

**SUBMISSION BY GLEN MCLACHLAN ON THE TIMARU DISTRICT 2045 DRAFT GROWTH
MANAGEMENT STRATEGY**

To Timaru District Council
Address 2 King George Pl, Timaru Central, Timaru 7910
Email gmssubmission@timdc.govt.nz

Submitter Details

Full Name(s) Glen McLachlan
Submitter Agents Name Davis Ogilvie (Aoraki)
Contact Person Glen McLachlan
Address for Service PO Box 359
Timaru 7940
Email glen@do.co.nz
Phone number (03) 688 8350

Hearing

The submitter(s) wish to be heard in support of their submission.

Specific provisions that this submission relates to

This is a 'general' submission relating to the Timaru District 2045 Draft Growth Management Strategy (GMS).



Glen McLachlan

Director, Davis Ogilvie (Aoraki)
For and on behalf of the submitter(s)

Introduction

1. This submission has been prepared by Glen McLachlan of Davis Ogilvie (Aoraki), as a general submission on the Growth Management Strategy (the submitter).
2. The submitter is a local owner/operator of a Planning, Surveying and Engineering consultancy business (Davis Ogilvie Aoraki Ltd). A Licensed Surveyor with more than 15 years post graduate experience, holding a Bachelor of Surveying (Honours) and full member of the New Zealand Institute of Surveyors.

Scope of the submission

3. This is a '**general submission**' as to provide comment on certain fundamentals and opinions that the submitter has in regards to the proposed Draft Growth Management Strategy (GMS) as it relates to 'growth' within our District and more particularly the Timaru Region.

Nature of the submission

General:

Conservative growth predictions

4. It is appreciated that under the National Policy Statement on Urban Development Capacity (NPS-UDC) Council have an obligation to use Census data as a source of analysing growth predications and that this has to be weighed up against managing infrastructure costs to Council. That said, the submitter notes that the GMS largely draws from source information/data that pre-dates 2013, albeit by linear extension (NZ Stats/census/building consents). Port of Tauranga only brought Timaru Primeport in 2013, therefore Business and Industry growth stimulated from having confidence and established/secure shipping lines has only started to be felt in the past 3 years. There is significantly more confidence within our district now that Port of Tauranga is operating Primeport Timaru *e.g. during the tightening economic situation of the dairy down turn in 2016, our district still experienced >20% increase in dwellings/building consents (263 for the year) as well as 146 more commercial/industrial consents than in 2015 (which was 1155 for the year).*

The submitter would like to be certain that Council have taken into account the Ports forecast data, or sufficiently consulted with Port of Tauranga and not just local Primeport representatives. This is to ensure nothing in terms of big picture forecasting is missed.

5. Actual development over the past 3 years could have also been greater should 'zoned' industrial land have been 'shovel ready'. Shovel ready means having the likes of appropriate consents in place (e.g. stormwater discharge), as well as appropriate outline development plans (ODP) for

planned and staged infrastructure development. It is noted that Council is in the process of addressing this matter within the Washdyke Industrial Expansion Zone which is to be commended. The point is that there is a significant lag time to create shovel ready zoned land and from discussions with two significant land owners in the WIEZ area, more of the 'available' Industrial land would have already been utilised prior to the GMS being released, had the situation in Washdyke have been more advanced.

The submitter would recommend Council discuss/gauge the lost opportunities over the last 3 or so years with significant land owners in Washdyke (such as Rooney's, Thompsons, and Hilton Haulage) and factor that into the growth forecasting.

Consultation/collaboration

6. Within the Timaru District 2045 GMS, page 25, it indicates that consultation has taken place with key stakeholders. However it is the submitters opinion that other important stakeholders that understand the uniqueness and drivers for our District have not been adequately consulted with for example (but not limited to):
 - Surveying/planning consultants/property experts in our region
 - Significant business operators (e.g. Port of Tauranga, Fonterra),
 - Transport/logistic companies,
 - Local real estate agents & Valuers,
 - Hunter Downs Irrigation,
 - Building companies/master builders, and
 - Property law society
 - Immigration New Zealand
7. Furthermore it is the submitter's belief that the general public are 'too busy'/can't be bothered, do not understand what this document means or how it might affect them, and do not have anyone advocating for them. Many people only realise the implications once they want to do something with their land and have to deal with the rules within the District Plan. Subsequently what follows are complaints to Council/us that the plan is 'too restrictive' and doesn't provide for the needs of the community. Council have completed what one would normally expect in advertising the document, through the paper and over the radio as well as providing for 'drop-in' sessions. However most people will not have downloaded or read the hundreds of pages of information. Ironically, even many of the stakeholders and persons outlined above are currently 'busy' at the moment due to a strong local economy and amount of development occurring in the region. In addition; the timing (School holidays), submission feedback period and lack of media coverage (paper articles to stimulate public discussion) of the GMS will likely result in Council receiving only a small cross-section of 'specific' submissions.

