

Before the Selwyn District Council

under: the Resource Management Act 1991

in the matter of: Proposed Private Plan Change 66 to the Operative
District Plan: Maddisons Road, Rolleston

and: **Rolleston Industrial Developments Limited**
Applicant

Statement of Evidence of Timothy Maurice Phillip Carter
(Company)

Dated: 23 July 2021

Reference: JM Appleyard (jo.appleyard@chapmantripp.com)
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STATEMENT OF EVIDENCE OF TIMOTHY MAURICE PHILLIP CARTER

INTRODUCTION

- 1 My full name is Timothy Maurice Phillip Carter.
- 2 I am a director and owner of Rolleston Industrial Developments Limited (*RIDL*), a subsidiary of Carter Group Limited (*Carter Group*).
- 3 I hold an honours degree in civil engineering and master in engineering management both from the University of Canterbury. I have been in public office and have been, and still am, director of a number of significant public and private companies.
- 4 I have been involved in investment and development projects for the last 20 years.
- 5 I have been authorised by RIDL to provide evidence in relation to Proposed Private Plan Change 66 (*PC66*). I am familiar with the application and additional documents for PC66 and I have also read the submissions, further submissions, and section 42A report (*Officer's Report*).

SCOPE OF EVIDENCE

- 6 My evidence addresses the following:
 - 6.1 Carter Group interests in Selwyn District;
 - 6.2 Industrial land availability;
 - 6.3 The PC66 site; and
 - 6.4 Support from Lyttelton Port Company.

SUMMARY OF EVIDENCE

- 7 Carter Group has a range of significant investments in the Selwyn District. The most significant being the IPort Business Park. The rezoning of the Plan Change site to Business 2A Zone would provide for an extension of the IPort Business Park.
- 8 The PC66 site location is the most logical extension for the IPort and provides a unique opportunity for the potential to extend LPC's rail siding either for the development of an extended Midland Port, or the potential for other investors (such as large logistics operators) to establish with an open border and access to the rail siding and Midland Port.
- 9 Carter Group/RIDL are of the view that Our Space and business capacity assessments to date have completely failed to take into account the significant role Rolleston has in terms of strategic freight movements. It is

widely known and accepted that this land has always been earmarked for industrial expansion as far back as 2013. Rolleston is a natural aggregation point of freight and is a logical place for logistic warehouses and storage of primary products.

- 10 Carter Group/RIDL have received letters of support from LPC for this plan change.

CARTER GROUP INTERESTS IN SELWYN DISTRICT

- 11 Carter Group has a range of significant investments in the Selwyn District. Of most relevance to the current application is IPort, located to the west of the PC66 site:
 - 11.1 A \$500 million business park on 122 hectares of land located between Lyttelton Port Company's (*LPC*) Midland Port and the IZone industrial park, Rolleston.
 - 11.2 IPort commenced with the sale of 27 hectares to Lyttelton Port of Christchurch to build its inland port – MidlandPort – which also links directly to rail.
 - 11.3 IPort provides a diversity of land offering including small to large unencumbered land parcels for sale, through to large design build and lease options with a range of sites sharing an open boundary with the rail siding and Midland Port. For the avoidance of doubt, all of RIDL's sites are available for unencumbered sale by potential owner occupiers. With no build ties.
 - 11.4 It is strategically positioned at the intersection of the South Island's major freight arteries – the South Island Main Trunk Railway Line, the Midland Railway Line, State Highway 1, and Christchurch's new Southern Motorway which opened in 2020. These arteries provide easy access to Lyttelton Port and Christchurch Airport – the major freight links into and out of the region.
 - 11.5 Efficiencies at MidlandPort include the direct access to international markets through the 14 shipping lines and nine shipping services that call at Lyttelton Port.
- 12 The industrial land available at IPort is split into two different types. One third of the land is actively being sold to allow businesses who wish to be owner occupiers to establish. The remaining two thirds we are doing design builds and leases for businesses who do not wish to have their capital tied up in bricks and mortar. Carter Group is a long term investor committing significant amounts of capital and commitment to the long term prosperity of the Rolleston industrial area.

- 13 Carter Group, through RIDL, is seeking that the rezoning of the PC66 site in order to extend IPort and provide more land with open boundaries to Midland Port.

