within the Environment Court Practice Note 2023 and agree to comply with it. Other than where I state that I am relying on the evidence of another person, I confirm that the issues addressed in my 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 opinion that I outline in this statement.

## **Scope of my Evidence**

- 6 My evidence relates to the North Meadows 2021 Ltd submission (Sub: 190) on the PDP – Growth chapter. It addresses:
  - (a) the relief sought in the submission;
  - (b) the further information provided to Timaru District Council; and
  - (c) the recommendations set out in the Section 42A Report.
- 7 In preparing my evidence I have reviewed:
  - the PDP;
  - the Section 42A Report for Hearing G: Growth of the PDP by Mr Matt Bonis.
  - the original submission on the PDP;
  - the National Planning Standards;

- the National Policy Statement for Highly Productive Land (NPS-HPL);
- National Policy Statement on Urban Development 2020 (“NPS-UD”) and;
- Any supporting evidence

### **The submissions**

- 8 There were several points within the submission. In relation to this evidence the submission points relate to the following;
- a. Rezone 236 Meadows Road from General Rural Zone to General Industrial Zone.

### **Relief Sought**

Within the scope of the submission, I propose the zoning change of either immediately to General Industrial Zone (GIZ) or to be rezoned to Future Urban zone (FUZ) purposes.

### **Post the Hearing process**

As part of the package of the relief sought, I propose expert caucusing (post the hearings timeframe) to formalise and reach agreement as part of the District Plan review.

## **FURTHER INFORMATION PROVIDED TO TIMARU DISTRICT COUNCIL**

- 9 Following the release of the preliminary S42a report, all submitters had to provide for the required information by 20 February 2025. This is attached in **Appendix A**.
- 10 Of relevance these matters include;
- a) Planning framework matters
  - b) NPS:UD
  - c) NPS:HPL
  - d) Transport Network Integration
  - e) Hazards information – Liquefaction and Flood hazard assessments
  - f) Servicing provision and infrastructure integration
  - g) Environmental Values

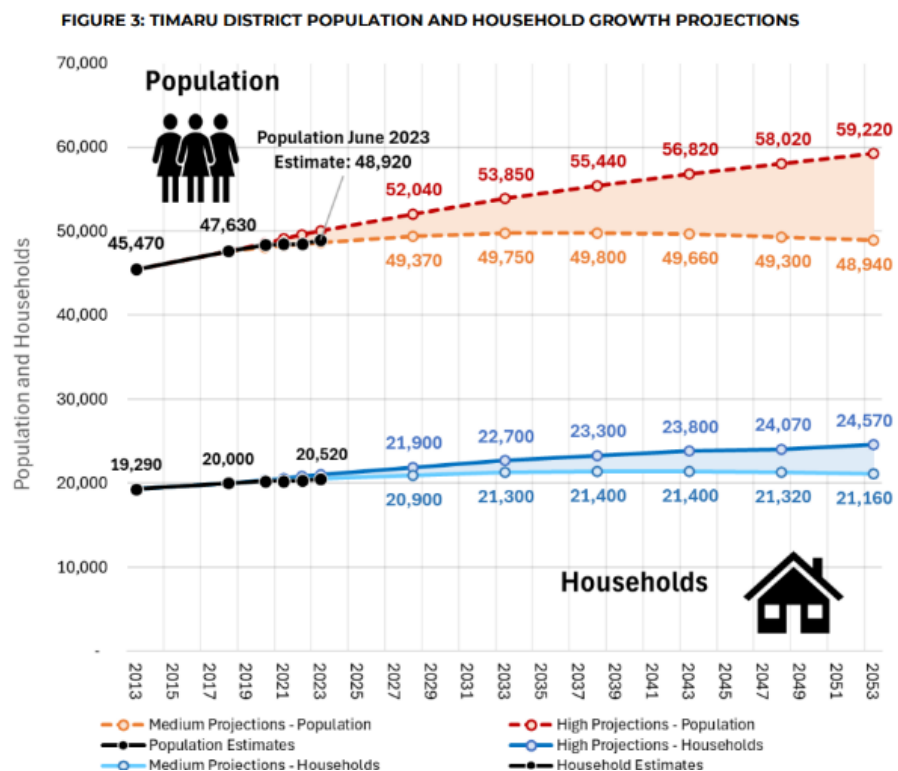
### Section 42 report and deliberations

- 11 Mr Bonis sets out several matters within the Section 42A Report. They relate to satisfying the RMA legislation and tests as set out under the NPS:UD and NPS:HPL and other related matters.
- 12 Given the further information was supplied on the 20<sup>th</sup> February 2025 and in addition to this evidence above that was already supplied, within the s.42 report Mr Bonis asked for more evidence such as;
  - a) Infrastructure provision and
  - b) NPS:HPL

