

MEMORANDUM REPORT: PTDP – Hearing G – Response to RFI

To: Timaru District Council
Submitter: Thompson (North Meadows 2021 Limited) **Submitter 190.1**
From: Davis Ogilvie (Aoraki) – Glen McLachlan
Date: 20 February 2025
Subject: Response to preliminary s42A report for Hearing G - Growth

1 INTRODUCTION

The purpose of this memorandum is to reply to Council's preliminary s.42A report in relation to Hearing G - Growth. The short s.42a report requested further information be supplied to Council to address the planning framework, servicing considerations, environmental values and site-specific matters.

2 BACKGROUND

2.1 Submission

Our client's submission requests that 236 Meadows Road (the "site") is rezoned from General Rural Zone to General Industrial Zone (GIZ).

As noted in the submission, adjoining properties located between the site and Aorangi Road also have existing industrial land use consents (102.2021.87), currently owned by B G Property Limited and Ladbrook. Furthermore, Council's waste water treatment ponds (WWTP) are located to the east of the site, along Aorangi Road. The original submission also pointed out that in our opinion it is would be logical for Council to consider rezoning this facility to GIZ too. This would subsequently align with the southern WWTPs which are currently zoned Industrial H under the operative plan, and proposed for General Industrial zoning under the PTDP. Our understanding is that the infrastructure activity of the WWTPs would better fit with an underlying GIZ zoning than a General Rural Zoning, providing Council with a better consent planning framework on their land.

Importantly, since the original submission was lodged, North Meadows 2021 has obtained a land use consent (102.2023.136.1); for the establishment of an industrial activity located at 236 Meadows Road, Washdyke. Please refer to the approved site plan in **Figure 1** below.



Figure 1 – Approved Site Plan (RC 102.2023.136.1)

This consent covers approx. 10ha of the submitter's site underlying property (total being 25.7ha), which is also subject to a current subdivision. The subdivision consent was granted on the 19 January 2023 under consent 101.2022.205. Council have approved pursuant to s223 the subdivision giving effect to that consent. Please refer to **Figure 2** below showing the Land Transfer Plan LINZ ref: LT 592983.

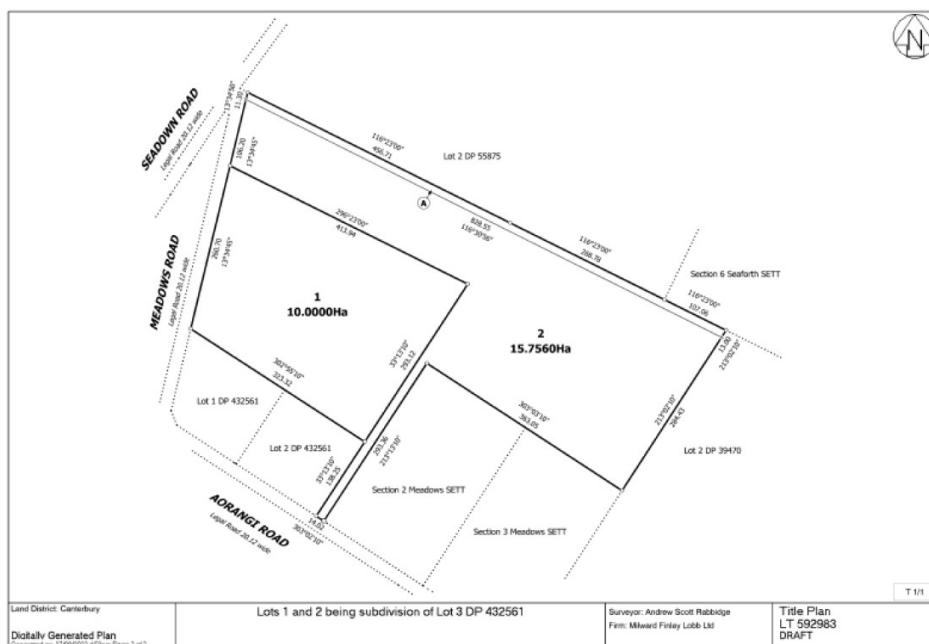


Figure 2 – Subdivision Land Transfer Plan (LT 592983) of the Site

To provide resilience and future capacity for the WWTP it is understood that Council are considering securing a strip of land approx. 180m wide adjacent the west edge of the existing WWTP on the north side of Aorangi Road. In the instance that a pragmatic solution is taken to create a contiguous 'GIZ' of all the land between Aorangi Road and the line of northern boundary of 236 Meadows Road, including the Council land (and say an appropriate designation for Councils intention to extend the WWTPs is included), then it should be considered that any land required for Council infrastructure purposes would not be anticipated as Industrial land available to the market. Therefore in reality the area of proposed GIZ that would potentially be considered 'useable/available' for future Industrial development is actually only 16 ha, please see **Figure 3** below.



