

CHRISTCHURCH DISTRICT PLAN

PRIVATE PLAN CHANGE 19

MARSHS ROAD INDUSTRIAL

**PLANNING OFFICER'S REPORT OF KIRK JOSEPH LIGHTBODY UNDER SECTION
42A OF THE RESOURCE MANAGEMENT ACT 1991**

25 SEPTEMBER 2026

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LIST OF ABBREVIATIONS

CDP	Christchurch District Plan
CRPS	Canterbury Regional Policy Statement
SDP	Selwyn District Plan
CRDP	Christchurch Replacement District Plan
IMP	Mahaanui Iwi Management Plan
ITA	Integrated Transport Assessment
LURP	Land Use Recovery Plan
NES HAIL	National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health
NPS	National Planning Standards 2019
NPS UD	National Policy Statement on Urban Development 2020
NPS HPL	National Policy Statement on Highly Productive Land 2022
NZCPS	New Zealand Coastal Policy Statement
PPC19	See 'the plan change'
RMA / the Act	Resource Management Act 1991
s32 / s32AA	Section 32 / Section 32AA of the RMA (evaluations)
the Council	Christchurch City Council
the Plan/CDP	Christchurch District Plan
the plan change	Proposed Private Plan Change 19
the Frontage Properties	200 – 300 Main South Road/State Highway 1 120 – 200 Marshs Road
BCA	Greater Christchurch Business Capacity Assessment

1 EXECUTIVE SUMMARY

- 1.1.1 I have been asked by the Council to prepare this report pursuant to section 42A of the Resource Management Act 1991 (**the Act/RMA**). The report considers the issues raised by submissions to Private Plan Change 19 (**the plan change / PPC19**) to the Christchurch District Plan (**CDP**).
- 1.1.2 The discussion and recommendations included in this report are intended to assist the Hearing Commissioner and submitters on PPC19. The recommendations contained within this report are not the decision of the Hearing Commissioner.
- 1.1.3 Private Plan Change 19 (PPC19) seeks to rezone approximately 23 hectares of Rural Urban Fringe Zone (RuUF) to Industrial Heavy Zone (IH). The request includes the rezoning of 34 residential properties each approximately sized 800m², and five larger lifestyle blocks ranging from 2ha to 4ha in area.
- 1.1.4 Private Plan Change 19 proposes, in summary, the following changes to the Christchurch District Plan.
- a. Insertion into Chapter 16, 16.5.4.2.3 (a)(iii)(A) and (B), new rules which would require a 20m building setback of industrial heavy activities from residential properties to apply until 1 January 2036. After 1 January 2036 no setback would apply.
 - b. Amendment of Appendix 16.8.8 – South West Hornby Industrial Area Outline Development Plan to extend the South West Hornby Industrial Area Outline Development Plan (ODP) and include the land subject to this request. The ODP proposed change includes a a new minor arterial road accessed from the SH1/Pound Road intersection.
 - c. Changes to the provisions of Chapter 16.5.4 Industrial Heavy Zone (South West Hornby) Area Specific Rules, to mitigate potential adverse effects. The key proposed change is the addition of 16.5.4.2.3 (a)(iii)(A) and (B), which would require a 20m building setback of industrial heavy activities from residential properties to apply until 1 January 2036. After 1 January 2036 no setback would apply.
 - d. Amendments to the relevant Planning Maps 36 to reflect the amended extent of Heavy Industrial Zone.
- 1.1.5 The standard RMA Schedule 1 process was followed in processing this private plan change request.
- 1.1.6 26 Submissions were received of which 22 opposed the proposed rezoning. The proposal to rezone residential properties, albeit Rural Urban Fringe Zoned, and the potential impacts of heavy industrial activity use on those properties are a key theme of the report that follows. I have considered the potential impact Industrial Heavy Zone would have on the residential properties

and consider the Industrial Heavy Zone an incompatible neighbouring zone. I have evaluated options to still deliver what I consider is needed industrial development capacity and concluded that Industrial General Zone is the most appropriate zone for the plan change area.

- 1.1.7 Submitters also sought that their residential properties were not rezoned to industrial, in my view the s32 analysis does not comprehensively justify the benefits and costs of rezoning those properties. I invite the proponent to provide more information on the appropriateness of rezoning the frontage properties.
- 1.1.8 I have assessed the proposal against the relevant national direction and mostly relevantly consider the request gives effect to the NPS-UD and NPS-HPL. Regarding the NPS-UD I conclude that the request constitutes significant development capacity and will contribute to a well-functioning urban environment. I have evaluated the criteria in the NPS-HPL and found that the request may be approved for rezoning due to the long-term shortfall of industrial land.
- 1.1.9 I have evaluated the proposal and recommend that PPC19 be approved with amendments. My recommended District Plan provisions and indicative zoning maps are included in **Appendix 2 and 3**.
- 1.1.10 Without those recommended amendments I consider that PPC19 as notified does not:
- a. Address potential significant adverse environmental effects that arise from Heavy Industrial Activities
 - b. Substantiate the benefits or quantify the costs of the rezoning to the extent necessary to demonstrate that PPC19 is more effective and efficient than the operative RuUF provisions for the residential properties.
- 1.1.11 In accordance with the further evaluation undertaken under section 32AA of the RMA, I consider that the provisions with recommended amendments are the most appropriate way to achieve the objectives of the Plan and the purpose of the RMA.

2 INTRODUCTION

2.1 REPORTING OFFICER

- 2.1.1 My full name is Kirk Joseph Lightbody, I am employed as a Senior Policy Planner in the City Planning team of the Christchurch City Council (**the Council**). I have been employed by the Council since 2022. I hold a Bachelor of Resource and Environmental Planning (Hons) degree from Massey University. I am an intermediate member of the New Zealand Planning Institute.
- 2.1.2 I have 9 years' experience in planning and resource management in New Zealand. Prior to my current role at Christchurch City Council, I was employed by the Manawatu District Council in consents and policy planner roles. My experience relevant to this hearing includes preparing expert evidence on changes to the Christchurch District Plan concerning the NPS-UD and commercial/industrial matters. I have also prepared expert planning evidence on behalf of Christchurch City concerning the application of the NPS-UD to sub-regional growth in Greater Christchurch.
- 2.1.3 My role in preparing this report is that of an expert planner.
- 2.1.4 Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note and I agree to comply with it. I confirm I have considered all the material facts I am aware of that might alter or detract from the opinions that I express. I confirm this evidence is within my area of expertise, except where I state I am relying on the evidence of another person.
- 2.1.5 I confirm that, while I am employed by the Council, the Council has agreed to me providing this Section 42A report in accordance with the Code of Conduct.

2.2 THE PURPOSE AND SCOPE OF THIS REPORT

- 2.2.1 This report has been prepared in accordance with Section 42A of the RMA to assist the Hearing Commissioner in considering the issues raised by submissions and further submissions to PPC19. It makes recommendations on PPC19 and submissions and further submissions received on it. Where I recommend substantive changes to the plan change provisions, I provide an assessment of those changes in terms of section 32AA of the RMA.
- 2.2.2 The purpose of this report is to:
- a. highlight relevant information and issues regarding PPC19, in terms of the statutory requirements;

- b. consider the issues raised and the relief sought in submissions and further submissions, and then make recommendations on whether to accept or reject each submission and further submission point. Where appropriate, this report groups submission points that address the same provision or subject matter.

2.2.3 My recommendations as to accept, accept in part or reject of the submissions and further submissions received can be found in **Appendix 1 – Table of Submissions with Recommendations and Reasons**.

2.2.4 The scope of this report includes:

- a. An overview of PPC19, including background and a brief summary of matters relevant to the plan change;
- b. Statutory considerations and instruments as outlined in the Section 32 report
- c. Matters relevant to the Plan Change
- d. Analysis and Evaluation of Statutory Instruments
- e. Analysis and evaluation of submissions and further submissions received, and recommendations;
- f. Consideration of the Private Plan Change in terms of Part 2 of the Act;
- g. Conclusions and recommendations.

2.2.5 In addition to considering the Section 32 report and the submissions, I have taken into account the advice and recommendations of the following experts

- a. Liqi Chen (CCC) – Transportation – (refer to **Appendix 8**)
- b. Brian Norton (CCC) – Stormwater – (refer to **Appendix 7**)
- c. Ramolin Naidoo (CCC) – Wastewater and Water - (refer to **Appendix 6**)

2.2.6 As required by Section 32AA, a further evaluation of recommended changes to the amendments proposed in PPC19 has been undertaken in this report.

2.2.7 Any conclusion and recommendations made in this report are my own and are not binding upon the Commissioner or the Christchurch City Council in any way. The Commissioner is required to consider all submissions and evidence presented at the hearing. It should not be assumed that the Commissioner will reach the same conclusions as I have when they have heard and considered all the evidence presented.

3 PRIVATE PLAN CHANGE 19 OVERVIEW

3.1 EXISTING PLAN PROVISIONS

- 3.1.1 The proposed plan change area is currently zoned Rural Urban Fringe Zone in the CDP. The CDP anticipates that enabled land uses in this zone will be of a rural nature such as agriculture, pastoralism, small scale rural industry/commercial and rural living down to 4ha. The request's proposed land use of industrial is not permitted nor anticipated in the Rural Urban Fringe Zone.

3.2 SUMMARY OF THE PLAN CHANGE

- 3.2.1 Private Plan Change 19 (PPC19) seeks to rezone approximately 23 hectares of Rural Urban Fringe Zone (RuUF) to Industrial Heavy Zone (IH). The request includes the rezoning of 34 residential properties each approximately sized 800m², and five larger lifestyle blocks ranging from 2ha to 4ha in area.
- 3.2.2 For the purpose of this report, the residential block bounded by Marsh's Road and SH1 including 671 - 727 Main South, 5 - 25 Marshs identified in figure 1 is herewith referred to as the Frontage Properties.

