PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 30/07/2026

First name: Thomas **Last name:** Blain

Prefered method of contact Postal

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Support all or part of the plan change

n/a

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

n/a

The reasons for my / our submission are: (use additional pages if required)

n/a

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

as well as shared path tie ins a shared path should be constructed on the whole length of the site road boundary and be separated by railling

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 05/08/2026

First name: Richard **Last name:** Allison

Organisation: Poppies Preschool

On behalf of:

Poppies Preschool 344 Gardiners Road

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

The rezoning of the land from RUF to IG which includes general manufacturing warehousing distribution and service industries

Visually the current landscape from John's Road is generally natural and appealing to the eye. There is no reason why suitable low growing buffer planting could not be made along the John Rd boundary to retain some of the natural appeal.

This planting would help screen any pollutants that may be created from any light manufacturing.

The reasons for my / our submission are: (use additional pages if required)

Our main concern we have comes from the use of General Manufacturing within the description of Industrial General proposed zoning

Our preschool "Poppies"(licenced for 69 children) celebrates our rural setting and our clean air being on the boundary of residential housing and Willowbank Park.

We do have a firewood processor and retaier to our West. However, we are not directly downwind in NorWest conditions

We do not have currently any issues with dust and/or other particles, micro plastics smoke and/or odour emissions.

If any airborne contaminant in future blew onto the preschool grounds it would be related to untreated wood .

"Natural and untreated " is not the norm today for manufacturing goods where chemicals and microplastics are used or produced during manufacturing .

If General Manufacturing was approved then we may be subject to the above (despite manufactures attempting to mitigate them to acceptable levels.)

For our Preschool children, no level of the above contaminants or emissions would be safe.

In summary ..any particle or odour emissions would effect the children and teachers immediately downwind . NW winds are typically higher in intensity than all other winds we receive.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

if rezoning is agreed we would like a condition that no emissions covered above in this submission are allowed to become airborne .

Low appropriate buffer planting along the boindary with John's Road

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 06/08/2026

First name: Jonathan **Last name:** Ludgater

On behalf of: Self

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

i oppse any such plan

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

This will impact residential areas

The reasons for my / our submission are: (use additional pages if required)

As above

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

do not approve this proposal

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 07/08/2026

First name: Ross **Last name:** Noble

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Industrial zoning is inappropriate in this location.

The reasons for my / our submission are: (use additional pages if required)

It would have negative transport impacts as well as ecology and amenity impacts, it is an inappropriate location for an industrial precinct.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

I would like the council decline the application in its entirety.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 07/08/2026

First name: Jenna **Last name:** Nielsen

On behalf of: Myself

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

As a homeowner within Clearwater Resort, I invested in this property because of the unique character of the area. Clearwater is not simply another residential subdivision. It is a purpose-designed golf resort community where residents, visitors and golfers enjoy a peaceful environment, expansive open spaces, attractive landscapes and a level of amenity that is increasingly rare within Christchurch.

The Christchurch District Plan specifically recognises the importance of Clearwater Resort as a golf resort of regional significance and seeks to ensure that development maintains the recreational function of the resort while avoiding significant adverse effects on the surrounding environment. It also recognises the need for adequate separation from adjoining activities to mitigate adverse effects.

Industrial zoning immediately adjacent to Clearwater is fundamentally inconsistent with these planning objectives.

While I acknowledge Christchurch requires additional industrial land to support economic growth and employment, that growth should occur in locations where it is compatible with surrounding land uses. Clearwater Resort is not one of those locations.

Industrial activities have the potential to generate significant adverse effects, including:

- Heavy truck movements throughout the day and night.
- Increased traffic congestion on surrounding roads.
- Noise from machinery, loading operations and vehicle movements.
- Security lighting and light spill affecting neighbouring properties.
- Dust, odour and vibration depending on the nature of future industries.
- Large industrial buildings and storage yards that dramatically change the visual landscape.
- A gradual erosion of the peaceful environment that residents and visitors currently enjoy.

The greatest concern is that industrial zoning creates uncertainty. While the Council may envisage only low-impact industrial businesses today, future landowners are entitled to establish a wide range of activities permitted within that zone. Residents are therefore not being asked to assess one specific proposal—they are being asked to accept decades of unknown industrial development immediately beside a premium residential and recreational environment.

This proposal also has broader implications for Christchurch.

Clearwater Resort has become one of the city's premier residential and golfing destinations. It attracts visitors, supports tourism, hosts events, and contributes significantly to Christchurch's reputation. Much of its appeal stems from its tranquil rural outlook and separation from intensive urban and industrial activities. Introducing industrial development on its boundary risks permanently undermining one of the city's unique recreational assets.

Many residents, myself included, made substantial financial commitments based on the existing planning framework and the expectation that the surrounding rural setting would remain compatible with the purpose of the Golf Resort Zone. While property values alone should not determine planning outcomes, the loss of amenity resulting from adjacent industrial activities is likely to have a direct and lasting impact on both property values and homeowners' confidence in long-term planning decisions.

Good planning requires compatible land uses. Residential and recreational environments should be buffered from intensive industrial activity wherever practical. Once industrial zoning is established, the character of an area can never realistically be restored.

For these reasons, I respectfully request that the Council decline the proposed industrial rezoning.

Should the Council nevertheless decide to proceed, I request that, at a minimum:

A substantial landscaped buffer be established between industrial land and Clearwater Resort.
Building heights be limited adjacent to the resort.
Strict controls be imposed on noise, lighting, outdoor storage, hours of operation and heavy vehicle movements.
Significant setbacks be required to preserve visual amenity.
Only low-impact industrial activities be permitted adjacent to the resort.

The decisions made through this planning process will shape this area for generations. I urge the Council to protect the unique environmental, recreational and residential qualities of Clearwater Resort by ensuring incompatible industrial activities are directed to more appropriate locations.

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Change of zoning

The reasons for my / our submission are: (use additional pages if required)

As stated aboce

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

no change to zoning

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 10/08/2026

First name: Leslie **Last name:** Browne

On behalf of: My husband and I.

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

private Change 24 -Johns Rd -the 200 Industrial sites Industrial General subdivision proposed. 1

The reasons for my / our submission are: (use additional pages if required)

1. THE WATERWAYS. Spillage from any of the Industrial sites could find its ways into rhe rivers and lakes and very negatively impact the bird and wildlife living on those waterways. This would affect the Groynes, Clearwater and the recreational lakes and waterways that are accessed from Greywacke Rd and Sawyers Arms rd.
2. TRAFFIC. It is already problematic exiting Clearwater Avenue at certain times of the day. Traffic leaving the Industrial subdivision would have to turn left and travel to the Clearwater roundabout whether intending to travel left or right which would make it extremely difficult for resident, golfers and service vehicles to exit Clearwater Avenue.
3. UNNECESSARY. There is already plenty of land available zoned foor Industrial General nearby and elsewhere in the city.
4. It does not meet the threshold of policy 8 of the National Policy Statement of Urban Development.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages

if required)

6

We are completely opposed to this application for Private Change 24 and it should be absolutely declined.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 11/08/2026

First name: Laura **Last name:** Barrington

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Traffic is already crazy on Johns road and the roundabout by Gardiners Road, it is busy on Gardiners Road onto Sawyers arms. There are preschools near and we need to keep the children safe and allow the parents to get to work and not be trapped in traffic.

The reasons for my / our submission are: (use additional pages if required)

as above

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

Decline the plan

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 25/08/2026

First name: Paul **Last name:** Jackman

On behalf of: self

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

I oppose PC24 completely and request that it be declined in full.

The proposed rezoning is not based on a thoroughly verified and quantified need for more industrial space along this section of Johns Road. Critically, it has not been researched sufficiently in terms of its potential harm to the fragile ecology of the Otukaikino Stream and extensive nearby conservation area established in 1957 and managed by The Isaac Conservation and Wildlife Trust since 1977.

Likewise, the potential negative impacts on existing neighbours such as the Clearwater Resort and Golf Course and private residents along Clearwater Drive n terms of noise, nighttime lighting and traffic volumes have not been adequately considered and assessed to a level that could give Council, the affected parties and ratepayers in general, any confidence that these will be minimal.

If the application were to be successful it would irrevocably and permanently alter the rural character of the area and put a nationally significant ecological area at risk without any clearly established need for such a development in the first place..

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Ecological impact/damage.

Lack of verified need for change including assessment of alternatives.

Unassessed or insufficiently assessed impacts on existing neighbours and lawful neighbouring activities.

Permanent nature of the proposed change and precedent that it sets.

The reasons for my / our submission are: (use additional pages if required)

I am a resident at Clearwater Resort.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

I urge Christchurch City Council to decline this application in full.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 13/08/2026

First name: Stuart **Last name:** Lumsden

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

I oppose the rezoning of the land from rural urban fringe to industrial general

The reasons for my / our submission are: (use additional pages if required)

My experience has been that industrial land makes for bad neighbours. Smiths Cranes, which is beside this proposed change, have no concern for the community across the road from it. They have burn offs creating pollution. In a northwest wind their unsealed site becomes a dust storm. The noisily move cranes in the very early hours of the morning and their hourly sirens are not turned off over the weekend. The last thing we need is more industrial noise and air pollution. Their is already enough industrial land available in Christchurch without this change occurring.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

I oppose PPC24 and request that it be declined on full

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 13/08/2026

First name: Lisa **Last name:** Goodland

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

I oppose PPC24 and request that it be declined in full.

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

zone change from rural urban fringe to industrial

The reasons for my / our submission are: (use additional pages if required)

- a lot more traffic and noise - we currently experience significant noise from the recently widened motorway - enough to disrupt sleep when the wind is blowing in a northwesterly direction. Johns Road already experiences significant traffic jams at certain times of the day, which will be exacerbated by this zone change.

- loss of rural character - we purchased in this area 20 years ago, to enjoy the rural landscape and lifestyle of Northwood and Harewood. Currently we are experiencing pressure from subdivision expansion at the Harewood/Casebrook edge of our neighbourhood. We have experienced pressure from traffic due to the motorway expansion on the other edge of our neighbourhood. This will further cause a decay of the rural lifestyle we had sought.

- risks to our waterways - the existing waterways and wetlands in the area are already under pressure from development in Belfast. Industrial use so close to a sensitive natural landscape is retrograde and archaic.

- wrong direction - as mentioned above - Industrial use so close to residential and natural features is retrograde and archaic. There is other industrial land nearby which can be utilised, without pressing into sensitive environments.

10

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

I would like the Council to deny the application to change zoning of 370-448 Johns from rural urban fringe to Industrial.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 17/08/2026

First name: Trevor **Last name:** Bromley

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

I appose PPC24 and request that it be declined in full.

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

I appose PPC24 and request that it be declined in full.

The reasons for my / our submission are: (use additional pages if required)

At present when the wind blows North West we have to keep our windows shut because of the dust and sand that come from the Smiths Cranes site.Any further unknown industrial sites will no doubt exacerbate that problem .

There are many more dedicated industrial sites around the city , without having to encroach on that land.

That is a well used piece of rural fringe that should not be taken for industrial use.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

to decline PPC24.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 17/08/2026

First name: Nancy **Last name:** Greensmith

On behalf of: Concerned resident

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

There should be no change to present Rural Urban Fringe Zoning.

The reasons for my / our submission are: (use additional pages if required)

This would take away a lot of the Green belt and encroach into a large green area on Johns Road.Issac ConservationWalkway Trail Clearwater Golf Course and The Groynes for example.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

I oppose PPC24 and request that it be declined in full.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 18/08/2026

First name: Mary-Anne **Last name:** Beckingsales

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

There has been an inordinate amount of land development in the Styx / Hussey Road / Gardiners Road area in the last 5-6 years. This has affected the wildlife - of which this is their home, to an unacceptable degree.

The reasons for my / our submission are: (use additional pages if required)

I believe the wildlife that are native to this area deserve to have people advocate for their protection. I was recently walking my dog along Hussey Road when I came across a Pukeko that had clearly been hit by a car sustaining a broken wing and was lying on the side of the pavement. Thankfully because of the proximity to Willowbank Vet Hospital, I was able to ring for assistance and the bird was taken - hopefully to be nursed back to health, if this was possible.

Development is hurting these beautiful creatures and we have a responsibility to stop this carve up of our land for a concrete jungle as an alternative.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

Leave the land as it is and develop outside the residential areas that needs to be prioritised for wildlife not buildings.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 20/08/2026

First name: Lenore **Last name:** FARRELLY

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Rezone of Rural Urban Fringe to Industrial - Johns Road. I oppose PPC24 and request that it be declined in full.

The reasons for my / our submission are: (use additional pages if required)

I oppose PPC24 and request that it be declined in full. The impact this change will have on the area is massive, our roads are already stretched to capacity from significant growth. The industrial activities will create dust, noise, traffic. And the risk to our waterways is completely avoidable, the effect on our conservation is huge - we are meant to be protecting and nurturing our land not polluting it.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

I oppose PPC24 and request that it be declined in full

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 21/08/2026

First name: Susan **Last name:** Bliss

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

I oppose PPC24 and request that it be declined in full.

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

This site has not been identified for urban growth in the Canterbury Regional Policy Statement or Christchurch District Plan.

The reasons for my / our submission are: (use additional pages if required)

Loss of rural character - we already find that the rural area has been reduced dramatically. Clearwater Resort and golf course are located nearby and with noise, lighting and dust - this would not be a pleasant place to stay and would cease to be one of Christchurch's prestigious resorts.

Effect on 'The Groynes' would be damaging as the Wetlands area is sensitive.

Traffic volumes would increase considerably with trucks and cranes. Also the time they start work will increase noise volumes for those nearby.

The benefits to a company who have a preference for freehold in one locality do not outweigh the destruction of rural area/wetlands. Clearwater resort would have been build knowing there was no industrial site which would impact them in the future.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

15

I would like the council to oppose PPC24 - Johns Road.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 25/08/2026

First name: John **Last name:** Spearpoint

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Please see attached submission and objection

The reasons for my / our submission are: (use additional pages if required)

Please see attached submission and objection

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

Reject the proposal in its entirety

Attached Documents

Name
Submission AND Objection to a Private Plan Change PPC24 Johns Road

Submission AND Objection to a Private Plan Change (PPC 24)
370-448 Johns Road, Russley, Christchurch (JRCD Limited)

To:

City Planning Team
Christchurch City Council
PO Box 73012
Christchurch 8154

Submitter Details:

Dr John Spearpoint
4/54 Rotoiti Lane
Northwood 8051

Declaration of Submitter's Interest

1. This submission is made jointly by John and Janelle Spearpoint, residents of 4/54 Rotoiti Lane, Northwood, within the Clearwater Resort precinct.

2. We object to the proposed plan change in its entirety for the reasons set out below.

3. We declare that we are making this submission as affected residents, not as parties with any trade competition interest in the outcome of the plan change.

4. As residents of Clearwater Resort, an established residential community with a single access point to State Highway 1 (SH1), we have a direct interest in the Proposed Plan Change. The proposed industrial development will materially affect our quiet enjoyment of residential living and will introduce traffic congestion, industrial noise, and potential groundwater contamination that directly impacts Clearwater Resort residents. Our objection is made on the grounds that the proposal creates unacceptable reverse-sensitivity effects on an established lawful residential use and fails to adequately assess or mitigate environmental effects that will directly affect our property and community.

5. If a hearing is held, we would be prepared to present our case and to consider presenting jointly with other affected Clearwater Resort residents on shared concerns.

Provisions of the plan change that our submission relates to:

6. This submission addresses material gaps in the applicant's assessment of effects on Clearwater Resort, an established residential community directly affected by the proposal. Specifically, the submission relates to: ecology and waterways, stormwater and groundwater management, traffic and congestion, noise, and reverse-sensitivity

effects on established residential use.

7. The applicant's assessment does not identify Clearwater Resort as an affected party and provides no evaluation of effects on Clearwater residents. This represents a fundamental failure to meet RMA s32 requirements for adequate assessment of environmental effects.

Reasons for our submission

Ecology and Waterways

8. Hedges Waterway flows through the northern corner of the Plan Change site and extends downstream toward boundaries with Clearwater Resort. The Ötükaikino Stream is classified as a site of Ecological Significance and contains At-Risk native fish habitat.

9. The assessment acknowledges the waterway has "ecological values" and notes existing dissolved oxygen within the waterway is "below target" (41.9% vs 70% target). The waterway is already failing to meet ecological standards, so additional stormwater discharge, particularly sediment and nutrient loading from industrial hardstands, has the potential to further degrade the waterway's ecological condition.

10. Within a short distance downstream of the Plan Change site is a recognised spawning habitat for a threatened and declining native fish species *(Galaxias vlugaris)*. No ongoing monitoring, triggering mechanisms or mitigation measures are proposed to preserve this habitat.

11. Spring water assessments are incomplete. The applicants claim that springs are 'upgradient' and therefore unaffected cannot be verified, as the applicant explicitly notes *"access to this part of the site is not possible at this time"* (Section 101). The applicant indicates *"appropriate mitigation measures can be appropriately managed so to avoid adverse effects on the aquatic ecology"*. This deferred assessment approach is inadequate and pre-development spring mapping should be a pre-requisite condition, not a post-approval task.

12. The applicant indicates riparian zone planting *"is sufficient to provide protection and enhancement",* without providing any detail on who is ultimately responsible for planting, development and ongoing management of this zone to achieve environmental protection. The ODP imposes a 20m setback and 10m riparian planting requirement across multiple industrial titles, but provides no mechanism for enforcement, funding, or long-term liability. This fails to identify clearly responsible parties for environmental protection measures and renders the mitigation unenforceable.

13. The proposal cannot be approved because: (1) it will cause further degradation of a waterway already in breach of water quality standards; (2) it offers no protection for At-Risk fish habitat; (3) spring effects cannot be assessed as written; and (4) riparian zone management is unenforceable across fragmented titles. Each of these constitutes grounds for decline under RMA s25(4)(c).

Stormwater management

14. The site is underlain by near-surface sandy gravels suitable for on-site soakage (Section 34). This high-permeability substrate creates direct pathways for contaminated stormwater to reach groundwater. Industrial stormwater typically contains heavy metals, hydrocarbons, and suspended solids.

15. Section 92 identifies groundwater flows generally eastward, with recharge from the Waimakariri River. The applicant provides no modelling of how contaminant transport pathways operate under these conditions, or whether lateral flow or seasonal variations could affect groundwater users to the east and northeast (including Clearwater Resort).

16. The applicant defers groundwater interaction and stormwater quality assessment to the subdivision stage. No baseline groundwater quality has been sampled, no attenuation modelling has been provided, and no trigger mechanisms exist for remediation if contamination occurs. This violates RMA s32, which requires plan changes to be based on adequate environmental assessment.

17. We object to the proposed stormwater approach. The application cannot be approved without complete groundwater and stormwater interaction assessment demonstrating no adverse effects on groundwater quality.

Traffic and congestion

18. The proposal acknowledges existing congestion at Sawyers Arms Road roundabout and SH1 corridor. The ITA projects an additional 176 vehicles/hour during peak periods (Section 112). However, the applicant does not disclose the worker density, arrival/departure distribution, or industrial mix assumptions underlying this figure. Without this transparency, the projection cannot be verified.

19. A more realistic traffic generation can be estimated from the site capacity (approximately 200 lots supporting ~800-1,000 workers). Industrial operations concentrate worker arrivals in a 60-90 minute morning window (7-9am) and departures in a 120-minute evening window (4-6pm). If 60-70% of departures cluster in 4-6pm, plus delivery/visitor and heavy vehicle traffic, peak-hour departures likely reach 400-500 vehicles/hour, which is significantly higher than the 176 vehicles/hour modelled by the ITA.

20. Clearwater Resort is an established residential community with a single egress point onto SH1 via the Clearwater Avenue roundabout. The concentration of 400-500 vehicles/hour departures into a single SH1 intersection will create northbound congestion during peak afternoon periods, preventing Clearwater residents from reliably exiting and blocking visitor/emergency access. This materially compromises emergency and routine access to an existing established residential use, breaching the District Plan Policy on reverse sensitivity protection. Council cannot approve development that creates unsafe conditions or materially impairs emergency response capability to an adjacent residential community.

21. Final intersection design and NZTA consultation are deferred to subdivision stage. This reverses the proper consenting sequence whereby RMA s34 requires consultation *before* plan change approval. The Plan Change cannot be approved until NZTA confirms the SH1 intersection can safely accommodate projected traffic generation. Deferral creates planning uncertainty and prevents meaningful review of actual network effects before zoning approval.

Noise

22. NZS 6802:2008 Environmental Noise establishes permitted noise limits for new industrial land uses adjacent to existing residential uses: 50-55 dB daytime, 45 dB night-time. The applicant has not provided noise modelling to assess compliance with these limits. Industrial activities on this site may include; machinery, compressors, forklifts, angle grinding, hydraulic equipment, all generating continuous ground-level noise. Without modelling and demonstration of mitigation measures (source control, operational restrictions, or acoustic barriers), the proposal cannot be assessed for compliance. Unmitigated industrial noise will clearly exceed residential limits.

23. No acoustic buffer or noise mitigation is proposed between the industrial site and Clearwater Resort. The applicant has not assessed whether:

    - Source mitigation (equipment selection, operational restrictions, hours of operation) can achieve 55/45 dB limits
    - A permanent acoustic barrier is required
    - Vegetation buffers (proposed for riparian management) are adequate for noise control

    Vegetation only provides 3-5 dB attenuation over 20-30 metres after 10+ years and is unsuitable for high-frequency industrial noise. A purpose-built acoustic barrier would likely be required; none is proposed.

    The proposal zones the site 'Industrial General' which permits activities ranging from light assembly to logistics/warehousing to fabrication/manufacturing. The applicant has not specified which uses are anticipated or specified permitted activities. Different industrial uses generate vastly different noise profiles: without this, noise compliance cannot be assessed.

    The Plan Change should either (a) restrict activities to those demonstrably complying with NZS 6802:2008 residential limits through design or operational controls, or (b) require acoustic barriers for all non-compliant uses, with specifications provided at Plan Change approval stage.

24. Clearwater Resort is an established residential community pre-dating consideration of industrial zoning in this location. The proposal will introduce persistent, ground-level industrial noise fundamentally incompatible with the character and use of Clearwater Resort. This constitutes an unacceptable reverse-sensitivity effect on an existing established residential use.

25. We object to the proposal on grounds of non-compliance with NZS 6802:2008, absence of noise modelling and mitigation assessment, and unacceptable reverse-sensitivity effects on Clearwater Resort residents.

Loss of rural buffer zone

26. The proposal rezones the RUF buffer zone between existing Industrial General zoning and Clearwater Resort to Industrial General, materially diminishing the separation between industrial activity and established residential use.

27. We object to the conclusion that the site *"reinforces existing adjacencies"* and *"does not introduce any new zone boundaries that would create abrupt or sensitive transitions"*. The existing rural buffer zone between the existing industrial zone and Clearwater Resort provides important amenity and a transition buffer between different land uses. Rezoning to Industrial General constitutes an unacceptable reverse-sensitivity effect on Clearwater Resort.

28. A visual impact assessment has not been conducted to determine whether industrial structures on the site will be visible from Clearwater Resort residential buildings, and what landscape mitigation would be required to avoid material visual impact. Without this assessment, the proposal cannot be approved.

Economic justification – Insufficient Need for Rezoning

29. The proposal cites lack of vacant freehold industrial land in Harewood North as justification for rezoning. The Greater Christchurch Partnership Business Development Capacity Assessment (April 2023) identifies:
    - 627 hectares short-term industrial land surplus in Christchurch
    - 544 hectares long-term surplus
    - Total zoned supply of 778 hectares, with only partial utilisation expected
    - Declining demand for industrial land due to global economic trends

    This indicates sufficient industrial land supply exists to meet projected needs for 30+ years.

30. RMA s32 requires plan changes to demonstrate that the proposed provisions are *"the most appropriate way to achieve the objectives"*. Rezoning RUF land is not the most appropriate way to achieve industrial land supply when sufficient capacity exists elsewhere at lower environmental and social cost.

31. The applicant argues that other locations (Harewood South, other industrial zones) are 'unsuitable' for the activities that would locate here. However, the applicant provides no evidence that:

    - Specific industrial activities *cannot* operate in alternative locations
    - The site's Harewood North location is essential (as opposed to preferred) for the type of activities proposed

- Alternative accessible industrial locations have been systematically eliminated

This is developer locational preference, not justification for rezoning under RMA s32.

32. RMA s32(2)(b) requires assessment of whether benefits outweigh costs. The applicant's economic justification (land supply, competition, employment) does not address the costs imposed on Clearwater Resort residents:

    - Loss of buffer zone and amenity (traffic, noise, visual change)
    - Reverse-sensitivity effects on established residential use
    - Potential property value depreciation from industrial noise exposure
    - Inadequate mitigation measures

    The applicant has not conducted a cost-benefit analysis weighing regional industrial land supply benefits against localised reverse-sensitivity costs to Clearwater residents. Without this analysis, the proposal fails the s32(2)(b) efficiency test.

33. We object to the proposal as failing to meet RMA s32 requirements that plan changes be based on adequate assessment and demonstrate that proposed provisions are the most appropriate way to achieve objectives.

The proposed plan change should be declined.

The proposal fails to demonstrate compliance with RMA s32 and creates unacceptable reverse-sensitivity effects on Clearwater Resort (an established residential use) through traffic congestion, industrial noise, and loss of buffer amenity.

Yours sincerely



Dr John Spearpoint

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Grant **Last name:** O'Neill

On behalf of:

Myself and Family and Friends of Clearwater and

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing: I strongly object to .....210 The Conclusion (a thru h) and would like the opportunity to discuss this further. Thankyou Grant O'Neill

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

see below

The reasons for my / our submission are: (use additional pages if required)

Introduction and Submitter's Interest

1.

2. This submission is made on behalf of Grant O'Neill ("the submitter"). The submitter objects to the Plan Change in its entirety, and to each of its constituent provisions, for the reasons set out below.

3. Clearwater Golf Club has 600 members and is located at Clearwater Resort, 38 Clearwater 38 Clearwater Avenue, Northwood, Christchurch 8051. It is projected that 32,000 rounds of golf will be played at Clearwater during the year ended 31 December 2006 – of which 23,000 will be member rounds; and 9,000 will be visitor rounds.

4 The submitter is not in a position to gain an advantage in trade competition through this submission.

5. The applicant has undertaken no consultation with the submitter on the proposed Plan Change.

6. The location of Clearwater Resort in relation to the applicant's land is highlighted in the image below.

7. The submitter has a direct interest in the Plan Change as the operator of Clearwater Golf Club, whose members, visitors and guests rely on the existing rural and open space character and ecological amenity of the surrounding area including the Groynes, Isaac Conservation Park, Waimakariri River Regional Park, and Lake Roto Kohatu.

8. The submitter's interests span recreation, tourism and hospitality, and landholding, and are directly and materially affected by the traffic, noise, ecological, lighting, visual, air quality and reverse sensitivity effects addressed in this submission. All are activities lawfully established well in advance of the Plan Change request.

9. This submission is structured by topic, addressing ecology and waterways, stormwater management, services, traffic and transportation, noise, lighting and night sky, visual and landscape effects, air quality and dust, reverse sensitivity, loss of open space and rural-urban character, and the economic case advanced in support of the Plan Change. 10. The submitter reserves the right to supplement this submission with independent expert evidence, including acoustic, traffic engineering, ecological, and landscape evidence, and requests the opportunity to be heard further in support of the matters raised. If others make a similar submission, the submitter will consider presenting a joint case with them at a hearing. Statutory Framework 11. This submission is made having regard to the framework applicable to a private plan change request under Part 2 of Schedule 1 to the Resource Management Act 1991, including the Council's discretion to accept, adopt or reject the request under Clause 25, the requirement for an evaluation report under Section 32, the matters the Council must consider under Sections 74 and 75, and the higher-order documents identified by the applicant itself as relevant, including the National Policy Statement on Urban Development 2020, the National Policy Statement for Submission on Proposed Private Plan Change 24 — Johns Road Page 3 of 10 Freshwater Management, the Canterbury Regional Policy Statement, the Greater Christchurch Spatial Plan, and the Mahaanui Iwi Management Plan 2013. Ecology and Waterways (Ōtūkaikino Stream Catchment and Downstream Receiving Environments) 12. The site adjoins, and its northern corner intersects, a tributary of the ecologically significant Ōtūkaikino Stream. This is treated as a priority area of scrutiny given the direct and cumulative downstream connection to a site of Ecological Significance and mapped At-Risk native fish habitat. 13. Existing water quality in the Ōtūkaikino Stream and its tributaries are already below the relevant regional plan target, raising a precautionary concern about additional contaminant and sediment loading from heavy industrial land use. Additional stormwater discharge, sediment, or contaminant loading associated with heavy industrial subdivision and use has the potential to further degrade an already-stressed waterway. The submitter objects that the proposal has not adequately assessed the capacity of an already degraded waterway (dissolved oxygen below the regional plan target) to absorb the additional contaminant and sediment loading reasonably anticipated from heavy industrial subdivision and use of the scale proposed. 14. A threatened native fish species' spawning habitat lies a short distance downstream of the site within the same waterway system. No species-level monitoring, triggers, or adaptive management mechanism is proposed to detect or respond to adverse effects on this habitat arising from construction or ongoing operational discharges. The applicant's position is that the presence of the habitat is acknowledged and noted as a potential cumulative effects receptor (paragraph 91), but no species-specific monitoring or adaptive management response is proposed in the Plan Change provisions. The submitter objects that no monitoring or adaptive management mechanism has been proposed to protect the mapped At-Risk Canterbury galaxias spawning habitat located a short distance downstream of the site, notwithstanding the scale of development enabled. 15. The riparian margin protecting the waterway relies on a 20m development setback and 10m planting buffer rather than a more robust and enduring protective mechanism, and no long-term funding, maintenance or enforcement mechanism is specified. The applicant's position is that the 20m buffer is 'sufficient to provide protection and enhancement' notwithstanding the more protective zoning option being rejected on the stated basis of Council's reluctance to accept land ownership. No mechanism (such as a consent notice, covenant, or body corporate maintenance obligation binding all future lot owners) is specified to ensure the buffer planting is established, survives, and is maintained in perpetuity once the site is subdivided into numerous individual industrial titles. 16. Erosion and

sediment control during construction is not addressed by specific plan-change-level standards. Given the scale of earthworks anticipated for a 19ha, up to 200-lot industrial subdivision adjoining a waterway and wetland already below water quality targets, uncontrolled or inadequately controlled construction-phase sediment discharge represents a material risk to receiving waters. No specific performance standards, monitoring frequency, or enforcement pathway is proposed within the Plan Change itself - the safeguard is wholly reliant on a Submission on Proposed Private Plan Change 24 — Johns Road Page 4 of 10 subsequent, separate consent process not yet before Council. The submitter objects that construction-phase erosion and sediment control is not addressed by any specific standard within the Plan Change itself, notwithstanding the scale of earthworks anticipated adjoining a sensitive waterway and wetland. 17. Investigation of potential springs feeding the on-site waterway is incomplete, with the relevant part of the site not accessed, yet the report concludes springs are 'not expected to be impacted'. Groundwater interception or disturbance during earthworks and subdivision could adversely affect spring-fed hydrology supporting the waterway. The applicant relies on existing District Plan subdivision rules to require spring investigation at the time of future subdivision - the matter is deferred rather than resolved. The submitter objects that the conclusion that springs feeding the waterway will not be adversely affected is not yet supported by completed investigation, given the relevant area of the site has not been accessed. Stormwater Management 18. Stormwater management relies on discharge to ground via soakage, without current groundwater level data. The absence of current groundwater level data introduces uncertainty as to which stormwater management approach will ultimately be required, and whether soakage-based discharge will perform adequately across the site given variable groundwater conditions. No detailed stormwater design has yet been prepared, tested, or subjected to independent review. The submitter objects that the feasibility of the proposed stormwater management approach has not been demonstrated with current groundwater data, detailed design and independent review. 19. The applicant identifies groundwater flow direction as “generally to the east”, potentially towards Clearwater Resort to the northeast. The applicant’s stormwater approach defers detailed design assessment to subdivision stage which poses a significant risk of contaminants from the site travelling towards areas where residential, recreational, and other sensitive uses exist. Services 20. The PC24 site is not currently serviced by the reticulated wastewater network. The proposal was originally submitted seeking Industrial Heavy zoning but was subsequently dialled back in direct response to identified wastewater constraints. The submitter suggests that any connection to the Council system should be applicant funded and subject to elevated development contributions. The applicant has provided network capacity modelling which indicates that, under an ultimate growth scenario, Council wastewater network thresholds will be exceeded, however no immediate upgrades are proposed as part of the Plan Change. Submission on Proposed Private Plan Change 24 — Johns Road Page 5 of 10 Traffic and Transportation 21. The site fronts, and gains access from, a section of State Highway 1 / Johns Road that also serves as the primary access corridor for Clearwater Resort via the Clearwater Avenue intersection. 22. The applicant's own traffic modelling identifies increased delay specifically at the SH1 Johns Road / Clearwater Avenue intersection - the gateway intersection serving the golf course, resort and residential community - yet this has not been assessed in the context of golf, resort or eventrelated traffic patterns. The modelling predicts an increased PM peak northbound approach delay at the Clearwater Avenue intersection from 34 seconds to 52 seconds. No assessment has been presented of how this increased delay interacts with existing traffic patterns generated by Clearwater residents, golf club members and visitors (including tee-time clustering), resort guest arrivals/departures and functions, or tournament and event days when traffic volumes at this intersection are materially higher than an average weekday. The submitter objects that the increased delay identified at the SH1/Clearwater Avenue intersection has not been assessed against golf club, resort and event-related traffic patterns, which are the periods of greatest relevance and sensitivity to the submitter's operations. 23. No assessment has been presented of the interaction between new industrial heavy vehicle movements and existing recreational and resort-related vehicle movements along Johns Road / SH1 and at the Clearwater Avenue intersection. The proposal is predicted to generate 176 vehicle movements per hour at peak times, comprising 147 light and 29 heavy vehicle movements. No specific assessment addresses how these movements, including heavy vehicles associated with subdivision development and ongoing industrial activity, will interact with golfers, residents, and resort guests using the shared path facilities identified as linking to the site. Road safety auditing is deferred to a future detailed design stage rather than informing the current assessment. This is relevant to road safety and the submitter objects that the interaction between new heavy vehicle movements and existing vehicle movements has not been specifically assessed. 24. The proposal adds to an already acknowledged, unfunded network congestion issue at the Sawyers Arms Road roundabout,

