

REQUEST FOR A CHANGE TO THE CHRISTCHURCH CITY DISTRICT PLAN

Prepared for

CALDER STEWART DEVELOPMENT LTD
Marshs Road, Main South Road (SH1) intersection



Update September 2025

(FINAL)

Request To Change the Christchurch District Plan under Clause 21 of the First Schedule of the Resource Management Act 1991

TO: The Christchurch City Council

Calder Stewart Development Ltd (CSD) request changes to the Christchurch City Council District Plan as detailed below.

1. **The location** which this request relates is:

Location: On the south-east corner of Marshs Road and Main South Road (SHNo1), Hornby including all the properties set out in Table 1 below.

Total Area: 23ha

2. Parcels of land to be rezoned (Refer Table 1 over) and Annexure A.

3. The Proposed Plan Change undertakes the following in the City Plan Changes underlined or ~~struck through~~:

- Insert new (amended) Outline Development Plans. Attachment 1 to this request.
- Amend the Christchurch City District Planning Maps (and in particular Planning Map 36A) by rezoning the land identified in Table 1 – Parcels to be rezoned and shown on Attachment 3 to this request from Rural Urban Fringe (RUF) to Industrial Heavy (IH).
- To amend rules as follows;
16.5.4 Area Specific rules – Industrial Heavy Zone (South West Hornby), refer table 2 over.
- Any other consequential amendments including but not limited to re-numbering of clauses and District Plan maps as appropriate.

4. An Assessment of Environmental Effects is provided in Section 6 in accordance with the requirements of the Resource Management Act 1991 and including Section 32 of the Act.

Signature:

Date: Rev July 2025

REFER TABLE CHANGES

16.5.4 Area-specific rules - Industrial Heavy Zone (South West Hornby)

- a. The following rules and the South West Hornby Industrial Area Outline Development Plan (Appendix 16.8.8 (i) and (ii)) shall apply to the Industrial Heavy Zone (South West Hornby Industrial Area). All activities specified are also subject to the rules in 16.5.1 (Activity status tables) and 16.5.2 (Built form standards) unless specified otherwise in 16.5.4.

16.5.4.1 Area-specific activities - Industrial Heavy Zone (South West Hornby)

16.5.4.1.1 Area-specific permitted activities

- a. The activities listed below are permitted activities in the Industrial Heavy Zone (South West Hornby) if they meet any activity specific standards set out in this table and the built form standards in Rule 16.5.4.2.

Activity	Activity specific standards
P1 Activities listed in Rule 16.5.1.1 P1-P18.	a. Development shall comply with: i. all of the key structuring elements on the South West Hornby Outline Development Plan (Appendix 16.8.8 <u>(i) and (ii)</u>), being: A. Collector Road B. Minor Arterial Road. i. Built form standards in Rule 16.5.4.2, and Rule 16.5.2 unless specified otherwise in Rule 16.5.4.2.
P2 a. Within the area identified as ‘rural wastewater irrigation area’ on the outline development plan (Appendix 16.8.8 <u>(i) and (ii)</u>), rural activities permitted in the Rural Urban Fringe Zone and the irrigation of water from industrial processes. b. Rural activities and irrigation of water from industrial processes are not required to comply with Rule 16.5.4.1.1 P1.	a. Compliance with the Rural Urban Fringe Zone built form standards. b. Any rural activity that does not comply with the Rural Urban Fringe Zone built form standards is subject to the subsequent Rural Urban Fringe Zone rules relating to those standards.
P3 Key structuring elements identified on the outline development plan in Appendix 16.8.8 <u>(i) and (ii)</u>.	a. Development is to be in accordance with the key structuring elements on the South West Hornby Outline Development Plan (Appendix 16.8.8 <u>(i) and (ii)</u>), as identified in Rule 16.5.4.1.1 P1.

16.5.4.1.3 Area-specific restricted discretionary activities

- a. The activities listed below are restricted discretionary activities.
- b. Discretion to grant or decline consent and impose conditions is restricted to the matters of discretion set out in Rules 16.7.1, 16.7.2 and 16.7.3.9, as set out in the following table.

	Activity	The Council's discretion shall be limited to the following matters:
RD1	a. Any development within the Industrial Heavy Zone (South West Hornby) south west of the area identified as 'rural wastewater irrigation area' on the outline development plan in Appendix 16.8.8 <u>(i) and (ii)</u>, until the construction (being physical works) of the intersection of Shands Road and the southern spine road (marked as 'A' on outline development plan in Appendix 16.8.8 <u>(i) and (ii)</u>) including traffic signals has commenced. b. Any application arising from this rule shall not be publicly notified.	a. Roading and access - Rule 16.7.3.9.4
RD2	[Removed]	
RD3	a. Any development (excluding rural activities and irrigation of water from industrial processes) within the area shown as 'rural wastewater irrigation area' on the outline development plan in Appendix 16.8.8 <u>(i) and (ii)</u> until: i. The full southern spine road between Main South Road and Shands Road (marked as 'C' on the outline development plan in Appendix 16.8.8 <u>(i) and (ii)</u>) has been constructed and is open to traffic; and ii. Capacity upgrades have commenced at the following intersections: A. Intersection of the southern spine road and Shands Road (marked as 'A' on outline development plan in Appendix 16.8.8 <u>(i) and (ii)</u>) B. Intersection of the northern spine road and Shands Road (marked as 'B' on outline development	

	Activity	The Council's discretion shall be limited to the following matters:
	plan in Appendix 16.8.8 <u>(i) and (ii)</u>). b. Any application arising from this rule shall not be publicly notified. c. Information requirement for RD3: A full Integrated Transport Assessment shall be completed and included in the application.	
RD6	1. Any development not complying with a key structuring element on the outline development plan in Appendix 16.8.8 <u>(i) and (ii)</u>. 2. Any application arising from this rule shall not be publicly notified.	1. Outline development plan – Rule 16.7.3.9.1

16.5.4.2 Area-specific built form standards - Industrial Heavy Zone (South West Hornby)

16.5.4.2.1 Maximum height for buildings

- The maximum height of any building within 20 metres of the rural zone boundary and the Marshs Road road boundary shall be 10 metres.
- Any application arising from this rule shall not be publicly notified.

16.5.4.2.2 Minimum building setback from road boundaries

- The minimum building setback from road boundaries shall be as follows:

	Applicable to	Standard
i.	Office buildings and Parking buildings on sites with frontage to Marshs Road	10 metres
ii.	All other buildings not facing Marshs Road and provided for in clause (i).	20 metres

- Any application arising from this rule shall not be publicly notified.

16.5.4.2.3 Minimum building setback from the south west boundary and residential properties

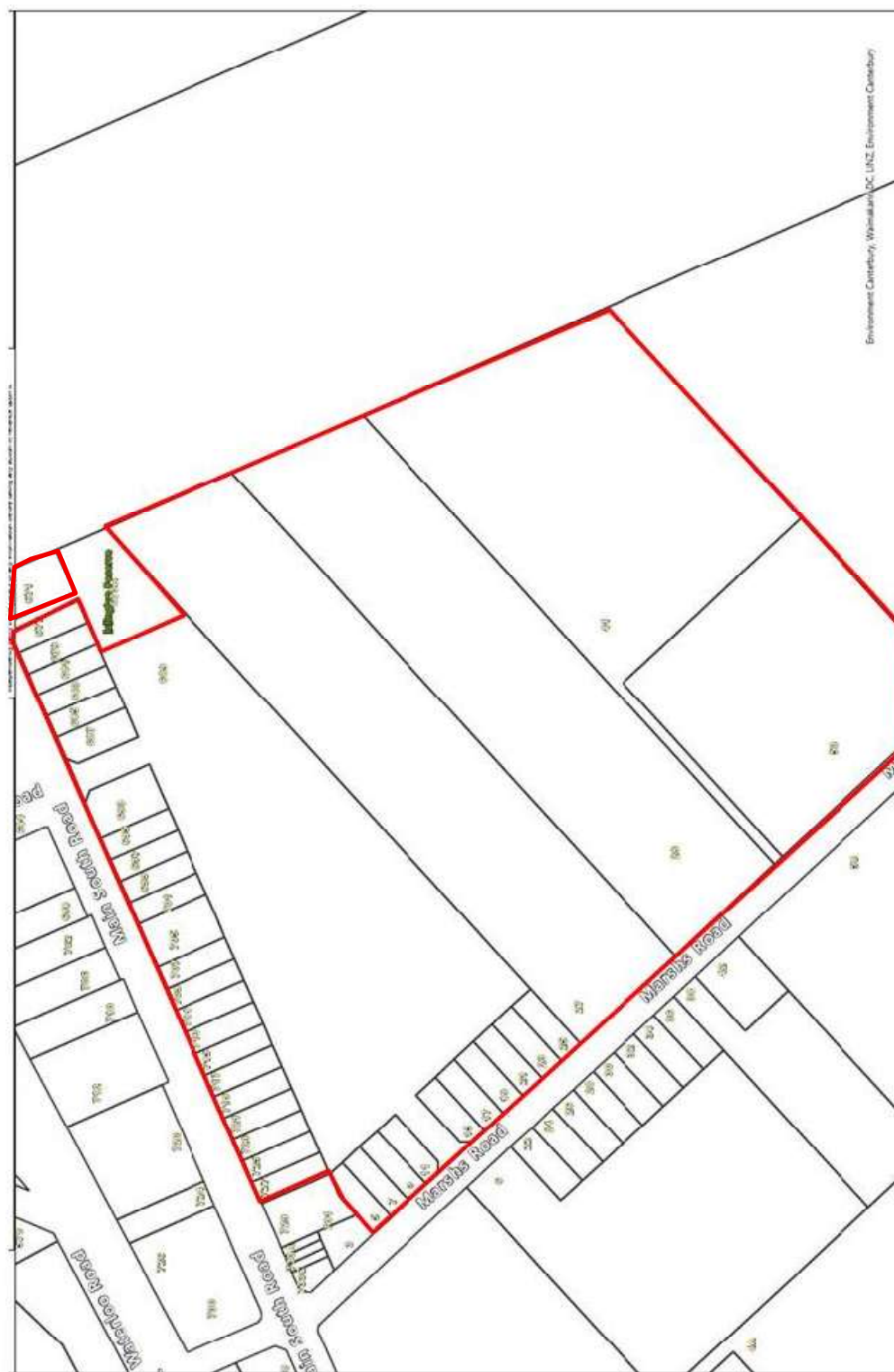
- The minimum building setback from a boundary with a rural zone and from residential properties shall be as follows:

	Applicable to	Standard
i.	A. Sites with a boundary adjoining the rural zone. B. This rule shall not apply to sites adjoining the land identified on the outline development plan in Appendix 16.8.8 as 'rural wastewater irrigation area'.	10 metres

	Applicable to	Standard
ii.	A. Sites adjoining Lot 1 DP64487 (until the existing residential activity ceases - following which no setback shall apply). B. Clause (ii) shall only apply until 30 March 2026 at which time the rule shall no longer apply.	20 metres
iii.	A. A site adjoining <u>an existing residential property fronting SHNo1 (South) and Marshes Road (North)</u> until the ~~existing residential~~ <u>activity ceases following which no setback shall apply.</u> B. <u>Clause (iii) shall only apply until 1st January 2036. (Refer Outline Development Plan – Appendix 16.8.8 (i) and (ii))</u>	20 metres

TABLE 1 – Parcels to be rezoned (Summary) - Refer also Annexure A

Number	Legal Description	Address
1	LOTS 1, 2 DP 16696	671 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
3	LOT 4 DP 76458	677 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
4	LOT 3 DP 76458	679 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
5	LOT 2 DP 76458	681 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
6	LOT 1 DP 76458	683 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
7	LOT 7 DP 16696	685 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
8	LOT 8 DP 16696	687 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
9	LOT 44 DP 16696	689 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
10	LOTS 10, 9 DP 16696	693 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
11	LOT 11 DP 16696	695 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
12	LOT 12 DP 16696	697 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
13	LOT 13 DP 16696	699 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
14	LOT 14 DP 16696	701 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
15	LOTS 15, 16 DP 16696	705 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
16	LOT 17 DP 16696	707 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
17	LOT 18 DP 16696	709 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
18	LOT 19 DP 16696	711 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
19	LOT 20 DP 16696	713 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
20	LOT 21 DP 16696	715 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
21	LOT 22 DP 16696	717 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
22	LOT 23 DP 16696	719 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
23	LOT 24 DP 16696	721 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
24	LOT 25 DP 16696	723 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
25	LOT 26 DP 16696	725 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
26	LOT 27 DP 16696	727 MAIN SOUTH ROAD ISLINGTON CHRISTCHURCH
27	LOT 32 DP 16696	5 MARSHS ROAD TEMPLETON CHRISTCHURCH
28	LOT 33 DP 16696	7 MARSHS ROAD TEMPLETON CHRISTCHURCH
29	LOT 34 DP 16696	9 MARSHS ROAD TEMPLETON CHRISTCHURCH
30	LOT 35 DP 16696	11 MARSHS ROAD TEMPLETON CHRISTCHURCH
31	LOT 36 DP 16696	15 MARSHS ROAD TEMPLETON CHRISTCHURCH
32	LOT 37 DP 16696	17 MARSHS ROAD TEMPLETON CHRISTCHURCH
33	LOT 38 DP 16696	19 MARSHS ROAD TEMPLETON CHRISTCHURCH
34	LOT 39 DP 16696	21 MARSHS ROAD TEMPLETON CHRISTCHURCH
35	LOT 40 DP 16696	23 MARSHS ROAD TEMPLETON CHRISTCHURCH
36	LOT 41 DP 16696	25 MARSHS ROAD TEMPLETON CHRISTCHURCH
37	LOT 1 DP 447493	27 MARSHS ROAD TEMPLETON CHRISTCHURCH
38	LOT 2 DP 447493	29 MARSHS ROAD TEMPLETON CHRISTCHURCH
39	LOT 2 DP 74746	41 MARSHS ROAD TEMPLETON CHRISTCHURCH
40	LOT 1 DP 74746	53 MARSHS ROAD TEMPLETON CHRISTCHURCH



Address for service

McCracken & Associates
P O Box 2551
Christchurch 8140

Attention: Kim McCracken

Telephone: 021 363 497
Email: office@rgmc.co.nz

Address for all Applicant and Council Fees

Calder Stewart Development Ltd
AON House
388 Blenheim Road
Christchurch 8141

Attention: Mark Weaver

Telephone: 021 419 060
Email: Mark.Weaver@calderstewart.co.nz

ATTACHMENT 1

EXISTING OUTLINE DEV.
PLAN – APPENDIX 16.8.8

Appendix 16.8.8 - South West Hornby Industrial Area Outline Development Plan

Key

- ODP boundary
- C.C.C. / Selwyn D.C. boundary
- Electricity transmission corridor
- Railway
- Collector road
- Minor arterial road
- Christchurch Southern Motorway stage 2 designation
- Industrial General zone
- Rural wastewater irrigation area
- Inter section improvements

Note:
Route of the Minor Arterial Road to Main South Road subject to being designated.

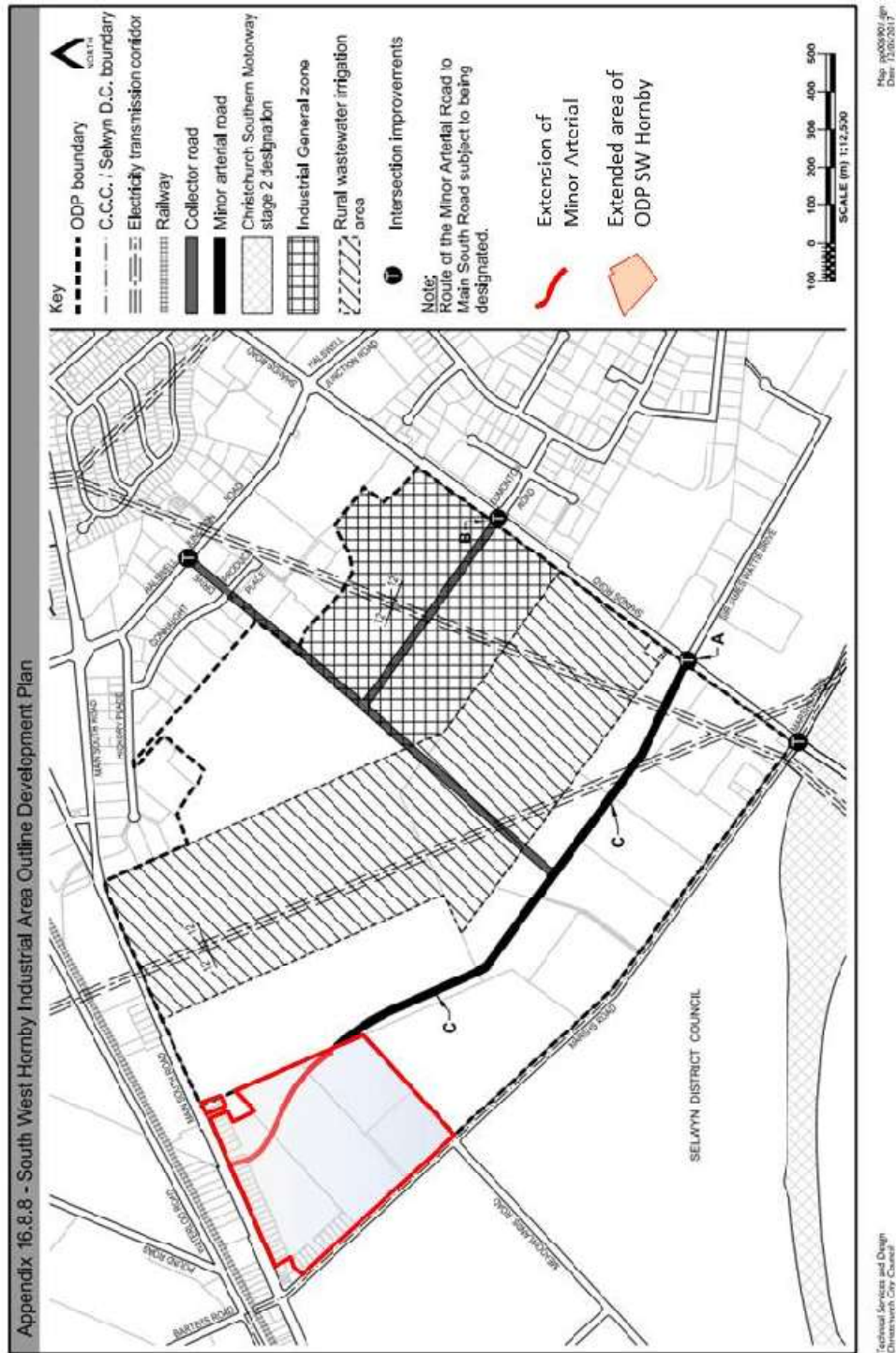
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Selwyn District Council

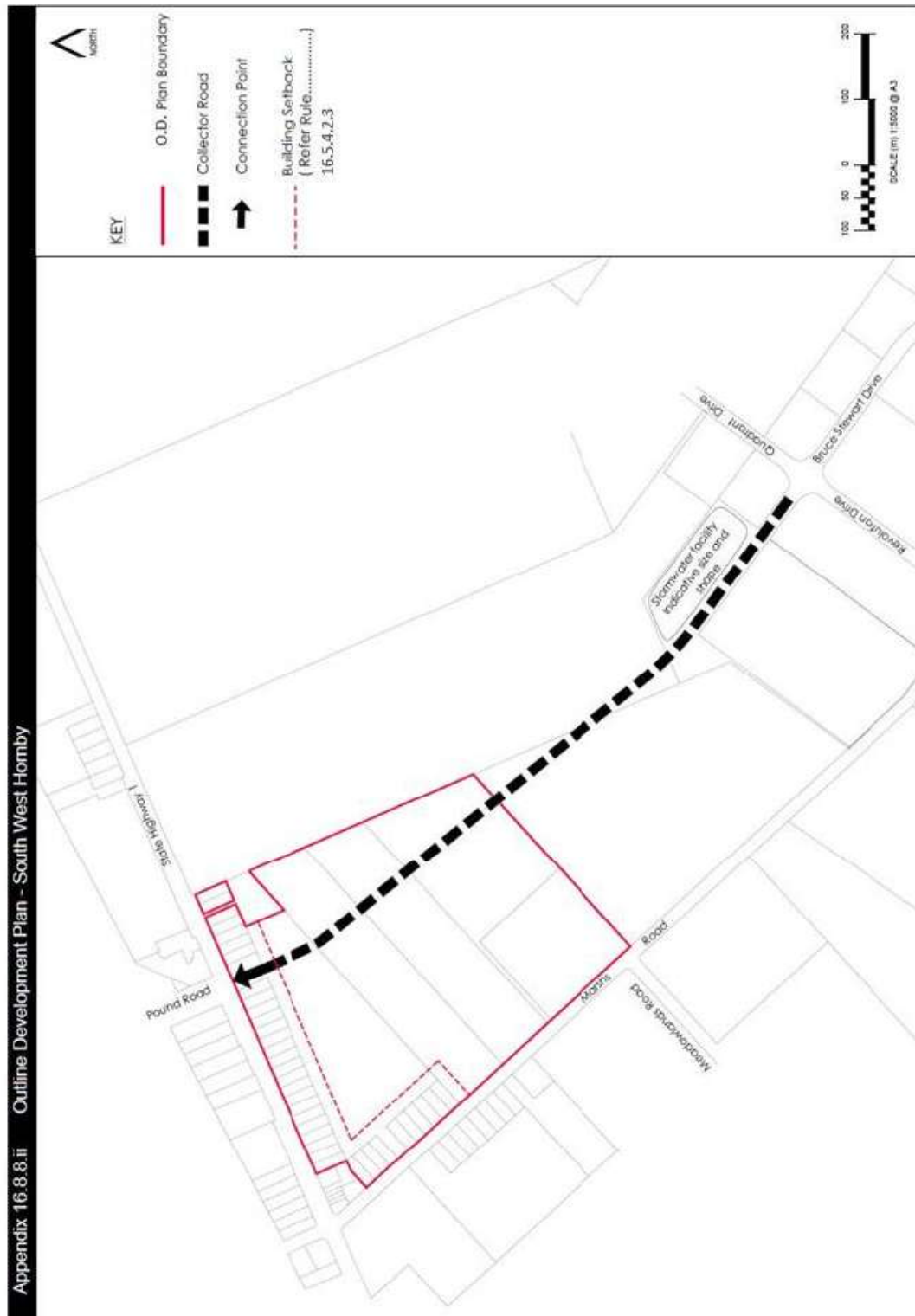
Map: FP-062201.dgn
Date: 12/05/2017

ATTACHMENT 2

PROPOSED/AMENDED
OUTLINE DEVELOPMENT PLAN(S)
16.8.8 AND 16.8.8 (ii)