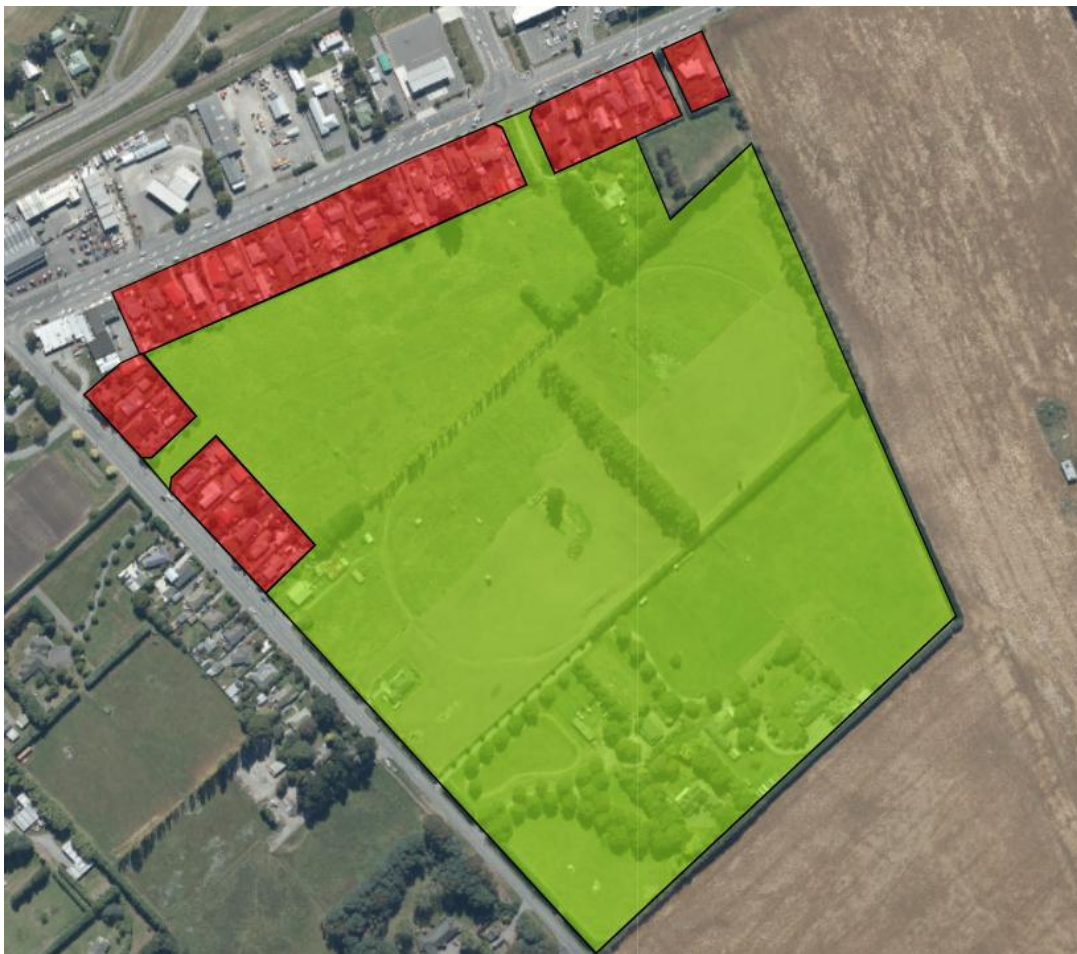


Figure 1 Frontage Properties (Red) Rural Block (Green)

3.2.3 Private Plan Change 19 proposes, in summary, the following changes to the Christchurch District Plan.

- a. Insertion into Chapter 16, 16.5.4.2.3 (a)(iii)(A) and (B), new rules which would require a 20m building setback of industrial heavy activities from residential properties to apply until 1 January 2036. After 1 January 2036 no setback would apply.
- b. Amendment of Appendix 16.8.8 – South West Hornby Industrial Area Outline Development Plan to extend the South West Hornby Industrial Area Outline Development Plan (ODP) and include the land subject to this request. The ODP proposed change includes a new minor arterial road accessed from the SH1/Pound Road intersection.
- c. Changes to the provisions of Chapter 16.5.4 Industrial Heavy Zone (South West Hornby) Area Specific Rules, to mitigate potential adverse effects. The key proposed change is the addition of 16.5.4.2.3 (a)(iii)(A) and (B), which would require a 20m building setback of industrial heavy activities from residential properties to apply until 1 January 2036. After 1 January 2036 no setback would apply.
- d. Amendments to the relevant Planning Maps 36 to reflect the amended extent of Heavy Industrial Zone.

3.2.4 A copy of the notified plan change is viewable [here](#).

4 STATUTORY CONSIDERATIONS UNDER THE RESOURCE MANAGEMENT ACT 1991

- 4.1.1 The section 32 report provides an outline of key RMA matters to be considered by the plan change.
- 4.1.2 Among other things, s74 of the Act requires a local authority to prepare and change its district plan in accordance with its functions under section 31, its obligations to prepare and have regard to an evaluation report in accordance with Section 32, national policy statements and planning standards, and the provisions of Part 2.
- 4.1.3 Part 2 sets out the overarching purpose of the RMA (Section 5) and includes matters of national importance (Section 6), other matters that require particular regard in achieving the purpose of the Act (Section 7) and the Treaty of Waitangi (Section 8).
- 4.1.4 Section 75(3) requires the Council to give effect to any national policy statements and national planning standards. In my opinion, the key national policy statements relevant to this request are the NPS-UD and NPS-HPL.

- 4.1.5 Section 75(3) requires the Plan to give effect to a regional policy statement. The relevance of the Canterbury Regional Policy Statement to this plan change and the submissions received is discussed in section 6.7.
- 4.1.6 Section 76 outlines the purpose of district plan rules, which is to carry out the Council's functions under the RMA and achieve the objectives and policies of the Plan. In making rules, the Council must have regard to the actual or potential effects of activities on the environment, including adverse effects.
- 4.1.7 Clause 21 of the First Schedule of the RMA permits any person to make a request to change the District Plan and the Council must publicly notify the change unless it falls within the limited grounds set out in Clause 25(4) and is rejected in whole or in part. This request was accepted for notification but this does not indicate that the Council supports the private plan change request in full or in part.

5 MATTERS RELEVANT TO THE PLAN CHANGE PROPOSAL

5.1 OVERVIEW

- 5.1.1 The following section provides a summary of the matters relevant to the proposal based on the actual and potential effects of the proposed rezoning, matters raised by submitters, and references where in this report I have addressed the matters arising.
- a. Incompatible Activities/Zoning Approach – see section 7.3 of this report;
 - b. Economic effects – see section 7.4 of this report;
 - c. Building Setbacks – see section 7.5 of this report;
 - d. Landscaping, Screening and Noise from Selwyn District – see section 7.6 of this report;
 - e. Transport effects - see section 7.7 of this report;
 - f. Waste Water and Water Infrastructure – see section 7.8 of this report;
 - g. Stormwater Management – see section 7.9 of this report;
 - h. Geotechnical ground conditions – see section 7.10 of this report;
 - i. Land contamination – see section 7.11 of this report;
 - j. Bird Strike Management – see section 7.12 of this report;
 - k. Groundwater quality - see section 7.13 of this report
 - l. Role and function of Templeton – see section 7.14 of this report
 - m. Design of industrial buildings – see section 7.15 of this report

- 5.1.2 Issues related to actual and potential effects of the proposal have been considered by the request in the Section 32 Evaluation and in an Assessment of Environmental Effects attached to the Private Plan Change.
- 5.1.3 Matters raised in submissions will be discussed throughout this report in section 7. Where further amendments to the provisions proposed by the Plan Change are recommended, I have specifically considered the obligations arising under s32AA.

6 EVALUATION OF STATUTORY INSTRUMENTS

- 6.1.1 As noted previously in Section 4 of this report, the CDP as amended by PPC19 must:
- a. *"Give effect"* to any operative national policy statement (section 75 (3)(a)) and any regional policy statement (section 75 (3)(c)).
 - a. *"Have regard"* to any management plan or strategy prepared under other Acts (section 74 (2)(b)(i)).
 - b. *"Take into account"* any relevant planning document recognized by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district (section 74 (2A)).
 - c. *"Not be inconsistent"* with any regional plan (section 75 (4)(b)).
- 6.1.2 The extent to which PPC19 satisfies these statutory tests in the context of changes to the CDP are evaluated further below.

6.2 NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT

- 6.2.1 The NPS-UD is the preeminent national planning direction when it comes to urban environments in New Zealand. Summarising the direction of the NPS-UD, the planning document encourages greater density in urban centres and where appropriate expansion of urban environments. The NPS-UD requires territorial authorities to provide sufficient development capacity for the short, medium and long term.

Is the NPS-UD and Policy 8 applicable? Is this request a local authority decision affecting an urban environment?

- 6.2.2 Policy 8 of the NPS UD outlines that local authority decisions affecting urban environments are to be responsive to of out-of-sequence plan change requests that are significant capacity and contribute to refunctioning urban environments. The first limb of this policy framework is whether the private plan change represents a local authority decision affecting an urban environment.

- 6.2.3 An urban environment is defined in the NPS-UD as any area of land that:
- a. is or is intended to be predominately urban in character; and
 - b. is, or is intended to be, part of a housing and labour market of at least 10,000 people.
- 6.2.4 The first limb of the definition is determining whether the area of land nearby the site, being Christchurch City, is predominantly urban in character or not. On that matter, the CDP enables significant building height in its commercial centres upwards of 50m, retail outlets, office buildings, residential apartments, terraces, units and standalone dwellings, and a variety of places of work in industrial hubs that include logistics and manufacturing. I consider the area of land surrounding the request site to be predominately urban in character.
- 6.2.5 Turning to the second limb of the definition, Christchurch City has a population exceeding 400,000 residents, thus I consider Christchurch City to be part of a housing and labour market of at least 10,000 people.
- 6.2.6 Finally, does this request affect Christchurch City's urban environment? Yes, the request is to rezone land and enable land use that would contribute to the projected long-term shortfall of industrial land and is a continuation of an existing industrial ODP. Overall, I consider the request constitutes a local authority decision affecting an urban environment and can be considered against the other limbs of Policy 8.

Does the request constitute significant development capacity?

- 6.2.7 The Policy 8 responsiveness policy has two limbs to it, the first being whether the development capacity is 'significant'. The second limb is whether the development capacity would contribute to a well-functioning urban environment.
- 6.2.8 Turning to the first limb of whether the development capacity would be significant or not, I consider that additional yield/supply is the most appropriate method to identify significance. I consider the individual Council's development capacity sufficiency context to be relevant in assessing significance. In situations where a supply shortfall exists, it is my view that a smaller additional yield could be considered significant. I come to this view as the overall requirements and importance for Council to return to a supply surplus in both the NPS-UD and s31(aa) ultimately means any contribution to the Council's shortfall constitutes significant development capacity.
- 6.2.9 Council's latest [Greater Christchurch Business Capacity Assessment 2026](#) (BCA) identifies that Christchurch City has sufficient industrial land supply in the short and medium term, however in the long term a sufficiency shortfall is projected. The table below is a copy from the 2026 BCA. It is noted that logistics and warehousing are projected to have a significant long term demand of 746.8ha which means the Council will be required to find large sites to provide for the land use.

Table 1 Industrial Sufficiency in Christchurch City - Greater Christchurch 2026 Business Capacity Assessment

Christchurch City	Short Term Land Requirements	Medium Term Land Requirements	Long Term Land Requirements
Total Demand	64.8	295.2	854.45
Total Supply	526	526	526
Less land that is not serviced	277.22	114.1	114.1
Less land that is not suitable	0.96	0.96	0.96
Sufficiency	346.14	115.74	-443.51

6.2.10 I note Council is required by Policy 2 of the NPS-UD to ensure at least sufficient development capacity is provided to meet expected demand for business land over the short term, medium term, and long term. In the context of this long term shortfall scenario, I consider the additional industrial development capacity proposed by PCC19 to be significant development capacity.

6.2.11 The second limb of Policy 8 concerns whether the development capacity would contribute to a well functioning urban environment. Policy 1 of the NPS-UD outlines the minimum requirements for what constitutes a well functioning urban environment as:

- a. have or enable a variety of homes that:
 - i. meet the needs, in terms of type, price, and location, of different households; and
 - ii. enable Māori to express their cultural traditions and norms; and
- b. have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
- c. have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
- d. support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
- e. support reductions in greenhouse gas emissions; and
- f. are resilient to the likely current and future effects of climate change.

6.2.12 I have provided analysis of how the proposal contributes to a well-functioning urban environment in table 2 below.

