

DDPR_feedback_0007s	
Name	Karl Rendel
Organisation	Systems Administrator CANTERBURY SPINNERS LTD
Email	karl.rendel@godfreyhirst.co.nz
Response Date	Jul 7 22
Notes	
Q 1	Select the chapter you want to provide feedback on
	General Industrial Zone
Q 2	In general, to what extent do you support the contents of this chapter?
Q 3	Objective/Policy/Rule/Standard reference:
	GIZ-S8
Q 4	Feedback/Comments
	<p>Currently we are operating Monday to Friday 24 hours a day in a 3 x 8 hour structure with overtime being worked up until 4 in the afternoons on a Saturday if required.</p> <p>If we need to quickly increase capacity the best way is to move to a Monday to Sunday, 24 hour, 12 x 2 shift structure. I would note this was also the shift structure in place on this site from the mid eighties to 28*h February 2012.</p> <p>The draft plan however</p> <ol style="list-style-type: none"> Does not cover or protect our current operational hours. Would mean changing shift structures would be difficult, could take an extended period of time to implement if we had to go to a notifiable consent, with no guarantee of success. <p>The new plan needs to protect our ability to operate as current and for future expansion as required. Considerations for expansion at the Oamaru site in the near future could be affected if we could not rely on the ability to increase the sites capacity.</p>
Q 5	Objective/Policy/Rule/Standard reference:
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	<p>We have roughly 5.6 hectares of land on the west side of the railway tracks, 1 hectare on the east side of the tracks. Is the land coverage taking into account both land areas or are they separate?</p> <p>If we lose 25% of the land on the west side of the tracks that equates to 1.4 hectares of land that we can't use.</p>
Q 7	Objective/Policy/Rule/Standard reference:
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Q 8	Feedback/Comments
	<p>We have the chimney which measures 36.6 metres and has been in place since 1988, coal transfer elevator which has been in place since 1973 system and a water tank which has been there since the 1950's I believe so we cannot comply with this section.</p>
Q 9	Objective/Policy/Rule/Standard reference:

Q 1 0	Feedback/Comments
Q 1 1	supporting documents?
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Q 1 2	If you need more space, or have any other general comments, please leave them here
	<p>As a large manufacturing operation that is part of a large national and international company, we understand difficulties that the council faces in having to meet regulatory requirements, keep rate payers, constituents and business operators happy.</p> <p>We struggle to understand however why the proposed draft plan reverts to rules and controls that were proposed in the 1990's and were so contentious at that time.</p> <p>We as a company would like to work with the council on the issues identified in this letter and those yet to be identified to make the current draft plan a more workable document that meets both regulatory and business requirements going forward.</p> <p>We look forward to working with council to achieve rules and controls that are relevant to all parties and don't place unforeseen risk or cost to our operation.</p>

7th July 2022

Planning Department
 Waitaki District Council
 Private Bag 50058
 Oamaru 9444

Subject: Submission on the Draft District Plan

Dear Sir/Madam

As per our discussion with Katrina and Rachael on the 28th June 2022 we would like to highlight the follow issues we have with the draft plan and the impact that these issues may have on our business.

We would also highlight that some of the same issues we are raising here, are replications of issues raised in the consultation of the first District Plan in the nineties. We find it hard to understand after years of operation under the operative plan why we need to down the same path again.

Godfrey Hirst NZ Ltd is looking to invest close to 5 million dollars in the next 12 to 18 months on the Oamaru site, and we are concerned that once reported to Group and Corporate Management these issues may cause a change to that investment plan.