South West Hornby Outline Development Plan - **Outline development plan new 16.8.8**



South West Hornby Outline Development Plan - **Outline development plan new 16.8.8 (ii)**

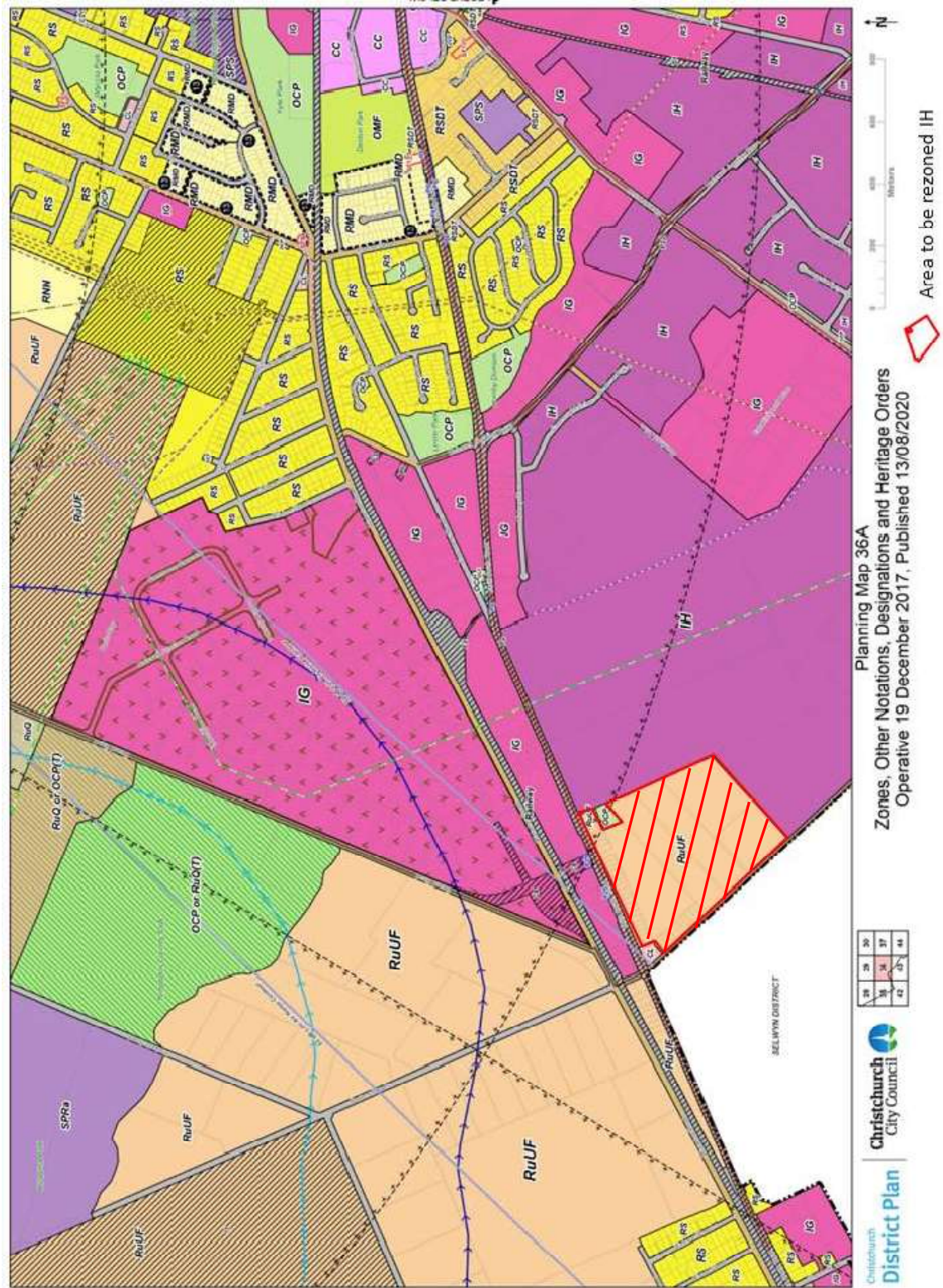


Fig 2 Area to be rezoned IH 

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ANNEXURES

ANNEXURE A: CERTIFICATES OF TITLE

ANNEXURE B: ECONOMIC ASSESSMENT – PROPERTY ECONOMICS LTD

ANNEXURE C: RESEARCH REPORT – INDUSTRIAL LAND SUPPLY – COLLIERS LTD

ANNEXURE D: INFRASTRUCTURE REPORT & RFI RESPONSE – DAVIE LOVELL SMITH LTD

ANNEXURE E: LANDSCAPE & VISUAL IMPACT ASSESSMENT & RFI RESPONSE – RMM LTD

ANNEXURE F: TRAFFIC ASSESSMENT & RFI RESPONSE – STANTEC LTD

ANNEXURE G: GROUND CONTAMINATION – ENGEO LTD

ANNEXURE H: GEOTECHNICAL ASSESSMENT – CGW LTD

ANNEXURE I: AGRICULTURAL REPORT – MRB LTD

ANNEXURE J: PRODUCTIVE LAND REPORT – REEFTIDE LTD

	Resource Management Act 1991 Christchurch City Council Christchurch District Plan	Plan Change
Private Plan Change Request – Calder Stewart Developments Ltd (CSD)		
Refer Christchurch City District Plan Planning Maps		

1. Introduction

- 1.1 Calder Stewart Development Ltd (CSD) requests a change to the Christchurch City Plan to provide for an extension to the existing Industrial Heavy Zone (IH) of approximately 23ha generally at the intersection of Marshs Road and the Main South Road (SHNo1), Hornby.
- 1.2 The Section 32 assessment contains an evaluation of the contents of the plan change and includes references to and the evaluations set out in the:
- Economic Assessment (Annexure B)
 - Industrial Land Market (Annexure C)
 - Transport Assessment (Annexure F)
 - Infrastructure Assessment (Annexure D)
 - Landscape and Visual Assessment (Annexure E)
 - Geotechnical Assessment (Annexure H), and
 - Ground Contamination Assessment (Annexure G)
- 1.3 The land is predominantly used for informal grazing but does include some 34 dwellings generally on sites of around 800m² fronting the Main South Road/SHNo1 and Marshs Road. In addition there are 4-5 lots of around 2ha to 4ha. All of the subject land is zoned Rural Urban Fringe (RUF).
- 1.4 Development in Christchurch and the greater Christchurch area was badly impacted by the Canterbury earthquakes. The response to the earthquakes included Change No1 to the RPS which included a number of provisions relating to business development including but not limited to Policy 6.3.6 ;

6.3.6 Business Land

To ensure that provision, recovery and rebuilding of business land in Greater Christchurch maximises business retention, attracts investment, and provides for healthy working environments, business activities are to be provided for in a manner which:

1. *Promotes the utilisation and redevelopment of existing business land, and provides sufficient additional Greenfield priority area land for business land through 2028 as provided for in Map A.*

Since that time a number of matters have come about;

- Firstly 2028 is now very close and there has been limited change to the provisions for industrial land,
- Analysis of the industrial land supply would indicate that there is a potential shortage of industrial land, particularly in certain localities within the wider Christchurch Urban Area, and
- The NPS – Urban Development has been promulgated which made provision (Policy 8) or opportunity for;

Policy 8: *Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:*

- (a) *unanticipated by RMA planning documents; or*
- (b) *out-of-sequence with planned land release*

2. Background

Planning History

The block of land bounded by State Highway 1, Marshs Road and Shands Road has been zoned for rural uses for many years. The eastern portion adjoining Shands Road was first identified for as a growth area of business development as part of the Change 1 to the Canterbury Regional Policy Statement (CRPS) 1998, which identified most of the block as Greenfield Area – Business, as shown in Figure AA below.

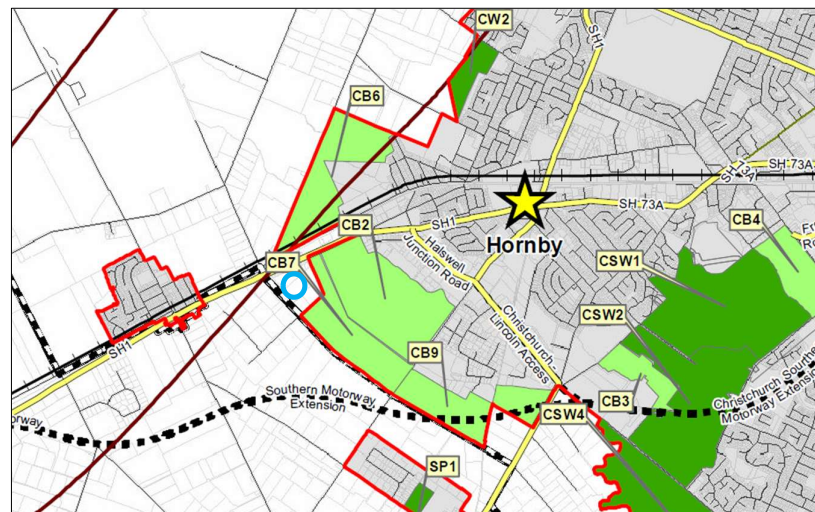


Figure AA –Part of Map A from Chapter 12A of the Canterbury Regional Policy 1998, operative October 2011. SITE 

The identification of the business growth areas in this location did not change as a result of the review of the CRPS, and Figure AB below shows the latest version of Map A.

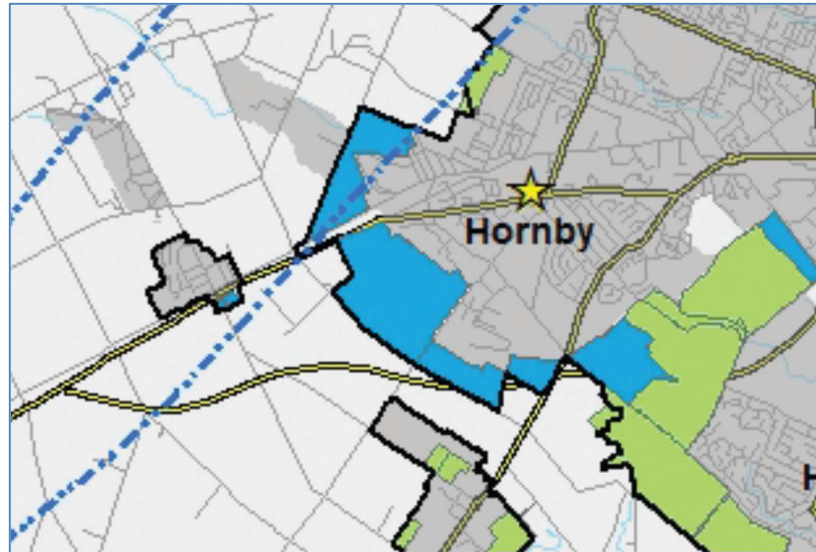


Figure AB –Part of Map A from Chapter 6 of the Canterbury Regional Policy 2013, updated 2021.

It is understood that the subject land was not considered for inclusion within the growth areas during the review process on the CRPS.

As part of the Replacement Christchurch District Plan process undertaken in response to the Christchurch Earthquakes, the area identified above was proposed to be rezoned to Industrial Heavy, as shown in Figure AC below, with an accompanying Outline Development Plan as shown in Figure AD below. The proposed Outline Development Plan (ODP) for this location included a proposed minor arterial road link to the northwest through the Plan Change site that would eventually connect to Main South Road/State Highway 1.

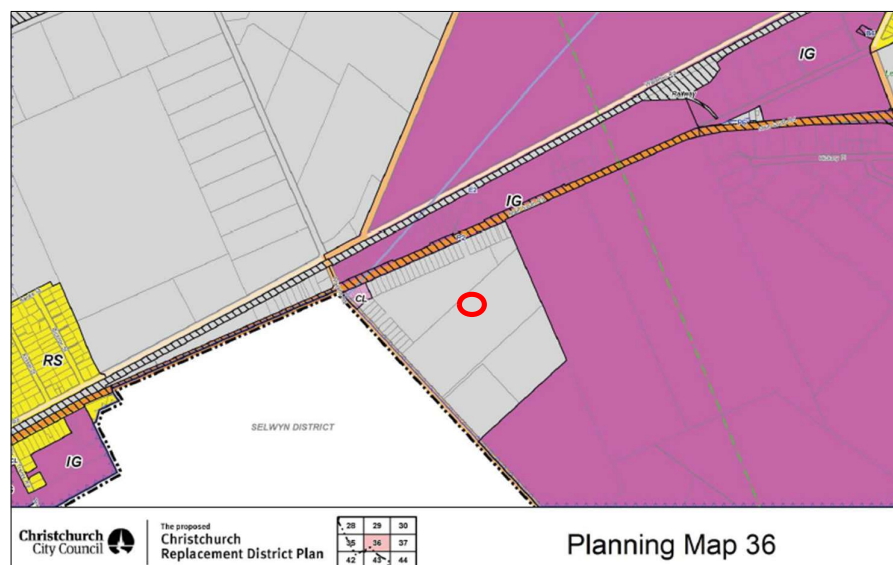


Figure AC –Part of Map 36 from the Proposed Replacement Christchurch District Plan, notified August 2014

Site 

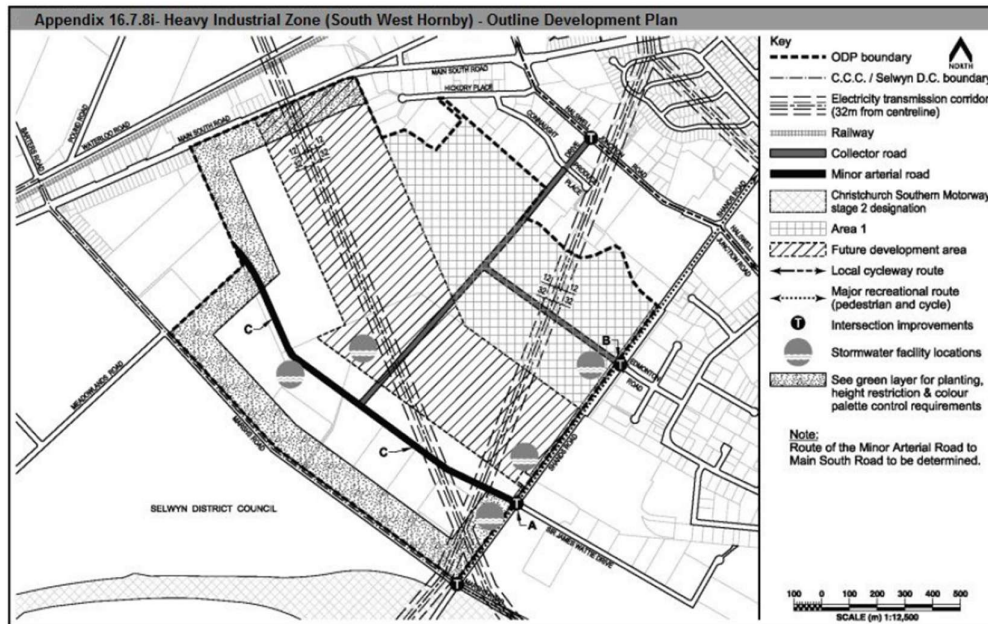


Figure AD – Appendix 16.7.8(i) from the Proposed Replacement Christchurch District Plan, notified August 2014

A submission was lodged by the Canterbury Earthquake Recovery Authority (CERA) with regards to the proposed Outline Development Plan shown in Figure AD. That submission sought to provide for an indicative future road linkage through to Main South Road (Figure AE).

			<i>Whether sufficient fire fighting water supply is available to ensure the health and safety of the community, including neighbouring properties."</i>	
16.3.5 Rules - Industrial Heavy Zone (South West Hornby)	Support in part	Development in the South West Hornby zone is required to comply with the Outline Development Plan (ODP) in Appendix 16.7.8. As reflected in consultation on the ODP, NZTA supports a spine road through the zone and	Retain 16.3.5 Rules - Industrial Heavy Zone as notified with the exception of making minor amendments to the ODP as follows: Illustrate the intent to extend the collector road to SH1 by amending the ODP with an indicative line that extends to SH1, noting that any future connection and exact location with SH1	NZTA
Page 312				
495				
PROPOSAL 16: INDUSTRIAL				
Replacement Plan provision	The Crown's submission is that:		Decisions sought:	Of particular interest to
	Oppose/Support	Reasons		
		acknowledges that it is logical to potentially have one high capacity intersection from SH1 to this area. The ODP shows a minor arterial road heading west toward SH1, but it stops short of SH 1. A Notice of Requirement to realign Barbers Road would require a change in design to a four leg intersection. It is considered that this potential new access arrangement should be recognised in the ODP.	would depend on the status and improvements and layout of that SH/Main North Road intersection at the time.	
16.3.5.1.1 - Permitted Activities	Support	The NZFS supports Rule P11 that provides for emergency service facilities as permitted activities. Emergency services must be	Retain Rule 16.3.5.1.1 (P11) as notified.	NZFS

Figure AE – Part of CERA Submission # 495 to the Proposed Replacement Christchurch District Plan, 8 October 2014

The above submission point was generally accepted as being appropriate by the transport experts involved in the hearing of the Industrial Chapter of the Proposed Replacement Christchurch District Plan, and the proposed change to the ODP was included in the revised proposal presented by the Council at the hearing (Figure AF)

**Appendix 16.6.8 – Industrial Heavy Zone (South West Hornby) and
Industrial General Zone (South West Hornby)**

Appendix 16.6.8i

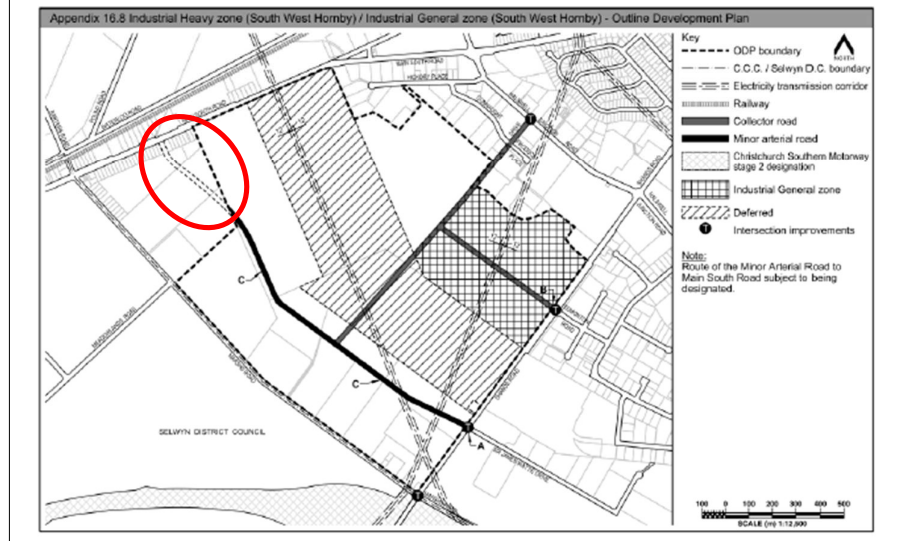


Figure AF – Updated Proposed ODP - Revised Proposal presented to Proposed Replacement Christchurch District Plan. May 2015

Proposed link to SHN01 ○

However as discussed within Decision 11 of the Independent Hearings Panel convened to make decisions on the Proposed Replacement Christchurch District Plan released in December 2015, the Panel had concerns with the inclusion of the indicative road and associated notation about a potential designation through this process. This matter was opposed by one of the then owners.. The Panel agreed that the inclusion of the notation could unfairly prejudice the submitter's position and directed that it be removed from the ODP. As a result, the operative ODP for this location does not show any potential roading connection through to Main South Road (Figure AG).

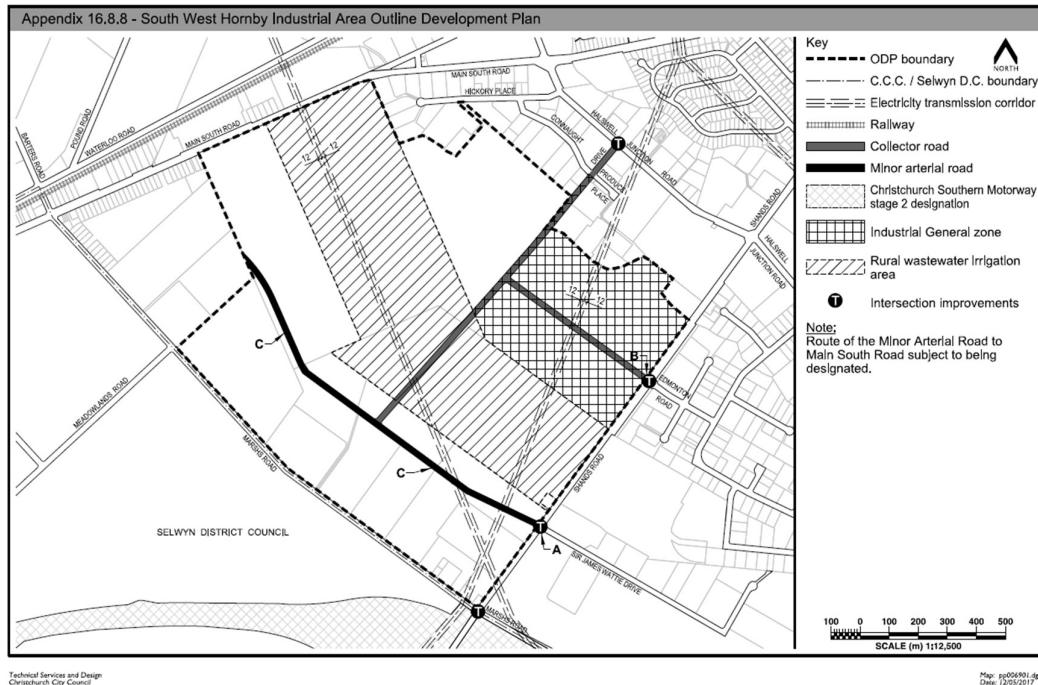


Figure AG – Appendix 16.8.8 South West Hornby Industrial Area ODP, from the Christchurch District Plan, operative December 2019

3. The Site and Surrounding Area

- 3.1 The site is located generally adjacent the intersection of Marshs Road and Main South Road/SHNo1 (SHNo1). The location of the site is shown on the Aerial Photographs (Figs 1 and Fig 2 over, also on p16) and adjoins the north-west corner of Outline Development Plan (ODP) South West Hornby Industrial Area Appendix 16.8.8 (SWH/ODP) of the City Plan (Refer Section 3 of the Plan Change document).
- 3.2 The land adjoining the immediate north-west corner of the site (intersection of Marshs Rd/SHNo1) is zoned Commercial Local (CL) and contains 8 local shops with angle parking. A community park (Islington Park) is located adjacent the north-east corner of the site and is accessed from SHNo1 opposite land zoned Rural General in the Selwyn District Plan containing the premises of Harvest Rural Machinery.
- 3.3 There are multiple access points to the subject land both from SHNo1 and Marshs Road. There are currently some 25 vehicle access points to the land from the Main South Rd/ SHNo1, and 14 vehicle access points from Marshs Road (Refer Fig 1 over).
- 3.4 The land on the east and south boundaries of the site is all zoned Industrial Heavy (IH) with the land to the immediate north across SHNo1 zoned Industrial General (Refer Fig 2 over). The IH zoned land to the south and east has been developed by CSD Ltd (Refer Fig 3) over.



