

Request for Plan Change under the Resource Management Act 1991

Talley's Limited

**78 Fairfield Road West and 109
Works Road, Lot 2 DP 413606 and
RS 39780, Ashburton**

**February 2025 (updated August
2025)**

Ashburton District Council

Reference: 22-242
Revision: Final



ANNEXURE 1: RECORDS OF TITLE

ANNEXURE 2: LOCATION OF PLAN CHANGE

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APPLICATION PREPARED BY

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Request for Plan Change

Pursuant to Section 73(2) and part 2 of the First Schedule of the Resource Management Act 1991

TO: The Ashburton District Council

Talley's Limited requests the following change to the Ashburton District Council:

To rezone Lot 2 DP 413606 and RS 39780 Ashburton from **Business F** to **Business E**.

1. **The names** of the owner and occupier (other than the applicant) of any land to which this application relates are as follows:

n/a

2. **The location** to which this application relates is:

78 Fairfield Road West, 209-222 Office Road and 109 Works Road, Ashburton: The land is legally defined as Lot 2 DP 413606 and RS 39780 held in Records of Title 1141185 and 9A/903.

3. Attached, in accordance with Section 73(2) and Part 2 of the First Schedule of the Resource Management Act, is an explanation for the Plan Change request and an Assessment of Environmental Effects plus a Section 32 evaluation for the proposed plan change.

.....
(Signature of applicant or person authorised to sign on behalf)

DATED:

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INTRODUCTION

OVERVIEW

1. Talley's Limited ('the applicant') requests the Ashburton District Council ('the Council') to change the Ashburton District Plan by rezoning the land held in Lot 2 DP 413606 and RS 39780, Ashburton ('the site') from Business F to Business E and adopt the operative provisions of the Business E zone ('the proposal').
2. The evaluation under section 32 of the Resource Management Act 1991 (the RMA) and Assessment of Environmental Effects (AEE) has been prepared on behalf of the applicant in support of and forms part of the proposal.
3. The site is part of the *Outline Development Plan – Business F zone: Silver Fern Farms* that is included as Appendix 5-1E of the Ashburton District Plan.
4. Silver Fern Farms no longer own or operate from all this land as it has been purchased by Talley's Limited. The Business F zoning *“provides for all activities related to meat processing including the yarding and slaughtering of animals, the associated processing of meat (including by-product and co-product processing) rendering, fellmongery, tanning, casing and pelt processing; and the associated chilling, freezing, packaging and storage of meat and associated products.*

The Zone provides for the spreading of effluent on some defined areas where this activity has historically been carried out. The zone also provides for the processing of other food products. An exception has been made for Lot 1 DP 46816 as shown on Appendix 5-1A (Area 2) to enable Service Activities to establish on this site. Activities on several sites within this zone are governed by Outline Development Plans. Permitted activities are required to be located in accordance with the Plans to avoid the impact of adverse effects. The locations of the zone, usually surrounded by rural activities, allow these facilities to operate without adversely affecting residential or other business activities, and provide room for future growth. Adverse effects on surrounding properties generated from food and meat processing include loss of visual amenity, traffic, noise and odour”.

5. Silver Fern Farms have ceased to exist at this site for over five years. Talley's have taken over all that land however the area of the subject Plan Change is better utilised for other development options in line with the adjoining Ashburton Business Estate Zoning.

PURPOSE OF THE PLAN CHANGE

6. The purpose of the Plan Change is to rezone some 32.5ha north of Ashburton and adjoining the Ashburton Business Estate, from Business F to Business E to provide for an extension to the existing Business E zone on adjoining land.
7. This proposed plan change aligns with use of the land which partially includes some 3ha being utilised for the Fairfield Freight Hub service and industrial use being a resource consent (LUC220126) for large scale freight logistics connected to a rail siding, the approved solar farm (LUC23/0119), the Talley's existing buildings and infrastructure located within the proposed Outline Development Plan area.
8. The proposal is generally shown on the Outline Development Plan included as Annexure 3. The site is considered more beneficial for Business E zone activity use as opposed to its current Business F zone status.

9. The existing ODP Silver Fern Farms Limited is now void in the sense its purpose was as a meat processing and support facility. The site of the Plan Change is within Area 1 of the ODP. Whilst as part of this Plan Change zoning there will be some food and produce processing associated with Talley's own site operations, this proposal will utilise the existing Business E zone rules, reasons for rules, objectives and policies and assessment matters outlined in the District Plan except where addressed in this Plan Change document.
10. An Outline Development Plan, (ODP) has been prepared as part of this Plan Change alongside a Section 32 of the RMA Assessment which validates the suitability of the site for business zoning and activity.

OVERVIEW OF STATUTORY FRAMEWORK

11. The Resource Management Act (1991) is the principal legislation for the management of the natural and physical resources of New Zealand. The Act provides a framework within which a Plan Change proposal may be exercised, which is detailed as follows:

Section 5 – Purpose of the Act

12. *Section 5 outlines the Act's purpose as follows:*

- (1) *The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) *In this Act, "sustainable management" means managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while:*
 - (a) *Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
 - (b) *Safeguarding the life supporting capacity of air, water. Soil and ecosystems; and*
 - (c) *Avoiding, remedying or mitigating any adverse effects of activities on the environment."*

Section 6 – Matters of National Importance

13. Section 6 – Matters of National Importance sets out the matters of national importance that shall be recognised and provided for:
 - (a) *The preservation of the natural character of the coastal environment (including the coastal marine area) wetlands, and lakes and rivers and their margins, and the protection of them inappropriate subdivision, use and development:*
 - (b) *The protection of outstanding natural features and landscapes from inappropriate subdivision, use and development:*
 - (c) *The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:*

- (d) *The maintenance and enhancement of public access to and along the coastal marine area, lakes and rivers:*
- (e) *The relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga*
- (f) *The protection of historic heritage from inappropriate subdivision, use and development.*
- (g) *The protection of protected customary rights.*
- (h) *The management of significant risks from natural hazards.*

Section 7 – Other Matters

14. Section 7 sets out other matters to which regard shall be had:

- (a) *Kaitiakitanga*
- (aa) *The ethic of stewardship:*
- (b) *The efficient use and development of natural and physical resources:*
- (ba) *The efficiency of the end use of energy:*
- (c) *The maintenance and enhancement of amenity values:*
- (d) *Intrinsic values of ecosystems*
- (e) *repealed*
- (f) *Maintenance and enhancement of the quality of the environment:*
- (g) *Any finite characteristics of natural and physical resources:*
- (h) *The protection of the habitat of trout and salmon:*
- (i) *The effects of climate change:*
- (j) *The benefits to be derived from the use and development of renewable energy.*

The matters of relevance to this Plan Change are the efficient use of natural and physical resources, the maintenance and enhancement of amenity values and the maintenance and enhancement of the quality of the environment. The formulation of this Plan Change has had regard to these matters, and particular regard was had as part of this planning process and the development of the ODP.

Section 8 – Treaty of Waitangi

15. Section 8 requires that the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) be taken into account.

Section 31 - Functions of Territorial Authorities

16. Section 31 outlines the functions of territorial authorities in regard to giving effect to the Act as follows:
- (1) *Every territorial authority shall have the following functions for the purpose of giving effect to this Act in its District*
 - (a) *The establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the District:*
 - (aa) *The establishment, implementation, and review of objectives, policies and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the District:*
 - (b) *The control of any actual or potential effects of the use, development, or protection of and, including for the purpose of:*
 - (i) *the avoidance or mitigation of natural hazards; and*
 - (ii) *Repealed*
 - (iia) *the prevention or mitigation of any adverse effects of the development, subdivision or use of contaminated land:*
 - (iii) *the maintenance of indigenous biological diversity:*
 - (c) *repealed*
 - (d) *the control of the emission of noise and the mitigation of the effects of noise:*
 - (e) *The control of any actual or potential effects of activities in relation to the surface of water in rivers and lakes:*
 - (f) *Any other functions specified in this Act*

Statutory Requirements of Section 32 of the Act

17. Section 32 of the Resource Management Act requires evaluation of a private plan change by the person making the request. The evaluation, carried out under Section 32 of the, must examine:
- (a) the extent to which each objective is the most appropriate way to achieve the purpose of the Act; and
 - (b) whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.

The evaluation is required to consider:

- The benefits and costs of policies, rules, or other methods; and
- The risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods. Specifically, section 32(2) requires identification and assessment of benefits and costs of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions including opportunities for:

- Economic growth that are anticipated to be provided or reduced; and
- Employment that are anticipated to be provided or reduced

The Guidance Note on section 32 analysis on the Quality Planning website, makes the following statement:

*Appropriateness - means the suitability of any particular option in achieving the purpose of the RMA. To assist in determining whether the option (whether a policy, rule or other method) is appropriate the **effectiveness** and **efficiency** of the option should be considered:*

• **Effectiveness** - means how successful a particular option is in addressing the issues in terms of achieving the desired environmental outcome.

• **Efficiency** - means the measuring by comparison of the benefits to costs (environmental benefits minus environmental costs compared to social and economic costs minus their benefits).

In this case it is the appropriateness of rezoning for a more relevant Industrial/Business use that needs to be examined.

18. An analysis of this Proposed Plan Change pursuant to Section 32 is provided further in this application to be read in conjunction with this document.

