



Ref: A3289732

18 December 2020

Te Puawai Developments Limited
C/- Bonisch Consultants
PO Box 1262
INVERCARGILL 9840

Attention: Christine McMillan

Via email: christine@bonisch.nz

Dear Christine

FURTHER INFORMATION REQUEST – REQUEST BY TE PUAWAI DEVELOPMENTS LIMITED FOR A PRIVATE PLAN CHANGE TO THE OPERATIVE INVERCARGILL CITY DISTRICT PLAN

Applicant name: Te Puawai Developments Limited
Activity Description: Rezoning land at 514 Tramway Road, and 380 & 426 Tramway Road, Invercargill

Council officers have undertaken an initial review of the application received for the proposed Te Puawai plan change. There are a range of matters on which Council officers seek further information to better understand the proposal, its effects, and measures proposed by the applicant to address these effects. This information is requested under clause 23(1) of the First Schedule to the Resource Management Act 1991. The further information requested is outlined as follows:

1. Proposed Performance Standards

The Plan Change application contains a suite of proposed performance standards, the most significant of which relate to the proposed Medium Density Residential (RES1A) zone and the proposed Retirement Village precinct. While Council considers the inclusion of such performance standards within the Te Puawai plan change area to have merit in principle, the following information is requested:

- Council seeks to better understand how the proposed performance standards combine to achieve the objectives of the plan change and result in appropriate urban design outcomes. It is therefore requested that the applicant provide an assessment of the rules, or classes/groupings of rules, in terms of how they achieve these objectives. It is suggested that this assessment be undertaken in accordance with guidance provided under Section 32 of the RMA.
- It is understood that the proposed performance standards have been influenced by the performance standards contained within the Christchurch City District Plan. Please provide examples of where development adhering to these performance standards has been undertaken, and include commentary or

assessment on how these developments have contributed to appropriate urban design outcomes.

Given the scope of the proposed performance standards it is considered there will be efficiencies in the applicant's planning team discussing the above matters with Council personnel directly. The purpose of such discussion would be to refine the suite of proposed performance standards in the context of the existing Invercargill City District Plan to ensure that development is appropriately provided for within the Te Puawai site, and comprehensively respond to the above matters.

2. Ratio of proposed RES1 to RES1A Zoning

The application refers to a shortage of housing in Invercargill, and links demand for housing to the establishment of the Southland Housing Action Forum (SHAF). It is requested that the applicant provide commentary from the SHAF on the proposed plan change. In particular, Council seeks the SHAF's view on the ratio of proposed RES1 to RES1A zones in terms of delivering outcomes they are seeking regarding housing supply.

Alternatively, if the applicant is unable to contact the SHAF for comment, please provide some supporting commentary supporting the statement that there is a need for the scale of housing provided for by the proposed Plan Change.

3. Infrastructure Methodology

Council seeks to ensure that infrastructure methodologies promoted within the application would be implemented throughout the development of the Te Puawai site. It is preferred that provisions relating to these methodologies be included in the Invercargill City District Plan (ICDP). It is therefore requested that the applicant provide information on how such provisions can be incorporated into the ICDP.

4. Timing of Infrastructure

It is presumed that some infrastructure proposed in the application to mitigate the effects of development of the Te Puawai site may not be required until a certain level of development is reached. Please provide details on the timing of, or triggers for, when key infrastructure is likely to be required to mitigate the effects of the proposal. The requested details should include, but not necessarily be limited to, provision of key transport and 3 waters infrastructure.

5. Water Supply

Council's Manager – Water notes that the Te Puawai site is located adjacent to the south east corner of the water reticulation system, far away from main pumping stations. He considers that development of the site would likely exert a demand that would adversely impact on the ability to transfer water down the Bluff pipe trunk main.

The main issue for provision of water supply to the site is to what degree infrastructure outside the site might need to be upgraded. Fundamental in determining such requirements is having a hydraulic model of the water reticulation network. Council is currently developing a hydraulic model, however it is estimated that this might only become available toward mid-2021.

The availability of Council's hydraulic model notwithstanding, the application does not include a commensurate alternative hydraulic model nor does it include details of what wider water supply upgrades are necessary to service the site. In this instance, additional infrastructure required to provide adequate water supply to the site might include installation of additional pumping capacity, or possibly a new reservoir and pump station constructed in the near vicinity. Such infrastructure upgrades are not presently planned or funded by Council, nor do we have a development contribution scheme in place to recover costs if it is required.

In terms of water supply connections, the proposed design concept indicates connecting directly into Council trunk mains in multiple locations. Links into the trunk main system are typically limited to just a few locations to preserve downstream capacity, whereas there is less of an issue linking in much more frequent intervals off the distribution system. In this case the trunk main system is connected at Centre Street and so it is unlikely that any more connections will be permitted other than one off Tramway Road. It is therefore unlikely that two proposed link-ins off Rockdale Road will be permitted.

It is requested that the above matters be resolved with Council's Water Manager in order to progress the proposed plan change application. It is also requested that the applicant's 3 Waters Servicing Assessment be amended to accommodate the matters raised above in relation to water supply once they are resolved. The applicant is invited to discuss these matters in more detail with Council's infrastructure and planning personnel directly.

6. Stormwater

Council's Manager – Engineering Services notes that disposal of stormwater from the Te Puawai site will require a discharge consent from Environment Southland. It is preferred that this be undertaken concurrently with the plan change. It is therefore requested that the applicant confirm that they will undertake preparation of this consent application and provide details of its timing, including how this might tie in to the plan change process.

As noted above in point 3 above, Council seeks to ensure that the infrastructure methodologies promoted within the application will be implemented throughout the development of the Te Puawai site. In terms of stormwater, Council is particularly interested in the treatment outcomes and low impact design principles promoted within the application. It is requested that the applicant provide information on how such provisions can be incorporated into the ICDP.

7. Wastewater

The principle matter Council requires information on in respect of wastewater is the timing of, or triggers for, any required upgrades to downstream infrastructure. Please see point 4, above, regarding Council's request for this information.

8. Reserves

Council's Manager – Parks Planning requests information on the proposed area of the reserves shown on the plan. Parks request this information to ensure that any land swaps or agreements required to facilitate development of the Te Puawai site are fair and equitable.

They also comment that the number, and configuration, of smaller parks and street trees depicted on the Concept Master Plan within the supplied Urban Design Report may not be supported by Council. While these matters may best be dealt with at the time of any future subdivision or development proposal, it is requested that the applicant provide commentary on this matter as it may impact on the Concept Master Plan and associated Urban Design Report supplied with the application.

9. Roding

Council's Manager – Roding has requested that the implications of the existing speed limits remaining on Rockdale Road and Tramway Road be considered. The applicant should provide an assessment of what a safe speed on Rockdale Road and Tramway Road might be given available sight distances at the proposed intersections onto these roads.

Please also note the request for the timing of roading infrastructure as outlined in point 4, above.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Grant Fisher', is written over a light blue circular stamp.

Grant Fisher
SENIOR POLICY PLANNER