contrary to the RPS's own stated environmental outcome for network congestion management. The submitter objects that the proposal adds to an already unfunded and acknowledged network congestion issue on the SH1 corridor, contrary to the Regional Policy Statement's own stated outcome for network congestion management, without adequate assessment of cumulative effects. 25. The design of the site access intersection with SH1 is not finalised and is deferred to a future subdivision detailed design stage, subject to further NZTA consultation. There is a risk that the ultimately agreed design could differ from what is currently relied upon to support the traffic conclusions in this report. The submitter objects that the Plan Change is being advanced on the basis of an unresolved, concept-level intersection design that remains subject to further agreement with NZTA. Submission on Proposed Private Plan Change 24 — Johns Road Page 6 of 10 26. No independent traffic assessment has yet been obtained to test the applicant's modelling assumptions. The traffic conclusions rely entirely on modelling commissioned by the applicant (Novo Group's ITA, supported by QTP modelling). No independent verification of trip generation rates, distribution assumptions, or intersection modelling has been undertaken on behalf of affected parties. Noise 27. The Plan Change does not propose any site-specific noise rules calibrated to the interface with Clearwater Resort. 28. No site-specific noise limits, measurement locations, or attenuation requirements are proposed for the interface between future industrial activity and the adjoining golf course, resort and residential receiving environment. Standard Industrial General zone noise standards are typically calibrated primarily to a residential interface. No assessment has been presented of whether those standard limits, measured at standard locations, adequately protect the specific and different sensitivities of an outdoor resort environment and overnight guest accommodation at the resort, both of which may be more sensitive to certain noise characteristics (e.g. early morning start-up noise, reversing alarms, intermittent impulsive noise) than a standard residential dwelling. The submitter objects that no site-specific noise assessment or rule has been proposed for the interface between the proposed industrial zoning and the adjoining golf course, resort accommodation and residential community, notwithstanding that other interface effects (setbacks, landscaping) have been specifically addressed. 29. Construction-phase noise and vibration during subdivision earthworks, wetland works, and intersection/road construction has not been assessed. Construction of a 19ha subdivision, including intersection upgrade works on SH1 and stormwater management area earthworks, will generate a sustained period of construction noise and vibration in proximity to outdoor recreational activity and overnight guest accommodation, both activities for which disturbance has a direct commercial and experiential impact. This matter does not appear to have been specifically addressed by the applicant. The submitter objects that construction-phase noise and vibration effects on the golf course and resort have not been assessed. 30. No assessment has been presented of night-time or extended-hours operational noise, notwithstanding the Industrial General zone can permit extended hours of operation. The resort's residential and overnight guest accommodation is a noise-sensitive activity for the full 24-hour period, in a manner different from standard residential exposure patterns. No operational hours restriction or night-time noise standard specific to this interface has been proposed. The submitter objects that night-time and extended-hours operational noise effects on the resort's overnight guest accommodation have not been assessed. Lighting and Night Sky 31. The applicant expressly acknowledges that no controls over night-time lighting are proposed, and that light pollution 'may eventuate', without assessing the specific effect on the golf course, resort Submission on Proposed Private Plan Change 24 — Johns Road Page 7 of 10 or residential amenity. Uncontrolled industrial lighting adjoining a golf course and a resort that relies on a rural, dark, open outlook as part of its accommodation and hospitality offering has the potential to materially change the night-time character and visual amenity experienced by golf course users at dawn/dusk periods, and by resort guests from accommodation, function spaces and grounds. The submitter objects that no lighting controls are proposed for the interface with the golf course and resort, notwithstanding the applicant's own acknowledgment that light pollution may result. Visual and Landscape Effects 32. The landscape and visual assessment's conclusion that effects are acceptable is not tested from golf-course or resort-specific viewpoints. The general conclusion that the site 'reinforces existing adjacencies' and does not create 'abrupt or sensitive transitions' is reached at a broad landscape-character level. It does not specifically evaluate the visual experience from golf course fairways, greens, and clubhouse areas, or from resort guest accommodation, function spaces and grounds, where the working industrial subdivision would become part of the visible outlook in place of the existing open pasture and rural character. The submitter objects that the landscape and visual assessment does not include analysis from specific golf course and resort viewpoints. Air Quality and Dust 33. Dust management relies solely on future Regional Air Plan consenting, with no plan-change-level dust management conditions for the construction phase. Construction of a 19ha, up to 200-lot industrial subdivision, including

significant earthworks, has clear potential to generate airborne dust. A golf course is a use particularly sensitive to airborne dust and particulate deposition, which can affect turf health, playing surface quality, and player experience, in addition to general amenity effects on residents and resort guests using outdoor grounds and facilities. The submitter objects that construction dust effects on the adjoining golf course, a particularly dustsensitive land use, have not been specifically assessed. 34. No assessment has been presented of odour or air discharge risk associated with the range of activities that could establish under the Industrial General zone, in relation to outdoor recreation and accommodation receptors. The Industrial General zone permits a wide range of activities, several of which have the potential to generate odour or air discharges (e.g. certain manufacturing, processing, or storage activities). No assessment has been presented of this risk in relation to a receiving environment that includes outdoor recreational activity. The submitter notes, and reserves the right to expand upon with further evidence, a concern that the range of activities enabled by the Industrial General zone has not been specifically assessed for odour or air discharge risk to the adjoining golf course and resort. Submission on Proposed Private Plan Change 24 — Johns Road Page 8 of 10 Reverse Sensitivity 35. The applicant's Reverse Sensitivity assessment addresses only Christchurch International Airport, NZTA, and generic Rural Urban Fringe land — it contains no specific analysis of the golf course, resort, or residential estate, despite these being identified in the applicant's own site description as immediately adjoining and nearby land uses. Heavy industrial-type activity established directly opposite and adjacent to an operating golf course and integrated resort creates a foreseeable risk that new industrial occupiers may, over time, generate complaints about existing, lawful golf and resort operational activities (for example, early morning course maintenance, mowing, irrigation, spraying, functions and events, or floodlighting for evening functions), creating pressure to constrain those pre-existing lawful activities. The submitter objects that the Plan Change's Reverse Sensitivity assessment omits any specific analysis of the golf course, resort or residential estate, notwithstanding these being identified as immediately adjoining or proximate land uses in the applicant's own site description. 36. No mechanism is proposed to manage future complaint risk from new industrial occupiers toward the pre-existing lawful golf, resort and residential activities. Without a mechanism such as a reverse sensitivity acknowledgment registered against future industrial titles (recording the presence of, and accepting the lawful effects associated with, the adjoining recreation and tourism activities), there is a risk that new industrial occupiers, unaware of or unaccustomed to an adjoining recreation and tourism environment, could later seek to restrict lawful golf course or resort operations through complaint. The submitter objects that no reverse sensitivity acknowledgment or covenant mechanism is proposed to be registered against future industrial titles to protect the pre-existing lawful operation of the golf course and resort. Loss of Open Space and Rural / Urban Character 37. The proposal removes the last remaining open rural/pastoral land functioning as an informal landscape and amenity buffer between the existing industrial zone and Clearwater Resort. The 19ha site currently provides open pastoral character between the existing Industrial Heavy zone to the west and Clearwater Resort to the east. Its rezoning to Industrial General removes this land as an informal buffer, with the only remaining separation being the proposed 10–20m setback and landscaping strips. The submitter objects that the proposal removes the last remaining area of open rural character buffering Clearwater Resort from existing industrial land, without this cumulative loss of character being specifically assessed. 38. Approval of this Plan Change would close the remaining gap between the existing Harewood North industrial area and Clearwater Resort, creating a risk of setting a precedent for further industrial expansion toward Clearwater Avenue. If approved, the site would represent the full eastward extension of industrial zoning to the edge of Clearwater Resort, potentially establishing a precedent that could be relied upon by future applicants seeking further industrial rezoning closer to, or within, the Clearwater area. Submission on Proposed Private Plan Change 24 — Johns Road Page 9 of 10 Economic Case 39. The economic case is tested here in the spirit of Section 32, not simply opposed as a matter of principle. 40. The claimed absence of vacant freehold industrial land in 'Harewood North' has not been independently verified, and the applicant's own evidence suggests the adjoining 'Harewood South' Industrial Park undersupply may reflect a zoning/market mismatch rather than genuine citywide land shortage. If the underlying issue in Harewood South is that the Industrial Park zoning does not suit current market demand (as the applicant's own evidence at paragraph 125 suggests: 'this zone has not attracted any significant development during the last 10 years'), then the appropriate response may be to address zoning settings or land use within the existing urban area, rather than to extend the urban boundary through a new greenfield rezoning, consistent with the RPS's consolidation-first policy direction. The submitter raises a concern that the Plan Change's 'no alternative supply' narrative has not been independently verified, and that the underlying issue in the adjoining Industrial Park zoned land may reflect a zoning/market mismatch

rather than a genuine absence of developable industrial land in the locality. 41. The Greater Christchurch Spatial Plan is a strategic document which identifies appropriate locations for new and expanded industrial zones, which Councils are to give effect to through their planning documents. The Spatial Plan was implemented to satisfy the requirements under the NPS-UD, which provides national direction on how urban growth ought to occur. The Spatial Plan identifies that there is currently a significant surplus of industrial land in Greater Christchurch (645ha over 30 years) and identifies Selwyn District, particularly Rolleston, as the preferred location for future industrial growth. The applicant relies on the "responsive planning" provisions of the NPS-UD to circumvent this. For Greater Christchurch, the assessment identifies that there is likely to be sufficient industrial land for the next 30 years and beyond and therefore there is no need for additional industrial land to be rezoned, especially at this location. Relief Sought 42. For the reasons set out in this submission, the submitter's position is that the Plan Change should not be approved. 43. The submitter requests the opportunity to be heard in support of this submission, and to present further evidence, including independent expert evidence, in support of the matters raised. Submission on Proposed Private Plan Change 24 — Johns Road Page 10 of 10 Conclusion 44. The Plan Change would introduce a significant industrial rezoning immediately adjoining, and in parts within the same waterway catchment as, an operating golf course, a resort accommodation and hospitality operation, and an established residential community. The applicant's own Section 32 report contains a comprehensive assessment of many matters, but, on the material available to the submitter, does not specifically or adequately assess the effects of the proposal on the golf course, resort or residential community as receiving environments in their own right, particularly in relation to reverse sensitivity, noise, lighting and traffic at the Clearwater Avenue interface. Several of the mitigations the report otherwise relies upon, including wetland and riparian protection, stormwater treatment, erosion and sediment control, and intersection design, are deferred to later, separate consent processes rather than secured now. 45. The submitter(s) considers the applicant’s proposal lacks sufficient information, including an adequate s32 assessment, for a decision maker to be satisfied it holds the required information to determine the Plan Change pursuant to the RMA, including regarding the assessment of environmental effects. The applicant has failed to adequately assess the relevant objectives and policies under the Christchurch District Plan, and other higher order planning instruments, including the National Policy Statement of Urban Development 2020 (NPS-UD) and National Policy Statement for Highly Productive Land 2022.

Signed: Grant O’Neill_____

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

Stop fully and consult

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 26/08/2026

First name: Sam **Last name:** Jackson

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

I am a local resident and there are several concerns I have about the Johns Road industrial rezoning. My submission is about the potential effects of the proposed industrial development for the surrounding residential properties, noise, bore water systems, wildlife, Clearwater and the surrounding area.

The reasons for my / our submission are: (use additional pages if required)

I'm sure a big concern for people who already live and visit the area is we don't know what sort of businesses could end up there. If the proposed idea went ahead I feel there would need to be strict rules around noise. I don't think residents should have to deal with industrial noise that is louder or more disruptive than the normal background noise we already experience from the traffic and airport. Things like machinery, trucks and loud work being done, especially after usual business hours are things I am worried about.

It looks like this development will force residents within the planned site to sell and relocate when they may not want to. And having a large industrial area nearby could well and truly have a negative effect on local property prices.

Another concern is that there are houses around here that rely on bore water and I am worried about the risk of the industrial activity affecting the groundwater and our water supply overtime. I feel this needs to be seriously protected.

I am also worried about the wildlife and bird life. We get a lot of awesome animals around here that you don't see around Christchurch industrial areas. I feel this is something worth protecting and I would hate to see them disappear because of this development.

Clearwater is an iconic part of Christchurch and I would hate to see it become surrounded by industrial buildings and noise and lose the character it currently has for residents and tourists using the hotel, restaurant and golf course.

I would like to know that the residential properties that could and will be affected will be properly assessed to make sure they are

suitable for being next to heavy industrial businesses, especially the preschool. From my understand new houses built close to heavy industrial zones need to comply with specific acoustic and ventilation standards but the existing houses around here were not built with this type of development near them.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

I understand Christchurch needs land for businesses and industry, but I feel the residents, visitors, bore water systems, wildlife and Clearwater all need to be seriously protected, and I would like to know that these things have been properly considered before anything goes ahead.

For these reasons, I am currently against the Johns road industrial rezoning.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 23/08/2026

First name: Dylan **Last name:** Nicoll

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

My submission relates to the proposed rezoning of the land at 370–448 Johns Road from Rural Urban Fringe to Industrial General, including the proposed Outline Development Plan and associated area-specific rules. In particular, my submission relates to the potential effects of enabling industrial development on: * the loss of Rural Urban Fringe land and the existing rural character of the area; * traffic and heavy vehicle movements on Johns Road and surrounding roads; * waterways, wetlands, springs and the wider water environment, including the Hedges Waterway; * noise, dust, lighting and other effects associated with industrial development; and * the amenity and environmental values of the surrounding area.

The reasons for my / our submission are: (use additional pages if required)

It will be a blight on the area. We don't need another giant industrial area full of trucks, pollution, ruined waterways.

Its busy enough with traffic in the mornings just trying to use the "new" motorway that was supposed to "fix" the already overwhelming traffic problems we have. We don't want to turn into Auckland.

The water quality of the city is already compromised and ruined and this will only add to it. The New Motorway by itself

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The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

Not make another completely new environmental botch job for more years of development, when you haven't and won't even fix the infrastructure problems we already have that people have been begging for years.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 23/08/2026

First name: Juliana **Last name:** Guimaraes

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

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In particular, my submission relates to the potential effects of enabling industrial development on:

the loss of Rural Urban Fringe land and the existing rural character of the area;
traffic and heavy vehicle movements on Johns Road and surrounding roads;
waterways, wetlands, springs and the wider water environment, including the Hedges Waterway;
noise, dust, lighting and other effects associated with industrial development; and
the amenity and environmental values of the surrounding area.

The reasons for my / our submission are: (use additional pages if required)

I am concerned that this plan change will result in the permanent loss of Rural Urban Fringe land and further erosion of the rural character of this part of Christchurch. Once land is rezoned and developed for industrial purposes, the existing open and rural character cannot realistically be restored.

The proposed site is part of an area where rural, residential, recreational and environmental values exist alongside one another. Further industrial expansion risks changing the character of the area and creating cumulative effects beyond the boundaries of the proposed development.

I am also concerned about the additional traffic and heavy vehicle movements that industrial development is likely to generate. Johns Road is already a significant transport route, and further industrial activity has the potential to increase congestion, noise,

safety concerns and pressure on the surrounding road network.

A particular concern is the potential impact on local waterways, wetlands and springs. The Hedges Waterway borders the northern side of the proposed site, and the wider area contains important water and drainage environments. Industrial development, increased hard surfaces, earthworks and changes to drainage patterns could create risks to water quality, stormwater management and the ecological health of nearby waterways and wetlands.

I am concerned that the protection of waterways, wetlands and springs should be considered carefully before industrial development is enabled. These environmental features are valuable and vulnerable, and any potential effects should be avoided where possible rather than relying solely on mitigation after development occurs.

I am also concerned about the effects associated with industrial activity, including noise, lighting, dust and visual impacts. These effects may affect nearby residents, rural land, recreational areas and the general amenity of the surrounding environment. Industrial development can also create cumulative effects over time as additional businesses and activities establish in the area.

While the proposed land may be adjacent to existing industrial zoning, this does not remove the importance of protecting the remaining Rural Urban Fringe land and the surrounding environmental features. I do not consider that the potential loss of rural character and the risks to waterways, wetlands, springs and local amenity have been sufficiently outweighed by the benefits of extending industrial zoning into this area.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

I would like the Council to reject Private Plan Change 24 and retain the existing Rural Urban Fringe zoning of the land.

If the plan change is not rejected, I request that no rezoning or development proceed unless there is clear and robust evidence that adverse effects on waterways, wetlands, springs, groundwater and the Hedges Waterway can be avoided.

At a minimum, any further consideration of the proposal should include strong protections and enforceable requirements relating to:

protection and restoration of waterways, wetlands and springs;
stormwater and drainage management;
protection of water quality and ecological values;
maintaining appropriate buffers between industrial development and sensitive environmental areas;
managing additional traffic and heavy vehicle movements;
limiting noise, dust and light spill;
maintaining landscaping and screening to reduce visual impacts; and
protecting the remaining rural character and amenity of the surrounding area.

I ask that the long-term environmental and community effects of this proposal be given significant weight before any permanent loss of Rural Urban Fringe land is approved.

PC24 - Johns Road Industrial

Submitter Details

Submission Date: 23/08/2026

First name: Jude **Last name:** Shepperd

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

My submission relates to the proposed rezoning of the land at 370–448 Johns Road from Rural Urban Fringe to Industrial General, including the proposed Outline Development Plan and associated area-specific rules.

In particular, my submission relates to the potential effects of enabling industrial development on:

the loss of Rural Urban Fringe land and the existing rural character of the area;
traffic and heavy vehicle movements on Johns Road and surrounding roads;
waterways, wetlands, springs and the wider water environment, including the Hedges Waterway;
noise, dust, lighting and other effects associated with industrial development; and
the amenity and environmental values of the surrounding area

The reasons for my / our submission are: (use additional pages if required)

I am concerned that this plan change will result in the permanent loss of Rural Urban Fringe land and further erosion of the rural character of this part of Christchurch. Once land is rezoned and developed for industrial purposes, the existing open and rural character cannot realistically be restored.

The proposed site is part of an area where rural, residential, recreational and environmental values exist alongside one another. Further industrial expansion risks changing the character of the area and creating cumulative effects beyond the boundaries of the proposed development.

I am also concerned about the additional traffic and heavy vehicle movements that industrial development is likely to generate. Johns Road is already a significant transport route, and further industrial activity has the potential to increase congestion, noise,

safety concerns and pressure on the surrounding road network.

A particular concern is the potential impact on local waterways, wetlands and springs. The Hedges Waterway borders the northern side of the proposed site, and the wider area contains important water and drainage environments. Industrial development, increased hard surfaces, earthworks and changes to drainage patterns could create risks to water quality, stormwater management and the ecological health of nearby waterways and wetlands.

I am concerned that the protection of waterways, wetlands and springs should be considered carefully before industrial development is enabled. These environmental features are valuable and vulnerable, and any potential effects should be avoided where possible rather than relying solely on mitigation after development occurs.

I am also concerned about the effects associated with industrial activity, including noise, lighting, dust and visual impacts. These effects may affect nearby residents, rural land, recreational areas and the general amenity of the surrounding environment. Industrial development can also create cumulative effects over time as additional businesses and activities establish in the area.

While the proposed land may be adjacent to existing industrial zoning, this does not remove the importance of protecting the remaining Rural Urban Fringe land and the surrounding environmental features. I do not consider that the potential loss of rural character and the risks to waterways, wetlands, springs and local amenity have been sufficiently outweighed by the benefits of extending industrial zoning into this area.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

I would like the Council to reject Private Plan Change 24 and retain the existing Rural Urban Fringe zoning of the land.

If the plan change is not rejected, I request that no rezoning or development proceed unless there is clear and robust evidence that adverse effects on waterways, wetlands, springs, groundwater and the Hedges Waterway can be avoided.

At a minimum, any further consideration of the proposal should include strong protections and enforceable requirements relating to:

protection and restoration of waterways, wetlands and springs;
stormwater and drainage management;
protection of water quality and ecological values;
maintaining appropriate buffers between industrial development and sensitive environmental areas;
managing additional traffic and heavy vehicle movements;
limiting noise, dust and light spill;
maintaining landscaping and screening to reduce visual impacts; and
protecting the remaining rural character and amenity of the surrounding area.

I ask that the long-term environmental and community effects of this proposal be given significant weight before any permanent loss of Rural Urban Fringe land is approved.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 23/08/2026

First name: Lee-Anne **Last name:** Benton

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

My submission relates to the proposed rezoning of the land at 370–448 Johns Road from Rural Urban Fringe to Industrial General, including the proposed Outline Development Plan and associated area-specific rules.

In particular, my submission relates to the potential effects of enabling industrial development on:

the loss of Rural Urban Fringe land and the existing rural character of the area;
traffic and heavy vehicle movements on Johns Road and surrounding roads;
waterways, wetlands, springs and the wider water environment, including the Hedges Waterway;
noise, dust, lighting and other effects associated with industrial development; and
the amenity and environmental values of the surrounding area.

The reasons for my / our submission are: (use additional pages if required)

I am concerned that this plan change will result in the permanent loss of Rural Urban Fringe land and further erosion of the rural character of this part of Christchurch. Once land is rezoned and developed for industrial purposes, the existing open and rural character cannot realistically be restored.

The proposed site is part of an area where rural, residential, recreational and environmental values exist alongside one another. Further industrial expansion risks changing the character of the area and creating cumulative effects beyond the boundaries of the proposed development.

I am also concerned about the additional traffic and heavy vehicle movements that industrial development is likely to generate. Johns Road is already a significant transport route, and further industrial activity has the potential to increase congestion, noise,

safety concerns and pressure on the surrounding road network.

A particular concern is the potential impact on local waterways, wetlands and springs. The Hedges Waterway borders the northern side of the proposed site, and the wider area contains important water and drainage environments. Industrial development, increased hard surfaces, earthworks and changes to drainage patterns could create risks to water quality, stormwater management and the ecological health of nearby waterways and wetlands.

I am concerned that the protection of waterways, wetlands and springs should be considered carefully before industrial development is enabled. These environmental features are valuable and vulnerable, and any potential effects should be avoided where possible rather than relying solely on mitigation after development occurs.

I am also concerned about the effects associated with industrial activity, including noise, lighting, dust and visual impacts. These effects may affect nearby residents, rural land, recreational areas and the general amenity of the surrounding environment. Industrial development can also create cumulative effects over time as additional businesses and activities establish in the area.

While the proposed land may be adjacent to existing industrial zoning, this does not remove the importance of protecting the remaining Rural Urban Fringe land and the surrounding environmental features. I do not consider that the potential loss of rural character and the risks to waterways, wetlands, springs and local amenity have been sufficiently outweighed by the benefits of extending industrial zoning into this area.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

I would like the Council to reject Private Plan Change 24 and retain the existing Rural Urban Fringe zoning of the land.

If the plan change is not rejected, I request that no rezoning or development proceed unless there is clear and robust evidence that adverse effects on waterways, wetlands, springs, groundwater and the Hedges Waterway can be avoided.

At a minimum, any further consideration of the proposal should include strong protections and enforceable requirements relating to:

protection and restoration of waterways, wetlands and springs;
stormwater and drainage management;
protection of water quality and ecological values;
maintaining appropriate buffers between industrial development and sensitive environmental areas;
managing additional traffic and heavy vehicle movements;
limiting noise, dust and light spill;
maintaining landscaping and screening to reduce visual impacts; and
protecting the remaining rural character and amenity of the surrounding area.

I ask that the long-term environmental and community effects of this proposal be given significant weight before any permanent loss of Rural Urban Fringe land is approved.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 25/08/2026

First name: Diane **Last name:** Jones

On behalf of: Diane and John Jones

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Submission on the Proposed Rezoning of Land on Johns Road to Industrial.
We write to formally object to the proposed rezoning of land on Johns Road to an Industrial designation. The requested modification will significantly compromise the amenity value, environmental integrity, and overall quality of life within our residential neighbourhood.

The reasons for my / our submission are: (use additional pages if required)

Residential Amenity: The introduction of industrial activities will generate adverse effects (noise, dust, and visual pollution), failing to protect the well-established residential amenity required for residents to safely and peacefully age in place.

Industrial Sufficiency: As owners of an existing industrial facility in the Greywacke area, we assert that further industrial expansion into this specific locality is unwarranted and counterproductive to balanced urban planning.

Environmental Impact: The proposed development threatens localised rural land and critical waterways that currently support active populations of fish and eels.

Traffic and Congestion: The surrounding road network already experiences severe peak-hour congestion, particularly during the northward flow from the airport. Introducing heavy industrial traffic will compound existing network failures and create unsafe delays for residents exiting Clearwater Avenue.

Process Transparency: Affected residents were not directly notified or adequately consulted regarding these proposals. This lack of transparency falls short of the expectations for robust community engagement and public involvement required for significant district planning changes.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

We oppose the proposed industrial rezoning and request that the Council retain the existing zoning of the land.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 24/08/2026

First name: Ryan **Last name:** Brosnahan

Organisation: RMG Planning Limited

On behalf of:

Christchurch International Airport Limited

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Am neutral towards the plan change

See attached Form 5 submission.

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

See attached Form 5 submission.

The reasons for my / our submission are: (use additional pages if required)

See attached Form 5 submission.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

See attached Form 5 submission.

Attached Documents

Name
CIAL Submission PC24 - FINAL v3 24.8.26

SUBMISSION ON A PUBLICLY NOTIFIED PLAN CHANGE TO THE CHRISTCHURCH DISTRICT PLAN

Clause 6 of Schedule 1, Resource Management Act 1991 (RMA)

To Christchurch City Council

Name of submitter: Christchurch International Airport Limited (*CIAL*)

1. This is a submission on Private Plan Change 24 (PC24) – Johns Road Industrial.

2. CIAL could not gain an advantage in trade competition through this submission.

3. CIAL's submission relates to the whole application. The reasons for CIAL's relief sought are set out in **Appendix A**.

4. CIAL seeks the following decision from the consent authority:

    a. Amend PC24 so that Rule 6.7.4.3.1 P3 of the Christchurch District Plan, including its activity-specific standards for new stormwater basins and water bodies, applies throughout the PC24 ODP area;

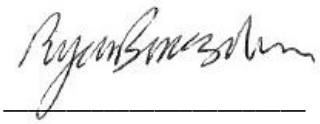
    b. Include this requirement in the PC24 ODP description, together with any consequential provisions necessary to give it effect; and

    c. Grant any consequential amendments or other similar relief that would address CIAL's concerns set out in this submission.

5. CIAL wishes to be heard in support of the submission.

6. If others make a similar submission, CIAL will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Christchurch International Airport Limited by RMG Planning Limited.



Ryan Brosnahan
Director | Senior Consultant
24 August 2026

Address for service of submitter:

Christchurch International Airport Limited
c/- Ryan Brosnahan
RMG Planning Limited
ryan@rmgplanning.co.nz
027 247 0240

APPENDIX A

Overview

1. CIAL welcomes the opportunity to submit on Private Plan Change 24 (PC24) – Johns Road Industrial.

2. CIAL's submission is targeted specifically at the potential for increased bird strike risk associated with stormwater management and the creation of stormwater basins or other water bodies within the PC24 area.

3. Christchurch International Airport is recognised in the existing planning framework as infrastructure of regional and national significance. Its importance extends beyond Canterbury, given its role in domestic and international passenger and freight movements and in connecting South Island businesses and communities with the rest of New Zealand and the world.

4. Christchurch International Airport is the largest airport in the South Island and the second largest in New Zealand. It operates 24 hours a day, seven days a week. This unrestricted operating capability is an important feature of the Airport and contributes to its ability to support passenger travel, freight movements and wider regional and national economic activity.

5. The continued safe and efficient operation of the Airport therefore has significant social and economic benefits. Land use and development within the wider airport environment needs to be managed so that it does not unnecessarily compromise those functions.

6. CIAL does not oppose the proposed Industrial General rezoning in principle. However, CIAL considers that PC24 should include a clear and proportionate mechanism to ensure that future stormwater infrastructure and water bodies are designed and managed so that they do not unnecessarily increase bird strike risk to aircraft using Christchurch International Airport.

Canterbury Regional Policy Statement

7. The Canterbury Regional Policy Statement (CRPS) identifies Christchurch International Airport as both regionally significant infrastructure strategic infrastructure. The CRPS definition of strategic infrastructure includes infrastructure that is greater than local importance and may include nationally significant infrastructure.

8. Chapters 5 and 6 of the CRPS establish a policy framework that recognises the importance of strategic infrastructure and seeks to ensure that new land use and development is appropriately integrated with that infrastructure.

9. In particular, Objective 5.2.1 seeks development that is located and designed so that it:

    9.1. is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure; and

    9.2. avoids adverse effects on significant natural and physical resources, including regionally significant infrastructure, or where avoidance is impracticable, remedies or mitigates those effects.

10. Objective 6.2.1 similarly seeks a land use and infrastructure framework for Greater Christchurch that achieves development which does not adversely affect the efficient operation, use, development, appropriate upgrading and future planning of strategic infrastructure and freight hubs, while optimising the use of existing infrastructure.

11. Policy 6.3.5 reinforces this direction by requiring the effects of land use activities on infrastructure to be managed, including by avoiding activities that have the potential to limit the efficient and effective provision, operation, maintenance or upgrading of strategic infrastructure and freight hubs.

12. The explanation to Policy 6.3.5 recognises that strategic infrastructure represents an important regional, and sometimes national, asset that should not be compromised by urban growth and development.

13. Taken together, the CRPS framework:

    13.1. recognises the significant social and economic importance of Christchurch International Airport;

    13.2. requires land use and infrastructure planning to be appropriately integrated;

    13.3. seeks to avoid or manage activities that could compromise strategic infrastructure; and

    13.4. supports the continued safe, efficient and effective operation and development of the Airport.

14. This policy direction is relevant to PC24. While the proposed Industrial General zoning is not inherently incompatible with Airport operations, the stormwater infrastructure anticipated by the ODP has the potential to influence bird strike risk if not appropriately designed and managed.

Bird Strike Risk

15. A bird strike is a collision between an aircraft and one or more birds, most commonly during take-off or landing when aircraft are operating at lower altitudes. Although many strikes cause limited or no damage, strikes involving larger birds or flocks can damage engines, windscreens or other aircraft components and, in severe cases, can result in serious injury or fatalities.

16. Bird strike risk is a key threat to the safe and efficient operation of Christchurch International Airport. The consequences of a single strike can be significant, including risks to aircraft safety, operational disruption and damage.