Table 2 NPS-UD Well Functioning Urban Environment Analysis

NPS-UD Policy 1 Criteria	Analysis of the proposal's contribution to a WFUE
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a. 'Variety of Housing '	The proposal would result in a loss of residential housing that contributes to a variety of housing. Offsetting the loss is a wide variety of other typologies of housing in Christchurch City which are described in the Greater Christchurch Housing Capacity Assessment .
b. 'Variety of Business land'	The private plan change would provide an additional 24 hectares of industrial land, the industrial zones enable a wide range of business activities, in particular high demand activities such as logistics and warehousing. The additional 24ha would contribute to the future forecasted shortfall of 443ha.
c. 'Good Accessibility'	Yes, adjoins SH1 and has nearby connections to SH76. Bus route no.5 (Rolleston/New Brighton) follows Waterloo Road which has a bus stop within 500m of the request site.
d. 'Support competitive land markets'	Yes, proposal rezoning would contribute to long term sufficiency shortfall
e. 'Support reductions in greenhouse gas emissions'	The rezoning has the potential to support reductions in greenhouse gas emissions by facilitating development within a consolidated urban environment rather than at more remote greenfield locations. The proximity of the site to existing residential areas, employment centres, transport networks and community services can reduce vehicle travel distances and encourage greater use of walking, cycling and public transport
f. 'Resilient to climate change'	Yes, proposal area is not prone to high risk flooding and is inland from the sea.

6.2.13 It is my view that the request would contribute to a well functioning urban environment.

6.2.14 To conclude, the request satisfies the two limbs of Policy 8 which requires Council to be responsive to the request. It is my view that the request gives effect to the wider suite of NPS-UD Objectives and Policies.

6.3 NATIONAL POLICY STATEMENT ON HIGHLY PRODUCTIVE LAND

6.3.1 The objective of the NPS HPL is the protection of highly productive land for use in land-based primary production, The sole objective is supported by policies that outline how HPL is a finite

resource that needs to be managed in an integrated way (Policy 2). The “urban rezoning” of highly productive land (Policy 5) and subdivision (Policy 7) are to be avoided except as provided in the NPS-HPL. 6.3.24 The NPS-HPL was amended by the National Policy Statement for Highly Productive Land Amendment 2025 on 18 December 2025. These amendments related to the timing for when regional councils map highly productive land, expand the quarrying and mineral extraction provisions and remove LUC Class 3 versatile soils as highly productive land. Therefore, the latest amendments are not specifically relevant to PPC19.

Is the request area highly productive land?

- 6.3.2 Clause 3.5(1) of the NPS-HPL outlines that the regional council, the Canterbury Regional Council (CRC), is responsible for mapping highly productive land. At this time, CRC is yet to notify maps identifying highly productive land. Clause 3.5(7) provides direction on an interim identification of highly productive land, the criteria being land that is zoned General Rural or Rural Production that contains LUC Class 1, 2 or 3 soils. Whilst the proposal area is zoned by the CDP as RuUF, the CDP has not been aligned to the National Planning Standards zones of General Rural Zone or Rural Production Zone. At the bottom of Clause 1.3 Implementation it is outlined that for local authorities that have not yet implemented the Zone Framework Standard of the National Planning Standards (NPS), a zone referred to in the NPS HPL is a reference to the nearest equivalent zone. It is noted that the request area contains LUC Class 2 land, thus the test to determine whether the land is highly productive land is whether the RuUF is nearest equivalent to General Rural or Rural Production Zone.
- 6.3.3 Conflicting approaches have emerged in regard of the appropriate method to determine the nearest equivalent zone.
- 6.3.4 The Pound Road Fast Track Decision concluded based on physical characteristics and historical land fragmentation that land-based primary production was significantly constrained and thus the nearest equivalent zone for RuUF was not general rural or rural production zones and thus the NPS-HPL was not applicable.
- 6.3.5 The Ryans Road Fast Track Decision concluded based on the content of the CDP that consistently refer to and seek to maintain rural productive activities occurring in all rural areas that the nearest equivalent zone for RuUF was general rural or rural production zones and thus the NPS-HPL was applicable.
- 6.3.6 To summarise the two approaches, one bases the assessment of nearest equivalent on the land use reality and expertise to come to a ‘most appropriate’ nearest equivalent, akin to a s32 analysis. The alternative is an evaluation of operative District Plan content and aligning the content with the descriptions of the NPS General Rural and Rural Production Zones. The contention is a matter of method rather than merits.

6.3.7 Referring to case law on this matter, the Environment Court in *Drinnan v Selwyn District Council* [2023] outlines in para 82 and 86 the following points on evaluation methods.

[82] Deciding which of the zones is the 'nearest equivalent zone' does not involve an evaluation of the extent of rural land use activities taking place within the relevant zone. This approach risks the court inadvertently making new policy rather than interpreting the same. We are reinforced in this view by the MfE guidance on interpreting cl 3.5(7) that notes the assessment is undertaken by referring to the zone description, objectives, policies, activity table and subdivision provisions (in the round).

[86] We do not, however, consider reliance on reports prepared under ss 32 and 42A or evidence given by the District Council employees in unrelated hearings to be a permissible guide to interpretation, and we give no weight to interpretations that sought support from the same.

6.3.8 My view on this matter is that the method to establishing the nearest equivalent zone is outlined in the NPS itself. Mandatory direction 8(2) of the NPS Zone Framework Standard outlines that if an existing zone in a plan is consistent with the description of a zone in table 13 of the standard, that existing zone must use that zone name in table 13. Following the mandatory direction, the task of working out the nearest equivalent zone is to evaluate the existing plan content with the descriptions provided in the NPS. This approach is consistent with the Drinnan decision in that the nearest equivalent zone assessment does not involve an evaluation of the activities taking place in the zone or previous s32 intent.

6.3.9 To summarise, the task is to evaluate the existing content of Chapter 17 Rural and the RuUF against the General Rural and Rural Production Zone descriptions provided in the NPS, if the existing content aligns with either of the NPS's zone descriptions, then the NPS HPL applies.

6.3.10 I don't believe analysis of any other zone descriptions is necessary as that is ultimately not relevant to the application of the NPS HPL in this private plan change. For example, the consideration of the RuUF as nearest equivalent to Rural Lifestyle Zone, Settlement Zone or Low Density Residential Zone.

6.3.11 Considering the operative CDP content, Chapter 17 is constructed in a way that features one objective across seven rural zones. Objective 17.2.1.1 notes that subdivision, use and development of rural shall:

- *Support, maintain and, where appropriate, enhance the function, character and amenity values of the rural environment and, in particular, the potential contribution of rural productive activities to the economy and wellbeing of the Christchurch District;*
- *avoids significant, and remedies or mitigates other reverse sensitivity effects on rural productive activities and natural hazard mitigation works;*
- *maintains a contrast to the urban environment; and*

- *maintains and enhances the distinctive character and amenity values of Banks Peninsula and the Port Hills, including indigenous biodiversity, Ngāi Tahu cultural values, open space, natural features and landscapes, and coastal environment values.*

- 6.3.12 It is my view that a fair summary of the objective would be to support landscape and economic use of the rural environment along with maintaining a contrast to the urban environment.
- 6.3.13 Chapter 17 has only one policy which 17.2.24 establishes a baseline of anticipated land use outcomes in the CDP's individual rural zones. In regard to RuUF the closest mention to a land use outcome can be gathered from 17.2.24(a)(ii) that outlines that the District Plan seeks to ensure the nature, scale and intensity of subdivision, use and development recognises the rural productive activities and recreation activities in the rural flat land area surrounding the main Christchurch urban area.
- 6.3.14 I consider Policy 17.2.2.7 is relevant in that it outlines the anticipated density and distribution of residential units in rural zones. The policy is directive in that the density and distribution of residential units shall maintain and enhance the working function of the rural environment, and to avoid the expectation of land use change from rural to urban activities or rural residential development. Subdivision is worth consideration as the individual rural zones have different subdivision minimum lot sizes; it is my view that this is an appropriate response to the different land uses and landscape values across Christchurch's rural environment. The RuUF has a minimum lot size of 4ha, meanwhile the Port Hills Rural Zone has a minimum of 100ha which reflects the landscape values and outstanding natural landscape overlays that are applicable to the hills and Banks Peninsula.
- 6.3.15 The land use provisions across the rural zones are near identical with only the Quarry and Templeton (Land Use specific zones), and Waimakariri Rural (Flooding) being outliers. The RuUF enables a wide range of activities, this includes traditional agriculture/pastoralism to small scale rural vets, home-occupations and residential. The broad range of activities in the RuUF is however not dissimilar to other Chapter 17 Rural Zones. For example, the only difference between RuUF and Rural Banks Peninsula (RuBP) permitted activities is that RuBP specifically permits helicopter landing and aquaculture activity, while the RuUF specifically allows for poultry hatcheries. My view is that despite activity differences among the Chapter 17 Rural Zones, the RuUF is best summarised as a zone that predominantly enables rural activities.
- 6.3.16 Overall, I would summarise that the objectives, policies, and rules of Chapter 17 anticipates a productive environment for pastoral, agricultural, and quarry land uses with associated landscape values of openness and a stark contrast to urban.
- 6.3.17 Turning to the NPS zone descriptions.

The General Rural Zone is described as: “Areas used predominantly for primary production activities, including intensive indoor primary production. The zone may also be used for a range of activities that support primary production activities, including associated rural industry, and other activities that require a rural location”.

The Rural Production Zone is described as “Areas used predominantly for primary production activities that rely on the productive nature of the land and intensive indoor primary production. They may also be used for a range of activities that support primary production, including associated rural industry, and other activities that require a rural location.”

- 6.3.18 Evaluating the two descriptions against my summation of the CDP content that the RuUF prioritises productive rural land uses, I consider that there is broad alignment between the content of CDP and both the Rural Production and General Rural Zone descriptions. I conclude that RuUF is nearest equivalent to the Rural Production and General Rural Zone, thus the NPS HPL is applicable.

Can the Council approve the rezoning of Highly Productive Land?

- 6.3.19 In the first instance Policy 6 of the NPS-HPL outlines that the urban rezoning of highly productive land is avoided except for as enabled by the NPS-HPL. The criteria for rezoning are listed in Clause 3.6 of the NPS-HPL.
- 6.3.20 NPS-HPL clause 3.6(1) outlines that territorial authorities may only allow the urban rezoning of highly productive land where:
- a. The rezoning is required to provide sufficient development capacity (under the NPS-UD); and
 - b. There are no other reasonably practicable or feasible options to achieve a “well-functioning urban environment” within the same locality and market; and
 - c. The benefits outweigh the costs associated with the loss of highly productive land.
- 6.3.21 Considering Clause 3.6(1)(a), I have noted the long-term industrial sufficiency shortfall in section 6.2 above, I consider the rezoning satisfies this clause.
- 6.3.22 Considering Clause 3.6(1)(b), I note that Christchurch City is surrounded by LUC Class 1 and 2 land and as such there are no other reasonably practicable options for urban expansion that would avoid the rezoning of highly productive land.
- 6.3.23 The cost benefit criteria of Clause 3.6(1)(c) is covered by the combined reporting of MacFarlane Rural and Property Economics. Mr Everest’s reporting covers the long term constraints that restrict productivity for the request area. The MacFarlane Rural report concluded that the area is currently economically unviable as a land based primary producing unit and will continue to remain economically unviable in the long term given the constraints of water resource availability. The

report noted that none of the assessed farm or horticultural land uses considered deliver an adequate return to be defined as economically viable. I consider that any potential adverse environmental, economic, social and cultural effects on the productive land resource are minimal when considering the potential environmental/economic costs required to create a viable land-based production unit on the land. The economic and social benefits that could arise from co-location agglomeration and enduring employment are noted in the Property Economics report provided with the application. Overall, I consider the criteria of 3.6(1)(c) is met by the request.

