Memorandum

DATE: 28 April 2026

TO: Mishka Banhidi, Planner

FROM: Mike Abramov, Senior Land Development Engineer

SUBJECT: MIC/2025/32 – Tulloch Limited Private Plan Change Request 805, 815 & 819 North Road, Invercargill - Engineering Assessment

Application

A private plan change is sought by Tulloch Limited to rezone approximately 9.7 hectares of land at 805, 815 and 819 North Road (SH6), Lorneville, Invercargill (the site) from Rural Zone to Industrial 1 (Light) Zone (IND1Z) under the Invercargill City District Plan.

The site currently contains a large, long-established wool store warehouse and associated industrial activity, with the balance of the land used for low-intensity pastoral purposes.

It is understood that the plan change is intended to enable light industrial development in general terms, rather than prescribe a specific subdivision outcome. Concept plans have indicated a development yield in the order of 12 – 15 lots; however, the applicant does not wish to commit to a minimum lot size of a maximum number of lots through the plan change process. The final number, size and configuration of lots will be determined through the subdivision consent process, informed by detailed engineering design and servicing constraints at that time.

Transport Assessment

Site Access/ Connectivity

The site fronts State Highway 6, a strategic regional route that carries approximately 12,200 vehicles per day with a posted speed limit of 80 km/h and connects Invercargill with key regional destinations. Future development of the site is estimated to generate in the order of 500 to 900 vehicle movements per day, depending on the scale and nature of activities established. Stantec have been engaged to complete an Integrated Transport Assessment (ITA) of the transport effects of rezoning the site. The ITA finds that this level of traffic can be accommodated safely and efficiently provided that access to the site is rationalised and upgraded in accordance with the proposed concept plans.

To address existing access safety concerns, particularly the presence of multiple uncontrolled crossings, the assessment recommends consolidation of access to a single, new, all-movement intersection on SH6. This intersection is proposed to be located approximately 115 metres north of the nearest opposing accesses, allowing for the provision of a right-turn bay on SH6 and reducing potential conflict with adjacent commercial driveways. This access arrangement has been developed

in consultation with Waka Kotahi NZ Transport Agency, and the application states that their safety concerns have been addressed through the proposed design.

It is however noted that in the correspondence with NZTA included in Appendix 14 of the application, NZTA are expecting the proposed plan change to be notified at which point they would review all of the documents lodged of the request and convey its position on the plan change proposed through a submission. It is also noted that the application proposes a rule that ensures the development complies with the North Road concept plan which includes a consolidated central main entry point to SH6, with restricted access movements to the southern access.

Based on the information that has been provided I am satisfied that appropriate access to the site can be achieved. However, it is recommended that NZTA is considered an affected party and allowed the opportunity to provide a submission on the proposed plan change and any recommended rules or requirements to be incorporated into the plan change.

Internal Roading
The application talks about a future road within the site that will be vested, however this will not be supported by Engineering Services and should remain in private ownership. There is no connection to Council's roading network.

Due to this it will be recommended that the ownership and maintenance responsibilities are resolved at the time of subdivision consent stage. To allow this it is recommended that the zoning framework is drafted indicating a preference for the internal roading to be privately owned however retaining flexibility to allow the roading assets to be vested in Council ownership if agreed by Council at the time of subdivision consent, without requiring a further plan change.

Services Assessment

Water Supply
While the Branxholme water supply trunk mains pass by the site these are not available for connection and there is not reticulated water supply available for connection in close vicinity to the site.

Due to this it is proposed that all water supply for the site will be via on-site collection methods until such time as a Council reticulated network is provided in the Lorneville area. Rainwater will be collected from roofs of buildings and held in storage tanks on each site. Static firefighting supply will be required for each lot – or a communal supply will be provided. Given the communal supply will not be connected to the Council's water supply network it is assumed all infrastructure associated with this will remain in private ownership.

This is considered a viable solution for the water supply at the site, noting that further details will need to confirmed at subdivision consent stage.

Stormwater
As part of the application, a stormwater management area located at the eastern end of the site with an area of approximately 5000 m2 and providing 1000 m3 of attenuation storage is proposed. It is proposed that all stormwater from the site will be directed to this area via internal reticulation. The stormwater will be detained in a shallow basin allowing sediments to settle before the stormwater is discharged to the adjoining stream (which discharge to the Waikiwi Stream) via a controlled outlet.

Based on the detail provided in the service report included as part of the plan change application, it is expected that a suitable solution to mitigate downstream implications can be implemented. However, it is noted that this will need to be worked through in more detail at the subdivision consent stage when there is more certainty regarding the proposed development.