Section 73 – Preparation and Change of District Plans

19. Section 73(2) sets out that any person may request a territorial authority to change a District Plan in the manner set out in Part 2 or 5 of Schedule 1 of the Act. Clause 22 of Part 2 of Schedule 1 states that a plan change request must:
 - Explain the purpose and reasons for the request.
 - Contain an Evaluation report prepared in accordance with Section 32 for the proposed plan change.
 - Assess the environmental effects, considering clauses 6 and 7 of the Fourth Schedule of the RMA, in such detail as corresponds with the scale and significance of actual or potential environmental effects anticipated from the implementation of the requested plan change.
20. These matters are addressed in the sections that follow.

EXPLANATION

21. The site the subject of this application is shown in Figure 1 below. A more detailed plan and the relevant Records of Title are attached in Annexure 1.

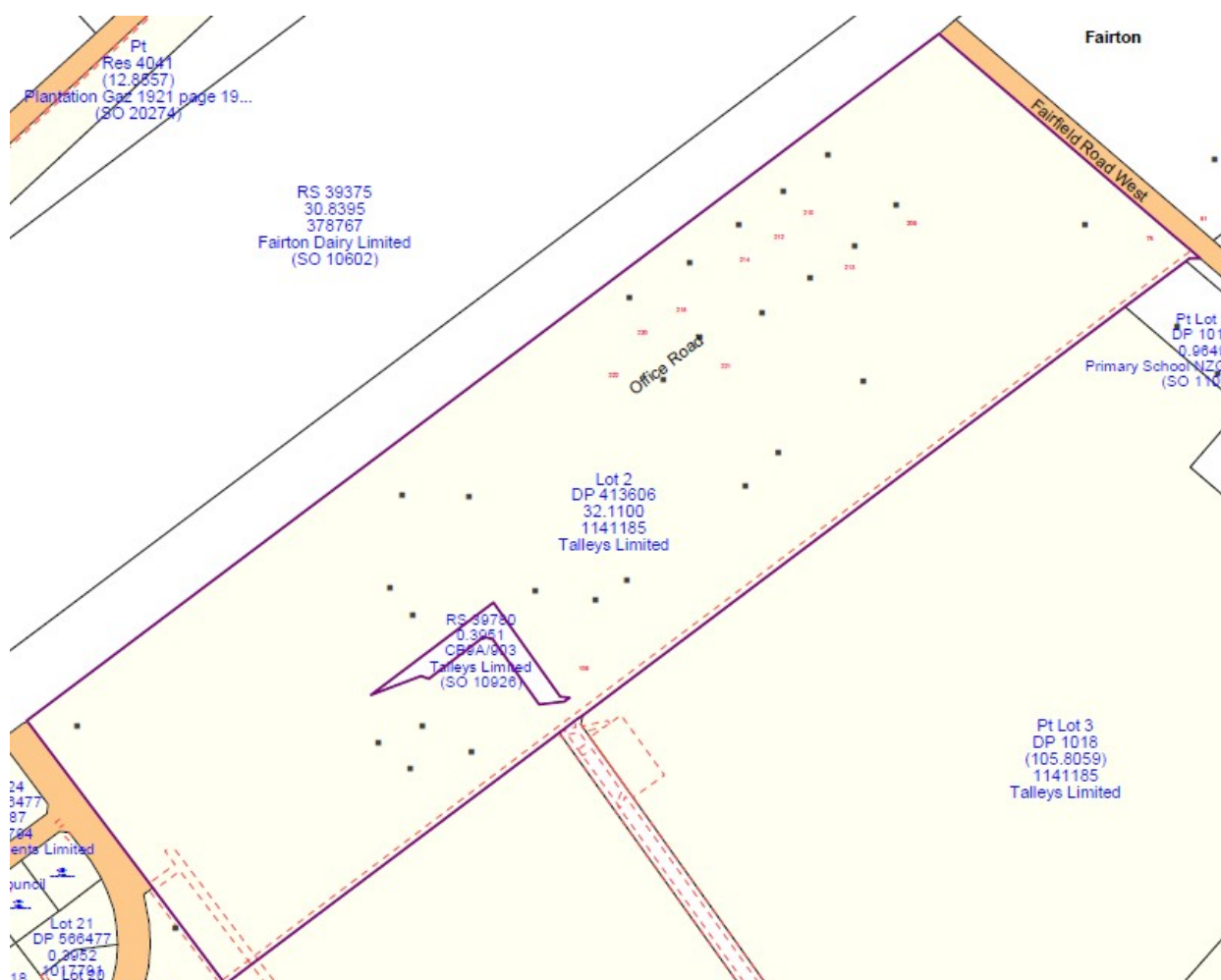


Figure 1: Site Location

22. The site includes the existing buildings associated with Talley's Limited operations including some storage buildings and workers housing. The Fairfield Freight Hub (FFH) located on the corner of the site closest to Works Road and is a consented development. This Plan Change is seeking a Business E zone and that also includes capturing the FFH. This is considered an appropriate zone for that activity so there is no significant issue raised with changing from Business F to E for that development.
23. A solar farm LUC23/0119, adjoins the Fairton Hall land. This solar farm was approved by the Ashburton District Council on part of the Talley's land that is within the proposed Outline Development Plan (ODP).
24. The proposal includes land owned by Talley's Limited which is a title of 138.17ha. It is only that part of the titles held within legal description Lot 2 DP 413606 and RS 39780 that is included for this Plan Change.
25. The site is bound by the Main South Island Railway Line, Fairfield Road East and Works Road/JB Cullen Drive with the south-eastern boundary of the site all land owned by the applicants.
26. The site is relatively flat in topography and shelterbelts run exist along parts of the boundaries of the site.

THE SURROUNDING AREA

27. The northwestern boundary consists of the railway line and designated land with pastoral farmland zoned Rural B existing beyond the railway line to State Highway 1.
28. The land to the west beyond JB Cullen Drive is Business E zoned land as part of the Ashburton Business Estate. There are buildings and roading established within that part of the business estate which is beginning to be developed.
29. Adjoining land to the southeast is the existing Business F zone which is land currently utilised for crop production as part of the Talley's business.
30. The land at the north-eastern end of the site borders with Fairfield Road with Rural B zoned land beyond and the Fairton township which is also zoned Rural B. Within the corner of the application site fronting to both Fairfield Road and Office Road (Private Road) is the Fairton Hall and tennis court. This facility is on Talley's land and formerly the Silver Fern Farms land. The hall is still functional and used from time to time and the intent is to retain this as part of the Plan Change proposal.
31. On the opposite side of the hall over Works Road is the Fairton Primary School. The solar farm LUC23/0119, adjoins the Fairton Hall land. This solar farm that was approved by the Ashburton District Council on part of the Talley's land within the proposed Outline Development Plan (ODP) is located closest to the Fairton Hall and school. As the school would be a sensitive activity, no specific setback or amenity rule is required for this Plan Change due to the solar farm being the closest activity to it and specific conditions were imposed on consent LUC 23/0119, that would address any non-compliance.
32. JB Cullen Drive (Works Road stops at the Railway Crossing) and Fairfield Road will provide the main access and egress points to this development as it occurs now. Office Road is a private road that provides internal connection for Talley's through the site and a further private road connection to Company Road further east.
33. JB Cullen Drive and Fairfield Road East are both collector roads in the District Planning hierarchy.
34. There is a designation being both the Railway corridor adjoining the site and the Fairton Primary School but there are no designations, heritage buildings, structures or significant trees affecting the application site.

NATURE OF THIS PLAN CHANGE

Changes to the District Plan

35. The Plan Change seeks to zone the site from Business F to Business E.
36. It is not proposed to delete any existing text from the District Plan; however, it is proposed that the following additions or amendments, shown in bold and strikethrough or in italics, be made to Chapter 5 (Business) and Chapter 7 (Subdivision) of the District Plan.

Section 5: Business Zones

Amend 5.1.1 Ashburton – add wording in *italics*

The Ashburton Business Estate (Business E Zone) is bounded by Northpark Road, Company Road, the Main South Railway Line and the Silver Fern Farms Meat Processing Plant, and provides 126 ha of business zoned land. The Estate provides for a broad range of service,

commercial and industrial activities but limits the scale of retail activities. *A further area of Business E zoned land (Talleys Fairton) is located to the east of the Ashburton Business Estate.* This business estate is expected to provide sufficient industrial land to cater for Ashburton's needs for at least 10 years.

Amend 5.3 Zone Description - add wording in *italics*

...

This zone includes land within the Ashburton Business Estate, whose development is required to conform to an Outline Development Plan to ensure mitigation of potential noise and visual effects at the boundary of the adjoining residential zone and traffic safety and efficiency on the adjoining road network. This Outline Development Plan requires a 75m buffer to be put in place with mounding and planting along the Residential D Zone interface. In addition, activities are intended to be graduated across the site with office, lighter service and industrial activities located on that half of the site closest to the Residential D Zone and the heavier, manufacturing activities closer to the eastern boundary, adjoining the meat processing facility.

In addition to the Estate, a further area of Business E zoned land (Talleys Fairton) is located between the Ashburton Business Estate, Main South Railway Line, Fairfield Road and Business F zoned land. Within this area, development is required to conform to an Outline Development Plan included as Appendix 5.6 which requires a roading connection through the site between JB Cullen Drive and Fairfield Road. Additional setbacks are required to reduce built form adjoining Fairfield Road and Fairton School.

In Rakaia, additional land has been zoned for industrial activities. Any development will be required to conform to an Outline Development Plan to protect the amenity of the adjacent State Highway at the entrance to Rakaia, and also where there is an adjoining residential zone. Remaining Business E zoned land is located on the outskirts of Tinwald and includes the existing saleyard facilities.