INDUSTRIAL LAND AVAILABILITY

- 14 The Officer's Report and the economic review prepared as part of that report by Mr Foy, notes that there is no information provided as to the 'need' for further rezoning of industrial land.
- 15 However, I understand that these conclusions have been based on the findings in "Our Space 2018-2048: Greater Christchurch Settlement Pattern" (*Our Space*) that there is sufficient industrial land zoned across Greater Christchurch to meet anticipated demand through to 2048.
- 16 Carter Group participated in the Our Space process and in particular sought that more land be identified as 'greenfield priority area – business'. However, the decision makers in that process accepted the Council's Capacity Assessment and declined to identify any further business (which included industrial) land, as it considered based on that assessment that there was a significant oversupply of industrial land in Greater Christchurch generally.
- 17 The decision on Our Space does, however, recommend that more work be done by the Greater Christchurch Partnership in the next assessment in relation to demand and location of industrial and business land in close proximity to freight hubs. This has not yet occurred.
- 18 Carter Group are of the view that Our Space and business capacity assessments to date have completely failed to take into account the significant role Rolleston has in terms of strategic freight movements.
- 19 It is further noted that the Plan Change site was identified as early as 2013 in the Land Use Recovery Plan (*LURP*) for Canterbury. This is the reasons the site is included in the Projected Infrastructure Boundary. It is widely known and accepted that this land has always been earmarked for industrial expansion. The land was purchased by RIDL with the intention of ultimately rezoning it to industrial, as anticipated in the planning documents, and developing it as a part of the IPort Business Park.
- 20 Rolleston is a natural aggregation point of freight and is a logical place for logistic warehouses and storage of primary products. We think this is a fundamental reason why the uptake in land in Rolleston has been a lot higher than any part of Greater Christchurch in the last 10 years.
- 21 The significant role that freight hubs such as this one have need to be taken into account when considering the growth potential, availability, and desirability of industrial land in Rolleston, Selwyn, and Greater Christchurch as a whole.

- 22 Rolleston's position as the major hub servicing not just the Christchurch Metropolitan area, but also the whole of the South Island, has been further solidified and strengthened by the significant roading projects under construction and planned for the area. The Southern Arterial Motorway Stage 2, a \$360 million motorway project, is now open. It has reduced the travel time from Rolleston to Christchurch CBD from 30 minutes to 15. This motorway project was funded by the Waka Kotahi - New Zealand Transport Agency as it was identified as a roading project of national significance.

THE PC66 SITE

- 23 The PC66 site location is the most logical extension for the IPort and provides a unique opportunity for the potential to extend LPC's rail siding either for the development of an extended Midland Port, or the potential for other investors (such as large logistics operators) to establish with an open border and access to the rail siding and Midland Port.
- 24 Recently, Move Logistics have committed to a design build section in IPort with direct open boundary access to the rail siding and Midland Port. This was a critical factor in their move to IPort and has allowed them to make significant savings on costs, particularly in relation to transport costs.
- 25 The PC66 site would be very attractive to this kind of developer as providing logistical, environmental and costs efficiencies. Access to the rail siding and a common boundary with Midland Port would enable non-road worthy port container moving vehicles to reposition containers through the private boundary without having to travel through roads or use less efficient trucks to move containers.
- 26 This is a unique opportunity that I do not believe could be replicated elsewhere.

LYTTELTON PORT COMPANY

- 27 The Officer's Report also notes that while the issues raised in LPC's submission on PC66 have been addressed, there is no express support for the rezoning by LPC.
- 28 RIDL has previously in 2019 received a letter of support from LPC for the rezoning of this site. I attach this as **Appendix 1**.
- 29 This letter was provided to RIDL as part of a package to the Government, to promote the land as a shovel ready project because RIDL were willing to immediately develop it for industrial if it was rezoned. Through that process, RIDL garnered support from LPC (**Appendix 1**), Kiwirail (within their shovel ready application) and RIDL also had support from Development Christchurch Limited. This now brings us to the current Plan Change process, this land is clearly unique, in that it is right beside the boundary of both Midland Port and IPort Business Park. It is the only piece of land that Lyttelton Port can extend their rail siding on from Midland Port

and as can be seen from the shovel ready applications there is clearly efficiency and cost savings in freight movements by having a longer rail siding.

- 30 RIDL has since sought and received a further letter of support from LPC to confirm their position hadn't changed. This was received on 21 July 2021 and confirms that LPC continue to support PC66. I attach this as **Appendix 2**.