Stormwater servicing is a key concern for the Council - given the site is located outside the Councils existing stormwater network and rating area, the Councils current preference is for the any required stormwater infrastructure to be privately owned and maintained. This may also create complications if the internal roading network is vested into Council ownership.

As with the roading requirements it is recommended that the ownership and maintenance responsibilities for stormwater infrastructure are resolved at the time of subdivision consent stage. To allow this it is recommended that the zoning framework is drafted indicating a preference for the stormwater infrastructure to be privately owned however retaining flexibility to allow the assets to be vested in Council ownership if agreed by Council at the time of subdivision consent, without requiring further plan change.

It is also noted that depending on the stormwater design and ownership structure either a variation to the Council's Stormwater discharge consent or a new independent discharge consent will likely need to be obtained from Environment Southland. Again, it is expected that this most appropriate time to obtain these consents is during the subdivision consent process once further detailed of the proposed development at the site are better understood.

Wastewater

There is currently no reticulated wastewater infrastructure in close vicinity to the site. Due to this a new low-pressure rising main extending from the site south on North Road connecting into the ICC wastewater network is proposed. It is proposed that all new activities establishing on the site will have their own onsite pumps that will connect to this main via an internal reticulation network.

There is limited detail provided in the application regarding the proposed ownership of the wastewater infrastructure i.e. the proposed new low-pressure rising main extending from the site south on North Road as well as the internal reticulation network. As with the other infrastructure associated with the development the Council's preferred position is that the wastewater infrastructure is privately owned.

Some concerns regarding the proposed wastewater solution for the development has been raised as follows:

- The site is located outside the Council's current wastewater rating boundary – if the site was going to be connected to the Council's system, provisions to allow the site to be rated for wastewater services (i.e., modifying the existing or creating a new wastewater rating boundary) would need to be allowed for.
- It is unclear if a privately owned wastewater main extending along the State Highway would be allowed by NZTA and approval for this may need to be sought.
- If the wastewater main along the State Highway was going to be owned by the Council the neighbouring properties may also have the right to connect to this main, and therefore this new main and the downstream network may need to have capacity to accommodate these.
- A connection to the Council's Moore Road pump station is not supported by Engineering Services due to capacity constraints in the pump station and rising main. While the existing downstream network (downstream of manhole F20008) may have sufficient capacity, modelling would need to be completed to confirm this.
- Please note that this would require a council decision as staff do not hold this delegation.

Based on the above, there appear to be several challenges associated with allowing a connection to the Council's wastewater network. However, if a connection is not considered acceptable, there is potential for on-site wastewater treatment, noting that this may constrain the number of allotments and the nature of development achievable on the site. On this basis, it is considered appropriate that wastewater servicing arrangements be confirmed at the subdivision consent stage.

Summary and Recommendations

Based on the information that has been provided it is believed that providing appropriate access and servicing if the site was zoned Industrial 1 (Light) Zone (IND1Z) under the Invercargill City District Plan is viable. It is however noted that a significant amount of detail regarding access and service provisions will need to be worked through in consultation with the Council as the subdivision consent stage.