### Property Economics report and modelling

- 13 I note that Mr Bonis is heavily guided on any additional zoning based on the Property Economics (PE) industrial capacity assessments, including the updated report dated May 2025.
- 14 I disagree with Mr Bonis statement that the inclusion of rezoning for this site is not required for various reasons as set out below.
- 15 I note that the Property Economics reports (previous and updated assessments) have not been peer reviewed to analyse the data and confirm the assumptions made. Based on best practice and given the heavy reliance on the PE analysis it is considered that Council should have that work peer reviewed.
- 16 While the Property Economics (PE) assessment identifies a total vacant industrial land capacity of approximately 163ha across the Timaru District, this figure includes sites that are neither serviced, nor development-ready, nor necessarily feasible to deliver in the short to medium term. The report conflates “zoned” land with “available” land, which misrepresents the true supply situation on the ground. Many sites identified are constrained by servicing deficits, flood hazards, fragmented ownership, strategic ownership or unsuitable configurations for modern industrial uses.
- 17 Notably, the PE report provides **no functional typology analysis** – it does not differentiate between small, isolated blocks and large contiguous parcels needed for heavy industry or anchor tenants. It also lacks segmentation by **readiness**, such as access to three-waters infrastructure, road upgrades, or current ownership intent. This absence of granularity undermines its utility for assessing actual market supply.

- 18 As such, I consider that the report overstates effective capacity, particularly in Washdyke, where the market-ready land supply is extremely limited. The submitter's site – already partly consented and adjacent to critical infrastructure – offers a unique opportunity to expand capacity in a sequenced, infrastructure-aligned manner, consistent with the intent of the NPS-UD. As recommended further in my evidence, a (FUZ) Future Urban Zone overlay would enable Council to preserve the long-term value of this land while allowing for coordinated planning and delivery.
- 19 I note that Mr Bonis throughout his 42a report in assumptions for how growth should be measured, he refers to the medium growth scenario as set out in the Stats NZ modelling population predictions. I note this is a very conservative line to take and is not in line with the current population trend as outlined further down in my evidence. Going forward, for this evidence I will reference to the high growth scenario as this is a more realistic scenario and is consistently used by other central government agencies as a baseline for population predictions.



- 20 Based on the line graph above, it is assumed that the Timaru District would plateau in its population predictions within the period of 2021 to 2025.
- 21 I note that despite the plateau population predictions, the Timaru District population has had an uptick of growth. This is due to employment

opportunities, affordable housing and an attractive lifestyle. The local economy is strong and the primary industries which has been in a growth mode for the past year and this continue to provide employment and opportunities for people to relocate to the District. Based on the Infometrics website<sup>1</sup> the Timaru population has exceeded the medium projections scenario and is in line with the high population modelling forecast. For example, **in 2023 alone had a population increase of 1.9% (an increase of 900).**

- 22 Based on the high population scenario, I now turn to table 5 below. The property economics report states Vacant – Expansion land represents vacant land which is not currently available to the general market. Thereby in Timaru alone there is 84.2ha available.

TABLE 5: DISTRIBUTION OF VACANT INDUSTRIAL LAND BY AREA AND STATUS (HA)

	Vacant	Vacant - Expansion	Expected Vacant	Total
Timaru	5.4	0.4		5.8
Washdyke	76.2	22.3		98.5
Smithfield - Timaru	1.7	1.8	11.9	15.3
Redruth - Timaru	0.9			0.9
<b>Timaru Town</b>	<b>84.2</b>	<b>24.4</b>	<b>11.9</b>	<b>120.4</b>
Geraldine	14.6	9.5		24.1
Pleasant Point	1.4			1.4
Temuka	9.7	1.1		10.9
Winchester	5.4			5.4
Fonterra - Clandeboye		62.2		62.2
Pareora Meatworks		11.8		11.8
<b>Excluding Timaru</b>	<b>31.1</b>	<b>84.7</b>		<b>115.8</b>
<b>Total</b>	<b>115.3</b>	<b>109.1</b>	<b>11.9</b>	<b>236.3</b>

Source: Property Economics, Timaru District Council.