Issue 1	Hours of Operation		
	<p>Under the operative plan in Part III: Zone Rules: Section 7.7.2.1 Scheduled Activities – Summit Wool Spinners Ltd – 7.7.2.2 Special Conditions ii. Rule 7.4.10(4) (Hours of Operation) shall not apply to activities carried out on the scheduled sites.</p>		
	<p>In the draft plan GIZ – General Industrial Zone GIZ-S8 Hours of Operation</p> <table border="1" data-bbox="240 1075 1535 1512"> <tr> <td data-bbox="240 1075 813 1512"> <p>Any activity (other than a residential activity) on a site adjoining an Open Space and Recreation Zone or a Residential Zone, must not operate outside the following hours:</p> <ul style="list-style-type: none"> • 7:00am–10:00pm Monday to Saturday; and • 9:00am–5:00pm Sunday and public holidays; <p>except where:</p> <ol style="list-style-type: none"> 1. the entire activity is located within a building, and 2. there are no visitors, customers, or deliveries to the activity outside the above </td> <td data-bbox="818 1075 1535 1512"> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the location and operation of the activity, including the effects of noise, lighting and effects from the generation of traffic; and 2. any adverse effects on the amenity values of properties in an adjoining Residential or Open Space and Recreation Zone. </td> </tr> </table>	<p>Any activity (other than a residential activity) on a site adjoining an Open Space and Recreation Zone or a Residential Zone, must not operate outside the following hours:</p> <ul style="list-style-type: none"> • 7:00am–10:00pm Monday to Saturday; and • 9:00am–5:00pm Sunday and public holidays; <p>except where:</p> <ol style="list-style-type: none"> 1. the entire activity is located within a building, and 2. there are no visitors, customers, or deliveries to the activity outside the above 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the location and operation of the activity, including the effects of noise, lighting and effects from the generation of traffic; and 2. any adverse effects on the amenity values of properties in an adjoining Residential or Open Space and Recreation Zone.
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Issue 2	Noise																						
	<p>Under the operative plan 7.5.1 Noise On any site, activities shall be conducted such that the following noise limits are not exceeded at any point within the boundary of another site within that zone or in any other zone during the following time frames:</p> <table border="0" data-bbox="231 358 1356 448"> <tr> <td></td> <td style="text-align: center;">Daytime</td> <td style="text-align: center;">Night time</td> </tr> <tr> <td>Business 3:</td> <td style="text-align: center;">60dBA LAeq (15 min)</td> <td style="text-align: center;">60dBA LAeq (15 min)</td> </tr> </table> <p>Daytime: 0700 - 2200 Monday to Friday and 0700 – 1900 Saturday Night time: At all other times</p>		Daytime	Night time	Business 3:	60dBA LAeq (15 min)	60dBA LAeq (15 min)																
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Issue 3 **SCHED2 – Historic Heritage Items**

HH81			
Name (Original)	Ōamaru Woollen Factory (Former)	Extent of setting and any exclusions from protection:	Statement of Significance:
Location	4 Spey Street, Ōamaru	The setting includes Pt Sec 1 and 3 Blk I Ōamaru SD and Pt Lot 21 DP 60 and legal road.	The Ōamaru Woollen Factory Company opened on this site in 1918 and with its successor companies spans ninety years as a manufacturer of wool products, and as one of the largest employers in Ōamaru. The factory buildings reflect the changes in this important industry over the last century.
District Plan Category	B		The Ōamaru Woollen Factory represents the development over time of an extensive complex of industrial buildings built in the local vernacular material
HNZ Register #	3225		
Map	58		
Legal Description	Pt Sec 1 Blk I Ōamaru SD (OT374/198), Pt Sec 3 Blk I Ōamaru SD (OT184/228), Pt Lot 21 DP 60 (OT355/27) and legal road	The listing excludes all the interiors and the wool store constructed in 2005.	

Whilst we acknowledge that there has been a Textile Factory on the current location since the 1920's, Council has to acknowledge that we are full scale manufacturing operation in buildings that have been altered from the original factories design and scope.

The buildings have all had roof and floor replacement, earthquake strengthening, lowered ceilings to try and adjust them to current day requirements.

In previous discussions with council staff and Heritage New Zealand staff they acknowledge that there is nothing overly special about the buildings, but the fact there has been a textile factory on the site for 100 years and the impact it has on the district needs to be allowed for.

We would like to say that we would like to be around for another 100 years on this site, restricting or making the ability to change or adapt the current buildings going forward would hinder such development. From knowledge of the difficulty that arose the last time this site was put up for sale, if Godfrey Hirst NZ Ltd vacates this site, it will not continue as textile factory. It would more than likely face being demolished as no manufacturing operation would take it on in its current form

We would ask that the site be removed from the register and also then seek help from the council to remove it from the Heritage NZ register or identified in the plan that the listing does not cover any onsite buildings.