Figure 3 – Image showing 16 ha of effective 'useable' proposed GIZ area

3 PLANNING FRAMEWORK

3.1 National Policy Statement: Urban Development

Timaru District Council, as a Tier 3 Council, must still plan for urban growth in a way that avoids unnecessary barriers to development under the requirements of the NPS-UD. Urban growth is considered to include residential, commercial and industrial zoned land.

In accordance with our online meeting, 17 December 2024, with the Property Economics (PE) and Mr. Matt Bonis, we presented a brief high level assessment of Industrial development (consented or built) in the Washdyke area alone. This demonstrated that in the past 10 years approximately 90 ha of Industrial land had been taken by the market. While this assessment only looked at the Washdyke area it indicated that given the local context, matters such as: type of industry, large footprint buildings (bulk storage), hold/lease only supply, land holding ownership and other factors, along with general demand for industrial land, all heavily influence market conditions and that demand or need is potentially higher than accounted for in growth predictions. We understand Council have engaged PE to undertake a review of the earlier 2021 PE Report.

Given that at least 90 ha has been developed in the past 10yrs and that only 202 ha is forecast as needed by 2048, it begs the question if applying a jobs to floorspace to land assessment is the correct method/model in our local context.

It is also worth PE considering further interviews with local industrial leaders, particularly in the WIEZ area, in order to gauge a feel for lost opportunity over the past 10yrs. Anecdotal evidence has seen many industries looking to set up in Timaru/Washdyke only to move onto another region due to suitability of site not being shovel ready (historically, the planning framework and/or lack of planned infrastructure has constrained development).

In regards to NPS-UD please also refer to the attached brief planning advice memo prepared by Novo Group, attached as **Appendix 1**. Giving this consideration and for context of what is being sought with this submission, as outlined above the request will provide for potentially only 16 ha of additional 'available' Industrial (GIZ) land, this additional land will help support:

- Councils obligation of providing 'at least' sufficient development capacity;
- Enables a variety of sites that will be suitable for different business sectors to meet needs in both location and site size;
- Provides additional capacity to help with maintaining a competitive development market;
- It is understood that the site is resilient to anticipated climate change, being clear of both the coastal erosion and sea water inundation overlays modelled on the PDP;

The location of the submission site sits between consented industrial sites and Council infrastructure (WWTPs), therefore in our opinion the site would not be considered 'out-of-sequence' in terms of planned land release and provides a natural progression of the urban environment north and west of existing development/zoned land. The site fills a gap in land use activity that will potentially help with coordinating infrastructure planning and funding decisions in the vicinity of Aorangi Road and Meadows Road, which are already considered for Industrial purposes.

As demonstrated in the recent Land Use Consent, the site is able to connect into existing infrastructure which includes Council accepting out of zone wastewater (in this instance, via low pressure pumped sewer). This can be mitigated by rezoning of the site and surrounding land, ensuring Council can appropriately design and fund any upgrades required.

3.2 National Policy Statement: Highly Productive Land

As the subject site has a proposed rural zoning and includes areas of LUC 2 and 3 classified soils, regard must be had towards the NPS-HPL if the site is to be rezoned through the District plan review.

Importantly we note that through the Land Use consent process, it has been determined that the site is able to be developed for Industrial Activity as noted in the Officers Report:

In conclusion, having reviewed the findings of the Ford Peer review, I am satisfied that the proposal passes all three tests of the HPL in relation to clause 3.10, and therefore consent may be granted to use the land for the proposed purpose which is not rural production but is instead an industrial activity.

It is noted that subsequent assessment under Clause 3.6 (4)(c) may be required to support the rezoning if the Author is not able to rely on the assessments and peer reviews undertaken to date.

As such, our client wishes to retain the right to respond to NPS-HPL considerations until review of the full s42A Report to better understand Council's appetite to rezone the subject land under the District Plan review process.

3.3 Canterbury Regional Policy Statement

Growth Rezoning / Amendments to SCHED-15:

The subject site is not subject to an FDA overlay. The site, and the surrounding area are predominantly subject to existing consented Industrial activities which would sit better with an underlying Industrial zoning.