8. For such a critical document that sets the 'blue print' for our District over the next 30 years the submitter believes further public engagement is required if not only to gather further updated evidence of growth and perspective from other key stakeholders.
9. The CBD working group sessions are a really good example of Council actively consulting with the right people, Council should be commended on this! Therefore it is suggested that prior to the GMS going through the 'formal' hearing process, further targeted engagement and information gathering should take place. The more time spent at the front end will result in more robust outcomes and less time in formal hearings, saving costs in the future (see further comments below).

Include more proposed 'deferred' zones to de-risk the District Plan

10. A District Plan by nature is a document that cannot be changed easily. To do so requires full public consultation which is extremely time consuming, resource hungry and expensive – certainly not 'agile'. The GMS and District Plan review are obviously going through a full public consultation process at present, therefore the time should be taken now to minimise potential plan changes in the near future. It is the submitter's opinion that Council have already assessed/considered many of the more appropriate 'options' for re-zoning/growth within the Options Report. Based on these assessments plus additional discussions with relevant stakeholders, the submitter believes Council should be including more deferred zoning areas (mainly Residential, Rural Residential and Industrial) to ensure that the District Plan is sufficiently 'agile' to respond when demand requires. Suitable wording could be included within the new District Plan that makes the deferred zoning areas subject to Outline Development Plans (ODP) and suitable Infrastructure Servicing Provisions (IPS).
11. Like a business plan the GMS shapes the way our region can grow or react to demand. Limiting growth options will constrain the Districts economic wellbeing. It is considered that the identification of 'deferred zoning areas' is a practical, planned and sustainable response to ensure contingency for future growth and agility with managed infrastructure cost sharing.

Council take a proactive role

12. The submitter believes TDC or TDHL (property arm) need to take a more proactive role in securing Industrial and/or Commercial land for future development. This will enable Timaru to compete with neighbouring Districts such as Ashburton, Mackenzie & Selwyn in order to facilitate economic growth within our region. Importantly, none of these other District have a Port!!! A Port is a significant benefit to our region and we should be encouraging development that has synergies with the Port.
13. This proactive approach may also be in the form of public/private partnerships. Essentially Council (or subsidiaries there-of) providing a platform or pathway for planned infrastructure provisioning

ensuring shovel readiness. This could connect businesses looking to move to our region with local developers to enable growth (particularly trade waste industries to utilise infrastructure).

14. The purpose of this submission was to address mainly general matters that are fundamental to growth or forecast growth in our District. Ultimately once the GMS is adopted the shape of the District Plan is set, subsequently the submitter has a strong view that more consultation should take place prior to hearings. Proactively seeking engagement is a large part of achieving robust outcomes. Discussion below on other more specific planning related aspects should be part of future engagement, however are briefly covered;

Transport

15. Transport, traffic management and 'long term' future planning is critical to successful town planning and economic growth. While there are many locations and considerations in an overall Timaru traffic assessment, the submitter would like to table for Council's consideration some options for long term traffic links within the North Washdyke area. Some of the options have been established from consultation primarily with Hilton Haulage (Mr Peter Anderson – who also acknowledged historical ideas/discussions from Mr John Milward). Attached to this submission please find a conceptual layout for discussion purposes only. In short; Options 1 and 2 provide the best conceptual fit with Plan Change 14 as they do not require any additional rail crossing. However the submitter does not intend to detail each specific option here, as it is considered that this be part of further consultation and Council engagement with key land owners, businesses and stake holders in the Washdyke area.
16. The reason the submitter strongly advocates for stake holder engagement is that interest has been shown from some of the key stake holders being willing to partner with Council to investigate, plan and potentially construct roads which resolve issues associated with their operations and provide long term benefits (such as financial efficiencies).

Industrial

17. The submitter seeks that the GMS consider the provision of further Industrial land within the Washdyke area, specifically in relation to areas north of the existing Industrial or deferred zones, 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.
18. 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)

19. 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)

20. It is considered by the submitter, 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 (ODP) for growth areas. These would outline infrastructure staging and the responsibility of developers in terms of the provision of infrastructure within the deferred zoning.

21. The area directly north of the current or deferred zoning areas is in close proximity to existing infrastructure and main traffic links (see indicative area outlined in figure below).



22. This area and more particularly the area east of Meadows Road also has the following attributes which lend itself to future Industrial development:
- The area would be contiguous with existing Industrial zoned land to the South
 - Councils waste water treatment ponds lie to the east, therefore heavy Industrial land is well suited to being a neighbour
 - While the land may change from primary produce production, it would be providing for the Districts economic wellbeing by being productive Industrial land
 - Less than minor 'reverse sensitivity' effects as there are only a limited number of existing dwellings
 - The area is not known to be subject to flooding and/or coastal inundation hazards
 - Providing additional options and choice is beneficial for new businesses looking to come to our region and keeps land values competitive
 - These aspects are well supported as the areas outlined as 'Aorangi Road' and 'Seadown Road' subsequently scored well in Councils Options Report.