Dated: 23 July 2021

Timothy Maurice Phillip Carter

APPENDIX 1

14 February 2019

Rolleston Industrial Holdings

Dear Sir/Madam,

MidlandPort Growth Potential

- 1 We write in support of the rezoning of additional industrial land immediately adjacent to the MidlandPort at Rolleston. An increase in industrial zoned land in this location will support LPC's ability to meet the increase in demand for containerised cargo that is anticipated over the next 20 to 30 years.

Background

- 2 Lyttelton Port Company (LPC) own and operate the MidlandPort, located within the Business 2A zone at Rolleston. MidlandPort became operational in June 2016. The rail connection with the Port improves container freight efficiency, and decreases travel time and freight costs for customers. It also reduces road congestion by removing a significant number of trucks on the Port route.
- 3 MidlandPort is strategically positioned to offer connectivity to all transport modes throughout the South Island. Combined with our extensive facilities and neighbouring developments, a supply chain that includes MidlandPort can be optimised to ensure that containers are moved to and from ports at the lowest cost. Features of MidlandPort's location include:
 - (a) Next to the main trunk rail line and State Highway 1, within 1km of the end of the new Southern Motorway Stage 2.
 - (b) Direct access to Lyttelton Port via a dedicated rail shuttle.
 - (c) Connections to a large number of shipping services and shipping lines, offering direct calls to Australia, Asia, North America and Europe.
 - (d) Rail access to all points West and South of Rolleston.
 - (e) Rolleston is at the heart of the region catering for significant amounts of both export and import cargo.
- 4 During the formative stages of development of MidlandPort, LPC spent an extensive amount of time researching potential locations on the South side of Christchurch that were suitable for an inland port. Rolleston was a logical location for a Lyttelton inland port due to its strategic position at the intersection of South Island's major freight arterials, the South Island main trunk railway line, the Midland railway line (railway to the West Coast), State Highway 1 and Christchurch's new Southern motorway which is due to open in 2019/20.

- 5 LPC looked at a number of potential sites in and around Rolleston in which we could possibly setup an inland port. The MidlandPort site was selected as it was the site where LPC could establish the longest railway siding with direct access to the main South Island railway line. In addition, the MidlandPort site was positioned alongside a large area of vacant industrial land that provided for the development of large freight and logistics providers immediately alongside the Port's boundary. This provided benefits to the Port and our key freight/logistics partners in terms of container handling efficiencies and reduced transportation times and costs. It also allows for reduced reliance on local roads as containers can be transported without needing access to the local road network.
- 6 The total length of railway siding that that can be accommodated on the current MidlandPort is 540m which allows us to load 30 railway wagons. The longer the railway siding, the longer the trains that can be used to service the inland port, which in turn increases efficiency and reduces container transport costs.

Capacity for Growth

- 7 We support Rolleston Industrial Holdings Limited's (RIHL) submission to include the 27ha of land shown on the **attached** plan to be earmarked for future industrial development.
- 8 Our containerised cargo is forecast to increase from about 370,000 teu in 2015 to over 1 million teu by 2041. MidlandPort is part of our long term plan which makes sure we can meet this demand and to ensure we can handle bigger vessels and the increased volume that is expected over the next 20 – 30 years.
- 9 If the RIHL land is rezoned for industrial use, it will allow LPC the potential to extend the railway line by a further 563 metres, allowing the possibility of longer more efficient trains.
- 10 An extension to the rail siding and MidlandPort facility to the north would also extend the length of the shared boundary with vacant industrial land that will allow the contemporaneous further development of large freight and logistics providers, and provide further optimisation of freight handling.
- 11 This 27ha site is the **only** site which would provide LPC with the potential to extend the railway siding resulting in longer trains and lower transport costs between Rolleston and Lyttelton Port. Every container that is transported by rail results in one less movement on the roads, reducing future congestion on the Southern arterial motorway and Brougham Street through to the Port.

Yours faithfully



SIMON MUNT
Marketing Manager

APPENDIX 2

21 July 2021

Rolleston Industrial Developments Limited
Attn. Tim Carter

Dear Tim,

RE: Plan Change 66 – MidlandPort Growth Potential

Further to the Lyttelton Port Company (LPC) submission on Plan Change 66 that addressed specific environmental effects potentially arising from the proposal, we write in general support of the rezoning of additional industrial land immediately adjacent to the MidlandPort at Rolleston.

Background

Lyttelton Port Company (LPC) own and operate the MidlandPort, located within the Business 2A zone at Rolleston. MidlandPort became operational in June 2016. The rail connection with the Port improves container freight efficiency, and decreases travel time and freight costs for customers. It also reduces road congestion by removing trucks on the Port route.

