

BEFORE THE HEARING PANEL IN TIMARU

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions in relation to the Proposed
Timaru District Plan

**STATEMENT OF PRIMARY EVIDENCE OF TONY COOPER ON BEHALF OF
PRIMEPORT TIMARU LIMITED
AND
TIMARU DISTRICT HOLDINGS LIMITED**

**HEARING STREAM F
Hazards, Risks, Natural Environment and Other district-wide matters**

Dated: 9 April 2025

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EXECUTIVE SUMMARY

1. My full name is Tony Cooper. I am the Project Manager/Engineer at PrimePort Timaru Limited (**PrimePort**).
2. My evidence relates to the submissions and further submissions of PrimePort and Timaru District Holdings Limited (**TDHL**) on the Energy and Infrastructure, Subdivision, Transport and Stormwater chapters of the Proposed Timaru District Plan (**Proposed Plan**).
3. PrimePort Timaru is a 24/7 7 day a week operation within Precinct 7. It is essential that general PORTZ noise limits (particularly at night) are set so they facilitate 24/7 port operations.
4. I consider the recently included change to SIGN–S6 standard which limits free standing signs to one per frontage is inappropriate and unworkable in some areas of the Timaru port. Land titles within Timaru port are quite large and have long frontages with multiple entrances which may feed multiple wharves / terminals /operating areas and buildings. Linking a road frontage to one freestanding sign is generally not workable for Timaru port.
5. Since the mid 1860's, Hazard Management activities undertaken within the port have include the construction, repairs and maintenance of harbour breakwaters and protective earth bunds. These structures are essential to the safe operation of Timaru port. They require frequent repairs after storm events and where appropriate they will be progressively raised to manage sea level rise. It would be onerous for the Port to need to formally demonstrate existing use rights, or to have to obtain resource consents, to continue maintenance, repairs and minor upgrades to these existing hazard mitigation works.

INTRODUCTION

6. My full name is Tony Cooper. I am the Project Manager/ Civil Engineer Advisor at PrimePort and have held this role since July 2019. In this role, I am responsible for the detailed planning, consenting and implementation of major port construction projects. I also provide technical advice on civil engineering design, contract management, consenting matters, environmental management and health and safety management.

7. Prior to this role, from 2015 to 2019 I was the PrimePort Infrastructure Manager responsible for Timaru Port's land-based infrastructure assets and related engineering matters.
8. I have 45 years' experience as a civil engineer covering most aspects of civil engineering including design, construction and business management; 20 years of which as a Registered Engineer.
9. My Qualifications include an MBA (distinction) from Victoria University and a BE Civil from Canterbury University.
10. I have prepared this statement of evidence on behalf PrimePort in respect of matters arising from PrimePort's submissions and further submissions on the Proposed Plan.
11. I am authorised to provide this evidence on behalf of both PrimePort and TDHL, a 100% owned subsidiary of Timaru District Council with a 50% shareholding interest in PrimePort and a major landowner within the PORTZ.

Scope of evidence

12. My evidence relates to the submissions and further submissions of PrimePort and TDHL on the Hazards, Risks, Natural Environment and Other district-wide matters chapters of the Proposed Plan.
13. My evidence will outline:
 - (a) The importance of ensuring the PORTZ noise provisions are complimentary to and support and enable the Precinct 7 operations to proceed unrestricted on a 24/7 basis.
 - (b) The unworkability of the proposed SIGN-S6 standard which limits the number of freestanding signs along a road frontage to one.
 - (c) The hazard mitigation activities undertaken within the Precinct 7 and the PORTZ, and why these activities should be permitted activities and not require consent or existing use right justification.
 - (d) The use of shipping containers and relocatable buildings in the PORTZ.

NOISE

14. PrimePort Timaru is a 24/7 7 day a week operation. Vessels may arrive at any time day or night and loading/unloading will generally continue 24 hrs a day until such time as the vessel is fully loaded/unloaded.
15. The Proposed Plan recognises the noise effects emanating from port activities within the immediate port operational area (Precinct 7) and noise contours are identified within the Proposed Plan to recognise the noise generated from Precinct 7 activities, which PrimePort supports.
16. In conjunction with Precinct 7 operations, the wider Port Zone (**PORTZ**) provides 24/7 storage, handling, warehousing and distribution facilities that operate hand in hand with port operations – often occurring in parallel with vessel loading/unloading. These operations include:
 - (a) Fuel and other liquid piped through the PORTZ to storage and distribution facilities (relatively low noise impacts).
 - (b) Bulk products such as fertiliser which is unloaded directly onto truck and trailer units then over the Fraser Street weighbridge to various temporary bulk storage facilities. At present these storage facilities are located outside of the PORTZ, however, in the future the storage of some bulk materials may well return to the PORTZ
 - (c) Off-site empty container handling/storage in PORTZ (potentially moderate/high noise impacts)
 - (d) Off-site full container handling/storage in PORTZ (potentially moderate/high noise impacts)
17. It is essential that general PORTZ noise limits (particularly at night) are set so they facilitate 24/7 port operations within Precinct 7.

