

Submission Form

Proposed plan change 4 Proposed Amendments to the Tairāwhiti Resource Management Plan (Inner Harbour Car Parking)

Including the following changes:

- A 100% parking exemption zone within Port Management Zone A (Inner Harbour waterfront)
- A 50% parking exemption zone within Port Management Zone A (Eastern side of The Esplanade)
- A new policy and explanatory note that seeks to ensure consistency between the proposed car parking rules and the objectives for managing infrastructure within Port Management Zone A. (These proposed changes are set out in Appendix 1 of this report).

Submissions close 5pm, Friday, January 19, 2018

To Gisborne District Council,

Submitter name Ngati Porou Fisheries Ltd

(For organisations, please include the full name of your organisation. For individuals, please include your first, middle and last names)

1. I/we could could not gain an advantage in trade competition through this submission

(If you could, your submission must only comment on adverse effects to the environment that would directly affect you and your submission must not relate to trade competition)

2. I/we wish do not wish to present my submission at a hearing

(Please tick one box)

3. If others make a similar submission, I/we will will not consider presenting a joint case with them at a hearing

(Please tick one box)

4. Signature of person authorised to sign on behalf of submitter 

5. Submitter contact details

Name Ken Houkaman Date 19/01/2018

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Phone 06 868 1644 Email khoukaman@npsl.co.nz

Organisation Ngati Porou Fisheries Ltd

Post to

Gisborne District Council
PO Box 747
Gisborne 4040
Attention: Strategic Planning Team

Deliver to

Council offices at
Te Puia Springs or
Fitzherbert Street
Gisborne

Email to

Plan.Changes@gdc.govt.nz

(1) The specific provisions of the proposal that this submission relates to are:

See attached

(2) My/our submission is:

(Include whether you support or oppose the change or wish to have the change amended; and reasons for your views)

See attached

(3) I/we seek the following decision from Council:

(Give details of what parts you want Council to adopt or reject and any amendments you want to the proposal)

See attached

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(Give details of what parts you want Council to adopt or reject and any amendments you want to the proposal)

Add further pages as required – please initial any additional pages.

Privacy information: Please note that all submissions will be made publicly available at Council offices and the HB Williams Memorial Library. A summary of submissions including the name and contact details of the submitter may also be made publicly available including posting on the Council website. Personal information will also be used for administration relating to the subject matter of the submissions, including notifying submitters of hearings and decisions. All information will be held by Gisborne District Council with submitters having the right to access and correct personal information.

IN THE MATTER

**Proposed Plan Change 4 to the
Tairāwhiti Resource Management
Plan**

BETWEEN

Ngati Porou Seafoods Limited

Submitters

AND

GISBORNE DISTRICT COUNCIL

Respondent

Submission from Ngati Porou Seafoods Limited to Plan Change 4 to the Tairāwhiti Resource Management Plan

(1) The specific provisions of the proposal that my submission relates to are:

1. Section 2.1 – Transformation of Gisborne Inner Harbour.
2. Section 4.3 – Existing User Needs for Inner Harbour Car Parking (Other Businesses).
3. Section 4.4 – Tairāwhiti Plan Requirements (C.2.1.3 Objectives – Infrastructure).
4. Appendix 4 – Stakeholder Engagement.

(2) Our submission is:

Presented on behalf Ngati Porou Seafoods Limited (NPS) the commercial asset-holding company established under the Maori Fisheries Act 2004 to receive and manage the fisheries settlement assets of Ngati Porou.

In 2007 NPS acquired site # 49 from Aotearoa Fisheries Ltd and took over the lease commitments for sites # 47, 51, 53, 55, and 57 which form a critical part of our business operational activities. These include;

- Real Fresh from the Sea. Our regional retail business servicing Gisborne, the coast and down to Wairoa.
- Ahia, our national smoked fish production and distribution business.
- Contract Finfish processing and handling for national and international markets.
- Contract Live Lobster handling and swimming facilities, for export markets.
- Business administration and management functions.

As long-term property owners, tenants, and users located in the inner harbour area for the last 10 years and through our associate company, Aotearoa Fisheries Ltd for the last 30 years, we have contributed significantly to the region's economy and employment.

NPS, like other stakeholders that occupy the inner harbour area, are concerned about the short and longer-term effects and impacts that the Proposed Plan Change 4 will have on our business operations and activities.

Concerns and Comments:

Section 2.1 – Transformation of Gisborne Inner Harbour

As a comment, NPS is 100% supportive of the plans to transform the inner harbour area, however, we do not believe this should be done in a manner that disadvantages those owners and tenants that have maintained this area for many years and in many cases at their own cost.

As a concern, due recognition and engagement must be given to these groups, which we feel has not been conducted in a satisfactory and fair manner.

Section 4.3 – Existing Needs for Inner Harbour Car Parking

We are one of the seemingly insignificant inner harbour users that is thrown under the banner of 'Other Businesses' which is interesting considering we span across 6 commercial sites and have significant heavy vehicle movements in this area.

The report to council indicates that 'no specific car parking issues have been raised'. This is absolutely incorrect.

