



8 October 2014

District Plan Submissions
Christchurch City Council
PO Box 73001
Christchurch 8154

Email: dpreview@ccc.govt.nz

Dear Sirs

NZMEA Submission on Proposed Christchurch District Plan Chapter 16 - Industrial

Introduction

The New Zealand Manufacturers and Exporters Association (NZMEA) represent the interests of manufacturers and exporters throughout New Zealand.

The Association is New Zealand's only focused and independent voice for manufacturers and exporters. Members make over \$6 billion in sales per year, with an export value of around \$3 billion. The Association can trace its beginning back to the early history of New Zealand.

The Association also includes in its membership affiliate organisations such as the Wood Processors and Manufacturers Association, the Engineering Printing & Manufacturing Union Inc, the Heavy Engineering Research Association (HERA), and Plastics New Zealand.

Our members have expressed concern, over a number of years in regard to reverse sensitivity and the absence of public notification around changes of use on sites close to or part of existing industrial zones.

The NZMEA does wish to be heard on this submission.

General Comments: Industrial Plan Changes - Chapter 16

The matter of reverse sensitivity keeps cropping up, usually we get to find out the changes only after consents have been issued – The Tannery, Tanner Street and Marshall Street are examples in the Woolston area.

Christchurch is fortunate to front a productive Canterbury where production needs a route to market which is well served by the port, and has value add processing that suits Woolston and Bromley. In fact these areas, probably unique in Australasia, should be considered as major opportunities to both add and create value.

These areas have the transport links, electricity supply, sewer infrastructure and embedded low cost housing that any heavy industrial area needs. Investment in activity that leverages these attributes should be encouraged not threatened by encroaching reverse sensitivity from inappropriate development.

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It is also worth mentioning that the more primary material waste streams processed, the less material ends up in landfill, taking some volume pressure off the waste stream that must be managed in the community.

The Tanner Street history tells us that the custodial (night watchman) amenities associated with warehouse developments, over time changed into full scale residential occupancy, resulting in more complaints around noise and odour for nearby long established industrial operations.

More recently the Tannery development has increased the complaint level for industrial operations struggling with the aftermath of the earthquakes and weather damage. The change in use for the Tannery was not notified and industrial operators had no opportunity to comment on the development.

The Association raised the Tannery matter with the CCC and ECAN, but consents had already been issued and now all the matters of reverse sensitivity fall on the industrial operators. As a result of these interactions, we were assured in early 2013 that we would be notified, even if unofficially, on any future development that could trigger further reverse sensitivity issues. That did not happen - as an additional development has been consented, again without any form of notification, at the old New Zealand Foam site on Marshall Street – supposedly custodial warehousing (promoted with three bedrooms), potentially increasing sensitivity in the area.

There is a need to recognise that while odour, dust and noise can for the most part be contained and controlled, if they are an inherent part of an industrial process, on occasion the nuisance will cross the boundary. This was not recognised in the Tannery consent and the creeping use change in Tanner Street is likely to be emulated in Marshall Street.

History like this does not encourage more investment in Christchurch.

Specific Comments

Woolston and South West Hornby

We support the detailed submission from Gelita and Heinz Wattie and encourage the CCC to have more regard for reverse sensitivity around the city. Protect existing use with:

- An explicit recognition that standards of acceptable odour, dust and noise vary dependent on the surrounding zone.
- An explicit recognition that odour, dust and noise inherent in any process, may, on occasion not be confined to the boundary.
- Buffer zones between heavy industrial and general industrial areas taking into account existing operations – rezoning existing B5 zones as general industrial has the potential to further threaten heavy industrial (existing B5) zones. The area around the New Zealand Foam site could well be seen as general industrial at the Radley Street end, but incursion into the heavy industrial zone (existing B5) by re-designation as a general industrial zone is a concern for industrial operators towards the east.
- Similarly changes in zone from rural to heavy industrial might involve reverse sensitivity matters.
- Adequate notification of any proposed change in use that might have reverse sensitivity implications.

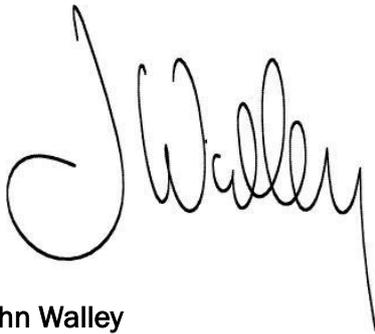
Technology Park Zone (Tait Campus)

The ancillary office limitation does not take into account the form of some high tech operations; it is possible that such an operation might manufacture elsewhere in New Zealand or even off-shore while the engineering, design and perhaps testing is done on site. Physical material may well be shipped direct to customers from the point of production. So no warehouse or factory operation would be needed locally. By way of example, product manufactured in Singapore might be engineered and programmed from a building on the Tait campus, so that high tech operation, without close inspection, would look little different than a legal or accounting practice. This raises the question - ancillary to what - in the high tech context?

Summary

Ultimately the community must decide if industry is to develop, bring jobs and economic activity to the city. Reverse sensitivity remains a creeping threat to existing and future investment - the new city plan is an opportunity to address this problem.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Walley'. The signature is fluid and cursive, with a large initial 'J' and a long, thin tail extending downwards from the end.

John Walley
Chief Executive