Fig 1 – Aerial

Site

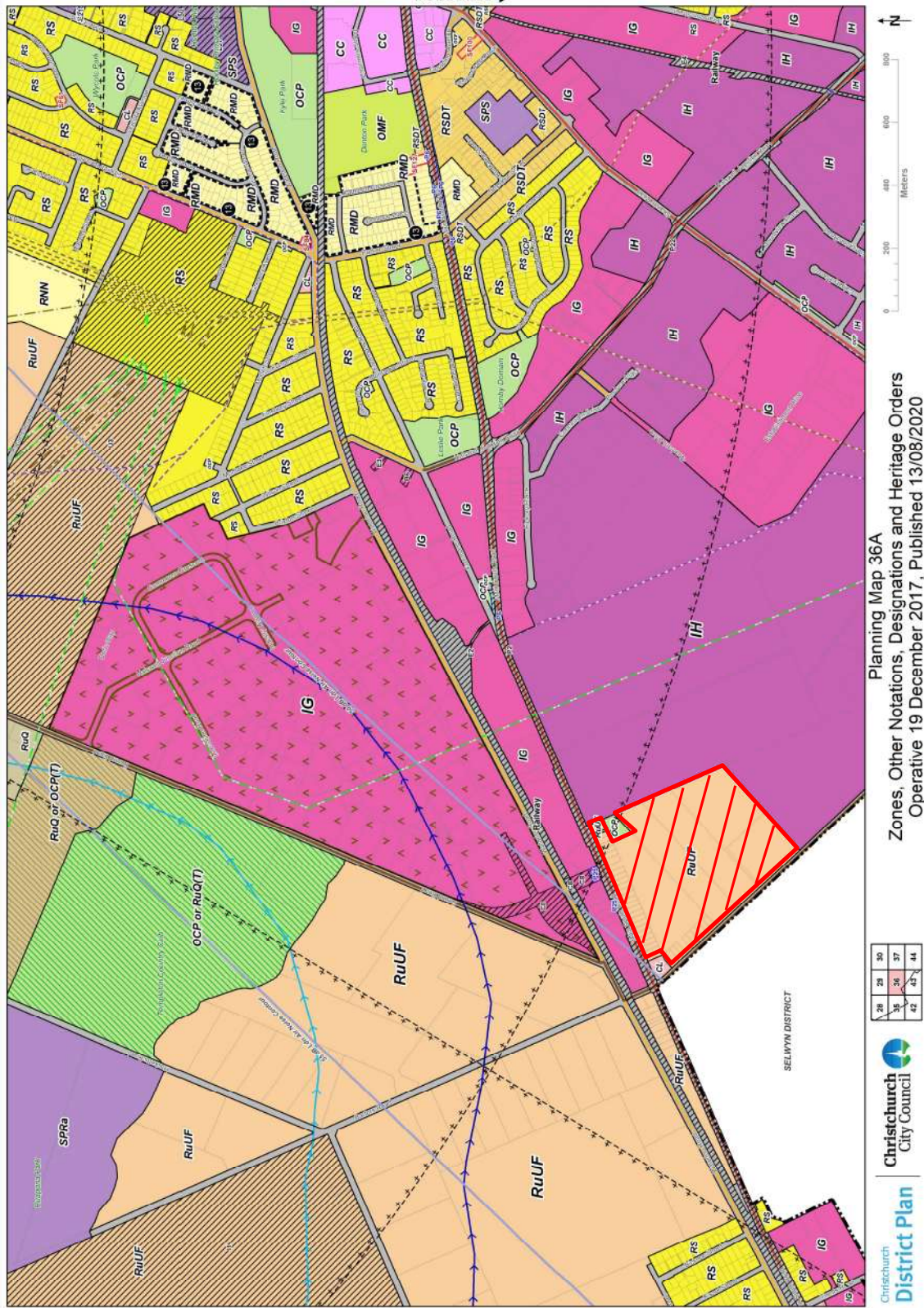


Fig 2 – Zoning Map

SITE

- 3.5 The immediate locality surrounding the subject land has seen a significant change in land use, zoning and character over the last 10 years with the re-alignment of the Pound Road and Waterloo Road intersection and the development of the new light controlled intersection at Pound Road/SHNo1 directly opposite the site. The land directly opposite the site (north side of SHNo1) has been redeveloped for a new service station, tavern and a group of six shops.
- 3.6 Finally, the wider road network in south west Christchurch has undergone significant change. This includes the completion of the southern motorway, the re-alignment of Marshs Road, and the potential to complete a new minor arterial link from Shands Road via the subject land to meet the light controlled intersection at the Pound Road/SHNo1.
- 3.7 As a result of the above and having regard to the following assessments the applicant has now applied for the plan change set out as follows.

4. The Plan Change

4.1 Description of the Proposed Plan Change

The purpose of the plan change is to extend the existing IH zone on the south and east boundaries of the site to include the subject land generally up to the boundaries with SHNo1 (north) and Marshs Road (west). The plan change land will also involve an extension of the ODP (South West Hornby Industrial Area Outline Development Plan), Appendix 16.8.8 (Refer Attachment I to this Change Request). The plan change area will also be subject to the City Plan provisions that apply to the Industrial Heavy Zone subject to the proposed amendment to the rules of the IH zone.

4.2 Industrial Heavy Zone

The purpose of the Industrial Heavy Zone is set out in the City Plan (Section 16.2). Principally;

16.2.1 Objective - Recovery and growth

- a. The recovery and economic growth of the district's industry is supported and strengthened in existing and new greenfield industrial zones.*

16.2.1.1 Policy - Sufficient land supply

- a. Maintain a sufficient supply of industrial zoned land to meet short, medium and long term supply needs of industrial activities, having regard to the requirements of different industries, and to avoid the need for industrial activities to locate in non-industrial zones.*

16.2.1.2 Policy - Enable the development of industrial areas to support recovery

- a. *Encourage the redevelopment of existing industrial zones for industrial activities, particularly in areas that have lost industry and associated employment opportunities due to the earthquakes.*

16.2.1.3 Policy - Range of industrial zones Industrial Zone

A 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.

The objectives are further addressed in Section 9.5 of the Plan Change.

4.3 Amendments to the City (District) Plan

The following amendments to the Christchurch City Plan are proposed.

- (i) Amend the Christchurch City District Plan by rezoning the parcels of land in Table 1 –to the Plan Change request, generally located at the intersection of Marshs Road and SHNo1 (Hornby) from Rural Urban Fringe to Industrial Heavy (Refer also Attachments 1 and 2 to the Plan Change Request)
- (ii) Include new ODP 16.8.8(i) and (ii)
- (iii) Consequential amendments to the rules (refer Plan Change Request, Para 3 (p2))

4.4 Servicing

The IH zone which adjoins the site (south and east boundaries) is currently being developed by the applicant and an indicative layout has been prepared to enable a service assessment to be undertaken (Refer Fig 3). The land subject of the plan change is able to be serviced with stormwater, electricity, telecommunications, water and sewer as set out in the Infrastructure Report (Annexure D). As such there are no servicing constraints that would prevent the development of the site. The site is relatively flat and falls approx. in 1 in 200 to the southeast. The site is bordered by a water race running along Marshs Road. In summary:

Sewer

- All sites will be serviced by a Local Pressure Sewer network. Each site will have a private individual pump reservoir connected to a common pressure sewer pipe in the street. Sewerage will be piped to the exiting Council Pump Station (PS0146 Pound Road) and then to the Council sewer in Waterloo Road.
- The estimated overall peak flow from the development of the block is 0.09gL/s/ha being a total of 2.033L/s.

The assessment and modelling indicates that wastewater capacity should not be an issue in rezoning the land to Industrial Heavy (IH) with a range of outlet options available to consider (Annexure D).

Water Supply

The detail of the proposed water supply is set out in Annexure D. It is expected there will be two connection points to the existing Council system surrounding the area being;

- 200mm Main in Bruce Stewart Drive (past the existing development); and
- 200mm dia. uPVC Main in Mania Road

The peak water supply demand has been calculated in accordance with the CCC IDS Part 7, Chapter 2 and equates to 0.77L/s/site. This is estimated to have a peak demand of 23.1L/s. In addition a fire water supply is required. This is estimated at 75L/s giving a total peak flow of 98.1L/s. The conclusion from the infrastructure assessment is that water supply is not considered a problem.

Stormwater

- The stormwater facility will be constructed in Phase 2 of the Hornby Quadrant development. The facility will provide for Phase 2 and this proposed rezoned area (Refer Outline Development Plan 16.8.8 (i) and (ii)).
- The proposed stormwater design consists of a forebay, a first flush stormwater facility, a redundant retention basin and rapid soakage chambers for storms larger than the nominal first flush event of 25mm.
- These will be completed and commissioned prior to any stormwater discharge from completed development areas. Refer Annexure D.

Through consultation with the CCC it is proposed that stormwater will be treated and disposed of under CCC's global CRC190445 in the following ways:

1. It is assumed 40% of Lot coverage will be roof area. The flows off the roof will be disposed of to ground via on site rapid soakage chambers. These are to be sized to attenuate up to and including the critical 2% AEP storm event
2. The remaining 60% of Lot coverage is assumed to be car parking and landscaped areas which will be pipe to the mains in the road and discharge to the first flush, retention and disposal facilities.
3. Pipes in roads are sized to accommodate the 20% AEP to the stormwater facilities.
4. All overland flow from the Lots and roads is to be conveyed towards the stormwater facilities for treatment and storage of up to and including the 2% AEP critical storm event.
5. Redundant soakage and storage of the 10% AEP 18 hour storm will be provided
6. Any storms exceeding the critical 2% AEP will over top the facilities and discharge to Marshs Road.

The stormwater facilities have been sized in accordance with the Christchurch City Council's WWDG and from prior discussion with CCC's Brian Norton. Refer to Appendix H (Annexure D) for the stormwater catchment plan and basin calculations.

Secondary flow paths within the site will follow the road network. All roads are graded to convey the secondary flow towards the south eastern corner of the site where the proposed basins are located.

Stormwater disposal should not hinder this land being rezoned Heavy Industrial.

Power/Telecommunications/Street Lighting

- Power and telecommunications will be provided to all sites to utility company standards
- All cables will be placed underground
- Street lights will be provided to the roading network and any reserves in accordance with Council standards (Refer Annexure D)

Roading

- The key route through the site will be the extension of Bruce Stewart Drive from its existing end in the adjoining IH development area.
- The land area (and ODP) will be serviced primarily by a new road (Minor Arterial) which will connect to the existing Minor Arterial linking from Shands Road to the south-east boundary of the site (SWH- ODP Hornby

Industrial Area 16.8.8) extending through the site to the SHNo1 (Pound Road) intersection.

- There will be no new road access to Marshs Road.
- Street lights will be installed in all vested roads.

Earthworks

- The intention of the development is to retain the natural land form of the site which will result in minor earthworks for roads and stormwater management.
- The total volume of earthworks (cut to fill) is estimated at 70,000m³.

In summary;

Earthworks will be carried out on the site to ensure that all future sites will drain towards the new or existing roads at a grade of at least 1/500.

The site is not located within a 50 or 200 year flood zone or within a Flood Management Area. The site is not in a Liquefaction Management Area.

There are two natural channels across the site draining from northwest to southeast. These channels will be filled and the secondary flows that would have otherwise been contained in these channels, will be diverted to the roading network. Please refer to the 1 in 200-year flood model in Annexure D.

All topsoil on site will be stripped, stockpiled and replaced on the land immediately following bulk earthworks. All disturbed topsoil will be re-sown with Council specification grass seed mixes. A balance of cut and fill will be maintained on site and removal of material from site will be kept to a minimum. Excess topsoil is proposed to be used in a landscape bund parallel to Marshs Road within the allocated 10m landscape setback. Material from under the bund will also be excavated out and used on site. The excavation will be filled with excess topsoil. This excavation will be within 50m of the water race on Marshs Road and this will result in consent being required from Environment Canterbury.

Sediment runoff within the site will be controlled as per Council requirements. The basis of the sediment control will be the Environment Canterbury Guidelines and the discharge during construction will be undertaken either under Council's overall discharge consent or in accordance with Environment Canterbury rules. All dust created on the site will be controlled by water cart or other such Council approved methods. An erosion, sediment and dust control plan will be compiled and submitted to both local and regional council for approval.

All bulk Earthfill will be compacted in accordance with NZS 4431:2022. All fill testing will be carried out by an independent laboratory (Refer Annexure D)

5. Consultation

The applicant has undertaken extensive consultation with the staff of the Christchurch City Council.

The applicant has also consulted with Waka Kotahi (NZTA). This consultation focussed on the opportunity the rezoning and amendments to the ODP provide to significantly improve the roading network in the area. In summary this would involve:

- Connecting the new (minor arterial road accessing up to the south boundary of the site by an extension of that minor arterial road through the site to link up to the Pound Road/SHNo1 intersection opposite the north boundary of the site, thereby providing a more legible and connected road hierarchy in the area (Refer Attachment 2), and
- Reducing the reliance on Marshs Road, both at the intersection with SHNo1 and along the full length of Marshs Road (Refer Annexure F).

Information will be provided to and consultation initiated with the local runanga. That consultation will be undertaken through Mahaanui Kurataiao Ltd. It is understood this will be initiated by the CCC. In addition the applicant has held two drop in sessions for local residents within the proposed rezoning area and some 20 people attended. The main issues (concerns) raised by the residents were;

- The need for additional Industrial land
- The small size of the 20m setback for the next 10 years
- General concerns re noise, lighting,
- Concerns regarding rates increases/property values,
- The effectiveness of the setback buffer in terms of noise, amenity and the future of the existing reserve and long term future of the buffer,
- Traffic impact and noise from the new intersection, and
- Concerns regarding the environmental/amenity impact of heavy industry
- Comments on the proposed residential buffer, would like denser landscaping, acoustic wall etc,
- One person was in favour of the buffer proposed. Would like to see car parking up to the proposed boundary with a decent fence,
- Interested in a land swap with the existing reserve – integrate into the subdivision and improve it,
- Want to extend the reserve behind the houses through to Marshs Road,
- Concerned about building consent issues under heavy industrial plan,
- Concerned about acoustic issues when the new intersection is built,
- Regarding the proposed intersection, want berms on either side of the road (not shown on sketch), and
- Concerned about heavy industrial activity working hours; air quality, noise, traffic impacts

6. Assessment of Environmental Effects of the Proposed Plan Change

The assessment is being undertaken in respect of Clause 22(2) of Schedule 1 that required the following to be undertaken:

(2) Where environmental effects are anticipated, the request shall describe those effects, taking into account clauses 6 and 7 of Schedule 4, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change, policy statement, or plan. 7.2 Clause 6 outlines the information required in an assessment of environmental effects. In comparison Clause 7 specifies the range of matters that must be addressed by an assessment of environmental effects.

The issues, Objectives and Policies of the Christchurch City District Plan, the Regional Policy Statement and National Policy Statements relevant to enabling the development (ie NPS, Highly Productive Land, Urban Development) have been addressed while assessing the range of actual or potential environmental effects arising from the plan change. These matters are considered below:

6.1 Location outside the Urban Limits

The site to be rezoned adjoins the Urban Limits in the Hornby/Islington area. The land already contains around 34 residential dwellings and 5/6 life style sites and adjoins an active Commercial Local Zone containing eight local shops (intersection of Marshs Road/SHNo1) a small reserve (Islington) and faces across Marshs Road in the Selwyn District Council and in particular the premises of Harvest Centre farm equipment (Refer Fig 4 over).

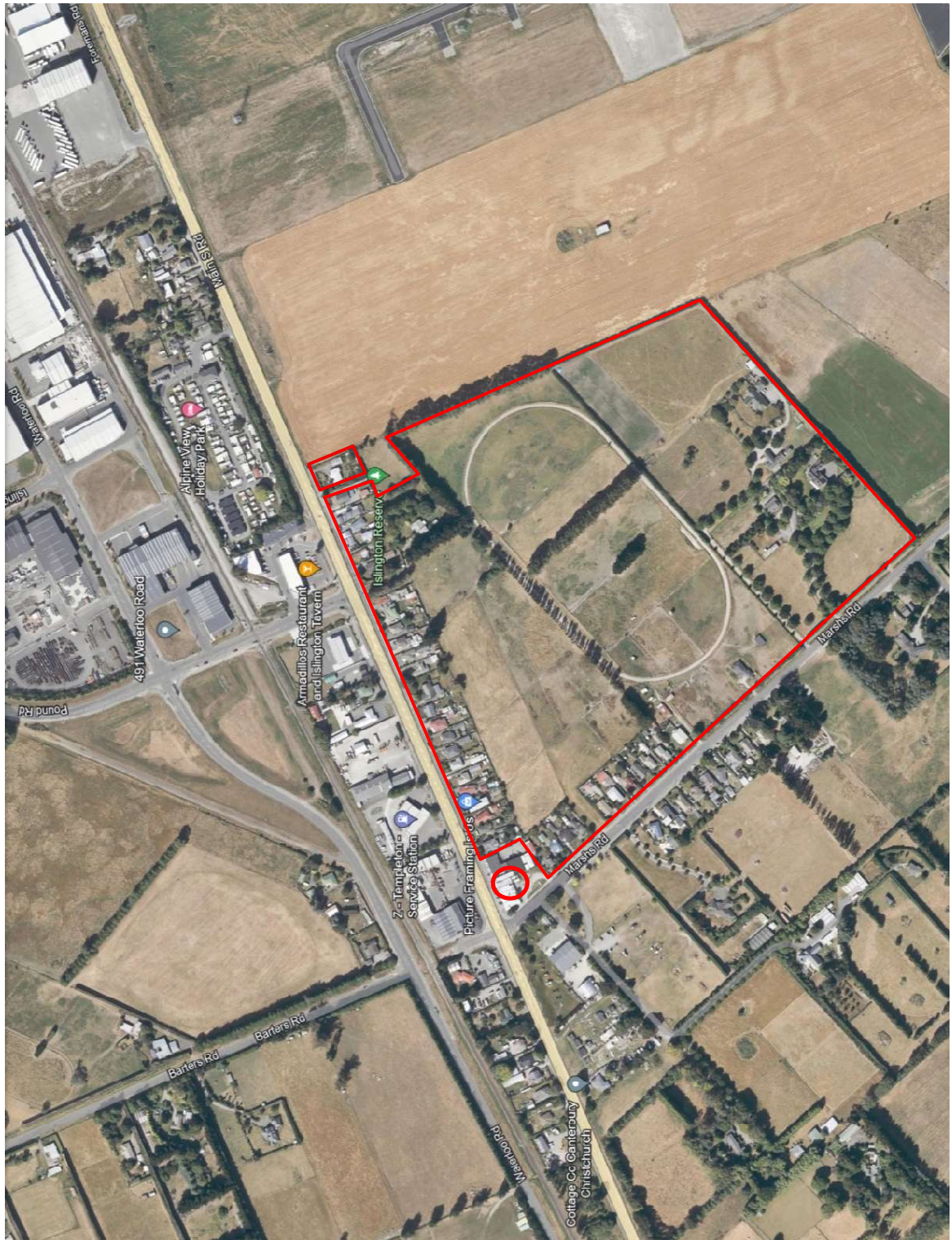
The north boundary of the “site” fronts and adjoins the major light controlled and realigned intersection of Pound Road and SHNo1 and abuts Industrial Heavy Zoning on both the east and south boundaries. The subject land is generally dominated by Industrial Heavy Zoning which has either been developed or is in the process of being developed, as well as a range of other urban zones and major traffic routes. In addition, the land is able to be serviced and generally sits within and alongside a highly accessible location in terms of business/industrial activity in the Hornby Christchurch area (Refer Annexures B and C).

It will provide for consolidated urban-industrial activity and deliver a more efficient and economic transport outcome for the area. Both Marshs Road and SHNo1/Main South Road provide strong definitive boundaries to the IH zoning at Hornby.

The overall conclusion is that a number of factors support the rezoning proposal outside of the urban limits/infrastructure boundary. These are:

- The land immediately adjoins the IH zone on two sides. The remaining two frontages provide major business traffic links within the wider city and Hornby.
- The land has no agricultural value (Refer Annexures I and J)
- The land can be serviced.

- Both Marshs Road and SHNo1 provide definitive boundaries to the IH zone in the area.
- It maintains and supports a compact urban and industrial growth outcome.
- Removes the need to upgrade the Marshs Road/SHNo1 intersection and provides for a much improved industrial road network and intersection with SHNo1 in Hornby/Islington
- It is located within one if not the most preferred industrial areas in Christchurch (Refer Appendices B and C).
- The industrial land projections and economic assessments support the need for and value of more industrial land in this locality.
- It will provide for the completion of the minor Arterial road link between Shands Road and SHNo1, and
- Is located alongside (Map A) the urban boundary of the Regional Policy Statement.



Locality

Fig 4

Harvest Farm Machinery



6.2 Industrial Land Growth Estimates

The creation of additional zoning over a small block of land will enable the provision of a range of site sizes and industrial activity and provide additional choice for business. Given the proximity of the site to numerous synergistic business activities, living and community facilities it is an appropriate zoning in this location (Refer Annexure B).

With regard to the supply of industrial land, over the past decade the Shands/Hornby locality has seen strong growth and the various demand/supply estimates would appear to confirm the growing demand (City and Hornby wide) with some estimates indicating there is an opportunity for additional industrial land that is commercially feasible. The overall estimates are set out below.