In our engagement with council staff we have gone to great lengths to indicate our parking requirements for staff and customers which have not been addressed satisfactorily in our view with little to no feedback.

a. Parking Layout

The reductions and changes to the inner harbour parking we believe will have a significant negative impact on our business. Our retail shop 'Real Fresh' is recognised for the freshest fish in Gisborne with the convenience associated with marked parking directly outside the outlet.

At present, directly in front of the shop there is a carpark area that accommodates for up to six vehicles. The plan in its current iteration reduces this to zero. It only allows for five short-term parks, one further up the Esplanade and four on the other side of the road. The plans will cause inconvenience for our customers by removing direct access to the store and requiring them to parallel park after having to make a U-turn further up the Esplanade. Our retail business requires quick, high turn-over of customers, and the current plans do not enable this.

NPS also suggests the parking proposal will lead to negative competition amongst inner harbour customer bases. Using the four planned parallel parks adjacent to 'Real Fresh' as an example, they will be used by customers to other businesses as they will be the most convenient parks, further exacerbating convenient access for 'Real Fresh' customers.

The Proposed Change will lift current development restrictions through the introduction of a 100% parking exemption area within the waterfront area and a 50% parking exemption area for the remainder of Port Management Zone A. New business development in the area will lead to increased car park demand, we again highlight this will adversely affect our business.

b. Current Parking Situation:

The “current state” of parking in the inner harbour is based off a study completed over 5 years ago during one week in November. NPS question how, what equates to a snapshot conducted many years ago, can be used to represent the current dynamic? As NPS frequently experience, there are many times the entire area is extremely busy and parking is an issue.

Simply estimating the amount of parking space needed to adequately accommodate current and future demand, fails to recognise what businesses like ours require to effectively operate. To retain customers, NPS have certain requirements and expectations to meet, the GDC’s assertion that a small window of data collected in a 2012 survey reflects these requirements of not only NPS but other affected businesses in 2018 is not correct.

As stated the parking situation is going to negatively affect our business. To accommodate this NPS would have to develop off street parking on its own site for designated customer car parking. This would come at a considerable expense. It would also increase health and safety risk to both employees and customers, with the space available, it would be difficult to remove operational activities completely from where customers could be.

Furthermore, NPS has plans to grow significantly in the coming years, which will mean increased staff levels from 30 to 50 and increased operational activity. This, which doesn’t consider new businesses that are likely going to establish in the area, will further compound our current concerns.

Section 4.4 – Tairawhiti Plan Requirements (C.2.1.3 Objectives – Infrastructure).

NPS would like to note, after discussions with the GDC, changes were made to the plans to accommodate our vehicle movements into and out of the factories which is positive. However, NPS still have concerns how the plans are going to impact our business functionality.

For example, waste removal trucks currently park on the side of the road to load our fish waste bins. This cannot be completed onsite in the space available. With the narrowing on the road and no allocated loading bays this task is going to be very difficult and will also be a health and safety risk.

If a safe environment is important, which it is, then we believe the concerns raised with council staff regarding heavy vehicle movements in what will be a significantly reduced space, particularly in front of our business need to be better considered before the plans go ahead.

Appendix 4 – Stakeholder Engagement:

Current process for consultation has been deeply flawed and poorly communicated in our view.

As a long time, tenant and property owner in the area, NPS is extremely disappointed that concerns around parking have been largely ignored.

NPS has concerns with both the plans and parking provisions and have communicated this on many occasions.

A clear example of the poor council engagement is that NPS is being notified about some key updates on the project and plans from other concerned stakeholders who have received notices

from the GDC and we have not, why is this? As an owner and tenant in this area we should receive all notices relevant to this process.

The GDC is in danger of showing itself to have an outcome in mind for the parking plan and will make it happen regardless of objections by tenants that have and will continue to operate in the area.

Summary:

- a. NPS is not against the inner harbour development. We believe there will be tangible and intangible benefits to NPS and the community with a more vibrant inner harbour.
- b. The plans will negatively impact our business, particularly our retail business 'Real Fresh', due mainly to the inconvenience the parking provisions will put on our customers.
- c. NPS have concerns about how the development will affect our truck movements as no satisfactory loading bays are planned alongside our business.
- d. NPS believes the assumptions around parking requirements and impacts are based on data that does not reflect the situation correctly. The way the parking plan has been designed is going to create tension between inner harbour business customer bases causing further impact on our business.
- e. NPS believe if a better collaborative process is undertaken by the GDC then gains and compromises can be discussed by stakeholders to create plans that will work for all. NPS reiterate our frustration and concern that from long-term stakeholders like ourselves with ambitious future goals have been largely ignored.

(3) We seek the following decision from the council:

NPS seek parking provisions that adequately accommodate our "Real Fresh" customers.

NPS seek re-engagement and agreement between stakeholders about the car parking provision in the Inner Harbour Area. These provisions need to be based on up to date reliable parking information, and more a more reliable prediction of future car parking demand.

NPS seek agreement with the Council on a longer-term approach to provide additional Council car parking infrastructure to deal with the additional car parking demand resulting from new development. Such an approach should include purchases or leases of land, and potentially the development of a car parking building.

Noho ora mai,



Kenneth Houkamau
Ngati Porou Seafoods Ltd
Resource and Project Manager

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