5.4 Objectives and Policies

Amend Policy 5.2D to include in *italics*

Within the Business E zone at the Talleys Fairton site

- *That any development conforms with the Outline Development Plan in Appendix 5.6*

Amend Policy 5.3B to include

Enabling future commercial and industrial opportunities, principally in the Ashburton Business Estate, *Talleys Fairton* and Riverside locations, by requiring:

- any development in the Ashburton Business Estate is carried out in accordance with the provisions of the Outline Development Plan for that area so as to ensure the protection of the amenities and quality of the environment in the adjoining Residential D Zone to the south and west;
- a landscaped buffer be provided between residential and business activities in the Ashburton Business Estate;

- the development of a structure plan(s) incorporating landscape treatment, noise mitigation and control of the location of activities prior to subdivision and the establishment of activities in the Ashburton Business Estate;
- vehicle and pedestrian conflicts are avoided, remedied or mitigated at the rail crossings on Northpark and Works Roads;
- increased setbacks for buildings alongside Fairfield Road and Fairton School in the Talleys Fairton area, so as to maintain amenity and reduce the visual dominance of built form in these locations;
- provision of future development in the Riverside area dependant on the establishment of a suitable alternative road access;
- protection of residential properties adjoining the Riverside area through buffer areas and landscaping;
- possible provision of links to the river corridor and recreational facilities from the Riverside extension.

Explanation and Reasons

Add additional wording to include in italics

These policies seek to avoid, remedy or mitigate adverse effects on the surrounding environment created by business activities. Of particular concern is the effect that business activities may have on lowering the quality of living environments adjacent to business areas. They also consider public safety and the need to minimise pedestrian and vehicle conflicts. This is of particular importance where industrial activities increase the frequency of truck or heavy traffic movements through residential areas.

The Ashburton Business Estate has been established with a comprehensive set of provisions which are intended to enhance amenity and protect the surrounding areas of residential and rural land. Increased setbacks apply to the Talleys Fairton site to minimise the effects of built form on adjoining areas which have a higher sensitivity to potential dominance from buildings.

In addition, provision has been made...

5.7 Reasons for Rules

5.7.2 Setbacks from Streets – add additional wording (in italics)

...

e.

In the Business D and E Zones a 5m setback is required to keep noxious or often unsightly business activities away from the direct view of the road and to provide sufficient area for the establishment of landscaping. However, within the Ashburton Business Estate a variable setback is prescribed from Company Road, depending on the height of the building. Buildings up to 5m in height need only be setback 5m, which is sufficient width to establish landscape planting. A 10m setback is required for buildings up to 10m high which have greater potential to impact on the view and amenity of Company Road. A setback is not required along Northpark Road as a 75m buffer, vested in Council as reserve is proposed to achieve

separation and amenity in this location. A lesser distance has been prescribed for setback from local roads where the volume of traffic is not as significant. These setbacks also provide the opportunity for landscape treatment within the zone.

A 10m setback is required in the Business E Zone at Talleys Fairton to minimise the potential dominance of tall buildings on this road frontage and the adverse effects on amenity that could arise from this dominance.

The Business F Zone has extensive setbacks of 10-30m due to the potential noxiousness of onsite activities, the size of the buildings and the rural location which has an open space character.

5.7.3 Setback from Neighbours – add additional wording (*in italics*)

...

In the Business E Zone, setback from neighbours is required in the Ashburton Business Estate between sites which directly adjoin the buffer. For properties within Area 1 of the Estate a setback between buildings on neighbouring sites is appropriate to ensure that a continuous wall is not created which adversely affects the amenity and outlook from the buffer and Residential D Zone.

In the Business E Zone at Talleys Fairton, a setback from Fairton School is required to minimise the potential dominance of tall buildings on the school grounds and the adverse effects on amenity that could arise from this dominance.

In all other business areas no controls have been placed on setback from neighbours as it is considered that this achieves little with regard to amenity in such areas and instead provides maximum opportunity for individual sites to be used efficiently and economically. Where applicable, building coverage limits are also likely to avoid comprehensive site coverage.

5.7.18 Outline Development Plans – add additional wording *in italics* and remove wording as detailed below

The Business F Zone (Appendices 5-1A, 5-1B, 5-1C and 5-1D) includes ...

Ashburton Business Estate (Business E Zone. Appendix 5-2A) is located adjacent to Residential D Zone along its western boundaries...

Talleys Fairton is located to the east of the Ashburton Business Estate and to the north of the Silver Fern Farms meat processing facility at Fairton. The Outline Development Plan for this area includes roading connections through the site, from JB Cullen Drive to Fairfield Road, along with indicative stormwater detention areas for the servicing of future development.

The Riverside industrial area comprises of Business D Zoned land...

Another Outline Development Plan exists for the Business E Zone at Rakaia, specifying ...

The Outline Development Plan for the Silver Fern Farms meat processing facility at Fairton sets out the activities that can be undertaken within Area 1 and Area 2. ~~Area 1 provides for meat Processing, Food and Produce Processing as permitted activities.~~ Area 2 provides for the treatment/disposal of wastewater, forestry and farming activities only. The company has consent to dispose of its effluent within Area 2 and provision is made for this through the Outline Development Plan.

5.8 Rules – Business Zones

Add wording to rule 5.8.9 (c) as follows (underlining added)

c) *All sites in the Business D and E zones, subject to Outline Development Plans in Appendices 5-3 ~~and~~ 5-4 ~~and~~ 5.6 shall provide landscaping in the form of tree planting in the areas indicated on the Outline Development Plans as follows:*

- *trees shall not be planted a distance of more than 25m apart or closer than 5m.*
- *at the time of planting all trees shall have a minimum height of 1.5m or be at least 3 years of age.*

Amend Rule **5.9.2 Setback from Streets** (in italics)

a) Minimum setback of any building from road boundaries shall be as set out in Table 0-2 below:

Table 0-2: Business Zone Road Boundary Setbacks

Zone	Setback
Business A	No buildings shall be set back from road boundaries
Business B	There shall be no minimum setback except from the following roads: SH77 – 4.5 metres
Business C	2m except for the following roads: SH1 in Tinwald – 14 metres SH77 – 4.5 metres
Business D and E	5m except for <u>the following roads</u> : Company Road: buildings up to and including 5m in height – 5m buildings over 5m in height – 10m <u>Fairfield Road – 10m</u>
Business F	10m except that:

the minimum setback of buildings used for the housing or slaughtering of animals or processing of meat or processing of produce shall be as follows:

20m in the Business F Zone at Bridge Street

30m in all other Business F Zones

Amend **Rule 5.9.3** ***Setback from Neighbours*** (in italics)

a) Minimum setback of buildings from internal boundaries shall be as set out in Table 0-3 below:

Table 0-3: Business Zone Internal Boundary Setbacks

Zone	Setback
Business E – Ashburton Business Estate only	Where the site directly adjoins the 75m buffer, as defined in the Outline Development Plan, any building shall be setback 10m from one internal side boundary that is generally perpendicular to the boundary with the buffer. This setback from an internal side boundary shall not apply to those parts of any building which are sited 20m or more from the boundary with the buffer.
<u>Business E – Talleys Fairton only</u>	<u>Where adjoining the boundary with Fairton School (Designation 62), any building shall be setback 10m from that boundary.</u>
Business F – for buildings which are used for the housing or slaughtering of animals or for the processing of meat or produce	30m except that minimum setback distance for all buildings from the western internal boundary of Part Reserve 1774 with the adjoining railway land shall be 10m.
Business F – all other buildings	10m

Add a new rule as 5.10.3 (h)

Rule: Talleys Outline Development Plan

No development shall take place in the Business E Zone at Talleys Fairton, except in accordance with the Outline Development Plan attached in Appendix 5-6.

Subdivision Chapter 7

9.8.13(a):

Any subdivision and/or development within the Talleys Fairton Outline Development Plan shall be undertaken in general accordance with that Outline Development Plan included within Appendix 5.6 of the Business Zone Chapter of the District Plan.

Amend Appendix 5-1E Outline Development Plan – Business F Zone: Silver Fern Farms to remove Area 1 Add **Appendix 5.6 Talleys Fairton Outline Development Plan.**

Amend **Planning Maps U26, U31 and U32** to change the **Business F** zone to **Business E.**

37. The new rules requested above for the Business zone is proposed as a site and zone standards and the subdivision rule as a general standard.
38. By including the Outline Development Plan (ODP) and the new rules linking to that ODP, this will provide for the development's intent. Should additional rules or standards be required following Councils assessment, this can be considered as part of the Plan Change proposal.

PURPOSE OF THE PLAN CHANGE

39. The purpose of this Plan Change is to enable business activity to be undertaken on the site within the provisions of the existing Business E zone provisions and standards except where new rules or standards are proposed.
40. The Outline Development Plan and the infrastructure report quantify the suitability of this site for its new zoning and provides a workable and co-ordinated framework for future development.
41. The Talleys Outline Development Plan is included as Annexure 3. The proposed servicing for this site is also discussed further in this document.

REASON FOR THIS PLAN CHANGE

42. Following investigation of the site and its surrounds it is considered this land is suitable for future business development within the limits of the site owned by Talleys and near to the existing infrastructure and roading. This Plan Change seeks to initiate the rezoning which provides for a business growth option for land that no longer fits the current Business F zoning.
43. This Plan Change has come about because it provides additional industrial land and options for Ashburton. The applicants view that offering up to 33ha of land provides an option for future development of possibly larger scale warehousing/storage or a mix of industrial activities easily accessible from the road network and acting as industrial land in addition to the Ashburton Business Estate land adjoining.

CONTEXT OF REZONING REQUEST TO DISTRICT PLAN

44. The applicants have considered that this land is ideally located between main traffic routes and adjoining an established Ashburton Business Estate to the south.
45. Chapter 5 of the Canterbury Regional Policy Statement makes provision for any adverse effects of development within the wider region. In particular issue 5.1.1 states.

