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Response Date	Aug 31 22
Notes	
Q1	Select the chapter you want to provide feedback on
Q2	In general, to what extent do you support the contents of this chapter?
Q3	Objective/Policy/Rule/Standard reference:
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?
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Q12	If you need more space, or have any other general comments, please leave them here
	<p>Hi There Thank you for the opportunity to provide feedback on the Draft Waitaki District Plan. Please find attached feedback from Alliance Group Limited. We look forward to discussing this with you soon. Thanks Doyle [cid:rhRMygyleUeRQ59rR1jpAMD_gif] Doyle Richardson Associate +64 27 537 8175 PO Box 489, Dunedin 9054 www.mitchelldaysh.co.nz</p>

31 August 2022

Waitaki District Council
Private Bag 50058
Oamaru 9444

RE: Feedback on Draft Waitaki Plan

INTRODUCTION

Thank you for the opportunity to provide feedback on the Draft Waitaki District Plan ("Draft Plan") which has been released by the Waitaki District Council ("WDC") for public consultation. We appreciate the opportunity to review information ahead of the release of a notified plan.

Alliance's principal interest in the Draft Plan is in respect of how it applies to its Pukeuri Plant and associated farmland at Works Road, Pukeuri.

THE PUKEURI PLANT

The Pukeuri Plant is a red meat processing plant, and as part of the operation Alliance operate a farm, produce their own potable water, treat their own wastewater and discharge it onto surrounding farmland, run a composting operation and a clean-fill landfill. The Pukeuri Plant has a Certificate of Registration to carry out offensive trades and to operate a food premises (the Pukeuri Butcher shop) issued by WDC.

The Pukeuri Plant has been in operation since 1914 and employs approximately 980 people at the peak processing season. Most of the employees are from the Waitaki district with the remainder from South Canterbury.

The Pukeuri Plant processes cattle over seven days in three shifts and processes approximately 520 cattle per day at the peak of the season. There are also three sheep and lamb processing chains, which can process up to 10,500 sheep and lambs per day at peak season.

Further processing is also carried out at the Plant to process meat for export to Europe, Asia, the USA and Canada. Skins are also processed to a stable state for export. Currently, renderable material is processed off site and sent to Timaru and Southland for processing.

Given the type of activities that occur at the Plant, a key concern that can impact on its efficient operation relates to reverse sensitivity effects from the encroachment of sensitive activities into the

area surrounding the Plant. Fortunately, much of this land is owned by Alliance and the Plant doesn't experience significant impacts from reverse sensitivity, but it is something that Alliance continues to be mindful of with evidence of reverse sensitive effects contributing to the closure of industrial activities in New Zealand where sensitive land uses have displaced less sensitive land uses in close proximity to industrial operations.

In the future, Alliance can envisage the need to produce its own energy on site, including using waste or low value materials to produce energy as the business moves to decarbonise its operations. Renewable energy including biogas, wind and solar may form part of that programme.

Well publicised staff shortages in the red meat industry could drive the need for the business to be more creative about how we attract and retain staff. Providing accommodation for workers near the Plant could form part of that picture in the future as is being contemplated at other plants around the country.

Re-establishing rendering activities on site is also being considered due to the pressure that these activities are being put under at our other plants where surrounding land-uses are more sensitive. Sending this material to the Pukeuri Plant for processing is currently seen as a good option given where the Plant is located and the favourable surrounding existing land-uses.

THE KEY PLANNING PROVISIONS OF INTEREST TO ALLIANCE

Under the Draft District Plan:

- The Draft District Plan has renamed the zone in which the Pukeuri Plant is located from "Business 5 Zone" to "Heavy Industrial Zone";
- The storage area to the north of the Plant and its wastewater treatment plant and composting operation located approximately 250m from the eastern edge of the Plant are located in the Rural General Zone;
- The entire Pukeuri Plant and associated farmland is within the Waitaki River Floodplain Assessment Overlay; and
- The entire Pukeuri Plant is within the Waitaki Fault on the Surface Fault Rupture Hazard Overlay.



Figure 1: Draft Waitaki District Council Plan overlays on the Alliance Pukeuri Plan

The use of land for the Pukeuri Plant is currently authorised by section 10 of the RMA (existing use rights) and / or the permitted activity rules of the District Plan. Alliance is interested in the permitted activity rules which apply to the site because any re-configuration of its activities will need to be authorised by the Plan's permitted activity rules or a resource consent.

Alliance acknowledges the intent of the Draft Plan is to provide for its Pukeuri Plant, including the relatively comprehensive suite of provisions which protect the site from new subdivision and development in adjacent areas creating reverse sensitivity effects.¹ However, Alliance has identified the following issues it considers should be subject to further assessment when developing the notified District Plan:

- In a number of places, the permitted activity envelope for built form in the Heavy Industrial Zone is considered to be unnecessarily restrictive insofar as it applies to this site and does not reflect and would not accommodate the extent of development already established;

¹ Strategic Objective SD-RA-03, Policy SUB-P12(11), Policy UB-P16(7), Objective NOISE-02, Policy RESZ-P1.

- The Heavy Industrial Zoning does not extend over the full extent of the industrial activities at the Pukeuri Plant;
- It is not uncommon for an industrial activity like this to contain some kind of sleeping quarters for staff who are required to remain on site overnight and this should be excluded from the rules which attribute 'non-complying activity' status to sensitive activities in the zone;
- The objectives, policies and rules which now apply to the site mean a resource consent will be needed for all new buildings and most earthworks onsite due to it being located within the Waitaki River Floodplain Assessment Overlay;
- The objective and policy direction for the Surface Fault Rupture Hazard Overlay creates uncertainty for redevelopment on the Pukeuri site; and
- How the Draft Plan would provide for a workers camp to be established on General Rural Zoned land adjacent to the Pukeuri Plant.