17. The risk of bird strike is recognised both within the CRPS and the Christchurch District Plan (CDP) planning frameworks. Similarly, CIAL actively manages bird strike risk both on and off the airport. Off-airport water bodies, wetlands, stormwater facilities and associated landscaping can influence bird behaviour, abundance and movement, particularly where they provide feeding, roosting, nesting or loafing habitat for species that may pose a risk to aircraft operations.

18. Stormwater basins and water bodies are therefore relevant to bird strike risk because their design and operation can affect their attractiveness to birds. Matters such as the duration and extent of ponding, drawdown time, basin geometry, planting and the availability of roosting or perching opportunities can all influence bird use.

19. Given the PC24 area's proximity to Christchurch International Airport, CIAL considers it appropriate that potential bird strike risk is addressed through the plan change.

PC24 Stormwater Management

20. The PC24 ODP identifies a dedicated stormwater management area adjacent to Hedges Waterway and the natural inland wetland. The ODP records the size and location of the stormwater management area as "TBC".

21. The detailed design, size and configuration of the future stormwater facilities are not fixed through the ODP. Accordingly, PC24 provides an appropriate opportunity to establish the design parameters that will apply when those facilities are subsequently developed.

22. CIAL seeks to ensure that bird strike risk is considered from the outset and that the future stormwater system does not create or materially increase bird-attracting habitat.

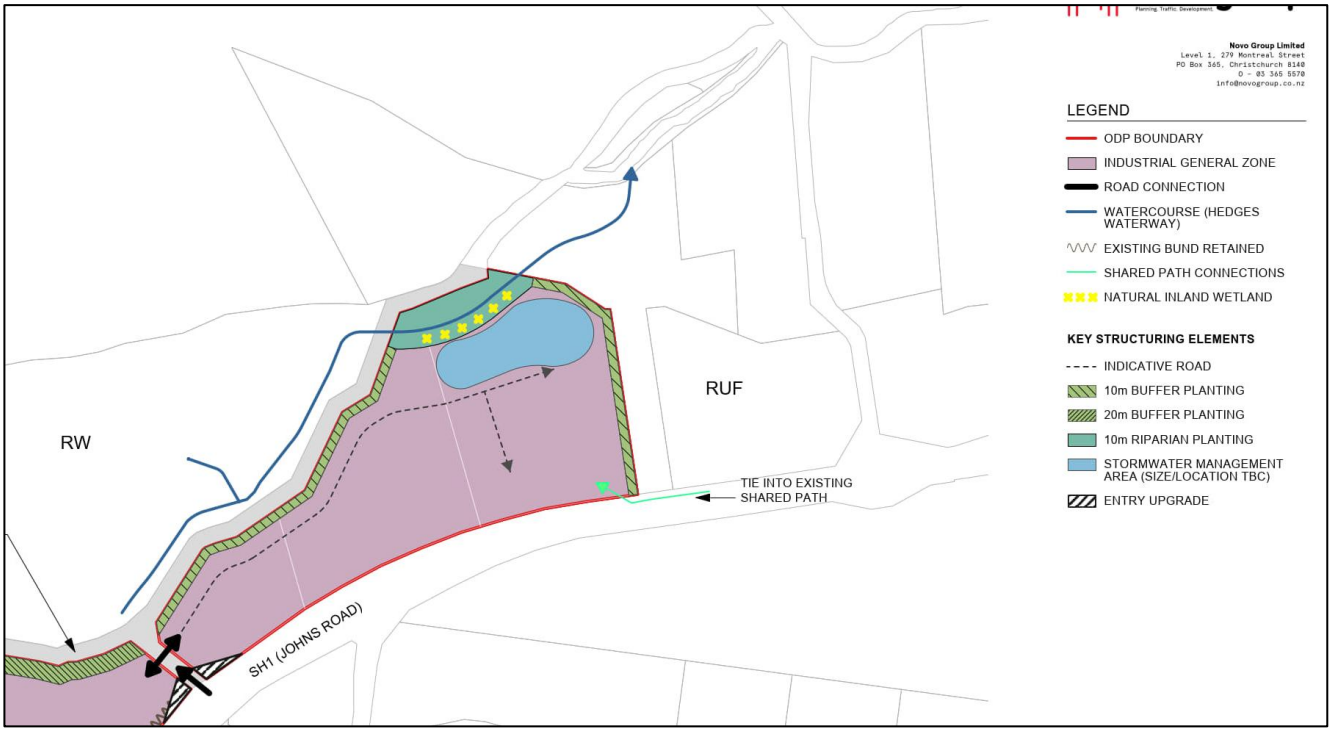


Figure 1: *Extract from the PC24 Outline Development Plan showing the proposed stormwater management area, Hedges Waterway and natural inland wetland.*

Existing Christchurch District Plan Framework

23. As stated above, the Christchurch District Plan already recognises the relationship between stormwater infrastructure, water bodies and bird strike risk through the Aircraft Protection provisions in Chapter 6.

24. Rule 6.7.4.3.1 P3 specifically manages the creation of new stormwater basins and new water bodies exceeding 500m² within the Birdstrike Management Area. The rule establishes an existing set of design standards directed at reducing the attractiveness of those features to birds.

25. Those standards require, among other things:

    25.1. the combined area of stormwater basins and/or water bodies within 0.5km of the proposed basin or water body to not exceed 1,000m²;

25.2. stormwater infiltration basins to fully drain within 48 hours of the cessation of a 2% AEP storm event;

25.3. sufficient rapid soakage overflow capacity to minimise ponding outside infiltration areas;

25.4. plant species to be limited to those listed in Appendix 6.11.9;

25.5. water bodies to incorporate the side-slope requirements specified in Rule 6.7.4.3.1 P3; and

25.6. no permanent island features that could provide perching sites for birds.

26. Where the P3 standards are not met, Rule 6.7.4.3.3 RD2 provides a restricted discretionary consent pathway so that the scale and significance of bird strike risk, and mitigation through design, operation or management, can be considered.

27. The existing framework is, however, spatially limited to the Birdstrike Management Area, being within 3 km of the runway thresholds at Christchurch International Airport. The PC24 area is approximately 3–4 km from the runway threshold and therefore lies at or immediately beyond the extent of that existing management area. CIAL considers the current 3 km spatial extent does not reflect the full area within which bird strike risk may be relevant.

Application of Existing Rule to PC24

28. CIAL considers the simplest response is to incorporate the requirements of Rule 6.7.4.3.1 P3 into the PC24 ODP description so that those standards apply to any new stormwater basin or water body throughout the ODP area. This would not require amendment of the existing Birdstrike Management Area or Rule 6.7.4.3.1 P3 itself.

29. This approach would not require a bespoke bird strike framework for PC24. It would use an existing and understood set of District Plan standards and make it clear to future developers that those standards are to be met when stormwater facilities or water bodies are designed within the PC24 area.

30. CIAL considers this requirement should be expressly recorded in the PC24 ODP description. Any consequential area-specific provision needed to give legal effect to the ODP requirement, including an appropriate consent pathway where the standards are not met, can be included as part of PC24.

Relief Sought and Reason for the Relief

31. CIAL seeks that PC24 be amended as follows:

31.1. Amend the PC24 ODP description so that any new stormwater basin or water body within the ODP area is required to meet the activity-specific standards in Rule 6.7.4.3.1 P3, irrespective of whether the facility is within the mapped Birdstrike Management Area.

31.2. CIAL suggests wording to the following or similar effect:

Bird Strike Risk – Stormwater

Stormwater management facilities and water bodies within the ODP area shall be designed and managed to minimise the attraction of bird species that may pose a bird strike risk to aircraft using Christchurch International Airport. For the purposes of the ODP area, Rule 6.7.4.3.1 P3, including its activity-specific standards for the creation of new stormwater basins and water bodies, shall apply

notwithstanding that the ODP area is outside the Birdstrike Management Area shown in Appendix 6.11.7.5.

31.3. Include any consequential area-specific rule or matter of discretion necessary to give effect to the ODP requirement, including an appropriate consent pathway where the Rule 6.7.4.3.1 P3 standards are not met so that bird strike risk and appropriate mitigation can be assessed.

31.4. Make any consequential amendments necessary to give effect to the above relief.

32. CIAL is open to alternative drafting that achieves the same outcome. This relief provides a simple and proportionate means of managing bird strike risk while enabling the stormwater infrastructure required to service PC24. It also assists PC24 to give effect to the CRPS direction to protect the continued safe, efficient and effective operation of regionally significant and strategic infrastructure.

Conclusion

33. Christchurch International Airport is nationally significant infrastructure, and the PC24 area is located approximately 3–4 km from the Runway 20 threshold. The CRPS requires development to be compatible with, and protect the continued safe, efficient and effective operation of regionally significant and strategic infrastructure

34. CIAL does not oppose the Industrial General rezoning proposed by PC24 in principle. Its concern is limited to ensuring that future stormwater basins and water bodies are designed and managed so that they do not unnecessarily increase bird strike risk to aircraft using Christchurch International Airport.

35. The Christchurch District Plan already contains established standards for managing this issue within the existing Birdstrike Management Area. CIAL considers that applying the requirements of Rule 6.7.4.3.1 P3 through the PC24 ODP description provides a simple and proportionate response and assists PC24 to give effect to the relevant higher-order direction. CIAL accordingly seeks that PC24 be amended as set out above, together with any consequential or similar relief necessary to give effect to the outcomes sought in this submission.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 24/08/2026

First name: Jackie and Simon **Last name:** Jackson

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

We oppose PPC24 and request that it be declined in full.

After reading all the information supplied, we do not see any significant benefit for this development to go ahead. There is nothing of significance to support the local community. It appears detrimental to: traffic levels - this is on the main thoroughfare of people commuting north and south on state highway 1 on an already at-times congested road; the rural landscape will be forever changed; risk to waterways - not just ecology but human health; noise and dust could be very aggravating and disturb people's right to quiet enjoyment; there are other industrial areas recently developed around Ryans Road area to allow for industry; the land is currently on residential property and is close to other residential property; there are local waterways such as The Groynes, nearby wetland reserves as well as bordering a creek and spring fed waterways; Willowbank, a landmark that brings tourists and money to our city and undertakes its own conservation work; a crematorium and cemetery; a preschool; the list is endless for the reasons against supporting this proposal.

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Appendix E - Freshwater/Aquatic Ecology Assessment

Appendix K - PDP Prelim Groundwater Investigations

RFI Response Letters - December 2025, May and July 2026

PC 14 Rezoning Request - Independent Hearings Panel Recommendations - 17 May 2024, pages 14 and 15 - prior rezone submission of 370, 390 and 432 Johns Road - rejected

City Services Committee Meeting Minutes - 14 August 1997 - Point 3. Water supply to Johns Road - discussion

The reasons for my / our submission are: (use additional pages if required)

We wish to provide information of an historical Johns Road timber-treatment operation. CCC records state in a 14 August 1997 meeting that timber-treatment chemicals contaminated the Johns Road area. The Council attributed the contamination to a stormwater discharge from a nearby timber-treatment site before 1995. Remedial work was managed by the Canterbury Regional Council. The contamination was detected in groundwater. The well used for truck washing at the timber-treatment site had arsenic above the 1995 drinking-water Maximum Acceptable Value (MAV), and a well on a neighbouring property exceeded the MAV for both arsenic and chromium. Three other properties and another well had arsenic or chromium at the MAV. The neighbouring contaminated well was subsequently no longer used for domestic water supply. The report concludes that the detection of contaminants of health significance in private water supplies meant that alternatives to those wells had to be considered.

This report demonstrates that industrial activity in this immediate Johns Road area has historically contaminated groundwater and affected a neighbouring private water supply.

From reading provided reports, it is ascertained that the proposed land rezoning pertains an aquatic environment, Hedges Waterway, Otukaikino Creek and the ecological assessments identify the waterways as having aquatic habitat values, along with spring-fed waterways in the wider system, therefore making water quality and groundwater/surface-water interaction a very important matter.

Being a neighbouring property owner, water contamination is a serious concern for us. There are an extensive number of reports that have been issued, with an indication that there are additional sampling requirements still to be undertaken at 432 Johns Road. If stormwater infiltration is subsequently concentrated in or near that area, the question becomes whether the groundwater pathway has been adequately assessed. Why is testing done across the sites and results are provided for 370 and 390 Johns Road but the same not provided for 432 Johns Road?

Notably the investigation has also been limited by access to parts of 448 Johns Road. The overall conclusion about the entire 19-hectare area is not certain, as 448 Johns Road is a 7.2 ha property - 37% of the proposed area not fully investigated. Has the applicant demonstrated enough about the groundwater, contamination and stormwater pathways to establish that those controls will actually protect the aquatic ecological values identified in the report by PDP?

In the applicant's response to Christchurch City Council's Request for Further Information, JRCD/Novo states that the landowner of 448 Johns Road is not a part of the request and that consultation undertaken with this landowner has been limited to the fact that this owner is not interested in rezoning their land, yet the land is included in the plan-change area. At the same time, we wish to reiterate that the applicant has been unable to undertake the same level of technical investigation on that property.

On the surface, when examining the Outline Development Plan, by including 448 Johns Road in the zone change essentially helps create a consolidated and connected form to the existing industrial area. 448 Johns Road borders Hedges Waterway, and the PPC24 proposal involves an integrated stormwater/industrial-development concept. What happens to the stormwater strategy if the 448 Johns Road owner never develops their land? It raises the question of why the property is part of the rezone against the expressed wishes of the owner? Why should the technical assessment of the whole PPC24 area be considered sufficient when the application couldn't fully investigate 448 Johns Road? If the 448 Johns Road owner continues as is, does the outline development plan still work as intended? What can be done with the stormwater infrastructure without 448 Johns Road owner's agreement? What are 448 Johns Road owner's comments on the proposed stormwater, access and ecological measures affecting their land?

The 2013 NZTA investigation of 448 Johns Road sampled only to approximately 1 metre depth and reported no significant contamination at the locations investigated. Given that the current PPC24 investigation was unable to access 448 Johns Road, please explain why the 2013 investigation is considered sufficient to establish the current contamination status of the property for the proposed Industrial General zoning and proposed stormwater infiltration system.

Please provide the complete 2013 investigation, including sample locations, sample depths, contaminants tested, laboratory results and detection limits, and identify which areas of 448 Johns Road were not sampled.

Was groundwater tested at 448 Johns Road in 2013 or subsequently? If not, what evidence establishes that contamination below 1 metre, or contaminants mobilised through groundwater, cannot affect Hedges Waterway or downstream aquatic ecological values?

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

448 Johns Road has a previous contamination investigation, but it was limited in depth and purpose; the current PPC24 investigation could not access the property; and therefore there is an information gap regarding its present soil and groundwater condition under the proposed industrial/stormwater regime.

Another pertinent factor, following on from above, is that Council's RFI records that PDP originally recommended groundwater monitoring bores to establish: ground water levels, ground water movement, and the relationship between ground water and surface water. Those investigations don't appear to have been completed, otherwise the findings have not been submitted. This information needs investigating and completing before subdivision and regional consent is issued. As Council states, the pertaining factors are: groundwater is relatively shallow, the aquifer is unconfined, there is no infiltration testing, no geotechnical information for 448 Johns Road and the contamination/geotechnical information elsewhere is preliminary. The proposed land rezoning borders spring-fed waterways, including Otukaikino Creek, the Groynes and the Waimakairi River, local residential private properties that source bore water and, not forgetting Willowbank, our national iconic native wildlife reserve that has breeding programmes for our protected native kiwi and takahe birds.

This ground water monitoring, before rezoning is considered, needs to consist of: multiple monitoring wells, seasonal monitoring, ground water levels, ground water flow direction, hydraulic gradients, ground water/surface water interaction, and base-line water quality samples. Only once these investigations have been completed and satisfactory results obtained, can a rezone proposal be considered. There is no control afterwards to ensure a developer will adhere to undertaking these investigations, and any certainty that the results will be satisfactory. As outlined above, there has been historical water contamination in this area from industrial operations taking place - it does happen!

We are concerned that 448 Johns Road has been included within PPC24 despite the landowner not supporting or participating in the proposed rezoning. I understand from the applicant's request for Further Information Response that consultation with the landowner established that they are not interested in rezoning their land. We are also concerned that the current technical investigations do not provide the same level of geotechnical, contamination and groundwater information for 448 Johns Road. Council should therefore carefully consider whether it is appropriate to rezone this separately owned property as part of an integrated industrial development proposal, particularly where the property's relationship with Hedges Waterway and the proposed stormwater system is relevant.

Noteworthy is the fact that a zone request for 370, 390 and 432 Johns Road has been previously submitted to Council, and the request was **rejected**. One can't help but surmise that because 448 Johns Road has now been incorporated into this land parcel that the proposers are doing this as a means to strengthen their application, albeit without 448 John Road's landowners' consent or support.

We thank you for your time in listening to our concerns. The water contamination is only one factor for consideration, notwithstanding all the other environmental factors that we haven't even touched on and need to be individually assessed and investigated also.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 25/08/2026

First name: Sarah **Last name:** Cameron

On behalf of: Sarah & John Cameron

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

Details within attached letter of submission

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Details within attached letter of submission

The reasons for my / our submission are: (use additional pages if required)

Details within attached letter of submission

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

Deny Proposed Plan change

Attached Documents

Name
Clearwater - Submission

In Respect of Proposed Private Plan Change 24 – Johns Road
370 – 448 Johns Road, Russley, Christchurch (JRCD Limited)

24th August 2026

TO :-
The Chief Executive
Christchurch City Council
PO Box 73015
Christchurch 8154

FROM:-
John & Sarah Cameron
92 Harts Creek Lane
Clearwater Resort
Christchurch

RE:-
Proposed Change to the Christchurch District Plan requested by the Applicant JRCD Limited under clause 21 of Schedule 1 to the Resource Management Act 1991 – Rezoning oof 370 / 390 / 432 / 448 Johns Road from Rural Urban Fringe to Industrial General.

As Residents and Owners of a Home within the Clearwater Resort we (the Submitters) object to this plan change proposal by the Applicant (JRCD Ltd) in its entirety.
The Applicants land is in extremely close proximity to Clearwater Resort which is made up of Residential Homes / Hotel / Golf Course. All of these would be highly negatively impacted by this proposed Industrial Rezoning for numerous reasons :-

*TRAFFIC – It is clear that there are already traffic congestion issues along Johns Road particularily around the Sawyers Arms Roundabout area and stretching North and South of that . Driving out of Clearwater Avenue and entering Johns Road at present can often be a mission due to the amount of constant heavy traffic at that point so it is unimaginable to think what it would be like with a large Industrial Area adding greatly to this in such close proximity

*NOISE – The construction works on a site of this size (about 19 hectares) will be very noisy over a long period of time. This would particularily affect the Clearwater Golf Club & Sir Bob Charles Training Facility and the Peppers Clearwater Hotel as well as the ordinary residents of Clearwater.

DUST – There would be large amounts of dust / airborne dirt produced during the construction phase of the proposed site . This will affect all nearby properties and will have particular negative effects on the Golf Course and those who utilize it.

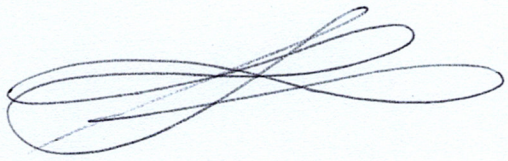
VISUAL EFFECT – An Industrial Area would be visible from parts of Clearwater Resort which is totally inappropriate given the current open rural character of the landscape. Lighting pollution caused by this proposal would also have a huge negative effect at Clearwater.

ECOLOGY – There is no doubt that the proposed plan change to Industrialize the site in question will degrade the ecology of the area. The already fragile waterways and the threatened native fish species within will be greatly threatened firstly by the construction / development of the site and then by the ongoing operation of a large Industrial area. Sediment , stormwater discharge and contaminants will affect and ruin the adjoining waterways and wetlands.

In Conclusion we reconfirm our Total Objection to the Proposed Plan Change in question due to all the negative effects it would cause for so many affected parties.

Regards





John Cameron

Sarah Cameron

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Ross **Last name:** Clarke

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Support all or part of the plan change

Fully support

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Overall approval

The reasons for my / our submission are: (use additional pages if required)

I support PC24 as there is clearly a lack of industrial land in the right areas of Canterbury, with vacant land that can be sold (not land locked by the likes of Calder Stewart) less than 2% and vacancy rates in 2024 at less than 1%. Since the 2011 earthquake the push for industrial land has been to the benefit of neighbouring Selwyn and Waimakariri districts, the risk being that with migration to the outer areas of Canterbury comes at an economic loss to Christchurch City. This area is prime for industrial land as it has no residential value due to being within the CIAL noise contour operative under 50dBA, it has no rural alue as hard boney land with the risk of livestock escaping onto SH1, leaving industrial land as its reasonable purpose along with adjoining existing industrial land which makes sense for continuation. The arterial routes north and south and within the 'Airport campus' would allow a industrial tenant greater access to vehicle movements through immediate state highway 1 access rather than the current Christchurch City eastern industrial blocks that can restrict city traffic flow due to their city locations for the access to arterial routes north and south. This would be reasoning to why both Selwyn and Waimakariri have been so successful with their industrial land growth strategies and now running the risk for Christchurch City of losing key tenants forever. The reduction of traffic through the city would reduce heavy vehicle carbon emissions and logistic productivity would improve. If you were to assume 45 truck movements a day that are currently operating from existing Christchurch East industrial areas, would create an annual distance saving of 280,000km per annum (including east suburb return trips), with each truck producing 330g of carbon per km or commonly measured as 33ltrs per 100km this equates to 92000kg or 92 ton of carbon (when converted to CO2 equates to 172,000cbm), all this from a basic relocation of industrial land for a greater environmental cost saving. This PC24 makes complete sense to happen not just for helping save Christchurch City and its industrial exodus but also for to help improve the city transport movement along with environmental benefits.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

27

I would like to see council approve PC24 as it has been submitted for the betterment of Christchurch City.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 26/08/2026

First name: William **Last name:** Whalan

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

The entire proposed plan change

The reasons for my / our submission are: (use additional pages if required)

I am very concerned about the potential for pollution of the Otukaikino Stream and it's tributaries. The adjoining Clearwater Resort was named due to being located in a unique catchment of pristine waters. I am further concerned about traffic impacts. The site fronts to SH1 and has an 80kph speed limit. Industrial zoning would mean a significant increase in traffic especially heavy traffic. It will be very problematic for heavy traffic to enter the SH and get up to speed to merge only to immediately slow for the Clearwater round about. The Clearwater round about is busy anyway without additional traffic. So too is the Sawyers Arms Road round about which has km long traffic jams every weekday morning and night. The surrounding area is made up of lifestyle blocks, tourist lodges and Clearwater resort. The noise, air quality and dust associated with heavy industrial is not appropriate in this location. Noise could be a major issue

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The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Lindsay **Last name:** O'Donnell

Organisation: Harewood Holdings (2016) Limited

On behalf of: Harewood Holdings (2016) Limited

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Support all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Whole of PPC24.

The reasons for my / our submission are: (use additional pages if required)

Please refer to attached document.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

1. Approve PPC24;
2. Rezone the subject land from Rural Urban Fringe Zone to Industrial General Zone;
3. Adopt the proposed Outline Development Plan and associated provisions, subject to any amendments needed to improve their workability while retaining the purpose and outcomes of PPC24; and
4. Make all necessary consequential amendments; and grant any other similar relief that gives effect to the matters raised in this submission.

Attached Documents

Name
PPC24_Johns_Road_Industrial_Submission_Harewood Holidings (2016) Ltd Submission

FORM 5

Submission on Private Plan Change 24 (Johns Road Industrial)

Submission on a publicly notified proposal for a plan change

Clause 6 of Schedule 1, Resource Management Act 1991

To	Christchurch City Council
Name of submitter	Harewood Holdings (2016) Limited (HHL)
Proposal	Private Plan Change 24 (PPC24) to the Christchurch District Plan

Submission

- This is a submission on PPC24, which seeks to rezone approximately 19 hectares of land at 370-448 Johns Road from Rural Urban Fringe Zone to Industrial General Zone, together with associated provisions and an Outline Development Plan.
- HHL could not gain an advantage in trade competition through this submission.
- HHL's submission relates to PPC24 in its entirety. HHL supports PPC24, subject to any amendments required to improve the workability of its provisions while maintaining the purpose and outcomes of the plan change.

Reasons for support

1. Strong evidence of demand for industrial land

The industrial land market evidence accompanying PPC24 identifies a limited and diminishing supply of vacant industrial land across Greater Christchurch and sustained rates of industrial land take-up. This reflects our own understanding of the Christchurch industrial land market.

The March 2025 Colliers update records that, since the March 2024 survey, three sites and part of another site in Harewood North had been developed or were in the process of development. It identified only three vacant sites remaining in Harewood North, comprising approximately 4.9 hectares, all of which were leasehold. This is consistent with our view that industrial land in this location continues to be highly demanded and of limited supply.

PPC24 would add much needed freehold industrial capacity in a location where the evidence identifies very limited existing freehold supply. This would improve choice and competition within the industrial land market and assist businesses requiring ownership rather than leasehold tenure.

2. Consistency with Council's 2021 Industrial Land Feasibility Assessment

Council's last detailed Industrial Land Feasibility Assessment (2018)[1] identified adjoining land in the wider Harewood locality as performing strongly in terms of industrial feasibility. In particular, the assessment recognised the area's accessibility to the strategic transport network and proximity to Christchurch International Airport, which are important drivers of industrial location and feasibility.

[1] Report-5-appendix-12-Feasibility-Assessments-Optimized.pdf page 13.

The PPC24 site shares those locational advantages. It fronts Johns Road, is close to the airport and adjoins an established industrial area. The proposed rezoning would therefore extend industrial zoning into land with the same strategic attributes that supported the favourable assessment of adjoining industrial land.

3. Strategic suitability of the site for industrial activity

The site is immediately adjacent to established industrially zoned land and would form a coherent extension of the Harewood industrial area.

The site has direct frontage to Johns Road and convenient access to the strategic transport network and Christchurch International Airport. These attributes support freight, logistics, warehousing, airport-related and general industrial activities and enable businesses to locate close to important transport infrastructure.

4. Limited availability and relative suitability of alternatives

The PPC24 market evidence identifies limited existing supply of freehold vacant industrial land in the vicinity of the airport that is realistically suitable for Industrial General or Industrial Heavy zoning.

Other industrial areas in northern and north-western Christchurch do not provide an equivalent substitute in every respect. Constraints include poorer ground conditions in some locations (North Belfast), interfaces with sensitive residential activities (North Belfast), different zone purposes and controls (Wairakei Road), and the prevalence of leasehold rather than freehold land (Airport zone).

The 2025 Colliers update also distinguishes the PPC24 site from the separate industrial proposal at 104 Ryans Road and records that there were no other alternative options subject to a Council-initiated or adopted notified plan change at the date of that report. PPC24 would therefore add a distinct and complementary industrial land opportunity.

5. The land is comparatively constrained for other urban uses

Although located at the urban edge, the site is less suitable for other principal urban uses:

- Residential development is constrained by the airport noise contour limitation, and the site is disconnected from nearby residential neighbourhoods and amenities by Johns Road.
- Significant commercial development would be inconsistent with the centres-based framework, which directs commercial growth toward established centres and locations supported by public transport and surrounding residential catchments.

Industrial use is more compatible with the adjoining land-use pattern and the site's strategic transport and airport context. It is our view that land that is otherwise well-located for urban purposes, should be enabled for its highest and best use, in this case industrial.

6. Contribution to a well-functioning urban environment

PPC24 would increase industrial development capacity, support employment and business activity, and provide much needed additional location and tenure choice for industrial occupiers.

The proposal responds to demonstrated demand and directs industrial development to a strategically located site adjoining an established industrial area. It is logical location for urban expansion, contiguous with the existing urban area. Its location away from sensitive receptors means it will not give rise to new industrial interface issues that the Council is currently looking to ameliorate through its proposed Plan Change 20. In our view, areas like this (and others) that can well-manage land use incompatibility with sensitive activities like housing, are inherently well-functioning and highly demanded by industrial businesses.

For these reasons, HHL considers PPC24 to be an efficient and appropriate use of the land and consistent with the sustainable management purpose of the Resource Management Act 1991.

Decision sought

HHL seeks that Christchurch City Council:

1. approve PPC24;
2. rezone the subject land from Rural Urban Fringe Zone to Industrial General Zone;
3. adopt the proposed Outline Development Plan and associated provisions, subject to any amendments needed to improve their workability while retaining the purpose and outcomes of PPC24;
4. make all necessary consequential amendments; and
5. grant any other similar relief that gives effect to the matters raised in this submission.

Hearing

- Harewood Holdings (2016) Limited wishes to be heard in support of this submission.
- If others make a similar submission, Harewood Holdings (2016) Limited will consider presenting a joint case with them at a hearing.

Signature and address for service

Signed	Lindsay O'Donnell
Date	27 August 2026
Submitter	Harewood Holdings (2016) Limited
Address for service	c/- Lindsay O'Donnell Harewood Holdings (2016) Limited PO Box 127 Christchurch 8140
Email	lindsay@amherst.co.nz
Phone	(03) 377 4958

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 27/08/2026

First name: Richard **Last name:** Holden

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

I oppose PC24 in its entirety. Please see supporting document for details.

The reasons for my / our submission are: (use additional pages if required)

The existing environment surrounding the land subject to PC24 contains sensitive activities including outdoor recreational activities (golf) and residential activities. The proposed change of land use will introduce activities that are incompatible with these, and will result in adverse effects on ecological values (including sensitive waterways), traffic/transport, servicing, and amenity.

Please see supporting document for details.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

For the reasons set out in the supporting document, I seek relief that PC24 be declined in its entirety.

Name
SUBMISSION AND OBJECTION IN RESPECT OF PROPOSED PRIVATE PLAN CHANGE 24 - Richard Holden

SUBMISSION AND OBJECTION IN RESPECT OF PROPOSED PRIVATE PLAN CHANGE 24 – JOHNS ROAD

370-448 Johns Road, Russley, Christchurch (JRCD Limited)

To:
The Chief Executive
Christchurch City Council
PO Box 73015
Christchurch 8154

From:
Richard Holden, resident and member of Clearwater Golf Club
4 Waterview Court
Northwood
Christchurch 8051

Re:
Proposed change to the Christchurch District Plan requested by JRCD Limited ("applicant") under Clause 21 of Schedule 1 to the Resource Management Act 1991 – rezoning of 370, 390, 432 and 448 Johns Road from Rural Urban Fringe to Industrial General, together with an associated Outline Development Plan and area specific rules ("the Plan Change").

Executive summary:

1. I object to Plan Change 24 - Johns Road ("PC24") in its entirety, and to each of its constituent provisions, for the reasons set out below.

2. I am a retired financial advisor and reside at 4 Waterview Court, Northwood which is located within the Clearwater Resort. I am an active member of the Clearwater Golf Club, along with 600 other members.

3. I support the submission prepared by Mr Michael Sharp on behalf of the Clearwater Golf Club Members.

4. I am not a trade competitor to the applicant of this Plan Change.

5. The location of Clearwater Resort in relation to the applicant's land is highlighted in the image below:



6. I consider that the proposal to rezone land from "Rural Fringe" to "Industrial General" will enable activities to establish that are incompatible with surrounding land uses, including residential, outdoor recreational, resort and golf course activities. Likely adverse effects include (but not limited to) those on landscape and amenity values, noise and other emissions, increased traffic , and ecological values.

7. I reserve the right to join other submitters to present a joint case with them at a hearing.

Summary of Concerns:

8. I support the submission of Mr Michael Sharp on behalf of the Clearwater Golf Course members. In addition to the concerns raised within Mr Sharp's submission, my specific concerns can be summarised as follows:

    a. **Effects on ecological values** including groundwater and on the adjacent waterways and wetlands which are already below water quality targets: the PC24 land area adjoins the Ōtūkaikino Stream, an ecologically significant tributary which is a habitat for threatened native fish species (Canterbury galaxias). The waterways and wetlands surrounding PC24 land are already degraded and water quality is poor. I am concerned industrial development in this location will further degrade an already compromised environment.

    b. **Servicing**: the application contains an inadequate level of information to determine whether appropriate levels of servicing (including stormwater and wastewater) are feasible for future land uses. Specifically, in relation to on-site stormwater disposal, I agree with Mr Sharp's submission prepared on behalf of the Clearwater Golf Club members that there is inadequate evidence presented that stormwater management will be wholly contained within the subject land area, and

not adversely affect adjoining land (i.e. Clearwater Golf Course/Resort), waterways or groundwater.

c. **Transport**: Increased traffic along State Highway and other feeder roads resulting from the proposed rezoning is a concern to me. Specifically the applicant's modelled increased delays at the Clearwater/Johns Road (State Highway 1) intersection which are potentially significant.

d. **Effects on amenity values**, including from noise, light spill, and adverse landscape and visual effects, dust and odour: The Resource Management Act 1991 defines "amenity values" as meaning "*those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes*". I support the submission prepared by Mr Sharp on behalf of the Clearwater Golf Club and its members in this regard, including the uncertainty of noise and light spill generated by future general industrial type land uses and the impacts on an established, outdoor recreational, resort and residential environments. The existing environment surrounding the Clearwater golf course and resort is perceived as being relatively "tranquil" as it is bound by land zoned "Open Space Community Parks", "Open Space Water and Margins", "Rural Urban Fringe" or "Rural Waimakariri", as can be seen in the image below. As described in Mr Sharp's submission, land surrounding the Clearwater Resort includes the Groynes, Isaac Conservation Park, Waimakariri River Regional Park, and Lake Roto Kohatu.