Development, including the associated use and provision of infrastructure and services, is important to enabling people and communities to provide for their social, economic and cultural well-being, but where not appropriately managed can result in significant adverse effects on the environment.

46. Connected to this in 5.1.2 is consideration of any inappropriate design, location and function of development within the wider region. In particular.

Growth and development, if inappropriately designed and located, can reduce the community's well-being or health and safety.

Development can either enable or adversely affect the ability of people and communities to provide for their social, economic and cultural well-being, and health and safety. Once development is established it is likely to exist for a number of generations. Changing the form and structure of established urban, rural-residential and rural areas can be difficult and expensive.

Therefore, it is important to achieve a robust form of development that is responsive in the long term to changing needs of people and communities. Unless the design, location and function of development is carefully managed, it will not necessarily be able to:

- 1. respond to changes in the demographic structure of the population;*
- 2. enable socially cohesive and resilient communities*
- 3. improve the efficiency of energy use;*
- 4. reduce vehicle trip frequency, trip generation and distance, and improve modal choice so as to reduce adverse effects on the environment of high energy consumption and associated discharges to air resulting from dependence on private motor vehicles;*
- 5. make efficient use of physical resources within communities;*
- 6. efficiently and effectively provide public infrastructure such as roads, sewerage, stormwater and potable water;*
- 7. respond to the effects of climate change;*
- 8. recognise the relative value of land for urban, rural-residential and rural uses;*
- 9. recognise and avoid reverse sensitivity effects; and*
- 10. maintain or protect people's health, well-being and amenity.*

47. This proposed plan change will be appropriately designed and is an efficient use of the land for business or industrial use to provide for people's health, well-being and amenity.

48. The proposal can meet or at least be considered to meet most if not all of the matters raised in points 1 – 10 above. Infrastructure is available to the site or at least can be connected as detailed in the infrastructure report included as Annexure 4 and the development to the site is an efficient use of the land and infrastructure available to service the land.
49. The site is able to be utilised for the proposed development with no reduction in community well-being. The land is currently zoned Business F which is a specific zone for the former meat works Silver Fern Farms. Some of the land is already utilised for development including the Fairfield Freight Hub and note that the former Meat works plant is undergoing some redevelopment for Talley's own usage or ancillary uses on the site.
50. The position adjoining an existing business estate (Business E zoning) with ability to be connected to infrastructure and in particular, roading, makes this an opportunity for a more intensive use of available land.
51. The Ashburton District over the last decade or more has seen some high levels of growth. In terms of Industrial land, this is particularly, the case where the Business E zone is concerned with a lot of construction and business underway over that land with more development due to be undertaken within the next two years.
52. This Plan Change provides a new zoning for the site with the intention to provide ability for varying scale and density of industry in accordance with the Business E zoning criteria.
53. The 32.5 ha site is proposed to be part of the plan change area. There is a circa 13.1 ha area is the existing Fairfield Freight Hub and the proposed Solar Farm which both have approved resource consents as shown in Figure 2.
54. There is ability to service this land from infrastructure available through roading and essential services.
55. This proposed plan change is proposed to be fully serviced with reticulated water, sewer, electricity and telecommunications.
56. In terms of some efficiencies and consideration for the proposed zoning.
 - The essential infrastructure will be provided over the entire site affording a level of development commensurate with the cost of establishing and installing these services.
 - Landowner or lease holder aspirations are subjective however there is ability for a mix of industrial uses albeit the available land to undertake this is limited to less than 20ha on the basis of the existing established land uses on the land and land unavailable due to roading and any stormwater management purposes.
 - The proposal does provide good vehicle linkages/connections to other land.
 - The traffic access has been well thought through with provision for connection into the existing road network. The integrated transport assessment report completed by Abley's is included as Annexure 6.
 - The engineering services has been considered and some assessment details storm water management for both surface flooding, hardstand and roof storm water in rainfall events. This is captured in the Infrastructure Report included as Annexure 4.
 - The financial contributions will be payable in terms of development contributions at the time of building for sewer and water.

The Plan Change provides the framework for this development to occur within the standards and intent of the Councils District Plan. The proposed zoning will allow flexibility in a purchaser's or leaseholders choice of section and location within the site.

ASSESSMENT OF EFFECTS

Benefits of the Plan Change

57. Rezoning of this block of land will enable a mix of potential industrial allotments to be created. There is no minimum net area for subdivision in the Business Zones. The development can be considered to anchor up this northern edge of Ashburton as an area for Industrial development and the site both upon and is adjoining existing Business Zoned development alongside the existing business activities that are being undertaken over part of the site.
58. This area is limited to how much of the land can be developed for Business E zoning as inground infrastructural services and the ability to service the land is close to this point, the road speed zone for internal roading can be 50km/hr at this location.
59. The ODP ensures that there is provision for through access from JB Cullen Drive through to Fairfield Road partially following the existing sealed internal roading (Road 1) with new roading connection in the curvature shown on the ODP to pass around the side of the proposed solar farm. There is provision for a second new road (Road 2 on the ODP) to connect with the existing roading or access from Fairfield Road.
60. Regarding the positive impact on the local economy, development of the rezoned land will add notably to the local economy through industrial development therefore generation direct and indirect employment opportunity.

Servicing

61. Details of the servicing requirements which involve connection to Council services and electricity and fibre communications. Initial consultation has been undertaken with Ashburton District Council asset engineering and EA Networks engineers regarding ability to connect.
62. These are summarised as follows based on the findings of the Infrastructure Report from E2 Environmental.
 - Water can be supplied by the existing ADC water supply network that currently extends to the edge of the site from the Ashburton Business Park. The engineers undertook consultation with ADC to confirm that the area can be serviced for high pressure water without significant impact on the remaining network.
 - Wastewater can be serviced by the existing ADC wastewater infrastructure network for ultimate treatment at the Ashburton Wastewater Treatment Plant (WWTP). Consultation with ADC engineering said they do not believe that the extra demand will cause problems for the Company Road Wastewater Pressure System (WWPS).
 - *All stormwater can be serviced via individual consents per lot, or by a global stormwater consent, similar to ADC's current global stormwater consent (CRC186263), which is the recommended option.* As shown on the ODP, land owned by Talley's directly to the south of the site has been allocated as a designated Stormwater Management Area (SMA), with preliminary calculations estimating the required area is approximately one hectare.
 - From a geotechnical aspect and based on the outcomes of the onsite soakage testing, the soil bearing capacity could meet the definition of "good ground" in accordance with

NZS3604. This outcome remains high level *at this stage and is required to be confirmed by more detailed geotechnical investigations*. These may be required either at time of subdivision or prior to building consent issue, following plan change approval for the site.

- Due to the proximity of power and telecom infrastructure networks, servicing for this development is not anticipated to be an issue for this development.

63. This proposed plan change is proposed to be fully serviced with reticulated water and sewer. The creation of larger lots may well create demands on infrastructure in terms of additional water for processing activities or the like.
64. The essential infrastructure will be provided over the entire site affording a level of development commensurate with the cost of establishing and installing these services.
65. The proposal does provide good vehicle connections and linkages as detailed in the Abley Transport report. The traffic access has been well thought through with provision for connection into the existing road network.
66. The engineering services detail is very comprehensive in terms of storm water management for both flooding, hardstand and roof storm water.
67. Financial contributions will be payable in terms of development contributions at the time of building consent, for sewer and water services.

Soil Contamination

68. Williamson Water & Land Advisory Limited prepared a Preliminary Site Investigation (PSI) for the site. A copy of the report is included As Annexure 7.
69. No consents are required from Environment Canterbury under the NESCS or Canterbury Land and Water Regional Plan (CLWRP) for this Plan Change.
70. There may be consents required in the future under the NESCS for future land disturbance or earthworks which may require additional soil testing or a Detailed Site Investigation.
71. Of note within the WWLA report is that *earthworks implications are provided for reference against future site disturbance or development works. Where it is not already covered, for will be exposed by future works, either remediation or management (covering) of fill containing elevated concentrations of asbestos will be required. To date this fill has only been identified in the central portion of the site, associated with the former freezing works plant and associated facilities. Aside from controls required to remediate or cover fill containing elevated concentrations of asbestos, construction related earthworks are expected to be managed under standard earthworks controls and procedures.*
72. The PSI indicated that the land had generally been used as farmland associated with the Tinwald sale yards for all its known history. The PSI report considered it *“highly unlikely that most of these activities could have caused soil contamination on the subject site in sufficient quantities to pose a risk to human health”*.

Natural hazards and geotechnical constraints

73. A geotechnical investigation has not been prepared as part of this Plan Change application. This can be included as part of any future subdivision application either via a condition or advice note.

74. A flood hazard assessment has not been undertaken for this proposal. The site is not located within a flood hazard area identified in the Ashburton District Council flood maps.
75. There are no other known potential natural hazards that could affect the Plan Change site. The site is not likely to be subject to material damage from erosion, falling debris, subsidence, slippage of inundation from any source.

Water Quality

76. Effluent treatment and disposal or stormwater generated by increases in impervious surface coverage have the potential to adversely impact water quality, and in particular, groundwater quality. Details on infrastructure were detailed as part of the servicing details earlier in this application.
77. All stormwater generated on site will be collected and discharged to ground in accordance with Council requirements or residential stormwater to ensure that groundwater quality is not adversely impacted.
78. Any consents will be obtained from Environment Canterbury for this discharge if required.