Each is addressed below.

THE HEAVY INDUSTRIAL ZONE RULE PROVISIONS

The Draft District Plan has renamed the zone in which the Pukeuri Plant is located from "Business 5 Zone" to "Heavy Industrial Zone".

Alliance appreciates the permitted activity rules and standards for the Heavy Industrial Zone are as per those which currently apply to the site under the Operative Waitaki District Plan. However, in a number of places those permitted activity rules do not reflect the existing built form on site and are unnecessarily restrictive insofar as they apply to this site.

Given this zoning only applies to two sites in the District, Alliance considers there to be scope to take a more site specific approach to the permitted activity built form for the Heavy Industrial Zoned area containing the Pukeuri Plant.

Key aspects it would like to discuss with Council being included in those provisions include:

- Provision for buildings up to a height of 25 m;
- Provision for stacks of up to 40 m; and
- An exemption from building setback and landscaping requirements on certain internal boundaries, noting that site buildings extend to the boundary at the eastern and northern ends of the site leaving no space for landscaping.

THE EXTENT OF THE HEAVY INDUSTRIAL ZONE

The Heavy Industrial Zone does not include some key parts of the Alliance Pukeuri Plant, including the lot immediately to the north of the Plant that contains buildings and storage areas. It also doesn't

cover the wastewater treatment plant and composting operation located approximately 250m from the eastern edge of the Plant, which are key components of the industrial operation. Alliance requests that Council consider extending the Heavy Industrial Zone to include those two areas.

PROVISION FOR SLEEPING QUARTERS IN HEAVY INDUSTRIAL ZONES

It is not uncommon for large heavy industrial sites to include some form of sleeping quarters for staff required to remain onsite overnight. These do not create reverse sensitivity effects.

Often in district plan's this activity is captured by the definition of 'sensitive activity' and attributed non-complying activity status. This is problematic when the principle of bundling activity status is applied as it makes the entire activity non-complying despite being a type explicitly provided for in the zone.

At present Alliance reads the Draft Plan as providing for sleeping quarters of this type as a permitted activity in the Heavy Industrial Zone on the basis that:

- It is an activity 'ancillary to' the industrial activity and in turn is captured by the definition of Industrial Activity; and
- It is not captured by the definition of "Sensitive activity".

Alliance seeks this be retained in the Proposed Plan.

WAITAKI RIVER FLOODPLAIN OVERLAY

As can be seen in Figure 1, the new Waitaki River Floodplain Natural Hazard Overlay extends almost the full width of the Pukeuri Plant and the Heavy Industry Zone in this location. The overlay also extends across most of the Alliance owned supporting farmland. The Draft Plan includes a number of new planning restrictions which will apply to the site as a result. They include a requirement to obtain a resource consent for all new buildings² and most earthworks³ onsite.

Alliance is not familiar with the detail behind this flood hazard and the rationale for imposing this additional layer of planning restrictions on this valuable industrial zone. It seeks further discussion with the Council on the matter with a view to ensuring that any new planning restrictions which are imposed are necessary and reflect the most efficient and effective means of addressing the issue at this site, including whether a more extensive permitted activity regime could be explored for buildings and earthworks.

² Rule NH-R4.

³ Rule NH-R5.

WAITAKI FAULT OVERLAY

As can be seen in Figure 1, the new Waitaki Fault Overlay on the Surface Fault Rupture Hazard Overlay extends almost the full width of the Pukeuri Plant and the Heavy Industrial Zone in this location.

Activities in the Heavy Industrial Zone, including Alliance's activities, require buildings that contain hazardous substances.

Draft Policy NH-P11 would require that an application for this type of building demonstrate that:

- the activity or building is setback from the fault to avoid damage associated with fault rupture; and
- any potential effects of fault rupture are mitigated.

Because this overlay almost extends across the full width of the Heavy Industrial Zone it would seem impossible to set back buildings containing hazardous substances from the fault to meet this policy direction. This has potentially significant ramifications for the future development on the site. Similar to the comment on Flood Hazard, Alliance seeks further discussion with the Council on the matter with a view to ensuring that any new planning restrictions which are imposed are necessary and reflect the most efficient and effective means of addressing the issue at this particular site.

PROVISION FOR WORKERS ACCOMMODATION

Labour shortages mean the availability of staff is currently an issue for processing facilities like the Pukeuri Plant. One option that many industries are currently exploring and looking to implement is the establishment of workers accommodation close to key facilities like the Pukeuri Plant. These could comprise units for sleeping purposes, common ablution blocks containing showers and toilets and a common area which includes a kitchen, dining, living and toilet facilities for the employees to use. Land in the General Rural Zone in close proximity to the Pukeuri Plant would be an example of a site potentially suitable for this purpose. Alliance requests that Council consider including specific provision for this type of activity in its new District Plan.

CONCLUDING STATEMENT

Thank you again for providing Alliance the opportunity to provide feedback on the Draft District Plan. In summary Alliance generally supports the Draft Plan with the exceptions being:

- Applying a more site-specific approach to the permitted activity built form for the Heavy Industrial Zoned area containing the Pukeuri Plant;
- Ensuring the extent of the Heavy Industrial Zone includes the entirety of the Pukeuri Plant including key supporting activities;

- The addition of the Waitaki River Floodplain Overlay and the Waitaki Fault Overlay to the Pukeuri Plant and supporting farmland; and how planning restrictions are applied to those areas; and
- Enabling provision for workers accommodation in close proximity to the Pukeuri Plant.

Alliance would welcome the opportunity to discuss the matters raised in this letter further with the Council and looks forward to working with Council staff over the coming months on the provisions.

Yours Sincerely,



Dan Cairns

Alliance Environmental Compliance Manager