The company would cooperate with Heritage NZ personnel in retaining any items that they may wish kept, we note in 2012 all significant documents and photos were passed onto the Nort Otago museum, and staff from council have visited since to look other documentation for retention.

Issue 4 **Energy**

In the introduction section of Part A: General Energy (ENG) it states *Energy efficiency and the use and development of renewable energy are matters the District Plan must have particular regard to under section 7 of the Act. The District Plan must also give effect to the National Policy Statement on Renewable Electricity Generation 2011 which requires recognition of the benefits of renewable electricity generation.*

Section ENG-P5

Only allow small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities within any overlay, where:

1. if located on buildings, items and sites identified in SCHED2 – Historic Heritage Items and SCHED5 – Sites and Areas of Significance to Māori:
 - a. its location is sympathetic to the identified values; and
 - b. any structure is not visible from any adjacent public areas and is aligned with the plane of the roof where located on a roof;

Restricted Discretionary Activities ENG-R5 All Zones

Activity status: Restricted Discretionary	Activity status when compliance is not achieved: Non-Complying
Where: RDIS-1 The activity is located: 1. on items identified in SCHED2 – Historic Heritage Items, on contributing buildings	Where: NC-1 Compliance is not achieved with RDIS-2 or RDIS-4

	<p>identified in SCHED3 – Character Contributing Buildings and Non-Contributing Buildings, or sites identified in SCHED5 - Sites and Areas of Significance to Māori; or</p>	
<p>ENG-S1 - Small scale solar</p>		
	<ol style="list-style-type: none"> 1. The panel must not exceed the permitted building height for the underlying zone; and 2. The panel must not exceed the permitted height in relation to boundary for the underlying zone; and 3. the maximum area of the panel must not exceed 200m2. 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. any positive effects; and 2. any offset or compensation measures offered; and 3. the form and location of the panel; and 4. any adverse effects on the amenity of adjacent properties.
<p>Godfrey Hirst has set sustainability targets worldwide for every division within the company, these include a 42% in Carbon emissions by the year 2030. Godfrey Hirst New Zealand has committed to the installation of solar panels on New Zealand sites. The Auckland site is due to commissioned next month, installation of panels in Dannevirke will commence in August or September and Lower Hutt and Oamaru sites will be assessed once this has been completed.</p> <p>We see the impact of Issue 3 coming to the fore here. Would a consent need to be approved by Heritage New Zealand for a roof that is comprised of modern materials?</p> <p>If solar panels are ground installed, are they to be considered a structure?</p> <p>To highlight a possible issue based on the proposed plan</p> <ul style="list-style-type: none"> • The sizing of a small scale solar panels installation suits your average house, but really in the industrial zone 200m2 is only an installation of 10 x 20 metres for the whole site. • Would Solar panels require consent due to the angle of the installation on any roofing area. • Would installing such panels on the ground in the area noted as paddock fall within these restrictions. <p>We ask that consideration be given within the plan to identify this type of installation differently than general structural work.</p>		
<p>Issue 5</p>	<p>GIZ-S1 Building Height and Structures.</p>	
	<p>1. Any buildings and structures must not exceed a maximum height of 12m measured from ground level; and Clause 1 does not apply to: antennas, aerials, satellite dishes (less than 1m in diameter), chimneys and flues, provided these do not exceed the height limit by more than 3m, measured vertically.</p>	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the location, design and appearance of the building; and 2. any adverse effects on the streetscape; and 3. any adverse effects on the amenity values of neighbours on sites containing residential or other sensitive activities, including shading and effects on privacy; and 4. compatibility with the scale, proportion and context of buildings and activities in the surrounding area.
<p>We have the chimney which measures 36.6 metres and has been in place since 1988, coal transfer elevator which has been in place since 1973 system and a water tank which has been there since the 1950's I believe so we cannot comply with this section.</p>		