Potential Reverse Sensitivity

79. The site adjoins the existing Business E zone being the Ashburton Business Estate, some rural zoned land on the opposite side of the main railway line and the Fairton Hall and School are to the northeast with the Fairton Township Residential zone further northeast beyond Fairfield Road. State Highway 1 is to the north.
80. There is limited potential for people or companies within this site to be impacted by noise, odour, and traffic impacts of other activities close to the site. There is a level of existing traffic and noise within the Talley's site now which is the day-to-day activities undertaken by Talley's so essentially any activities outside of this site will be of no moment for the applicants.
81. It is expected that new tenants or occupiers will have chosen to live or operate on adjoining land with some expectation of potential effects occurring from time to time. It can be noted too that this site was formerly Silver Fern Farms freezing works, and this formed part of this environment for decades and was a critical part of Ashburton employment and the local economy.
82. There is potential for amenity impacts and consequential complaints by owners/occupiers. Based on the potential uses of the Proposed Plan Change land (Business E zone provisions), it is unlikely that there would be complaints about existing activities in the vicinity of the Plan Change land.
83. Existing vegetation or new boundary treatments or details within subdivision or Outline Plan design can also adopt techniques to soften the interface (e.g., the proposed solar farm which forms part of this ODP has landscape requirements to improve amenity).

Well-functioning Urban Environment

84. The proposed Outline Development Plan captures the essential components of an underlying conceptual plan while retaining a measure of flexibility to respond to additional opportunities and constraints i.e., stormwater management. Note that the ODP shows two areas for stormwater management outside of the actual ODP area. These two areas are still upon land owned by Talley's so there is no issue as to ownership or management of those areas.
85. In summary the ODP either facilitates or enables:

- Vehicle access via Fairfield or JB Cullen Drive and connection to internal roads known as Office Road and the internal road to Company Road to the south.
 - Stormwater detention and management is in two locations southeast of the development in terms of treating on site stormwater generation.
 - Active transport modes with footpath and road connection included.
 - Ability to serve the development with essential services with any upgrades or works required to complete the development.
86. The zoning will enable a range of section sizes and industry to establish providing future tenants or purchasers with choice. Note that within the ODP the Fairfield Freight Hub, some Talley's building infrastructure and proposed solar farm area are included which takes up circa 13ha of the land area
87. The roading pattern and position within the site will enable ability and options for various sized allotments.
88. In addition, the use of the land is for industrial and service-related purposes for business and therefore the need for any public open space is less.
89. Walking and cycling is promoted through the provision of streetscapes with different formations depending on their role within the development and the wider area. The connected roading or access patterns make this an option.
90. These elements above will contribute to a well-functioning urban environment.

STATUTORY DOCUMENTS

91. The policy and planning framework relevant to the industrial development is extensive including policy statements, plans and legislation at a national, regional and district level. The following provides an assessment of the proposed plan change for rezoning in relation to this framework.

National Policy Framework

Part II of the Resource Management Act 1991

92. The most relevant sections of Part II are sections 5 and 7 as there are no matters of national importance that are relevant to this proposal. As there is already Business E zoned land adjoining the site and considering the ability for this site can connect to essential services and is limited in scale, it is considered that the proposal is an efficient and sustainable use of the land resource. This increase in industrial zoned land within this part of Fairton provides choice in future business development options.

National Policy Statement on Urban Development 2020

93. The National Policy Statement on Urban Development (NPS-UD) is intended to ensure regional policy statements and regional and district plans provide adequate opportunity for land development for housing and business to meet community needs. This is to be achieved by improving the responsiveness and competitiveness of land and development markets to support productive and well-functioning urban environments.
94. Ashburton District is a Tier 3 local authority under the NPS-UD. Tier 3 Authorities *are strongly encouraged to do the things that tier 1 or 2 local authorities are obliged to do under Parts 2 and 3*

of this National Policy Statement, adopting whatever modifications to the National Policy Statement are necessary or helpful to enable them to do so.

95. The NPS-UD has the primary objective of creating well-functioning urban environments now and into the future. Importantly regional policy statements and district plans are to enable people to live in urban environments near centres or other areas with employment opportunities or are well serviced by public transport and/or where there is a high demand for housing in the area.
96. Objectives of the NPS-UD also strive for (amongst other matters) urban environments that provide for social, economic and cultural well-being and planning decisions that improve housing affordability by supporting competitive land and development markets.
97. To achieve this, it is expected that there is provision of sufficient development capacity over the next 30 years to meet expected demand. The NPS-UD requires future development strategies to achieve this capacity.
98. Rezoning of land at Ashburton is assessed below in relation to the relevant policies of the NPS-UD: This assessment supports the rezoning as appropriate and an efficient means of implementing the NPS.

Policy 1

99. The rezoning is in a location which will enable easy access to employment and transport routes in proximity to the Ashburton township. The outline development plan provides the basic form of development. This will be further refined through the subdivision process where there is an option ensuring that a variety of sites are proposed via subdivision that are suitable for different business sectors in terms of location and site size.
100. Resilience to likely current and future effects of climate change the primary way this can be achieved within new urban development through encouraging reduced greenhouse gas emissions. Given that the rezoning is providing for growth reduced greenhouse gas emissions can be achieved through a compact urban form and proximity to community and business services. The proposed development area lies just on the edge of Ashburton's infrastructure boundary as such.

Policy 2 – Development Capacity

101. The proposed rezoning has been calculated to provide for business land for the site. It can be said that this site at this location is considered suitable as it is on the fringe the Ashburton Town boundary now and could be connected to reticulated services and will therefore contribute to future development options in addition to the existing Ashburton Business E zone adjoining.

Policy 5 – Urban Form

102. *Regional policy statements and district plans applying to tier 2, and 3 urban environments enable heights and density of urban form commensurate with the greater of:*
 - (a) *the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or*
 - (b) *relative demand for housing and business use in that location.*
103. The proposed development would enable active transport linkage through the site via the existing road connections and additional land suitable for industry at this northern end of Ashburton in the Fairton area is anticipated to gain interest. This is not a large scale ODP area in

relation to the Ashburton Business Estate area. Based on the limited scale of the land available for development (circa 19ha) this provide a level of land volume that provides an additional business zoned offering.

Policy 6 – Urban Environments

104. This Policy States.

When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

- (a) *the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement*
- (b) *that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:*
 - (i) *may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
 - (ii) *are not, of themselves, an adverse effect*
- (c) *the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)*
- (d) *any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity*
- (e) *the likely current and future effects of climate change.*

105. This proposal will make a change to the area in the sense the proposal is seeking rezoning of existing Business F zoned land (now of limited relevance due to it being a strategic zoned for Silver Fern Farms) to Business E zoned land suitable for industrial use.

106. Amenity Values will change in the sense that what included areas of open land will now be better utilised for business purposes on what is land currently zoned Business F but the rules within the zone do not allow the types of industrial and service activities that could better utilise this land.

107. This proposal is considered to contribute to a well-functioning urban environment.

Policy 8 – Responsiveness to plan changes.

108. This policy requires local authority decisions to be responsive to plan changes that add significantly to development capacity and contribute to well-functioning urban environments even if the development capacity is not anticipated by current RMA documents or is out-of-sequence for planned land release. In terms of this District, this proposal adds to development capacity but whether it is significant is a difficult matter to quantify. However, it does contribute to a well-functioning urban environment. Due to the NPS-UD very few councils have yet defined the criteria for assessing what constitutes “significance” in terms of development capacity.

National Policy Statement – Highly Productive Land

109. The land is zoned Business F. This legislation only applies to land zoned Rural. That said, the balance of the Business F zoned land outside of the ODP area owned by Talley's is used for production purposes with a lot of crops in the ground now.

Canterbury Regional Policy Statement (CRPS)

110. The Canterbury Regional Policy Statement ("RPS") provides an overview of the resource management issues of the region. It sets out how natural and physical resources are to be managed in an integrated way to promote sustainable management. District Plans have been prepared in accordance with the RPS, and the Resource Management Act directs the Council to have particular regard to this document.
111. A key issue to consider is whether changing the zoning of the site in the District Plan would make the District Plan inconsistent with the RPS. For the purposes of this assessment, it is accepted that the District Plan, in its present operative form, is consistent with the RPS.
112. The proposed plan change has been assessed as being consistent with the relevant zone purpose, objectives, policies and performance standards of the District Plan, and any actual or potential cumulative adverse effects have been assessed as likely to be no more than minor. Its current Business F zoning can be considered to assist with the consistency due to its already existing business-related uses and intent. Therefore, altering the zoning(s) of the site in the District Plan will not render the District Plan inconsistent with the RPS.
113. The CRPS sets out matters relevant to the growth of settlements within the region. Chapter 5 of the CRPS addresses concerns resulting from land use and infrastructure on a region-wide basis, and the objectives and policies of this chapter seek to ensure that development and growth does not have an adverse effect on the environment.
114. Assessment of the relevant objectives and assessment of Chapter 5 are set out below:

CHAPTER 5- LAND-USE AND INFRASTRUCTURE

5.2 OBJECTIVES

5.2.1 Location, design and function of development (Entire Region)

115. Development is located and designed so that it functions in a way that:
1. *achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth; and*
 2. *enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which:*
 - a. *maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values.*
 - b. *provides sufficient housing choice to meet the region's housing needs.*

- c. *encourages sustainable economic development by enabling business activities in appropriate locations.*
- d. *minimises energy use and/or improves energy efficiency.*
- e. *enables rural activities that support the rural environment including primary production.*
- f. *is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure.*
- g. *avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure.*
- h. *facilitates the establishment of papakāinga and marae; and*
- i. *avoids conflicts between incompatible activities.*

116. This objective achieves consolidated, well designed and sustainable growth in and around existing urban areas. The proposed rezoning will meet this outcome as it is between the township of Fairton and the Ashburton Business Estate but can be said to be on the northern fringe of the urban area for Ashburton.

