

DDPR_feedback_0383s		
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	Response Date	Aug 30 22 11:16:33 am
	Notes	Kevin Bligh
Q1	Select the chapter you want to provide feedback on	
	General Industrial Zone	
Q2	In general, to what extent do you support the contents of this chapter?	
	Oppose	
Q3	Objective/Policy/Rule/Standard reference:	
	Please refer attached document	
Q4	Feedback/Comments	
Q5	Objective/Policy/Rule/Standard reference:	
Q6	Feedback/Comments	
Q7	Objective/Policy/Rule/Standard reference:	
Q8	Feedback/Comments	
Q9	Objective/Policy/Rule/Standard reference:	
Q10	Feedback/Comments	
Q11	supporting documents?	
	0	
Q12	If you need more space, or have any other general comments, please leave them here	

Draft Waitaki District Plan provision	Road Metals submission	Suggested amendments to Draft Waitaki District Plan				
<p>Part 1 - Introduction and General Provisions</p> <p>Definitions</p> <table border="1" data-bbox="190 432 779 1050"> <thead> <tr> <th data-bbox="190 432 383 464">Term</th> <th data-bbox="383 432 779 464">Definition</th> </tr> </thead> <tbody> <tr> <td data-bbox="190 464 383 1050"><i>Potentially high-impact industrial activities</i></td> <td data-bbox="383 464 779 1050"> <i>means Industrial activities that because of their nature or scale has a greater potential to impact on the receiving environment than other industrial activities and are those listed below:</i> <ol style="list-style-type: none"> 1. <i>manufacture and processing of chemical fertilisers;</i> 2. <i>meat processing, or any associated processing of meat and meat by-products, or co-products;</i> 3. <i>fish curing, cleaning, treatment, preserving and storage;</i> 4. <i>cement and bulk concrete products manufacture, including cement plants and concrete batching plants (but excluding the pour of wet-mixed concrete as part of construction);</i> 5. ... </td> </tr> </tbody> </table> <p>Part 3 Area Specific Matters</p> <p>General Industrial Zone</p> <p>GIZ-R1</p>	Term	Definition	<i>Potentially high-impact industrial activities</i>	<i>means Industrial activities that because of their nature or scale has a greater potential to impact on the receiving environment than other industrial activities and are those listed below:</i> <ol style="list-style-type: none"> 1. <i>manufacture and processing of chemical fertilisers;</i> 2. <i>meat processing, or any associated processing of meat and meat by-products, or co-products;</i> 3. <i>fish curing, cleaning, treatment, preserving and storage;</i> 4. <i>cement and bulk concrete products manufacture, including cement plants and concrete batching plants (but excluding the pour of wet-mixed concrete as part of construction);</i> 5. ... 	<p>Road Metals owns a concrete batching plant at Caledonian Road. Kiwi Concrete operates a concrete batching plant at Regina Lane.</p> <p>Road Metals and Kiwi Concrete are moving their concrete batching operations to 134 Pukeuri-Oamaru Road (SH1).</p> <p>Road Metals and Kiwi Concrete are opposed to the inclusion of concrete product manufacturing and concrete batching plants within the definition of “potentially high-impact industrial activities”.</p> <p>The submitters do not consider that the nature of concrete manufacturing has a greater potential to impact on the receiving environment than other industrial activities. In addition, in some instances the scale of concrete manufacturing can be such that there is no greater potential to impact the receiving environment than other general industrial activities.</p> <p>This is especially in the context of their proposed new concrete batching plant at 134 Pukeuri-Oamaru Road (SH1). It is considered that any effects of this activity can be appropriately addressed through the built, landscaping, hours of operation and outdoor storage standards of the General Industrial Zone (GIZ), as well as transport, noise and hazardous substances provisions of the plan. The proposed activity will be further regulated through the regional plan provisions addressing discharges to air, stormwater discharges etc.</p> <p>Road Metals is suggesting an amendment to the</p>	<p>Amend the definition of “Potentially high-impact industrial activities” as follows (amendments shown in bold and strikethrough or <u>underline</u>):</p> <p><i>“means Industrial activities that because of their nature or scale has a greater potential to impact on the receiving environment than other industrial activities and are those listed below:</i></p> <ol style="list-style-type: none"> 1. <i>manufacture and processing of chemical fertilisers;</i> 2. <i>meat processing, or any associated processing of meat and meat by-products, or co-products;</i> 3. <i>fish curing, cleaning, treatment, preserving and storage;</i> 4. <i>cement and bulk concrete products manufacture, including cement plants and concrete batching plants (but excluding the pour of wet-mixed concrete as part of construction);</i> 5. ... <p>Alternatively, Road Metals seeks an exemption to the definition of “Potentially high-impact industrial activities” for concrete batching activities proposed on their site at 134 Pukeuri-Oamaru Road (SH1). This could be achieved through specific wording to this definition as follows:</p> <p><i>“means Industrial activities that because of their nature or scale has a greater potential to impact on the receiving environment than other industrial activities and are those listed below:</i></p> <ol style="list-style-type: none"> 1. <i>manufacture and processing of chemical fertilisers;</i>
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<i>Potentially high-impact industrial activities</i>	<i>means Industrial activities that because of their nature or scale has a greater potential to impact on the receiving environment than other industrial activities and are those listed below:</i> <ol style="list-style-type: none"> 1. <i>manufacture and processing of chemical fertilisers;</i> 2. <i>meat processing, or any associated processing of meat and meat by-products, or co-products;</i> 3. <i>fish curing, cleaning, treatment, preserving and storage;</i> 4. <i>cement and bulk concrete products manufacture, including cement plants and concrete batching plants (but excluding the pour of wet-mixed concrete as part of construction);</i> 5. ... 					