Industrial Land Growth Estimates

Table 20: Vacant Industrial Land by Zone in Christchurch

Industrial / Specific Purpose	Vacant (part)	Vacant (whole)	Total (ha)
Industrial			
Commercial Mixed Use Zone	2	4	7
Industrial General	86	122	209
Industrial Heavy	160	197	358
Industrial Park	71	22	93
711 Johns Road (future potential)			
Hawthornden and Russley Road (future potential)			
Industry Total	319	345	667
Specific Purpose			
Specific Purpose Airport (Development Precinct) Zone	96	16	112
Specific Purpose Total	96	16	112
Christchurch Total	415	361	799

Source: CCC

The most preferred suburban industrial area in Greater Christchurch is Hornby South and the adjacent Islington. This area of the city is the premium logistics warehouse location due to its strategic position adjacent to the major road and rail arterials both north and south, and also proximity to Christchurch City and Christchurch International Airport. The next preferred location is Rolleston.

The conclusion reached by the applicant in terms of industrial land supply is summarised in Annexure C as follows;

Industrial Land Supply

The Colliers Vacant Land Survey (CVLS) quantifies the current vacant land supply in Christchurch City at 514.1ha, and in the Greater Christchurch area including Waimakariri District and Selwyn District at 772.8ha.

Industrial Land Take-up

The Christchurch City Council Vacant Land Register (CCC VLR) over a 20 year period produces a confusing land take-up pattern which in part is explained by rezoning events which provided sudden increases in supply. It is difficult to gauge the long term average take-up, however utilising the results from 2018 to 2022, the average take-up for the last four years was at or about 58.1 ha pa within the CCC boundary. Average take-up over the last two years increased to 84.0 ha pa.

Industrial Land Market Overview

There is now only a limited supply of vacant industrial land across the Greater Christchurch area with this diminishing supply resulting in significant land price escalation over the last two years where land values have increased by as much as 50% over this period.

We have completed analysis to predict how long the existing zoned vacant industrial lands supply in Greater Christchurch will last utilising analysed take-up in the Greater Christchurch area. Excluding land owned by HMQ (19.2ha), CCC (22.8ha) and Ecan (26.0ha) and adopting an average annual take-up of 62.2 ha, indicates there is sufficient supply for 11.3 years.

We have also completed the same analysis on the preferred industrial area of Hornby South and Islington which is the premium logistics warehouse location due to the strategic position adjacent to major road and rail arterials to the north and south, and also proximity to Christchurch City and Christchurch International Airport. The vacant land supply in this location excluding land owned by HMQ is 164.2 ha. Adopting a take-up of 23.3 ha pa indicates there is sufficient supply for 7.1 years.

Even though our analysis of the remaining supply of land in Hornby/Islington of 7.1 years appears reasonably tight, in actual fact, real supply is likely to be significantly less. This explains why there has been rampant land value escalation during the last two years of up to 50%.

Analysis of industrial land take-up in Hornby South and Islington is outlined as follows:

Hornby South & Islington Supply Summary			
Suburb	2020 ha	2023 ha	Take-up
Hornby South	179.8	142.6	37.2
Islington	45.6	36.2	9.4
Total	225.4	178.8	46.6

Over the last two years, the industrial land take-up in Hornby South and Islington was 46.6 ha which equates to 23.3 ha/pa. In order to measure how long the land supply in Hornby South and Islington will last, we have excluded the land owned by Her Majesty The Queen in Hornby comprising 14.6ha, which is currently considered to be essentially unusable. Therefore the net vacant land available in Hornby and

Islington reduced to 164.2ha. Adopting an analysed take-up of 23.3 ha/pa indicate there is sufficient supply for 7.1 years.

All of the analysis in this report produces the most optimistic picture because the over-riding assumption is that all vacant land is available for sale and/or development. This is clearly not the case. In many cases, land is either not available for sale or being held for further development expansion.

Even though our analysis of the remaining supply of vacant land in Horby/Islington of 7.1 years appears reasonably tight, in fact, real supply is likely to be significantly less. This explains why there has been rampant land value escalation during the last two years of up to 50%.

The outcomes and findings of the Economic Report and the Industrial Land Supply Assessments are accepted and it is concluded that the outcome of the proposed Plan Change will at worst be neutral, but more likely positive.

6.3 Economic Impact

Following on from above an assessment of the Economic impacts and benefits of the proposed rezoning was undertaken by Property Economics Ltd (Refer Annexure B). That report identifies that the development is an example of a plan change that could be considered as unanticipated in terms of Policy 8 of the NPS-UD being;

“Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:

- *Unanticipated by RMA planning documents; or*
- *Out-of-sequence with planned land release”*

but is nevertheless a logical and economically appropriate land use that contributes to a well-functioning urban environment for a number of reasons. In summary these are:

- Availability of all infrastructure services,
- Close proximity to the transport network,
- Proximity to a labour supply,
- Room for expansion,
- Level of traffic accessibility,
- Adjacent to the existing IH zone,
- Will not undermine the existing vacant industrial land capacity, and
- Any adverse environmental effects can be mitigated

The outcomes are supported in the assessments undertaken in Annexures B, C D, E and F.

6.4 Landscape and Visual Effects

The land subject of the proposal is currently a mix of low level grazing, 34 residential dwellings on lots averaging around 800m² and a limited number of rural/lifestyle lots. Changing the zoning will alter the character of the site although this does not mean that adverse effects must result. The land is already a combination of urban/residential and low level rural activity and is currently zoned Rural-Urban-Fringe zoning which anticipates a number of urban type activities. The interface between the rural and industrial zones (or rural and urban use) will be extended to the Marshs Road/SHNo1.

A Landscape and Visual Effects Assessment of the proposed Plan Change has been undertaken by RMM Ltd, and is attached in Annexure D. That assessment considered the existing landscape character of the environment and the potential visual/amenity impacts of the proposed rezoning. The assessment was undertaken from multiple reference points.

In addition the plan change has been designed to stage the extent and impact of the I.H. Zone on the exiting residential neighbours within the block. In particular it provides for:

- (i) A 20m additional building setback from the existing residential dwellings on Main South Road and Marshs Road for a 10 year period,
- (ii) 10m wide landscape setbacks on road frontages

The Landscape and Visual Assessment concludes that:

While the proposed Heavy Industrial Zone will result in a change to the existing character of the site, when considering the surrounding context of the receiving environment, the rezoning of the site will be a logical extension of the industrial area northeast of Marshs Road and southeast of Main South Road. This is because the industrial development enabled by the PPC will be in keeping with and form a cohesive and integrate extension to the existing and anticipated industrial development within the receiving environment. Also, because industrial development is synonymous with the character of the area.

The assessment of visual effects has identified a range of potential adverse effects from very low to moderate. It is only the residential properties within and adjacent to the site which will experience a low-moderate or moderate degree of adverse visual effects. Ultimately this will depend on the residents within the site who may choose to sell and / or vacate their properties prior to any development occurring.

Additionally, due to potential CPTED issues in relation to the existing reserve, RMM recommends that the ODP consider a wider pedestrian accessway off

Main South Road and an internal pedestrian or road connection to the reserve within the ODP area, and buildings be designed to provide passive surveillance over the reserve. The adoption of these recommendations will enhance the amenity of this reserve.

*When considering the interrelated physical, perceptual and associative values the industrial development enabled by the PPC, they will result in a **low to low-moderate** degree of adverse effects on landscape values, with a range of beneficial outcomes including a more user-friendly reserve space and a well-connected strategic road network.*

In the long term, it is likely that the industrial development will replace the residential properties within the site, and therefore, will only be seen by the residents along the southwest side of Marshs Road. In this case, industrial development will appear consistent with what is anticipated along the majority of the road, with an appealing roadside strip screening the bulk of development, and buildings being setback at least 10m from the edge of Marshs Road, or 40m from these properties. Noting that farm buildings within the RuUF Zone can be up to 12m tall and setback 30m from Marshs Road. Therefore, they will not overly dominate the view, in particular from the backyards of these properties where most outdoor living occurs.

*Taking into consideration all of the above, prior to the removal of residential development future development enabled by the PPC will have a **low-moderate degree** of adverse visual effects on the residential properties along both Main South Road and Marshs Road. Once these residential properties are removed, future development enabled by the PPC will have a **low-moderate to moderate degree** of adverse visual effects on the residential properties along Marshs Road.*

Landscape Summary

To summarise the above, the visual effects resulting from the proposed are as follows:

- *Main South Road – A **very low** degree of adverse visual effects.*
- *Islington Reserve – It is recommended that the ODP includes a wider accessway off Main South Road and an internal pedestrian or road connection to the reserve within the ODP. Also, that buildings are designed to provide passive surveillance over the reserve. These recommendations will enhance the amenity of the reserve.*
- *Marshs Road:*
 - a. *Future development enabled by the PPC that is southeast of the residential development will have a **low degree** of adverse visual effects*
 - b. *Future development that is located behind and / or will replace the residential properties along Marshs Road will have a **low to low-moderate degree** of adverse visual effects (Refer Annexure D)*
- *Meadowlands Road – A **low** degree of adverse visual effects.*

- *Residential Properties:*
 - a. A **low-moderate degree** of adverse visual effects on the residential properties along both Main South Road and Marshs Road.

6.5 Water Quality

Re-zoning of rural land to industrial use has the potential to impact ground and surface water quality. This situation arises from on-site effluent treatment and disposal of stormwater generated from increased impervious surfaces. As set out in Annexure D the development will be fully reticulated for effluent disposal with connections to the Councils sewerage as set out below (Refer Annexure D).

Stormwater will be treated by a new facility in Phase 2 of the subject (adjoining) land and consists of a first flush facility and rapid soakage chambers. The site has the ability to treat and dispose of stormwater (within its boundaries)

Through consultation with CCC it is expected that stormwater will be treated and disposed of under CCC's global CRC190445 in the following ways:

1. *It is assumed 40% of Lot coverage will be roof area. The flows off the roof will be disposed of to ground via on site rapid soakage chambers. These are to be sized to attenuate up to and including the critical 2% AEP storm event*
2. *The remaining 60% of Lot coverage is assumed to be car parking and landscaped areas which will be pipe to the mains in the road and discharge to the first flush, retention and disposal facilities.*
3. *Pipes in roads are sized to accommodate the 20% AEP to the stormwater facilities.*
4. *All overland flow from the Lots and roads is to be conveyed towards the stormwater facilities for treatment and storage of up to and including the 2% AEP critical storm event.*
5. *Redundant soakage and storage of the 10% AEP 18 hour storm will be provided*
6. *Any storms exceeding the critical 2% AEP will over top the facilities and discharge to Marshs Road.*

Secondary flow paths within the site will follow the road network. All roads are graded to convey the secondary flow towards the south eastern corner of the site where the proposed basins are located.

Stormwater disposal should not hinder this land being rezoned Heavy Industrial.

6.6 Neighbouring Activities and Potential Reverse Sensitivity Issues

Reverse sensitivity as a concept, although not specifically referred to in the Act, has been recognised as an effect that can validly be considered. In *Auckland Regional Council v. Auckland City Council* the Environment Court defined reverse sensitivity as:

“The term refers to the effects of the existence of sensitive activities on other activities in their vicinity, particularly by leading to restraints in the carrying on of those activities.”

The current activities on the adjoining sites outside of the subject block vary from commercial (local retail) on the north-west corner of the site and a major retail/servicing complex for farm equipment (Harvest Centre) located on the south side of Marshs Road at the intersection of that road and Main South Road. A group of 12 dwellings (average lot size 800m²) are located facing Marshs Road opposite the site and generally located 200m from the Marshs Road/SHNo1 intersection. A further group of houses (approx. 24) are located within the proposed zoning on the north side of the site (SHNo1). A small Council reserve (Islington Reserve) is located at the north east corner of the site and accessed from SHNo1. The reserve is zoned Open Space P.

The land on the west and south boundaries of the site is zoned IH and is currently either being developed or has been developed for industrial activity. Across SHNo1 to the north the land is zoned Industrial General and is now developed for commercial activities.

The neighbourhood is not a traditional rural environment but rather an area in transition from rural to urban. This is reflected in a number of matters including:

- The rezoning of the land from Rural to Rural Urban Fringe,
- The existence of some 40 residential/rural-residential dwellings within the rural area/zoning of the site,
- The surrounding industrial Heavy and Industrial General zoning and adjoining consented industrial activities (Harvest Centre),
- The establishment of the new retail, business, service station activities opposite the site on SHNo1,
- The redevelopment of the arterial road network in the area which would see the plan change land providing for the last stage of a new minor arterial link between SHNo1/Pound Road and Shands Road. This will reduce traffic on Marshs Road, remove the need for the upgrading of the Marshs Road/ShNo1 intersection and the outcome should be an improvement to the amenity of any facing rural or residential properties, particularly when the number of access points to Marshs Road is reduced, the increase in landscape requirements along the Marshs Road frontage and the reduction in HGV traffic on Marshs Road.

6.7 Lighting

In respect of lighting any future development of the site will be subject to the existing Industrial Heavy Zone rules that provide for a maximum permitted light spill of 20.0Lux (vertical or horizontal) at the notional boundary of any adjoining site within the IH Zone. Any future development will implement mitigation measures such as light suppression measures and directional lighting, as required to achieve compliance with the lighting rules and to minimise glare and light spill. The existing

rules are therefore considered to be appropriate. The current applicable provisions are set out as follows;

6.3.6 Rules – Light Spill Standards by Zone

- a. *The added horizontal or vertical illuminance from the use of artificial outdoor lighting must not exceed the limits in the following table of light spill standards by zone, when measured or calculated 2 metres within the boundary of any adjacent site.*

Table 6.3.6.1: Light Spill Standards by Zone

Zone or scheduled activity		Permitted lux spill (horizontal or vertical)
vi	Industrial zones, all other	20.0

6.8 Noise

In respect of noise the development of the site will be subject to the existing Industrial Heavy Zone rules which include specific noise standards applying at any point within the boundary of any site. Those standards are deemed appropriate to protect rural residents from unacceptable noise effects within their properties, arising from the Plan Change site. The current applicable rule is set out as follows:

Zone of site receiving noise from the activity	Time (hrs)	Noise Limit (dB)	L _{max}
<i>n. Industrial Heavy Zone</i> <i>Except that noise levels shall not exceed 50 dB Leq/75dB L_{Amax} at any residential unit lawfully established prior to 6 March 2017 during the hours of 22:00 to 07:00</i>	07:00-22:00	75	n/a
	22:00-07:00	75	n/a

6.9 Natural Features

There are no significant natural features within the proposed Plan Change Area. (Refer Annexure E)

6.10 Street Planting plan/swales

Re-zoning of land from rural to industrial will not impact the ground water quality or adversely impact planting opportunities (Refer Annexures D and E).

6.11 Transportation

6.11.1 Roading Layout

The ODP (South West Hornby Industrial Area – Appendix 16.8.1) provides for a minor arterial linking from Shands Road through to the south-east corner of the subject (proposed plan change) site. The first stages of this link and the upgrade of the intersection between the minor arterial and Shands road (light controlled) have already been undertaken.

The transport route extension (minor arterial) and the linkages that provides will be one of the major advantages and outcomes of the plan change. A detailed Transport Assessment has been carried out by Stantec Ltd (Refer Annexure G) with the transport benefits being:

- *Connecting the proposed new Minor-Arterial road within the plan change area to SHNo1 and providing a more connected road network for the wider community. This will result in shorter travel distances and time savings,*
- *It will provide a more attractive and safer parallel route (north/south) between SHNo1 and Shands Road, than does Marshs Road,*
- *It will reduce the impact of traffic on the amenity of Marshs Road,*
- *That the land (plan change site) would all be assessed internally, ie there will be no direct vehicle access to SHNo1 or Marshs Rd,*
- *That the intersection (SHNo1/Pound Road) will be upgraded to provide space for a fourth leg at the SHNo1/Pound Rd (Refer Annexure G),*
- *The site is close to the proposed South Express Major Cycleway making it accessible to nearby residential activity and new roads within the development will be able to accommodate footpaths and shared paths connecting to existing footpaths,*
- *It is understood that the Council has allocated money for a Main South To South West Hornby Link in 2027/28, presumed to be the road link through the Plan Change Site (Annexure G).*

6.11.2 Site Access

As set out above safer access will be provided to the land with the number of access points being reduced from around 40 to 2 or 3. Marshs Road is classified as an Minor Arterial road, SHNo1 as a Major Arterial road, Shands Roads as a major Arterial Road and Pound Road as a Minor Arterial. All of the existing residential access points to SHNo1 and Marshs Road will be removed on termination of the residential activity.

6.11.3 Trip Generation

The transport assessment (Refer Annexure E) has assessed the traffic generation at the end of the development of the site at approximately 200vph. The assessment concludes that by connecting the new Minor Arterial road to SHI provides:

- *A more connected road network with travel distance and time savings across the model area,*
- *There will be a reduction in traffic use on Marshs Road and the removal of right turns in and out of Marshs Road,*
- *There should be a reduction in traffic volumes on Halswell Junction Road, and*
- *That the SHNo1/Pound Road intersection would continue to operate at the same level of service.*

6.11.4 The Surrounding Roads

A summary is set out below (Refer Annexure F)

A summary of the traffic modelling results is presented here, with detailed outputs reported in the Transport Modelling Report.

A key observation from the traffic modelling exercise is that connecting the new Minor Arterial road into SH1 provides a more connected road network for the wider area. This results in travel distance and travel time savings across the model area. This is especially noticeable in the evening peak period, when average travel times to / from zones in the industrial area are approximately 10% lower and average travel distances are 6% shorter.

There are plots in the modelling report showing changes in traffic volumes on the surrounding roads with the Plan Change site developed. Most notably, they show reductions in traffic volumes on Marshs Road and Halswell Junction Road.

The reduction in traffic use of Marshs Road is expected since the turning movements at the SH1 intersection are restricted in the model and the new Minor Arterial road provides a more attractive parallel route once connected at SH1. Removing right turns into and out of Marshs Road at SH1 will address safety concerns with the existing intersection, while reducing traffic volumes on Marshs Road will also have benefits given the rural section of the road is not formed to an arterial road standard.

The reduction in traffic volumes on Halswell Junction Road will take some pressure off key intersections along that road, such as the Shands Road intersection, which are forecast to be operating with relatively high delays in the future.

Traffic modelling outputs for the key intersections in the area show that most intersections will perform similarly with the Plan Change site developed.

*The SH1 / Pound Road intersection performance is similar with and without the Plan Change site developed in the morning peak. In the evening peak, when traffic volumes in the area are higher, there are some increased delays but **Calder Stewart Development Ltd** // Hornby Quadrant Plan Change Integrated Transport Assessment 14 overall the intersection would continue to operate with a level of service D. It is considered that this is an acceptable overall performance for an arterial road intersection and the wider area connectivity / efficiency benefits outweigh any concerns in this location.*

6.11.5 Safety

The crash history (2017/2021) in the area is concentrated on the SH1/Marshs Road intersection. Four crashes have been reported but the crash history does not suggest a safety concern but rather safety concerns regarding priority intersections on high volume roads. No major safety concerns were identified at the SH1/Pound Road intersection.

6.11.6 Cycling and Public Transport

The Integrated Transport Assessment (Annexure G) sets out that site is located close to the proposed south Express Major Cycleway making it accessible from nearby residents. In addition:

- *New roads in the Plan Change will be able to accommodate footpaths/shared paths connecting to existing footpaths/shared paths,*
- *The existing bus stops on Waterloo Road east of the Pound Road area within an acceptable walking distance,*
- *The new Minor Arterial road would be capable of accommodating a bus route, and*
- *The new Minor Arterial road connection to SH1 will also make the adjacent industrial areas more accessible for non-car travel.*

6.11.7 Intersection Assessment

The outcome of the Plan Change will provide for the fourth leg at the SH1/Pound Road intersection. The preliminary design (concept) is provided in Annexure G and will result in significant traffic benefits for the area including increased safety at the Marshs Road/ SH1 intersection.

6.11.8 Summary of Traffic - Proposed Plan Change

The proposed 'minor arterial' link Shands Road/Main South Road (or completion thereof) will create a well-integrated road network in the area.

The Transport Assessment in Annexure E has set out the outcomes in its conclusion. This refers:

"The proposed Plan Change would see the last small corner of the land to the south-east of the SH1 / Marshs Road intersection zoned for industrial use, consistent with the surrounding zoning. It is considered a logical completion of the industrial area and rezoning will have a number of transport-related benefits as outlined in this report.

Development of the site will allow for the new Minor Arterial road between Shands Road and SH1 to be completed. The connection to SH1 opposite Pound Road will provide a more connected road network for the wider area. It will result in reduced travel distances and times in the wider area and improved accessibility to the neighbouring industrial areas by non-car travel modes; notably cycling from the major cycleway and walking from the bus stops both on Waterloo Road.

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 traffic modelling indicates that the SH1 / Pound Road intersection will be able to operate acceptably during peak times with the fourth leg added. The existing lane arrangements on SH1 and Pound Road will be able to be retained, with a right turn lane added on the western SH1 approach within the existing median. A preliminary concept design suggests that property will be required from the lot to the east of the intersection but may not be required from the lot to the west.

It is concluded that development enabled by the proposed Plan Change and the Minor Arterial road connection to SH1 will provide a range of transport-related benefits and there are no transport-related reasons that re-zoning should not be approved.”

6.12 Natural Hazards

A Geotechnical Investigation Report for the site has been prepared by CGW consulting Engineers (Annexure H). That assessment sets out that the ground is generally flat with minor undulations. The site specific investigations comprised sixteen machine excavated Test Pits with associated Dynamic Cone Penetration tests. In summary:

- *Ground water was not encountered within the machine excavated test pits,*
- *That based on the site investigations and the sites BMIE classification, and subject to some additional testing, the liquefaction risk is low and likely consistent with a TC1 technical classification,*
- *The site is not located within an identified active fault hazard zone,*
- *Slope instability can be discounted, and*
- *The site is not mapped within a Flood Management Area.*

Overall the conclusion of the Assessment (Annexure H) was that the land was suitable for the proposed re-zoning.

6.13 Soil Contamination

Preliminary and Detailed Site Investigations into the potential for soil contamination have been undertaken for the various properties contained within the Plan Change site. These were carried out as required by the Ministry for the Environment’s Contaminated Land Management Guidelines No 1: Reporting on Contaminated Sites in New Zealand, 2011. This investigation, which was undertaken by Pattle Delamore Partners Ltd and is contained in Annexure E to this Plan Change request and considered the following information:

- Review of Christchurch City Council property information provided in a LIM
- Obtaining ECan data from the Listed Land Use Register (LLUR)
- Review of ECan GIS data
- Review of historical ownership history
- Review of local knowledge of site history
- Site visit

The conclusion of the assessment is summarised as follows:

In summary, the available historical information for the overall site shows that it was in pasture or used for cropping activities from at least 1941 (earliest arterial image). Residential development progressively occurred along the northern site boundary (Main South Road) and along the northern part of Marshs Road. The six largest properties associated with the proposed plan change (occupying

approximately 19.5ha), predominantly comprised paddocks used for grazing livestock, a horse training track, a reserve, and rural residential properties.

