



Submission



Waitaki District Council
2030 District Plan Submission

August 2019

Connecting People & Advancing Business

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INTRODUCTION

The Otago Chamber of Commerce (the Chamber) welcomes the opportunity to provide a submission on the Waitaki District Council District Plan 2030 Review. We have already had several discussions with Council staff and submitted to Council previously on specific matters that will form part of the plan. We understand that there will be several more opportunities to discuss the plan and more formal consultation over the coming 18 months or so before the plan is finalised.

The business community generates the wealth on which our region and its residents depend. It is for this reason that we make this submission. The Chamber is pleased to be able to present this submission on behalf of the 1,000 businesses we represent in Otago and specifically 115 North Otago businesses that are our members.

The businesses that we represent are a broad cross-section of business demographics according to size, location and industry. Furthermore, these businesses are representative of the region's wealth generators as well as being owned, managed and staffed by the region's core residents. As such, the Chamber's members are large stakeholders in the economic, social and environmental future of the Otago Region.

The Chamber through its North Otago Advisory Committee has submitted on and been involved in discussions on a number of issues relating to the Waitaki District and we thank Council for your open dialogue with us.

In our approach to the District Plan Review the Chamber will be focussing on those matters that affect business with the desired outcome that Waitaki is business friendly, encouraging business growth and providing an environment where people want to live, work and spend their leisure time. We note that whilst our main focus is on business and industrial zones, we have also considered the business elements in the other zones and provided comment where relevant.

We would welcome the opportunity to speak to this submission.

Strategic Direction

We acknowledge Council's input into a district plan that is future focused whilst taking into consideration the preservation of heritage, cultural and natural environs across the region. We are pleased to review a plan that is preparing for urban development and growth, including: connectivity; fit for purpose design, sustainability, planned infrastructure development and accommodating compatible activities. Also we are pleased to note the plan includes preparing the region for climate change and other possible natural threats, reducing the impact of such events if and when they occur.

The task of managing ever increasing needs and wants of the community need to be balanced by diligent planning, robust budgeting, risk management and accountability.

One key area missing off the Strategic Directions is planning for business development and growth. In considering this we believe that the prosperity of the district is dependent on population growth/stability and that business is essential to this. Successful business is required to create jobs which pay staff a remuneration that allows for them the live sustainably in our community.

The plan should be an enabler and create opportunities for employment. With an aging population every job counts for the future vibrancy of the district.

Planning for Business Development and Growth might include the following points.

- We will ensure there is a good supply of business and industrial land, supported by appropriately scaled infrastructure.
- We want to encourage vibrant town centres by creating an environment that supports modern retail business, hospitality, recreational and residential development.
- We recognise that technology and lifestyle changes mean in addition to the traditional bricks and mortar businesses, the plan must provide the flexibility for business to thrive using new technologies.
- We will plan for the needs of our tourism businesses by making sure we allow for tourist accommodation, attractions and services that complement and enhance the local environment.

We support a plan that provides flexibility, and is an enabler for the region to adapt to ever-changing living arrangements, employment and business opportunities, shopping and entertainment offerings.

We would like you to consider adding “business development and growth” as one of the key strategic issues facing the District.

Energy, Infrastructure & Transport

The Chamber is pleased to note that the Council is planning to provide a more integrated response to developing infrastructure to achieve environmental and social outcomes. Well planned and co-ordinated infrastructure development is key to the future development of the region.

We also support the focus on large scale energy generation, whilst encouraging and providing for small scale renewable electricity generation.

In regards to transport, consideration on the flow of traffic, access and maximising efficiencies and productivity are essential for the development of roading in the region.

Natural Hazards

It is vital that the Council maintain an updated natural hazards register, mapping all known natural hazards and identifying hazard-prone areas, so that planning can be put in place to prevent or reduce the impact of a natural hazard occurring.

Storm water is an issue at the Northern end of Oamaru and the current district plan shows significant flood areas. These floods zones now need better management so as to support the activities in the area and transport to the north. On newly developed land, storm water management should be a consent requirement on the developer. For this to be supported the Council must improve the storm water network before and after the industrial zones.

It is also important that contaminated land and its potential adverse effects are identified and mitigated.