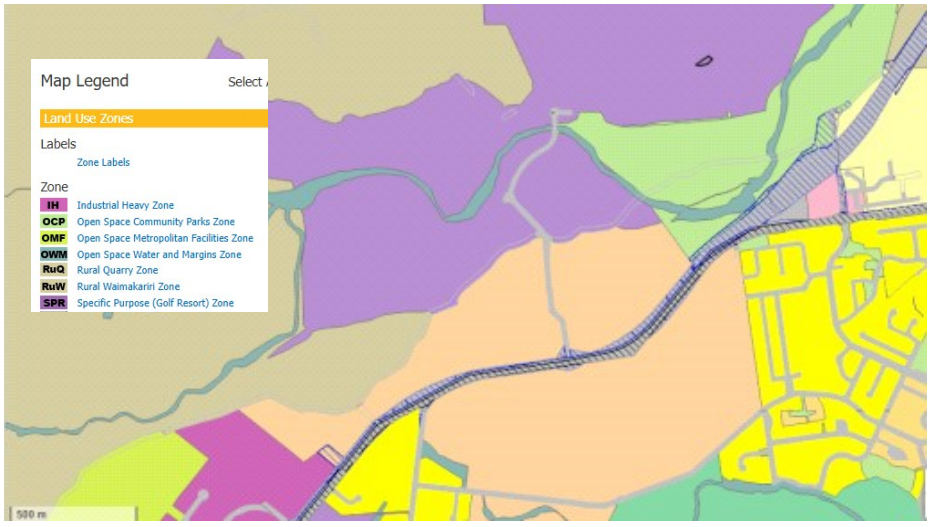


Figure 2: map showing land use zones (Clearwater Resort shown as purple)
Source: Christchurch District Plan GIS maps, accessed 27.8.26

The surrounding land, including the current "Rural Urban Fringe Zone" which is subject to PC24 acts as a buffer between the Clearwater Resort and the Industrial Heavy Zone further to the south-west. Only distant noise emissions associated with road traffic along SH1 or the airport are currently discernible, and due to the areas of rural land surrounding the golf course and residential areas of the resort, Clearwater Resort is currently shielded from activities further afield. PC24 and associated future land uses, if granted, will change this environment, effectively being located on the Resort's doorstep. The overspill of effects into adjoining land (Clearwater Resort) has the potential to be adverse and significant, and may compromise existing golf course and resort operations (including visitor accommodation) and residential amenity.

e. **Loss of Open Space and Rural/Urban Character**: the land subject to the plan change currently zoned "Rural Urban Fringe" and acts as an informal buffer between the existing industrial zone to the west (Harewood North industrial area) and Clearwater Resort. This buffer will be removed if PC24 is approved, enabling the effects described previously to "spill" out of the zone and into Clearwater Resort land.

f. **Supply of General Industrial zoned land**: I support the submission prepared by Mr Sharp on behalf of the Clearwater Golf Club and its members, specifically the lack of an evidential basis for the need for additional general industrial land supply, noting that the Greater Christchurch Spatial Plan identifies that there is currently a significant surplus of industrial land in Greater Christchurch. Selwyn District, particularly Rolleston, has been identified within the Spatial Plan as the preferred location for future industrial growth. The applicant has not demonstrated a need for additional land to be rezoned for industrial purposes, especially in this location, which is directly adjacent to land containing sensitive receivers (including the golf course, residential activities and the Clearwater Golf Resort). These existing and lawfully established land uses (residential, resort and golf course activities) should be protected.

Relief Sought

9. For the reasons set out in this submission, I seek relief that PC24 be declined in its entirety.

10. I request the opportunity to be heard in support of this submission, either individually or jointly with other submitters, and to present further evidence, including independent expert evidence, in support of the matters raised.

Summary

11. Overall, the existing environment surrounding the land subject to PC24 contains sensitive activities including outdoor recreational activities (golf) and residential activities. The proposed change of land use will introduce activities that are incompatible with these, and will result in adverse effects on ecological values (including sensitive waterways), traffic/transport, servicing, and amenity.

12. The applicant has not sufficiently demonstrated that there is a shortage of industrial zoned land, and the rezoning request is an inappropriate and inefficient use of land that will adversely affect existing and lawfully established activities within the surrounding area. The applicant has not sufficiently demonstrated that PC24 will avoid adverse effects on the environment. For these reasons, the plan change application should be declined.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Marilyn **Last name:** Austin

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

LOSS OF RURAL IDENTITY BY REZONING TO INDUSTRIAL--I have lived in Clearwater since 2017, having been attracted there by the peaceful natural rural surroundings and the beauty of the birdlife and sympathetic ecology of the area. This area supports an important environmental system where birdlife flourish and fishlife can breed. The waterways are pristine and the whole area including the Groynes is an important recreational and ecological area for all of Christchurch and overseas visitors. There are so few areas like this that have been left untouched and they should be protected as a natural treasure.

POLLUTION AND DANGER FROM EXTRA TRAFFIC MOVEMENTS.

With the huge extra traffic movements that this new industrial area would generate , the Johns Road motorway would become

even more congested and dangerous to travel on. As a local I do not travel on the motorway after about 3pm as the congestion is so bad that cars are banked up along the area from Harewood Road to Sawyers Arms Road and further. Trying to get around the roundabout at the entrance to Clearwater Avenue is already a dangerous procedure for locals

and visitors. This is going to become so much worse if all this extra traffic is allowed.

POLLUTION TO AIR AND WATERWAYS

This pollution will affect the birdlife and fishlife and the pristine nature of the waterways that flow through the area. These areas are so rare now that they should be protected at all costs.

LOSS OF RURAL FRINGE ZONING

This green buffer is asthetically pleasing to all visitors to this area. The Clearwater Golf Club is recognised world wide for its special rural characteristics, and is a world class facility with views all around of green rural country side. To have a large operational industrial facility able to be seen from any part of the golf course is going to spoil its special rural identity. This golf course hosts overseas visitors and the new BOB CHARLES GOLFING facility and the Golf Course are important to the Christchurch economy as they bring in revenue from overseas visitors. There is abundant industrial land available towards the South of Christchurch, and Rolleston area where the city is naturally progressing.

The reasons for my / our submission are: (use additional pages if required)

Therefore the reasons for my submission are;

Loss of Rural Identity by Rezoning to Industrial.

Pollution and danger from extra traffic movements.

Pollution to Air and Waterways.

Loss of Rural Fringe Zoning .

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

I would like the council to strongly OPPOSE all changes.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 27/08/2026

First name: Laurence **Last name:** Peak

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

I oppose Proposed Plan Change 24, which would rezone land on Johns Road from Rural Urban Fringe to Industrial General.

As a local resident, I am concerned about the impacts this proposal could have on nearby communities, the environment, and the character of the area.

Traffic and Safety

The development is expected to create a significant increase in vehicle movements, including heavy trucks. This will add pressure to Johns Road and the Clearwater Avenue intersection, which is already busy. I am concerned about increased congestion, longer travel times, and road safety for local residents and visitors.

Noise and Light

Industrial activities can create ongoing noise and lighting impacts. I am concerned that increased noise, particularly outside normal business hours, and additional lighting could negatively affect the enjoyment of nearby residential and recreational areas. The proposal does not appear to include sufficient controls to protect surrounding communities from these effects.

Environmental Impacts

The site is connected to waterways within the Ōtūkaikino Stream catchment. I am concerned that construction activities and future industrial operations could increase pollution, sediment runoff, and stormwater impacts, which may further affect water quality and local wildlife habitats.

Uncertainty About Future Industrial Activities

One of my biggest concerns is that the proposal does not clearly identify what types of industrial businesses or activities are intended for the site. "Industrial General" zoning could allow a wide range of activities, each with very different impacts in terms of noise, traffic, dust, lighting, odours, and air quality. I do not believe residents can properly assess the effects of this proposal when there is so much uncertainty about what may ultimately be developed there.

Loss of Open Space and Character

The site currently provides an important open buffer between existing industrial areas and nearby residential and recreational areas. Rezoning this land for industrial use would permanently change the character of the area and remove one of the last remaining areas of open rural land in this location. [Submission...s Society | PDF]

Need for the Rezoning

I am not convinced that enough evidence has been provided to justify the need for additional industrial land in this location, particularly when other industrial land is available elsewhere in Greater Christchurch.

Relief Sought

For the reasons outlined above, I request that Christchurch City Council decline Proposed Plan Change 24.

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Please see above.

The reasons for my / our submission are: (use additional pages if required)

Please see above.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

For the reasons outlined above, I request that Christchurch City Council decline Proposed Plan Change 24.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 27/08/2026

First name: Kaye **Last name:** Lindsay

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

INTRODUCTION AND SUBMITTER'S INTEREST

1. This submission is made by myself as an individual and resident in the area.
2. The submitter, myself, is not in a position to gain advantage in trade competition through this submission.
3. The applicant has taken NO consultation with the submitter on the proposed plan change.
4. My objections relate to the way in which the proposed change will impact negatively on nearby residents as well as the potential damage to the waterways and wildlife living in the region.

The reasons for my / our submission are: (use additional pages if required)

ECOLOGY AND WATERWAYS

This rural area has been an 'open space' ecological region , which includes the Isaac Conservation Park, The Groynes, Waimakiriri River Regional Park and Lake Roto Kōhatu. The proposed area, specifically in the northern corner, is a 'priority area' that impacts on a tributary of the Ōtūkaikino Stream. With the proposed new industrial buildings, my concerns relate to the way in which all this sediment and toxic waste would impact on the already stressed waterways, and harm the wildlife that resides there.

SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 24- JOHNS ROAD, OTAUTAHI

There also remains the risk that toxic sprays would be used on the land which could seep into the aquifers and waterways, causing irreversible damage.
I'm also majorly concerned that that several hyperscale AI Data Centres are planned to

be built in both rural and industrial areas in Aotearoa New Zealand (eg Makarewa in Southland). If one was to be built in this rural area, the water supply could be depleted, as these centres require copious quantities for cooling and operate 24/7. If the toxic chemically-laden contaminated water isn't sufficiently cooled before being released back into the waterways, it would kill the native fish and wildlife in the ecologically fragile Ōtūkaikino Stream.

NOISE, AIR QUALITY and DUST
The noise, dust and construction of any buildings in this region would negatively impact on residents living in this peaceful area, as well as on the precious wildlife.
With the air quality being adversely affected, this could cause significant health impacts on many of the elderly who walk the tracks in this region as a means of improving their health and wellbeing.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

CONCLUSION
I believe that the applicant, JRCD Limited, has not assessed the relevant objective and policies under the Christchurch District Plan, the National Policy Statement of Urban Development 2020, (NPS-UD) and the National Policy Statement for Highly Productive Land 2022.

For the reasons set out above in my submission, I believe that the proposed plan change should not be approved and that the Christchurch City Council should reject this in its entirety.

Attached Documents

Name
CCC SUBMISSION AND OBJECTION PRIVATE PLAN CHANGE 24 - JOHNS ROAD

SUBMISSION AND OBJECTION

IN RESPECT OF PROPOSED PRIVATE PLAN CHANGE 24 – JOHNS ROAD

370 – 448 JOHNS ROAD, RUSSLEY, CHRISTCHURCH

TO:

THE CHIEF EXECUTIVE
CHRISTCHURCH CITY COUNCIL
PO BOX 73015
CHRISTCHURCH 8154

FROM
K LINDSAY
PO BOX 14155
CHRISTCHURCH AIRPORT
CHRISTCHURCH 8544

RE: Proposed change to the Christchurch District Plan requested by JRCD Limited (applicant) under Clause 21 of Schedule 1to the Resource Management Act1991- rezoning of 370,390,432 and 448 Johns Road from Rural Urban Fringe to Industrial General, together with an associated Outline Development Plan and area-specific rules (the Plan Change).

INTRODUCTION AND SUBMITTER'S INTEREST

1. This submission is made by myself as an individual and resident in the area.
2. The submitter, myself, is not in a position to gain advantage in trade competition through this submission.
3. The applicant has taken NO consultation with the submitter on the proposed plan change.
4. My objections relate to the way in which the proposed change will impact negatively on nearby residents as well as the potential damage to the waterways and wildlife living in the region.

ECOLOGY AND WATERWAYS

This rural area has been an 'open space' ecological region , which includes the Isaac Conservation Park, The Groynes, Waimakiriri River Regional Park and Lake Roto Kōhatu.

The proposed area, specifically in the northern corner, is a 'priority area' that impacts on a tributary of the Ōtūkaikino Stream. With the proposed new industrial buildings, my concerns relate to the way in which all this sediment and toxic waste would impact on the already stressed waterways, and harm the wildlife that resides there.

There also remains the risk that toxic sprays would be used on the land which could seep into the aquifers and waterways, causing irreversible damage.

I'm also majorly concerned that that several hyperscale AI Data Centres are planned to be built in both rural and industrial areas in Aotearoa New Zealand (eg Makarewa in Southland). If one was to be built in this rural area, the water supply could be depleted, as these centres require copious quantities for cooling and operate 24/7. If the toxic chemically-laden contaminated water isn't sufficiently cooled before being released back into the waterways, it would kill the native fish and wildlife in the ecologically fragile Ōtūkaikino Stream.

NOISE, AIR QUALITY and DUST

The noise, dust and construction of any buildings in this region would negatively impact on residents living in this peaceful area, as well as on the precious wildlife.

With the air quality being adversely affected, this could cause significant health impacts on many of the elderly who walk the tracks in this region as a means of improving their health and wellbeing.

CONCLUSION

I believe that the applicant, JRCD Limited, has not assessed the relevant objective and policies under the Christchurch District Plan, the National Policy Statement of Urban Development 2020, (NPS-UD) and the National Policy Statement for Highly Productive Land 2022.

For the reasons set out above in my submission, I believe that the proposed plan change should not be approved and that the Christchurch City Council should reject this in its entirety.

K. Lindsay

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 27/08/2026

First name: Beverly **Last name:** Prebble

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Traffic and transportation, noise visual and landscape effects, air quality, dust, loss of open space and rural character

The reasons for my / our submission are: (use additional pages if required)

increased cumulative effect on traffic coming on through gardiners road. Supporting the opposition of neighbours and affected land owners on john road and clearwater environments. Concern for the effect it will have on an unconfined aquifer and water quality of hedges waterway and surrounding spring fed wetland.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

to refuse the application in its entirety

Attached Documents

Name
CCF_000038

Christchurch City Council

Submission on a Publicly Notified Plan Change to the Christchurch District Plan

Resource Management Act 1991 – Form 5

Email to: PlanChange@ccc.govt.nz ; or
Deliver to: Ground floor reception, Christchurch City Council, 53 Hereford Street, Christchurch Attn: City Planning Team; or
Send to: City Planning Team, Christchurch City Council, PO Box 73012, Christchurch, 8154
For enquiries phone: (03) 941 8999

1. I wish to make a submission on:

Plan change name & number: PROPOSED PRIVATE PLAN CHANGE 24 - JOHNS ROAD INDUSTRIAL

2. Submitter details

Full name of submitter: BEVERLY PREBBLE

Street address: 371 GARDINERS ROAD CH. CH

Postal Address (if different):

Contact phone number (daytime): 02745 99328

Postcode: 8051

Email:

My address for service for receiving documents and communication about this plan change is: ☐ By email ☐ By post

3. Submission details

I / We:
- ☐ Support all or part of the plan change
- ☑ Oppose all ~~or part of the plan change~~
- ☐ Am neutral towards the plan change

The specific provisions of the plan change that my / our submission relates to are: *(give details, using additional pages if required)*

TRAFFIC + TRANSPORTATION, NOISE VISUAL + LANDSCAPE EFFECTS AIR QUALITY, DUST LOSS OF OPEN SPACE + RURAL CHARACTER

The reasons for my / our submission are: *(use additional pages if required)*

INCREASED CUMULATIVE EFFECT ON TRAFFIC COMING ON THROUGH GARDINERS ROAD

SUPPORTING THE OPPOSITION OF NEIGHBOURS + AFFECTED LAND OWNERS ON JOHNS RD + CLEARWATER ENVIRONMENTS CONCERN FOR THE EFFECT IT WILL HAVE ON AN UNCONFINED AQUIFER + WATER QUALITY OF HEDGES WATERWAY + SURROUNDING SPRING FED WETLAND

The decision I / we would like the Council to make is: *(give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of any conditions sought. Use additional pages if required)*

TO REFUSE THE APPLICATION IN ITS ENTIRETY

4. Trade competition

I / We: ☒ ~~could~~ / ☐ **could not** gain an advantage in trade competition through this submission.

If you are a person who could gain advantage in trade competition through this submission, are you directly affected by and effect of the proposed plan charge/part of the plan change that –

a) adversely affects the environment, and

b) does not relate to the trade competition or the effects of trade competition?

☐ Yes ☐ No

5. Hearing of this plan change

If a hearing is held, I / we:

☐ **Wish to** speak in support of my / our submission

☑ **Do not wish to** speak in support of my / our submission

☐ If others make a similar submission I / we will consider presenting a joint case with them at the hearing

Please note that a hearing will only be held if any of the submitters wish to be heard, but all submissions will be taken into consideration regardless.

If you change your mind about whether you wish to speak at the hearing, please contact the Council by telephone on 941 8999 or by email at PlanChange@ccc.govt.nz.

6. Signature (of submitter(s) or person authorised to sign on behalf of submitter(s)

Signature: B J. Prebble. Date: 23-8-26

Signature: Date:

Note: A signature is not required if you make your submission electronically

Important information

1. The Council must receive your submission before the closing date and time for submissions on this plan change.
2. If you are a trade competitor, your right to make a submission may be limited by the provisions in Part 11A of the RMA.
3. The Council may strike out a submission (or part of it) in the following situations:
   - It is frivolous or vexatious
   - It discloses no reasonable or relevant case
   - It would be an abuse of the hearing process to allow it to be taken further
   - It contains offensive language
   - It is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matters.

Privacy information

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker).

Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this plan change prior to making your submission.

Office use only

Received at the ..... Office on ..... at ..... am / pm

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 27/08/2026

First name: Michael **Last name:** Sharp

On behalf of:

Clearwater Resort Owners' Society Incorporated

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

see the attached submission

The reasons for my / our submission are: (use additional pages if required)

see the attached submission

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

see the attached submission

Attached Documents

Name
Submission on PPC24 - Clearwater Resort Owners Society (Signed)

Christchurch City Council

T24Consult Page 88 of 212

Submission on a Publicly Notified Plan Change to the Christchurch District Plan

Resource Management Act 1991 – Form 5

Email to: PlanChange@ccc.govt.nz ; or
Deliver to: Ground floor reception, Christchurch City Council, 53 Hereford Street, Christchurch Attn: City Planning Team; or
Send to: City Planning Team, Christchurch City Council, PO Box 73012, Christchurch, 8154

For enquiries phone: (03) 941 8999

1. I wish to make a submission on:

Plan change name & number: 24. 370-448 Johns Road, Russley

2. Submitter details

Full name of submitter: Clearwater Resort Owners' Society Incorporated.
Street address: 38 Clearwater Avenue, Northwood, Christchurch 8051
Postal Address (if different): Po Box 36211, Merivale, Christchurch
Contact phone number (daytime): 021 314 481 Postcode: 8146
Email: michael@newsealand.co.nz

My address for service for receiving documents and communication about this plan change is: ☑ By email ☐ By post

3. Submission details

I / We:
- ☐ Support all or part of the plan change
- ☑ Oppose all or part of the plan change
- ☐ Am neutral towards the plan change

The specific provisions of the plan change that my / our submission relates to are: *(give details, using additional pages if required)*

See the attached submission

The reasons for my / our submission are: *(use additional pages if required)*

See the attached submission

The decision I / we would like the Council to make is: *(give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of any conditions sought. Use additional pages if required)*

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I / We: ☐ **could** / ☑ **could not** gain an advantage in trade competition through this submission.

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a) adversely affects the environment, and

b) does not relate to the trade competition or the effects of trade competition?

☐ Yes ☐ No

5. Hearing of this plan change

If a hearing is held, I / we:

☑ **Wish to** speak in support of my / our submission

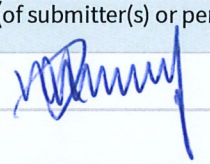
☐ **Do not wish to** speak in support of my / our submission

☑ If others make a similar submission I / we will consider presenting a joint case with them at the hearing

Please note that a hearing will only be held if any of the submitters wish to be heard, but all submissions will be taken into consideration regardless.

If you change your mind about whether you wish to speak at the hearing, please contact the Council by telephone on 941 8999 or by email at PlanChange@ccc.govt.nz.

6. Signature (of submitter(s) or person authorised to sign on behalf of submitter(s)

Signature:		Date:	26. 8. 26.
Signature:		Date:	

Note: A signature is not required if you make your submission electronically

Important information

1. The Council must receive your submission before the closing date and time for submissions on this plan change.
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   - It discloses no reasonable or relevant case
   - It would be an abuse of the hearing process to allow it to be taken further
   - It contains offensive language
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Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

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Office use only

Received at the …… Office on …… at …… am / pm

SUBMISSION AND OBJECTION

IN RESPECT OF PROPOSED PRIVATE PLAN CHANGE 24 — JOHNS ROAD

370–448 Johns Road, Russley, Christchurch (JRCD Limited)

To:
The Chief Executive
Christchurch City Council
PO Box 73015
Christchurch 8154

From:
Michael Sharp
Manager
Clearwater Resort Owners Society Incorporated

Re:
Proposed change to the Christchurch District Plan requested by JRCD Limited ("applicant") under Clause 21 of Schedule 1 to the Resource Management Act 1991 — rezoning of 370, 390, 432 and 448 Johns Road from Rural Urban Fringe to Industrial General, together with an associated Outline Development Plan and area-specific rules ("the Plan Change").

Introduction and Submitter's Interest

1. This submission is made on behalf of Clearwater Resort Owners' Society Incorporated ("the submitter"). The submitter objects to the Plan Change in its entirety, and to each of its constituent provisions, for the reasons set out below.

2. The submitter is a society incorporated under the Incorporated Societies Act 2022. The society has 206 members, and all are owners of developed or developable properties at Clearwater Resort, 38 Clearwater Avenue, Northwood, Christchurch 8051.

3. The submitter's affairs are managed by a committee that is elected annually at an annual meeting. The committee members approved this submission at a meeting on 20 August 2026. It is likely that members of the society will prepare individual submissions in support of this submission.

4. The submitter is not in a position to gain an advantage in trade competition through this submission.

5. The applicant has undertaken no consultation with the submitter on the proposed Plan Change.

6. The location of Clearwater Resort in relation to the applicant's land is highlighted in the image below.



7. The submitter has a direct interest in the Plan Change as the operator of Clearwater Resort, an integrated hotel / residential / golf resort located immediately to the north and east of the Plan Change site, whose members, residents, visitors and guests rely on the existing rural and open space character and ecological amenity of the surrounding area including the Groynes, Isaac Conservation Park, Waimakariri River Regional Park, and Lake Roto Kohatu.

8. The submitter's interests span recreation, tourism and hospitality, and landholding, and are directly and materially affected by the traffic, noise, ecological, lighting, visual, air quality and reverse sensitivity effects addressed in this submission. All are activities lawfully established well in advance of the Plan Change request.

9. This submission is structured by topic, addressing ecology and waterways, stormwater management, services, traffic and transportation, noise, lighting and night sky, visual and landscape effects, air quality and dust, reverse sensitivity, loss of open space and rural-urban character, and the economic case advanced in support of the Plan Change.

10. The submitter reserves the right to supplement this submission with independent expert evidence, including acoustic, traffic engineering, ecological, and landscape evidence, and requests the opportunity to be heard further in support of the matters raised.

    If others make a similar submission, the submitter will consider presenting a joint case with them at a hearing.

Statutory Framework

11. This submission is made having regard to the framework applicable to a private plan change request under Part 2 of Schedule 1 to the Resource Management Act 1991, including the Council's discretion to accept, adopt or reject the request under Clause 25, the requirement for an evaluation report under Section 32, the matters the Council must consider under Sections 74 and 75, and the higher-order documents identified by the applicant itself as relevant, including

the National Policy Statement on Urban Development 2020, the National Policy Statement for Freshwater Management, the Canterbury Regional Policy Statement, the Greater Christchurch Spatial Plan, and the Mahaanui Iwi Management Plan 2013.

Ecology and Waterways (Ōtūkaikino Stream Catchment and Downstream Receiving Environments)

12. The site adjoins, and its northern corner intersects, a tributary of the ecologically significant Ōtūkaikino Stream. This is treated as a priority area of scrutiny given the direct and cumulative downstream connection to a site of Ecological Significance and mapped At-Risk native fish habitat.

13. Existing water quality in the Ōtūkaikino Stream and its tributaries are already below the relevant regional plan target, raising a precautionary concern about additional contaminant and sediment loading from heavy industrial land use. Additional stormwater discharge, sediment, or contaminant loading associated with heavy industrial subdivision and use has the potential to further degrade an already-stressed waterway. The submitter objects that the proposal has not adequately assessed the capacity of an already degraded waterway (dissolved oxygen below the regional plan target) to absorb the additional contaminant and sediment loading reasonably anticipated from heavy industrial subdivision and use of the scale proposed.

14. A threatened native fish species' spawning habitat lies a short distance downstream of the site within the same waterway system. No species-level monitoring, triggers, or adaptive management mechanism is proposed to detect or respond to adverse effects on this habitat arising from construction or ongoing operational discharges. The applicant's position is that the presence of the habitat is acknowledged and noted as a potential cumulative effects receptor (paragraph 91), but no species-specific monitoring or adaptive management response is proposed in the Plan Change provisions. The submitter objects that no monitoring or adaptive management mechanism has been proposed to protect the mapped At-Risk Canterbury galaxias spawning habitat located a short distance downstream of the site, notwithstanding the scale of development enabled.

15. The riparian margin protecting the waterway relies on a 20m development setback and 10m planting buffer rather than a more robust and enduring protective mechanism, and no long-term funding, maintenance or enforcement mechanism is specified. The applicant's position is that the 20m buffer is 'sufficient to provide protection and enhancement' notwithstanding the more protective zoning option being rejected on the stated basis of Council's reluctance to accept land ownership. No mechanism (such as a consent notice, covenant, or body corporate maintenance obligation binding all future lot owners) is specified to ensure the buffer planting is established, survives, and is maintained in perpetuity once the site is subdivided into numerous individual industrial titles.

16. Erosion and sediment control during construction is not addressed by specific plan-change-level standards. Given the scale of earthworks anticipated for a 19ha, up to 200-lot industrial subdivision adjoining a waterway and wetland already below water quality targets, uncontrolled or inadequately controlled construction-phase sediment discharge represents a material risk to receiving waters. No specific performance standards, monitoring frequency, or enforcement

pathway is proposed within the Plan Change itself - the safeguard is wholly reliant on a subsequent, separate consent process not yet before Council. The submitter objects that construction-phase erosion and sediment control is not addressed by any specific standard within the Plan Change itself, notwithstanding the scale of earthworks anticipated adjoining a sensitive waterway and wetland.

17. Investigation of potential springs feeding the on-site waterway is incomplete, with the relevant part of the site not accessed, yet the report concludes springs are 'not expected to be impacted'. Groundwater interception or disturbance during earthworks and subdivision could adversely affect spring-fed hydrology supporting the waterway. The applicant relies on existing District Plan subdivision rules to require spring investigation at the time of future subdivision - the matter is deferred rather than resolved. The submitter objects that the conclusion that springs feeding the waterway will not be adversely affected is not yet supported by completed investigation, given the relevant area of the site has not been accessed.

Stormwater Management

18. Stormwater management relies on discharge to ground via soakage, without current groundwater level data. The absence of current groundwater level data introduces uncertainty as to which stormwater management approach will ultimately be required, and whether soakage-based discharge will perform adequately across the site given variable groundwater conditions. No detailed stormwater design has yet been prepared, tested, or subjected to independent review. The submitter objects that the feasibility of the proposed stormwater management approach has not been demonstrated with current groundwater data, detailed design and independent review.

19. The applicant identifies groundwater flow direction as “generally to the east”, potentially towards Clearwater Resort to the northeast. The applicant’s stormwater approach defers detailed design assessment to subdivision stage which poses a significant risk of contaminants from the site travelling towards areas where residential, recreational, and other sensitive uses exist.

Services

20. The PC24 site is not currently serviced by the reticulated wastewater network. The proposal was originally submitted seeking Industrial Heavy zoning but was subsequently dialled back in direct response to identified wastewater constraints. The submitter suggests that any connection to the Council system should be applicant funded and subject to elevated development contributions.

    The applicant has provided network capacity modelling which indicates that, under an ultimate growth scenario, Council wastewater network thresholds will be exceeded, however no immediate upgrades are proposed as part of the Plan Change.

Traffic and Transportation

21. The site fronts, and gains access from, a section of State Highway 1 / Johns Road that also serves as the primary access corridor for Clearwater Resort via the Clearwater Avenue intersection.

22. The applicant's own traffic modelling identifies increased delay specifically at the SH1 Johns Road / Clearwater Avenue intersection - the gateway intersection serving the golf course, resort and residential community - yet this has not been assessed in the context of golf, resort or event-related traffic patterns. The modelling predicts an increased PM peak northbound approach delay at the Clearwater Avenue intersection from 34 seconds to 52 seconds. No assessment has been presented of how this increased delay interacts with existing traffic patterns generated by Clearwater residents, golf club members and visitors (including tee-time clustering), resort guest arrivals/departures and functions, or tournament and event days when traffic volumes at this intersection are materially higher than an average weekday. The submitter objects that the increased delay identified at the SH1/Clearwater Avenue intersection has not been assessed against golf club, resort and event-related traffic patterns, which are the periods of greatest relevance and sensitivity to the submitter's operations.

23. No assessment has been presented of the interaction between new industrial heavy vehicle movements and existing recreational and resort-related vehicle movements along Johns Road / SH1 and at the Clearwater Avenue intersection. The proposal is predicted to generate 176 vehicle movements per hour at peak times, comprising 147 light and 29 heavy vehicle movements. No specific assessment addresses how these movements, including heavy vehicles associated with subdivision development and ongoing industrial activity, will interact with golfers, residents, and resort guests using the shared path facilities identified as linking to the site. Road safety auditing is deferred to a future detailed design stage rather than informing the current assessment. This is relevant to road safety and the submitter objects that the interaction between new heavy vehicle movements and existing vehicle movements has not been specifically assessed.

24. The proposal adds to an already acknowledged, unfunded network congestion issue at the Sawyers Arms Road roundabout, contrary to the RPS's own stated environmental outcome for network congestion management. The submitter objects that the proposal adds to an already unfunded and acknowledged network congestion issue on the SH1 corridor, contrary to the Regional Policy Statement's own stated outcome for network congestion management, without adequate assessment of cumulative effects.

25. The design of the site access intersection with SH1 is not finalised and is deferred to a future subdivision detailed design stage, subject to further NZTA consultation. There is a risk that the ultimately agreed design could differ from what is currently relied upon to support the traffic conclusions in this report. The submitter objects that the Plan Change is being advanced on the basis of an unresolved, concept-level intersection design that remains subject to further agreement with NZTA.

26. No independent traffic assessment has yet been obtained to test the applicant's modelling assumptions. The traffic conclusions rely entirely on modelling commissioned by the applicant (Novo Group's ITA, supported by QTP modelling). No independent verification of trip generation rates, distribution assumptions, or intersection modelling has been undertaken on behalf of affected parties.