Through the process of this review, HAIL activities have been identified to have occurred within parts of the overall site, as follows:

- HAIL reference G5 – Waste disposal and uncontrolled or imported fill (ie located at 679 Main South Road, 53 Marshs Road, 689 Main South Road and 27 Marshs Road).*
- HAIL reference G4 – Tyres, multiple storage containers and cars in varying states of condition at 693 Main South Road.*
- HAIL reference I – The potential of asbestos containing building materials and/or lead-based paint used for any structures (ie dwellings, garages or sheds) constructed prior to 2000 (ie this is to be determined via post demolition surveys).*

The site history information has shown that a large percentage of the site was in the ownership of Wattie's and used for general cropping purposes. It is important to note that general cropping is not classified as a HAIL activity (ie HAIL reference A10) and there is no evidence to indicate that intensive cropping occurred that required the application of persistent pesticides. Likewise, the presence of "residential" scale glass houses identified at some of the properties do not constitute a HAIL activity (ie Hail reference A10).

Based on a review of the available site history information, due to the presence of identified HAIL activities over parts of the site, a potential risk exists to human health (albeit a low risk noting the proposed change in land use to commercial/industrial). As such, resource consent will be required following the completion of the plan change process and for activities covered by the NESCS (ie land use change, subdivision and/or soil disturbance).

Whilst noting the above applicability of the NESCS, there is no reason from a site contamination perspective why the proposed plan change from Rural Urban Fringe Zone and Open Space Community Parks Zone to an industrial zone for the approximate 23ha site cannot proceed.

6.14 Versatile Soils

The site generally contains Class LUC2 soils. Therefore the site soils are 100% HPL in terms of the NPS-HPL. Within the last 50 or so years the site has been used for grazing some cropping and residential activity. Industrial development will inevitably involve increased building and hard surface coverage, recognising that there is potential to retain some limited use of the soils through planting, grassed areas and land drainage (swales, soakholes etc.) within individual properties. The assessment of the site (Annexures I and J) Agricultural Report concluded:

- a. The site is not considered to be HPL under Clause 3.4 of the NPS-HPL due to its location, sizes, quality and other multiple constraints*
- b. There site will not support primary production activities.*

- c. *In light of these constraints, the overall benefits of retaining this land for primary production are negligible. That is especially given:*
- i. *There are no other rural sites within the same locality that have lower productive capability or less constraints than Calder Stewart's site.*
 - ii. *The proportional reduction in HPL in the district and the region as a result of the rezoning of the Site are insignificant.*
 - iii. *The servicing of the Site has been factored into the services already provided for within The Hornby Quadrant development adjacent to the site.*
 - iv. *The Site is fragmented being comprised of 40 lots and is isolated as defined in Clause 3.4 of the NPS-HPL.*

6.15 Positive Outcomes

The provision of a significant development area that will create a range of business lots of varying sizes with commensurate affordability within the Islington/Hornby area is considered to be a significant economic benefit. It also makes more efficient use of the land resource in a very desirable industrial locality, with easy access to Christchurch businesses, the main road network and locations/activities further south. Overall the rezoning would result in a number of benefits:

- The availability of business sites in a “business” locality,
- An increase in the availability of sites in a business land environment that is assessed as becoming tight,
- A significant improvement in the arterial road network and accessible to all modes of transport,
- Close to a labour market and community facilities, and
- Reflects an industrial growth outcome anticipated by Policy 8 of the NPS-Urban Development;

Policy 8:

Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:

- (a) Unanticipated by RMA planning documents; or*
- (b) out-of-sequence with planned land release*

7. National Policy and Plan Framework

7.1 National Policy Framework

- Part 11 of the RMA
- NPS Urban Development
- NPS Highly Productive land

7.2 Part II of the Resource Management Act

Part II of the Resource Management Act defines the purposes and principles of the Act, which are the overarching matters that should be taken into account in preparing policy statements and plans and when considering a resource consent application. In terms of this request for a plan change it is considered that the most relevant sections of Part II are sections 5 and 7.

5 *Purpose*

- (1) *The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) *In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while—*
 - (a) *Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
 - (b) *Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
 - (c) *Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

7 *Other matters*

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

...

(b) The efficient use and development of natural and physical resources: ...

(c) The maintenance and enhancement of amenity values:

...

(f) Maintenance and enhancement of the quality of the environment:

The proposed industrial zoning provides for the efficient and sustainable use of the land resource, in that it is an expansion of the industrial development at Hornby in a location that can provide for a wide range of business opportunities. This increase in Industrial zoning at Hornby will enable the social and economic wellbeing of the community to be maintained and enhanced.

The amenity of the current rural neighbours has been taken into account in developing the Outline Development Plan. This includes providing future connecting roads and services throughout the rezoned block which will reduce the traffic impact on Marshs Road and remove all access points to Marshs Road. The integration of the subject land is assured through the development being in accordance with the ODP for South-West Hornby. This ODP provides for connections with the principle road network which are part of this rezoning request. In addition the development will be undertaken in two stages with:

- No site access from Marshs Road,
- Major buildings to be set back 20m from Marshs Road,

- The set back is to contain 6m height trees parallel to Marshs Road,
- No site access from Main South Road,
- That a 20m setback is to be provided to the rear boundary of the residential lots for a maximum period of 10 years,
- That there is to be a 20m wide building setback from the residential properties, and
- All exterior lighting is to face the industrial zone away from the existing residential properties

The balance required under Part II, has been achieved through a comprehensive approach to the design of the existing and developing Hornby industrial area and the proposed rezoning will extend that outcome and provide for a range of lot sizes and opportunities.

7.3 National Policy Statement on Urban Development

The **National Policy Statement on Urban Development (NPS-UD)** came into effect on 20 August 2020, providing direction to decision-makers under the Resource Management Act 1991 in respect of planning for urban environments. The Policy Statement replaces the National Policy Statement on Urban Development Capacity 2016 (NPS-UDC). The NPS-UD recognises at a national level the significance of well-functioning urban environments. In particular the Objectives of the NPS-UD seek the following:

- *Objective 2 - Urban environments that provide for the social, economic and cultural well-being and for their safety now and in the future*
- *Objective 3 - Regional policy statements and district plans enabling more people to live and more businesses to be located in areas of and urban environment near centres or areas with employment opportunities, well serviced by public transport and there is a high demand for business land in the area relative to other areas within the urban environment,*
- *Objective 4 – Recognise that urban environments develop and change over time in response to the diverse and changing needs of people, communities and future generations,*
- *and that Objective 5 - local authority decisions on urban development are integrated with infrastructure planning and strategic over the medium term and long and supply significant development capabilities.*

The main tool to achieve these objectives is a Future Development Strategy (FDS) which has the purpose of achieving well-functioning environments in existing and future urban areas and to provide at least sufficient development capacity over the next 30 years to meet expected demand.

At present there is no FDS for the greater Christchurch Area although the Evaluation report for the Greater Christchurch Spatial Plan (Urban Form Scenarios) has been undertaken. This report is at a high level but does identify the Hornby locality as a

major growth centre and a likely location (Hornby) as a centre for new/expanded industrial areas.

The projected re-zoning will achieve the applicable policies of the NPS-UD as follows.

Policy 1 – Planning decisions

The requested rezoning with an accompanying ODP provides the Christchurch City Council with a mechanism to make planning decisions that enable a variety of industrial activities on lots adjoining an established business environment and in turn support local amenities and services. In addition there is easy and integrated access to main roads and the road network for travel to work. The size of the plan change area provides for a variety of sites sizes which in turn provides a choice of business opportunities in Hornby/Islington.

The Economic analysis by Property Economics and the Industrial Land Supply Assessment (refer Annexures B and C) conclude that the demand for industrial opportunity in Hornby over the last decade has been strong. There is also a conclusion that there is a need for additional land in Hornby to be available to meet demand and in particular to provide for a range of lot sizes and prices.

With regard to location, the economic analysis concludes that this land is one of the few opportunities for development in the city where due to its size and location can directly integrate with the existing urban area.

In terms of resilience and climate change, then the best manner by which this can be achieved within new urban development is through reduced greenhouse gas emissions. This plan change request supports reduced greenhouse gas emissions through a consolidated urban form, proximity to community infrastructure and reduced reliance on motor vehicle travel as detailed below.

Consolidated Urban Form

The proposed development area lies alongside of but adjoins a “preferred urban growth” area in terms of Future Greenfield business development in Hornby. It achieves a consolidated expansion of the urban area and has the potential to enhance urban industrial critical mass that supports the extension of public transport services. The Economic and Land Supply Assessments (Annexures D and E) conclude that the proposed block is in an efficient location for new development because it can directly integrate with the existing urban area.

Proximity to Community Infrastructure

The proposed plan change area is located in close proximity of significant community infrastructure including public transport:

- A major employment hub at Hornby/Islington,
- Easy access to the regional road network and national motorways,
- Access to major bus routes,
- The shopping centres of Hornby/Riccarton, and
- Local community services

Reduce Reliance on Vehicle Travel

Public transport services for Hornby residents and the surrounding area will be consolidated by the outcome of this zoning change. The transport assessment has concluded (Refer Annexure E).

The site is located close to the proposed South Express Major Cycleway making it accessible from nearby residential suburbs.

New roads within the Plan Change site will be able to accommodate footpaths / shared paths connecting to existing footpaths / shared paths in the surrounding industrial areas. A continuation of the shared path along the new Minor Arterial road would be expected through the Plan Change site.

The existing bus stops on Waterloo Road east of Pound Road are considered to be within an acceptable walking distance of the Plan Change site, making developments within the site accessible by bus. Bus routes respond to demand and while they do not tend to run through industrial areas, the new Minor Arterial road would be capable of accommodating a bus route in the future.

The new Minor Arterial road connection to SH1 will also make the adjacent industrial areas more accessible for non-car travel, allowing for more direct walking and cycling connections to / from the cycleway and bus stops on Waterloo Road.

It is concluded that development of the Plan Change site will be appropriately connected to the surrounding area for non-car travel considering its industrial nature and will improve the accessibility of the surrounding industrial areas.

Conclusion

The aforementioned factors are inherent in the proposed rezoning in South-West Hornby and provide opportunities to reduce vehicle use and therefore greenhouse gas emissions.

Policy 2 - Sufficient development capacity

This policy requires local authorities to provide sufficient development capacity to meet expected demand for business land over the short, medium and long term. The proposed rezoning is expected to provide for the short and medium term. The Economic and Market Analysis in Annexures C and D conclude that there is or will shortly be a need for additional industrial land in this section of Hornby and this is in part confirmed by provisions of the CRPS, Policy 6.3.6 which indicates that efficient business land has only been identified through to 2028.

- *Promotes the utilisation and redevelopment of existing business land, and provides sufficient additional greenfield priority area land for business land through to 2028 as provided for in Map A;*

- *Recognises demand arising from the relocation of business activities as a result of earthquake damaged land and buildings;*
- *Recognises that new greenfield priority areas for business in Christchurch City are primarily for industrial activities, and that commercial use in these areas is restricted;*
- *Utilises existing infrastructure availability, capacity and quality;*
- *Ensures reverse sensitivity effects and conflicts between incompatible activities are identified and avoided or mitigated against;*
- *Ensures close proximity to labour supply, major transport hubs and passenger transport networks;*
- *Encourages self-sufficiency of employment and business activities within communities across Greater Christchurch; and*
- *Incorporates good urban design principles appropriate to the context of the development.*

The zoning of the proposed land will achieve all of these outcomes.

Policy 6 - When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to his National Policy Statement
- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:
 - (i) may detract from amenity values appreciated by some people but may improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and
 - (ii) are not, of themselves, an adverse effect
- (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)
- (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity
- (e) the likely current and future effects of climate change

This policy expects that from time to time local authority decisions would add significantly to development capacity even if the development is unanticipated.

Policy 8 – Responsiveness to plan changes

The policy requires local authority decisions to be responsive to plan changes that add significant development capacity and contribute to well-functioning urban environments even if the development capacity is not anticipated by current RMA documents or is out-of-sequence for planned land release. Having analysed the industrial land supply in Hornby and the popularity and significance of Hornby to Christchurch industrial growth and employment, and the assessments undertaken

by Property Economics and Colliers Ltd then the subject land would add significant development capacity and contribute to a well-functioning and urban environment.

7.4 National Policy Statement on Highly Productive Land

Until such time as the regional council's incorporate LUC classifications into their maps, district council's must still apply the NPS-HPL to land that is zoned rural general or rural production and has a LUC 1, 2 or 3 classification but is not identified for future urban development or subject to a rezone plan change.

It is recognised that in terms of Clause 3.5(7) of the NPS/HPL that the site is highly productive land. This clause is supported by clauses 3.8(1) - *Avoiding the rezoning of highly productive land* and 5.9 – *Protecting highly productive land from inappropriate use and development*.

The Government recently released the National Policy Statement for Highly Productive Land (NPS-HPL) to protect highly productive land from inappropriate subdivision, use and development and to ensure its availability for food and fibre production. The National Policy Statement came into force on 17 October 2022 and was amended in 2024.

The objectives and policies of the NPS-HPL are set out in **Table 2** below and an assessment against Clause 3.9 'Protecting highly productive land from inappropriate use and development' is provided in Annexures I and J.

Table 2.2: National Policy Statement Highly Productive Land Objectives and Policies

2.1	<i>Highly productive land is protected for use in land-based primary production, both now and for future generations.</i>
Objective	
Policy 1	<i>Highly productive land is recognised as a resource with finite characteristics and long-term values for land-based primary production.</i>
Policy 2	<i>The identification and management of highly productive land is undertaken in an integrated way that considers the interactions with freshwater management and urban development.</i>
Policy 3	<i>Highly productive is mapped and included in regional policy statements and district plans.</i>
Policy 4	<i>The use of highly productive land for land-based primary production is prioritised and supported.</i>
Policy 5	<i>The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement.</i>
Policy 6	<i>The rezoning and development of highly productive land as rural lifestyle is avoided, except as provided in this National Policy Statement.</i>
Policy 7	<i>The subdivision of highly productive land is avoided, except as provided in this National Policy Statement.</i>
Policy 8:	<i>Highly productive land is protected from inappropriate use and development.</i>
Policy 9:	<i>Reverse sensitivity effects are managed so as not to constrain land-</i>

based primary production activities on highly productive land.

Two provisions of the NPS-HPL are particularly relevant to an assessment of the Plan Change. These are:

Part 3 - Implementation; Clause 3.6(i)(a)(b) and (c) restricting urban rezoning of highly productive land and **Clause 3.10**, Exemption for highly productive land subject to permanent or long term constraints,

Clause 3.6 (HPL) sets out the circumstances where urban rezoning of highly productive land may be allowed being:

- (a) *The urban rezoning is required to provide sufficient development capacity to meet demand for business land to give effect to the NPS on urban development 2020.*

Comment

These provisions are further expanded on by Clause 3.6(2)(a), Clause 3.6(i)(a) is addressed in two of the Annexures, namely Annexure B (Property Economics) and Annexure C (Research report Industrial Land Supply Colliers Ltd).

In respect of clause 3.6(2)(a), greater intensification is more a residential criteria but in any event the rezoning does provide for greater intensification of HIZ land and consolidated in a primary industrial node. There is no other more reasonable or practicable options for maintaining development capacity in the same area.

In summary these two reports have concluded:

Annexure B – Economic Assessment

7. Summary

This report has outlined the key economic issues surrounding the proposal to rezone 23ha of rural land to HIZ on the urban fringe of Hornby, Christchurch.

The HBA released for the Greater Christchurch Area in 2018 shows that there is more than sufficient vacant industrial land to meet projected demand over the next 30 years. Although it has been around 5 years since this assessment, the level of sufficiency was such that the balance of industrial land sufficiency is unlikely to have changed materially in that time.

However, HBA sufficiency is not considered the primary consideration in this instance. HIZ land is difficult to rezone and service given the significant infrastructure requirements. The subject piece of land represents a small natural extension of an existing HIZ block that would provide significant infrastructure and serviceability efficiencies for HIZ activities. It is the last remaining area within a wider HIZ block, is

very well connected to key transport routes and is easily accessible to rail and the airport for domestic and international deliveries.

Property Economics considers the land to be a practical extension of the existing HIZ as it safeguards any incompatible activities being developed on the site that may affect the operations of the existing HIZ area.

Given the significant infrastructure investment developed around the subject site already for the existing HIZ provision it is not anticipated that the PPC would require a significant level of additional publicly funded infrastructure investment. As such the economic benefits of the PPC including agglomeration benefits, more competitive business location and land prices and market certainty would likely outweigh the economic costs.

Furthermore, the level of vacant industrial land available in the market means the site is unlikely to undermine the development timeframe of industrial areas in the Greater Christchurch wider market.

This is proceeded in the report (paragraph 6) by an assessment of the Economic Costs and Benefits. The benefits include:

- safeguards land from unsuitable development;
- enables Economics of scale and industrial agglomeration effects;
- efficient use of infrastructure; and
- potential for downward pressure on industrial land prices

Annexure C – Land Supply

This has addressed the supply and take up of industrial land in Christchurch, especially in Hornby South and Islington. The conclusion to this assessment is set out as follows:

Adopting a land take-up of 62.2 ha pa indicates there is sufficient supply for 11.3 years.

The most preferred suburban industrial area in Greater Christchurch is Hornby South and the adjacent Islington. This area of the city is the premium logistics warehouse location due to its strategic position adjacent to the major road and rail arterials both north and south, and also proximity to Christchurch City and Christchurch International Airport.

The next preferred location is Rolleston.

Analysis of industrial land take-up in Hornby South and Islington is outlined as follows:

<i>Hornby South and Islington Supply Summary</i>			
<i>Suburb</i>	<i>2020 Ha</i>	<i>2023 Ha</i>	<i>Take-up</i>
<i>Hornby</i>	<i>179.8</i>	<i>142.6</i>	<i>37.2</i>

<i>South</i>			
<i>Islington</i>	45.6	36.2	9.4
Total	225.4	178.8	46.6

Over the last two years, the industrial land take-up in Hornby South and Islington was 46.6 ha which equates to 23.3 ha pa. in order to measure how long the land supply in Hornby South and Islington will last, we have excluded the land owned by Her Majesty the Queen in Hornby comprising 14.6 ha, which is currently considered to be essentially unusable. Therefore the net vacant land available in Hornby and Islington reduces to 164.2 ha. Adopting an analysed take-up of 23.3 ha pa indicates there is sufficient supply for 7.1years.

All of the analysis in this report produces the most optimistic picture because the overriding assumption is that all vacant land is available for sale and/or development. This is clearly not the case. In many cases, land is either not available for sale or being held for further development expansion.

Even though our analysis of the remaining supply of vacant land in Hornby/Islington of 7.1 years appears reasonably tight, in actual fact, real supply is likely to be significantly less. This explains why there has been rampant land value escalation during the last two years of up to 50%.

The situation in Rolleston has potentially been relieved by the recent resolution by SDC on 8 March 2023 to accept the Commissioner's recommendation to approve Pan Change 80 to rezone approximately 98 ha of Rural Inner Plains land to Business 2A adjacent to Two Chain Road on the south Weston edge of Izone. The SDC resolution is open to appeal until 8 May 2023.

Rezoning approximately 23 ha in Marshs Road from Rural Urban Fringe to Industrial Heavy will relieve the pressure on land supply and land value escalation in the most preferred large warehouse district of Christchurch of Hornby South and Islington.

These reports are in turn supported by reports (Annexure I – Agricultural Report) and (Annexure J – Productive Land Report). Jointly these reports conclude:

Annexure J – Potential Loss of Productive Land

This report concludes:

“7. Assessment of the Site and Proposal Against clause 3.6 of the HPL

7.1 Introduction

While we have concluded that the site is not HPL under Clause 3.6, for completeness we also assess the proposal against Clause 3.6 which relates to proposals for rezoning HPL.

7.2 Clause 3.6 Rezoning Criteria

If the Site meets the definition under Clause 3.6, then rezoning of it for urban purposes (as the applicant seeks) is only authorised under the NPS-HPL where:

- a. the rezoning is required to meet the development capacity obligations of the NPS-UD; and*
- b. there are no other reasonable practicable and feasible options for meeting those obligations within the same locality and market while achieving a well-functioning urban environment; and*
- c. the benefits of the urban rezoning outweigh the longer-term environmental, social, cultural and economic costs associated with the loss of highly productive and for land-based primary production, taking into account both tangible and intangible values.⁹*

In assessing (b), consideration must be given to a range of options including rezoning of land that is not highly productive as urban, and rezoning different highly productive land that has a relatively lower productive capacity.

The focus of Reeftide's input and this memo is therefore on supporting the alternative options assessment required under (b) and provide commentary on the cost-benefit analysis associated with the loss of the Site for land-based primary production under (c).

Critical to both parts of that assessment is, however, the productive capacity of the site itself. Identification of preferable alternative locations for primary production will depend (in part) on the capacity of those locations to accommodate primary production compared to the site. Similarly, any costs associated with the loss of highly productive land also directly correlate to its relative capacity to support primary production over the longer term. Where the land in question has negligible productive value, then costs associated with the loss of that land will be negligible.

In summary, Reeftide supports the proposal to rezone the Site for industrial development in terms of the directions of the NPS-HPL on the basis that:

- a. The site is not considered HPL under Clause 3.4 of the NPS-HPL due to its location.*
- b. There are multiple long-term constraints on the capacity of that site to support primary production activities.*
- c. In light of these constraints, the overall benefits of retaining this land for primary production are negligible. That is especially given:*
 - i. There are no other rural sites within the same locality that have lower productive capability or less constraints than the site.*
 - ii. The proportional reductions in HPL in the district and the region as a result of the rezoning of the site are insignificant.*

- iii. *The servicing of the site has been factored into the services already provided for within The Hornby Quadrant development adjacent to the site.*
- iv. *The site is fragmented being comprised of 40 lots and is isolated as defined in Clause 3.4 of the NPS-HPL.*

Annexure I – Agricultural Report

This report concludes:

The proposed rezoning of 23 hectare of land between Marshs Road and State Highway 1, Templeton from Rural Urban Fringe to Heavy Industrial will not result in a loss of productive capacity of highly productive land in the community as the land is sufficiently, and permanently constrained that it is unsuitable for economically viable, land-based, primary producing activities.

I conclude that the land holding is economically unviable as a land based primary producing unit and will continue to remain economically unviable when considering a 30 year time scale given the constraints of resource availability and likely increasing reverse sensitivity effects. I conclude this as none of the assessed farm or horticultural systems meet the Return on Capital threshold while meeting the pro-rata owner remuneration target, necessary to be defined as economically viable.