117. The rezoning of this part of the land will address the third element as it will enable the community to provide for their social, economic and cultural wellbeing through provision of additional business zoned land at the northern end of Ashburton where presently there is limited vacant land for business development other than the established Ashburton Business Estate.

118. Clause 2 sets out location and design parameters. These are assessed as follows:

- There are no areas of particular or significant natural values. There is significant regional infrastructure in terms of State Highway 1 nearby and the Ashburton Business Estate could be factored as major infrastructure in terms of the scale of business activity upon it.
- The area has the primary purpose of provision of industrial land and provides a choice for people of the region, and in particular, the greater Ashburton District.
- The development does specifically provide for business use in accord with the Business E zone provisions. However economic and business activity is continually expanding within Ashburton District and in particular in and around Ashburton and enables future scope for development in an appropriate location.
- Potential conflict is expected to be limited due to the land use history of the area.

119. There are a number of policies that implement this objective. In particular.

Policy 5.3.1 Regional Growth

To provide, as the primary focus for meeting the wider region's growth needs, sustainable development patterns that:

1. ensure that any

a. urban growth; and

2. *encourage within urban areas, housing choice, recreation and community facilities, and business opportunities of a character and form that supports urban consolidation;*
 3. *promote energy efficiency in urban forms, transport patterns, site location and subdivision layout;*
 4. *maintain and enhance the sense of identity and character of the region's urban areas; and*
 5. *encourage high quality urban design, including the maintenance and enhancement of amenity values.*
120. This policy is closely aligned to the proposal with the creation of a business opportunity through land development on what is the fringe of north Ashburton.
121. The transport pattern for the site is to a large degree pre-determined through the roading connection provided via JB Cullen Drive and the existing roading from Fairfield Road. Informally, known as Office Road, the roading connections enable through access between two established road connections to State Highway 1 and the land further east which provides alternate roading links to the north and south.
122. The layout and design proposed for the site will include a level of amenity in the form of roading and berm areas and some landscape features as part of the site development and subdivision.

5.3.2 Development conditions (Wider Region)

To enable development including regionally significant infrastructure which:

1. *ensure that adverse effects are avoided, remedied or mitigated, including where these would compromise or foreclose:*
 - a. *existing or consented regionally significant infrastructure;*
 - b. *options for accommodating the consolidated growth and development of existing urban areas;*
 - c. *the productivity of the region's soil resources, without regard to the need to make appropriate use of soil which is valued for existing or foreseeable future primary production, or through further fragmentation of rural land;*
 - d. *the protection of sources of water for community supplies;*
 - e. *significant natural and physical resources;*
2. *avoid or mitigate:*
 - a. *natural and other hazards, or land uses that would likely result in increases in the frequency and/or severity of hazards;*
 - b. *reverse sensitivity effects and conflicts between incompatible activities, including identified mineral extraction areas;*

and
3. *integrate with:*
 - a. *the efficient and effective provision, maintenance or upgrade of infrastructure; and*

b. transport networks, connections and modes so as to provide for the sustainable and efficient movement of people, goods and services, and a logical, permeable and safe transport system.

123. This proposal does enable development of an area adjoining an existing urban area therefore there is merit in enabling development of this land.
124. There is very little chance of any reverse sensitivity effects from this proposed industrial zoned land on existing activities either adjoining or surrounding the site.
125. The transport logistics for this proposal will be linked to the existing road network through the Ashburton Business Estate to the south and Fairfield Road connection to the north. This roading connection was purposely designed through the site. Specific details around this are included in the Abley Traffic Report annexed to this application. This includes consultation with NZTA with regards to future traffic movements that would indirectly access State Highway 1.

5.3.3 Management of development (Wider Region)

To ensure that substantial developments are designed and built to be of a high-quality, and are robust and resilient:

- 1. through promoting, where appropriate, a diversity of residential, employment and recreational choices, for individuals and communities associated with the substantial development; and*
 - 2. where amenity values, the quality of the environment, and the character of an area are maintained, or appropriately enhanced.*
126. Number 2 is relevant here where the development will maintain amenity through good roading and site design including in retention or addition of landscape plantings and stormwater management area.

5.3.5 Servicing development for potable water, and sewage and stormwater disposal (Wider Region)

Within the wider region, ensure development is appropriately and efficiently served for the collection, treatment, disposal or re-use of sewage and stormwater, and the provision of potable water, by:

- 1. avoiding development which will not be served in a timely manner to avoid or mitigate adverse effects on the environment and human health; and*
 - 2. requiring these services to be designed, built, managed or upgraded to maximise their on-going effectiveness.*
127. The proposed development will be fully serviced with reticulated wastewater and high-pressure water. In terms of stormwater management this will include some on site treatment and disposal for roof water and/or land-based treatment for hardstand stormwater. Details of this are included in the infrastructure report annexed to this application.

5.3.8 Land use and transport integration (Wider Region)

Integrate land use and transport planning in a way:

- 1. that promotes:*
 - a. the use of transport modes which have low adverse effects;*

b. the safe, efficient and effective use of transport infrastructure, and reduces where appropriate the demand for transport;

2. that avoids or mitigates conflicts with incompatible activities; and

3. where the adverse effects from the development, operation and expansion of the transport system:

a. on significant natural and physical resources and cultural values is avoided, or where this is not practicable, remedied or mitigated; and

b. is otherwise appropriately controlled.

128. The transport layout for this proposal will be safe and efficient and as the roading proposed and as shown on the ODP. The detailed traffic assessment from Ableys provides the necessary detail regarding the avoidance of conflicts and mitigation for the traffic effects.

Operative Ashburton District Plan

129. The Ashburton District Plan promotes the sustainable management of the Ashburton District through the use, development and protection of natural and physical resources. The District Plan identifies issues, and each issue has a relevant set of objectives, policies and rules. The zone statement for the Business E zone is.

5.3.5 Business E This zone provides for medium to heavy industrial activities that may create adverse environmental effects such as high levels of noise, dust and heavy truck movements: in addition, to other activities including ancillary offices, storage and warehousing activities. Industrial activities often prefer to locate away from urban areas where reverse sensitivity may curtail opportunities for expansion and people may be affected by excessive noise and trucks accessing sites. It is nevertheless desirable for industrial activities to be located adjacent to principal road networks or railway lines that allow ease of transportation of goods without utilising local roads.

The Business E Zone is characterised by large utilitarian buildings built up to internal boundaries with a minimum setback from roads. Buildings will often be enclosed by security fencing with signs displayed in conjunction with a business. Land surrounding buildings may be used for car-parking and outdoor storage and may or may not be sealed. Industrial areas are not therefore areas of high visual amenity with on-site development related only to the operational needs of the business.

130. This Plan Change will introduce a Business E zone to the site. The purpose of this zone is to provide for industrial and service activities on the land as there is limited additional land available for these activities with the adjoining Business E zone on the Ashburton Business Estate progressing to the extent that available land may be come limited within the medium term based on the current levels of occupancy.
131. The Plan Change proposes to amend the text from the District Plan through additional rules and changes to zone description, explanation, assessment matters and the reasons for rules in Chapters 5 and 9 as detailed earlier in this application. It is considered that this Plan Change is in keeping with the policy direction of the District Plan.

Assessment of Ashburton District Plan - Objectives and Policies

Objective 5.1: Business Area Development and Effects

The contribution of business activities to the economic and social wellbeing of the district is recognised and provided for,

1. commercial activities and retail activities primarily focused to support vibrant and viable centres, and

2. business activities able to operate efficiently and effectively within the district's business zones as subject to environmental standards which reflect their function, location and role.

Policies

Policy 5.1E

Differentiate and manage heavy and noxious industrial activities that have the potential to create adverse environmental effects and ensure there are appropriately located areas where they may establish and operate efficiently and effectively.

Policy 5.1F

Avoiding an accumulation of activities which together would generate significant pedestrian activity on State Highway 1, in order to prevent pedestrian/vehicle conflicts and maintain safety.

132. The proposal will be undertaken within the requirements of the Business E zone rules except where there are proposed changes as detailed in this application. Any heavy or noxious type of activities will be in accordance with the relevant rules of the Business E zone.
133. In accordance with Policy 5.1F, there will be no accumulation of pedestrian movement because of the development. This is due to the nature of the proposed activities and the likelihood that individuals will be in vehicles in terms of movements into and out of the zone.
134. In order to ensure safe and functional operations, the development is positioned to efficiently serve the wider community. The development ensures convenient access is available for the intended activities, thus achieving the intentions of Policy 5.1F.
135. The location of the proposed activities in this part of Ashburton will not significantly detract from the amenity of the adjoining area or the consolidation of the inner retail area of central Ashburton.

Objective 5.2: Qualities of Business Areas

Business areas that are pleasant places to visit and work within.

Policy 5.2B

Ensuring the frontages of sites for industrial and service activities present an attractive, landscaped aspect to the street.

The requirements for landscaping will be in accordance with relevant rules for the Business E zone. There is not proposal to change or alter those rules.

Policy 5.2C

Ensuring noise levels within business areas enable the functioning of anticipated activities, whilst remaining pleasant places to visit and work within.