The site was subject to assessment under “Chapter 5 – Land use and Infrastructure” as part of obtaining Land Use consent. This assessment is considered sufficient for the purpose of the rezoning request for the site. Further built form is anticipated to be subject to the same or similar criteria. Nevertheless, it is worth emphasising the obvious that the site sits in excellent proximity to significant district infrastructure such as Councils waste water treatment plant along with being adjacent to or having access to other key infrastructure in the vicinity of the site (Roading, Water, Power etc.). Please refer below in **Section 4** regarding servicing considerations.

As mentioned previously, should the rezone be considered for the wider site it will only leave approximately 16 ha of unconsented, or undeveloped land sandwiched between existing Industrial (non-rural) activities. It is considered that the proposed request aligns well both individually and in combination with the areas identified in the PDP to promote a coordinated pattern of development, this is accentuated by the existing and consented environment. Given the uptake and demand for industrial sites we have seen over the past 10 years it is considered highly likely that the additional 16 ha would be utilised/developed within the life of the PDP, however in any case we reserve the right to further respond to ‘capacity’ following the updated assessment being completed by Property Economics.

Energy Efficiency:

Given the built and consented environment, the site sits within what could be considered existing ‘urban form’, therefore meets the requirement of maintaining this form and resulting in anticipated traffic/trip movements commensurate with that expected urban form.

Natural Hazards:

The subject site is within a Flood Assessment Area under the PDP, as is most of Washdyke and the larger district. Consented built form has been (or will be) established in accordance with ECan requirements. Any future built form will be subject to approval by Council.

The site is subject to an overlay for “Flood Assessment Area”. It was noted in the Application for Land Use consent that: *A **Flood Hazard Assessment (FHA)** was carried out by ECan in June 2022 with respect to subdivision consent 101.2022.205 (**Appendix 6**). The **FHA** concludes that flood risk at the site is very low.*

The site is resilient to anticipated climate change, being clear of both the coastal erosion and sea water inundation overlays modelled on the PDP, furthermore the ECan Flood Hazard Assessment Report, noted that the site is not expected to experience coastal inundation or erosion hazards over the next 100 years, even when considering high sea-level rise predictions. Overall, the flood risk to this property is considered very low.

4 SERVICING CONSIDERATIONS: SELWYN CHANG, PRINCIPAL CIVIL ENGINEER

4.1 Service Provision & Infrastructure Integration

Roading network

The site was subject to a Traffic Impact Assessment through the Land Use consent. The Officers report concluded:

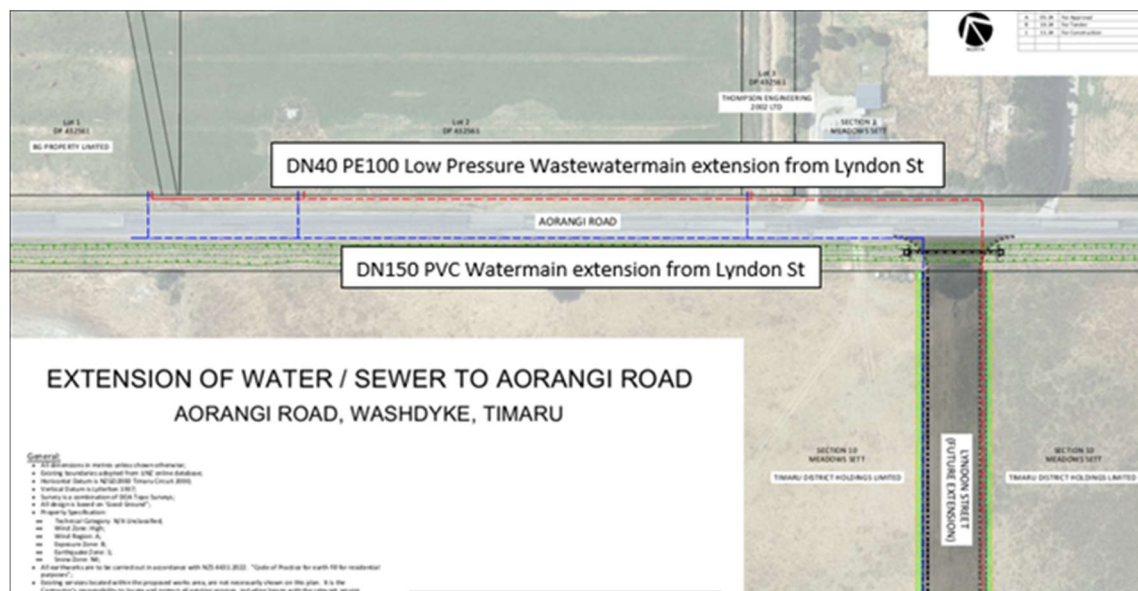
The Integrated Transport Assessment (ITA), and engineering assessments provided with the application, and subsequent peer reviews demonstrate that existing roading is sufficient to service the traffic demand of this development.