- 6.3.24 In regard to Clause 3.6(5) that Council is must take measures to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment. Christchurch City has a large amount of LUC 1, 2 and 3 land as shown in figure 2 below. Any greenfield expansion would involve highly productive land in Christchurch City. Land that isn't identified as HPL in figure 2 is utilised for other 'permanent' land uses such as Christchurch Prison, Ruapuna raceway, quarries, or urban area. I am satisfied that the spatial extent is the minimum necessary to provide required development capacity.

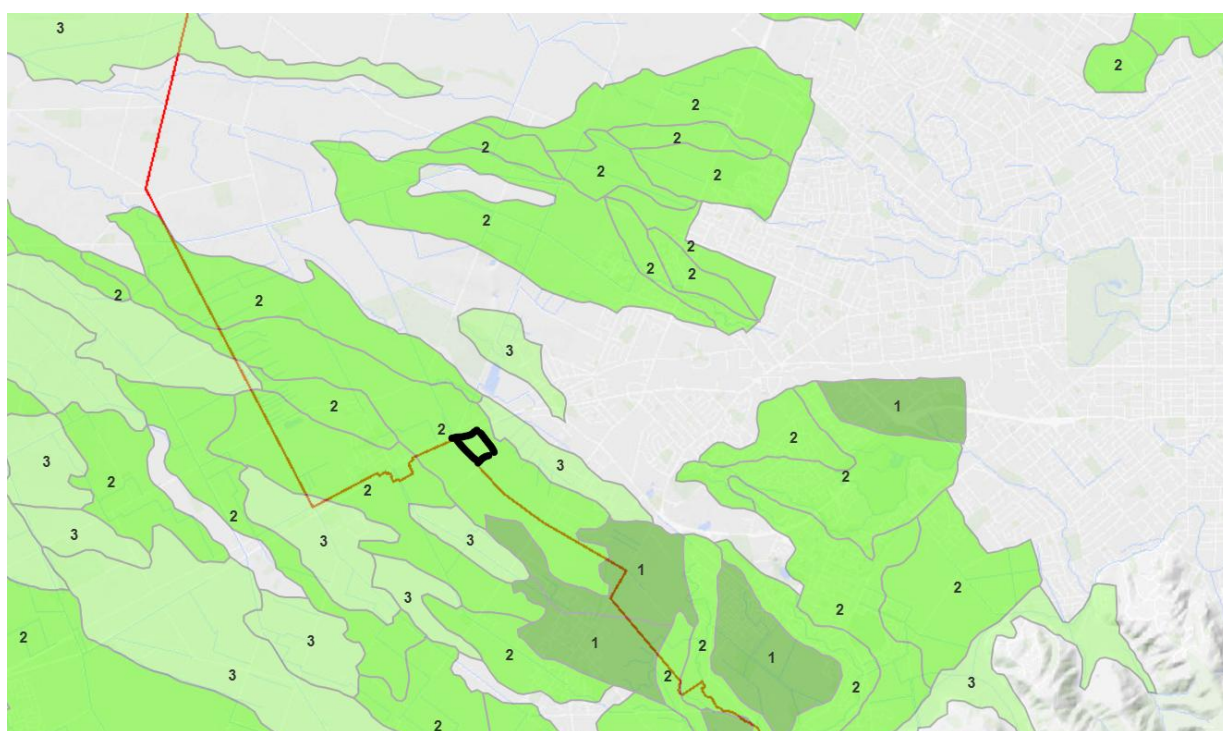


Figure 2 HPL Map for South - West Christchurch. PPC19 identified as a black square

- 6.3.25 To conclude, the request satisfies the criteria in the NPS-HPL which may allow Council to rezone PPC19 from a rural to urban zone.

6.4 NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT

- 6.4.1 The NPS-FM provides national directions that ensure that natural and physical resources are managed in a way that prioritises the health and well-being of water bodies and freshwater

ecosystems, the health needs of people and the ability of people and communities to provide for their current and future wellbeing (Objective 1). The NPS FM introduces the concept of Te Mana o te Wai to reflect the need for land and water to be managed in an integrated way (clause 1.3).

- 6.4.2 As discussed in Mr Norton's evidence Council is required to provide a range of appropriate mitigation measures to ensure compliance with the Huritini-Halswell Stormwater Management Plan (CCC, 2025) and Comprehensive Stormwater Network Discharge Consent (CSNDC) CRC252424. The management plan and comprehensive consent ensure that development in Christchurch City mitigates any actual or potential adverse effects on groundwater and ultimately freshwater management. I consider the proposal is consistent with the NPS-FM.

6.5 NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

- 6.5.1 The NPS-IB recognises the importance of maintaining indigenous biodiversity and the significant role it plays in supporting ecological integrity, as well as social, economic, and cultural wellbeing (Objective 1). It requires local authorities to identify and protect significant indigenous vegetation and significant habitats of indigenous fauna (Objective 2), and to maintain indigenous biodiversity across New Zealand (Objective 3). Decision-makers must avoid adverse effects on significant biodiversity and manage other adverse effects to ensure overall maintenance of indigenous biodiversity (Policies 3–5). The NPS-IB requires the restoration and enhancement of indigenous biodiversity where practicable (Policy 6), and the consideration of the effects of activities and land use change on biodiversity values (Policy 8).
- 6.5.2 The site is not known to contain significant indigenous biodiversity values and does not contain any Sites of Ecological Significance mapped in the Christchurch District Plan. As the proposal is unlikely to adversely affect indigenous biodiversity values, it is considered to give rise to any issues relevant to the NPS-IB.

6.6 NATIONAL ENVIRONMENTAL STANDARD FOR ASSESSING AND MANAGING CONTAMINANTS IN SOIL TO PROTECT HUMAN HEALTH

- 6.6.1 As this is a request for a zone change, and not to determine the actual use of the site, the NESCS does not strictly apply. The requirements of the NESCS will have to be appropriately addressed at any subsequent subdivision or building consent stage and may either satisfy the permitted activity requirements or require resource consent under the NESCS.
- 6.6.2 I consider that any risk of developing the land for industrial purposes to people's health can be effectively managed under the NESCS.

6.7 CANTERBURY REGIONAL POLICY STATEMENT

- 6.7.1 The Canterbury Regional Policy Statement provides an overview of the resource management issues in the Canterbury region, and the objectives, policies and methods to achieve integrated management of natural and physical resources. These methods include directions for provisions in district plans.
- 6.7.2 Chapter 6 sets up a framework which identifies areas for urban development within Greater Christchurch. This is defined and illustrated spatially on Map A – Greenfield Priority Areas. The request area is located outside Map A and thus is inconsistent with the direction of the CRPS. However, as discussed in section 6.2, I consider the proposal is significant development capacity and thus the Council must be responsive to the request despite the direction of the CRPS. I consider that PPC18 is generally consistent with the urban form objectives and policies of the CRPS other than Map A, however, I give greater weighting to the specifics of the national direction around urban environments.

6.8 GREATER CHRISTCHURCH SPATIAL PLAN

- 6.8.1 The GCSP is a strategy prepared under the Local Government Act that sets out the desired urban form for the sub-region for the next 30 years. It is the Future Development Strategy (FDS) for Ōtautahi Christchurch, and the Selwyn and Waimakariri districts under the NPS-UD. The GCSP covers three themes and six opportunities.
- 6.8.2 Opportunity 5 is relevant to this request as it outlines to “provide space for businesses and the economy to prosper”, as is Direction 5.1 to provide “sufficient land is provided for commercial and industrial uses well integrated with transport links and the centres network”. The GCSP outlines that industrial land is “often located close to freight routes and usually separated from housing.” The GCSP does not identify new industrial areas, mainly due to a surplus of supply being forecasted at time of publishing. Overall, I consider the request has regard to the GCSP by enabling additional business land that will unlock more employment in Christchurch City.

6.9 MAHAANUI IWI MANAGEMENT PLAN 2013

- 6.9.1 Appendix K to the request covers the Mahaanui Iwi Management Plan and contains recommendations for future development and resource consent applications should the request be approved. I agree with these recommendations as they give effect to the iwi management plan. The recommendations from Mahannui report note that stormwater runoff, earthworks, shallow groundwater depth and new contaminated land development are primary concerns that require mitigation. Mahaanui outline that Stormwater should be treated, by a minimum of a first flush treatment which is proposed in PPC19, and that any earthworks above shallow groundwater should be avoided. Mr Norton’s evidence outlined that the groundwater in this location is relatively deep so this concern should be mitigated and Council’s standard in this area of the City is to require

a first flush treatment before discharge. I agree with the recommendations of the Mahaanui report and believe the outlined concerns can be mitigated by the existing provisions of the CDP.

7 ANALYSIS AND EVALUATION OF SUBMISSIONS

7.1 OVERVIEW OF SUBMISSIONS AND FURTHER SUBMISSIONS

- 7.1.1 The plan change was notified on 21 November 2025, with submissions closing on 19 December 2025 and further submissions closing on 24 April 2026. The Council received twenty-six submissions, these attracted one further submission. A copy of the submissions and further submissions received can be viewed on the [Council website](#).
- 7.1.2 Twenty two submissions seek that the Private Plan Change is declined. Four more submissions are neutral to the request and seek certain concerns be addressed. One further submission was received supporting submissions that sought the request be declined. The points made and decisions sought in submissions and further submissions will be considered in the following sections of this report.

7.2 ANALYSIS OF SUBMISSIONS

- 7.2.1 The following analysis addresses both the effects on the environment of the plan change and the appropriateness of the plan change request in terms of the relevant national, regional and district plan objectives, policies and standards. Where amendments to the plan change are recommended, I have specifically considered the obligations arising under section 32AA (**s32AA**)
- 7.2.2 My recommendation on each submission and a summary of reasons are provided in **Appendix 1 – Table of Submissions with Recommendations and Reasons**, attached to this report.
- 7.2.3 As a result of consideration of submissions, I recommend some amendments to the District Plan provisions. In this report, the CDP text is shown as *normal text in italics*.. Any text recommended to be added by this report will be shown as **red bold** text in italics and that to be deleted as ~~**red bold-strikethrough**~~ text in italics.

7.3 INCOMPATIBLE ACTIVITIES

- 7.3.1 Residents of the Frontage Properties have raised concerns with the request to rezone the wider area and their individual properties to industrial. The primary concerns being the impact of industrial activities on submitters quality of life, and enjoyment of their private property, the setback of industrial buildings from their properties; and the economic impact on their properties.
- 7.3.2 Objective 3.3.15 of the CDP strategic directions outlines that activities and ultimately zones should not be incompatible neighbours, directing that “...The location of activities is controlled, primarily

by zoning, to minimise conflicts between incompatible activities; and conflicts between incompatible activities are avoided where there may be significant adverse effects on the health, safety and amenity of people and communities.” This objective is of particular relevance to this request, given the potential for the requested zoning to create incompatibility between land uses. Specifically, the second limb of the objective directs to avoid land use conflicts that generate significant adverse effects, and as I will discuss further, the Industrial Heavy Zone can produce significant adverse effects due to the nature of the permitted Heavy Industrial Activities.

