

Submission

1.0 Introduction

1.1 Submitter details

This is a submission by Redwood Group (**the submitter**) on the Timaru Proposed District Plan (**the PDP**). The submitter owns the property at 223 Evans Street (Lot 1 DP 553089 and Lot 2 DP 553089) (**the site**).

1.1.1 Submission contact

The contact for this submission is:

Redwood Group

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1.2 Trade competition declaration

The submitter does not consider they could gain an advantage in trade competition through this submission. In any event, the submitter is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

1.3 Hearing options

The submitter does wish to be heard in support of this submission.

The submitter would consider presenting a joint case at the hearing.

2.0 Submission details

2.1 Introduction to submission

Redwood group was founded in 1992 with over 30 years' experience in delivering successful, high-quality developments. Redwood Group has a history of undertaking diverse developments ranging from residential to mixed use, and large-scale retail developments.

Redwood Group acquired the site (former A&P Showgrounds site) in 2021 from Timaru District Holdings Ltd (TDHL). The development of the site as a retail park is currently under construction. The development is anchored by a Bunnings Warehouse, Countdown supermarket, and supported by several local and international retailers, restaurants, gyms, and other service providers.

A TDC initiated plan change to zone the subject site Commercial 2A has been operative since ***. The Commercial 2A zone includes the following maximum thresholds for retail GFA (refer Commercial 2A zone rule 2.2):

- 24,000m² GFA open to the public prior to 1 July 2022
- 29,000m² GFA open to the public prior to 1 July 2025
- 34,000m² GFA open to the public prior to 1 July 2027.

A resource consent was approved in December 2020 (102.2020.91.1) to construct and establish a bulk retail centre including provision of roading, carparking, landscaping and subdivision. The level of development that has been approved is in accordance with the thresholds for the Commercial 2A zone as set out above.

The implementation of this consent and development of the site is well underway with stage 1 of the development including the supermarket and other retail spaces set to open in early 2023. Construction of works for the subsequent stages is programmed from 2023 onwards.

The PDP proposes to zone the subject site Large Format Retail Zone (**LFRZ**) and introduce new provisions restricting retail development on the site.

2.2 Provisions to which the submission relates

The submission relates to the PDP in part.

The submission is on the objectives, policies and a number of the rules of the LFRZ of the PDP.

2.3 Position on the provisions

The submitter opposes the objectives, policies and a number of standards in the LFRZ of the PDP, and seeks that these be amended to reflect agreed and consented (and partially developed) retail thresholds, and to continue to provide for restaurants and cafes. It is also proposed that the provision be amended to provide for residential activities on the land.

Redwood Group otherwise supports the proposed LFRZ zoning (or other equivalent that provides for the intended activities) of the site.

2.4 Reasons for submission

- The subject site has been established as a commercial centre for large format retail, smaller retail and food outlets. The site is adjacent to State Highway 1 with nearby industrial and residential properties. A resource consent has been approved for retail development consistent with the Operative District Plan.
- There is an agreement between Redwood Group and TDHL to develop the site for retail and other supporting activities.
- Following this agreement, and as noted above, resource consent was granted in 2020 to establish a retail development based on the Commercial 2A provisions, including, importantly, the development thresholds. The PDP provisions for the LFRZ are in direct conflict with the resource consent and current agreed development thresholds for the site.

- The proposed extended retail GFA thresholds in the LFRZ set the perception that these are the timeframes under which development will occur. This is not the case, given that a resource consent has been approved for development to occur in accordance with the Commercial 2A operative plan development thresholds. This resource is currently being implemented.
- Restaurants are currently permitted within the Commercial 2A zone. It is not considered appropriate to change the activity status for these in the LFRZ as this is in direct conflict with the commercial agreement, operative provisions and approved resource consent.
- In terms of residential uses, the subject site is located within the urban boundary of Timaru. The site is considered to be suitable for residential development for the following reasons:
 - a) Timaru currently has a documented housing shortage;
 - b) The site will employ approximately 600 number of staff, many of whom will be low-wage workers who would benefit from increased access to affordable housing;
 - c) The subject site is well serviced by transport networks with the site adjoining State Highway 1;
 - d) The site provides good amenity and a positive living environment. The site has been comprehensively developed, including improvements such as public access along the Taitarakihi Creek corridor;
 - e) The site contains a number of retail offerings that are complementary to residential activity on the site;
 - f) Reverse sensitivity effects are not anticipated to occur between the Alliance Group Plant as the railway creates a bund and buffer area that separates and screens the site and adjoining Alliance Group operations; and
 - g) Whilst the site is within close proximity to the railway line, buildings can be designed to mitigate railway noise to an appropriate level for residential development.
- The submitter considers that objectives, policies and rules can be amended or inserted into the PDP to reflect the consented environment, and fully optimise the development opportunities, vision and outcomes it holds for the locality.
- Key amendments sought by the submitter are:
 - (a) Amend LFRZ-S5 to reflect the GFA maximums in the Operative District Plan and consent.
 - (b) Amend LFRZ-R6 to delete PER-1 and PER-2.
 - (c) Delete LFRZ-R12
 - (d) Amend LFRZ-R14 to change the activity status for restaurants from non-complying to permitted
 - (e) Include commercial activities, retail activities, residential activities and food and beverage activities as permitted.
 - (f) Any additional amendments required to support the full development of the site as mixed-use (including retaining the proposed 12m height limit).