The intention of the Council to review the way it manages hazardous substances is welcomed, in particular that there will be a permissive approach to the storage and use of hazardous substances that do not trigger a high risk to people or the environment.

Historical Heritage

Whilst we are in support of recognising the current Oamaru Historic Area we continue to oppose the expansion of that area on to Thames Street.

In 2016 we submitted against the Heritage New Zealand Oamaru Historic Area List no 7064 and reiterated our view earlier this year in our submission on Heritage Buildings and Areas in which we stated that:

We opposed the (Thames St) heritage zoning because we felt the heritage elements were at low risk, with Council the owner of the best heritage building and evidence that the property developers in the main street were already embracing and enhancing their buildings.

Our fear is that extra compliance costs and a more challenging consent process, will discourage businesses to invest. Low quality buildings, small titles, an unwelcoming customer streetscape will lead to low rent businesses which then builds on itself.

After 20 years the Harbour and Tyne Street area still struggles to find high quality, sustainable anchor tenants who are able to pay rents that provide the landlord a commercial return on their investment. The area continues to need support from grant agencies. We don't think this is an ideal situationshould not be extended into the Thames Street area.

We acknowledge that this zone is now in place and it is our understanding (and please correct us if we are wrong) that Council has a legal obligation to include this in the plan. We do have concerns on behalf of landlords and tenants that the points we made in our earlier submissions are real risks we face. We acknowledge Council is taking some steps to mitigate these risks.

We agree with the plan that there should be stronger rules around the demolition or damage to identified historic heritage buildings and stronger controls around managing earthworks. The Chamber also supports sympathetic structure upgrading and the **adaptive reuse** of heritage buildings. However, we want to ensure that the rules put in place encourage investment and development. We want to make it easier for heritage building owners to restore, repurpose and earthquake strengthen their properties.

We thank you for forwarding us the draft Historical Heritage Chapter for feedback. More detailed feedback will be provided on the draft historical chapter of the District Plan in a separate document (due 23 August 2019).

Oamaru must have a vibrant town centre that supports modern retail business. We support a plan that enables this in the context of a heritage environment.

Area Specific Matters – Zones

North End Business/Industrial

It is positive to note that the plan supports ensuring that there is sufficient Industrial zoned land in the right places and that demand for industrial space should be analysed

The dairy factory at Glenavy shows how big industry can develop quickly. The plan needs to allow flexibility for the district to accept a new large employer anywhere that it works for them, be it Omarama, the Waitaki Valley or Palmerston. The likes of Macraes and Pukuri are essential to the districts employment both directly and indirectly.

We support investment in infrastructure and flood mitigation North/South so as not to put supply chains at risk now or into the future. Equally climate change mitigation is essential for the district and business for the future.

The upgrade and possible widening of TY Duncan road as a main access to the highway is supported and should be included in the draft responses. Access from the Industrial zones (both sides of the railway line) to the highway is essential.

We believe the North End business and industrial zone provides sufficient space adjacent to rail and road networks for the foreseeable future, however at some point the north end of the industrial zone on Shortland Road should join TY Duncan Road. If the current zoning of this land is an inhibitor to the roading infrastructure from Shortland Road to TY Duncan Road to SH1, consideration should be given to adding the land to the industrial zone.

Industrial Place is a private road and is maintained to a poor quality. With a busy fuel stop and Council's supplier of waste management services operating from there, the time has come that Council should consider seeking to get the road vested in Council and maintained to an appropriate standard.

The development of residential living and visitor accommodation in the industrial zones is a matter that needs to be approached with consideration to the ongoing use of these areas as industrial. We are concerned that residential lifestyle development would be incongruous with industrial neighbours to the zone and don't believe these areas are suitable for residential development.

The development of the North end industrial zone has been a huge success and maintaining the industrial and business zones is supported.

We would like you to plan to better manage stormwater in the North of Oamaru business and industrial zones.

We would like to see a clearer plan for appropriate transport access from the industrial / business areas onto the state highway.

Commercial and Mixed Use Zones

Oamaru CBD

3 zones (Harbour side, Historic precinct and City Centre) need to be looked at as an integrated approach.