7.3.3 There are three industrial zones in the CDP, Industrial General, Industrial Heavy and Industrial Park, each zone provides for a different function and reflects the potential adverse effects of land use permitted in each zone. The District Plan in Policy 16.2.1.3(a) provides a summary of what each zone is intended for:

- *Industrial General Zone - Recognise and provide for industrial and other compatible activities that can operate in close proximity to more sensitive zones due to the nature and limited effects of activities including noise, odour, and traffic, providing a buffer between residential areas and the Industrial Heavy Zone.*
- *Industrial Heavy Zone - Recognise and provide for a full range of industrial and other compatible activities that generate potentially significant effects, including relatively high levels of noise, odour, heavy traffic movements, and the presence of significant amounts of hazardous substances, necessitating separation from more sensitive activities.*
- *Industrial Park Zone - Recognise and provide for industrial activities in the high technology sector and other industries in a high amenity environment dominated by open space and landscaping, and that generate higher volumes of traffic than other industries while having negligible effects in terms of noise, odour or the use and storage of hazardous substances.*

7.3.4 The descriptions in Policy 16.2.1.3(a) are reflected in the rule frameworks for each zone. Industrial Heavy and Industrial General have near identical rule standards focused on mitigating the potential adverse effects of industrial activity. Some examples of identical provisions are landscaping, building height is restricted to 15m within 20m of a boundary and then unlimited building heights. Setbacks from sensitive activities are 3m under both zones.

7.3.5 The Industrial General Zone permits a wide range of industrial activity, manufacturing, fabricating, processing, repairing, assembly, packaging, wholesaling or storage of products, ancillary retail, warehousing and logistics, and yard-based suppliers. While general industrial zone activities have the potential to produce nuisance effects, these effects are mitigated via general rules of the CDP

that manage (in accordance with Policy 16.2.1.3(a)) noise, hours of operation, lighting, traffic movements, landscaping and setbacks.

7.3.6 The Industrial Heavy Zone as described in Policy 16.2.1.3(a) has a different function to the other industrial zones in terms of activities enabled in the zone. The key difference is the permitted activity status of 'Heavy Industrial Activity, which is defined as:

- a. blood or offal treating; bone boiling or crushing; dag crushing; fellmongering; fish cleaning or curing; gut scraping and treating; and tallow melting;
- b. flax pulping; flock manufacture or teasing of textile materials for any purpose; and wood pulping;
- c. storage and disposal of sewage, septic tank sludge or refuse;
- d. slaughtering of animals; storage, drying or preserving of bones, hides, hoofs or skins; tanning; and wool scouring;
- e. the burning of waste oil in the open air or in any combustion processes involving fuel-burning equipment;
- f. any other processes involving fuel-burning equipment, which individually or in combination with other equipment, have a fuel-burning rate of up to 1000 kg/hr;
- g. the open burning of coated or covered metal cable or wire, including metal coated or covered with varnish, lacquers, plastic or rubber;
- h. any activity with the potential to discharge asbestos to air, including the removal or disposal of friable asbestos, except where it complies with the Health and Safety in Employment (Asbestos) Regulations 1998 and is supervised and monitored by Occupational Safety and Health staff;
- i. burning out of the residual content of metal containers used for the transport or storage of chemicals;
- j. the burning of municipal, commercial or industrial wastes, whether by open fire or the use of incinerators for disposal of waste;
- k. any industrial wood pulp process in which wood or other cellulose material is cooked with chemical solutions to dissolve lining, and the associated processes of bleaching and chemical and by-product recovery; and
- l. crematoriums and embalming services.

7.3.7 In summary Industrial Heavy enables activity that requires separation from sensitive activities, Industrial General Zone is recognised by the CDP direction to be utilised as buffer between sensitive areas and heavy industry. Alternatively, the Industrial Park being for high technology sector and other industry, which is expected to have reduced adverse effects on sensitive activities.

- 7.3.8 Considering Heavy Industrial Activities alongside residential living as currently experienced by the Frontage Properties, my view is that they are not compatible land uses. The activities permitted by Industrial Heavy Zone have the potential to produce high levels of noise, odour, heavy traffic movements, and the presence of significant amounts of hazardous substances (see CDP 16.2.1.3(a)). The CDP notes that the Industrial Heavy Zone requires separation from more sensitive activities and that Industrial General, is more appropriate for proximity to residential land use as any actual or potential adverse effects can be mitigated.
- 7.3.9 My assessment of the appropriateness of the proposed zoning continues across the following sections, concluding with a recommended alternative approach supported by a s32AA.

7.4 ECONOMIC EFFECTS

- 7.4.1 I will first address the broader economic effects, before turning the focus of my discussion to the existing residential properties. An economic study was prepared by Property Economics Limited to inform the plan change. This assessment considered the potential economic costs and benefits of the proposed rezoning. The report considers the principal benefit that would arise from the rezoning would be the continued positive agglomeration effects of industrial activities clustering together in the Hornby area.
- 7.4.2 The costs identified are the potential to undermine existing zoned vacant industrial land capacity and adverse environmental effects. Property Economics note that the potential undermining of capacity is likely to be small given the quantum of vacant industrial land relative to the projected demand Christchurch wide. It is explained that the level of vacancy is already at the point in which development is likely to be dispersed. The addition of the subject site is unlikely to create any noteworthy additional inefficiencies around the timeline for the development of other industrial areas. The proposal is also located in an area of existing infrastructure, albeit constrained, and thus is an effective use of existing infrastructure capacity. Overall, the report considers the economic benefits outweigh any potential economic costs arising from rezoning.
- 7.4.3 A rural economics report was prepared by Mark Everest of Macfarlane Rural to consider the potential economic cost of the request area no longer being available for land-based production. The report concluded that the area is currently economically unviable as a land based primary producing unit and will continue to remain economically unviable in the long term given the constraints of water resource availability. The report concludes that none of the assessed farm or horticultural land uses considered deliver an adequate return to be defined as economically viable. I have relied upon the conclusions of this report in relation to the criteria of NPS-HPL clause 3.6, see section 6.3 of this report.
- 7.4.4 Of the 26 submissions 22 are opposed to the proposed rezoning, in part due to the potential economic costs to their home values and rates increases from rezoning from Rural Urban Fringe to

Industrial Heavy Zone as proposed. Additional concerns relate to the potential for environmental effects such as noise, visual effects of new industrial buildings, odour, dust, and traffic. Submitters are also concerned about the uncertainty of residing in homes that are zoned industrial and the effect this may have on the enablement of uses permitted under the Rural Urban Fringe Zone activities, such as accessory buildings or extensions to their existing residential dwellings.

- 7.4.5 No economic assessment on the actual or potential economic benefits or costs on the Frontage Properties has been provided by the applicant. I agree with submitters that the proposed IH zoning has the potential to significantly impact the value and liveability of their homes. The following sections of my report discuss the other potential effects on the Frontage Properties, however I recommend the applicant address the gap in the economic assessment through their evidence to ensure a fulsome evaluation of the proposal.
- 7.4.6 In regard to the potential impact on property rates, I refer to the 2026/2027 Rating policy. Page 8 includes information on the differentials of general rates and how rates are applied to land use. The general rate is applied to four categories, standard, business, city vacant and remote rural. Remote rural is defined as 20ha or greater and located outside available servicing so not applicable to the Frontage properties. Neither is city vacant as that is applicable to vacant sites in the Central City. Any rating unit which used for residential purposes continues to have the standard rate applied, thus would be applicable to the frontage properties currently. Business rates are applicable to any rating unit which is land zoned Commercial or Industrial in the District Plan, situated anywhere in the District, except where the principal use is residential. Therefore, in the case rezoning was approved for the frontage properties and the principal use remained residential, the standard rate would apply.
- 7.4.7 The existing land uses of the Frontage Properties are residential, and it is anticipated by the s32 that the Frontage Properties will simply be absorbed into the wider industrial area eventually. However, throughout an undefined period of time the frontage properties will remain occupied and used as residential dwellings under existing use rights. However, the existing residential uses will not be enabled by the District Plan, and any proposal to add an accessory building or residential extension would default to a non-complying activity status in any of the Industrial Zones. I note that the general noise provisions that mitigate effects between rural and industrial would no longer be applicable as they apply control based on the receiving zone. My view is that this is not the most appropriate planning framework for the existing land uses of the Frontage Properties.
- 7.4.8 The Frontage Properties are not owned by the proponent of the PPC19 request. My understanding of the proponent's position is that no sale and purchase agreements with the Frontage Properties have been agreed, nor is the proponent actively interested in acquiring the Frontage Properties in the short or medium term. Further, submissions provided by residents do not support their properties being included in the rezoning request. In my view the s32 evaluation is limited on the benefits and costs to the Frontage Properties

- 7.4.9 Considering the ownership, submissions opposing rezoning, and limited evaluation on the costs and benefits of rezoning the frontage properties to those submitters, I consider further s32 evaluation is required to justify the rezoning of the Frontage Properties from Rural Urban Fringe Zone to Heavy Industrial Zone. My recommendation at this time is that the Frontage Properties remain Rural Urban Fringe Zone at this time. Should property ownership change in the future and provide an opportunity to address potential incompatibility issues, I consider there may be merit in rezoning the entire request area as it would avoid creating interfaces between residential and industrial land uses.

7.5 BUILDING SETBACKS

- 7.5.1 The request has provided a landscape and visual assessment of the private plan change area that covers any actual or potential adverse effects. The landscape assessment was authored by Paul Smith Senior Landscape Architect of Rough Milne Mitchell Landscape Architects. The assessment identifies a range of potential adverse visual effects ranging from very low to moderate-high. Mr Smith considered potential landscape effects will have a low to low-moderate degree of adverse effects on the landscape values of the frontage properties. Regarding visual effects, the assessment identified that moderate-high potential adverse visual effects would be experienced by the residential properties within and adjacent to the request area. The report also notes that these potential adverse effects will be greater on any residents that remain residing in their properties if the rezoning and industrial development occurred.
- 7.5.2 The request relies upon a setback provision within the IH zone standards to manage potential adverse visual effects, but with an amendment to only apply from Frontage Properties for a duration of 10 years. Submitters are concerned that the proposed building setback of 20m from the boundary of the Frontage Properties is insufficient to mitigate adverse effects.
- 7.5.3 Chapter 16 Industrial in Policy 16.2.3.1 outlines that development of new industrial areas must manage effects at the interface between industrial and rural and residential areas through setbacks and landscaping. Industrial buildings have the potential to contain large structures that can visually dominate the adjoining environment, especially sensitive land uses such as residential homes. I recognise building setbacks as an appropriate method to manage industrial-residential interfaces, specifically the visual impact of large-scale buildings. Setbacks together with substantive landscaping strips and requirements for large scale tree and hedge plantings, can screen industrial development and reduce adverse amenity effects to an acceptable level.
- 7.5.4 The degree of separation required to mitigate effects varies within the Industrial Chapter The standard building setback for both Industrial Heavy and Industrial General zones from residential zones is 3m. The operative South-West Hornby ODP has specific setbacks for rural and residential activities, being 10m for rural, and 20m for residential activities. Relevant in my view is the setbacks used in the Trents Road ODP 16.8.6 and associated rule provisions in 16.4.8. Trents Road. This being

a similar development scenario as PPC19 with an interface between industrial and residential. Trents Road ODP is approx. 1km away from PPC19, however is zoned Industrial General rather than Industrial Heavy as proposed by PPC19. I have included the Trents Road ODP below in Figure 2 to show the similar scenario of residential land use fronting Main South Road and Industrial zone to the rear.

- 7.5.5 In the Trents Road case a greater building setback of 25m has been applied, along with a minimum of 10% of the site shall be site aside as a landscaped area and landscape strips adjoining boundaries in 16.4.8.2.2. This provides for greater opportunity for large scale tree planting (tree canopy) and reducing visual dominance of any large industrial buildings.