The demand vs capacity table is set out below:

TABLE 6: TIMARU DISTRICT INDUSTRIAL LAND DEMAND SUFFICIENCY TO 2053 (HA)

Industrial Land (ha)	2025	2028	2033	2053
Gross Land Requirement + NPS Buffer		50	88	210
Vacant Land	163	163	163	163
<b>Net Sufficiency + NPS Buffer (ha)</b>		<b>113</b>	<b>75</b>	<b>-47</b>

Source: Timaru District Council, Property Economics.

- 23 The district is assessed to have a total vacant industrial land provision (excluding land surrounding Fonterra and Pareora but including the Alliance Smithfield site) of 163ha. I note that in respect to the Alliance Smithfield site, Mr Bonis includes the Alliance Smithfield site *'has been sold for industrial development, so the associated land area of 11.9ha goes back*

<sup>1</sup> Source; Infometrics website June 2025

*into industrial capacity*'. I disagree with including this land area of 11.9ha due to the site not presenting itself as 'vacant land' and available in its entirety for industrial use and purposes. This piece of land if it was to repurposes would have a lot of other challenges as far as demolition and the land is likely to be contaminated.

- 24 The amount of vacant land is therefore 151.1 ha. Further to this as the Industrial vacant land quantum is for the entire District, and I note that the vacant land for Washdyke is noted at 76.2 ha, however there is no breakdown as to how the vacant land is measured , nor is there is no methodology for quantifying the metrics for what the land demand is for the short, medium and long term. I do note that whilst there is a higher vacancy rate across the board, there is a shortage of large industrial sites, and the addition of the remaining balanced lot would contribute to providing supply as a vacant industrial lot, which are currently in short supply.

#### **National Policy Statement: Urban Development and Government Temporary Powers**

- 25 As set out under the NPS:UD 3.7 (c) (and inclusive of Tier 3 Councils) Councils must consider other options to overcome the insufficient development capacity. This would be either by (a) increasing development capacity or (b) enabling development. I note that further the government made a recent announcement on the 18<sup>th</sup> of June that it will use its powers temporarily to override Councils if they *"modify or remove provisions in local council plans if they negatively impact economic growth, development, or employment"*. I ask the Hearings Panel given that many gaps and deficiencies within the Property Economics report as raised in my earlier statemens, then this would need to be revised to see if there sufficient development capacity in the short, medium or long term.
- 26 I ask the Hearing Panel to investigate that the changes are receptive to what the current government is pushing for to ensure that an introduced planning framework is robust and will not *"hinder economic growth, development, or employment"*. This applies in the context of providing sufficient industrial land to enable development and ultimately provide employment for the District.

### **Rezoning or FUZ of balanced part of 236 Meadows Road**

- 27 Whilst I **support** the rezoning of part of 236 Meadows Road (14Ha developed or consented for Industrial activities), I seek that the balanced part of 236 Meadows Road be either;
- (a) To be rezoned GIZ (General Industrial Zone) or
  - (b) To be rezoned FUZ (Future Urban Zone) – and to be rezoned for Industrial purposes (GIZ) at a later time
- 28 Whilst the clients preference would be to have the remaining balanced land to be immediately rezoned as a General Industrial Zone (GIZ), with many other matters raised by Mr Bonis and in the context of these constraints, I recommend that Future Urban Zone (FUZ) be put in place as an alternative. The rationale behind this is that the benefit of the FUZ for industrial purposes can be driven by the need to unlock industrial capacity and meet the demand for industrial land should the district experience strong economic growth in the future. I note that other Councils such Waipa District Council has set aside Future Urban Zoned land for industrial land purposes only.
- 29 The benefits of the Future Urban Zone can be subject to a structure plan that would also incorporate further technical investigations. I note like other Councils the infrastructure costings can be worked through with the LTP process and/or privately funded with agreements in place between the developer and Council.
- 30 The FUZ will also ensure that the Council is consistent with the National Planning Standards, be consistent with the directive of other Councils and be receptive to what the current government is pushing for to ensure that an introduced planning framework is robust and will not *“hinder economic growth, development, or employment”*.
- 31 I will now speak to all other matters to include;
- a) Infrastructure provision and
  - b) NPS:HPL

### **Infrastructure provision**

- 32 I note that in respect to infrastructure matters, that Mr Bonis rejects the request to rezone based on lack of infrastructure provision. I note that the



TDC Growth Management Strategy states under C:2.1 – Benefits of the GMS;

*“Targeted infrastructure costs. Servicing land use growth affects Council expenditure, which affects rates. A strategic, integrated and proactive approach to the provision of new land areas to meet demand in homes, shops and industry, with infrastructure provided proactively as and when needed means increased certainty. Both in terms of the wider community, and of the costs borne by the development community through their contributions to infrastructure provision. The Council’s expenditure is then focused towards where actual growth will occur, resulting in efficient and prudent Council infrastructure investment”.*

- 33 In summary of the above from the GMS is implicit that servicing land use growth will occur. Along with the provision of the infrastructure, the client accepts that the infrastructure upgrade costs may need to be paid at their cost. However, for any upgrade that occurs that may result for overall public benefit then accordingly these costs should be shared between Council and the developer.
- 34 Further to the statement above, Selwyn Chang, a qualified Civil Engineer has provided an engineering memo as attached in **Appendix B**.

