

20 May 2015

Comments on Land Use Recovery Plan Review
Environment Canterbury
PO Box 345
Christchurch 8140

Email: lurp@ecan.govt.nz

Dear Sirs

Land Use Recovery Plan Review

The New Zealand Manufacturers and Exporters Association (NZMEA) appreciates the opportunity to comment on the LURP Review.

If possible the NZMEA wishes to be heard on this submission.

Background

The New Zealand Manufacturers and Exporters Association (NZMEA) consulted with our members and members of our LURP Group.

The NZMEA LURP Group was established in 2013 to discuss concerns around land use and recovery in the eastern suburbs, they represented 35 companies, providing 900 jobs. This group represented small to medium business interests as well as larger employers located in the Woolston, Bromley and Ferrymead areas.

The key issues that emerge from our consultation are the continuing variations in the planning process leading to uncertainty and creeping reverse sensitivity.

Comments

Direction and Coordination

Outcome 4

RMA Plans and regulatory processes enable rebuilding and development to go ahead without unnecessary impediments.

The NZMEA supports in principal that the consenting of activity is issued in a timely manner.

With regards to the ongoing District Plan Review, and the potential rezoning of the Woolston area, the NZMEA are resolute in our concerns that the issuing of consents will still rely on existing consents and opinion rather than established use patterns. An area that is zoned industrial should be protected for industrial use.

We reiterate our earlier concerns around the non notified consent issued to The Tannery to be established in a heavy industrial zone. Many requirements in the plan were waived in the consent application and the reverse sensitivity issue, though considered, never involved the companies that would be most concerned - this consultation is needed to ensure that reverse sensitivity issues are fully considered by all concerned parties at the time of consent. Refer CCC Resource Consent RMA92018519.

Outcome 5

A supportive and certain regulatory environment provides investor confidence to obtain the best outcomes from resources used in the recovery.

Industry continues to need practical support for their investment decision process. We don't think industrial activities have been well served by existing processes. A commitment to an existing use precedence in our industrial zones would be helpful in encouraging investment decisions that support long term industrial activity in Christchurch.

Unless the community can demonstrate a commitment to retaining industry the on-going presence of that industry in Woolston, and in most cases Christchurch and New Zealand is increasingly uncertain.

The biggest concern for those in the Woolston area remains reverse sensitivity. Noise, smell and dust are an inherent part of industrial processes and can vary over time due to circumstances. Industry needs a place to operate now and in the future, and any sign that operations might be threatened in the future directly impacts investment decisions now.

Outcome 7

Opportunities are available for the market to deliver comprehensive redevelopment in suitable existing neighbourhoods.

If the reverse sensitivity issue is not properly dealt with on the basis of "you know what it is like when you go there" or if the district plan says "no mixed use", this needs to be adhered to, otherwise industrial activity will be driven from the region. Having nowhere else to go in Christchurch with the required infrastructure such as trade waste, electrical capacity, and a local community with long experience of co-existence, industry will close or quit New Zealand.

The issues around consent and reverse sensitivity are also evident in the new development of residential/warehouse/retail units in Marshall Street, Woolston and its impact on surrounding manufacturers on what was previously industrial land (ex-Skellerup site).

We believe there is a case to see the industrial areas of Woolston, Bromley and Ferrymead treated in a similar way as the airport prohibition of noise sensitive development that allows up to the 50dBA noise contour, this protects the existing 24 hour operation of the airport.

Our suggestion is not to provide for exclusion of activity, as the noise contour does for the airport, but to give existing use precedence to areas that now have unique infrastructure and industrial activity. This would not preclude other development in such a zone but it would require any new development to tolerate any established pre-existing use.

Outcome 9

Businesses in damaged areas are able to rebuild cost-effectively and to improve their use of land, buildings, plant and machinery.

The Christchurch City Council's proposed increase in the level of rates is excessive and lacks any connection to the realities faced by manufacturers and exporters. Increases in residential rates of 8.75%, 8.5%, 8.5% and 7.5% represents an increase of 37.6% over the four years and falls well above domestic and international projected inflation rates. We also note that business rates will increase at a higher percentage than those stated above and this is a concern.

For many businesses considering rebuilding or expanding the prospect of excessive rates increases will see them look to either other Canterbury districts (i.e. Selwyn), or outside of Canterbury.

Council and community aspirations are an additional cost to manufacturers and exporters. It is cold comfort that rates might be higher elsewhere in New Zealand - if operating here is too expensive the activity will leave Christchurch and perhaps New Zealand for good. Without manufacturing the resilience of our local economy will be significantly reduced as will overall employment numbers.

Outcome 11

Sufficient industrial business land is available to accommodate relocations and industrial sector growth.

The industries located in the Woolston, Bromley and Ferrymead cannot be relocated to other areas of Christchurch as it is not possible to replicate the existing infrastructure, such as electricity, trade waste water currently servicing heavy industry in the eastern suburbs.

In many cases the work force catchment limitations also restrict relocations as there may be limited transport options for their staff.

For the primary processing industries, for example, gelatine manufacturing, fish processing, and a tannery; they can only be conducted in the Woolston area on the basis that there has been community acceptance and there is adequate provision for trade waste and electricity. These activities cannot take place anywhere else in the city with the existing infrastructure. Local property prices reflect the long established use patterns and the fact that those industries are improving over time. However, noise, and smell will be issues from time to time – industry needs a place to operate.

Conclusion

Industry has a vital role to play, both now and in the future of Christchurch to provide much needed jobs and economic growth. Industry has its own series of issues and problems which are often different to those in other businesses; to achieve the best results for the future of Christchurch the Land Use Recovery Plan should reflect and understand these differences.

We appreciate the opportunity to provide feedback to this review.

Yours sincerely



Dieter Adam
Chief Executive