Noise

27. The Plan Change does not propose any site-specific noise rules calibrated to the interface with Clearwater Resort.

28. No site-specific noise limits, measurement locations, or attenuation requirements are proposed for the interface between future industrial activity and the adjoining golf course, resort and residential receiving environment. Standard Industrial General zone noise standards are typically calibrated primarily to a residential interface. No assessment has been presented of whether those standard limits, measured at standard locations, adequately protect the specific and different sensitivities of an outdoor resort environment and overnight guest accommodation at the resort, both of which may be more sensitive to certain noise characteristics (e.g. early morning start-up noise, reversing alarms, intermittent impulsive noise) than a standard residential dwelling. The submitter objects that no site-specific noise assessment or rule has been proposed for the interface between the proposed industrial zoning and the adjoining golf course, resort accommodation and residential community, notwithstanding that other interface effects (setbacks, landscaping) have been specifically addressed.

29. Construction-phase noise and vibration during subdivision earthworks, wetland works, and intersection/road construction has not been assessed. Construction of a 19ha subdivision, including intersection upgrade works on SH1 and stormwater management area earthworks, will generate a sustained period of construction noise and vibration in proximity to outdoor recreational activity and overnight guest accommodation, both activities for which disturbance has a direct commercial and experiential impact. This matter does not appear to have been specifically addressed by the applicant. The submitter objects that construction-phase noise and vibration effects on the golf course and resort have not been assessed.

30. No assessment has been presented of night-time or extended-hours operational noise, notwithstanding the Industrial General zone can permit extended hours of operation. The resort's residential and overnight guest accommodation is a noise-sensitive activity for the full 24-hour period, in a manner different from standard residential exposure patterns. No operational hours restriction or night-time noise standard specific to this interface has been proposed. The submitter objects that night-time and extended-hours operational noise effects on the resort's overnight guest accommodation have not been assessed.

Lighting and Night Sky

31. The applicant expressly acknowledges that no controls over night-time lighting are proposed, and that light pollution 'may eventuate', without assessing the specific effect on the golf course, resort

or residential amenity. Uncontrolled industrial lighting adjoining a golf course and a resort that relies on a rural, dark, open outlook as part of its accommodation and hospitality offering has the potential to materially change the night-time character and visual amenity experienced by golf course users at dawn/dusk periods, and by resort guests from accommodation, function spaces and grounds. The submitter objects that no lighting controls are proposed for the interface with the golf course and resort, notwithstanding the applicant's own acknowledgment that light pollution may result.

Visual and Landscape Effects

32. The landscape and visual assessment's conclusion that effects are acceptable is not tested from golf-course or resort-specific viewpoints. The general conclusion that the site 'reinforces existing adjacencies' and does not create 'abrupt or sensitive transitions' is reached at a broad landscape-character level. It does not specifically evaluate the visual experience from golf course fairways, greens, and clubhouse areas, or from resort guest accommodation, function spaces and grounds, where the working industrial subdivision would become part of the visible outlook in place of the existing open pasture and rural character. The submitter objects that the landscape and visual assessment does not include analysis from specific golf course and resort viewpoints.

Air Quality and Dust

33. Dust management relies solely on future Regional Air Plan consenting, with no plan-change-level dust management conditions for the construction phase. Construction of a 19ha, up to 200-lot industrial subdivision, including significant earthworks, has clear potential to generate airborne dust. A golf course is a use particularly sensitive to airborne dust and particulate deposition, which can affect turf health, playing surface quality, and player experience, in addition to general amenity effects on residents and resort guests using outdoor grounds and facilities. The submitter objects that construction dust effects on the adjoining golf course, a particularly dust-sensitive land use, have not been specifically assessed.

34. No assessment has been presented of odour or air discharge risk associated with the range of activities that could establish under the Industrial General zone, in relation to outdoor recreation and accommodation receptors. The Industrial General zone permits a wide range of activities, several of which have the potential to generate odour or air discharges (e.g. certain manufacturing, processing, or storage activities). No assessment has been presented of this risk in relation to a receiving environment that includes outdoor recreational activity. The submitter notes, and reserves the right to expand upon with further evidence, a concern that the range of activities enabled by the Industrial General zone has not been specifically assessed for odour or air discharge risk to the adjoining golf course and resort.

Reverse Sensitivity

35. The applicant's Reverse Sensitivity assessment addresses only Christchurch International Airport, NZTA, and generic Rural Urban Fringe land — it contains no specific analysis of the golf course, resort, or residential estate, despite these being identified in the applicant's own site description as immediately adjoining and nearby land uses. Heavy industrial-type activity established directly opposite and adjacent to an operating golf course and integrated resort creates a foreseeable risk that new industrial occupiers may, over time, generate complaints about existing, lawful golf and resort operational activities (for example, early morning course maintenance, mowing, irrigation, spraying, functions and events, or floodlighting for evening functions), creating pressure to constrain those pre-existing lawful activities. The submitter objects that the Plan Change's Reverse Sensitivity assessment omits any specific analysis of the golf course, resort or residential estate, notwithstanding these being identified as immediately adjoining or proximate land uses in the applicant's own site description.

36. No mechanism is proposed to manage future complaint risk from new industrial occupiers toward the pre-existing lawful golf, resort and residential activities. Without a mechanism such as a reverse sensitivity acknowledgment registered against future industrial titles (recording the presence of, and accepting the lawful effects associated with, the adjoining recreation and tourism activities), there is a risk that new industrial occupiers, unaware of or unaccustomed to an adjoining recreation and tourism environment, could later seek to restrict lawful golf course or resort operations through complaint. The submitter objects that no reverse sensitivity acknowledgment or covenant mechanism is proposed to be registered against future industrial titles to protect the pre-existing lawful operation of the golf course and resort.

Loss of Open Space and Rural / Urban Character

37. The proposal removes the last remaining open rural/pastoral land functioning as an informal landscape and amenity buffer between the existing industrial zone and Clearwater Resort. The 19ha site currently provides open pastoral character between the existing Industrial Heavy zone to the west and Clearwater Resort to the east. Its rezoning to Industrial General removes this land as an informal buffer, with the only remaining separation being the proposed 10–20m setback and landscaping strips. The submitter objects that the proposal removes the last remaining area of open rural character buffering Clearwater Resort from existing industrial land, without this cumulative loss of character being specifically assessed.

38. Approval of this Plan Change would close the remaining gap between the existing Harewood North industrial area and Clearwater Resort, creating a risk of setting a precedent for further industrial expansion toward Clearwater Avenue. If approved, the site would represent the full eastward extension of industrial zoning to the edge of Clearwater Resort, potentially establishing a precedent that could be relied upon by future applicants seeking further industrial rezoning closer to, or within, the Clearwater area.

Economic Case

39. The economic case is tested here in the spirit of Section 32, not simply opposed as a matter of principle.

40. The claimed absence of vacant freehold industrial land in 'Harewood North' has not been independently verified, and the applicant's own evidence suggests the adjoining 'Harewood South' Industrial Park undersupply may reflect a zoning/market mismatch rather than genuine citywide land shortage. If the underlying issue in Harewood South is that the Industrial Park zoning does not suit current market demand (as the applicant's own evidence at paragraph 125 suggests: 'this zone has not attracted any significant development during the last 10 years'), then the appropriate response may be to address zoning settings or land use within the existing urban area, rather than to extend the urban boundary through a new greenfield rezoning, consistent with the RPS's consolidation-first policy direction. The submitter raises a concern that the Plan Change's 'no alternative supply' narrative has not been independently verified, and that the underlying issue in the adjoining Industrial Park zoned land may reflect a zoning/market mismatch rather than a genuine absence of developable industrial land in the locality.

41. The Greater Christchurch Spatial Plan is a strategic document which identifies appropriate locations for new and expanded industrial zones, which Councils are to give effect to through their planning documents. The Spatial Plan was implemented to satisfy the requirements under the NPS-UD, which provides national direction on how urban growth ought to occur.

    The Spatial Plan identifies that there is currently a significant surplus of industrial land in Greater Christchurch (645ha over 30 years) and identifies Selwyn District, particularly Rolleston, as the preferred location for future industrial growth. The applicant relies on the "responsive planning" provisions of the NPS-UD to circumvent this.

    For Greater Christchurch, the assessment identifies that there is likely to be sufficient industrial land for the next 30 years and beyond and therefore there is no need for additional industrial land to be rezoned, especially at this location.

Relief Sought

42. For the reasons set out in this submission, the submitter's position is that the Plan Change should not be approved.

43. The submitter requests the opportunity to be heard in support of this submission, and to present further evidence, including independent expert evidence, in support of the matters raised.

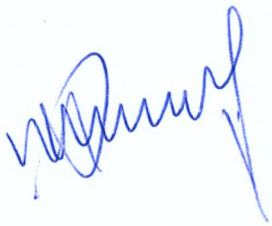
Conclusion

44. The Plan Change would introduce a significant industrial rezoning immediately adjoining, and in parts within the same waterway catchment as, an operating golf course, a resort accommodation and hospitality operation, and an established residential community. The applicant's own Section 32 report contains a comprehensive assessment of many matters, but, on the material available to the submitter, does not specifically or adequately assess the effects of the proposal on the golf course, resort or residential community as receiving environments in their own right, particularly in relation to reverse sensitivity, noise, lighting and traffic at the Clearwater Avenue interface. Several of the mitigations the report otherwise relies upon, including wetland and riparian protection, stormwater treatment, erosion and sediment control, and intersection design, are deferred to later, separate consent processes rather than secured now.

45. The submitter(s) considers the applicant's proposal lacks sufficient information, including an adequate s32 assessment, for a decision maker to be satisfied it holds the required information to determine the Plan Change pursuant to the RMA, including regarding the assessment of environmental effects.

    The applicant has failed to adequately assess the relevant objectives and policies under the Christchurch District Plan, and other higher order planning instruments, including the National Policy Statement of Urban Development 2020 (NPS-UD) and National Policy Statement for Highly Productive Land 2022.

Signed:



Michael Sharp
Manager and Authorised Agent
Clearwater Resort Owners' Society

Date: 25.8.26

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 27/08/2026

First name: Joel **Last name:** Brading

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

All (see attached)

The reasons for my / our submission are: (use additional pages if required)

Traffic issues, land not in Christchurch's planned urban growth boundaries (see attached)

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

Decline the application (see attacehd)

Attached Documents

Name
PPC24 Submission

Submission Opposing Private Plan Change 24 (Johns Road Industrial)

To Christchurch City Council,

I strongly oppose Private Plan Change 24 and respectfully request that it be declined in full.

In summary, my objection is based on two fundamental concerns. First, the existing road network, particularly Johns Road, Gardiners Road and the surrounding intersections, is already under significant pressure. This proposal would add further industrial traffic, including heavy vehicles, before the necessary transport upgrades are funded, committed to or delivered. Secondly, this is the wrong location for industrial rezoning. The site sits outside Christchurch's planned urban growth areas and is close to environmentally sensitive waterways, Willowbank Wildlife Reserve and The Groynes, while industrially zoned land already exists elsewhere in the city. The permanent loss of rural fringe land in this location is not justified.

As a property owner at the northern end of Gardiners Road, approximately 250 metres from the proposed industrial zone, I am directly affected by this proposal. I have serious concerns about the permanent impact it would have on our local community, the transport network, environmental values, rural character and residential amenity.

My primary concern is traffic. The applicant's own assessment acknowledges that Johns Road already carries approximately 30,000 vehicle movements per day, that congestion already exists, and that the development would generate additional traffic, including heavy industrial vehicles. In my view, it is inappropriate to approve further industrial zoning in this location when the existing network is already constrained, and the required transport improvements are not yet in place.

The effects would not be limited to Johns Road. The proposal does not adequately address the traffic impact on surrounding local roads, particularly Gardiners Road, which is already being used as a throughfare by motorists seeking to avoid daily congestion on Johns Road. Traffic regularly queues back beyond Styx Mill Road during peak periods, and congestion is becoming increasingly common throughout the wider Northwood and Styx area. Adding industrial traffic to this environment would worsen delays, increase safety risks and place further pressure on roads that are not designed to accommodate this level or type of movement.

I am also concerned that the proposal seeks to industrialise land outside Christchurch's planned urban growth boundaries. The applicant acknowledges that the site lies outside the existing urban area and that the proposal is contrary to policy direction in the Canterbury Regional Policy Statement and Christchurch District Plan, which seek to avoid unplanned urban development outside identified growth areas.

Industrial growth should occur where it has been strategically planned and supported by infrastructure, not through ad hoc expansion into the rural fringe.

The justification for the rezoning is not persuasive. While the applicant refers to demand for industrial land, there is already industrially zoned land elsewhere in Christchurch, including areas that have been specifically planned and serviced for this purpose. A developer's preference for this particular site should not override the planning framework or justify the permanent loss of Rural Urban Fringe land. Existing industrial land should be used before further rural land is rezoned.

I am particularly concerned about the environmental risks. The site is adjacent to Hedges Waterway and forms part of a wider ecological network connected to the Ōtūkaikino Stream, The Groynes and surrounding waterways. The applicant's ecological assessment identifies risks associated with stormwater, sediment, contaminants and cumulative downstream effects. Industrial development introduces long-term risks to this sensitive environment, and any failure in stormwater management or environmental controls could have consequences that are difficult, if not impossible, to reverse.

The wider area contains some of Christchurch's most valued environmental and recreational assets, including Willowbank Wildlife Reserve, The Groynes, Lake Roto Kohatu and associated waterways. These places are valued by residents and visitors and contribute significantly to the character of northern Christchurch. Industrial expansion into this area is inconsistent with those environmental, recreational and amenity values.

I am also concerned about the consultation process. Having spoken directly with the owner of 448 Johns Road, I understand they were not aware their property had been included in the rezoning proposal and do not support it being rezoned. It is difficult to understand how a property can be included in a private plan change of this nature without the owner's knowledge or consent. This raises serious questions about whether directly affected landowners have been properly informed, consulted and meaningfully engaged before a proposal was lodged that could fundamentally alter the future use, value and character of their land.

The proposal would also permanently remove an important rural buffer between existing urban/industrial activity and nearby residential, recreational and environmentally sensitive areas. The current Rural Urban Fringe zoning provides a clear and appropriate transition between urban and rural environments. Once this land is industrialised, the open character, outlook and amenity currently experienced by the surrounding community will be permanently lost.

For these reasons, I strongly oppose Private Plan Change 24. The proposal would intensify traffic and infrastructure pressure on an already constrained road network,

particularly Johns Road, Gardiners Road and surrounding intersections, before necessary upgrades are funded or delivered. It would also put industrial activity in the wrong location, outside Christchurch's planned urban growth areas and beside sensitive environmental and recreational assets, including Willowbank Wildlife Reserve, The Groynes and local waterways. In my view, the traffic impacts, environmental risks, lack of strategic planning justification and permanent loss of rural fringe land make this proposal inappropriate. I respectfully request that Christchurch City Council decline Private Plan Change 24 in its entirety.

Yours faithfully,

Joel and Liz Brading

027 490 6955 (Joel)

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 27/08/2026

First name: ian **Last name:** Petrie

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing: The existing zoning, RURAL, was set by the council in their long term plan. Normally 30 years. I trust the council but i do not trust developers. I dont believe developers should get involved in changing the councils long term plans. I would assume that the developer has an option to purchase the land, subject too a change of use. Developers are only profit driven and should not get the councils approval to change the zoning from Rural to Industrial. We purchased a home at the Clearwater resort some 7 years ago ,we purchased because we had a rural surroundings and no air, water or noise polution. The streams that run through the resort has, as, the name states, clear water, wonderful bird life, peace and quite. The council should decline the Proposed Plan Cange 24

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The council has a long term plan for the city and region, why shoud a council approve a developers submission for a change.

The change will not comply with the reason a Resort and Golf coarse and housing development was approved many years ago.

People have moved to the Clearwater Resort for the life style and rural outlook.

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

We dont need the problems of living next to an industrial zoned land.

The reasons for my / our submission are: (use additional pages if required)

A resident of Clearwater Resort, a CROSS member and a Golf Club member.

Object to extra Traffic noice and access, Industrial Noise, Water contamination, damage to the Eco surrondings in a rural zone.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

Decline the developers application to change the Rural zone to Industrial

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 27/08/2026

First name: Tim **Last name:** Smith

Organisation: Smith Crane & Construction Ltd

On behalf of: Smith Crane & Construction Ltd

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Support all or part of the plan change

I am managing Director Of Smith Crane & Construction

We own 11 Hectares directly to the South of the proposal & lease on a 100 year term a further 11 hectares to the south west

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The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

we believe the plan change should extend to include this 11 hectare block (ecan block to south west)which connect the current industrial area in the formed part of the western end of sawyers arms rd

there is paper roads already in place the connects this area

this would improve access & roading & keep traffic from joining this proposed area from the state highway

would also provide excellant transport links to south & airport

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The reasons for my / our submission are: (use additional pages if required)

better safer roading network

Christchurch City Holdings/Airport have wasted valuable industrial Land with excellent connectivity& transport efficiency to Airport by using it for Solar Farm

I have nothing against Solar Farm however its in wrong location & should have been built further west (I understand power is being sold to Fontera Darfeild thus closer to energy need also)

Due to this significant reduction in supply more land for industry & bussines needs to be made available

where our close by Industrial land is utelised for bussiness particulaly in close location to airport

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The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

approve & extend

PC24 - Johns Road Industrial

Submitter Details

Submission Date: 27/08/2026

First name: Lee and John **Last name:** McVicar

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

see attached

The reasons for my / our submission are: (use additional pages if required)

see attached

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

see attached

Attached Documents

Name
PPC24_Submission_5_Clearwater_Avenue_McVicar

Submission in Opposition: Proposed Private Plan Change 24 (Johns Rd)

Proposed rezoning of approximately 19 hectares at 370–448 Johns Road from Rural Urban Fringe to Industrial General

Submitter details and formal matters

1. **To:** Christchurch City Council — planchange@ccc.govt.nz; Civic Offices, 53 Hereford Street, Christchurch.

2. **Submission on:** Proposed Private Plan Change 24 — Johns Road Industrial (PPC24), requested by JRCD Limited and publicly notified on 30 July 2026. This is a submission on a proposed change to the Christchurch District Plan, made under clause 6 of Schedule 1 to the Resource Management Act 1991.

3. **Submitters:** J McVicar & L McVicar

4. **Address for service:** 5 Clearwater Avenue, Christchurch 8051. Email: lee.ewing@xtra.co.nz Phone: 021 440 366.

5. **Trade competition:** We could not gain an advantage in trade competition through this submission. This submission is made in our personal capacity as owners and occupiers of residential property immediately nearby the plan change area. It is not made on behalf of, in the interests of, or by reference to the interests of any business.

6. **We oppose the plan change:** We oppose PPC24 in its entirety. Without limiting that, we oppose the proposed rezoning of the whole plan change area from Rural Urban Fringe to Industrial General; the proposed Industrial General Zone (Johns Road) Outline Development Plan to be inserted at Appendix 16.8; the proposed area-specific rules to be inserted into Rule 16.4, including P1–P3, RD1–RD3 and NC1–NC3 and the building-setback and landscaped-area standards; and the associated new matters of discretion to be inserted into Rule 16.7.3.

7. **Reasons and relief:** The reasons for our submission, and the decision we ask the Council to make, are set out in this document. The relief we seek is set out immediately below and is repeated at paragraphs 103 and 104.

8. **We wish to be heard:** We wish to be heard in support of our submission. If others make a similar submission, we will consider presenting a joint case with them at the hearing.

9. **Evidence:** We intend, where appropriate, to call or rely on expert evidence in support of the grounds raised in this submission and to address evidence subsequently produced by the applicant — including planning, economic, transport and road-safety, acoustic, lighting, hydrological and hydrogeological, ecological and landscape evidence. We also intend, where appropriate, to call evidence of fact from residents, owners and occupiers of properties adjoining or near the plan change area.

Relief sought

10. We oppose PPC24 and seek that it be declined in its entirety, with the land retaining its Rural Urban Fringe zoning. That is our primary relief.

11. If the Council is not prepared to decline PPC24 and considers that material transport, groundwater, wetland, stormwater, infrastructure or other site-suitability matters cannot properly be determined on the evidence before it, we seek that determination be adjourned or deferred, to the extent lawfully available, until sufficient information is available to determine those matters. That may include, as relevant, completion of comprehensive site-verified (including 448 Johns Road) and seasonally continuous, wetland and ecological assessments, and updated transport assessment of the Industrial General proposal and its cumulative network and road-safety effects. This secondary relief does not imply that further information would cure our primary strategic objection.

12. If the Council is not prepared to decline PPC24, and does not defer its determination, we seek as a further alternative that any rezoning exclude 370 Johns Road, and that the Outline Development Plan, the area-specific provisions and the staging and structuring elements be amended accordingly. Excluding 370 Johns Road would retain a materially greater Rural Urban Fringe buffer between the proposed industrial area and the nearby residential and rural-residential environment, including our property and neighbouring properties, and would reduce the extent to which industrial zoning advances toward that sensitive receiving environment. It would also remove industrial zoning from the closest residential interface, for the reasons at paragraphs 86 to 91.

13. If the Council nevertheless approves PPC24 in whole or in part, we seek amendments to the Outline Development Plan and the Johns Road area-specific provisions — including P1–P3, RD1–RD3, NC1–NC3, the building-setback and landscaped-area standards, and the corresponding matters of discretion, as finally renumbered — necessary to address the grounds in this submission and the evidence at the hearing. Without limiting that relief, the provisions should secure a safe and workable access and transport outcome that does not transfer turning or heavy-vehicle effects onto Clearwater Avenue, Gardiners Road or other constrained parts of the network; staging and key structuring elements that legally prohibit a development sequence assuming participation of 448 Johns Road unless unencumbered title or binding legal covenants are secured and executed prior to any site works; a 30 m durable buffer at the site border with 360 Johns Road, riparian planting, screening and maintenance obligations; a continuous natural green landscaped screening strip along the full Johns Road site frontage to a height that will screen buildings and industrial activity from view, and area-specific signage controls prohibiting illuminated, digital, moving and off-site advertising signage and limiting signage facing Johns Road and the rural and residential interfaces; appropriate controls on built form in terms of height, size and colour, noise, operating hours, lighting and air effects, including a daytime maximum noise level at the rural and residential interface and controls on sirens and tonal reversing alarms; construction-phase controls on dust, noise, vibration and heavy-vehicle activity; robust stormwater, groundwater, freshwater, ecological and infrastructure outcomes; and effective long-term monitoring and enforcement. We also seek such consequential or alternative relief within the scope of this submission as is necessary to address the concerns raised.

The nature of this submission

14. We are affected neighbours, not planning, engineering or hydrology experts, and we do not ask the Council to accept our opinion as expert evidence. This submission identifies the grounds on which we oppose PPC24, using the applicant's own documents, its experts and the

Council's requests for further information to explain why those grounds arise. Where we say a matter "has not been demonstrated", we mean it has not been demonstrated on the material presently supplied; the technical conclusions are for the appropriate experts and ultimately the decision-maker.

15. Our opposition rests on three connected propositions, each of which we say is established by the applicant's own material and the Council's own record.

16. The claimed need and significance case is not made out. The proposal is an admitted departure from the planned urban form, justified by a shortage of freehold lots in a self-defined local sub-market — not by any demonstrated shortage of industrial development capacity. The official capacity evidence, which the applicant accepts, records a substantial citywide surplus, and about 118 hectares of industrial land, including 126 freehold lots at Ryans Road in Harewood, has since been approved nearby.

17. A substantial part of the rezoning area cannot deliver what the application claims. 448 Johns Road (Sec 61 SO 460822), the block that physically joins the existing industry area to the rest of the PPC24 site, is owned by a person who does not want it rezoned. The application relies on that land to portray a "consolidated and connected" outcome as readily available, while its own rules let the land remain rural indefinitely and its lack of control over the parcel undermines the claimed timing, connectivity and deliverability.

18. This is a poor location for the use proposed — a single constrained State Highway access with significant congestion and road-safety issues, over an unconfined aquifer, beside a spring-fed freshwater system in a highly valued ecological, visitor and recreational setting, with multiple nearby residential communities and material unresolved questions about site suitability, servicing and environmental effects. Those are location constraints, not merely information gaps.

Why we oppose PPC24

19. Our opposition is, in part, personal. Our family has owned property at 5 Clearwater Avenue since the early 2000s and started to plan and build our home there about ten years ago, choosing the location deliberately and for the long term. This is not an ordinary urban fringe. Clearwater, the Groynes, Roto Kōhatu, Willowbank Wildlife Reserve, Styx Mill Reserve and the Ōtūkaikino waterways together form an unusual green-and-blue part of the city with lakes, streams, mature trees, bird song, wildlife, native reserves and trails, used and valued by people from across Christchurch.

20. PPC24 would change the character and direction of the environment within the immediate vicinity of our property permanently. It would rezone about 19 hectares of Rural Urban Fringe to Industrial General, bringing large buildings, yards, trucks, loading, lighting, signage, machinery and the ordinary noise and activity an industrial zone is intended to enable. We would find such close activity emotionally distressing and believe it would negatively impact our quality of life at home and ultimately our health. The applicant’s own landscape and visual assessment reaches the same view about exposure: it rates the dwellings at 360 Johns Road and 5 and 19 Clearwater Avenue as the most affected of the audiences it identifies, and does so without a viewpoint, a photograph, or a visit to any of them. We return to that below. It would also increase the level of danger we perceive we face navigating the surrounding roads,

particularly the Clearwater roundabout which we are required to use every time we enter or exit our property.

21. Our objection is not simply that we do not want industry near us; if that were all, we could accept that cities change. The larger point is that Christchurch's planning framework deliberately keeps this land outside the planned urban area, and the applicant itself accepts that the proposal is "clearly contrary" to the regional and district direction for urban growth. That framework is the product of considerable expertise, consultation and public money, and none of it identifies this site for industrial expansion.

22. A private plan change is a legitimate process, and plans should change when circumstances justify it — but the process is not an entitlement to rezoning. Having read the notified material, we cannot find a convincing answer to a simple question:

> *If the planning framework says this land should remain Rural Urban Fringe, outside the planned urban area, what is it about PPC24 that justifies overturning that outcome?*

23. There is substantial industrial capacity elsewhere, vacant leasehold industrial land on Johns Road, and major new freehold industrial developments approved nearby. The Rural Urban Fringe here is not "development land in waiting"; it already does a job — open separation between long established industry and the Clearwater–Groynes visitor, waterway and recreation environment.

Planning and strategic framework

24. The planning framework is the backbone of this submission: there is already a deliberate regional and city strategy for urban growth, and PPC24 asks the Council to depart from it — which requires a strong planning justification, not merely evidence that more industrial land would be commercially useful.

Statutory framework and the central planning issue

25. Several statutory requirements frame this plan-change decision. Under section 75(3) of the Resource Management Act 1991, the District Plan must give effect to relevant national policy statements and the Canterbury Regional Policy Statement. The applicant itself acknowledges that PPC24 is contrary to the directive Chapter 6 provisions that locate greenfield urban growth. The NPS-UD must also be given effect to. Policy 8 directs responsive decisions where plan changes would add significantly to development capacity and contribute to well-functioning urban environments, and clause 3.8 addresses whether such capacity is well connected along transport corridors. Policy 8 is therefore central to the applicant's justification for an unanticipated proposal outside the planned urban area. If those considerations are not demonstrated, the admitted Regional Policy Statement conflict remains a substantial planning obstacle; it is not answered simply by the fact that additional industrial land would be created.

26. Furthermore, under section 75(3)(a), the proposal must give effect to the full suite of relevant national instruments. This includes the National Policy Statement for Freshwater Management (NPS-FM) (and its associated National Environmental Standards) and the National Policy

Statement for Infrastructure (NPS-I). As set out in the dedicated sections below, we believe PPC24 fails to give effect to these instruments due to its unknown and possibly irreversible impacts on the freshwater network and its, in our view, incompatible integration with strategic transport infrastructure.

27. Section 32 also requires an evaluation of the extent to which the proposed objective is the most appropriate way to achieve the purpose of the Act and whether the provisions are the most appropriate way to achieve that objective, including consideration of benefits, costs, efficiency, effectiveness and the risk of acting or not acting where information is uncertain or insufficient. That matters here because the applicant's objective is location-specific additional freehold industrial supply. The evaluation therefore needs to do more than show that industrialisation of this particular site is feasible or commercially attractive. The risk of acting or not acting on uncertain or insufficient information under section 32(2)(c) is therefore relevant to whether the rezoning has been adequately justified. Where the material before the Council is insufficient to determine whether this land is suitable for the zoning requested, that uncertainty weighs against granting the zoning and may, to the extent lawfully available, support obtaining further information or an adjournment rather than leaving the issue entirely to later consenting.

28. Part 2 of the Act frames all of this. Section 5(2)(b) and (c) require that the life-supporting capacity of water and ecosystems be safeguarded and that adverse effects on the environment be avoided, remedied or mitigated. Section 6(a) makes the preservation of the natural character of wetlands and rivers, their margins and the land surrounding them, and their protection from inappropriate subdivision, use and development, a matter of national importance, and section 6(c) does the same for significant indigenous vegetation and significant habitats of indigenous fauna. Those provisions bear directly on the freshwater, wetland and groundwater grounds set out at paragraphs 67 to 82.

There is already a planned urban form, and the applicant concedes the conflict

29. Chapter 6 and Map A of the Canterbury Regional Policy Statement form a coordinated strategy to direct urban growth, integrate development with infrastructure, maintain rural character and amenity, and protect environmental values. The Christchurch District Plan implements that direction, and the 2024 Greater Christchurch Spatial Plan, adopted by all partner councils as their Future Development Strategy, points the same way — consolidation, blue-green networks, strategic infrastructure and careful management of outward growth. The applicant accepts the central spatial fact: its July 2026 report acknowledges that, because the site is outside the urban area, the proposal is "clearly contrary" to the Regional Policy Statement and District Plan policy seeking to avoid urban development outside that area, and is inconsistent with Chapter 6's anticipated result that existing urban and identified growth areas provide the location for new urban development.

Rural Urban Fringe is not development land in waiting

30. The District Plan's rural framework recognises more than productive pasture. Rural land contributes through openness, vegetation, visual separation, recreation, groundwater and flood-management functions, water bodies and conservation values. Showing that this land is not pristine or especially productive pasture does not answer the wider reason for retaining a

rural edge here, including its separation, environmental and groundwater-protection functions.

31. The industrial boundary to the west is presented as making PPC24 a logical extension. We see the opposite. That Johns Road industrial area has existed there for decades and is well contained. The Clearwater, Northwood and the surrounding rural-residential communities have developed and extended towards it over time consistent with a planning framework that leaves this rural edge in place. The presence of industry on one side of a boundary is not a reason for the boundary to keep moving. This is where north-west industrial expansion should stop.

Policy 8 is a conditional pathway, not an entitlement

32. Policy 8 is therefore a responsive-planning pathway, not an entitlement to rezoning; the question is whether its substantive considerations and the wider statutory framework justify the admitted departure from planned urban form. For the reasons that follow, we say they do not.

The claimed shortage and significance are not demonstrated

33. The significance case is numerically modest and depends almost entirely on how the "market" is drawn. On the applicant's own figures, the rezoning would enable about 53,550 m^2 of new industrial floorspace — around 2.4 years of supply for its selected north-west locality. The applicant's economist concedes that 2.4 years "may not be considered significant on a purely numerical basis," so the case rests heavily on context, specifically, the proposition that there are no vacant freehold industrial lots in the narrow applicant-defined "Harewood North" market.

34. There is some artificiality in the applicant's reliance on a tightly defined "Harewood North" market, an area drawn only for the applicant's land-market analysis. PPC24 site property addressing straddles Northwood and Harewood. More importantly, a shortage of vacant freehold lots in a tightly drawn local property market is not the same as a shortage of industrial development capacity for planning purposes, and tenure is a commercial choice, not a permanent environmental constraint. Long-term leasehold occupation is an established feature of the Johns Road / Harewood market. The application does not quantify how many likely users actually require freehold ownership, or how much capacity is available through leasing, redevelopment or more intensive use of existing industrial land. The narrowing is doing the work: define the problem as a shortage of freehold land in a small locality, and the chosen site becomes the answer.

35. The wider capacity evidence points the other way, and the applicant accepts it. The 2023 Greater Christchurch Business Development Capacity Assessment recorded a total zoned industrial supply of 778 hectares within the city, and a long-term land sufficiency, that is, a surplus, of about 544 hectares at a city-wide scale. It records that demand for industrial land is modelled to decrease over the long term due to global economic trends, and that as a result the total zoned supply of 778 hectares within the city is not expected to be fully utilised. The applicant's own section 32 report acknowledges that the latest capacity assessment "suggests that there is a significant surplus of industrial land within Christchurch, which is sufficient to meet projected demand for the next 30 years." Its answer is that the desirable,

accessible supply is more constrained than the assessment suggests — but that is an argument about tenure and location within an admitted surplus, not a demonstrated capacity shortfall.