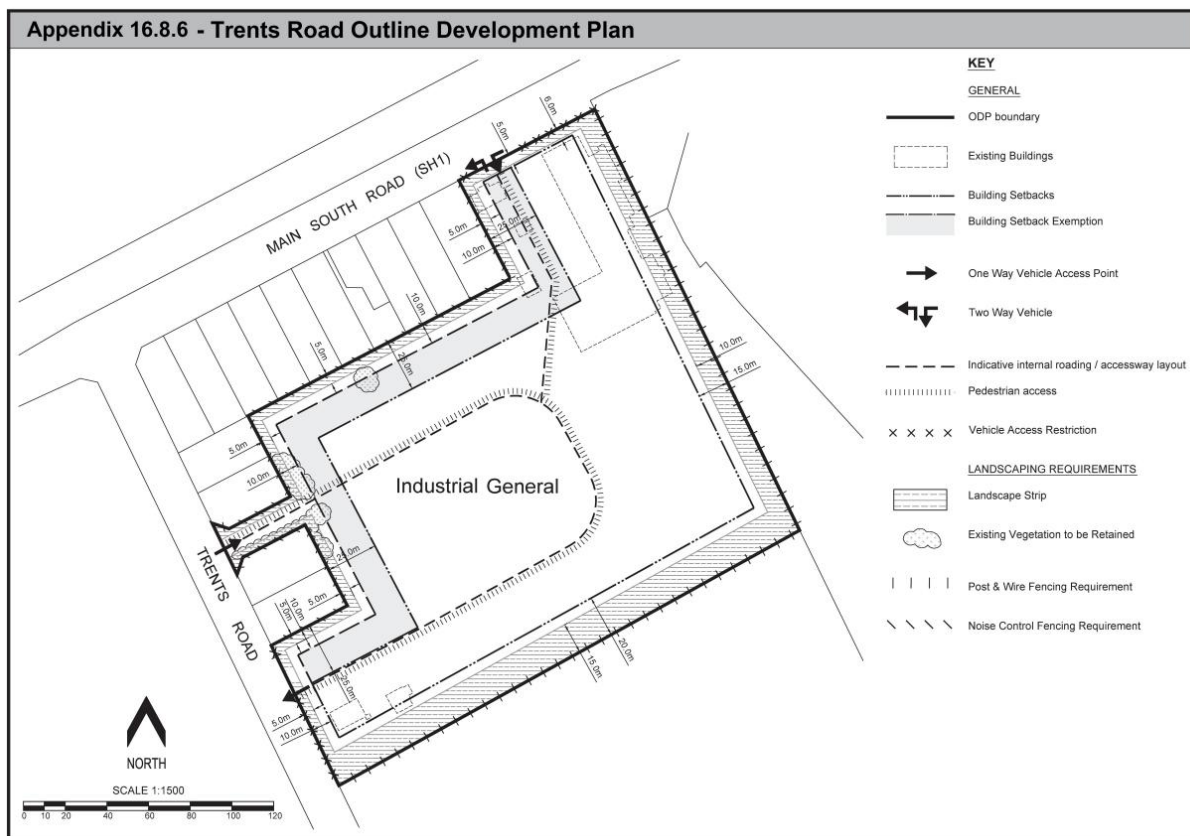


Figure 3 Trents Road ODP with 25m setback

- 7.5.6 Mr Smith for the request provided a response via RFI, that “...the proposed 20m setback aligned with the District Plan’s standards, provided ample space for landscaping, and ensured that shading of neighbouring properties from future development along Main South Road will not occur, and is unlikely to occur along Marshs Road.” I accept the conclusions that 20m provides ample space for landscaping but prefer the existing CDP approach in the Trents Road ODP of 25m as the most appropriate method to reduce adverse amenity effects of large industrial structures to an acceptable level.
- 7.5.7 It is my view that the building setback should be in place for perpetuity. In future should the properties be purchased by the applicant with the purpose of development for industrial purposes,

then the setback can be re-evaluated at that time via resource consent based on the specifics of the land use proposal. The specifics of the land use activity may deem the building setback unnecessary to mitigate impacts on rural and/or residential properties

7.5.8 I disagree with the certainty that neighbouring property would not be shaded by buildings in the landscape RFI. The General and Heavy industrial zones have unlimited height from within 20m of a boundary, so some degree of shading is theoretically possible. Modelling has not been provided to confirm any or potential impacts of shading, and in the absence of this to demonstrate with more certainty no adverse effects will arise, I consider a greater setback to be appropriate.

7.5.9 To conclude, I accept a setback is an appropriate method to mitigate effects of industrial use, however my view is that a building setback of 25m (adopting the setbacks used in the Trents Road ODP) is more appropriate than 20m to mitigate adverse effects. A s32AA is included below to support my recommendation. Submissions regarding a building setback being an inappropriate mitigation are recommended to be rejected, submissions seeking a greater setback are recommended to be accepted.

Proposed amendments to PPC19	Effects and evaluation of changes
The minimum building setback from a boundary with a rural zone and from residential properties shall be as follows: A setback of 25m ~~(A) A site adjoining an existing residential property fronting SHNo1 (South) and Marshes Road (North) until the existing residential activity ceases following which no setback shall apply.~~ ~~(B) B. Clause (iii) shall only apply until 1st January 2036. (Refer Outline Development Plan Appendix 16.8.8 (i) and (ii))~~	The effects of the recommended change. Benefits Adopting an existing CDP approach in the <u>Trents Road ODP</u> of 25m to mitigate any actual or potential adverse effects which are noted as potentially being medium to high impact on residential property, 25m would provide mitigation while not excessively restricting industrial activity on the site. A certainty of the building setback existing for perpetuity like other setbacks across the City rather than 10 years as proposed by the request. A greater setback reduces the potential of shading. Potential social benefits to Frontage Properties with a degree of amenity maintained. Costs Economic cost to landowners with less land being developable.

7.6 LANDSCAPING, SCREENING AND NOISE FROM SELWYN DISTRICT

7.6.1 Selwyn District Council submitted on PPC19 expressing concern that regarding the Marshes Road frontage noting that the frontage consists of a deciduous hedge or residential landscaping, offering limited screening, particularly for residential properties on the Selwyn side. SDC considers the Operative CDP 16.5.4.2.4 is insufficient to adequately screen industrial activities.

7.6.2 I note that CDP provisions in chapter 16.5.4.2.4 were introduced in the District Plan Review and since the development of Marshs Road has not progressed (except for one property) the landscaping provision is yet to be implemented. 16.5.4.2.4 requires the following landscaping once development does progress;

- a. Two rows of trees, staggered in a manner that one row is off-set from the other row.
- b. Trees shall be spaced 10 metres apart in each row.
- c. The trees used in the landscaping strip shall comprise one or more of the following species: Podocarpus totara – totara, Hoheria angustifolia – houhere/ narrow-leaved lacebark, Plagianthus regius – manatu/ lowland ribbonwood.
- d. The existing shelterbelt on the Marshs Road frontage shall be retained until trees required under clause ii. are 6 metres in height.
- e. Shrubs shall be planted between the two rows of trees, using the species listed in Appendix 6.11.6 of Chapter 6, Section 3.
- f. The requirements of Appendix 6.11.6 of Chapter 6, Part A shall apply.
- g. Maintenance of the landscaping strip shall be undertaken for a period of no less than 5 years from the date of planting.

7.6.3 The CDP includes matters of discretion in 16.7.3.9.1(b) and 16.7.3.9.3 that specifically give discretion to Council to consider the extent to which landscaping (planting and maintenance) enhances the visual amenity of the site and in particular the urban-rural edge at Marshs Road. Overall, I consider the operative landscaping to be robust and the most appropriate method to mitigate any visual effects.

7.6.4 SDC raises concerns with the Industrial Heavy Zone noise standards, suggesting the noise levels are designed for within-zone receivers. This is not correct as Rule 6.1.5.2.1 is designed to cater for the receiving zone. This is outlined in rule 6.1.5.2.1 (a) of the CDP that any activity that generates noise shall meet the zone noise limits at any site receiving noise from that activity, as relevant to the zone of the site receiving the noise. Thus, noise generated at the edge of the proposed heavy industrial zone will be required to meet rural noise levels.

7.6.5 Overall, my recommendation is to reject the submission points of SDC concerning these matters.

7.7 TRANSPORT EFFECTS

7.7.1 An Integrated Transport Assessment (ITA) was carried out for the applicant by Mr Leckie of Stantec. The ITA concludes that the request would facilitate the completion of a road connection (new Minor Arterial road) between Shands Road and SH1 achieving a more connected road network across the wider area. Stantec's traffic modelling indicates that there will be improvements in the

performance of the wider road network resulting from the improved connectivity. There will be benefits from a reduced use of Marshs Road between Shands Road and SH1, given safety concerns at the SH1 intersection and the formation of the existing rural road. The Stantec report concludes that development enabled by the proposed Plan Change and the minor arterial road connection to SH1 will not give rise to any transport related issues that justify any additional provisions or rejection of the proposed zone change.

- 7.7.2 Mr Chen - Transport Network Planner - has reviewed the request on behalf of the Council and agrees with the majority of the Stantec ITA. Mr Chen's only area of concern is related to the impact of the proposal on the road network prior to the SH1 connection becoming operational. Mr Chen seeks a planning control that enables Council to manage development during the interim network condition. My view on this matter can be mitigated by the existing matters of discretion in CDP Chapter 16 that are relevant when consider subdivision and land use consents in the ODP area, overall, he supports PPC19 from a transport perspective.
- 7.7.3 Submitters have raised concerns regarding additional traffic, heavy vehicles, congestion and safety on Marshs Road, the State Highway 1/Marshs Road intersection, road condition, and uncertainty regarding delivery of the future Minor Arterial connection to State Highway 1. Mr Chen's view is that any potential adverse effects on Marshs Road and the State Highway network can be mitigated through the future Minor Arterial connection to State Highway 1. His evidence notes the operative District Plan restriction on industrial land use access onto Marshs Road mitigates any potential effects arising from this private plan change. However, he does agree with submitters that reducing long-term reliance on Marshs Road for industrial traffic is a desirable transport outcome.
- 7.7.4 Mr Chen and submitters no.2 Lynn Cottam and Grant Hamilton have concerns regarding the timing of the Future Minor Arterial Connection to SH1. The submitters concerns were regarding the uncertainty of their home which in conceptual drawings drafted by the request shows their front gardens being included in the intersection of the new road connection. I have raised this with the applicant twice and yet to receive a response confirming the specifics of the road connection and if the submitters property may be included. Mr Chen raises the potential for adverse effects to arise if development proceeded without the connection or a mechanism to assess network overcapacity in the absence of the connection. I agree with Mr Chen and highlight the matter of discretion 16.7.3.9.4 provides an adequate mechanism to consider any adverse effects during subsequent subdivision or resource consent applications if the future minor arterial connection takes time to form.
- 7.7.5 A number of submitters are concerned with the traffic on State Highway 1. New Zealand Transport Agency - Waka Kotahi provided a submission regarding transport effects on the state highway network but subsequently provided a change of position letter to the Council. The letter outlined that NZTA has reviewed further modelling undertaken by the applicant that quantifies how much additional traffic through this intersection could result from development of the PPC19 site and

that any increase of traffic is likely to be minimal. NZTA's Safety engineer has confirmed that they are subsequently satisfied that the further assessment clarifies that the intersection is unlikely to experience a material change in the efficiency and safety of the existing SH1/ Marshs Road intersection. Accordingly, NZTA considers that the concerns related to the state highway have been suitably addressed. Therefore, NZTA retains its neutral position and no longer wishes to be heard at a Hearing."