136. Considering the nature of this Business E Zone, and the activities that have been and can be undertaken by the applicants over this current Business F zone, the proposal will not lead to an excessive level of noise disturbance.
137. Although the proposed activities generate traffic noise, this is expected to comply with the criteria of the Operative District Plan's Business Zone noise levels given the background or ambient noise being reasonably high due to the proximity to the State Highway and activities in the surrounding environment.
138. Considering the nature and scale of the activities proposed being no retail activities proposed or rather, any retail would be required to meet the rule criteria for the Business E zone. This development will not detrimentally affect the function, integrity, convenience and viability of the more specialty shops and business within the inner commercial areas of Ashburton.
139. Therefore, it is considered that the intent of the policies is not tested through amenity of adjoining areas, by this proposal.

Amend Policy 5.2D to include in *italics*

Within the Business E zone at the Talleys Fairton site

- *That any development conforms with the Outline Development Plan in Appendix 5.6*

Objective 5.3: Effects of Business Areas on Surrounding Amenity

Areas of business activity which do not detract from the standard of amenity in adjoining areas.

Policy 5.3A

Protecting residential and rural environments by:

- *imposing the residential standards for height and admission of sunlight to buildings on sites adjoining residential areas.*
- *imposing the residential standard for noise on activities adjoining residential areas.*
- *preventing the unacceptable spill of light onto residential sites from business activities.*
- *requiring landscape planting along the boundaries of business sites adjacent to residential sites to protect the visual amenity of the residential areas and rural areas e.g., Business F Zone.*

Amend Policy 5.3B to include

Enabling future commercial and industrial opportunities, principally in the Ashburton Business Estate, Talleys Fairton and Riverside locations, by requiring:

- any development in the Ashburton Business Estate is carried out in accordance with the provisions of the Outline Development Plan for that area so as to ensure the protection of the amenities and quality of the environment in the adjoining Residential D Zone to the south and west;
- a landscaped buffer be provided between residential and business activities in the Ashburton Business Estate;

140. Although there are residential properties within the site the closet other residential buildings are those in the Fairton township to the northeast however they are screened from the site to a significant degree by existing shelter planting and both community facilities being the Fairton Hall and School sites.
141. Overall, it is not anticipated that either the residential or rural environments will be compromised by activities that are proposed for this location.
142. Considering the above, it is considered that the proposal is consistent with the policies and objectives of the District Plan.

Objective 9.1: Effects of Subdivision and Development

To ensure that subdivision and associated development maintains and enhances amenity, character, and natural and visual qualities of the environment, while enabling the effective and efficient use of land.

Policy 9.1A Encourage and facilitate innovative design that enables subdivisions to connect with, reflect and enhance the surrounding environment, as well as creating desirable places to live, work and enjoy.

143. A future subdivision that is created about the road network, will provide a design that will need to be developed in accordance with demand for allotments of varying sizes to mee the demand ad requirements of the future tenants or purchasers.

Policy 9.1B Ensure that the size, shape and location of the boundaries of allotments is compatible with the physical characteristics of the site including the underlying topography.

144. The proposed shape and location for the subdivision will be compatible with the physical characteristics of the site.

Policy 9.1H Promote a consolidated urban form in managing growth consistent with:

- *achieving effective and efficient provision and use of infrastructure, including essential services and transport links.*
- *ensuring a scale and intensity of development consistent with other requirements of the Plan; and*
- *maintaining and enhancing neighbourhood qualities, character and amenity values reflecting community expectations.*

145. As detailed in this assessment there is ability to connect to existing reticulated services as they will be made available within the road network and appropriate stormwater management on site for development and stormwater detention areas as shown adjoining the ODP area.
146. The scale and intensity are appropriate considering the sites location. The current Business F zoning is not considered appropriate based on the ability to service this land and its size and scale adjoining existing Business E zoned land.
147. The character of the neighbourhood is one of mixed use as detailed earlier in the application however within a low-speed zone and on the urban business fringe of Ashburton this proposal

will not detract from the neighbourhood amenity where a high standard of roading and building development will be undertaken on this land.

Objective 9.2: Providing for Servicing of Subdivisions

To ensure the provision of the necessary services to subdivided allotments in anticipation of the likely use of land, while managing adverse effects on the environment.

Policy 9.2A

Provide safe and efficient vehicle access to all properties in subdivisions by controlling the width and number of rights of way and cul-de-sacs.

148. The proposal will have only one road through the development with provision for a connection road (Road 2 on the ODP). There is other private internal roading already established as part of the former Silver Fern farms land and the current Talley's use. Any rights of way created will be internalised to the development and part of the future subdivision if and as required.

Policy 9.2C

Require that all new lots be provided with a means of connection to a reticulated potable water supply system, where such a system is available, or alternatively can be supplied from a bore or community supply and ensure that water supplies are of a sufficient capacity and a potable standard, and there is capacity and sufficient water pressure for firefighting requirements.

149. The infrastructure report details the existing water supply network available to the site and the proposed extensions required to enable high pressure water supply to the site for the subdivision to enable connections for the allotments.
150. In terms of firefighting capability, water supply network modelling may be required to confirm the development is able to be serviced for Fire Fighting Water Supply in accordance with the requirements of the Code.

Policy 9.2D

Ensure disposal of stormwater in a manner which maintains or enhances the quality of surface and ground water, as well as avoids inundation of land within or beyond the subdivision.

151. There will be stormwater design factored into the development as detailed within the infrastructure report.

Policy 9.2E

Ensure that anticipated development is provided with a connection to a reticulated sanitary sewer system, where such a system is available, or onsite or standalone communal treatment systems can be installed, subject to any discharge consents required from the Canterbury Regional Council, whilst avoiding or managing adverse effects on the environment, in particular the contamination of ground water.

152. The proposal is to connect to the existing DN150 or DN225 in the Ashburton Business Park as detailed in the infrastructure report. Consultation with ADC Assets had been undertaken to determine capacity and ability to undertake this connection.

Policy 9.2F

Ensure that in the Residential and Business Zones adequate provision is made for the supply of reticulated energy and communication facilities and that the method of reticulation is appropriate to the amenities of the area.

153. There is both power and telecommunication networks, ability to connect to electricity and telecommunications for this proposed development.

Policy 9.2J

Expect the use of outline development plans where large areas of land are to be rezoned or redeveloped, whether by Council or a developer, to provide a level of certainty for the community as to connections to the local road network, layout, location and area of open space.

154. An Outline Development Plan (ODP) has been proposed for this development more so that the road connection for the site is shown and that services can be provided to the development. The road connection is substantially formed within the site and any upgrading internally will be undertaken as required and if necessary, during subdivision stage.

Consultation

155. In terms of Clause 6(1)(f) of the Fourth Schedule of the RMA, persons affected by the proposal are to be identified, along with *the consultation undertaken, if any, and any response to the views of any person consulted.*

The applicant has however undertaken consultation with the following groups.

- Ashburton District Council – Assets Department
 - Ashburton District Council – Planning department.
 - EA Networks – Electricity and communications
 - NZTA
156. The purpose of this consultation was to outline the detail as to why the Business E zone sought for this site is appropriate and to get any feedback from the consultation as to any other matters that need to be considered.
157. No formal consultation has been undertaken with adjoining or surrounding landowners to date.
158. Albeit the 4th Schedule to the Resource Management Act 1991 relates to resource consents, the purpose relates to the assessment of effects. Under Clause 6 (3) of the Fourth Schedule this states.

To avoid doubt, clause 6 (1) (f) [of the Fourth Schedule] obliges an applicant to report as to the persons identified as being affected by the proposal, but does not -

- (a) oblige the applicant to consult with any person; or*
- (b) create any ground for expecting that the applicant will consult with any person.*

159. It should also be noted that, under Clause 25 of Part 2 of the First Schedule of the RMA, should the Council agree to accept the plan change request, the proposal must be publicly notified for submissions. Public notification is a form of consultation, and the number of parties that will be made aware of the proposal will be much greater than those with whom the applicant can or will consult with directly.

STATUTORY REQUIREMENTS OF SECTION 32 ASSESSMENT

160. Section 32 of the Resource Management Act requires evaluation of a private plan change by the person making the request. The evaluation, carried out under Section 32 of the, must examine:

- (a) *the extent to which each objective is the most appropriate way to achieve the purpose of the Act; and*
- (b) *whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.*
The evaluation is required to take into account:
 - *The benefits and costs of policies, rules, or other methods; and*
 - *The risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.*

161. Specifically, section 32(2) requires identification and assessment of benefits and costs of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions including opportunities for:

- Economic growth that are anticipated to be provided or reduced; and
- Employment that are anticipated to be provided or reduced.

162. The Guidance Note on section 32 analysis on the Quality Planning website makes the following statement:

163. *Appropriateness - means the suitability of any particular option in achieving the purpose of the RMA. To assist in determining whether the option (whether a policy, rule or other method) is appropriate the effectiveness and efficiency of the option should be considered:*

- *Effectiveness - means how successful a particular option is in addressing the issues in terms of achieving the desired environmental outcome.*
- *Efficiency - means the measuring by comparison of the benefits to costs.*
(Environmental benefits minus environmental costs compared to social and economic costs minus their benefits).

164. In this case it is the appropriateness of rezoning rural land for business use that needs to be examined.

Objectives and Policies of the Ashburton District Plan

165. The Proposed Plan Change does seek to alter some objectives and policies of the Ashburton District Plan. Accordingly, examination under Section 32(3)(a) of whether the objectives of the District Plan are the most appropriate way of achieving the purpose of the Resource Management Act is required.
166. However, because the District Plan is operative, it is assumed that the objectives are the most appropriate way to achieve the purpose of the Act. It is also assumed that as no policies are being added or altered, that they are the most appropriate means of achieving the objectives of the District Plan.
167. Although an assessment of the appropriateness of the objectives and policies of the Plan is not required, it is worthwhile to consider the proposed Plan Change against the objectives and policies contained within the Ashburton District Plan relating to providing for urban growth. An assessment of these objectives and policies has been undertaken earlier in this assessment and it concludes that requested rezoning of the site would meet the outcomes sought for urban growth and new residential areas.
168. Overall, it is considered that the Proposed Plan Change is consistent with the strategic outcomes sought for Business development by Ashburton District Council. Additionally, the resulting amenity is considered to be consistent with the outcomes required under the District Plan.
169. Given the conclusions within Sections 5 on the effects of the proposal on the environment and the above assessment, the proposed rezoning of the site is considered to be an appropriate means of achieving the outcomes sought by the objectives and policies of the District Plan.