SIGNAGE – SIGN S6

18. I consider proposed rule SIGN-S6, which limits freestanding signs to one sign per road frontage, is inappropriate and unworkable in some areas of the Timaru port.
19. PrimePort uses freestanding road front signage for operational reasons to clearly direct traffic to specific wharves, terminals, operating areas and key buildings. These operational signs are not exempted from the restriction in

proposed rule SIGN-S6 because they are neither Official Signs nor Temporary Signs as defined in the Proposed Plan.

20. Most land titles within the port are quite large and have long frontages with multiple entrances which may feed multiple wharves / terminals /operating areas and buildings. Linking a road frontage to one freestanding sign is generally not workable in Timaru port.
21. As an example of the unworkability of SIGN-S6 in the PORTZ environment, Figure 1 shows the port land titles along the Port Loop road. Lot 16 DP55062 has a 500m (approx.) frontage on Port Loop Road.



Fig 1 Aerial Plan of Timaru Port with land title overlay

22. Along the Port Loop frontage there are six port operational – directional signs all of which are free standing or may be in the future (examples are shown in Photos 1-3)



Photo 1 PrimePort car park sign



Photo 2 Holcim Cement Terminal advance warning sign.



Photo 3 Wharf 1 directional sign and wharf 2 and 3 directional ENTRY sign.

23. Roadside directional and operational signage is an essential requirement in any port environment. Typically, every gate and wharf entrance require at least two free standing signs as do entrances to administrative / operational buildings (one an advance warning sign the other a directional sign). If adequate signs are not in place, vehicles (including truck and trailer units) will miss their turnoffs, resulting in potentially dangerous vehicle turning manoeuvres.

NATURAL HAZARDS – PORT RELATED HAZARD MANAGEMENT ACTIVITIES

24. The primary natural hazard managed by the port relates to wave action in storm events.
25. Since the start of Timaru Port construction in the 1860's the port has progressively constructed breakwaters to provide protection of vessels and wharf structures within the inner harbour from damaging wave action.
26. Breakwaters provide safe moorings for vessels in a severe storm environment. They also protect port infrastructure (e.g. wharves) from damaging wave action and eliminate the risk of inundation due to wave energy.
27. Breakwaters are typically constructed using armour rock and are constructed to a height several meters higher than mean high water spring tide. Large waves often break over the top of these structures in severe storm events, however most of the wave energy is dissipated.
28. Natural Hazard management activities undertaken by PrimePort within the Port Zone and Precinct 7 include:
 - (a) Inner harbour wharf breakwater/rock wall repairs and maintenance (within the Port Zone). This activity is only required occasionally as all wharves are relatively protected in the inner harbour.
 - (b) Outer breakwater repairs and maintenance – these works are permitted under the Canterbury Regional Council Coastal Environment Plan and may be required several times a year after big storm events.
 - (c) The Eastern Breakwater acts like a groyne and helps slow down the littoral drift of sand and gravels along South Beach which otherwise would be washed into the inner harbour and navigation channel. Since its inception this breakwater has been extended an average of 1m per year.
 - (d) Minor repairs to existing earth bunds on PrimePort land along South Beach. These bunds are there to manage extreme high tides and wave action. In the past 10 years the only repairs I can recall were due to 4WD activity on the beach.

29. Maintenance works generally includes the replacement of armour rock that has moved after big storm events. This work is typically undertaken immediately following a damaging storm event.
30. In early 2015, a big storm event washed over 20,000m³ of sand and gravel over the spurs and breakwaters at the northern end of South Beach and caused significant breakwater damage. This site was cleaned up, gravel stockpiled, and the breakwaters repaired ready for the next big storm.
31. These and similar Hazard Management Activities have been on going at PrimePort for well over 125 years. It would be onerous for the Port to need to formally demonstrate existing use rights, or to have to obtain resource consents, to continue maintenance, repairs and minor upgrades to these existing hazard mitigation works.

NATURAL HAZARDS – PROVISION FOR FUTURE SEA LEVEL RISE

32. Understanding actual sea level (in real time) is an essential operational requirement for most ports. To this effect PrimePort monitors (in real time) actual sea level and wave action within the port as well as wave action at the wave-rider buoy (in the open ocean).
33. This information enables PrimePort to identify long term changes in sea level and wave action (size and direction).
34. As sea level rise becomes significant, breakwaters will be progressively raised as part of routine maintenance operations. Wharves will be raised (if required) as part of any future replacement or upgrade strategy. The timing of these works will be decided by PrimePort using a risk-based approach using our detailed understanding of sea level and wave dynamics at Timaru port.
35. As stated previously it would be onerous and unproductive for the Port to need to formally demonstrate existing use rights, or to have to obtain resource consents, to continue maintenance, repairs and minor upgrades (including the progressive raising of breakwater heights) to these existing hazard mitigation works.

RELO-R1 AND RELO-R2 PLACEMENT OF RELOCATED BUILDINGS AND SHIPPING CONTAINERS

36. Shipping containers are used within the PORTZ to provide secure storage for equipment and to provide maintenance facilities. In some instances modified containers are also used as amenity blocks.
37. Relocatable buildings are used in various locations around the port to provide business administration support and amenities for various operations specific to that location.

Date: 9 April 2025

Tony Cooper