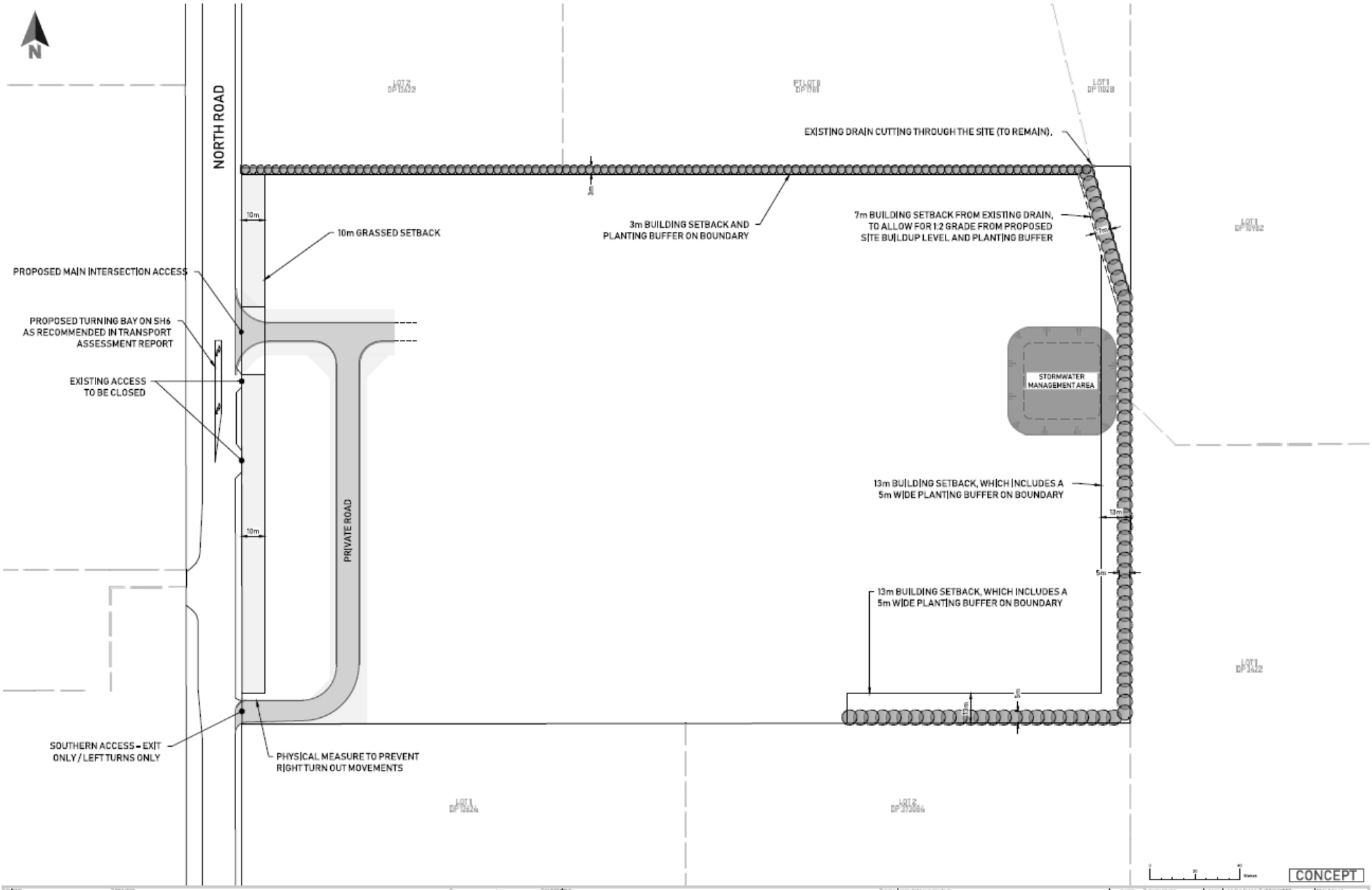
It is recommended that NZTA is considered an affected party and allowed the opportunity to provide a submission on the proposed plan change and any recommend rules or requirements to be incorporated into the plan change.

Additionally, it is recommended that the zoning framework for the site it drafted to:

- To include a rule that ensures the development complies with the North Road concept plan which includes a consolidated central main entry point to SH6, with restricted access movements for the proposed southern access.
- Indicates that the Council's preferred position is for the roading, stormwater, wastewater and water supply assets required for the development to be privately owned and maintained, however provides flexibility for the assets to be vested in Council ownership if agreed by Council at the time of subdivision consent, without requiring further plan change.



MIKE ABRAMOV
SENIOR LAND DEVELOPMENT ENGINEER
ENGINEERING SERVICES



CONCEPT

CLIENT: TULLOCH GROUP LIMITED	PROJECT: 805, 815 & 819 NORTH ROAD, INVERCARGILL	bonisch	SHEET TITLE: NORTH ROAD CONCEPT PLAN

REV	REVISION DETAILS	DATE			
A	CONCEPT PLAN - FOR DISCUSSION	17/04/2024	SURVEYED:	EMY	09/08/2023
B	LANDSCAPING UPDATES AND DISPLAY CHANGES	02/04/2025	DESIGNED:		
C	LANDSCAPING UPDATES AND DRAIN AT NORTHEAST CORNER	14/05/2025	DRAWN:	SHD	18/09/2025
D	REMOVE EXISTING BUILDING AND ANNOTATION UPDATES	28/05/2025	DESIGN CHECK:	JJR	18/09/2025
E	UPDATED INTERNAL ROAD LAYOUT	18/09/2025	APPROVED:		

JOB NUMBER: 7895
SHEET: 1 OF 3
SCALE @ A3: 1:750
REVISION: E
REVISION DATE: 18/09/2025

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