36. That evidence also predates the 2026 fast-track approvals for the Ryans Road and Pound Road industrial developments — approximately 57.6 hectares at 104 Ryans Road, in Harewood, enabling 126 freehold industrial lots, and approximately 60.4 hectares north-west of Pound Road and east of Barters Road, both confirmed in early May 2026. Together that is about 118 hectares, more than six times the gross area of PPC24, and the Ryans Road land is freehold industrial land in the same suburb, and the same north-western part of the city that the applicant says is short of freehold supply. Their existence is clearly relevant to a claim that another 19 hectares must be added outside the planned urban area because of insufficient supply. The land market advice relied on for PPC24, including its 2025 update, predates both the change of the request from Industrial Heavy to Industrial General and those two significant approvals. The applicant's economist was nevertheless aware of at least one of them: the economic assessment records that other nearby vacant industrial-zoned land is the subject of a fast-track application, but sets it aside as better suited to high-value logistics near the airport than to the yard-based demand said to drive this proposal. That is a judgement about the likely type of occupier of that land, not a demonstration that the capacity does not exist.

37. The same caution applies to the headline economic benefits. The applicant's economist describes the employment and GDP impacts as gross and acknowledges that displacement has not been quantified. Where substantial alternative capacity exists, we would want to know what the net benefit attributable to PPC24 is, not the gross activity that could occur on the site.

38. There is also economic value on the other side of the ledger. The Clearwater–Groynes receiving environment supports an established visitor, recreation and tourism economy. We have identified no assessment of that economy, or of whether advancing the industrial edge toward it could negatively affect it, and we say it should be weighed alongside the gross economic activity the applicant says may occur on the rezoned land.

A substantial part of the rezoning area is not participating, and cannot deliver what the application claims

39. In its 17 December 2025 RFI response, the applicant confirmed that the owner of 448 Johns Road is not part of the request and is not interested in rezoning the land. The applicant nevertheless includes 448 Johns Road within PPC24 because, in its words, doing so "enable[s] a consolidated and connected urban form," and states that the property "will remain as is, until such time as the landowner chooses to give effect to the zoning." The final provisions give effect to that by expressly allowing Rural Urban Fringe activities to continue on Sec 61 SO 460822 (rule P3).

40. Sec 61 SO 460822 is 448 Johns Road. The application's other parcels are each tied to the participating properties (370, 390 and 432 Johns Road); 448 Johns Road (Sec 61) is the remaining parcel, and it is the block that physically adjoins the established industrial precinct and sits between it and the proposed access road. In other words, the very land the applicant relies on to make the extension "consolidated and connected" is the land it does not control and which its own rules allow to stay rural. If 448 Johns Road remains rural-residential, the

industrial extension is not connected to the existing industry at all — it is broken at the join. PPC24 also relies on 448 Johns Road to deliver a shared pathway, to retain a bund identified as visual mitigation and potentially use land for access requirements. The applicant should not be able to rely on an unwilling third party's land to perform key functions on which the plan-change assessment depends.

41. At the same time, the section 32 assessment describes the approximately 19-hectare site as "readily available for development" and able to be "developed comprehensively and in a timely manner" (paragraph 209). We find those propositions difficult to reconcile with a rule that lets a third of the area continue in rural use indefinitely, at the election of an owner who does not wish to industrialise.

42. There is also an evidential consequence to having more than a third of the proposed rezoning area unassessed. The Council's first RFI noted that the earlier geotechnical and contamination investigations did not cover 448 Johns Road, and the applicant confirmed that access was unavailable and that further investigation would be required later. This lack of access would certainly impede a comprehensive assessment of the effects of rezoning that land.

43. The legal ability to include another person's land in a plan change request is not the same as demonstrating that the resulting capacity is reasonably realisable, and deliverability, timing and consolidation are directly relevant to the applicant's Policy 8 case.

44. We say the decision makers should give materially less weight to claims of capacity, timing and consolidation that depend on land the applicant does not control, whose owner does not wish to industrialise, and which has not been investigated to the same standard as the rest of the site.

The section 32 alternatives are too site-focused and circular

45. The section 32 evaluation largely compares outcomes for the Johns Road land itself — retain Rural Urban Fringe; rezone to Industrial General with bespoke provisions; Industrial General with an open-space water-margin component; or another industrial zone. Those are site-specific alternatives once industrialising this land is treated as the problem to be solved. The prior question, whether the claimed need requires this Rural Urban Fringe land to be industrialised at all, is not adequately confronted. Without weighing the existing and approved capacity nearby, the established leasehold market and ongoing redevelopment of existing industrial land, the analysis risks becoming circular.

A well-functioning urban environment is more than being close to SH1 and the airport

46. Policy 8 also requires a contribution to a well-functioning urban environment, and clause 3.8 requires capacity that is well connected. That is a functional test, not a label that follows from being near a highway or the airport. PPC24 is close to SH1 and the airport but it is strongly road-dependent, with no public transport route serving the site, a single constrained State Highway access, an indicative stormwater solution, and a sensitive freshwater and tourism and recreational setting. Those matters, and the fact that a substantial property within the area is not participating, go directly to whether this is a well-connected, well-functioning place for unplanned additional industrial capacity.

National direction has changed since PPC24 was lodged

47. The National Policy Statement for Infrastructure 2025 came into force on 15 January 2026, after PPC24 was lodged, and by its own terms must be given effect to from that date. Under section 75(3)(a) of the Act, the District Plan must give effect to it, and it applies to this decision. Policy 10 requires decision-makers on planning instruments to manage the interface between existing and planned infrastructure and other activities so that the safe, efficient and effective operation, maintenance and upgrading of that infrastructure is not compromised by the adverse effects of other activities, and to engage with infrastructure providers to understand their existing and planned activities and their medium to long-term plans, and to support the strategic integration of infrastructure with land use activities. Policy 11 applies the general principle that primary responsibility for managing adverse effects rests with the new activity.

48. We say it has not been demonstrated that PPC24 gives effect to that National Policy Statement, and that the section 32 evaluation of it falls short. It approaches Policy 10 as a question of whether industrial activity is compatible with State Highway 1 and Christchurch International Airport, which is not the same question as whether the operation of that infrastructure would be compromised by the effects of the rezoning; it treats the relevant outcomes as already provided for by the existing District Plan; and it does not address the principle in Policy 11 that responsibility for managing adverse effects rests on the new activity rather than on the infrastructure provider or the public. Nor has it been shown that the transport and servicing infrastructure on which PPC24 depends is planned infrastructure within the meaning of that National Policy Statement. We will address the applicable objective and policies in evidence.

Planning conclusion

49. PPC24 is an admitted departure from the planned urban form, justified by an artificially narrow local-freehold-market proposition. Against the city-wide capacity surplus, the major new industrial approvals right nearby, the uncertain deliverability of the full rezoning area, the transport constraints and the sensitive environmental and wetland setting, we do not consider the applicant has demonstrated either sufficiently significant development capacity or a sufficient contribution to a well-functioning urban environment to justify overturning the current zoning and tolerating the ecological risk to the Ōtūkaikino catchment.

Transport and access

50. Transport is where the strategic problem becomes practical. This is not a greenfield estate with a purpose-built local network and route choices. It is a ~19-hectare industrial proposal with a single access directly onto a busy section of State Highway 1 flanked by two already-constrained roundabouts.

The existing network is already constrained

51. The applicant's Integrated Transport Assessment (ITA) describes Johns Road past the site as an 80 km/h State Highway carrying about 30,073 vehicles per day (a Mobile Road desktop estimate). It records existing capacity constraints at the Sawyers Arms Road roundabout and identifies Clearwater Avenue as a key intersection affected by the proposal. Over 2020–2024

plus available 2025 data, the ITA records 55 reported crashes on the section between Sawyers Arms and Clearwater — 39 at Sawyers Arms (including three serious-injury and six minor-injury crashes) and eight at Clearwater (including three minor-injury crashes). This is already a busy, constrained corridor that is not risk-free. We use the Clearwater roundabout daily and regularly have to judge gaps to enter or cross fast moving multi-lane traffic when exiting Clearwater Avenue. This is the sole entry/exit point for the entire Clearwater residential and business community.

52. Gardiners Road is also an important part of this constrained network and requires much greater scrutiny. QTP's own modelling shows it is not peripheral to PPC24: most site trips are expected to be to or from Christchurch via Gardiners Road, Sawyers Arms Road or SH1 further south, and when PPC24 increases delay on SH1 the model predicts some existing traffic will reroute onto the Gardiners / Sawyers Arms / Waimakariri corridor. The Council's first RFI specifically raised heavy vehicles reaching Gardiners Road after U-turning at Clearwater, and the applicant's own modelling includes those U-turn movements.

53. In response to Council's RFI, the applicant estimated that PPC24 alone could add up to 22 outbound vehicles per hour in the AM peak and 40 in the PM peak on Gardiners Road between Johns Road and Hussey Road, including approximately four and seven heavy vehicles respectively, and it did not support a heavy-vehicle routing restriction. We understand from Gardiners Road residents that some longer trucks already use Gardiners Road and Sawyers Arms Road as an alternative route because their length prevents them readily making the right-turn movement at the Johns Road/Sawyers Arms roundabout. We also understand PPC22 proposes a Residential New Neighbourhood zone change to allow approximately 230 new dwellings at the north-east corner of Styx Mill and Gardiners Roads. The combined effect of existing heavy-vehicle use, PPC24 industrial traffic, congestion-driven rerouting and substantial additional residential growth therefore needs to be assessed cumulatively, including effects on capacity, road safety, residential amenity and the function of Gardiners Road, rather than treating each source of additional traffic in isolation.

The single access makes the Clearwater and Sawyers Arms roundabouts part of the site's access system

54. PPC24 proposes a single connection to Johns Road between 432 and 448 Johns Road, operating left-in / left-out, with all other site accesses closed. That has an unavoidable consequence: all outbound traffic is compelled to use the Clearwater roundabout — passing through it to travel north, or U-turning there to travel south-west turning off down Gardiners Road or toward Sawyers Arms, the airport or the western industrial network. Traffic approaching from the north-east cannot turn right into the site and must continue to Sawyers Arms to U-turn or route through the Greywacke Road industrial network. Turning movements a normal two-way access would absorb are displaced onto two already-congested roundabouts.

55. The restricted left-in / left-out arrangement also creates an inherent vehicle-kilometre penalty across the life of an industrial development. Those additional kilometres suffered by site vehicles, either on leaving or returning to site as they are forced to execute U-turns at roundabouts then double back, may be material in terms of network efficiency, fuel or energy

use and greenhouse-gas emissions. The scale of that effect should be assessed, and quantified to the extent material and practicable in the transport and planning evidence.

56. NZTA raised the same concern, on the current scheme. Its recorded feedback states that the left-in / left-out sole access "would greatly intensify the traffic generation on the highway network" and "would also rely on the roundabout at Clearwater Ave which is not designed for heavy vehicles to use to turn around." The applicant answers this with vehicle-tracking said to show a semi-trailer completing the U-turn at 10 km/h — but that same tracking records the movement "marginally encroach[ing] the outside circulating lane and/or … touch[ing] the mountable kerb." In our view that tends to confirm NZTA's concern rather than dispel it.

Road safety requires separate expert scrutiny

57. The Clearwater roundabout is already very difficult to enter at times from Clearwater Avenue. Vehicles approaching the roundabout up Clearwater Avenue are warned by signage “Beware Busy Intersection”. The roundabout serves not only local residents and commuters but also visitors travelling to Clearwater Golf Club, the Sir Bob Charles Golf Centre (Heller Golf), Peppers Clearwater and The Groynes. From our daily use, the concern is straightforward and observational: vehicles approach from the west in an 80 km/h environment, some appear to slow very late before the roundabout, and others pass through the roundabout at speed. At busy periods each driver in the Clearwater Avenue queue must wait for a usable gap across the two approaches before entering to turn right, or a gap in the outside lane approach to turn left. Regular Clearwater roundabout users returning into Clearwater Avenue from the north will often deliberately slow right down as they pass across the northbound Johns Road traffic, to allow drivers waiting to exit extra time to make the dash across the lanes.

58. At Clearwater, therefore, the issue is not only average delay but the gaps available in the traffic streams. Drivers must exercise excellent, sometimes split-second, judgement each time to access those gaps in the fast-moving State Highway traffic. PPC24 would add site traffic passing through and, importantly, slow U-turning movements at that same roundabout, potentially causing traffic to back up and alter or reduce usable gaps. The applicant's own RFI response notes that vehicles on both Johns Road lanes must yield to a U-turning vehicle already in the roundabout in the same way as they would to a vehicle turning right out of Clearwater Avenue; its heavy-vehicle tracking also acknowledges that the U-turn may marginally encroach into the outside circulating lane and/or touch the mountable kerb. In our submission, that interaction warrants specific road-safety scrutiny, not only network-average delay outputs.

59. The Clearwater roundabout is also an important crossing point for pedestrians and cyclists using the Clearwater roundabout crossing facilities to cross Johns Road and connect with the wider path network, including routes toward Clearwater and the Groynes. Those users must negotiate the State Highway approaches and crossing points in an already busy Clearwater roundabout environment. PPC24 would introduce additional traffic, including vehicles and heavy vehicles making U-turns through that same roundabout. The safety implications for pedestrians and cyclists using those crossing facilities are not answered by average-delay modelling and require separate consideration as part of the overall road-safety assessment.

60. The ITA itself identifies a separate merge/diverge issue near the proposed PPC24 site access. The existing Greywacke Road acceleration lane ends about 400 metres southwest of the

proposed intersection, but its 280-metre merge taper terminates only about 120 metres from the proposed access. The ITA says the new deceleration lane must be designed around that existing taper and that, if the two cannot be separated, signs and markings may be needed to manage conflicting merge and diverge movements. On an 80 km/h State Highway, particularly where heavy vehicles, often fully loaded, may be accelerating from Greywacke Road while other vehicles, also loaded, are slowing to merge and enter PPC24, we consider this a material safety matter requiring proper expert assessment.

61. We raise road safety broadly, including but not limited to the Clearwater right-turn/U-turn interaction, heavy-vehicle tracking and lane use, gap acceptance, speed limits, crash risk, sight distance, merge/diverge and weaving effects, acceleration and deceleration distances, pedestrian and cyclist safety, crossing facilities and active-mode connectivity, including interaction with U-turning and heavy vehicles, cumulative traffic, and the safety of the proposed or any amended access design.

The modelling does not remove the underlying access problem

62. We also say the transport modelling relied on is not adequate to support the rezoning. The original Integrated Transport Assessment was prepared for the earlier Industrial *Heavy* zoning and was not rebuilt when the request changed to Industrial General. More fundamentally, whatever an updated model produced, it would not alter the access arrangement described above: the site would still have one left-in / left-out access, still rely on Clearwater for outbound traffic that must reverse direction, and still rely on Sawyers Arms for inbound traffic from the north-east. The site access depends on intersections whose performance is already constrained and sensitive, and we say the safety and operational effects of adding this unplanned industrial demand require proper testing by transport experts.

63. The applicant's own modelling shows why that testing matters. QTP's CAST modelling estimates that at the Clearwater roundabout in the PM peak, delay on the State Highway 1 northbound approach would rise from 34 to 52 seconds and the approach would reach 100% saturation. Its SIDRA cross-check produces materially different results at the same roundabout — about 83% saturation, and negligible additional delay to State Highway 1 traffic. QTP expressly notes that relatively small differences in estimated capacity can produce large differences in modelled delay where an intersection is approaching or at capacity. At Sawyers Arms, both models identify significant approach-level delay effects, with SIDRA predicting larger increases on some approaches than CAST. We do not ask the Council to choose between those models. The divergence is itself the point: the intersections on which this rezoning depends are operating in the range where modelled performance becomes unstable, and that is the range in which the safety and operational effects of unplanned additional industrial demand most need expert testing.

Weak public transport, and what that means

64. The ITA records no public transport route serving the site; the nearest is 500–600 metres away in a direct line but around 1.5 km on foot via the already busy Clearwater crossing facilities. That bears directly on Policy 1(c) of the NPS-UD, which requires good accessibility between housing, jobs, community services, natural spaces and open spaces, including by way of public or active transport. Shared-path connections are proposed, but part of that network depends on 448 Johns Road, land the applicant has confirmed is not part of the request and

whose owner it says is not interested in rezoning, so those connections cannot be assumed. The location remains strongly dependent on cars, vans and trucks.

65. The transport conclusion is therefore a planning conclusion: a single access dependent on two constrained roundabouts, additional heavy traffic on a residential collector, wider neighbourhood network congestion, and weak active and public transport connectivity are not merely matters to be sorted later. They are the physical access structure of the site location, and they indicate this is not a natural place to insert an unplanned industrial estate — which bears directly on the clause 3.8 "well connected" test.

66. Our transport ground is not limited to the particular examples above; it includes safety, efficiency, congestion, speed limits, network operation, routing, heavy-vehicle impacts, cumulative growth, latent future capacity of existing vacant industrial land on Johns Road, and the adequacy of the proposed or any amended access strategy.

Ecology, water, stormwater, groundwater and infrastructure

67. Is industrialising this particular parcel of Rural Urban Fringe land a sensible land-use choice given the highly valued, sensitive receiving environment and the information presently available? Our concern is not that every detail must be known now; it is that the fundamental focus should be whether this land is suitable to rezone in the first place, not merely on how a subdivision would later be designed.

Hedges Waterway is a connected spring-fed system, and a wetland is now confirmed

68. Hedges Waterway runs along the northern part of the site and is a tributary of the Ōtūkaikino system, which is identified as a Site of Ecological Significance in the District Plan. The applicant's own freshwater assessment describes Hedges Waterway as a spring-fed watercourse with high ecological values. It identifies mapped Canterbury galaxias spawning habitat approximately 140 metres downstream and the Groynes approximately one kilometre downstream, with further connection to the Waimakariri River. PPC24 would place extensive hardstand, roads, buildings, lighting and stormwater activity immediately beside that connected waterway system. The risk of industrial spills, accidents and unforeseen events is real and must be considered.

69. The ecology work also changed materially through the RFI process. An earlier assessment identified possible wetland areas; Stantec then surveyed accessible parts of the site and confirmed natural inland wetland vegetation on the riparian margin of Hedges Waterway, now mapped with proposed setbacks and planting. That sequence matters: further investigation on this site has already turned a potential constraint into a confirmed one.

70. The confirmed natural inland wetland also engages national freshwater direction. The National Policy Statement for Freshwater Management 2020, in its current form, includes Te Mana o te Wai as a fundamental concept and Policy 6 provides that there is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted. The National Environmental Standards for Freshwater and the Canterbury Land and Water Regional Plan, with which the District Plan must not be inconsistent, contain specific controls and consenting pathways for activities in and around natural inland wetlands. This confirmed

wetland is a substantive planning constraint, not simply a feature to be left to detailed design after rezoning.

71. This zoning decision also matters now for the future protection of this waterway and is therefore not environmentally neutral. Under clause 3.22(1)(c) of the NPS-FM, the urban development exception to the wetland policy is available only where, among other things, the activity occurs on land identified for urban development in operative plan provisions and does not occur on land zoned as general rural, rural production or rural lifestyle. On its current Rural Urban Fringe zoning the site does not meet those descriptions. That is a matter for planning and ecological evidence, but it illustrates why the wetland cannot be treated as a detail for later consenting: the rezoning decision is the step that changes the protection.

The site sits above an unconfined aquifer

72. The applicant acknowledges that the site is affected by the Christchurch Groundwater Protection Zone, and Council has expressly identified the area as one of unconfined aquifers. The operative regional planning framework imposes particular controls on industrial stormwater discharges to ground in recognition of groundwater contamination risk. The District Plan itself recognises the issue: Policy 16.2.3.2 provides that the quantity of wastewater discharged in areas over unconfined or semi-confined aquifers is restricted to minimise any risk of contamination. Against that background, the applicant's conclusion that the groundwater protection zone will not be adversely affected can only be seen as premature when seasonal groundwater levels have not yet been established and the final stormwater treatment and disposal solution remains unresolved, as noted at paragraphs 73 to 75.

Key parts of the freshwater setting have not been field-verified — including on 448 Johns Road

73. The May 2026 wetland delineation expressly covered only areas for which landowner permission was available, and its project area did not encompass the full plan-change extent. Because access to 448 Johns Road was unavailable, more than a third of the rezoning area has not been subject to the same on-site wetland and ecological assessment as the participating land. Separately, the Council repeatedly asked the applicant to identify and map spring heads within Hedges Waterway, noting in January 2026 that ownership constraints did not entirely preclude this. Stantec's May 2026 response confirms a large area of likely upwelling and spring presence in the headwaters but states that detailed field access was unavailable, relying on the springs being up-gradient to conclude that effects are not expected. That leaves an important part of the freshwater setting identified in principle but not mapped or field-verified before the Council is asked to create the zoning.

Seasonal groundwater remains a material uncertainty

74. Groundwater matters because the stormwater strategy relies significantly on treatment and infiltration to ground. PDP records onsite groundwater at roughly 2.05–3.8 m below ground from four bores, but those were single measurements taken at drilling; there is no onsite data confirming seasonal variation and no long-term monitoring bore nearby. PDP notes levels are likely higher in winter, recommends installing bores and establishing a seasonal range, and identifies that groundwater mounding near soakage facilities could locally alter shallow flow toward Hedges Waterway. Its conclusion is that the site is potentially suitable, while

recognising that some areas may have winter levels not ideal for infiltration. The Council's second RFI sought bores and a monitoring programme before the hearing, saying that without them it would be difficult to confirm suitability and stormwater disposal through winter and large rainfall events. The notified application does not resolve that with seasonal site-specific data.

The stormwater solution is still indicative

75. The stormwater management area remains indicative as to type, size and location. The feasible stormwater solution materially affects the amount and location of developable land, the relationship with Hedges Waterway and the wetland, groundwater mounding, treatment of contaminants, bird-strike risk given the proximity of Christchurch International Airport, and the effectiveness of the ecological buffer. That is why it matters at zoning stage — not so the Council designs the system now, but because the feasible footprint bears on whether this is sensible land to industrialise and on whether the realisable capacity is sufficient to justify the departure sought.

76. A rule requiring the stormwater area to be proven before development was proposed, and then removed. In December 2025 the applicant proposed an additional standard providing that subdivision or industrial development shall not occur until detailed design and investigation demonstrated that the indicative stormwater management area is capable of servicing the industrial development, with non-compliance a discretionary activity. It explained that the rule ensured this work was undertaken prior to subdivision or development on the site, so that development did not commence in an area that may ultimately be required for stormwater management. In July 2026 the applicant confirmed that the omission of that rule was deliberate, on the basis that it was not considered enforceable because there was no trigger for when the detailed design and investigation would be undertaken. Nothing has replaced it. The stormwater management area remains indicative as to size and location, and the applicant's own reason for proposing the rule is unanswered.

Infrastructure and flooding require integrated consideration

77. Infrastructure, servicing and flooding require integrated consideration. The application's wastewater, water supply, firefighting and flood material has developed through the RFI process. The wastewater modelling identifies localised surcharge in parts of Haddon Lane and Gardiners Road under its cumulative worst-case scenario, and recommends targeted monitoring and periodic reassessment as catchment growth occurs. It also expressly limits its model to the gravity network upstream of PS0029, leaving the downstream network beyond the pump station outside its scope. We say that the combined servicing, flood, groundwater and stormwater evidence must be sufficient to support a permanent zoning decision, and that it directly affects the developable footprint and the ability to integrate well with infrastructure, on which the Policy 8 and section 32 case relies.

Terrestrial ecology and biodiversity effects remain relevant

78. The freshwater assessment expressly excluded terrestrial ecology and recommended further work. The Council later sought assessment of vegetation, herpetofauna and avifauna and, in June 2026, considered the landscape vegetation memo insufficient to determine whether threatened or at-risk species were present. The applicant may provide further evidence before

the hearing. Our ground is broader than that present gap: conversion of the site from rural to industrial may affect terrestrial ecology, including protected fauna, and the adequacy of avoidance, mitigation and long-term management should be tested by appropriately qualified experts.

Riparian restoration is a benefit only if it is durable

79. The proposed riparian and buffer planting is an improvement over standard industrial provisions, but the applicant's ecologist qualifies its ecological benefit on the planting being appropriately established and managed. Parts of those areas would remain privately owned and zoned Industrial General, with future lot owners responsible for maintenance as ownership and priorities change over decades. We say the durability of that mitigation is a matter for evidence.

Cultural values and consultation form part of the freshwater setting

80. The applicant's own section 32 recognises the Mahaanui Iwi Management Plan, which the Council must take into account under section 74(2A) of the Resource Management Act, and records consultation with Whitiora for Te Ngāi Tūāhuriri and with Mahaanui Kurataiao Ltd. Its December 2025 RFI response stated that no further response had then been received from Whitiora. The same section 32 assessment identifies nighttime darkness and discharges to air as matters in the Iwi Management Plan and acknowledges that the plan change proposes no specific controls on those matters, with some light pollution potentially conflicting with the Plan's aspirations. The District Plan also directs, through Policy 16.2.3.1, that development in greenfield areas recognise and support Ngāi Tahu cultural values, including recognition of waterways, springs and wetlands of Ngāi Tahu cultural significance. Given Hedges Waterway's connection to the Ōtūkaikino system, we consider the final decision should record the outcome of mana whenua consultation and address any cultural values or recommendations that emerge. We do not purport to speak for mana whenua.

Environmental conclusion

81. PPC24 would replace a permeable rural edge with an intensive industrial precinct right beside a valued spring-fed waterway that feeds into a Site of Ecological Significance, on top of an unconfined aquifer, with a confirmed natural inland wetland, over shallow and seasonally variable groundwater, while important groundwater, stormwater, terrestrial ecology and infrastructure matters remain unresolved or dependent on later design and management. These are critical characteristics of a parcel of land which, absent a compelling capacity or market justification, are reasons to leave this land Rural Urban Fringe rather than constraints to engineer around.

82. Our environmental and servicing grounds are not confined to the present state of the applicant's investigations. They include site suitability and the nature, scale and cumulative effects of industrialisation on freshwater, groundwater, stormwater, wetlands, springs and terrestrial ecology; infrastructure and flood interactions; cultural values associated with the freshwater setting; and the adequacy and durability of any avoidance, mitigation, monitoring and management measures ultimately advanced.

Amenity, landscape, character and operational effects

An unusually valuable rural-green-blue edge for Christchurch

83. The site sits at the transition between the long-established Johns Road industrial area and the wider Clearwater–Groynes–Ōtūkaikino rural and recreational environment. It is not pristine and it fronts a State Highway, but its open paddocks, trees and waterways still read as part of that transition — and that remaining separation matters precisely because the context is mixed. People using nearby tracks and waterways move through this landscape; the quality of that experience depends on openness, vegetation, water and the sense of transition away from urban-industrial activity.

This is an established visitor accommodation and tourism district

84. The receiving environment is used by more than just the people who live here: the golf clubs, resort, reserves, walkways and trails identified at paragraphs 19 and 38 make this an established visitor and recreation destination as well as a residential one. That matters to the zoning decision. PPC24 would not simply create a new industrial interface with the many nearby houses; it would move the industrial edge toward a high value visitor and recreation precinct whose character and attraction depend on that open, green and water-based setting. The existing visitor use and visitor economy are part of the receiving environment and should be recognised when the effects and benefits of moving the industrial boundary are assessed.

The change in character is not disputed — and planting does not replace separation

85. The applicant's own section 32 assessment identifies a change in character and amenity as a cost of their preferred option: larger buildings, yards, hardstand, loading, signage, lighting and machinery. The landscape response relies on setbacks, retained vegetation and buffer planting. Those measures can reduce visibility to some extent over time, but visibility is only one part of amenity — planting does not screen traffic, reversing alarms, lights above the canopy, signage or after-hours activity. We do not accept that a 10- or 20-metre planted strip can replace the function of ~19 hectares of open Rural Urban Fringe separation. As stated with the ecological buffer, much of the planted interface would remain privately owned within the IG framework, so its long-term quality cannot simply be assumed.

The closest residential interface

86. The closest residential interface is at the eastern end of the plan change area. 370 Johns Road is the north-easternmost of the parcels in the request, and it is the only part of the plan change area that adjoins 360 Johns Road, along its eastern boundary. 360 Johns Road is an irregular block: a long drive runs up from Johns Road to a dwelling on an upper terrace, and the land then falls some five to six metres beyond the house to a lower terrace and garden, through which a stream runs that we understand continues on from Hedges Waterway. The dwelling and the shared boundary sit at much the same level as the land to be rezoned, and that boundary passes within approximately three metres of the dwelling itself. There are established trees on both sides of the boundary fence. That property lies between the plan change area and the two Clearwater Avenue properties, including ours at number 5, so what happens at that boundary is the leading edge of the same advance that reaches us.

Location plan — Proposed Private Plan Change 24 (Johns Road) and adjoining properties

370 Johns Road — within PPC24 360 Johns Road 19 Clearwater Avenue 5 Clearwater Avenue



Parcel boundaries transcribed from Canterbury Maps property records and fitted to the base imagery; the fit between the two sources agrees to within approximately two metres. Indicative only — not to survey accuracy, and not to be relied on for measurement of boundary distances. Base imagery and attribution as shown. Prepared by the submitters, 27 August 2026.

87. The response to that interface in the notified provisions is a minimum building setback of 10 metres where a site shares a boundary with the Rural Urban Fringe Zone, and a 10 metre buffer planting strip shown along the eastern boundary on the Outline Development Plan, to be planted at one tree per 10 metres of shared boundary. Against a dwelling approximately three metres from that boundary, on ground at much the same level as the land to be rezoned, we say that is not an adequate response. There is no difference in ground level between the two to moderate the effect of built form at the setback limit, and because the land within 360 falls away beyond the house, buildings, lighting and yard activity at that setback would also be seen from below, across the lower terrace and garden. Nor do the provisions require the existing trees along that boundary to be retained: the only vegetation the rules protect is existing vegetation within 10 metres of the mapped wetland margin. The screening that stands there now could lawfully be removed and replaced with a strip planted at one tree per 10 metres.

88. Two features of the drafting compound that. A building that does not meet the setback is a restricted discretionary activity, and the standard expressly provides that any application arising from it shall not be publicly notified — so the owner of the adjoining dwelling would have no notice of, and no ability to participate in, an application to build closer than 10 metres to their house. And the corresponding matter of discretion is confined to the effect of reducing the setback on the visual amenity of the adjoining rural zone, which does not reach noise, lighting, dominance, privacy, hours of operation, or the effects of vehicle movements and yard activity.

89. The landscape and visual assessment does not test that interface. Its summary table lists eleven viewing audiences. Ten carry a viewpoint number, a marked position on the viewpoint location plan and a photograph. The row covering 360 Johns Road and 5 and 19 Clearwater Avenue carries none of those; its viewpoint reference is "N/A". It is the only audience in the table described as adjoining the site, it records a fixed and permanent residential view, and it is rated "low" — the highest rating given to any audience in the assessment. The nearest

dwellings are at once the most affected and the only ones not visited, photographed or located. The same assessment places those dwellings to the west of the site, where elsewhere it records that the site is bordered to the east by established rural properties within the Clearwater development. It then reasons that the houses are oriented north to south, so that their main outlooks fall within their own grounds and away from the site. That proposition is central to the rating and is untested: the May 2026 vegetation assessment records that the site visit was confined to publicly accessible areas, being road frontages and areas outside private property boundaries, with professional judgement applied where access was limited. The assessment also accepts that the screening it relies on is offsite mitigation — on land the plan change neither controls nor secures.

90. There is a wider point about those documents. The landscape and visual assessment and the urban design assessment both assess the rezoning of 370 to 470 Johns Road — five lots, including the Council stormwater basin — to Industrial Heavy. The notified plan change is four properties, 370 to 448, to Industrial General. The preliminary groundwater advice was likewise prepared on a 370 to 470 basis, over a larger site area. None of them was rebuilt when the request changed. That is the same difficulty we raise about the transport modelling at paragraph 62 and the land market advice at paragraph 36, and we say it recurs often enough to bear on the weight the section 32 evaluation can carry as a whole.