Issue 6	GIZ-S2 Building Coverage	
	<p>1. The combined total areas of all buildings on the site must not exceed 75%; and</p> <p>2. Rainwater tanks less than 5,000 litres are exempt from any building coverage calculation made under Clause 1.</p>	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the location, design and appearance of the building; and 2. any adverse effects on the streetscape; and 3. any adverse effects on the amenity values of neighbours on adjoining sites; and 4. provision of outdoor space for storage, parking and other activities.
	<p>We have roughly 5.6 hectares of land on the west side of the railway tracks, 1 hectare on the east side of the tracks. Is the land coverage taking into account both land areas or are they separate.</p> <p>If we lose 25% of the land on the west side of the tracks that equates to 1.4 hectares of land that we can't use.</p>	
Issue 7	GIZ-S3 Building Setback from the road boundary	
	<p>Any building must be setback a minimum of 10m from the road boundary.</p>	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the location, design and appearance of the building; and 2. any adverse effects on the streetscape; and 3. any adverse effects on the amenity values of neighbouring properties.
	<p>As discussed with the council, this requirement is again denying us the use of the site. In areas with a residential boundary noise considerations etc would need to be incorporated into the design of the build and the consent process.</p> <p>In the current business 3 zone, if this rule was applied most of the site development that has taken place over the period of the current plan would not have.</p> <p>This rule serves no purpose.</p>	
Issue 8	GIZ-S6 Landscaping along a road boundary	
	<p>A landscaped area of at least a 10m width must be provided for and maintained along the road boundary and must include a minimum of one tree for every 10m of frontage. Trees must not be planted at a distance of more than 25m apart or closer than 5m. At the time of planting, all trees must have a minimum height of 1.5m or be at least 3 years of age.</p>	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the location, design and appearance of the landscaping; and 2. any adverse effects on the streetscape; and 3. any adverse effects on the amenity values of surrounding properties.
	<p>Can you please clarify, we have a set back from a road boundary of 10 metres, is this also saying we need an additional 10 metres of landscaping.</p> <p>Section 7.4.9 Landscaping in the current plan has a 1 metre requirement for Business 3, there is also no requirement to plant trees in Business 3. So are the rules for the General Industrial Zone changing to something that doesn't seem to have been applied for the whole of operative term of the current plan. At our site we are talking 243 m2 of landscaping, the cost to plant and then maintain this ongoing would be massive.</p> <p>We would also like to highlight that if that many trees are going to be planted in the general industrial zone then the drainage and road sweeping cost to council will also increase.</p>	

Summary

As a large manufacturing operation that is part of a large national and international company, we understand difficulties that the council faces in having to meet regulatory requirements, keep rate payers, constituents and business operators happy.

We struggle to understand however why the proposed draft plan reverts to rules and controls that were proposed in the 1990's and were so contentious at that time.

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We look forward to working with council to achieve rules and controls that are relevant to all parties and don't place unforeseen risk or cost to our operation.

yours faithfully



Bruce Blair
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Canterbury Spinners Ltd
Oamaru

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Eugene Conradie
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Oamaru

Phone 027 403 2600



Karl Rendel
IT/Systems Manager
Canterbury Spinners Ltd
Oamaru

Phone 027 224 9408

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Q11	supporting documents?
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Q12	If you need more space, or have any other general comments, please leave them here