The amendments are required to provide for the sustainable management of the Timaru District, thereby achieving the purpose of the Resource Management Act 1991.

3.0 Decision the submitter wishes Council to make

The submitter requests that:

- That the specified provisions of the PDP be deleted or amended to address the matters raised in this submission.
- Should this first relief not be granted, that the LFRZ and associated provisions are deleted in their entirety and replaced with the operative district plan zoning and provisions, with amendments to provide for residential activity.
- Such further or other relief, or other consequential amendments, as are considered appropriate and necessary to address the concerns set out in this submission.

4.0 Map showing the Subject Site

The subject site and it's proposed zoning are shown in **Figure 1** below.

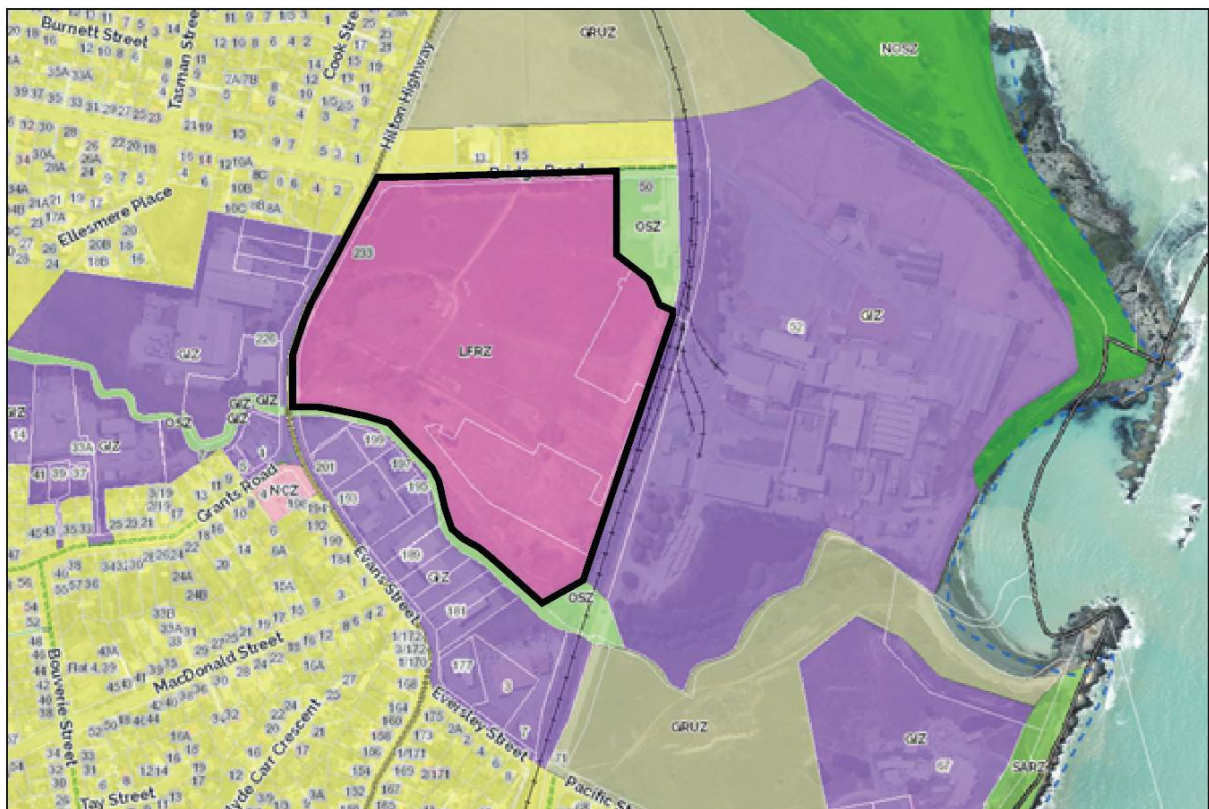


Figure 1: Subject site (shown in black boarder)