- 7.7.6 Overall, I recommend that the submissions related to potential transport effects are either accepted in part or rejected.

7.8 WASTEWATER AND WATER SUPPLY SERVICING INFRASTRUCTURE

- 7.8.1 Infrastructure reporting has been prepared by Andy Hall of Davie Lovell – Smith for the request. The infrastructure report covers the requests serviceability, noting that the design and construction of the proposed infrastructure is proposed to be undertaken in accordance with the requirements of Councils Infrastructure design guides. Mr Naidoo, Council's Senior Planning Engineer has reviewed the request in relation to water supply and wastewater discharge and concurs with Mr Halls position.

- 7.8.2 Water supply modelling showed that while the proposed plan change area can be serviced, the fire water flows can only service a Fire Water Classification three (FW3) arrangement and that alternative onsite fire protection may be required on individual sites, or potentially a private fire supply could be considered to raise the Fire Water supply. The method for determining the required water supply for land uses is detailed in Table 1 of the Fire Fighting Water Supplies Code of Practice (FFWSCP). Table 1 identifies four Fire Hazard Categories (FHC) and then applies the required Fire Water classification to the FHC's. The FHC's are described as:

- *FHC 1 - sleeping activities including care facilities, motels, hotels, hostels; crowd activities of <100 people including cinemas, art galleries, community halls, lecture halls, churches; working/business/storage activities processing non-combustible materials such as wineries, cattle yards, horticultural products; multistorey apartment block*
- *FHC 2 - crowd activities of >100 people, libraries, book storage, night clubs, restaurants; working/business/storage activities with low fire load such as hairdressers, banks, medical consulting rooms, offices*
- *FHC 3 - working/business/storage activities with medium fire load such as manufacturing, processing, bulk storage up to 3 metres.*
- *FHC 4 - working/business/storage activities with high fire load such as chemical manufacturing, feed mills, plastics manufacturing, supermarkets or other stores with bulk display over 3 metres*

- 7.8.3 The following table is a summary of Table 1 from the FFWSCP showing the fire water supply requirements for Fire Cell Areas and FHC's. A fire cell is defined in the building code as "Any space including a group of contiguous spaces on the same or different levels within a building, which is enclosed by any combination of fire separations, external walls, roofs, and floors". The fire cell represents the max footprints achievable by buildings without internal fireproofing, which in many cases will be inappropriate for heavy industrial land use.

Fire Hazard Category (FHC)	Fire Cell Area (sqm)				
	0-199sqm	200-399sqm	400-599sqm	600-799sqm	1000-1199sqm
FHC 1	FW3	FW3	FW4	FW4	FW4
FHC 2	FW3	FW4	FW5	FW5	FW5
FHC 3	FW3	FW4	FW5	FW5	FW6
FHC 4	FW4	FW6	FW6	FW6	FW7

- 7.8.4 FW3 only goes as far as providing adequate supply for FHC's 1, 2 and 3. Of particular relevance is that FW3 only allows fire cells of 0-199sqm for FHC 3 activities, and FHC 4 activities require FW4 water supply in the first instance. It is noted that in Table 2 of the FFWSCP, FW4 is double the supply of FW3 and my understanding informed by Mr Naidoo is that achieving FW4 or greater would require a significant infrastructure upgrade. Important to this proposed zoning, is the FW3 water supply limitation that only non-combustible industrial activities consistent with FHC 1 could be enabled in the PPC19 area. Further, the requirement for a large number of fire cells being constructed within buildings to enable FHC 3 and 4 activities. I consider this water supply constraint to have implications regarding the inappropriateness of Industrial Heavy zoning, given in practice it is likely to significantly limit the types of activities provided for under this zone. I have included the full Table 1 and Table 2 of the FFWSCP as appendices for reference.

- 7.8.5 A further matter for consideration of the appropriateness of the proposed IH zoning, relates to wastewater servicing limits. Wastewater modelling commissioned by the Council on behalf of the application, demonstrates that a local pressure sewer system could service the proposed industrial development, however with a sewer discharge limit. A low-pressure sewer system is described as a wastewater collection method that uses septic tank effluent pumps to transport sewage from individual properties to a central reticulation network. This differs from conventional gravity sewer systems, which rely on continuous downward gradients and large pipes. The discharge limit is required as in times of high flow there is insufficient network capacity. Low-pressure sewer systems are used to control discharge rates. Mr Naidoo discusses the serving requirements to restrict the number of discharges that industrial land use can produce, or alternatively requirements for large septic tanks to hold discharge before releasing into the network. Mr Naidoo's conclusion is that

urban development in the PPC area can be serviced but with constraints on sewer discharge and availability of fire water supply.

7.9 STORMWATER MANAGEMENT

- 7.9.1 Mr Norton - Senior Stormwater Planning Engineer has reviewed the request for the Council and provided evidence in appendix 7. His evidence sets out Council requirements for stormwater to be disposed of into land via infiltration in areas of the city, particularly on the western part of the city where there are free-draining soil textures (gravels and sands) prevalent below shallow layers of topsoil and silts. Mr Norton explains the suitability of infiltration in this location also due to the high seasonal groundwater is “deep” (greater than 1m below ground level) reducing the potential for contaminants to enter groundwater sources.
- 7.9.2 Mr Norton concludes in his evidence that any potential adverse effects arising from this request could mitigate its effects on stormwater and flooding through standard conditions of resource consent that are currently applied to similar industrial developments. Chapter 8.6.9 of the CDP details the rule framework for stormwater disposal and subdivision, and I am satisfied these provisions cover any potential adverse effects that could arise from development of the PPC19 area. Following Mr Norton’s expert advice and the controls in the CDP, I am satisfied that any stormwater effects can be mitigated and the proposal is appropriate in terms of stormwater.

7.10 GEOTECHNICAL GROUND CONDITIONS

- 7.10.1 CGW Consulting Engineers, (authored by Tom Van Deelen and Robert Smith) carried out, for the applicant, detailed ground investigations in accordance with the guidelines for geotechnical assessments in Canterbury. The reports conclude that based on the ground conditions encountered during the geotechnical investigation, CGW considers the site suitable for the proposed rezoning of residential and rural land to industrial.
- 7.10.2 The report notes that the request was qualitatively assessed for liquefaction potential. Based on the site investigation testing, and the sites MBIE classification and liquefaction mapping of the surrounding area, CGW considered the liquefaction risk to be low and likely consistent with a TC1 technical classification. The report does note that further testing is required to accurately determine the liquefaction risk of the site and this would appropriately be mitigated at subdivision stage.
- 7.10.3 I rely on the geotechnical report provided by the request that the private plan change request area is suitable for industrial development and any actual or potential effects related to liquefaction can be mitigated via engineering solutions.

7.11 LAND CONTAMINATION

- 7.11.1 CGW Consulting Engineers, (authored by Tom Van Deelen and Robert Smith) carried out for the applicant, detailed ground investigations in accordance with the guidelines for geotechnical assessments in Canterbury. Their site walkover and investigations did not encounter any obvious evidence of site contamination or hazardous activities. I cover the applicability of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health in section 6.6.

7.12 BIRD STRIKE MANAGEMENT

- 7.12.1 Christchurch International Airport Limited (CIAL) have provided a submission in regard to the potential adverse effects of Bird Strike and the mitigation of those effects, their submission sought that the request:
- 7.12.2 provide information assessing whether the range of heavy industrial activities enabled as permitted activities by the proposed rezoning has the potential to increase bird strike risk to aircraft operations at Christchurch International Airport and;
- 7.12.3 that appropriate provisions are made in the plan change to address bird strike risk, including but not limited to, limitations on specific bird-attracting activities, additional assessment requirements for certain land uses; or other mechanisms to ensure that any bird strike risk is identified and appropriately managed before activities proceed.
- 7.12.4 In the first instance, the operative District Plan has a planning framework that manages these potential adverse effects within Chapter 6.7.4.3 Bird Strike Management Areas and Appendix 6.11.7.5 which identifies the area that bird strike provisions are applicable within. I note that the appendix area identified is all land within 3km of the Christchurch Airport runway, the PPC19 request area is more than 6km away from the runway. I will revisit my position on bird strike if new evidence is prepared on the matter by the applicant or submitter, however the best available evidence available to me at this time is the expertise provided and evaluated in the Christchurch Replacement District Plan (CRDP).
- 7.12.5 Council engaged Dr Rachel McClellan an ornithologist to provide advice on the matter, Decision 57 of the IHP outlines in paragraphs 443 – 444;
- *Dr McClellan did not support imposition of the 3km, 8km and 13km distances, primarily because: ... the country in which they were developed (the US) has a very different bird community, and published research inevitably recommends location-specific solutions, relevant to the species and habitats present at a particular airport. Likewise, very little objective data exists for me to be able to confidently recommend what minimum size of waterbody would support 'significant' populations of hazardous waterbirds." Noting those limitations, Dr McClellan indicated she could support rules that required landfills within Christchurch District having to mitigate for*

gull attraction and requiring piggeries, poultry farms, fish processing plants and freezing works, within three kilometres of the airport, having to be managed to prevent them becoming a source of food for birds. In addition, for waterbodies within 3km of the airport, she supported having a 1,000m2 trigger for the obligatory consideration of bird strike mitigation.

- 7.12.6 These recommendations ultimately formed the provisions in the operative CDP with Fish processing, packing plants, abattoirs and freezing works being required to be enclosed operations within 3km of the airport and new landfills requiring resource consent. The IHP at paragraph 467 remarked that at that time there was insufficient evidence to find that regulation beyond 3km as sought by CIAL would give rise to a sufficient risk management benefit.
- 7.12.7 During the Selwyn District Plan Review (SDPR) a similar submission and bird strike provision was pursued by CIAL. In that case, the hearings panel was not persuaded on merits to include any additional provisions relating to bird strike. However, a CIAL appeal and subsequent mediation resulted in policy EI-P6B being inserted into the Selwyn District Plan (SDP) which outlines to manage the risk of bird strike to aircraft within 13km of Christchurch Airport for any landfill or mineral extraction, and within 8km Christchurch Airport manage any earthworks, commercial food processing, wastewater treatment, meat/fish facilities, and waste facility land uses.
- 7.12.8 I note that the activities CIAL have concern with are only permitted in the Industrial Heavy Zone and not the Industrial General Zone. I consider this relevant to my recommendations in section 7.3. The policy direction of the SDP has been noted in my reporting as Council is required to have regard to consistency of its District Plan with adjacent territorial authorities under s74(2)(c) of the Act. However, this is a Private Plan Change and not a review of bird strike provisions where the Selwyn Policy would be more applicable to creating a comprehensive effects framework across Districts.
- 7.12.9 To summarise, I agree that aircraft bird strike effects are a matter that requires management and mitigation, however, the issue has previously been evaluated by the CRDP IHP, and the operative CDP framework was considered the most appropriate method to mitigate bird strike effects in terms of s32. My planning opinion is informed by that previous CRDP IHP decision in the absence of updated information on bird strike effects. I will revisit this position in my summary statement if new evidence is prepared on the matter, otherwise I refer to my recommendations in section 7.3 to mitigate CIAL's concerns regarding bird attracting heavy industrial activity. Overall, at this time I recommend the submission by CIAL is rejected in part.