As Aorangi Road is already associated with Industrial activity to the east (Wastewater ponds and treatment plant, Dog Pound, Aorangi Fellmongery) and the Industrial Expansion Zone to the south, it is considered there are no additional affects being created by the rezoning of the land on the north side of Aorangi Road in relation to traffic and energy efficiency.

Portable Water Supply

There is nearby DN150 PVC public watermain being constructed under Engineering Approval (EA 63.2024.5.1) along Lyndon St and Aorangi Road which will be close to service the proposed site.

The extension of the network should have sufficient capacity to deliver the required urban level of service to the proposed development.



Wastewater

There is nearby DN40 PE100 low pressure sewermain being constructed under Engineering Approval (EA 63.2024.5.1) along Lyndon St and Aorangi Road which will be close to service the

proposed site. The wastewater treatment plant is located approximately 0.8km east of the proposed site.

Subject to the growth/demand in Washdyke Industrial Expansion Zone, there is potentially insufficient capacity in the low-pressure wastewater network. To mitigate this a new low-pressure wastewater pipeline or suitable alternative will be required whether to the wastewater treatment plant or pipeline, however in any case the site is within 1km of the WW treatment plant therefore is considered feasible to service the site.

Trade waste

There is no trade waste sewer in vicinity to the site, and at this stage the submitter does not envisage requiring a trade waste connection is necessary. That said, Council is considering installing a trade waste pipe to service the northern portion of the Washdyke Industrial Expansion Zone (WIEZ) area. Subsequently given the sites proximity to both the treatment plant and the northern portion of the WIEZ, it is considered that trade waste could be a viable option should it be considered necessary.

Stormwater

There is no public stormwater network in vicinity to the proposed site. Seadown Drain No.2 (Flood Bylaw Drain) is just adjacent north of the proposed site and Seadown Drain No.2B (Flood Bylaw Drain) traverses NE across the site.

It is anticipated the site will have its own stormwater management system that will manage the post-development stormwater runoff.

Subject to the ground conditions, it is likely that the proposed site could be suitable to discharge stormwater to ground and/or to the drain(s). Therefore, the proposed site will require discharge consent from ECan to be obtained.

Electricity

Alpine Energy has confirmed the site can be serviced.

Telecommunication

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

4.2 Hazards Information

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.

Flood Hazard Assessment

Ecan has provided Flood Hazard Assessment for the site on 21 June 2022. The site and its surrounding area are prone to localized runoff flooding, particularly during high-intensity, short-duration rainstorms (typical of summer thunderstorms) or prolonged, lower-intensity rainfall events. ECan has noted that low-lying areas, such as depressions and swales, which may represent historic flow paths, can collect runoff during these events, resulting in deeper flooding in these areas.

According to the ECan Flood Hazard Assessment Report, the site is not expected to experience coastal inundation or erosion hazards over the next 100 years, even when considering high sea-level rise predictions. Overall, the flood risk to this property is considered very low.

5 TRANSPORT NETWORK INTEGRATION

The proposed site/development will potentially access road frontage from both Meadows Road and Aorangi Road.

Meadows Road is anticipated to be designed and constructed to industrial road standard. As part of the land use consent granted for the site, the applicant is required to pay a financial contribution towards Meadows Road upgrades.

Aorangi Road is anticipated to be upgraded to industrial road standard due to future linkage between Washdyke Industrial Expansion Zone (WIEZ) to Aorangi Road via Lyndon Street outlined in the WIEZ Outline Development Plan. Approximately 80% of the Lyndon Street within WIEZ has been (or is currently been) constructed. Development of the WIEZ area fronting Aorangi Road will trigger the need to upgrade Aorangi Road to industrial road standard to accommodate increase traffic and loading from WIEZ.

Therefore, once both Meadows Road and Aorangi Road have been constructed to industrial road standard, it should have sufficient capacity to accommodate the proposed site traffic loading and activities. It is understood that Councils requirements for constructing industrial roads in the WIEZ

area and/or providing for different modal choice includes allowance for both pedestrian and cycle movements, aimed at supporting a safe and efficient transport network.

6 ENVIRONMENTAL VALUES

6.1 Existing environment and characteristics

As mentioned above, the site sits sandwiched between built and/or consented industrial activities. The northern boundary line of 236 Meadows Road when projected west aligns with proposed FDA13 and projected east (to the coast) aligns with the boundary for Councils WWTP, subsequently creating a contiguous and consolidated pattern of urban form/land use activity.