91. The Outline Development Plan also locates the stormwater management area at the north-eastern corner of the site — the part of the plan change area closest to the dwelling at 360 — immediately inside that boundary and separated from it only by the 10 metre planting strip, with its size and location expressly to be confirmed. It is now the only stormwater management area shown. The Council's first request for further information recorded that its stormwater engineers had advised that the basin at 470 Johns Road would not be available for use by the development and should be excluded from the plan change area and the Outline Development Plan, and the applicant excluded it. Whatever was originally contemplated, the whole of the stormwater function must now be accommodated in a facility that has not been sized or located. That is the same facility whose seasonal feasibility is unresolved for the reasons at paragraphs 74 and 75, which PDP records could locally alter shallow groundwater flow toward Hedges Waterway, and it sits close to the point at which the waterway leaves the site, on higher ground than the watercourse on the lower terrace at 360. The urban design assessment further relies on it to provide screening to the sensitive activities to the north-east, so a single element whose dimensions and position remain undetermined is carrying both the stormwater function and part of the amenity mitigation. Placing an indicative and unsized stormwater facility at the corner where the plan change area meets its nearest dwelling and its downstream neighbour is not, in our submission, a matter that can sensibly be left to subdivision design. Because 370 Johns Road is the only parcel adjoining this boundary, the alternative relief at paragraph 12 would remove industrial zoning from the interface altogether. If rezoning nevertheless proceeds, we seek the relief set out at paragraph 13, including a durable buffer at this boundary.

Noise, lighting and air effects are part of the receiving environment

92. The PPC24 area-specific rules do not add bespoke noise, operating-hour, lighting or air-discharge controls for the Johns Road interface. Standard District Plan and regional controls would continue to apply, but we do not accept that this is, without more, an adequate answer

where an industrial edge is being advanced toward residential communities, rural-residential properties, a golf-resort and visitor environment, and a spring-fed waterway. The applicant's own freshwater advice says lighting should be designed to face away from Hedges Waterway, and its section 32 discussion of the Mahaanui Iwi Management Plan acknowledges that no nighttime-lighting controls are proposed and that some light pollution may conflict with the Plan's aspirations.

93. We say the standard noise and lighting controls warrant specific scrutiny at this interface, and that they are less protective in practice than they appear. In particular, they do not adequately control the intermittent, short-duration and tonal noise that is actually heard on nearby residential properties, on a golf course, at a driving range, on a bike or while walking; the District Plan does not restrict the operating hours of industrial activities in the Industrial General Zone; and no curfew applies to lighting. We will address the applicable provisions, and the controls we say are required, in evidence. The relief we seek is set out at paragraph 13.

Construction disturbance is part of the effect

94. Effects would begin well before any business occupies the site. Building out roughly 19 hectares — earthworks, site preparation, stormwater works, internal roading and the State Highway access — would generate dust, noise, vibration and heavy-vehicle movements over what may be a long and staged period, affecting nearby residents and users of the surrounding recreation and visitor environment. Detailed construction management is properly a matter for later consenting; the likely scale and duration of the disturbance is not. It bears on whether this Rural Urban Fringe land should be industrialised at all and, if rezoning proceeds, should be controlled.

The Johns Road frontage and signage

95. The proposed area-specific standards require building setbacks and landscaping only where a site adjoins the Rural Urban Fringe or Rural Waimakariri Zone, or Hedges Waterway. Nothing is proposed for the Johns Road frontage itself, and no area-specific signage control is proposed for it. That frontage is the face the site would present to the State Highway, to the residential properties on its southern side, and to everyone travelling to The Groynes, Clearwater, Northwood and the airport, and Johns Road at this point is a major northern gateway to Christchurch. We say the standard rules are not an adequate response at this location, and that leaving this interface to them is difficult to reconcile with the District Plan policies on which the applicant's own landscape assessment relies. We will address the applicable provisions, and the controls we say are required, in evidence.

96. If rezoning proceeds, we therefore seek the Johns Road frontage landscaping and area-specific signage controls identified in paragraph 13, including continuous natural green border to a height that screens the industrial buildings and activities in full along the full frontage and restrictions on illuminated, digital, moving and off-site advertising.

The direction of industrial expansion matters

97. The overarching amenity concern is one of direction. Industry has long existed on Johns Road; the present Rural Urban Fringe boundary marks its edge. PPC24 would move that edge toward residential, recreation, visitor and freshwater environments, and once a new edge is set the

next proposal describes itself as another logical extension. In our submission, absent a compelling planning justification, the existing strategic boundary should remain.

Reservation of grounds and evidence

98. We recognise that evidence will continue to be refined through submissions, expert evidence and the hearing. Our core grounds are the strategic planning conflict; lack of demonstrated need and significance; uncertain deliverability of the full rezoning area; transport and road safety; infrastructure and servicing; freshwater, groundwater, stormwater, wetland and ecological effects; cultural values; construction-phase effects; and amenity and operational effects.

99. The present record still matters to the weight of the applicant's case, particularly where significance, connectivity, site suitability or mitigation ask decision makers to rely on assumptions, indicative designs or later work.

100. Where further material is produced, we intend, where appropriate, to test it and to rely on expert evidence on the matters raised in this submission. The examples, figures and documents cited do not confine those grounds, which apply to the notified proposal and to any amended access design, Outline Development Plan, provisions, staging or mitigation advanced through the hearing process.

Conclusion and relief sought

101. After working through the planning documents and the applicant's technical material, we return to the same conclusion: PPC24 seeks to solve a need that has not been demonstrated. The wider capacity evidence, which the applicant accepts, identifies a substantial city-wide surplus, major new industrial projects have been approved nearby, one in the same suburb, and, for the reasons at paragraphs 39 to 44, even the full rezoning area is not a single, controlled, deliverable development parcel. The justification offered for departing from the planned urban form is not sufficient and such a move represents significant ecological risk both now and into the future.

102. The location constraints are very real. The land is outside the planned urban area and zoned Rural Urban Fringe, maintaining real open separation between long-established industry and the valued Clearwater–Groynes visitor, waterway and recreation environment. PPC24 would rely on a single constrained State Highway access and on two already-constrained roundabouts with identified road-safety issues at Clearwater and near the proposed access, and would replace permeable rural land over an unconfined aquifer and beside a confirmed natural inland wetland and valued spring-fed waterway feeding into a Site of Ecological Significance, with an industrial precinct whose stormwater, ecological, infrastructure and amenity outcomes depend in important respects on detailed design, ongoing management and future consenting. Those are not merely engineering problems to be worked around — they are part of the reason the current planning boundary makes sense.

103. Our primary position is that the underlying land-use direction of PPC24 is wrong and that mitigation does not cure that strategic objection. If the Council does not decline the request, our secondary and alternative relief is the relief set out at paragraphs 11 to 13. It is intended to

preserve a workable outcome and address the grounds raised here, not to concede that later information or mitigation resolves the strategic objection.

104. **Accordingly, our primary relief remains that PPC24 be declined in its entirety, and that the land retain its Rural Urban Fringe zoning.**

End.

Key sources relied on

- PPC24 Request and Section 32 Report (July 2026), including the NPS-UD / Policy 8 assessment, economics, alternatives and paragraph 209 ("readily available … comprehensively and in a timely manner").
- Applicant RFI response, 17 December 2025 (448 Johns Road / Sec 61 SO 460822 not participating; "consolidated and connected urban form"; rule P3 continuing RUF activities); RFI response, May 2026; RFI response, July 2026.
- Christchurch City Council RFIs (23 September 2025; 23 January 2026) and ecology follow-up (15 June 2026); Council correspondence confirming the 448 owner is not participating and noting the assessment implications of unavailable access.
- Amended Outline Development Plan (July 2026), including the sole access, buffer/riparian areas and indicative stormwater area.
- Appendix D — Landscape, Visual and Urban Design Assessment, and RFI responses D(i) (October 2025) and D(ii) (May 2026).
- Appendix H — Economic Assessment (27 February 2026), including the 53,550 m^2 / 2.4-years figure, the 30-year-surplus acknowledgement, headline impacts and the gross-impacts / unquantified-displacement limitation.
- Appendix I and Appendix I(i) — Land Market Demand and the 2025 Update, including the "Harewood North" definition and the freehold-lot analysis.
- Appendix J — Provisions Assessment (NPS-UD, CRPS Chapter 6 / Map A, District Plan).
- Appendix G — Integrated Transport Assessment, including the proposed site access, and RFI responses (G(i), 20 October 2025, including NZTA feedback; G(ii) IH-to-IG memo, 9 March 2026).
- QTP Ltd — Proposed Private Plan Change – Traffic Network Effects Modelling Technical Report, including the 2038 network-effects assessment.
- Appendix E / E(i) — Freshwater and Aquatic Ecology (Stantec RFI response and wetland/spring assessment, 7 May 2026).
- Appendix K — PDP preliminary groundwater investigations.
- Appendices F, F(ii) and F(iii) — infrastructure and wastewater assessments, including the July 2026 wastewater modelling; Appendix A — flooding assessment.

- Resource Management Act 1991, especially Part 2 (sections 5, 6 and 7) and sections 32, 74(2A) and 75(3); National Policy Statement on Urban Development 2020, especially Policies 1 and 8 and clauses 3.8 and 3.17.
- National Policy Statement for Infrastructure 2025, especially the objective and Policies 10 and 11.
- National Policy Statement for Freshwater Management 2020 (current consolidated version), especially Policy 6 and clauses 3.5 and 3.22, and the Resource Management (National Environmental Standards for Freshwater) Regulations 2020, including the natural inland wetland provisions.
- Mahaanui Iwi Management Plan 2013 and the applicant's consultation / RFI material concerning Te Ngāi Tūāhuriri and cultural values.
- Christchurch District Plan, especially Chapter 6 (including Noise, Outdoor Lighting and Signs) and Chapter 16, including its industrial zone policies and rules.
- Canterbury Regional Policy Statement (operative), especially Chapter 6 and Map A; Greater Christchurch Business Development Capacity Assessment (2023); Greater Christchurch Spatial Plan / Future Development Strategy (2024); and the May 2026 Ryans Road and Pound Road fast-track industrial approvals.
- Canterbury Land and Water Regional Plan — Wetlands protection, Christchurch Groundwater Protection Zone and provisions relating to groundwater, stormwater discharges to land and unconfined aquifers.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 27/08/2026

First name: Allan & Lynette **Last name:** Turnbull

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

Please refer to the submission from Michael Sharpe representing C.R.O.S (Clearwater Resort Owners Society Incorporated)

We have been full time residents of Clearwater Resort since 2012. We came as Earthquake refugees but quickly appreciated the therapeutic affect of living in the tranquil semirural environment adjoining waterways and nature reserve which Clearwater Resort offers residents visitors Golfers and tourists alike

As residents in close proximity to the specified land (370-448 JohnsRd) we ratify all points made in the CROS Submission by Michael Sharpe opposing the application to change the land use from Rural Urban Fringe to an Industrial General Zone and for a Development Plan for that zone to be inserted into the District Plan.

iTo be within sight of and potentially smell and breathe the effects of a heavy industrial operation would destroy he environment that has been created and maintained with nature being at the centre of it

We strongly oppose all proposed changes

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Please refer to the CROS Submission

The reasons for my / our submission are: (use additional pages if required)

40

Please refer to the CROS Submission. It outlines in detail why this application should be declined in its entirety

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

We wish the application to be declined not amended in any form

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Michael **Last name:** Sharp

On behalf of: Clearwater Golf Club Limited

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

see the attached submission

The reasons for my / our submission are: (use additional pages if required)

see the attached submission

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

see the attached submission

Attached Documents

Name
Submission on PPC24 - Clearwater Golf Club Ltd (Signed)

T24Consult Page 136 of 212

Christchurch City Council

Submission on a Publicly Notified Plan Change to the Christchurch District Plan

Resource Management Act 1991 – Form 5

Email to: PlanChange@ccc.govt.nz ; or
Deliver to: Ground floor reception, Christchurch City Council, 53 Hereford Street, Christchurch Attn: City Planning Team; or
Send to: City Planning Team, Christchurch City Council, PO Box 73012, Christchurch, 8154

For enquiries phone: (03) 941 8999

1. I wish to make a submission on:

Plan change name & number: 24. 370 - 448 Johns Road, Russley

2. Submitter details

Full name of submitter: Clearwater Golf Club Limited

Street address: 40A Clearwater Avenue, Northwood, Christchurch 8051

Postal Address (if different): PO Box 14069, Christchurch Airport, Christchurch

Contact phone number (daytime): (03) 360 2146 Postcode: 8544

Email: michael@clearwatergolf.co.nz

My address for service for receiving documents and communication about this plan change is: ☑ By email ☐ By post

3. Submission details

I / We:
- ☐ Support all or part of the plan change
- ☑ Oppose all or part of the plan change
- ☐ Am neutral towards the plan change

The specific provisions of the plan change that my / our submission relates to are: *(give details, using additional pages if required)*

See the attached submission.

The reasons for my / our submission are: *(use additional pages if required)*

See the attached submission.

The decision I / we would like the Council to make is: *(give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of any conditions sought. Use additional pages if required)*

See the attached submission.

T24Consult Page 137 of 212

4. Trade competition

I / We: ☐ **could** / ☑ **could not** gain an advantage in trade competition through this submission.

If you are a person who could gain advantage in trade competition through this submission, are you directly affected by and effect of the proposed plan charge/part of the plan change that –

a) adversely affects the environment, and

b) does not relate to the trade competition or the effects of trade competition?

☐ Yes ☐ No

5. Hearing of this plan change

If a hearing is held, I / we:

☑ **Wish to** speak in support of my / our submission

☐ **Do not wish to** speak in support of my / our submission

☐ If others make a similar submission I / we will consider presenting a joint case with them at the hearing

Please note that a hearing will only be held if any of the submitters wish to be heard, but all submissions will be taken into consideration regardless.

If you change your mind about whether you wish to speak at the hearing, please contact the Council by telephone on 941 8999 or by email at PlanChange@ccc.govt.nz.

6. Signature (of submitter(s) or person authorised to sign on behalf of submitter(s)

Signature:		Date:	27. 8. 26.
Signature:		Date:	

Note: A signature is not required if you make your submission electronically

Important information

1. The Council must receive your submission before the closing date and time for submissions on this plan change.
2. If you are a trade competitor, your right to make a submission may be limited by the provisions in Part 11A of the RMA.
3. The Council may strike out a submission (or part of it) in the following situations:
   - It is frivolous or vexatious
   - It discloses no reasonable or relevant case
   - It would be an abuse of the hearing process to allow it to be taken further
   - It contains offensive language
   - It is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matters.

Privacy information

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker).

Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this plan change prior to making your submission.

Office use only

Received at the ..... Office on ..... at ..... am / pm

SUBMISSION AND OBJECTION

IN RESPECT OF PROPOSED PRIVATE PLAN CHANGE 24 — JOHNS ROAD

370–448 Johns Road, Russley, Christchurch (JRCD Limited)

To:
The Chief Executive
Christchurch City Council
PO Box 73015
Christchurch 8154

From:
Michael Sharp
General Manager
Clearwater Golf Club Limited

Re:
Proposed change to the Christchurch District Plan requested by JRCD Limited ("applicant") under Clause 21 of Schedule 1 to the Resource Management Act 1991 — rezoning of 370, 390, 432 and 448 Johns Road from Rural Urban Fringe to Industrial General, together with an associated Outline Development Plan and area-specific rules ("the Plan Change").

Introduction and Submitter's Interest

1. This submission is made on behalf of Clearwater Golf Club Limited ("the submitter"). The submitter objects to the Plan Change in its entirety, and to each of its constituent provisions, for the reasons set out below.

2. Clearwater Golf Club has 600 members and is located at Clearwater Resort, 38 Clearwater 38 Clearwater Avenue, Northwood, Christchurch 8051. It is projected that 32,000 rounds of golf will be played at Clearwater during the year ended 31 December 2026 – of which 23,000 will be member rounds; and 9,000 will be visitor rounds.

3. The submitter's affairs are managed by a Board of Directors that is elected by Clearwater Golf Club's members. The Directors approved this submission on 21 August 2026. It is likely that members of the golf club will prepare individual submissions in support of this submission.

4. The submitter is not in a position to gain an advantage in trade competition through this submission.

5. The applicant has undertaken no consultation with the submitter on the proposed Plan Change.

6. The location of Clearwater Resort in relation to the applicant's land is highlighted in the image below.



7. The submitter has a direct interest in the Plan Change as the operator of Clearwater Golf Club, whose members, visitors and guests rely on the existing rural and open space character and ecological amenity of the surrounding area including the Groynes, Isaac Conservation Park, Waimakariri River Regional Park, and Lake Roto Kohatu.

8. The submitter's interests span recreation, tourism and hospitality, and landholding, and are directly and materially affected by the traffic, noise, ecological, lighting, visual, air quality and reverse sensitivity effects addressed in this submission. All are activities lawfully established well in advance of the Plan Change request.

9. This submission is structured by topic, addressing ecology and waterways, stormwater management, services, traffic and transportation, noise, lighting and night sky, visual and landscape effects, air quality and dust, reverse sensitivity, loss of open space and rural-urban character, and the economic case advanced in support of the Plan Change.

10. The submitter reserves the right to supplement this submission with independent expert evidence, including acoustic, traffic engineering, ecological, and landscape evidence, and requests the opportunity to be heard further in support of the matters raised.

    If others make a similar submission, the submitter will consider presenting a joint case with them at a hearing.

Statutory Framework

11. This submission is made having regard to the framework applicable to a private plan change request under Part 2 of Schedule 1 to the Resource Management Act 1991, including the Council's discretion to accept, adopt or reject the request under Clause 25, the requirement for an evaluation report under Section 32, the matters the Council must consider under Sections 74 and 75, and the higher-order documents identified by the applicant itself as relevant, including the National Policy Statement on Urban Development 2020, the National Policy Statement for

Freshwater Management, the Canterbury Regional Policy Statement, the Greater Christchurch Spatial Plan, and the Mahaanui Iwi Management Plan 2013.

Ecology and Waterways (Ōtūkaikino Stream Catchment and Downstream Receiving Environments)

12. The site adjoins, and its northern corner intersects, a tributary of the ecologically significant Ōtūkaikino Stream. This is treated as a priority area of scrutiny given the direct and cumulative downstream connection to a site of Ecological Significance and mapped At-Risk native fish habitat.

13. Existing water quality in the Ōtūkaikino Stream and its tributaries are already below the relevant regional plan target, raising a precautionary concern about additional contaminant and sediment loading from heavy industrial land use. Additional stormwater discharge, sediment, or contaminant loading associated with heavy industrial subdivision and use has the potential to further degrade an already-stressed waterway. The submitter objects that the proposal has not adequately assessed the capacity of an already degraded waterway (dissolved oxygen below the regional plan target) to absorb the additional contaminant and sediment loading reasonably anticipated from heavy industrial subdivision and use of the scale proposed.

14. A threatened native fish species' spawning habitat lies a short distance downstream of the site within the same waterway system. No species-level monitoring, triggers, or adaptive management mechanism is proposed to detect or respond to adverse effects on this habitat arising from construction or ongoing operational discharges. The applicant's position is that the presence of the habitat is acknowledged and noted as a potential cumulative effects receptor (paragraph 91), but no species-specific monitoring or adaptive management response is proposed in the Plan Change provisions. The submitter objects that no monitoring or adaptive management mechanism has been proposed to protect the mapped At-Risk Canterbury galaxias spawning habitat located a short distance downstream of the site, notwithstanding the scale of development enabled.

15. The riparian margin protecting the waterway relies on a 20m development setback and 10m planting buffer rather than a more robust and enduring protective mechanism, and no long-term funding, maintenance or enforcement mechanism is specified. The applicant's position is that the 20m buffer is 'sufficient to provide protection and enhancement' notwithstanding the more protective zoning option being rejected on the stated basis of Council's reluctance to accept land ownership. No mechanism (such as a consent notice, covenant, or body corporate maintenance obligation binding all future lot owners) is specified to ensure the buffer planting is established, survives, and is maintained in perpetuity once the site is subdivided into numerous individual industrial titles.

16. Erosion and sediment control during construction is not addressed by specific plan-change-level standards. Given the scale of earthworks anticipated for a 19ha, up to 200-lot industrial subdivision adjoining a waterway and wetland already below water quality targets, uncontrolled or inadequately controlled construction-phase sediment discharge represents a material risk to receiving waters. No specific performance standards, monitoring frequency, or enforcement pathway is proposed within the Plan Change itself - the safeguard is wholly reliant on a

subsequent, separate consent process not yet before Council. The submitter objects that construction-phase erosion and sediment control is not addressed by any specific standard within the Plan Change itself, notwithstanding the scale of earthworks anticipated adjoining a sensitive waterway and wetland.

17. Investigation of potential springs feeding the on-site waterway is incomplete, with the relevant part of the site not accessed, yet the report concludes springs are 'not expected to be impacted'. Groundwater interception or disturbance during earthworks and subdivision could adversely affect spring-fed hydrology supporting the waterway. The applicant relies on existing District Plan subdivision rules to require spring investigation at the time of future subdivision - the matter is deferred rather than resolved. The submitter objects that the conclusion that springs feeding the waterway will not be adversely affected is not yet supported by completed investigation, given the relevant area of the site has not been accessed.

Stormwater Management

18. Stormwater management relies on discharge to ground via soakage, without current groundwater level data. The absence of current groundwater level data introduces uncertainty as to which stormwater management approach will ultimately be required, and whether soakage-based discharge will perform adequately across the site given variable groundwater conditions. No detailed stormwater design has yet been prepared, tested, or subjected to independent review. The submitter objects that the feasibility of the proposed stormwater management approach has not been demonstrated with current groundwater data, detailed design and independent review.

19. The applicant identifies groundwater flow direction as “generally to the east”, potentially towards Clearwater Resort to the northeast. The applicant’s stormwater approach defers detailed design assessment to subdivision stage which poses a significant risk of contaminants from the site travelling towards areas where residential, recreational, and other sensitive uses exist.

Services

20. The PC24 site is not currently serviced by the reticulated wastewater network. The proposal was originally submitted seeking Industrial Heavy zoning but was subsequently dialled back in direct response to identified wastewater constraints. The submitter suggests that any connection to the Council system should be applicant funded and subject to elevated development contributions.

    The applicant has provided network capacity modelling which indicates that, under an ultimate growth scenario, Council wastewater network thresholds will be exceeded, however no immediate upgrades are proposed as part of the Plan Change.

Traffic and Transportation

21. The site fronts, and gains access from, a section of State Highway 1 / Johns Road that also serves as the primary access corridor for Clearwater Resort via the Clearwater Avenue intersection.

22. The applicant's own traffic modelling identifies increased delay specifically at the SH1 Johns Road / Clearwater Avenue intersection - the gateway intersection serving the golf course, resort and residential community - yet this has not been assessed in the context of golf, resort or event-related traffic patterns. The modelling predicts an increased PM peak northbound approach delay at the Clearwater Avenue intersection from 34 seconds to 52 seconds. No assessment has been presented of how this increased delay interacts with existing traffic patterns generated by Clearwater residents, golf club members and visitors (including tee-time clustering), resort guest arrivals/departures and functions, or tournament and event days when traffic volumes at this intersection are materially higher than an average weekday. The submitter objects that the increased delay identified at the SH1/Clearwater Avenue intersection has not been assessed against golf club, resort and event-related traffic patterns, which are the periods of greatest relevance and sensitivity to the submitter's operations.

23. No assessment has been presented of the interaction between new industrial heavy vehicle movements and existing recreational and resort-related vehicle movements along Johns Road / SH1 and at the Clearwater Avenue intersection. The proposal is predicted to generate 176 vehicle movements per hour at peak times, comprising 147 light and 29 heavy vehicle movements. No specific assessment addresses how these movements, including heavy vehicles associated with subdivision development and ongoing industrial activity, will interact with golfers, residents, and resort guests using the shared path facilities identified as linking to the site. Road safety auditing is deferred to a future detailed design stage rather than informing the current assessment. This is relevant to road safety and the submitter objects that the interaction between new heavy vehicle movements and existing vehicle movements has not been specifically assessed.

24. The proposal adds to an already acknowledged, unfunded network congestion issue at the Sawyers Arms Road roundabout, contrary to the RPS's own stated environmental outcome for network congestion management. The submitter objects that the proposal adds to an already unfunded and acknowledged network congestion issue on the SH1 corridor, contrary to the Regional Policy Statement's own stated outcome for network congestion management, without adequate assessment of cumulative effects.

25. The design of the site access intersection with SH1 is not finalised and is deferred to a future subdivision detailed design stage, subject to further NZTA consultation. There is a risk that the ultimately agreed design could differ from what is currently relied upon to support the traffic conclusions in this report. The submitter objects that the Plan Change is being advanced on the basis of an unresolved, concept-level intersection design that remains subject to further agreement with NZTA.

26. No independent traffic assessment has yet been obtained to test the applicant's modelling assumptions. The traffic conclusions rely entirely on modelling commissioned by the applicant (Novo Group's ITA, supported by QTP modelling). No independent verification of trip generation rates, distribution assumptions, or intersection modelling has been undertaken on behalf of affected parties.

Noise

27. The Plan Change does not propose any site-specific noise rules calibrated to the interface with Clearwater Resort.

28. No site-specific noise limits, measurement locations, or attenuation requirements are proposed for the interface between future industrial activity and the adjoining golf course, resort and residential receiving environment. Standard Industrial General zone noise standards are typically calibrated primarily to a residential interface. No assessment has been presented of whether those standard limits, measured at standard locations, adequately protect the specific and different sensitivities of an outdoor resort environment and overnight guest accommodation at the resort, both of which may be more sensitive to certain noise characteristics (e.g. early morning start-up noise, reversing alarms, intermittent impulsive noise) than a standard residential dwelling. The submitter objects that no site-specific noise assessment or rule has been proposed for the interface between the proposed industrial zoning and the adjoining golf course, resort accommodation and residential community, notwithstanding that other interface effects (setbacks, landscaping) have been specifically addressed.

29. Construction-phase noise and vibration during subdivision earthworks, wetland works, and intersection/road construction has not been assessed. Construction of a 19ha subdivision, including intersection upgrade works on SH1 and stormwater management area earthworks, will generate a sustained period of construction noise and vibration in proximity to outdoor recreational activity and overnight guest accommodation, both activities for which disturbance has a direct commercial and experiential impact. This matter does not appear to have been specifically addressed by the applicant. The submitter objects that construction-phase noise and vibration effects on the golf course and resort have not been assessed.

30. No assessment has been presented of night-time or extended-hours operational noise, notwithstanding the Industrial General zone can permit extended hours of operation. The resort's residential and overnight guest accommodation is a noise-sensitive activity for the full 24-hour period, in a manner different from standard residential exposure patterns. No operational hours restriction or night-time noise standard specific to this interface has been proposed. The submitter objects that night-time and extended-hours operational noise effects on the resort's overnight guest accommodation have not been assessed.

Lighting and Night Sky

31. The applicant expressly acknowledges that no controls over night-time lighting are proposed, and that light pollution 'may eventuate', without assessing the specific effect on the golf course, resort

or residential amenity. Uncontrolled industrial lighting adjoining a golf course and a resort that relies on a rural, dark, open outlook as part of its accommodation and hospitality offering has the potential to materially change the night-time character and visual amenity experienced by golf course users at dawn/dusk periods, and by resort guests from accommodation, function spaces and grounds. The submitter objects that no lighting controls are proposed for the interface with the golf course and resort, notwithstanding the applicant's own acknowledgment that light pollution may result.

Visual and Landscape Effects

32. The landscape and visual assessment's conclusion that effects are acceptable is not tested from golf-course or resort-specific viewpoints. The general conclusion that the site 'reinforces existing adjacencies' and does not create 'abrupt or sensitive transitions' is reached at a broad landscape-character level. It does not specifically evaluate the visual experience from golf course fairways, greens, and clubhouse areas, or from resort guest accommodation, function spaces and grounds, where the working industrial subdivision would become part of the visible outlook in place of the existing open pasture and rural character. The submitter objects that the landscape and visual assessment does not include analysis from specific golf course and resort viewpoints.

Air Quality and Dust

33. Dust management relies solely on future Regional Air Plan consenting, with no plan-change-level dust management conditions for the construction phase. Construction of a 19ha, up to 200-lot industrial subdivision, including significant earthworks, has clear potential to generate airborne dust. A golf course is a use particularly sensitive to airborne dust and particulate deposition, which can affect turf health, playing surface quality, and player experience, in addition to general amenity effects on residents and resort guests using outdoor grounds and facilities. The submitter objects that construction dust effects on the adjoining golf course, a particularly dust-sensitive land use, have not been specifically assessed.

34. No assessment has been presented of odour or air discharge risk associated with the range of activities that could establish under the Industrial General zone, in relation to outdoor recreation and accommodation receptors. The Industrial General zone permits a wide range of activities, several of which have the potential to generate odour or air discharges (e.g. certain manufacturing, processing, or storage activities). No assessment has been presented of this risk in relation to a receiving environment that includes outdoor recreational activity. The submitter notes, and reserves the right to expand upon with further evidence, a concern that the range of activities enabled by the Industrial General zone has not been specifically assessed for odour or air discharge risk to the adjoining golf course and resort.

Reverse Sensitivity

35. The applicant's Reverse Sensitivity assessment addresses only Christchurch International Airport, NZTA, and generic Rural Urban Fringe land — it contains no specific analysis of the golf course, resort, or residential estate, despite these being identified in the applicant's own site description as immediately adjoining and nearby land uses. Heavy industrial-type activity established directly opposite and adjacent to an operating golf course and integrated resort creates a foreseeable risk that new industrial occupiers may, over time, generate complaints about existing, lawful golf and resort operational activities (for example, early morning course maintenance, mowing, irrigation, spraying, functions and events, or floodlighting for evening functions), creating pressure to constrain those pre-existing lawful activities. The submitter objects that the Plan Change's Reverse Sensitivity assessment omits any specific analysis of the golf course, resort or residential estate, notwithstanding these being identified as immediately adjoining or proximate land uses in the applicant's own site description.

36. No mechanism is proposed to manage future complaint risk from new industrial occupiers toward the pre-existing lawful golf, resort and residential activities. Without a mechanism such as a reverse sensitivity acknowledgment registered against future industrial titles (recording the presence of, and accepting the lawful effects associated with, the adjoining recreation and tourism activities), there is a risk that new industrial occupiers, unaware of or unaccustomed to an adjoining recreation and tourism environment, could later seek to restrict lawful golf course or resort operations through complaint. The submitter objects that no reverse sensitivity acknowledgment or covenant mechanism is proposed to be registered against future industrial titles to protect the pre-existing lawful operation of the golf course and resort.

Loss of Open Space and Rural / Urban Character

37. The proposal removes the last remaining open rural/pastoral land functioning as an informal landscape and amenity buffer between the existing industrial zone and Clearwater Resort. The 19ha site currently provides open pastoral character between the existing Industrial Heavy zone to the west and Clearwater Resort to the east. Its rezoning to Industrial General removes this land as an informal buffer, with the only remaining separation being the proposed 10–20m setback and landscaping strips. The submitter objects that the proposal removes the last remaining area of open rural character buffering Clearwater Resort from existing industrial land, without this cumulative loss of character being specifically assessed.

38. Approval of this Plan Change would close the remaining gap between the existing Harewood North industrial area and Clearwater Resort, creating a risk of setting a precedent for further industrial expansion toward Clearwater Avenue. If approved, the site would represent the full eastward extension of industrial zoning to the edge of Clearwater Resort, potentially establishing a precedent that could be relied upon by future applicants seeking further industrial rezoning closer to, or within, the Clearwater area.

Economic Case

39. The economic case is tested here in the spirit of Section 32, not simply opposed as a matter of principle.

40. The claimed absence of vacant freehold industrial land in 'Harewood North' has not been independently verified, and the applicant's own evidence suggests the adjoining 'Harewood South' Industrial Park undersupply may reflect a zoning/market mismatch rather than genuine citywide land shortage. If the underlying issue in Harewood South is that the Industrial Park zoning does not suit current market demand (as the applicant's own evidence at paragraph 125 suggests: 'this zone has not attracted any significant development during the last 10 years'), then the appropriate response may be to address zoning settings or land use within the existing urban area, rather than to extend the urban boundary through a new greenfield rezoning, consistent with the RPS's consolidation-first policy direction. The submitter raises a concern that the Plan Change's 'no alternative supply' narrative has not been independently verified, and that the underlying issue in the adjoining Industrial Park zoned land may reflect a zoning/market mismatch rather than a genuine absence of developable industrial land in the locality.

41. The Greater Christchurch Spatial Plan is a strategic document which identifies appropriate locations for new and expanded industrial zones, which Councils are to give effect to through their planning documents. The Spatial Plan was implemented to satisfy the requirements under the NPS-UD, which provides national direction on how urban growth ought to occur.

