

## 248.1 Whitewater Properties Limited submission – remove Future Development Area overlay and rezone as General Industrial Zone

For clarity, Rooney Holdings Limited (**RHL**) has purchased the land that was owned by Whitewater Properties Limited (**WPL**) within Future Development Area (**FDA**) 13 that is the subject of WPL's submission. RHL also made a further submission in support of the submission by WPL.

### Give effect to NPS - UD

*Question 1 - What is the contribution of the rezoning 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**)?*

Within FDA13 RHL owns or has under contract 33.48 hectares or 55 percent of the area for which rezoning is sought. This is a natural extension of the RHL site occupied by Rooney Earthmoving Limited, the various inland port bulk storage facilities, PGG Wrightson, NPD and Allied Concrete.

At this site four large bulk storage sheds have been constructed since 2020, varying in size between 4000m<sup>2</sup> and 9000m<sup>2</sup>, as well as the PGG Wrightson development completed in 2023 with a total site area of 7100m<sup>2</sup>. The over site development since 2020 has added 28,000m<sup>2</sup> of building floor area on a developed area of approximately 8.1 hectares.

The steady rate of development on RHL's Washdyke site has supported significant economic activity at the Port of Timaru. Many of the products in the bulk sheds enter the district through the port. All of the sheds in the current site are fully committed, and the development of the RHL industrial site between SH1 and Seadown Road has reached capacity to the point that any additional bulk storage sheds would now need to expand into adjoining FDA13 to the north. It is important for the bulk storage inland port component of the business to be able to develop into FDA13 as all the bulk storage product enters and exits the site through the existing two-way weigh bridge. It would not be feasible or practical to replicate this inland port facility infrastructure in another location. It is not efficient or necessary to double up on what is already present and functioning on the existing site.

The rezoning of FDA13 area as part of the Proposed District Plan (**PDP**) process is a necessary action if the Council is to provide sufficient capacity to enable demand to be met for industrial growth.

RHL's other existing industrial land between Seadown Road and the rail corridor contains approximately 8.5 ha of undeveloped land which is more suited to businesses that require road frontage for visibility and function. For example, Brosnan Transport Limited (**BTL**) a significant logistics company, is located on Seadown Road, along with NZ Couriers and Humes NZ. This existing industrially zoned land will continue to be steadily developed as the market demands.

The Property Economics analysis simply does not reflect our experience on the ground in the district. We see continued strong demand. Waiting another ten years for FDA13 to be freed up will simply not meet the requirement to provide sufficient capacity in our view.

*Question 2 - For residential and business rezonings how would rezoning 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 land identified as FDA13 is a natural extension of the existing industrial zone and is already part of a functioning urban environment. The development into FDA13 will provide significant economic benefits for the wellbeing of the community by enabling business growth and development, providing continued and further employment opportunities for the local community. The site will meet the policy test in relation to climate change effects as it is significantly further inland than other industrial zoned land in Washdyke and is not within a high hazard flood risk area.

#### **Give effect to NPS-HPL**

*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.*

It is acknowledged that at present FDA13 meets the interim definition of HPL in the NPS HPL. The effect of this would be to prevent rezoning, but this is subject to upcoming Environment Canterbury (**ECan**) mapping and to a signalled change in government direction. Ideally the PDP would be deferred until the uncertainty around whether or not the provisions of the NPS-HPL will need to be complied with is clear, given the significant impact on land use and development and the signalled changes.

#### **Give effect to CRPS**

*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).*

The rezoning of FDA13 does provide for a coordinated pattern of development as this is a natural extension of the existing RHL site. As RHL owns 34.48 hectares adjoining the existing zone boundary, this provides some certainty that the new land will not be developed in an ad hoc manner and will be a natural progression of the existing site. Since the PDP was notified RHL has consolidated the ownership of five separate properties within FDA13 to enable a coordinated pattern of development into FDA13 from the existing RHL site.

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

Yes it does. The land is directly adjoining an existing industrial hub. Rezoning for industrial development at this site will ensure traffic to and from the port or other industries will not be forced to travel further to other sites.

*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 site is within a flood hazard assessment area with the PDP but is not within a high hazard area. The land is not near any waterways or within any identified overland flow paths, and is significantly further inland than other existing industrial sites at Washdyke.

### **Achieve and Implement 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?*

Development of the land will achieve a coordinated pattern of development due to RHL having consolidated and now owning the majority of the land with FDA13. The RHL site is serviced by a reticulated 100mm diameter water main, has reticulated sewer to part of the site from the 150mm diameter sewer main on Flemington Street, and RHL has its own stormwater discharge permits from ECan.

If necessary, the reticulated sewer and water can be extended north through the RHL site into the FDA13 land. It should be noted that reticulated sewer has not been required for the bulk storage development on RHL's Washdyke site, as the industrial activities established have not required a reticulated sewer connection and have met those requirements through alternative means such as holding tanks. It is possible that if the inland port storage facilities were to continue expanding into FDA13 that reticulated sewer may not be required and alternative means may suffice.

### **For General Industrial Zone**

*Question 10 - **Growth Rezoning / 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'?*

As discussed above, the RHL land occupied by Rooney Earthmoving Limited and others is nearing capacity, through consistent development year on year to the point that additional land is now required.

## **Infrastructure 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.*

Management of stormwater is in accordance with ECan resource consents at present. Water sensitive practices can be required at a policy level in the PDP as part of the zoning provisions, which can provide for best practice to be implemented at the time of specific design.

*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.*

As described above, we have experienced strong demand for our industrial sites and additional appropriately zoned land is now required to provide for continued development on the immediately adjoining area. In our view the rezoning of FDA13 is necessary to meet the requirement for the provision of sufficient development capacity. It would also provide for integration and efficiency of industrial development.

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

There is no reason to suggest the ground conditions of the land within FDA13 will be any different from the industrial land owned by RHL. That is topsoil over alluvial gravels which are proven to be suitable for built development with standard geotechnical design. The site is not subject to any natural hazards other than requiring a flood hazard assessment.

## **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 land within FDA13 has the appropriate transportation connections for an industrial environment. The land has frontage to Seadown Road, identified as a Principal Road in the PDP, and although a limited access highway, has frontage to SH1. The land within FDA13 that is owned by RHL is able to be accessed from SH1 via the existing industrial crossing. There is also an industrial crossing from Seadown Road in the existing RHL site that would lead into the FDA13 land.

## **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 land within FDA is used entirely as rural land, both in terms of primary production and rural lifestyle living. A proportion of the land that RHL has purchased within FDA13 was used historically for horse breeding and training being in close proximity to the racecourse.

See attached map.

**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.*

*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.*

The site does not incorporate or adjoin any of the values in (a) to (c) above. It adjoins an existing industrial area and roading network, which are not incompatible. There are no additional standards proposed for this FDA. The GIZ provisions are considered appropriate for this FDA area (subject to RHL's submissions on those provisions).





28.5 ha RHL owned

4.98 ha under contract to RHL

33.48 ha RHL owned and under contract