The applicants proposal to rezone 23 hectares of land currently zoned Rural Urban Fringe to Heavy Industrial between Marshs Road and Stage Highway 1, Templeton will not result in a reduction of land available for economically viable, highly productive, land-based primary production.

The second Clause 3.6(1)(b) requires the following:

b. there are no other reasonably practicable and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment; and

Clause (b) is further expanded on by clauses 3.6(2), (3) and (4). In terms of these clauses, development capacity is within the same market and locality and this is confirmed by Annexures B and C.

In addition to clause 3.6(4)(b), the reports (Annexure (B) and (C) have outlined the importance of and potential industrial land shortfall in this preferred industrial area of Christchurch. There are no other reasonable practicable options for developing the capacity given the location, accessibility, service connections and agricultural limitations of the subject land.

Clause 3.6(4)(c) sets out as follows:

(c) the environmental, social, cultural and economic benefits of rezoning outweigh the environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.

In summary in respect of section 3.6(a), (b) and (c):

- that the social effects will involve the eventual loss of residential activity but this is balanced against the importance of the location to the IHZ business zoning and employment opportunity,
- the land is not and has not been used for any significant productive purpose;
- that it is not HPL;
- that there is no productive agricultural activity that could readily be undertaken based on the NPS-HPL. The land is economically unviable as a land based primary producing unit (Annexure I).;
- there are multiple constraints on the capacity of the site to support primary production;
- it will not impact the proportion of HPL in the district;
- that the land is located in the most preferred industrial area in Christchurch;
- that the analysis undertaken of Industrial Heavy land supply is that there is a growing shortage in this area and the rezoning will relieve the pressure (Annexure C);
- It safeguards the land from unsuitable or the best use development opportunity;
- consolidates the HIZ in the right location and market;
- provides for the efficient use and integration of infrastructure;
- is highly accessible to all forms of transport and will enhance that outcome; and
- has the potential to put downward pressure on industrial land prices.

Having regard to the above it is noted that Clause 3.10(1) (NPS-HP) sets out – *Exemptions for highly productive land subject to permanent and long-term constraints*. These are in detail:

- (1) *Territorial authorities may only allow highly productive land to be subdivided, used, or developed for activities not otherwise enabled under clauses 3.7, 3.8, or 3.9 if satisfied that:*
- (a) *there are permanent or long-term constraints on the land that mean the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years; and*
 - (b) *the subdivision, use, or development:*

- (i) *avoids any significant loss (either individually or cumulatively) of productive capacity of highly productive land in the district; and*
 - (ii) *avoids the fragmentation of large and geographically cohesive areas of highly productive land; and*
 - (iii) *avoids if possible, or otherwise mitigates, any potential reverse sensitivity effects on surrounding land-based primary production from the subdivision, use, or development; and*
 - (c) *the environmental, social, cultural and economic benefits of the subdivision, use, or development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.*
- (2) *In order to satisfy a territorial authority as required by subclause (1)(a), an applicant must demonstrate that the permanent or long-term constraints on economic viability cannot be addressed through any reasonably practicable options that would retain the productive capacity of the highly productive land, by evaluating options such as (without limitation):*
- (a) *alternate forms of land-based primary production;*
 - (b) *improved land-management strategies;*
 - (c) *alternative production strategies;*
 - (d) *water efficiency or storage methods;*
 - (e) *reallocation or transfer of water and nutrient allocations;*
 - (f) *boundary adjustments (including amalgamations);*
 - (g) *lease arrangements*
- (3) *Any evaluation under subclause (2) of reasonably practicable options:*
- (a) *must not take into account the potential economic benefit of using the highly productive land for purposes other than land based primary production; and*
 - (b) *must consider the impact that the loss of the highly productive land would have of the landholding in which the highly productive land occurs*

Assessment:

The reports on the potential loss of productive land (Annexures I and J) concluded:

- a. *There are multiple long-term constraints on the capacity of the site to support primary production activities.*
- b. *In light of these constraints, the overall benefits of retaining this land for primary production are negligible. That is especially given:*
 - i. *There are no other rural sites within the same locality that have lower productive capability or less constraints than Calder Stewart's site.*
 - ii. *The proportional reductions in HPL in the district and the region as a result of the rezoning of the Site are insignificant.*

- iii. *The servicing of the Site has been factored into the services already provided for within The Hornby Quadrant development adjacent to the site.*
- iv. *The Site is fragmented being comprised of 40 lots and is isolated as defined in Clause 3.4 of the NPS-HPL.*

The assessment concludes that although the site contains Class 1-3 soils it is not NPS-HPL because there are long term constraints and no alternate forms of land based primary productive exist. In turn the Agricultural Viability report (Annexure I) in summary noted:

The proposed rezoning of 23 hectare of land between Marshs Road and State Highway 1, Templeton from Rural Urban Fringe to Heavy Industrial will not result in a loss of productive capacity of highly productive land in the community as the land is sufficiently, and permanently constrained that it is unsuitable for economically viable, land -based, primary producing activities by way of all the constraints (Refer Annexures I and J)

To Quote: "We conclude that the land holding is economically unviable as a land based primary producing unit and will continue to remain economically unviable when considering a 30 year time scale given the constraints of resource availability and likely increasing reverse sensitivity effects. I conclude this as none of the assessed farm or horticultural systems meet the Return on Capital threshold while meeting the pro-rata owner remuneration target, necessary to be defined as economically viable."

The applicant's proposal to rezone 23 hectares of land currently zoned Rural Urban Fringe to Heavy Industrial between Marshs Road and State Highway 1, Templeton will not result in a reduction of land available for economically viable, highly productive, land-based primary production.

The overall assessment is that the subject land by reference to Clause 3.10 would largely reflect these matters and outcomes. In summary:

Highly Productive Land (HPL) is defined as land in Land Use Capability (LUC) Classes 1-3 as defined in the National Policy Statement for Highly Productive Land (NPS-HPL). Based on the current soil classification, the site soils are all LUC 2. Therefore, the Site soils are 100% HPL.

Inspite of the LUC Class 2 soils, the site is not considered to be HPL under Clause 3.4 of the NPS-HPL because:

- *The Site is isolated and is essentially an island being bound by Main South Road, the residential dwellings along both Marshs Road and Main South Road and the industrial developments to the east and southeast.*

- *The site is relatively small in the context of both the district and the Canterbury region as discussed in Section 12 of this memo.*
- *When we apply the criteria suggested in Clause 3.4(5)(b) we conclude that the 23.24 ha LUC Class 2 land is “a small discrete block of land that must not be included in the mapping of HPL because it is separated from any large and geographically cohesive area of” LUC 2 land.*
- *Based on Clause 3.6, the site is unproductive and we find no reason for Calder Stewart’s proposal not to be permitted under the NPS-HPL.*

While we have concluded that the site is not HPL, for completeness we have assessed the proposal under Clause 3.6 of the NPS-HPL. A more detailed assessment is provided in Sections 7-12 of this memo (Annexure I). From this assessment we also concluded that the site is not HPL. This is because, there are some ‘constraints’ which will (in some cases significantly) affect the productive capacity of any site. These include moisture limits and irrigation availability, nutrient limits, fragmentation of the land and reserve sensitivity. These factors are summarised as follows:

- *Moisture deficits, irrigation availability, nutrient limits, fragmentation, and revers sensibility (Refer Annexures I and J).*

7.5 Subpart 2 - Responsive Planning

Recognising the above Subpart 2 – Responsive Planning provides for:

3.8 Unanticipated or out-of-sequence developments

- (1) *This clause applies to a plan change that provides significant development capacity that is not otherwise enabled in a plan or is not in sequence with planned land release.*
- (2) *Every local authority must have particular regard to the development capacity provided by the plan change if that development capacity:*
 - (a) *would contribute to a well-functioned urban environment; and*
 - (b) *Is well-connected along transport corridors; and*
 - (c) *meets the criterial set under subclause (3)*
- (3) *Every regional council must include criteria in its regional policy statement for determining what plan changes will be treated, for the purpose of implementing Policy 8, as adding significantly to development capacity.*

In addressing the Clause 3.8 matters the following is concluded:

- (a) *Would contribute to a well-functioning urban environment;*
 - *The site is essentially surrounded by urban development and predominantly IH zoning;*

- The site is already broken into some 30 plus titles and largely operated as a defacto urban area containing some 30 plus dwellings;
- It is well located in terms of access to other urban facilities; and
- It will reflect highly integrated development in every sense

(b) is well connected along transport corridors

- The connections to and the ability to contribute and expand the transport network (HGV, vehicles, public and cycle transport) is identified in detail in Annexure F and the RFI response to Annexure F. It is also set out in Annexure C particularly in terms of the wider logistics operations throughout the country.
- Servicing and road linkages are available to link with the existing IH zoning and the major transport corridors; and
- It will complete the minor arterial link from Shands Road SHNo1

(c) Finally having regard to Policy 8 (NPS-UD), the issue is whether the proposed zoning would add significantly to development capacity.

The total area of land involved (23ha) may not be viewed as significant in “area” terms although it is noted in Annexure C that;

“In summary, there is limited remaining land supply within preferred Christchurch areas, particularly Hornby/Islington, available for immediate development that is free of development ties. There are no factors that indicate this dynamic will change in the near term. This factor, combined with the strength in the industrial investment market sector, in our view is, and has caused sharp land value inflation in a relatively short space of time.”

In the absence of any definition of “significant” the definition provided in the Consise Oxford Dictionary is helpful including “of considerable amount or effect or importance”

In addition to the above there are a range of other significant considerations particularly the effect or importance of the addition which will add to development capacity. In particular:

- It is land unsuitable for any productive use and cannot be enhanced to be so;
- Has defined (fixed) boundaries;
- Is the last significant area of vacant land in this area of the city suitable for a industrial development;
- There is no other alternative land in the area which is as compatible with the IH zone;
- That it will significantly consolidate the urban industrial area in a compact urban form in a manner that is not possible for any other land in the locality;
- That the land can be linked into all services in an efficient manner;

- It will complete the minor arterial linkage between Shands Road and SHNo1 increasing both transport efficiency and safety through a much improved intersection with SHNo1;
- It will not result in fragmented development; and
- Mitigates any adverse effects and contributes to a well-functioning urban environment in terms of size, location, soil quality, services, transport and integrated industrial development.

Having regard to the definition and the above matters the site is significant especially in terms of effect and importance.

8. Canterbury Regional Policy Statement and Plans

8.1 The Regional Policy Provisions

- Canterbury Regional Policy Statement (CRPS)
- Canterbury Regional Land Transport Strategy
- Iwi management Plan

8.2 Canterbury Regional Policy Statement

The Christchurch City Council is required under Section 73(4) of the Act to give effect to the CRPS. Any proposed change to the City Plan must also give effect to the CRPS.

The CRPS provides direction on matters relevant to the growth of settlements within the region. The relevant chapters of the CRPS applicable to an assessment of the proposed plan change are:

- Chapter 5 – Land Use and Infrastructure
- Chapter 6 – Recovery and Rebuilding of Greater Christchurch
- Chapter 16 – Energy

(i) Chapter 5 – Land Use and Infrastructure

The provisions of Chapter 5 of the Canterbury Regional Policy Statement (RPS) are a relevant matter.

- **Objective 5.2.1 – Location, design and function of development (Entire Region)**

Development is located and designed so that it functions in a way that gives effect to the objectives and policies in Chapter 5 and in particular Objective 5.2.1. In particular the CRPS seeks to promote urban development that is efficient, integrated and consolidated.

- (1) achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth; and*

- (2) *enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which:*
 - (a) *maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coast line, significant landscapes and natural values;*
 - (c) *encourages sustainable economic development by enabling business activities in appropriate locations;*
 - (d) *minimises energy use;*
 - (f) *is compatible with regionally significant infrastructure; and*
 - (g) *avoids adverse effects on significant natural and physical resources.*

Assessment:

The proposal will enable the consolidation of the urban area and industrial activity in a manner which provides for enhanced economic and social wellbeing. It minimizes energy use and is compatible within the surrounding environment.

- ***Objective 5.2.2 – Integration of land-use and regionally significant infrastructure (Wider Region)***

- (1) *To recognise the benefits of enabling people and communities to provide for their social, economic and cultural well-being and health and safety and to provide for infrastructure that is regionally significant to the extent that it promotes sustainable management in accordance with the RMA.*
- (2) *To achieve patterns and sequencing of land-use with regionally significant infrastructure in the wider region are achieved so that:*
 - (a) *development does not result in adverse effects on the efficient operation, use and development of regionally significant infrastructure.*
 - (b) *the adverse effects resulting from the development and operation of regionally significant infrastructure are avoided, remedied or mitigated.*
 - (c) *there is increased sustainability, efficiency and liveability.*

Assessment:

There are no adverse effects on regional infrastructure. The regionally significant elements of infrastructure in the area are the road network, airport and underground services. The underground infrastructure has capacity and any contributions to upgrading, to the extent necessary will be made by the developer. There is no adverse effect on the operations of the airport or the road network. Rather there will be a significant improvement in the regional road network.

- ***Objective 5.2.3 – Transport network (Wider Region)***

A safe, efficient and effective transport system to meet regional, inter-regional and national needs for transport, which:

- (1) *supports a consolidated and sustainable urban form;*
- (2) *avoids or mitigates the adverse effects of transport use and its provision; and*

(3) *provides an acceptable level of accessibility.*

Assessment:

The development will make efficient use of the transport system. The activity is located where it is accessible to the principle transport networks and consolidates and improves a safe and efficient level of accessibility in the area (Refer Annexure F)

Policy 5.3.1 Regional growth implements Objective 5.2.1 and states:

To provide, as the primary focus for meeting the wider region's growth needs, sustainable development patterns that:

- 1. ensure that any urban growth occurs in a form that concentrates, or is attached to, existing urban areas and promotes a coordinated pattern of development;*
- 2. encourage within urban areas, housing choice, recreation and community facilities, and business opportunities of a character and form that supports urban consolidation;*
- 3. promote energy efficiency in urban forms, transport patterns, site location and subdivision layout;*
- 4. maintain and enhance the sense of identity and character of the region's urban areas; and*
- 5. encourage high quality urban design, including the maintenance and enhancement of amenity values.*

Assessment:

The proposed development represents a sustainable use of the natural and physical resources of the particular site and locality given its location in an area where it supports energy efficiency in term of accessibility and transport patterns. It concentrates urban activity, is attached to an existing urban/business area and promotes coordinated development and urban consolidation.

- ***Policy 5.3.7 – Strategic land transport network and arterial roads (Entire Region)***

In relation to strategic land transport network and arterial roads, the avoidance of development which:

- (1) significantly, adversely affects the functioning of this network and these roads, including the ability of this infrastructure to support passenger transport services; and*
- (2) forecloses the opportunity for the development of this network and these roads to meet future strategic transport requirements.*

Assessment:

There will be no adverse effects on the road network and no transport options are foreclosed. Rather there will be a reduction in the transport/capacity effects on the

city road network, removing traffic from traversing a number of neighbourhoods while consolidating the proposed activity with “like activities” centred on the main freight transport routes in the Hornby area .

- **Policy 5.3.8 –Land use and transport integration (Wider Region)**

Integrate land use and transport planning in a way:

- (1) *that promotes:*
 - (a) *the use of transport modes which have low adverse effects;*
 - (b) *the safe, efficient and effective use of transport infrastructure, and reduces where appropriate the demand for transport;*
- (2) *that avoids or mitigates conflicts with incompatible activities; and*
- (3) *where the adverse effects from the development, operation and expansion of the transport system:*
 - (a) *on significant natural and physical resources are avoided, or where this is not practicable, mitigated; and*
 - (b) *are otherwise appropriately controlled.*

Assessment:

The use of the site as proposed will support a range of transport modes, and will direct major traffic flows onto the upgrades and extended minor arterial network in Hornby/Islington (Refer Annexure G).

(ii) Chapter 6 – Recovery and Rebuilding of Greater Christchurch

The site is located within the area of Greater Christchurch (Map A) and the following set of objectives and policies are relevant.

Objective 6.2.1 – Recovery frameworks

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

- (1) *identifies priority areas for urban development within Greater Christchurch*
- (3) *avoids urban development outside of existing urban areas or Greenfield priority areas for development unless especially provided for in the RPS*
- (4) *protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;*
- (5) *protects and enhances indigenous biodiversity and public space;*
- (6) *maintains or improves the quantity and quality of water in groundwater aquifers and surface water bodies, and quality of ambient air;*
- (7) *maintains the character and amenity of rural areas and settlements;*
- (8) *protects people from unacceptable risk from natural hazards and the effects of sea-level rise; and*
- (9) *integrates strategic and other infrastructure and services with land use development. As set out in Policy 8 NPS-UD, local authority decisions affecting urban environments are responsive to plan changes that would add*

significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:

- (a) Unanticipated by RMA planning documents; or*
- (b) out-of-sequence with planned release*

Assessment:

The proposed plan change will support the recovery of Greater Christchurch. It is located in an area of the City which is dominated by urban/business activity. It is designed and located to make efficient use of the transport infrastructure and the land in this area, and reduce the impact of heavy goods vehicles on the transport network and amenity of the City. There is no risk to strategic infrastructure, services or anticipated land use developments. The site does not reflect a high level of rural character or amenity.

Chapter 6 was included in the RPS in 2013 having been incorporated from the Land Use Recovery Plan and was developed after the earthquakes to provide a resource management framework for the recovery of greater Christchurch through to 2028. The focus of Chapter 6 is to respond to the demand for business activities. Much of the land identified for business has been taken up and it is concluded that Chapter 6 needs to be assessed recognising that time has moved on and in some areas land has not been made available for business activity, and the situation has been overtaken by the NPS-UD and in particular Policy 8 of the NPS-Urban Development;

The position in respect of the subject land is also reflected in the land demand and economic assessments (Annexures B and C) which concluded that the land was suitable for IH zoning and use given the land has;

- Access to services/infrastructure
- Close to and will contribute significantly to the transport network
- Proximity to local supply and community facilities
- Close to the target market
- Proximity to suppliers and client base
- Adjacent to the existing HIZ in Hornby now regarded as one if not the most popular and significant industrial locations in Christchurch

As concluded in the Economic Assessment (Annexure B) the land is the last remaining pocket of land between the existing HIZ and SHNo1 and is a pragmatic and efficient outcome supporting a well-functioning and integrated urban environment.

Policy 6.3.1 largely reflects Objective 6.2.1 but adds specific reference to Greenfield priority areas on Map A. Those areas were largely created on the basis of the demand anticipated by the Canterbury Earthquakes but the process is now underway to reconsider future needs throughout Greater Christchurch and currently the proposed rezoning is not necessarily consistent with this policy in regard to Map A. In this context regard should also be had to a number of matters, namely Chapter 6 (RPS), the NPS-Urban Growth and the economic assessments (Annexures B and C).

- **Objective 6.2.2 – Urban form and settlement pattern**

The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by:

- (4) *providing for the development of greenfield priority areas on the periphery of Christchurch's urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure.*

Assessment:

The land sits within the urban area of Christchurch (Map A) and is now largely land locked by the Industrial Heavy Zone, the Industrial General zone and the major regional road transport network (Refer Policy 6.3.1 above).

- **Objective 6.2.3 – Sustainability**

Recovery and rebuilding is undertaken in Greater Christchurch that:

- (2) *retains identified areas of special amenity and historic heritage values;*
- (3) *retains values of importance to Tangata Whenua; and*
- (5) *is healthy, environmentally sustainable, functionally efficient, and prosperous.*

Assessment:

No areas of special amenity or values to the Tangata Whenua are compromised.

- **Objective 6.2.4 – Integration of transport infrastructure and land use**

Prioritise the planning of transport infrastructure so that it maximises integration with the priority areas and new settlement patterns and facilitates the movement of people and goods and provision of services in Greater Christchurch, while:

- (1) *managing network congestion;*
- (2) *reducing dependency on private motor vehicles;*
- (3) *reducing emission of contaminants to air and energy use;*
- (4) *promoting the use of active and public transport modes;*
- (5) *optimising use of existing capacity within the network; and*
- (6) *enhancing transport safety.*

Assessment:

The zoning will not adversely impact the transport network in the vicinity of the site. The location of the zoning will however reduce vehicle movement, enhance transport safety, manage network congestion within the city and optimise the road network capacity in the area.

Supporting the above objectives are;

Objective 6.2.6 – Business Development

Identify and provide for Greater Christchurch's land requirements for the recovery and growth of business activities in a manner that supports the settlement pattern brought about by Objective 6.2.2, recognising that:

- (1) The Greenfield priority areas for business in Christchurch City provide primarily for the accommodation of new industrial activities:*
- (2) Except where identified for brownfield redevelopment, areas used for existing industrial activities are to be used primarily for that purpose, rather than as a location for new commercial activities;*
- (3) New commercial activities are primarily directed to the Central City, Key Activity Centres, and neighbourhood centres; and*
- (4) A range of other business activities are provided for in appropriate locations.*

Assessment:

The objective addresses business land development and in particular reflects the need to provide for a range of business land opportunities which promote efficiency and accessibility and reduced energy use. The use of the subject site for the zoning sought will achieve all of these outcomes. The objective in particular refers to:

While there is some capacity for the demand for further industrial business land to be met through the redevelopment of existing zoned land, particularly within Christchurch City, the Greenfield priority areas for business provide for the accommodation of new, primarily industrial business activities. There may also be requirements for relocation of business activities to better land, or areas with potential for expansion where land is currently constrained.

Significantly the policy explanation also refers:

“MAP A shows existing urban areas and priority areas for development for Greater Christchurch. These areas are identified as being required to provide sufficient land zoned for urban purposes to enable recovery and rebuilding through to 2028. The Policy and Map A provide a clear, co-ordinated land use and infrastructure framework for the recovery of Greater Christchurch.”

As such the time period for providing for future industrial land provision has largely arrived and as indicated in the two economic assessments there is a growing need for additional industrial land and the particular locality is one of the preferred industrial hubs in greater Christchurch. This position is highlighted by the NPS-Urban Development Policy 2 which advocates for sufficient development capacity (at all times) for business over the short, medium and long term with long term being defined as 10-30 years.