Residential

23. As stated earlier the submitter strongly disagrees with the growth predictions used. The main influencing drivers to our District have changed Timaru's potential growth horizon significantly in the last five year; namely the Port of Tauranga buying into Primeport (2013) and Irrigation (proposed or developed) benefiting primary production. Timaru has a significant rural catchment area. Many of the recent or proposed developments within our region are either only just starting to have an effect or are yet to be felt. The submitter considers Councils growth modelling does not take this into account therefore increasing the risk of under estimating growth and limiting development of our region.
24. On balance the submitter does generally agree that Councils 'Options Report' was considering development in the most logical locations (albeit subject to further consultation and individual submissions). However the GMS has taken somewhat of an optimistic view to the likes of allotment/dwelling yield and a pessimistic view to growth. This results in a double edged sword effect that has the potential to grossly under estimate growth and constrain our region.
25. If Industrial and business growth is encouraged within our region, a strong local economy leads to strong residential growth. From news within the last two weeks (Fonterra) and other recent discussions with clients of the submitter, more than 150 jobs are needed, and that is just taking into account a few entities. This highlights how quickly things can change, subsequently the submitter requests that Council include further data on the 'current' needs within our District to ensure growth modelling is more accurate.

26. The growth forecast modelling assumes an aging population, however businesses still need to employ replacement staff for retiring workforce. Has Council factored into the growth modelling replacement workforce (i.e. this is likely to result in persons migrating into the district in order to maintain a workforce).

Residential allotment/dwelling yield

27. It is unrealistic to consider that the existing available in-fill areas and Greenfield areas can be brought on-stream within a reasonable timeframe to keep up with demand. District Plan zoning needs to provide sufficient options, areas and locations to enable development to respond better to demand. Council should consult with some of the main house building companies to appreciate the cost, limitations in choice and lag time in realising available land to build on. Part of this issue is down to the land available to develop (i.e. its location and viability).
28. An optimistic view to infill development has been assumed. People have to want or need to subdivide. Densifying their property may often be in conflict with the reason they brought their property in the beginning (not to say it won't ever be developed, just that it can't be assumed that the land available for infill development will actually be developed in the short term).
29. Any development must be financially viable to develop. The submitter considers Council have been optimistic in their assessment of the amount of development that might occur in less desirable or marginal areas. Land may be vacant or could provide infill development, however if the allotment(s) are not viable to bring to market the development of this land will simply not occur. That is why much of the land considered as available stock has sat undeveloped for so long.
30. In Greenfield areas (e.g. Gleniti Res 6 zone), the allotment yield is likely to be significantly less than Council has allowed for. With the exception of flatter topography areas, lot sizes average around 900m²-1000m². Sloping topography, roads and reserve areas (incl. stormwater swales and attenuation areas) require a significant amount of land area, resulting in up to 30-45% of a Greenfield site being lost to non-dwelling/allotment area. This should be accounted for in Council's yield assessment.
31. Council should ensure limitations on fragmentation of 'greenfield' land zoned or deferred zoning areas should be maintained in larger blocks to enable better co-ordinated and staged development.
32. The submitter considers the current policy direction of the GMS which seeks limited to no residential re-zoning will result in increased uncertainty, and unnecessarily onerous, prescriptive and/or complicated requirements for the expansion of residential zones. Similarly to the comments made above, the GMS should make allowance for further deferred residential and rural residential zoning areas to mitigate the risk of under estimating growth in our region.

33. The submitter considers further consultation needs to occur with property experts (e.g. local planning/surveying consultants, real estate agents and valuers) with regards to Rural Residential demands and zoning provisions. The other associated aspect that needs to be addressed is farm succession planning, i.e. allowances to facilitate limited subdivision in the rural/productive areas so that retired farmers can remain on their farm while the next generation is transitioning.

Summary

34. The submitter holds 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 activities 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 (and spin off residential requirements).
 - c. The existing provision of Industrial, Residential and Rural Residential zoning (both vacant and deferred) is considered insufficient to maintain land supply for growth of the region. Through the inclusion of more recent data and Council engagement with existing zoned land owners a better understanding of available/developable land will be obtained.
 - d. Additional re-zoning or deferred zoning areas should be allowed for to provide growth options in our region. Expensive and time consuming private or publically initiated plan changes to react to growth in the short to medium term should be avoided.
 - e. Due to the time available, timing of feedback period, busy workloads and matters raised above; the submitter believes that Council need to proactively hold further stake holder engagement prior to formal hearings. More current data and context is considered necessary to be factored into the GMS which will then provide a more robust District Plan.

DATED this 12th day of May 2017.



- Notes:
 - All dimensions in metres unless shown otherwise;
 - This plan is a conceptual plan for discussion purposes only. On possible future road network layout/links within the north Washdyke area.
 - Aerial photography sourced from LINZ Data service 11/05/2017. Consortium for re-use under the creative commons attribute 3.0 New Zealand licence
 - Boundary information adopted from LINZ online XML data set 11/05/2017