DDPR_feedback_0010s		
	Name	Karl Rendel
	Organisation	Systems Administrator CANTERBURY SPINNERS LTD
	Email	karl.rendel@godfreyhirst.co.nz
	Response Date	Jul 7 22
	Notes	
Q1	Select the chapter you want to provide feedback on	
	Historic Heritage	
Q2	In general, to what extent do you support the contents of this chapter?	
Q3	Objective/Policy/Rule/Standard reference:	
	HH81	
Q4	Feedback/Comments	
	<p>Whilst we acknowledge that there has been a Textile Factory on the current location since the 1920's, Council has to acknowledge that we are full scale manufacturing operation in buildings that have been altered from the original factories design and scope.</p> <p>The buildings have all had roof and floor replacement, earthquake strengthening, lowered ceilings to try and adjust them to current day requirements.</p> <p>In previous discussions with council staff and Heritage New Zealand staff they acknowledge that there is nothing overly special about the buildings, but the fact there has been a textile factory on the site for 100 years and the impact it has on the district needs to be allowed for.</p> <p>We would like to say that we would like to be around for another 100 years on this site, restricting or making the ability to change or adapt the current buildings going forward would hinder such development. From knowledge of the difficulty that arose the last time this site was put up for sale, if Godfrey Hirst NZ Ltd vacates this site, it will not continue as textile factory. It would more than likely face being demolished as no manufacturing operation would take it on in its current form</p> <p>We would ask that the site be removed from the register and also then seek help from the council to remove it from the Heritage NZ register or identified in the plan that the listing does not cover any onsite buildings.</p> <p>The company would cooperate with Heritage NZ personnel in retaining any items that they may wish kept, we note in 2012 all significant documents and photos were passed onto the Nort Otago museum, and staff from council have visited since to look other documentation for retention.</p>	
Q5	Objective/Policy/Rule/Standard reference:	
	HH81	
Q6	Feedback/Comments	
	<p>Whilst we acknowledge that there has been a Textile Factory on the current location since the 1920's, Council has to acknowledge that we are full scale manufacturing operation in buildings that have been altered from the original factories design and scope.</p> <p>The buildings have all had roof and floor replacement, earthquake strengthening, lowered ceilings to try and adjust them to current day requirements.</p> <p>In previous discussions with council staff and Heritage New Zealand staff they acknowledge that there is nothing overly special about the buildings, but the fact there has been a textile factory on the site for 100 years and the impact it has on the district needs to be allowed for.</p> <p>We would like to say that we would like to be around for another 100 years on this site, restricting or making the ability to change or adapt the current buildings going forward would hinder such development. From knowledge of the difficulty that arose the last time this site was put up for sale, if Godfrey Hirst NZ Ltd vacates this site, it will not continue as textile factory. It would more than likely face being demolished as no manufacturing operation would take it on in its current form</p>	

	<p>We would ask that the site be removed from the register and also then seek help from the council to remove it from the Heritage NZ register or identified in the plan that the listing does not cover any onsite buildings.</p> <p>The company would cooperate with Heritage NZ personnel in retaining any items that they may wish kept, we note in 2012 all significant documents and photos were passed onto the Nort Otago museum, and staff from council have visited since to look other documentation for retention.</p>
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

DDPR_feedback_0011s		
	Name	Karl Rendel
	Organisation	Systems Administrator CANTERBURY SPINNERS LTD
	Email	karl.rendel@godfreyhirst.co.nz
	Response Date	Jul 7 22
	Notes	
Q1	Select the chapter you want to provide feedback on	
	Energy	
Q2	In general, to what extent do you support the contents of this chapter?	
Q3	Objective/Policy/Rule/Standard reference:	
	ENG-S1 - Small scale solar	
Q4	Feedback/Comments	
	<p>Godfrey Hirst has set sustainability targets worldwide for every division within the company, these include a 42% in Carbon emissions by the year 2030. Godfrey Hirst New Zealand has committed to the installation of solar panels on New Zealand sites. The Auckland site is due to commissioned next month, installation of panels in Dannevirke will commence in August or September and Lower Hutt and Oamaru sites will be assessed once this has been completed.</p> <p>We see the impact of Issue 3 coming to the fore here. Would a consent need to be approved by Heritage New Zealand for a roof that is comprised of modern materials?</p> <p>If solar panels are ground installed, are they to be considered a structure? To highlight a possible issue based on the proposed plan</p> <ul style="list-style-type: none"> • The sizing of a small scale solar panels installation suits your average house, but really in the industrial zone 200m2 is only an installation of 10 x 20 metres for the whole site. • Would Solar panels require consent due to the angle of the installation on any roofing area. • Would installing such panels on the ground in the area noted as paddock fall within these restrictions. <p>We ask that consideration be given within the plan to identify this type of installation differently than general structural work.</p>	
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	

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