MidlandPort is strategically positioned to offer connectivity to all transport modes throughout the South Island. Combined with our extensive facilities and neighbouring developments, a supply chain that includes MidlandPort can be optimised to ensure that containers are moved to and from ports at the lowest cost. Features of MidlandPort's location include:

- (a) Next to the main trunk rail line and State Highway 1, within 1km of the end of the new Southern Motorway Stage 2.
- (b) Direct access to Lyttelton Port via a dedicated rail shuttle.
- (c) Connections to a large number of shipping services and shipping lines, offering direct calls to Australia, Asia, North America and Europe.
- (d) Rail access to all points West and South of Rolleston.
- (e) Rolleston is at the heart of the region catering for significant amounts of both export and import cargo.

During the formative stages of development of MidlandPort, LPC spent an extensive amount of time researching potential locations on the South side of Christchurch that were suitable for an inland port. Rolleston was a logical location for a Lyttelton inland port due to its strategic position at the intersection of South Island's major freight arterials, the South Island main trunk railway line, the Midland railway line (railway to the West Coast), State Highway 1 and Christchurch's new Southern motorway which is due to open in 2019/20.

LPC looked at a number of potential sites in and around Rolleston in which we could possibly setup an inland port. The MidlandPort site was selected as it was the site where LPC could establish the longest railway siding with direct access to the main South Island railway line. In addition, the MidlandPort site was positioned alongside a large area of vacant industrial land that provided for the development of large freight and logistics providers immediately alongside the Port's boundary. This provided benefits to the Port and our key freight/logistics partners in terms of container handling efficiencies and reduced transportation times and costs. It also allows for reduced reliance on local roads as containers can be transported without needing access to the local road network.

The total length of railway siding that that can be accommodated on the current MidlandPort is 540m which allows us to load 30 railway wagons.

Capacity for Growth

We support Rolleston Industrial Developments Limited's (RIDL) submission to include the 27ha of land shown on the attached plan to be earmarked for future industrial development.

Our containerised cargo is forecast to increase from about 370,000 teu in 2015 to over 1 million teu by 2041. MidlandPort is part of our long term plan which makes sure we can meet this demand and to ensure we can handle bigger vessels and the increased volume that is expected over the next 20 – 30 years.

The site development, supporting infrastructure and activities were established subject by Resource Consent RC155101. It is these activities and the site that forms the basis for the Port Zone (PORTZ) and associated Noise Control Overlay within the recently proposed Selwyn District Plan. LPC is supporting the PORTZ through the current district plan Hearings process.

If the RIDL land is rezoned for industrial use, it does provide an opportunity for LPC to extend the railway line by a further 563 metres, allowing the possibility of longer more efficient trains. The Plan Change 66 site is the only site that provides such an opportunity. There would also be efficiencies in terms of enabling further areas of an extended rail siding for the contemporaneous development of large freight and logistics providers and optimisation of freight handling.

Reverse Sensitivity and Incompatible activities

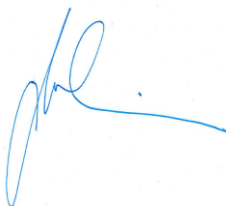
Under the current Selwyn District Plan zoning, the MidlandPort facility abuts Rural Zone on its eastern and northern boundary. The larger the extent of adjoining Rural Zone, the higher the potential for reverse sensitivity effects to arise from neighbouring rural property owners, for example in regard noise from the Port operations. The proposed Selwyn District Plan introduces a Noise Control Overlay to avoid such reverse sensitivity effects.

However, a rezoning of the Plan Change 66 site to Business 2A (General Industrial Zone) would provide a buffer to the rural zone to the north. It is considered that a rural environment would likely have amenity expectations and a quality of the environment that is less compatible at the interface with Midland Port operations.

Road Transport Issues

In response to concerns raised by LPC in its submission on PC66, further assessment and modelling of the road network, MidlandPort's interface with that network, and potential transport impacts arising from PC66, was undertaken by Rolleston Industrial Developments Ltd. In discussions with the Proponent of the Plan Change, it is understood that PC66 has been amended by the Proponent to enable an alternate egress from the Port to avoid congestion at the Jones Road access. This alternate access (via PC66) also will provide valuable resilience should any incidents occur on Jones Road (such as a crash or road maintenance) that would otherwise restrict access for the Port. LPC is very supportive of this aspect of the Plan Change.

Yours sincerely



MIKE SIMMERS

General Manager, Infrastructure and Property