Assessment of the Benefits and Costs of the Proposed Change

170. To assess the effectiveness and efficiency of the proposed rezoning, the benefits and costs of the proposed Plan Change, together with an examination of the risks of acting or not acting based on the information provided is required. To determine the relative benefits and costs of the proposed change, options other than the proposal should also be examined. In terms of this proposal the options considered are:
- Option 1 – Leave the area zoned Business F
 - Option 2 – Rezone the land as Business E by private plan change.
 - Option 3 – Wait for Council to rezone land as a Business E Zone
 - Option 4 – Apply for resource consent for proposed subdivision and development.
171. The following is an assessment of these options.

BENEFITS AND COSTS OF OPTION 1 – LEAVE THE AREA ZONED BUSINESS F

<u>BENEFITS/ADVANTAGES</u>	<u>COSTS/DISADVANTAGES</u>
• Maintains the existing character of the area. • Allows the Council to implement plan	• The current Business F zone was a specific zone for Silver Fern Farms meat processing and ancillary

change proposal within their own timeframe as part of a District Plan review. Retail soil in situ for future use.	activities. - Does not fulfil the District Plan's objective of a process to rezoning land. - Does not implement any Proposed Change to any CRPS which seeks a settlement pattern that provides sufficient land for future growth. - Reduces the level of choice for potential purchasers or tenants of Business allotments. - Does not contribute to the cost of existing reticulation of services.
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BENEFITS AND COSTS OF OPTION 2 – REZONING LAND AS BUSINESS E BY PRIVATE PLAN CHANGE

<u>BENEFITS/ADVANTAGES</u>	<u>COSTS/DISADVANTAGES</u>
- Implements the National Policy Statement on Urban Development Capacity - The area is not dependent on the development of other land to provide access or infrastructure, such as stormwater disposal. - Provides an alternative for prospective tenants or purchasers of allotments within Ashburton District and elsewhere. - Economic benefit to Council from larger rating base through additional properties being added upon subdivision, and the payment of development contributions for new infrastructure. - Provides long-term certainty for both the developer and potential purchasers as to the use of the land. - Supports and extends existing Council reticulated services, e.g., sewer system and water supply. - Costs of assessments and development of ODPs fall on the developer, not the Council.	- Change in character of the area from Business F to E. - Increase in traffic generated within and around Ashburton. - Does not consider other land that may be suitable to provide for growth. - Costs of Plan Change and development

BENEFITS AND COSTS OF OPTION 3 – WAIT FOR COUNCIL TO REZONE LAND AS BUSINESS E

Benefits/Advantages	Costs/Disadvantages
• Implements the National Policy Statement on Urban Development Capacity • Provides an alternative for prospective purchasers of industrial allotments within Ashburton District and elsewhere. • Economic benefit to Council from larger rating base through additional properties being added upon subdivision, and the payment of development contributions for new or existing infrastructure upgrades. • Provides long-term certainty for both the developer and potential purchasers as to the use of the land at the southern end of Ashburton where there is limited supply of suitable land. • Supports and extends existing Council reticulated services, e.g., sewer system and water supply.	• Could result in uncertainty and delay regarding rezoning for urban growth as Council may not want to be directly involved in rezoning land through no District Plan review or otherwise. • Council would have to determine which land is to be rezoned and so undertake detailed comparative analysis. • Council would have to undertake detailed assessments (e.g., geotech, soil contamination,) which are a cost to the ratepayer. • Council would have to develop ODPs for the rezoned areas which are not something it normally undertakes, and which would be at a cost for ratepayers. • Change in character of the area from Business F to Business E. • Increase in traffic generated within and around Ashburton.

BENEFITS AND COSTS OF OPTION 4 – DEVELOP THE LAND BY RESOURCE CONSENT

• Council has the ability to place stricter controls on the development through consent conditions than may be possible through a plan change. • Potential for greater environmental benefit through Council having greater control over development and being able to require some land for environmental compensation for the use proposed.	• Potential social cost arising from lack of long-term certainty for future purchasers and adjoining neighbours as to the use of the land, as additional consents and/or variations to alter conditions can be sought. • Potential and future purchasers would need to obtain consent if they were to alter uses, for example seeking greater coverage or building heights. • Less flexibility in being able to develop the land. • Possibly higher costs to develop land through the placing of tighter controls on the development by way of strict conditions on a consent. • Unwanted precedent in terms of allowing Business E light and heavy industry on what is Business F land through consent only.
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172. The above assessment highlights that the advantages and benefits of rezoning this area of land for Business related use (Option 2) by way of private plan change outweigh the potential costs and disadvantages. The costs or disadvantages of the other options indicate that they are not the most appropriate method.

Effectiveness

173. In determining the effectiveness of the Plan Change and other options to achieve the objectives, it is considered appropriate to include within “the objectives” the objectives of the relevant broader policy documents. These matters are considered in this application. They set out, at a strategic level, how growth should be provided for within the Ashburton District.
174. On this basis the proposed Plan Change, Option 2, is assessed to be the most effective to achieve the objectives of the District Plan, and of implementing the proposed change in accordance with the Canterbury Regional Policy Statement.
175. The same rezoning could be achieved through incorporation of a proposed rezoning into a review of the Ashburton District Plan should that occur. However, there is no immediate proposal to review the current District Plan at this time and if a review was an option, it may not be for the same or similar zone as sought here.
176. Therefore, the only avenue is the initiative of rezoning to be taken by landowners who are familiar with the detailed characteristics of the land block as well as the challenges of developing them in a way that ensures integration with existing business development or land able to be developed for business/industrial use.
177. The proposed Plan Change is the only method that can ensure all the following:
- Business development of an appropriate scale and density
 - Development in accordance with an outline development plan (ODP)
 - Integration of development with existing infrastructure
 - Amenity standards to be achieved in final development.
 - Enables the block of land to be planned, designed and physically constructed in a timely manner to meet demand for new business development.

Efficiency

178. In determining efficiency, it is necessary to compare the costs and benefits of the four options listed in the tables above. These costs and benefits relate to a variety of matters including environmental, process and land use compatibility. In relation to all these matters Option 2 has a greater number of benefits/advantages as compared to Options 1, 3 and 4 and Option 2 has the same or lesser costs/disadvantages.
179. However, based on the scale of the development Option 4 could have been pursued based on a limited number of allotments being created for the development and existing developments that already have resource consents that are within the ODP area, namely the Fairfield Freight Hub and the Talley’s Solar Farm development. That said, the issues that arise, as detailed in the table for option 4, create some disadvantages and potential issues related to activities changing over time and changes to resource consents being sought as required which creates additional administration and readdress of effects by the Council on given situations.

Overall Assessment

180. Based on the assessment above, the overall conclusion is that the Proposed Plan Change is an appropriate method for achieving the objectives and policies of the District Plan than the existing plan provisions or the alternatives discussed in this assessment. It is also concluded that the environmental, social and economic benefits of the Proposed Plan Change outweigh any of the costs. On this basis, the proposed rezoning is an appropriate, efficient and effective means of achieving the purpose of the Resource Management Act.

OUTLINE DEVELOPMENT PLAN

181. An Outline Development Plan has been prepared as part of the Plan Change to ensure several outcomes. In particular, it has been designed to secure:
- (i) integration of the subject land as part of the Ashburton District Development Plan.
 - (ii) a movement network (roads, stormwater management) which integrates with existing development
 - (iii) proposed stormwater management areas that address stormwater management in the context of the subject land, and
 - (iv) delivers additional amenity and design outcomes in respect of the subject land including a transport network with linkages that will readily meet the needs of all transport modes.
182. Outline Development Plans are generally considered to be simplification of a development framework. In this case, a planning process which will sustainably develop the site and provide for the needs of the wider District.

CONCLUSION

183. The applicant requests that the Ashburton District Council change the District Plan by rezoning the area of land identified as Business F being bounded by JB Cullen Drive, the main South Railway line and Fairfield Road and adjoins the existing Business F zone owned by Talley's Ltd.
184. The District Plan objectives, policies and performance standards are assessed as sufficient to ensure that any actual or potential adverse environmental effects from any new residential activities establishing on the site in the future will not be more than minor.
185. It is therefore considered that the adoption of the Proposed Plan change will not affect the ability of the District Plan to continue to meet the purpose and principles of the RMA.

186. In terms of Clause 25(2)(b) of Part 2 of the First Schedule of the RMA, it is therefore requested the Council accept the proposed plan change request and proceed with public notification as soon as possible.

ANNEXURE 1: RECORDS OF TITLE

ANNEXURE 2: LOCATION OF PROPOSED PLAN CHANGE

ANNEXURE 3: PROPOSED OUTLINE DEVELOPMENT PLAN

ANNEXURE 4: INFRASTRUCTURE REPORT

ANNEXURE 5: PLANNING MAP

ANNEXURE 6: TRAFFIC IMPACT ASSESSMENT

ANNEXURE 7: SOIL CONTAMINATION REPORT