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	<p>definition of “potentially high-impact industrial activities” so that concrete batching plants are permitted within the GIZ. This amendment is considered appropriate as the concrete batching plant is consistent with the proposed draft objectives GIZ-O1 – O4 and policies GIZ-P1 – P6.</p> <p>Concrete batching is not considered to be a Heavy Industrial type of activity. The National Planning Standards (2019) description of Heavy Industrial Zone includes “Areas used predominantly for industrial activities that generate potentially significant adverse effects. The zone may also be used for associated activities that are compatible with the potentially significant adverse effects generated from industrial activities”. The adverse effects of concrete batching are not considered to be significant, in comparison to activities that emit or have the potential to emit odours, gases or other substances to air which would be so offensive as to impact on the amenity values of neighbouring sites or which could constitute a health risk for people in the vicinity.</p> <p>Concrete batching activities are not considered to result in such effects and recent plan reviews including the proposed Selwyn District Plan and the Draft Timaru District Plan provide for concrete batching as a permitted activity in their GIZ zone. The effects of the air discharge in that instance would be appropriately managed by the relevant regional plan.</p> <p>Essentially, this definition provides for activities that should be located within the Heavy Industrial Zone, however Road Metals considers that</p>	<p>2. meat processing, or any associated processing of meat and meat by-products, or co-products;</p> <p>3. fish curing, cleaning, treatment, preserving and storage;</p> <p>4. cement and bulk concrete products manufacture, including cement plants and concrete batching plants-(but excluding <u>concrete batching plant at 134 Pukeuri-Oamaru Road (SH1)</u> and the pour of wet-mixed concrete as part of construction);</p> <p>Alternatively, through an exemption in the wording of GIZ-R1 of the GIZ chapter as follows:</p> <p><u>PER-1 Any Industrial activity does not involve potentially high-impact industrial activities (with the exception of any concrete batching activities at 134 Pukeuri-Oamaru Road (SH1)).</u></p>

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	<p>concrete batching should be provided for within a GIZ for the reasons outlined above.</p> <p>Alternatively, there could be consideration given to the nature of the receiving environment and scale of the proposed activity for this proposed site and a scheduled activity provided for on this site. In particular, the relocation of the batching plant to the proposed new site is considered to be a better environmental outcome given the site is located within the rural receiving environment (rather than a neighbouring residential environment) and with better access. The objectives of the GIZ focus on protecting amenity values of Residential, Open Space, and Sport and Active Recreation zones. The proposed concrete batching plant is surrounded by the General Rural Zone. In addition, the effects of the concrete batching will be unlikely to affect the amenity of neighbouring industrial properties in the zone, with minimal nuisance effects some of which are anticipated in this type of zone. Therefore, amenity values on these areas will not be affected and the proposed concrete batching activity at this site should be considered to be a permitted activity in the GIZ.</p>	