As the population grows and people travel more freely, the current provision for public carparks in the CBD is barely adequate and has no room for growth. We support the provision of additional Council provided public parking for both workers and customers. More land needs to be set aside and developed for worker all day parking. This could partly be achieved by removing

Council vehicle/lease parking from Steward Street carparks (both sides) supporting retail, aquatic centre and hospital visitors.

The District Plan should encourage high density residential development opportunities in the Oamaru CBD. This should not be restricted to above street level but also at street level where vacancies exist. People living in the CBD adds considerable vibrancy to a CBD, and in other centres, and should be encouraged for this reason.

In order to attract and retain national chain retailers/anchor tenants, smaller titles may need to be amalgamated to create more access for retailers on Thames Street while protecting Heritage frontages. Attracting anchor tenants (most probably locally operated national chains) to the CBD is critical to the vibrancy and viability of the space to Council, property owners and retailers.

The current CBD Design Guide needs updating but largely should remain as a guide and not locked into the plan. Reviewing the guide in some spaces it is quite apparent how views have changed and having flexibility will help us address the changing needs of the future. We will comment further on this in consideration of the Historical Heritage Chapter.

We support limiting large retail developments outside of this area in order for it to remain the main retail space.

The Chamber supports the continued dialogue between stakeholders and the wider public around a "Zone based approach" to future developments and projects.

SH1 to Humber Street West of the Main Trunk Railway

This is the area of greatest challenge. We have some good industry in this area, but we also have space created by some industries moving out. Development in this area is frustrated by a lot of small lots, making land expensive and uneconomic for industrial development.

We support the view that this is good flat land to build affordable housing close to amenities. It also supports a lot of jobs. However, much of the housing in this area is currently low quality and we would like to see more quality housing developments in this area.

Small titles and proximity to town and other businesses supports light industry. This needs to be retained. There are some existing use businesses that if starting today would seek greenfield space to the north, which is more suitable for expansion.

Parking in this area is certainly an issue which needs to be reviewed for both business and residents.

Consideration of options in this zone needs more thought.

East of Main Trunk North of Humber Street

The industrial zone through here expands to north and should be maintained. Erosion is a known factor that limits the potential use of this land. Current uses have limited capital investment and it is effective yard and storage space which should be retained.

Residential Zones

Changes in technology and the way we live means a lot of people are able to operate businesses without the need for bricks and mortar CBD premises. These businesses will be a mix of internet traders (with the goods never appearing locally), internet support workers (for example providing midnight help desk support to Europe), internet bloggers and influencers, consultants, short-term accommodation providers, small part-time operations supporting the family and hobbyists. They all add value to our community.

We support businesses operating in residential zones, with caveats to ensure no adverse effects on neighbourhoods. These activities should be permitted within certain limits on scale and effects.

We also endorse the proposed review of current capacity to ensure there is sufficient opportunity for future demand with infrastructure in place to support this occurring.

Higher density housing options and zoning in appropriate locations is an excellent concept, particularly for the CBD. We also applaud incentivising well designed new developments with less regulation.

Sustainable living options are essential for future developments, we support the concept of facilitating low impact energy use and water use, and on-site small-scale energy generation existing and new developments.

Township Zones

It is our understanding that the small towns of the district will be in township zones that have mixed use, including business. At this stage this appears to provide sufficient flexibility for most businesses. There should be provision for retail and light industry in all these places.

Rural Zones

We continue to support extraction industries as they remain essential to development in the district, region and in fact the country. The plan must continue to be permissive of extraction activities.

We support maintaining the current cement works zone. While the last proposal didn't make it to go, the natural resources which support this industry remain and there are no indications that cement production will be obsolete.

We recognize farming, horticulture, forestry and aquaculture as businesses essential to our district and as large employers. We have not commented on these as we expect those industries are well supported for involvement in this process.

We support the development of business at Oamaru Airport and Omarama airfield.

CONCLUSION

The Chamber submission is made in the positive spirit of developing a partnership with Council that supports and encourages business friendly innovation and growth for the benefit of all Waitaki residents. It is submitted on the basis that it provides feedback and the opportunity to further engage with the Council on a number of issues.

We are committed to joining and working with the Council to achieve our shared objective of attracting and encouraging the development of business opportunities in Waitaki.

In the long term it is about determining the shared values of the community, which will in turn make decision making easy.