The land has already been rezoned from Rural to Rural-Urban Fringe. Given the particular circumstances of the land (location and character/quality) and the business

activity proposed, then the land is well suited in that it will provide for the establishment of business in an area which is in large part dominated by business zoning and activity. The suitability of and the demand for business land in this area of the City (Hornby/Islington) is well established. Refer the Economics and Land Supply Reports (Annexures B and C). With regard to the various criteria listed in Policy 6.3.6 then:

In respect of the matters set out in Policy 6.3.6 and in particular the matters by which business activities are to be provided for the assessment is:

- The proposed plan change recognises the growing demand for business activity in this location of Christchurch,
 - Supports the integration with and utilisation of existing business land,
 - Recognises that the provisions of the RPS in respect of providing for business land and services until 2028 are rapidly approaching and that there is a demonstrable need and desire for additional land in this sector of Christchurch (Refer also Policy 8 of the NPS – Urban Development),
 - Will achieve the desired level of amenity for the surrounding business and rural zones,
 - Utilises existing infrastructure and contributes to infrastructure without cost to the community,
 - Close to a labour supply and is central to a major regional business transport hub, and
 - Can incorporate good urban design
- **Policy 6.3.1 – Development within the Greater Christchurch area**
In relation to recovery and rebuilding for Greater Christchurch states;
 1. *give effect to the urban form identified in Map A, which identifies the location and extent of urban development that will support recovery, rebuilding and planning for future growth and infrastructure delivery;*
 3. *enable development of existing urban areas and greenfield priority areas, including intensification in appropriate locations, where it supports the recovery of Greater Christchurch;*
 4. *ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, **unless they are otherwise expressly provided for in the CRPS;***

In summary the Marsh's Road development appears to be contrary to clauses 1 and 4 as the site adjoins but is just outside the Map A urban limit. The PPC sets out a number of reasons why these provisions should not prevent the City Council from deciding to rezone the Marsh's Road land for business development including:

- That the conflict is a minor technicality, well below regional significance.

- That the decision in Our Space indicated that the boundaries were indicative only and that the merits of any proposal could be considered without being precluded by Map A
- The fact that the land is zoned for RUF and adjoins major Christchurch industrial zoning is contrary to policies in the CRPS and District Plan but now appears to prevent its logical use for business development.
- The CRPS provisions are historical and out of date and arguably contrary to the NPS-UD as a planning tool
- There are no local or regional concerns that justify the continued existence and restrictive effects of the urban limit line in its present location, separating the site from the remainder of the business area of south-west Christchurch.

On the basis of these reasons the Map A boundary in south-west Christchurch should not impede the logical rezoning of the Marsh's Road from RUF to IH.

Policy 6.3.2 – Development Form and Urban Design has been addressed in terms of the ODP (or the extension thereto) and the plan change assessment. The assessment concludes that the area to be rezoned will achieve a high level of amenity, efficiency and business integration and give effect to policy 6.3.2.

Policy 6.3.3 – Development in Accordance with an ODP is also met.

The proposed development is in accordance with an ODP. The ODP South-West Hornby covers the adjoining land and this will be extended to incorporate the land subject of the Plan Change request (Refer Attachment 2 to the Plan Change Request) providing a consistent integrated plan and in particular:

- The extension of the minor arterial from Shands Road to SHNo1,
- Complete the full four way controlled light intersection at SHNo1/Pound Road,
- Will achieve a high level of amenity along the IH – rural zone boundary on Marshs Road,
- Provision of and proximity to all modes of transport,
- Will provide a choice and range of development sites,
- Will not adversely impact water or soil resources, and
- Land is set aside for landscape opportunity and mitigation

In terms of **Policy 6.3.4 – Transport effectiveness**, the plan change reflects an integrated transport outcome in terms of the road network and the type of land use activity involved. The proposed plan change will operate as part of the wider transport hub and the strategic routes centred on Hornby/SHNo1 thereby delivering economic wellbeing and energy efficiency.

Policy 6.3.5 – Integration of land use and infrastructure, clauses 1-5 emphasises integration of land use and infrastructure. The factors and outcomes sought in Policy 6.3.5 have formed the basis for identification of growth areas with Greater Christchurch. To date much of the industrial growth areas has focussed on Rolleston

however this (Marshs Road) area is also in an outstanding location to efficiently utilise existing and planned extensions and upgrades of services including roading upgrades. The servicing of the proposed new areas is addresses in the Plan Change request. It concludes that the proposed areas will make efficient use of existing infrastructure as well as requiring new services to be developed such as sewer pump stations. Water supply can be efficiently connected and stormwater treated and disposed of within the development sites. On this basis it is concluded that the proposal gives effect to this policy.

The plan change rezoning by way of location and style of activity is highly supportive of the above outcomes and will make good use of the strategic infrastructure, particularly the road network.

Policy 6.3.6 – Business Land, addresses the need to utilise existing business land and provide sufficient additional Greenfield priority land for business in accordance with Map A. A number of outcomes are sought through the policy including:

- Reinforcing the role of the central city,
- Recognising new priority areas for business,
- Utilising existing infrastructure efficiently,
- Ensuring reverse sensitivity effects are mitigated, and
- Ensuring close proximity to labour, transport hubs and passenger transport networks

Policy 6.3.7 – is similar to Objective 6.2.1 Recovery Framework, Objective 6.2.2 Urban Form and settlement pattern and Policy 6.3.1 Development within the Greater Christchurch Area, all of which seek that urban growth occur within identified greenfield priority areas which are specified on Map A in Chapter 6 of the CRPS. As referred to in the assessment of these polices the Greenfield areas identified on Map A were developed on the primary basis of anticipated demand created by the recovery and rebuilding process following the Canterbury earthquakes and these focussed on Rolleston within the Selwyn District Council area. The growth analysis was stated to apply through to 2028, however recent analysis of population growth and take-up of land for business (Refer Annexures B and C) has shown that the growth requirements were underestimated and land availability overestimated.

As mentioned it is considered that the objectives and policies in the current Chapter 6 need to be applied and evaluated recognising that the industrial needs of Greater Christchurch have moved on from responding to the impacts of the earthquakes and from only considering the larger townships of Rolleston and Rangiora. There is a demand for business land simply created by natural growth in the population. To meet this demand in an efficient manner and to avoid causing the price of new land to increase beyond normal levels there needs to be provision to meet this demand in other areas such as Hornby which has an unsatisfied demand for industrial sites with a range of sizes.

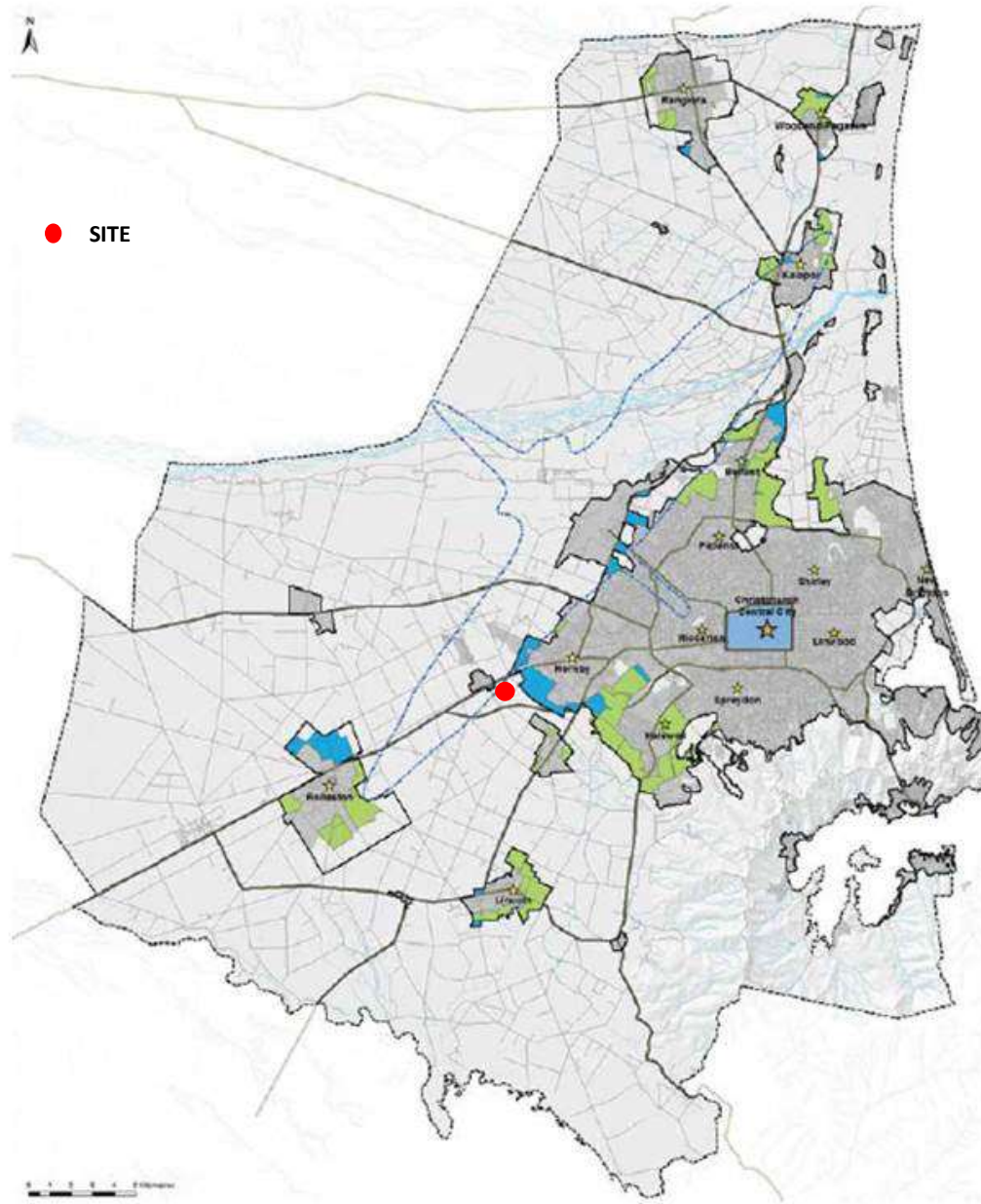
With regard to the relevant criteria listed in Policy 6.3.7 there is infrastructure capacity to provide for the development of the site and the outline development area plan has been prepared for that purpose (Refer Annexure D).

Assessment:

This set of policies provides a critical framework in terms of assessing the plan change against the provisions of the RPS. Policy 6.3.1 sets out that recovery and rebuilding should give effect to the urban form identified on Map A. Within Policy 6.3.1 a number of matters are relevant being;

- (1) give effect to the urban form identified in Map A which identifies the location and extent of urban development that will support recovery, rebuilding and planning for future growth and infrastructure delivery;*
- (3) enable development of existing urban areas and greenfield priority areas, including intensification in appropriate locations, where it supports the recovery of Greater Christchurch;*
- (4) ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the CRPS.*

The principle reasons for the areas identified on Map A is that they provide sufficient land for urban purposes including a coordinated land use and infrastructure framework for the recovery of Greater Christchurch. The definition of “Urban” within the RPS does not assist, referring to urban activities in a much broader context. Given the outcome of the City Plan and that the land is now located within the broader urban area of Christchurch including having a Rural-Urban zoning, then the proposed activity is coordinated and integrated with related urban activities, the road network and general access to infrastructure. As such the use of the site for the purpose proposed does not adversely affect the urban form identified on Map A. Rather the site sits in a location in terms of Map A where it is largely surrounded by Urban activity (Refer Map A over).



It is recognised that the site is located outside but alongside and bounded by a Greenfield business priority area. In every other sense the proposal (and site) reflects the outcomes sought by way of policy 6.3.6. In particular:

- It is located around (and within) the urban area and utilising existing urban infrastructure,
- It is alongside one of the principle industrial/freight transport hubs, of which it will be part,
- It is located alongside the major freight network and as such is highly energy efficient, and
- Is highly accessible in terms of all modes of transport including public transport, private car or bicycle.

(iii) Chapter 16 – Energy

- ***Objective 16.2.1 – Efficient use of energy***

Development is located and designed to enable the efficient use of energy, including:

- (1) maintaining an urban form that shortens trip distances;*
- (2) planning for efficient transport including freight;*
- (3) encouraging energy-efficient urban design principles;*
- (4) reduction of energy waste; and,*

so that demand for distribution and transport infrastructure is reduced.

Assessment:

The plan change outcome will reflect a highly efficient transport (business) outcome. It will make good use of the road network and is predicated on energy efficient development, given the proximity to the urban area, the type of activity involved, the improvements to the road network in the area and access to the principle road freight network.

Conclusion in terms of the objectives and policies:

In terms of the objectives and policies of the RPS then the assessment is that the proposed plan change is not contrary to these provisions. In summary;

- It achieves consolidated development,
- It integrates land use and regionally significant infrastructure particularly the road network,
- It represents a highly efficient use of the transport network,
- It is largely attached to or surrounded by urban and industrial development and zoning,
- There is no impact on significant natural resources or water quality,
- The land can be serviced,
- There are no geotechnical constraints to development,
- It does not adversely effect the land transport network or arterial roads, rather it expands the arterial road network,

- That although not in accord with Map A, it largely reflects the Map A outcomes,
- It reflects an urban form which is highly transport effective and integrated in terms of its associated activities,
- It is possible to mitigate any adverse effects on the local community, and
- There is a demonstrated need for additional business land in this locality (Hornby)

8.3 Canterbury Regional Land Transport Strategy (RLTS)

The RLTS sets out the guidelines that should be essential to, and be represented in, a good land transport system. These include:

- equitable access for all members of the community;
- support the economy;
- safety;
- contributes to a healthy and pollution-free environment;
- is part of an integrated land use and transport system; and
- can respond to change.

The site and the development outcome address and accommodate these matters. In particular:

- the site is located alongside and is part of a substantial urban community and industrial transport hub;
- the site is convenient and accessible to the community, particularly in terms of its function and purpose;
- the development of the site as sought will promote a safe and healthy environment for the community;
- development of the site will support the economy and improve the transport and environment within and around the City; and
- the conclusion of the transport assessment (Annexure F) is;

It is considered a logical completion of the industrial area and rezoning will have a number of transport-related benefits as outlined in this report.

Development of the site will allow for the new Minor Arterial road between Shands Road and SH1 to be completed. The connection to SH1 opposite Pound Road will provide a more connected road network for the wider area. It will result in reduced travel distances and times in the wider area and improved accessibility to the neighbouring industrial areas by non-car travel modes; notably cycling from the major cycleway and walking from the bus stops both on Waterloo Road.

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 traffic modelling indicates that the SH1 / Pound Road intersection will be able to operate acceptably during peak times with the fourth leg added. The existing lane arrangements on SH1 and Pound Road will be able to be retained, with a right turn lane added on the western SH1 approach within the existing median. A preliminary concept design suggests that property will be required from the lot to the east of the intersection but may not be required from the lot to the west.

8.4 Land and Water Regional Plan, Canterbury Air Regional Plan

The operative Land and Water Regional Plan broadly manages land and water within the Canterbury Region, by way of water allocation limits and restricting the type and volume of discharge permitted. The objectives and policies of the Canterbury Air Regional Plan seek, in relation to industrial and trade activities and large scale fuel burning devices, identifying the best practicable options to minimise the effects of discharges, manage, and in some situation avoid discharges of PM10, manage discharge of odour and dust from solid or liquid waste, and addressing localised effects of discharges including relative to sensitive receptors.

It is expected that future discharges from the development fall to be permitted under the Rules of the Land and Water Regional Plan or Air Regional Plan, assessed through the resource consent process, with Environment Canterbury as the administering body. At such time as detailed development plans for development are advanced, various options will be available for discharges.

8.5 Iwi Management Plan

Iwi Management Plan

The Mahaanui Iwi Management Plan (IMP) sets out Ngāi Tahu's objectives, issues and policies for natural resource and environmental management within the area bounded by the Hurunui River in the north and the Ashburton River in the south. Under Section 74(2A) of the Resource Management Act, a territorial authority must take into account any such plan to the extent that it has a bearing on the resource management issues of the district. The IMP is primarily a tool for the Rūnanga in the area it covers; the plan also provides guidance to territorial authorities and others. The IMP sets out the broad issues as well as the specifics for particular areas. These matters are considered below, as they are relevant to this proposed Plan Change. It is noted that the IMP does not identify any specific cultural values associated with this land that might be adversely impacted by its development.

Ranginui

The relevant matters identified in IMP are discharges to air and the protection of night time darkness. The proposed Plan Change does not contain controls on these matters.

Wai Māori

Freshwater is of considerable cultural significance to Rūnanga. The main matters of concern relate to water quality and quantity and mixing waters from different waterbodies.

Papatūānuku

The use of land and how it is developed is of importance to Rūnanga. This section identifies matters such as the urban planning, the subdivision and development of land, stormwater, waste management, and discharges to land. The potential effects of the proposal on the environment have been discussed in Section 8.4 and Annexures D and E of this Plan Change request. Those assessments conclude that there will be minimal adverse impacts on the quality of the natural environment as no waste or contamination will be discharged in a manner that will compromise the mauri of surface or groundwater.

Tāne Mahuta

This section addresses the significance of indigenous biodiversity and mahinga kai to Rūnanga. The application site is not located in a known mahinga kai area.

Ngā tūtohu whenua

There are no known wāhi tapu, wāhi taonga or mahinga kai sites within the application site or close by.

Summary

It is considered that overall the proposal will not have an adverse impact on the cultural values of iwi as set out within IMP.

9. Christchurch City Plan

Under Section 104(1)(b)(vi) of the RMA consideration must be given to the relevant provisions of a plan or proposed plan. In this respect the objectives and policies of the District Plan are relevant to an assessment of the application. There are a number of relevant objective and policies being:

- Chapter 3 – Strategic Directions
- Chapter 7 – Transport,
- Chapter 8 – Subdivision, Development and Earthworks,
- Chapter 9.5 – Ngai Tahu Values,
- Chapter 16 – Industrial, and
- Chapter 17 – Rural

9.1 Chapter 3 – Strategic Directions

The principle Objectives (Strategic Directions) relevant to the plan change are as follows:

- *3.3.1 Objective – Enabling recovery and facilitating the future enhancement of the district*
- *3.3.5 Objective – Business and economic prosperity*
- *3.3.7 Objective – Urban growth, form and design*
- *3.3.10 Objective – Commercial and industrial activities*
- *3.3.12 Objective – Infrastructure*
- *3.3.14 Objective – Incompatible activities*

Assessment

In summary the proposed Plan Change:

- Will enhance economic prosperity,
- Reflects a well-integrated pattern of development and the efficient utilisation of infrastructure particularly given the site is located alongside a Greenfield Priority Area Business (RPS) and there is no adverse effects on infrastructure or other activities, and
- There is an established level of mitigation for the IH zone

9.2 Chapter 7 – Transport

The relevant objectives and policies in terms of transport are set out below.

7.2.1 Objective - Integrated transport system for Christchurch District

7.2.1.1 Policy - Establishment of a road classification system

7.2.1.2 Policy - High trip generating activities

7.2.1.3 Policy - Vehicle access and manoeuvring

7.2.1.4 Policy - Requirements for car parking and loading

7.2.1.6 Policy - Promote public transport and active transport

7.2.1.8 Policy - Effects from transport infrastructure

7.2.2 Objective - Adverse effects from the transport system

Assessment

There are no adverse effects in terms of the above objectives and policies. Rather the Plan Change will positively promote and implement an integrated transport system by:

- Providing for the completion of the minor arterial Shands Road to SHNo1,
- Provide sites that can meet all on-site vehicle requirements,
- Is close to and enhance the opportunity for public transport, and
- Reduces the adverse effects of heavy transport on the surrounding local roads

9.3 Chapter 8 – Subdivision, Development and Earthworks

The relevant objectives in terms of Earthworks are set out as follows.

- 8.1.4 Objective – Earthworks
- 8.1.4.1 Policy – Water quality
- 8.1.4.3 Policy – Benefits of earthworks
- 8.1.4.4 Policy – Amenity
- 8.1.4.5 Policy – Protection of wahi tapu and wahi taonga
- 8.1.5 Policy – Water quality
- 8.1.5.1 Policy – Land stability
- 8.1.5.2 Policy – Nuisance
- 8.1.5.3 Policy – Vehicle movement
- 8.1.5.4 Policy – Earthworks design

Assessment

All of these matters are addressed in the AEE and in particular Annexures B, D, and E. In summary:

- The principal earthworks required are for the creation of the roads and stormwater basins and will largely be done from materials on site,
- There will be no resulting erosion or adverse effects on ground water, and
- It is understood here are no sites of value or importance to the runanga

9.4 Chapter 16 – Industrial

The relevant objectives and policies related to industrial development in the City are set out below.

16.2 Objectives and Policies

16.2.1 Objective - Recovery and growth

- a. The recovery and economic growth of the district's industry is supported and strengthened in existing and new greenfield industrial zones.*

Assessment:

The PC will consolidate the Industrial Heavy/Logistics industry in one of, if not, the main industrial area in Christchurch (Refer Annexure C)

16.2.1.1 Policy - Sufficient land supply

- a. Maintain a sufficient supply of industrial zoned land to meet short, medium and long term supply needs of industrial activities, having regard to the requirements of different industries, and to avoid the need for industrial activities to locate in non-industrial zones.*

Assessment:

The outcome will help maintain a sufficient supply of industrial zoned land in terms of the attraction of the Hornby area for particular industry types and the potential developing shortage of Industrial IHZ land in the locality with few other options (Refer Annexures B and C).

16.2.1.2 Policy - Enable the development of industrial areas to support recovery

1. *Encourage the redevelopment of existing industrial zones for industrial activities, particularly in areas that have lost industry and associated employment opportunities due to the earthquakes.*

16.2.1.3 Policy - Range of industrial zones

1. *Industrial Heavy Zone*
 - A. *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.*

Assessment:

The proposed rezoning will consolidate the opportunity for HIZ activities providing for expansion in an area with some of the most convenient road access and logistics integration in the region.

16.2.1.4 Policy - Activities in industrial zones

- a. *Maintain and support the function of industrial zones while, subject to Clauses (b) and (c), providing for limited non-industrial activities that:*
 - i. *are ancillary in scale (subject to Clause (d)) and on the same site as a permitted or consented activity;*
 - ii. *are not appropriate in more sensitive environments due to their potential noise, odour or other environmental effects;*
 - iii. *incorporate characteristics that are compatible with the industrial zone and do not cause an undue constraint on other permitted activities within the zone;*
 - iv. *comprise yard based supplier or trade suppliers in the Industrial General Zone;*
 - v. *provide emergency service facilities and/or community corrections facilities;*
 - vi. *support the needs of workers and businesses in the zone including food and beverage outlets, commercial services, gymnasiums, and the care of children;*
- b. *Avoid any activity in industrial zones with the potential to hinder or constrain the establishment or ongoing operation or development of industrial activities and strategic infrastructure, or with the potential to be exposed to unacceptable risk. This includes but is not limited to avoiding:*
 - i. *sensitive activities located within the 50 dB L_{dn} Air Noise Contour, the Lyttelton Port Influences Overlay Area, the Woolston Risk Management Area and in proximity to the National Grid;*

- c. Avoid the use of industrial zones for non-industrial activities that could adversely affect the strategic role of the Central City, Town Centres and Local Centres as focal points for commercial activities, community activities, residential activities, and other activities.*
- d. Provide for ancillary activities, recognising their role in supporting industry, while being incidental in scale and function to a principal activity on the same site, and not inconsistent with Clauses b. and c..*

Assessment:

As noted the rezoning to HIZ supports the principal industrial zoning and activity in this part of the Christchurch industrial sector. It is bounded by HIZ on three sides with the SHNO1 and Commercial zoning consolidating the business and transport activity in the area.

