

**SUBMISSION BY MR LEO MOODIE AND MRS JUDITH MOODIE ON THE TIMARU DISTRICT
2045 DRAFT GROWTH MANAGEMENT STRATEGY**

To Timaru District Council
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Submitter Details

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Hearing

The submitters wish to be heard in support of their submission.

Specific provisions that this submission relates to

The submission relates to the Timaru District 2045 Draft Growth Management Strategy as it relates to the provision of land for industrial growth within the Washdyke area.



Fred Coughlan

Planner, Davis Ogilvie & Partners
For and on behalf of the submitter(s)

Introduction

1. This submission has been prepared by Davis Ogilvie and Partners on behalf of Mr. Leo Peter Moodie and Mrs. Judith Ann Moodie (the submitters).
2. The submitters own a parcel of land which is currently zoned as mixture of Rural 1 and Rural 2 under the Operative Timaru District Plan. The parcel of land is located at 236 Meadows Road Road being 25.75 hectares in area and is legally described as Lot 3 DP 432561. The subject property is shown in **Figure 1** below.



Figure 1: Subject property

Scope of the submission

3. This submission relates the submitter's property with regard to the proposed Draft Growth Management Strategy (GMS) as it relates to the provision of Industrial land within the Timaru Region.

Nature of the submission

4. It is the submitter's position that the existing Rural 1 and 2 zoning of the subject land does not reflect the prevailing land use change and ongoing commercial/industrial development within the surrounding area.

5. The submitter's consider the current policy direction of the GMS, which seeks the retention of this zoning will result in increased uncertainty, and unnecessarily onerous, prescriptive and/or complicated requirements for the expansion of commercial/industrial activity within the Washdyke Industrial area.
6. The submitters hold this position based on the following factors:
 - a. Timaru is currently experiencing significant growth with regard to port activities, food production/processing activities, road transport and construction activities corresponding with this growth.
 - b. The above growth is recognised by the recent report prepared by TDC, being the Timaru Economic Development Strategy 2015. This report focused on growth and development within the region through to 2035. The outcomes of the report, which seeks creation of 300 jobs per year (6000 by 2035) – primarily in those industries outlined above seems at odds with the growth estimates outlined in the GMS. Provision of this level of employment will require a significant area of a suitable zoning for these primarily industrial activities.
 - c. The existing provision of industrial zoning (both vacant and deferred) is considered insufficient to maintain sufficient land supply for growth of the region, with only approximately 103ha of Industrial land (70ha vacant, 33ha deferred) provisioned for industrial activity. In addition to the issue of ongoing land supply, the submitters consider the concentrated ownership of the parcels of existing and/or deferred industrial land within the Washdyke area is having an anti-competitive effect on development within the area. It is considered that the introduction of new industrial land would dilute ownership within the area to allow increased for increased competition within what is a limited market.
 - d. The submitters believe that the location of their property on the northern boundary of the existing Washdyke Industrial Expansion Zone means that it is in a position to provide for natural expansion of the Washdyke Industrial Area. The property is serviced by the existing road network (Meadows Road, Aorangi Road) and is located in an area of low residential and/or rural amenity with existing industrial activity prevalent in the surrounding area and the TDC wastewater facility located directly adjacent to the East of the area. The subject property is well located with regard to existing servicing, with the TDC water mains terminating approximately 700m to the south of the property and the Temuka main trunk sewer located along the northern edge of the property. Furthermore, the locality is an environment with little potential for reverse sensitivity effects, often a significant limitation with regard to industrial land and activities resulting in adverse noise effects or obnoxious smells. These attributes are recognised in the Options Report

prepared by Council, with the subject properties identified as well suited to commercial/industrial zoning.

- e. As the GMS is to be a significant policy driver for the Replacement District Plan process the submitters believe that consideration of further commercial/industrial land supply will reduce future uncertainty, costs and process for both Council and commercial entities alike.
- 7. The submitters seek that the GMS consider the provision of further Industrial land within the Washdyke area, specifically in relation to the subject property in order to provide for future commercial/industrial growth and development in the region in a manner that meets the objectives of the both the GMS and Timaru Economic Development Strategy.
- 8. Currently the GMS outlines the following with regard to Industrial land supply:

"It is considered that the Replacement District Plan should not identify any additional land be rezoned for industrial purposes. Given the extent of vacant and available industrial land for both light and heavy industrial uses, additional rezoning promotes neither an efficient nor effective use of the existing industrial land resource, nor would provide a coordinated approach to integrating land use and infrastructure. Longer term, and subject to considerable changes in demand additional industrial land could be developed in several locations at Washdyke to cater for substantially increased demand for both light and heavy industrial land uses." (Timaru District 2045 Draft Growth Management Strategy)

- 9. It is considered by the submitters, with regard to the above, that a balance can be struck in the provision of further industrial land through the implementation of a deferred type zoning for growth areas within the Timaru Region. This would require the development of Outline Development plans for growth areas. These would stipulate infrastructure staging and the responsibility of developers in terms of the provision of infrastructure within the deferred zoning, the subject properties have the advantage of close proximity to existing infrastructure as outlined in (d) above.
- 10. The GMS further states:

"An agile planning and infrastructure framework remains important. Forecasted trends in demand do not always account for industry specific demands and associated infrastructure servicing. Accordingly, District Plan policy, and associated financial contributions policy should be sufficiently agile to account for activity specific demand, whether this is an expansion at Clandeboye, or accommodating a specific manufacturing or logistics project at Washdyke." (Timaru District 2045 Draft Growth Management Strategy)

11. It is considered that the identification of Industrial land for further growth under a deferred zoning type arrangement is a practical response to providing contingency for future growth and agility with managed infrastructure cost sharing without requiring the onerous, costly and time consuming exercise of either a private or Council led plan change to address such shortages in the future. The zoning would also provide certainty to commercial interests seeking to establish activities within the zone.

Relief sought

12. For the reasons outlined above the submitters seek that their property is identified by the GMS as an area for Commercial/Industrial growth within the Timaru Region.

DATED this 16th day of May 2017.