7.13 GROUNDWATER QUALITY

- 7.13.1 CRC submitted neutral to this proposed plan change noting that CRC's primary concern was potential adverse effects on groundwater quality as a result of the change in zoning from RuUF to

Industrial Heavy Zone and associated heavy activities. CRC included in their submission that subject to the implementation of appropriate mitigation measures, the site may be suitable for heavy industrial use. I acknowledge the concerns of CRC and rely on Mr Norton in terms of the appropriate mitigation measures to apply to ensure compliance with the Huritini-Halswell Stormwater Management Plan (CCC, 2025) and Comprehensive Stormwater Network Discharge Consent (CSNDC) CRC252424. Mr Norton's evidence describes how, in areas of the city where high seasonal groundwater is "deep" (greater than 1m below ground level) and free-draining soil textures (gravels and sands) are prevalent below shallow layers of topsoil and silts, the Council requires stormwater to be disposed of into land via infiltration. Doing so has two primary benefits: 1) It relieves stress on downstream surface water networks, and; 2) it recharges groundwater to compensate for reduced natural infiltration caused by the new impervious surfaces of development. Mr Norton explains how the "first flush" is managed, his evidence describes that the first flush is the first portion of stormwater runoff that leaves a developed surface and this stormwater contains the highest concentration of contaminants. "The first flush of stormwater generated from new development is required to pass through a treatment train consisting of a gross pollutant trap or other 'pre-treatment' system to remove rubbish, debris and coarse sediment, followed by an infiltration basin lined with an engineered treatment media mix consisting of sand and quality topsoil. This type of treatment system is referred to as an infiltration or soil adsorption basin. Contaminated stormwater is held in the soil adsorption basin where it passes vertically through the sand/soil media, allowing particulates and dissolved metals to bond to charged media particles. Treated stormwater then discharges through free-draining gravels below and into the groundwater aquifer. Soil adsorption systems can be extremely efficient at removing sediment, metals, nutrients and E.coli from stormwater." Overall, I rely the expertise of Mr Norton and the established mitigation methods used elsewhere in Christchurch City to mitigate CRC's concerns.

- 7.13.2 I note that my proposed recommendation of rezoning the area Industrial General rather than Industrial Heavy will reduce the potential land uses that could have detrimental impacts on groundwater quality. Overall, I accept this submission from CRC and acknowledge the importance of protecting groundwater quality, and in my view, supported by Mr Norton's expertise, appropriate mitigation methods are in place to mitigate any potential adverse effects.

7.14 ROLE AND FUNCTION OF TEMPLETON

- 7.14.1 The Templeton Residents' Association provided a submission seeking recognition of Templeton's role as a valued gateway village within Christchurch. I consider this recognition is outside the scope of this private plan change request but note that future area planning processes led by Council will be a more appropriate forum to consider the role and function of Templeton.

7.15 DESIGN OF INDUSTRIAL BUILDINGS

- 7.15.1 Submitter 7 Warren & Pauline Newell have provided photos of the Cottonsoft building and state that the scale and bulk of the building has been a major source of disappointment and discussion within the community. I appreciate that the visual look of buildings is subjective but the CDP does not specify the exterior design/appearance of industrial buildings and ultimately the controls in the District Plan are what Council can enforce

7.16 ALTERNATIVES TO INDUSTRIAL HEAVY ZONE AND HEAVY INDUSTRIAL ACTIVITIES?

- 7.16.1 Having concluded in paragraph 7.7.6 above that the Industrial Heavy Zone and in particular Heavy Industrial Activities are incompatible with the Frontage Properties, I now turn to considering alternatives.
- 7.16.2 The NPS-UD and long term need for business land in my view concludes that some degree of mitigated industrial activity is appropriate for the request area, therefore, I will evaluate an alternative in terms of s32 and conclude with a s32AA assessment.
- 7.16.3 An alternative zoning approach that enables industrial development but mitigates potential effects is the Industrial General Zone. As noted in 7.7.4 above, the zone permits manufacturing, fabricating, processing, repairing, assembly, packaging, wholesaling or storage of products, ancillary retail, warehousing and logistics, and yard based suppliers, but not Heavy Industrial Activities.
- 7.16.4 The s32 evaluation for the request considered the benefits and costs of Industrial General zoning. Benefits were described as “Will potentially reduce amenity impact on the residential dwellings and reduces the opportunity for a more efficient use outcome over both the subject land and the adjoining IH land now under development” and the costs being “Still provides for an industrial zoning over all of the subject land, likely to have only a limited time benefit to the residential neighbours, less efficient and integrated outcome than IH”. In response to this evaluation, I have concluded that Industrial Heavy Activities are incompatible adjoining the Frontage Properties due to their potential to generate significant adverse effects. Thus, a benefit of General Industrial Zoning is that those activities would no longer be permitted and any adverse effects could be mitigated. The s32 outlines that Industrial General would not be as efficient as Industrial Heavy. I disagree, Industrial General permits a wide range of industrial activities as noted throughout this report.
- 7.16.5 Relevant to my s32AA recommendation is that Council has an obligation to ensure there is sufficient development capacity for business land to meet the expected demand. The BCA identifies a long term shortfall of industrial land and thus additional business land is required within Christchurch City. The BCA outlines that manufacturing, fabricating, warehousing and logistics sectors as activities of high demand which are all enabled by both Industrial General and Industrial

Heavy. Warehousing and logistics land use is forecast to be significant in the long term with demand reaching 748ha in Christchurch City. The BCA notes that the growth of warehousing and logistics reflects global trends. In terms of location specific demand, it is expected that warehousing and logistics would be most desirable in the south, south-west and west of Christchurch due to access to the State Highway network, Christchurch Airport, Lyttleton Port and inland ports in Woolston and Rolleston. Industrial General Zoning would enable the area to be utilised for a land use activity that has been identified in the BCA that is in high demand while being in a location that has been identified by the BCA as highly desirable, the south-west. Considering s32AA, I consider this contribution to long term industrial supply is a benefit that supports the rezoning.

7.16.6 Turning to CIAL's submission, CIAL as I understand it is primarily concerned with reducing the potential for bird attracting activities. These activities have been noted in the SDP as landfills, mineral extraction, earthworks, commercial food processing, wastewater treatment, meat/fish facilities, and waste facility land uses. I note that the Industrial General Zone doesn't enable any of these activities whereas the Industrial Heavy Zone does through the Heavy Industrial Activity rule. In my view this is a positive for the alternative option as using the Industrial General Zone could nearly mitigate the potential for bird strike effects. In terms of s32AA, this is a benefit with limited cost, the only cost being the inability to establish wastewater treatment plants/fish processing facilities etc in the area, but as I have already concluded based on the framework of the CDP, the potential adverse effects that would arise from these activities are significant and not appropriate.

7.16.7 I noted in section 7.8 above that Council's water supply network is constrained in this area and can only provide fire water supply to a standard of FW3 at this time. My understanding of the Fire Fighting Water Supplies Code of Practice (FFWSCP) is that significant upgrades to the water supply network would be required to service major heavy industry in the area. In my view, this is relevant to the s32AA evaluation. The implication being that heavy industrial activities are potentially not feasible due to fire water supply. In terms of efficiency and effectiveness I do not believe it is appropriate to enable land uses that are unable to be realised due to infrastructure constraints.

7.16.8 The following s32AA will support my recommendation to rezone PPC19's bare rural area, identified in figure 1, Industrial General Zone rather than Industrial Heavy Zone.

Benefits	Appropriateness in achieving the objectives/ higher order document directions
Environmental: Industrial Activities will be permitted but be able to mitigate their effects through established rules framework that doesn't subject the Frontage Properties to significant adverse effects from wastewater treatment, burning of oil, tannery, fish plants etc	Efficiency and Effectiveness: The alternative will require aspects of the existing ODP provisions to be repackaged into the Industrial General Zone. The alternative enables Council to meet its obligations to provide for sufficient business land for warehousing and logistics
Economic: Enables the rezoning of business land which Christchurch City requires in the long	

term, 444ha of industrial business land is required with a large portion of demand being warehousing and logistics which would be enabled by the Industrial General Zone	activities which are in high demand in a suited location. The alternative mitigates potential bird strike risk.
Social: The Industrial General Zone would enable additional employment similar to the original proposal but not significantly effect the well being and amenity of the frontage properties	The alternative reflects the infrastructure realities of the request area.
Cultural: Industrial General Zone does not permit activities with potential to discharge hazardous material or significant adverse effects on groundwater.	The alternative does not have the potential to produce significant adverse effects on adjoining properties due to permitted activities as discussed in section 7.3 of this report, any effects that do arise can be mitigated via either existing District Plan rules or recommended building setbacks of 25m.
Costs	
Environmental: There will still be a degree of adverse effects on the frontage properties, however these will be able to be mitigated by the existing provisions of the Industrial General Zone alongside building setbacks recommended in this report.	A new ODP would be required within the Industrial General Zone which would increase repetition of rules, but would better reflect the intention of Chapter 16's zones as described in Policy 16.2.1.3(a)
Economic: The zoning would not be enable the construction of heavy industrial activities and their assumed economic benefits.	
Social: There will still be a degree of adverse effects on the frontage properties, however these will be able to be mitigated by the existing provisions of the Industrial General Zone	
Cultural: Nil	
Risk of not acting: Risk of not acting is that significant adverse effects are located adjoining the frontage properties which would bring about incompatible activities which are sought to be avoided in the strategic directions of the Christchurch District Plan.	
Recommendation: This option is recommended as it is considered to be the most appropriate method to give effect to direction in the act to provide business land in areas of high demand while mitigating the potential adverse effects of industrial use on adjoining property.	

7.16.9 In appendix 2 below I have attached recommended provisions that give effect to this s32AA. The recommended provisions are intended to reflect the existing South West Hornby ODP put forward by the proponent, with the only difference being the building setback provisions which I have discussed above.

8 CONCLUSIONS AND RECOMMENDATIONS

- 8.1.1 Having considered all of the submissions and reviewed all relevant instruments and statutory matters, I agree with the concern raised by the Frontage Properties submitters, in terms of the incompatibility between potential heavy industrial activities locating directly adjacent to existing residential uses.
- 8.1.2 It is my view that Heavy Industrial Zone is an incompatible zone adjoining the Frontage Properties and therefore the zoning of the PPC19 request area to Industrial Heavy Zone is not effective, efficient nor appropriate in s32 terms. I have provided a detailed analysis of the issue and recommended an alternative zoning approach after considering the operative provisions of the CDP and direction to not create conflicts between incompatible activities.
- 8.1.3 I recommend that Private Plan Change 19 be accepted in part but with amendments that recommend the zoning of the area be Industrial General Zone and the Frontage Properties be excluded from the plan change area at this time. I consider this approach more appropriately achieves the purpose of the Act than the request.
- 8.1.4 I recommend therefore that:
- a. Private Plan Change 19 be approved with modifications as set out in the attached Appendix 2 and 3; and
 - b. Submissions on the Plan Change be accepted or rejected as set out in Appendix 1 to this report.

8.2 APPENDIX 1 – REPORTING OFFICER RECOMMENDATIONS ON SUBMISSIONS

8.3 APPENDIX 2 – REPORTING OFFICER DISTRICT PLAN RECOMMENDATIONS

8.4 APPENDIX 3 – REPORTING OFFICER RECOMMENDED ZONING

8.5 APPENDIX 4 – FIRE WATER SUPPLY

8.6 APPENDIX 5 – DRINNAN V SELWYN DISTRICT COUNCIL

8.7 APPENDIX 6 – WATER AND WASTEWATER EVIDENCE

8.8 APPENDIX 7 – STORMWATER EVIDENCE

8.9 APPENDIX 8 – TRANSPORT EVIDENCE