16.2.1.5 Policy - Office development

- a. Avoid office development in industrial areas other than where it is:

 - i. ancillary to a permitted or consented activity on the same site (subject to [Policy 16.2.1.4](#) (d));*
 - ii. a secondary component to a high technology industrial activity located in the Industrial Park Zone that supports the function of the zone for primarily industrial activities.**

Assessment:

No changes are being made to the provision for office use within the PC area.

16.2.1.6 Policy - Regionally significant infrastructure - Inland Port

- a. Enable regionally significant inland port infrastructure to operate and develop efficiently and safely through provisions that enable port activities while avoiding the potential for reverse sensitivity effects associated with sensitive land uses.*

Assessment:

The land and activities more than most are well located to support the inland port infrastructure, both in terms of proximity and HGV access.

16.2.2 Objective - Brownfield redevelopment

- a. The recovery and economic growth of the Christchurch District is provided for by enabling residential and mixed-use redevelopment, of appropriate brownfield sites while supporting the function and role of the Central City and commercial centres, and not compromising the function of the wider industrial area for primarily industrial activities:

 - i. Commercial activities are primarily directed to the Central City and commercial centres; and**

- ii. *Where commercial activities are located out of centres as a result of brownfield redevelopment, there are no significant adverse distributional or urban form effects on the Central City and commercial centres; and*
- iii. *the function of the wider industrial area for primarily industrial activities is not compromised.*

Assessment:

There is no conflict with this policy.

16.2.3 Objective - Effects of industrial activities

- a. *Adverse effects of industrial activities and development on the environment are managed to support the anticipated outcome for the zone while recognising that sites adjoining an industrial zone will not have the same level of amenity anticipated by the Plan as other areas with the same zoning.*
- b. *The cultural values of Ngāi Tahu/ mana whenua are recognised, protected and enhanced through the use of indigenous species in landscaping and tree planting, a multi-value approach to stormwater management in greenfield areas, low impact urban design, and the protection and enhancement of wāhi tapu and wāhi taonga including waipuna.*

16.2.3.1 Policy - Development in greenfield areas

- a. *Manage effects at the interface between greenfield areas and arterial roads, rural and residential areas with setbacks and landscaping.*
- b. *Manage the development of greenfield areas in a manner aligned with the delivery of infrastructure, including upgrades to networks, to avoid adverse effects on networks serving these areas.*
- c. *Development shall recognise and support Ngāi Tahu cultural values through low impact urban design, the protection of sites of Ngāi Tahu cultural significance identified in Schedule 9.5.6.1, and recognition of other sites of Ngāi Tahu cultural significance identified in Appendix 9.5.6 including waterways, springs, wetlands and sites of indigenous vegetation where practicable.*
- d. *Enable the ongoing use of land in the Industrial Heavy Zone (South West Hornby), (identified on Appendix 16.8.8) for rural activities and the associated irrigation of food processing wastewater at South West Hornby as an integral component of the adjoining industrial activity.*

16.2.3.2 Policy - Managing effects on the environment

- a. *The effects of development and activities in industrial zones, including reverse sensitivity effects on existing industrial activities as well as,*

visual, traffic, noise, glare and other effects, are managed through the location of uses, controls on bulk and form, landscaping and screening, particularly at the interface with arterial roads fulfilling a gateway function, and rural and residential areas, while recognising the functional needs of the activity.

- b. Effects of industrial activities are managed in a way that the level of residential amenity (including health, safety, and privacy of residents) adjoining an industrial zone is not adversely affected while recognising that it may be of a lower level than other residential areas.*
- c. Development and activities are managed to avoid adverse effects on strategic infrastructure within or in proximity to industrial zones.*
- d. The quantity of wastewater discharged in areas over unconfined or semi-confined aquifers is restricted to minimise any risk of contamination.*
- e. The cultural values of Ngāi Tahu/mana whenua are recognised and supported through the protection of wāhi tapu and wāhi taonga, including waipuna, from the adverse effects of development, through the use of low impact urban design, use of indigenous species appropriate to the local environment, and stormwater management.*
- f. Development in the Industrial Heavy Zone is designed and laid out to promote a safe environment and reflects principles of Crime Prevention through Environmental Design (CPTED).*

Assessment:

The PC reflects the appropriate IHZ rules and mitigation measures and the proximity of an area of rural zoning. Different standards have been set for the Marshs Road boundary and for the proximity and timing of the development in relation to the residential properties. It is also an area where the road network is established to accommodate heavy traffic and this will be enhanced by the outcomes of the PC.

16.2.3.3 Policy - Managing stormwater

- a. Ensure that stormwater is managed in a way that:
 - i. mitigates the adverse effects of flooding; and*
 - ii. improves water quality in a manner which is consistent with maintaining environmental and public health.**
- b. Encourage methods that achieve:
 - i. a multi-value approach, using swales, wetlands, infiltration and retention basins, having regard to the location and environmental constraints; and*
 - ii. integration with the wider network, reflecting a catchment based approach.**

Assessment:

These matters are addressed in Attachment D with particular reference to Stormwater. The conclusion is that stormwater can be accommodated within the Council Global consent. In addition the PC will provide the opportunity to integrate stormwater management in the wider industrial area.

9.5 Chapter 17 - Rural

Chapter 17 – Rural contains a number of objectives and policies critical to an assessment of the Plan Change. These are:

17.2 Objectives and Policies

17.2.1 Objective - The rural environment

a. Subdivision, use and development of rural land that:

- i. *supports, maintains and, where appropriate, enhances the function, character and amenity of the rural environment and, in particular, the potential contribution of rural productive activities to the economy and wellbeing of the district;*
- ii. *avoids significant, and remedies or mitigates other reverse sensitivity effects on rural productive activities and natural hazard mitigation works;*
- iii. *maintains a contrast to the urban environment; and*
- iv. *maintains and enhances the distinctive character and amenity of Banks Peninsula and the Port Hills, including indigenous biodiversity, Ngai Tahu cultural values, open space, natural features and landscapes, and coastal environment values.*

17.2.2.1 Policy - Range of activities on rural land

a. Provide for the economic development potential of rural land by enabling a range of activities that:

- i. *have a direct relationship with, or are dependent on, the rural resource, rural productive activity or sea-based aquaculture;*
- ii. *have a functional, technical or operational necessity for a rural location; or*
- iii. *recognise the historic and contemporary relationship of Ngai Tahu with land and water resources; and*
- iv. *represent an efficient use of natural resources.*

Assessment

The site and the character does not reflect a number of the broader objectives and policies for the rural area. However the objectives and policies do recognise a diverse range of rural zones and rural activities. Taken at a detailed site level, Objective 17.2.1 (The rural environment) is determined by the land and this has limited productive capacity and in that sense (quality of the land resource) is not adversely impacted by the proposed activity. This is a neighbourhood which contains a high level of urban amenity by way of the nearby industrial activity, extensive residential use on the site, surrounding industrial zoning and the road network.

The same position arises in respect of Policy 17.2.2.1 (Range of activities) which provides for a range of activities which are dependent on the rural resource (productive potential) or have a functional, technical or operational necessity for a rural location. The site has limited rural “productive” potential while it is well located to serve the city’s industrial requirements. It is alongside the major transport network and has good access to the main national transport routes. This is land that has in part been identified as peri-urban which reflects its location and character and the change from rural to rural urban fringe zoning.

17.2.2.2 Policy - Effects of activities utilising the rural resource

- a. Ensure that activities utilising the rural resource avoid significant adverse effects on areas of important natural resources and avoid, remedy or mitigate other adverse effects on rural character and amenity values.*

Assessment

The proposed zoning will have no adverse effect on any natural resource. The main rural resource is the potential of the soil to provide for agricultural production. As set out in Annexures I and J, this will not result in the loss of or undermine a significant area of Highly Productive Land.

17.2.2.3 Policy - Contributing elements to rural character and amenity values

- a. Recognise that rural character and amenity values vary across the district resulting from the combination of natural and physical resources present, including the location and extent of established and permitted activities.*
- b. Recognise that the elements that characterise an area as rural, from which desired amenity is derived, include the predominance of:

 - i. a landscape dominated by openness and vegetation;*
 - ii. significant visual separation between residential buildings on neighbouring properties;*
 - iii. where appropriate, buildings integrated into a predominantly natural setting; and*
 - iv. natural character elements of waterways, water bodies, indigenous vegetation and natural landforms, including the coastal environment where relevant.**
- c. Recognise that rural productive activities in rural areas can produce noise, odour, dust and traffic consistent with a rural working environment, including farming, plantation forestry and quarrying, that may be noticeable to residents and visitors in rural areas.*

Assessment

This policy is important in that it recognises the varying character and amenity values of the rural area across the city. In particular it refers to the natural and physical resources present, including the location and extent of established and permitted activities. This locality is not dominated by rural activities (ie production) in a conventional rural sense. It is dominated by larger business activities. It is relevant to note that the policy recognises the varying character of the rural area that even “rural” activities can cause noticeable effects in terms of traffic, noise, dust and odour.

17.2.2.4 Policy - Function of rural areas

- a. Ensure the nature, scale and intensity of subdivision, use and development recognise the different natural and physical resources, character and amenity values, conservation values and Ngai Tahu values of rural land in the district, including:*
- i. the rural productive and recreation activities in the rural flat land area surrounding the main Christchurch urban area;*
 - ii. the flood management and groundwater recharge functions adjoining the Waimakariri River;*
 - iii. the historic and contemporary cultural landscapes, sites of Ngai Tahu cultural significance and the use of land and water resources for mahinga kai; and*
 - iv. the conservation activities undertaken within the Peacock Springs Conservation Area.*

Assessment

The land has limited rural productive value and this is in part reflected in the zoning change from a specific Rural Zone to the Rural Urban Fringe Zone. The ability to integrate the site and reduce the impact on any residential amenity is set out in Annexure E and the RFI addendum to that Annexure.

17.2.2.5 Policy - Establishment of industrial and commercial activities

- a. Avoid the establishment of industrial and commercial activities that are not dependent on or directly related to the rural resource unless they:*
- i. have a strategic or operational need to locate on rural land; or*
 - ii. provide significant benefits through utilisation of existing physical infrastructure; and*
 - iii. avoid significant, and remedy or mitigate other, reverse sensitivity effects on rural productive activities;*
 - iv. will not result in a proliferation of associated activities that are not reliant on the rural resource; and*
 - v. will not have significant adverse effects on rural character and amenity values of the local environment or will not cause adverse effects that cannot be avoided, remedied or mitigated.*

Assessment

It is necessary to look at the appropriateness of the use of the subject land for industrial activity has a number of advantages and reflects a number of wider policy benefits. The subject land does not contribute significantly to any rural productive outcome but its use for business does represent a number of significant benefits in that:

- it is located in an area of high demand and need for industrial growth,
- will utilise existing purpose designed industrial infrastructure,

- is located central to a major business hub and the national road network,
- will contribute to the industrial and general road network in this section of the city increasing transport efficiency and road safety,
- in large part reflects the local business environment and sits alongside a priority business area in terms of the Regional Policy Statement,
- is largely a self-contained block which will not result in the unconsolidated business activities and reflects an outcome that recognises that the RPS Greenfield Priority Areas were set through to 2028 and that date is rapidly approaching,
- Policy 8 of the NPS-Urban Development provides for addressing situations where local authority decisions are responsive to plan changes that add significantly to development capacity and contribute to a well-functioning urban environment even if the development capacity is unanticipated or out of sequence, and
- The site is not a significant or viable area of HPL.

10. Section 32 Assessment

10.1 Criteria of Section 32 Assessment

Before a proposed Plan Change is publicly notified an evaluation must be carried out by the person making the request. The evaluation, carried out under Section 32 of the Resource Management Act, must examine:

- (a) *the extent to which each objective is the most appropriate way to achieve the purpose of the Act; and*
- (b) *whether, having regard to their efficiency and effectiveness, the policies, rules, or other methods are the most appropriate for achieving the objectives.*
 - (i) *identifying other reasonably practicable options of achieving the objectives,*
 - (ii) *assessing the efficiency and effectiveness of the provisions in achieving the objectives, and*
 - (iii) *summarising the reasons for deciding on the provisions*
- (c) *Contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*

In addition an evaluation is required to take into account:

- The benefits and costs of policies, rules, or other methods, including opportunities for economic growth and employment
- The risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods.

The Guidance Note on Section 32 analysis on the Quality Planning website makes the following statement:

Appropriateness - means the suitability of any particular option in achieving the purpose of the RMA. To assist in determining whether the option (whether a policy, rule or other method) is appropriate the **effectiveness** and **efficiency** of the option should be considered:

- **Effectiveness** - means how successful a particular option is in addressing the issues in terms of achieving the desired environmental outcome.
- **Efficiency** - means the measuring by comparison of the benefits to costs (environmental benefits minus environmental costs compared to social and economic costs minus their benefits).

In this case it is the appropriateness of rezoning rural urban fringe land for industrial use that needs to be examined.

10.2 Objectives and Policies of the Christchurch City Plan

As the proposed Plan Change does not seek to alter any objectives or policies of the Christchurch City Plan, the examination under Section 32(3)(a) of whether the objectives of the City Plan are the most appropriate way of achieving the purpose of the Resource Management Act is not required. This is because as the City Plan is operative it is assumed that the objectives are the most appropriate way to achieve the purpose of the Act. Similarly, no policies are proposed to be altered and they remain the most appropriate means of achieving the objectives of the City Plan. Although an assessment of the appropriateness of the objectives and policies of the City Plan is not required, it is worthwhile to consider the proposed Plan Change against the objectives and policies contained within the City Plan. This assessment is contained in Section 9 above and concludes that the proposed rezoning of this site satisfies the listed matters and outcomes sought.

10.3 Assessment of the Benefits and Costs of the Proposed Change

In order to determine the effectiveness and efficiency of the proposed rezoning, an assessment of the benefits and costs of the proposed Plan Change, together with an examination of the risks of acting or not acting based on the information provided is required. In order to determine the relative benefits and costs of the proposed change, options other than the proposal should also be examined. In terms of this proposal the options considered are:

- Option 1 – Leave the area zoned Rural Urban Fringe
- Option 2 – Rezone the land as Industrial Heavy
- Option 3 – Rezone the land as Industrial General
- Option 4 – Apply for resource consents for proposed subdivision and development
- Option 5 – Increase separation distance between industrial zoning and the dwellings (west side of the site)

The following is an assessment of these options.

Benefits and Costs of Option 1 – Leave the area zoned Rural Urban Fringe

Benefits /Advantages	Costs/Disadvantages
• Maintains the existing character of the area • Allows the Council to implement CRPS within own timeframe	• Does not fulfil the City Plans objective of equitable process of rezoning • Reduces the potential level of choice for business activity given the RPS largely identified industrial land supply only till 2028 • Will not contribute to the cost of infrastructure • Will not complete the minor arterial link between Shands Road and SHNo1 • Does not reflect a process of an equitable approach to rezoning • Retains and area of unproductive land in limbo when a viable alternative is available • Risk of creating an area of land which is redundant • Does not contribute to the cost of services and road upgrades

Benefits and Costs of Option 2 – Rezoning the Subject Land as Industrial Heavy

Benefits /Advantages	Costs/Disadvantages
• Creates an additional range of allotments in an efficient and appropriate location for industrial use • Plenty of time and room for planting and screening • Reflects current City standards • No shading of neighbours • Provides long term certainty in terms of IH zoning and traffic/road management • Provides certainty of outcomes by way of an ODP • Access to new employment opportunities (Refer Annexures B and C) • Comprehensive landscape mitigation • Significant local investment • No impact on areas of significance to Iwi or natural resource (water) • Reflects Policy 8 of the NPS – Urban Growth • Provides for a balance of buildings	• Potential loss of rural land for productive purposes • Change in character from rural to industrial • Not in accord with Map A (CRPS) • Potential construction effects • Doesn't reflect the outcomes or goals of Policy 8 – NPS – Urban Growth which recognises Councils can in circumstances be (ie responsive to zoning changes) • Likely compromise development and transport options in the area • Neighbours will have reduced view

• Not dependent on the development of the land • Site likely to be last area of land undeveloped within this industrial area • After consideration (Refer Annexure E) a 20m separation is appropriate • Does not make efficient use of services already in place	
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Benefits and Costs of Option 3 – Rezone the land as Industrial General

Benefits /Advantages	Costs/Disadvantages
• Will potentially reduce amenity impact on the residential dwellings • Reduces the opportunity for a more efficient use outcome over both the subject land and the adjoining IH land now under development	• 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

Benefits and Costs of Option 4 – Develop the land by Resource Consent

Benefits /Advantages	Costs/Disadvantages
• Council may be able to place tighter controls on consents	• Lack of long term certainty and missed opportunity for activity, transport integration and industrial consolidation • Need for on-going consents and no certainty for future purchasers or the neighbourhood • Loss of the integration provided by the OPD • Failure to recognise the strategic, economic and transport advantages of SW Hornby for IH land • Consent granted that will undermine integrated development of land • Unwanted precedent by allowing industrial use in the zone through consent only

Benefits and Costs of Option 5 – Increase separation distance between Industrial zoning and existing residential dwellings

Benefits /Advantages	Costs/Disadvantages
• Would in the short term provide greater separation between business and the residential units • 20m setback aligns with City Plan standards and provides ample space	• Difficult to plan for future and coordinate with existing IH zoning • 20m will result in industrial built form being close to residential properties. However weight placed

for planting/parking, no shading on neighbours • Represents a short term outcome given the long-term outcome is that all the land will likely be Industrial • This is the last area of land in the area to be rezoned and will remove any close proximity between residential use and IH. The other/existing nearest residential zoning is 0.5km away • Refer also the RMM RFI response attached (Annexure E) • Other than the residential properties within the site no other residential properties are directly affected or would benefit • Likely to create an area of land unable to be used for industry and potentially redundant	on an pragmatic outcome given this is likely to be the last area of IH land to be developed in the locality • Will risk creating a strip of land which has a redundant use between industrial and residential • Is an interim outcome with all the land to the SHNo1 boundary proposed for IH zoning
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The above assessment highlights that the advantages and benefits of rezoning this area of land for Industrial use (Option 2) outweigh the potential costs and disadvantages. The costs or disadvantages of the other options indicate that they are not appropriate due to the nature, location, ground quality and uncertainty of the process.

10.4 Effectiveness

In determining the effectiveness of the Plan Change and other options to achieve the objectives, it is considered appropriate to include within “the objectives” the objectives of the relevant broader policy documents namely the NPS – UD, NPS-Highly Productive Land and the RPS. These objectives are particularly relevant because they set out, at a strategic level, how growth should be provided for within the Christchurch City. On this basis the proposed Plan Change is assessed to be the most effective method to achieve the objectives of the National Policy Statement—Urban Development, the City Plan, and the CRPS. In particular the proposed Plan Change is the best planning method to ensure all of the following:

- An industrial development of an appropriate area at a scale that can provide for a variety of section and business types meeting a potential developing shortfall in industrial land in one of the most preferred locations in the region,
- Development in accordance with an outline development plan
- Integration of development with existing infrastructure
- Specific amenity standards to be achieved in the final development for industrial activity in this area of Christchurch

10.5 Efficiency

In determining efficiency, it is necessary to compare the costs and benefits of the five options listed in the tables above. These costs and benefits relate to a variety of matters including environmental, process and land use compatibility. In relation to all these matters Option 2 has a greater number of benefits/advantages as compared to the alternative options. This is particularly so in terms of the recognition in Policy 6.3.6 of the PRS that industrial land supply has only been assessed through to 2028 and Policy 8 of the NPS-Urban Development which recognises the need for development capacity out of sequence.

10.6 Assessment Regarding Information Provided

There is a large amount of information available about the site and the effects of the proposed rezoning; as such it is considered that there are no risks in acting.

10.7 Overall Assessment

It could be argued that all of the options could have to a greater or lesser degree based on the above assessment, the overall conclusion is that the Proposed Plan Change is a more appropriate method for achieving the objectives and policies of the City Plan than the existing City plan provisions or the alternative options set out above. It is also concluded that the environmental, social and economic benefits of the Proposed Plan Change outweigh any of the costs. On this basis, the proposed rezoning is considered to be an appropriate, efficient and effective means of achieving the purpose of the Resource Management Act.

11. Conclusion – Part II of the Resource Management Act

The purpose of the Resource Management Act is set out in Section 5 being the sustainable management of natural and physical resources. Section 5 is also subject to Section 6, 7 and 8 which set out the matters taken into consideration. In respect of Section 6 (Matters of national importance), then none of the matters identified appear relevant for the site. In regard to Section 7 Maintenance and the enhancement and quality of the environment and amenity values, although the amenity values will change the assessment is that this change will be minor and can be mitigated, particularly given the context of the proposed zoning, the mitigation measures and the extended ODP. In respect of Section 7(b) and the efficient use of resources the sites location, size; accessibility will result in the proposed zoning being an efficient use of the land and surrounding resources (eg roading).

Overall the proposal to extend the Industrial Heavy Zone is considered to achieve the purpose of the Act and enhance the social and economic well-being of the area and the City with efficient, serviceable and accessible land, employment opportunities while avoiding and or mitigating any adverse effects. More specifically;

- The land does not qualify under the NP on productive soils (Annexures I and J) as potentially productive land
- It can be integrated into the existing service networks (Annexure F)
- It provides for the final arterial road link to SHNo1 and improves traffic safety and amenity

All adverse environmental effects can be mitigated

ANNEXURE A:
CERTIFICATE OF TITLE

ANNEXURE B:
ECONOMIC ASSESSMENT

ANNEXURE C:
RESEARCH REPORT

ANNEXURE D

INFRASTRUCTURE REPORT & RFI RESPONSE

ANNEXURE E

LANDSCAPE AND VISUAL IMPACT ASSESSMENT

ANNEXURE F
TRAFFIC ASSESSMENT

ANNEXURE G

GROUND CONTAMINATION REPORT

ANNEXURE H

GEOTECHNICAL ASESMENT

ANNEXURE I

AGRICULTURAL REPORT

ANNEXURE J

PRODUCTIVE LAND REPORT