#### **Infrastructure and Servicing Memo (Refer Appendix B – Selwyn Chang)**

- 35 Appendix B to this evidence contains an infrastructure and servicing memorandum prepared by Selwyn Chang, a Chartered Professional Engineer and Senior Project Engineer at Davis Ogilvie. His memo assesses the servicing feasibility of the submitter’s site at 236 Meadows Road in the context of the proposed Future Urban Zone (FUZ), with an intended future zoning of General Industrial Zone (GIZ).
- 36 Mr Chang’s memorandum confirms that the site is well positioned for future industrial development, directly adjacent to Council’s Wastewater Treatment Plant, proximity to high-pressure water mains, and road frontages that are either already undergoing upgrades (Meadows Road) or anticipated to be upgraded in the future (Aorangi Road) as part of broader industrial expansion.

In summary:

- **Wastewater:** Options exist for domestic and trade waste servicing via extensions along Aorangi Road, supporting not only the submitter's site but also future connections to the Washdyke Industrial Expansion Zone (WIEZ) and FDA13.
  - **Water supply:** High-pressure water is available nearby, and connection can be achieved through standard developer-funded extensions subject to Council modelling.
  - **Stormwater:** Anticipated to be managed onsite with appropriate attenuation and discharge to existing ECAN drains, in line with TDC and ECAN expectations. This replicates the servicing approach approved for the adjacent consented 10ha development.
  - **Transport:** Roading upgrades to Meadows Road within the vicinity of the site are required to be undertaken as part of the 10ha consent, and Aorangi Road is expected to be upgraded through future development. This ensures the surrounding road environment will be commensurate with the industrial zoning sought.
- 37 The memo supports the submitter's request for a FUZ overlay by confirming that infrastructure capacity, staging and funding mechanisms can be appropriately addressed through future structure planning. It also highlights the strategic advantage of the submitter's land being held in single ownership, allowing for coordinated delivery, unlike more fragmented areas within FDA13.
- 38 This engineering assessment provides a practical and delivery-focused response to the servicing concerns raised in the s42A report. It reinforces that the site is not constrained by infrastructure availability, and that FUZ provides the appropriate planning framework to resolve remaining delivery detail prior to enabling live industrial zoning.

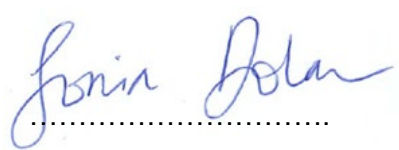
#### **NPS:HPL**

- 39 I note that the clients 16ha balance lot is a mix of class 2 and 3 soils, and due to timing we are unable to provide any supporting assessments in relation to the NPS:HPL. In any case I note that the adjoining 14ha consented activity had "satisfied to had passed all three tests of the HPL in relation to clause 3.10". Likewise I recommend that balanced lot would also

likely to fulfil the NPS:HPL tests, given it will serve itself in a similar built form for industrial purposes and use over its lifetime.

### **Overall conclusion**

- 40 Whilst I **support** the rezoning of part of 236 Meadows Road (14Ha developed or consented for Industrial activities), I seek that the balanced part of 236 Meadows Road be either;
- (a) To be rezoned GIZ (General Industrial Zone) or
  - (b) To be rezoned FUZ (Future Urban Zone). The FUZ is supported with a view that the land be rezoned for General Industrial Zone purposes once a structure plan has been locked in.
- 41 I consider that the matters raised by Mr Bonis in his s.42a report have been addressed as per above.
- 42 I recommend that the Property Economics report be peer reviewed, the data be reanalysed to ensure that there is sufficient industrial capacity for the short, medium and long term.
- 43 There is no methodology for how this table was calculated and based on stronger population and economic growth within Timaru itself, I ask the Hearing Panel to further investigate and quantify the metrics and projections to ensure that sufficient industrial land be allocated for the short, medium and long term. I recommend that a stock take of current available industrial land and known future industrial land releases were used as indicators for supply.



**Sonia Dolan**

**Date 27<sup>th</sup> June 2025**