6.2 Environmental Values

The site is identified as having “wāhi tupuna” values, as does the larger Washdyke region. To provide context, wāhi tupuna is considered to mean:

“Broader geographical areas/ cultural landscapes that hold significant value to Kāi Tahu due to the concentration of wāhi tapu or taoka values, or the importance of the area to cultural traditions, history or identity.”

In regards to the Land Use Consent gained for “the site”, Aoraki Environmental Consulting Limited (AECL) were consulted and a letter confirming that they were satisfied with the proposal and did not believe the development and operation of the site would adversely affect the values Rūnanga hold. Any future built form would create an opportunity to further consult with AECL, and it would be anticipated that an Accidental Discovery Protocol condition would be imposed on any relevant consents.

The site has historically been cultivated rural farm land, with no known specific values associated with landscape and natural character, biodiversity constraints, cultural and/or heritage values (noting AECL consultation). Therefore it is considered that there are no site specific features or attributes that should be retained through subsequent subdivision, use or development requiring specific additional standards, rules or methods not covered within the plan.

7 SPECIFIC MATTERS AND CONCLUSION

This memorandum responds to Timaru District Council’s preliminary s.42A report for Hearing G - Growth. It provides additional information regarding the planning framework, servicing considerations, environmental values, and site-specific matters related to the proposed rezoning.

7.1 The request / Submission

The submission seeks to rezone 236 Meadows Road from General Rural Zone to General Industrial Zone (GIZ). However as outlined in the original submission, it is logical that Council consider rezoning to GIZ all the land between Aorangi Road and the line of the northern boundary of 236 Meadows Road, creating a contiguous and coordinated pattern of development. The main reasons for this are:

- The consented and/or built environment on adjoining properties east, south and west of the site are already industrial in land use, with Council's wastewater treatment ponds (WWTP) located adjacent the site;
- Rezoning the WWTP land to GIZ would provide a more appropriate planning framework for Council in the future;
- A land use consent (102.2023.136.1) has already been granted for industrial activity on 10ha of the site;
- Council is considering securing 180m of land west of the WWTP for future resilience, reducing the effective available industrial land under this request to only 16ha approximately.

7.2 Planning Framework

National Policy Statement: Urban Development (NPS-UD): Supports rezoning as it aligns with urban growth needs and industrial land demand.

National Policy Statement: Highly Productive Land (NPS-HPL): Requires further consideration, but prior land use consent indicates industrial activity is viable.

Canterbury Regional Policy Statement: The site is not subject to an FDA overlay, and among other things existing industrial activities support rezoning.

Infrastructure Considerations: The site is in proximity to key infrastructure, including roading, water, power, and wastewater treatment facilities, facilitating industrial development.

Natural Hazards: The site has a low flood risk and is outside coastal erosion and inundation overlays.

7.3 Servicing Considerations

Roading: Traffic Impact Assessment concluded no additional adverse effects. Aorangi Road and Meadows Road will be upgraded to industrial standards as part of other planned, zoned or consented activities.

Water Supply: A DN150 PVC public watermain is under construction and will adequately service the site.

Wastewater: A DN40 PE100 low-pressure sewer main is being installed nearby; additional capacity may be needed.

Trade Waste: No current trade waste sewer, but future Council installations may provide options.

Stormwater: No public stormwater network; site will require its own stormwater management system and ECan discharge consent(s).

Electricity & Telecommunications: Site can be serviced by Alpine Energy and telecommunication providers.

7.4 Transport Network Integration

- Site access from Meadows Road and Aorangi Road is available.
- Upgrades to Meadows Road and Aorangi Road to meet Councils industrial roading standards are anticipated to occur even without the proposed rezoning, subsequently providing an efficient transport network fronting the site.
- Future road upgrades and development within the site are anticipated to incorporate pedestrian and cycle provisions, connecting to the wider network subsequently facilitating modal choice.

7.5 Environmental Values

Existing Environment: The site is surrounded by consent or operational industrial activities, supporting a contiguous urban form.

Wāhi Tupuna: Consultation with Aoraki Environmental Consulting Limited confirmed no adverse effects on cultural values; future development is anticipated to require consultation with AECL and consenting to include an Accidental Discovery Protocol condition.

Site Characteristics: Historically used as farmland, with no significant landscape, biodiversity, or heritage constraints.

It is therefore concluded that the proposed rezoning aligns with industrial land demand, infrastructure availability, and planning objectives, making it a logical and feasible extension of industrial zoning in Washdyke.

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.

8 ATTACHMENTS

- Appendix 1 – Novo Group – Planning advice on NPS-UD

19 February 2025

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Novo Group Limited
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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

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