    The Spatial Plan identifies that there is currently a significant surplus of industrial land in Greater Christchurch (645ha over 30 years) and identifies Selwyn District, particularly Rolleston, as the preferred location for future industrial growth. The applicant relies on the "responsive planning" provisions of the NPS-UD to circumvent this.

    For Greater Christchurch, the assessment identifies that there is likely to be sufficient industrial land for the next 30 years and beyond and therefore there is no need for additional industrial land to be rezoned, especially at this location.

Relief Sought

42. For the reasons set out in this submission, the submitter's position is that the Plan Change should not be approved.

43. The submitter requests the opportunity to be heard in support of this submission, and to present further evidence, including independent expert evidence, in support of the matters raised.

Conclusion

44. The Plan Change would introduce a significant industrial rezoning immediately adjoining, and in parts within the same waterway catchment as, an operating golf course, a resort accommodation and hospitality operation, and an established residential community. The applicant's own Section 32 report contains a comprehensive assessment of many matters, but, on the material available to the submitter, does not specifically or adequately assess the effects of the proposal on the golf course, resort or residential community as receiving environments in their own right, particularly in relation to reverse sensitivity, noise, lighting and traffic at the Clearwater Avenue interface. Several of the mitigations the report otherwise relies upon, including wetland and riparian protection, stormwater treatment, erosion and sediment control, and intersection design, are deferred to later, separate consent processes rather than secured now.

45. The submitter(s) considers the applicant's proposal lacks sufficient information, including an adequate s32 assessment, for a decision maker to be satisfied it holds the required information to determine the Plan Change pursuant to the RMA, including regarding the assessment of environmental effects.

    The applicant has failed to adequately assess the relevant objectives and policies under the Christchurch District Plan, and other higher order planning instruments, including the National Policy Statement of Urban Development 2020 (NPS-UD) and National Policy Statement for Highly Productive Land 2022.

Signed:



Michael Sharp
General Manager and Authorised Agent
Clearwater Golf Club Limited

Date: 27.8.26.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Brian **Last name:** McLauglin

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Ecology and waterways, stormwater management, services, traffic and transportation, noise, lighting and night sky, visual and landscape effects, air quality and dust, reserve sensitivity, loss of open space and rural/urban character, and the economic case.

The reasons for my / our submission are: (use additional pages if required)

I am submitting in complete support of the submission made by the clearwater resort owners society incorporated and clearwater golf club limited

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

reject the plan change in its entirety

Attached Documents

Name
Submission on PPC24 - Brian McLaughlin

Christchurch City Council

T24Consult Page 150 of 212

Submission on a Publicly Notified Plan Change to the Christchurch District Plan

Resource Management Act 1991 – Form 5

Email to: PlanChange@ccc.govt.nz ; or
Deliver to: Ground floor reception, Christchurch City Council, 53 Hereford Street, Christchurch Attn: City Planning Team; or
Send to: City Planning Team, Christchurch City Council, PO Box 73012, Christchurch, 8154

For enquiries phone: (03) 941 8999

1. I wish to make a submission on:

Plan change name & number: 24. 370 – 448 Johns Road, Russley

2. Submitter details

Full name of submitter: Brian McLaughlin

Street address: 24 Mayfly Lane, Northwood, Christchurch 8051

Postal Address (if different):

Contact phone number (daytime): (03) 359 8889 Postcode: 8051

Email: brianmclaughlin46@hotmail.com

My address for service for receiving documents and communication about this plan change is: ☑ By email ☐ By post

3. Submission details

I / We:
- ☐ Support all or part of the plan change
- ☑ Oppose all or part of the plan change
- ☐ Am neutral towards the plan change

The specific provisions of the plan change that my / our submission relates to are: *(give details, using additional pages if required)*

Ecology + waterways, stormwater management, services, traffic + transportation, noise, lighting + night sky, visual + landscape effects, air quality + dust, reverse sensitivity, loss of open space + rural / urban character, and the economic case.

The reasons for my / our submission are: *(use additional pages if required)*

I am submitting in complete support of the submission made by the Clearwater Resort owners Society Incorporated and Clearwater Golf Club Limited.

The decision I / we would like the Council to make is: *(give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of any conditions sought. Use additional pages if required)*

Reject the Plan Change in its entirety.

4. Trade competition

I / We: ☐ **could** / ☑ **could not** gain an advantage in trade competition through this submission.

If you are a person who could gain advantage in trade competition through this submission, are you directly affected by and effect of the proposed plan charge/part of the plan change that –

a) adversely affects the environment, and

b) does not relate to the trade competition or the effects of trade competition?

☐ Yes ☐ No

5. Hearing of this plan change

If a hearing is held, I / we:

☐ **Wish to** speak in support of my / our submission

☑ **Do not wish to** speak in support of my / our submission

☐ If others make a similar submission I / we will consider presenting a joint case with them at the hearing

Please note that a hearing will only be held if any of the submitters wish to be heard, but all submissions will be taken into consideration regardless.

If you change your mind about whether you wish to speak at the hearing, please contact the Council by telephone on 941 8999 or by email at PlanChange@ccc.govt.nz.

6. Signature (of submitter(s) or person authorised to sign on behalf of submitter(s)

Signature: [signature] Date: 26.8.26.

Signature: Date:

Note: A signature is not required if you make your submission electronically

Important information

1. The Council must receive your submission before the closing date and time for submissions on this plan change.
2. If you are a trade competitor, your right to make a submission may be limited by the provisions in Part 11A of the RMA.
3. The Council may strike out a submission (or part of it) in the following situations:
   - It is frivolous or vexatious
   - It discloses no reasonable or relevant case
   - It would be an abuse of the hearing process to allow it to be taken further
   - It contains offensive language
   - It is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matters.

Privacy information

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker).

Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this plan change prior to making your submission.

Office use only

Received at the ..... Office on ..... at ..... am / pm

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Kim **Last name:** Seaton

Organisation: Townsmith Planning Ltd

On behalf of: Isaac Conservation Trustees Ltd

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Am neutral towards the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

The entire change.

The reasons for my / our submission are: (use additional pages if required)

The Isaac Conservation Trustees and their staff use the existing legal road corridor off Johns Road, where the new main entrance to the proposed zone is to be located, to access the eastern extent of their land holdings (Lot 2 DP 318667). This is enabled in part by an existing access agreement with Environment Canterbury, whereby staff of the Trustees have authorised access through a locked gate at the eastern extent of the legal road, and along on a track on the southern edge of Clearwater Resort, to reach the Trustee's property.

The Trustees are concerned that it is unclear in the proposed plan change whether or how vehicle access along the legal road will be maintained through the development process, when the new road and intersection are being constructed to urban standards. It is important that vehicular access to the Trustee's land is maintained at all times via this route, including for the purposes of maintenance and enhancement work by staff.

It is also unclear the extent to which the Plan Change proponent intends to form (to urban standards) the

existing road corridor marked/coloured grey on the proposed Outline Development Plan (ODP). It would be helpful to understand this, as the road in its entirety is indicated as sitting outside the ODP boundary. The question goes to the extent of potential access disruption during construction.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

To clarify how vehicular access along the existing legal road corridor is to be maintained to landholdings to the north during construction, including to Clearwater and the submitter's land identified above. To provide assurance, including through amendment to the provisions of Section 16.5.6.1.1 Permitted Activities, that maintenance of access will be required at the time of development. This could be achieved for example by amending Rule 16.5.6.1.1 P1 to include a further activity specific standard (a)(iii), requiring vehicular access along the legal road corridor to be maintained at all times.

Any other similar relief that would address the relief sought by the Isaac Conservation Trustees Ltd.

All necessary consequential amendments.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Craig **Last name:** Roberts

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

I am writing to register my opposition to the PPC24 plan to change urban fringe land adjoining residential land to industrial zoning.

As a resident of Gardiners Road North, I have several concerns regarding this proposal and its impact on the environment and surrounding residents. I believe it degrades the quality of life for those living in the immediate and surrounding areas. It proposes changing a lovely country aspect bordering a growing residential area into an industrial zone resulting in a loss of the rural fringe character that makes this part of Christchurch special.

Unknown types of buildings and structures would appear. While functional, these might be blunt and ugly as industrial areas aren't always designed for aesthetics. This would create a new skyline visible to those on the South side and those travelling North on Gardiners Road from Wilkinsons Road, redefining the area's feel. There appears to be no consideration for the appearance of the Southern boundary, which will be the most publicly viewable part.

These future businesses would bring a host of associated negative attributes. Traffic volumes have been identified as significant. Of particular worry is the potential for Gardiners Road to become a common route for much of this traffic, especially heavy vehicles. This area is experiencing residential growth, especially with the new 230-house development (PPC22) currently under review. This development alone will increase traffic without factoring in the traffic from the new industrial area. This is not ideal for an area growing with young families and children.

What noise would these businesses generate and what SH1 motorway traffic noise would new structures reflect back toward the residential zone? The list goes on. I, my family and other neighbours feel strongly that this is definately not a positive development for the area.

Craig Roberts.

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional

pages if required)

As outlined in my first document.

The reasons for my / our submission are: (use additional pages if required)

Again covered in the first document.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

Not to change the current zoning status.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Andrew **Last name:** Klaver

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

We object to all of the plan to rezone this land to industrial

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The reasons for my / our submission are: (use additional pages if required)

Part of this land is a working family farm, and rezoning it for industrial use will have a detrimental impact on the farm and surrounding properties. Industrial development could also lead to adverse effects on water quality, including the risk of polluted stormwater or other discharge entering nearby streams.

We are also concerned about the significant increase in noise that could result from industrial activities. Given the close proximity to The Groynes, we are concerned that increased noise, traffic and potential pollution could negatively affect this recreational area.

The noise, congestion and air quality have already deteriorated following the upgrade of Johns Road and West Belfast Bypass and this proposal will only exacerbate these impacts.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

Retain the land as Rural Urban Fringe

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Viatcheslav and Natalia **Last name:** Meyn

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

see attached

The reasons for my / our submission are: (use additional pages if required)

see attached

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

see attached

Attached Documents

Name
Submission_PPC24_Johns_Road_joint

SUBMISSION AND OBJECTION
IN RESPECT OF PROPOSED PRIVATE PLAN CHANGE 24 — JOHNS ROAD

370–448 Johns Road, Russley, Christchurch (JRCD Limited)

To:
The Chief Executive
Christchurch City Council
PO Box 73015
Christchurch 8154
Email: planchange@ccc.govt.nz

From:
Viatcheslav Meyn and Natalia Meyn
19 Clearwater Avenue, Northwood, Christchurch 8051
E-mail: natmeyn@gmail.com Phone: 021772767

Re:
Proposed Private Plan Change 24 — Johns Road ("PPC24"), requested by JRCD Limited under Clause 21 of Schedule 1 to the Resource Management Act 1991 — rezoning of 370, 390, 432 and 448 Johns Road from Rural Urban Fringe to Industrial General, together with an associated Outline Development Plan and area-specific rules ("the Plan Change").

Submitter details and formal matters

1. This submission is made by Viatcheslav and Natalia Meyn ("the submitters"), in their personal capacity as residents and owners of 19 Clearwater Avenue, Northwood, Christchurch 8051. The submitters object to the Plan Change in its entirety, and to each of its constituent provisions, for the reasons set out below.

2. The submitters are not in a position to gain an advantage in trade competition through this submission. It is made in their personal capacity as residents and property owners, and is not made on behalf of, in the interests of, or by reference to the interests of any business.

3. The applicant has undertaken no consultation with the submitters on the proposed Plan Change.

4. The submitters are aware that Clearwater Resort Owners' Society Incorporated, and J & L McVicar of 5 Clearwater Avenue, have each lodged their own submissions opposing the Plan Change. The submitters agree with, and adopt, the matters and grounds raised in both of those submissions, and lodge this submission in support of, and consistent with, those points, from their own perspective as nearby residents directly affected by the Plan Change. Where this submission does not repeat every matter raised in those submissions, that omission is not to be read as disagreement with them.

5. The submitters' property at 19 Clearwater Avenue is one of the properties specifically identified in the applicant's own landscape and visual assessment as adjoining the Plan Change site and among the most affected viewing audiences — a matter addressed in detail at paragraphs below.

6. The submitters wish to be heard in support of this submission. If others make a similar submission, the submitters will consider presenting a joint case with them at the hearing.

7. The submitters intend, where appropriate, to call or rely on expert evidence in support of the grounds raised in this submission, including planning, transport and road-safety, acoustic, lighting, hydrological and hydrogeological, ecological and landscape evidence, and to address evidence subsequently produced by the applicant.

Relief sought

8. The submitters' primary relief is that PPC24 be declined in its entirety, with the land retaining its Rural Urban Fringe zoning.

9. If the Council is not prepared to decline PPC24, and considers that material transport, groundwater, wetland, stormwater, infrastructure or other site-suitability matters cannot properly be determined on the evidence before it, the submitters seek that determination be adjourned or deferred, to the extent lawfully available, until sufficient information is available to determine those matters, including comprehensive site-verified and seasonally continuous wetland and ecological assessment (including of 448 Johns Road) and an updated transport assessment addressing the Industrial General proposal and its cumulative network and road-safety effects.

10. If the Council is not prepared to decline or defer PPC24, the submitters seek, as a further alternative, that any rezoning exclude 370 Johns Road, and that the Outline Development Plan, area-specific provisions and staging elements be amended accordingly, so as to retain a materially greater Rural Urban Fringe buffer between the proposed industrial area and the nearby residential environment, including the submitters' property, and to remove industrial zoning from the closest residential interface.

11. If the Council nevertheless approves PPC24 in whole or in part, the submitters seek amendments to the Outline Development Plan and area-specific provisions necessary to address the grounds in this submission, including: a safe and workable access and transport outcome that does not transfer turning or heavy-vehicle effects onto Clearwater Avenue, Gardiners Road or other constrained parts of the network; staging provisions that prohibit a development sequence assuming participation of 448 Johns Road unless unencumbered title or binding legal covenants are secured beforehand; a durable buffer, riparian planting, screening and maintenance obligations at the closest residential and Rural Urban Fringe interfaces, secured by covenant or consent notice rather than left to future lot owners; a continuous landscaped screening strip along the full Johns Road frontage sufficient to screen buildings and activity from view, together with area-specific signage controls prohibiting illuminated, digital, moving and off-site advertising signage; controls on built form, noise (including a daytime and night-time maximum noise level at the residential interface, and controls on sirens and tonal reversing alarms), operating hours, lighting and air effects; construction-phase controls on dust, noise, vibration and heavy-vehicle activity; robust, seasonally-verified stormwater, groundwater, freshwater and ecological outcomes; and effective long-term monitoring and enforcement. The submitters also seek such consequential or alternative relief within the scope of this submission as is necessary to address the concerns raised.

Planning and strategic framework

12. The Plan Change is an admitted departure from the planned urban form. The applicant's own July 2026 report acknowledges that, because the site is outside the urban area, the proposal is "clearly contrary" to the Regional Policy Statement and District Plan policy seeking to avoid urban development outside the planned urban area. The submitters say that admitted conflict requires a strong planning justification, not merely evidence that additional industrial land would be commercially useful, and that the applicant has not provided one.

13. Under section 75(3) of the Resource Management Act 1991, the District Plan must give effect to relevant national policy statements and the Canterbury Regional Policy Statement, including the National Policy Statement on Urban Development 2020 (NPS-UD), the National Policy Statement for Freshwater Management (NPS-FM), and the National Policy Statement for Infrastructure 2025 (NPS-I), which came into force on 15 January 2026, after PPC24 was lodged, and must nonetheless be given effect to. The submitters say it has not been demonstrated that PPC24 gives effect to Policy 10 (managing the interface between

infrastructure and other activities so that infrastructure operation is not compromised) or Policy 11 (responsibility for managing adverse effects resting with the new activity) of the NPS-I.

14. Section 32 requires an evaluation of whether the proposed objective is the most appropriate way to achieve the purpose of the Act, including the risk of acting or not acting on uncertain or insufficient information under section 32(2)(c). The submitters say the section 32 evaluation is too narrowly focused on site-specific alternatives for this land, without adequately weighing whether the claimed need requires this Rural Urban Fringe land to be industrialised at all, given the existing and approved industrial capacity referred to below.

15. The claimed need and significance case is not made out. On the applicant's own figures, the rezoning would enable approximately 53,550m² of new industrial floorspace, around 2.4 years of supply for the applicant's own narrowly-defined "Harewood North" local market — a figure the applicant's own economist accepts "may not be considered significant on a purely numerical basis." The wider evidence, which the applicant accepts, records a substantial city-wide surplus of industrial land (approximately 544 hectares), and approximately 118 hectares of freehold industrial land (including 126 freehold lots at Ryans Road, Harewood) has since been approved nearby under fast-track approvals in May 2026 — more than six times the gross area of PPC24, in the same part of the city the applicant says is short of freehold supply. The submitters say a shortage of vacant freehold lots in a narrowly-drawn local sub-market is not the same as a demonstrated shortage of industrial development capacity for planning purposes.

16. A substantial part of the rezoning area cannot deliver what the application claims. 448 Johns Road — the parcel that physically joins the existing industrial area to the rest of the PPC24 site — is owned by a party who does not want it rezoned and is not part of the request. The Plan Change's own rules (rule P3) allow Rural Urban Fringe activities to continue on that land indefinitely. The submitters say the applicant should not be able to rely on an unwilling third party's land to portray a "consolidated and connected" outcome, to found claims of timely deliverability, or to provide shared pathway, bunding or access functions on which the assessment depends, and that decision-makers should give materially less weight to claims of capacity, timing and consolidation that depend on land the applicant does not control and which has not been investigated to the same standard as the rest of the site.

Ecology and Waterways (Hedges Waterway / Ōtūkaikino Catchment)

17. Hedges Waterway runs along the northern part of the site and is a tributary of the ecologically significant Ōtūkaikino system, a Site of Ecological Significance in the District Plan. The applicant's own freshwater assessment identifies mapped Canterbury galaxias spawning habitat approximately 140 metres downstream, with further connection to the Groynes and the Waimakariri River. The submitters object that the proposal has not adequately assessed the capacity of this connected waterway system, which is already below relevant water quality targets, to absorb additional contaminant and sediment loading from heavy industrial subdivision and use of the scale proposed, and that no species-level monitoring or adaptive management mechanism is proposed to protect the mapped spawning habitat.

18. Through the further-information process, a natural inland wetland has now been confirmed on the riparian margin of Hedges Waterway. This engages the National Policy Statement for Freshwater Management 2020, including Policy 6 (no further loss of extent of natural inland wetlands) and the National Environmental Standards for Freshwater. The submitters note that, under clause 3.22(1)(c) of the NPS-FM, the urban development exception to the wetland policy is available only where, among other matters, the activity occurs on land already identified for urban development and does not occur on land zoned rural — which, on its current Rural Urban Fringe zoning, this site is. The submitters say this confirmed wetland is a substantive planning constraint on the rezoning decision itself, not a detail that can be left to later consenting.

19. More than a third of the rezoning area — 448 Johns Road — has not been subject to the same on-site wetland, spring and ecological assessment as the rest of the site, because landowner access was unavailable. The submitters object that key parts of the freshwater setting, including spring locations feeding Hedges Waterway, remain unmapped and unverified in the area relied upon to support the rezoning.

20. The riparian margin relies on a 20m development setback and 10m planting buffer without a long-term funding, maintenance or enforcement mechanism. The submitters object that no mechanism (such as a consent notice, covenant, or body corporate maintenance obligation binding all future lot owners) is specified to ensure the buffer planting is established, survives, and is maintained in perpetuity once the site is subdivided into numerous individual industrial titles.

21. Construction-phase erosion and sediment control is not addressed by any specific standard within the Plan Change itself, notwithstanding the scale of earthworks anticipated for a 19-hectare, up to 200-lot industrial subdivision adjoining a sensitive waterway and wetland.

Stormwater, Groundwater and Infrastructure

22. The site is affected by the Christchurch Groundwater Protection Zone and sits above an unconfined aquifer. The District Plan itself, through Policy 16.2.3.2, restricts the quantity of wastewater discharged in areas over unconfined or semi-confined aquifers to minimise contamination risk. The submitters object that the applicant's conclusion that the groundwater protection zone will not be adversely affected is premature, given that seasonal groundwater levels have not been established and the stormwater treatment and disposal solution remains unresolved.

23. Groundwater monitoring to date consists of single measurements taken at drilling from four bores, with no data confirming seasonal variation and no long-term monitoring bore nearby, notwithstanding advice that levels are likely higher in winter and that groundwater mounding near soakage facilities could locally alter shallow flow toward Hedges Waterway. The submitters object that the feasibility of the proposed stormwater management approach has not been demonstrated with current, seasonally-verified groundwater data, detailed design and independent review.

24. The stormwater management area remains indicative as to type, size and location, following removal of the only basin previously available at 470 Johns Road. The submitters note that a rule requiring the stormwater area to be proven feasible before development could occur was proposed by the applicant in December 2025 and then withdrawn in July 2026 on the basis that it was unenforceable, with nothing proposed in its place. The submitters object that this leaves an undefined stormwater footprint carrying both the servicing function and part of the amenity mitigation relied upon by the landscape and urban design assessments.

25. The PC24 site is not currently serviced by the reticulated wastewater network, and the applicant's own modelling identifies that Council wastewater network thresholds will be exceeded under an ultimate growth scenario, with no immediate upgrades proposed. The submitters suggest that any connection to the Council network should be applicant-funded and subject to elevated development contributions.

Traffic and Transportation

26. The site fronts, and gains access from, a section of State Highway 1 / Johns Road that also serves as the primary access corridor for the submitters' home and the wider Clearwater community via the Clearwater Avenue roundabout — the sole entry and exit point for the entire Clearwater residential and business community. The applicant's own Integrated Transport Assessment records approximately 30,073 vehicles per day on this section of Johns Road, and

55 reported crashes between Sawyers Arms Road and Clearwater Avenue over 2020–2025, including three serious-injury crashes.

27. The applicant's traffic modelling predicts an increased PM peak northbound approach delay at the Clearwater Avenue intersection from 34 to 52 seconds, reaching 100% saturation on one model, while a cross-check model produces materially different results (approximately 83% saturation). The submitters say this divergence itself indicates that the relevant intersections are operating in a range where modelled performance becomes unstable, which is precisely the range in which safety and operational effects most need expert testing — testing which has not been assessed against golf, resort or event-related traffic patterns, or independently verified on behalf of affected residents.

28. PPC24 proposes a single left-in / left-out access to Johns Road, meaning all outbound traffic must pass through or U-turn at the Clearwater roundabout, and inbound traffic from the north-east must U-turn at Sawyers Arms. NZTA's own recorded feedback states that this arrangement "would greatly intensify the traffic generation on the highway network" and relies on a roundabout "not designed for heavy vehicles to use to turn around"; the applicant's own heavy-vehicle tracking acknowledges that a semi-trailer U-turn may "marginally encroach the outside circulating lane and/or touch the mountable kerb." The submitters object that this road-safety interaction, and its effect on pedestrians and cyclists using the Clearwater roundabout crossing facilities, has not been adequately assessed.

29. The proposal is predicted to generate 176 vehicle movements per hour at peak times (147 light, 29 heavy), with modelling showing that congestion-driven rerouting would divert some trips onto Gardiners Road, Sawyers Arms Road and the Waimakariri corridor — up to 22 outbound vehicles per hour in the AM peak and 40 in the PM peak on Gardiners Road, including heavy vehicles. The submitters note that this needs to be assessed cumulatively with the separate PPC22 proposal for approximately 230 new dwellings at Styx Mill and Gardiners Roads, rather than in isolation, and that the applicant did not support a heavy-vehicle routing restriction on Gardiners Road.

30. A separate merge/diverge safety issue arises near the proposed site access, where the existing Greywacke Road acceleration lane's merge taper terminates only about 120 metres from the proposed access on an 80km/h State Highway. The submitters say this requires proper expert road-safety assessment rather than deferral to a future detailed design stage.

31. The original Integrated Transport Assessment was prepared for the earlier Industrial Heavy zoning request and was not rebuilt when the request changed to Industrial General. The submitters say the transport, land market, and landscape/urban design/groundwater assessments relied upon were in some cases prepared for a different site area or zoning than that notified, and that this bears on the weight the section 32 evaluation can properly carry.

32. The Integrated Transport Assessment records no public transport route serving the site, with the nearest stop approximately 1.5km away on foot via the Clearwater crossing facilities, and shared-path connections that depend on 448 Johns Road — land not controlled by the applicant. The submitters say this bears on whether the proposal is "well connected" for the purposes of clause 3.8 of the NPS-UD and Policy 1(c) (accessibility by public or active transport).

Noise

33. The Plan Change does not propose any site-specific noise rules calibrated to the interface with nearby residential properties, including the submitters' home. Standard Industrial General zone noise standards are typically calibrated to a residential interface generally, but do not adequately address the intermittent, short-duration and tonal noise (early morning start-up, reversing alarms, impulsive noise) actually experienced on nearby residential and rural-residential properties. The District Plan does not restrict operating hours in the Industrial General Zone,

and no night-time noise standard specific to this interface has been proposed. The submitters object that construction-phase and operational noise effects on nearby residents have not been adequately assessed, and seek a daytime and night-time maximum noise level and controls on sirens and tonal reversing alarms at the residential interface.

Lighting and Night Sky

34. The applicant acknowledges that no controls over night-time lighting are proposed and that light pollution "may eventuate," without assessing the specific effect on nearby residential properties. The applicant's own freshwater advice separately recommends that lighting be designed to face away from Hedges Waterway, and its own section 32 assessment of the Mahaanui Iwi Management Plan acknowledges that some light pollution may conflict with that Plan's aspirations regarding nighttime darkness. The submitters object that no lighting controls or curfew are proposed for the interface with nearby residential properties.

Visual and Landscape Effects — including the specific assessment of 19 Clearwater Avenue

35. The submitters' property at 19 Clearwater Avenue is one of only three residential properties (together with 5 Clearwater Avenue and 360 Johns Road) identified by name in the applicant's own landscape and visual assessment as adjoining the Plan Change site. Of the eleven viewing audiences addressed in that assessment's summary table, ten are given a viewpoint number, a marked position on the viewpoint location plan, and a photograph. The row covering the submitters' property, together with 5 Clearwater Avenue and 360 Johns Road, is the only audience described as adjoining the site, records a fixed and permanent residential view, and is rated "low" — yet its viewpoint reference is "N/A". In other words, the properties the applicant's own assessment treats as the most exposed are the only ones not visited, photographed, or located on a viewpoint plan.

36. The assessment's "low" rating for the submitters' property depends on an untested proposition — that the dwellings are oriented so that their main outlooks fall within their own grounds and away from the site — reached without a site visit to private property; the underlying vegetation assessment confirms its site visit was confined to publicly accessible road frontages, with professional judgement applied where access was limited. The submitters object that the landscape and visual assessment's conclusion, so far as it concerns their own property, has not been tested by a viewpoint, photograph, or visit, and cannot properly be relied upon to conclude that effects on their outlook and amenity are acceptable.

37. The submitters further note that the closest residential interface (370 Johns Road adjoining 360 Johns Road) is proposed to be managed only by a 10 metre building setback and a buffer strip planted at one tree per 10 metres, with no requirement to retain existing screening vegetation along that boundary. A building that does not meet the setback is a restricted discretionary activity that the notified provisions expressly exempt from public notification, so an adjoining owner would have no notice of, or ability to participate in, an application to build closer to their home; and the corresponding matter of discretion is confined to visual amenity, not noise, lighting, dominance, privacy, hours of operation or vehicle and yard activity. The submitters object that this is not an adequate response at the interface closest to their own neighbourhood, and adopt the more detailed submission on this point made by J & L McVicar.

Air Quality and Dust

38. Dust management relies solely on future Regional Air Plan consenting, with no plan-change-level dust management conditions for the construction phase of a 19-hectare, up to 200-lot industrial subdivision. The submitters object that construction dust effects on nearby residents and the adjoining golf course, a particularly dust-sensitive land use, have not been specifically

assessed, and that no assessment has been presented of odour or air discharge risk from the range of activities the Industrial General zone would permit.

Reverse Sensitivity

39. The applicant's Reverse Sensitivity assessment addresses only Christchurch International Airport, NZTA, and generic Rural Urban Fringe land, with no specific analysis of the nearby residential estate, golf course, or resort, despite these being identified in the applicant's own site description as immediately adjoining and nearby land uses. The submitters object that no reverse sensitivity acknowledgment or covenant mechanism is proposed to be registered against future industrial titles to protect the pre-existing lawful use and enjoyment of nearby residential properties, the golf course and resort.

Loss of Open Space, Rural Character, and the Johns Road Frontage

40. The proposal removes the last remaining open rural/pastoral land functioning as an informal landscape and amenity buffer between the existing industrial zone and the residential and recreational environment to the east, including the submitters' neighbourhood. The submitters object that this cumulative loss of character has not been specifically assessed, and that approval risks setting a precedent for further industrial expansion toward Clearwater Avenue.

41. No area-specific landscaping or signage control is proposed for the Johns Road frontage itself, notwithstanding that this frontage faces the State Highway, nearby residential properties, and the route travelled by everyone visiting the Groynes, Clearwater, Northwood and the airport. The submitters seek a continuous landscaped screening strip along the full Johns Road frontage and controls prohibiting illuminated, digital, moving and off-site advertising signage.

Cultural Values

42. The applicant's own section 32 assessment recognises the Mahaanui Iwi Management Plan, which the Council must take into account under section 74(2A) of the Resource Management Act, and records that no further response had been received from Whitiora as at December 2025. Given Hedges Waterway's connection to the Ōtūkaikino system, the submitters consider the final decision should record the outcome of mana whenua consultation and address any cultural values or recommendations that emerge, without purporting to speak for mana whenua themselves.

Economic Case

43. The economic case is tested here in the spirit of Section 32, not simply opposed as a matter of principle.

44. The claimed absence of vacant freehold industrial land in the applicant's narrowly-defined "Harewood North" market has not been independently verified, and does not account for the established leasehold market on Johns Road, or the approximately 118 hectares of freehold industrial land approved nearby in May 2026 (Ryans Road and Pound Road), including 126 freehold lots in the same suburb the applicant says is undersupplied. The submitters say the applicant's own acknowledged city-wide surplus of approximately 544 hectares, sufficient to meet projected demand for 30 years, is not answered by an argument about tenure and location within that surplus.

45. The applicant's economist describes the claimed employment and GDP benefits as gross figures, with displacement effects not quantified. The submitters say the net benefit attributable to PPC24, rather than gross activity that could occur on the site regardless, has not been demonstrated, and that no assessment has been presented of the value of the established visitor, recreation and tourism economy that this proposal places at risk.

Conclusion

46. PPC24 is an admitted departure from the planned urban form, advanced on a need and significance case that the applicant's own evidence does not support once the city-wide surplus and recently-approved nearby capacity are taken into account, and reliant in material respects on land (448 Johns Road) the applicant does not control. It would place an unplanned industrial precinct beside a confirmed natural inland wetland and spring-fed waterway, above an unconfined aquifer, with unresolved groundwater, stormwater and infrastructure questions, and with road safety and access questions at already-constrained intersections that the applicant's own divergent modelling shows are operating close to capacity. The applicant's own landscape and visual assessment identifies the submitters' property, together with 5 Clearwater Avenue and 360 Johns Road, as amongst the most exposed receiving environments, without ever testing that conclusion by a site visit, photograph or viewpoint.

47. For these reasons, and the reasons set out above, the submitters consider the applicant's proposal lacks sufficient information for a decision-maker to be satisfied that it holds the information required to determine the Plan Change under the RMA, including as to the assessment of environmental effects, and that the applicant has failed to adequately assess the relevant objectives and policies under the Christchurch District Plan and higher order planning instruments, including the National Policy Statement on Urban Development 2020, the National Policy Statement for Freshwater Management, and the National Policy Statement for Infrastructure 2025. Accordingly, the submitters' primary relief remains that PPC24 be declined in its entirety, and that the land retain its Rural Urban Fringe zoning.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Olivia **Last name:** Robertson

Organisation: JRCD Limited

On behalf of: NZ Transport Agency Waka Kotahi

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

see attached

The reasons for my / our submission are: (use additional pages if required)

see attached

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

see attached

Attached Documents

Name
Submission on Plan Change 24

Christchurch, Level 1, BNZ Centre,
120 Hereford Street
PO Box 1479, Christchurch 8022, New Zealand

New Zealand
www.nzta.govt.nz

NZ Transport Agency Waka Kotahi Reference: 2026-0979

28 August 2026

Christchurch City Council
C/- Glenda Dixon
PO Box 73012,
Christchurch 8154

Via email: Glenda.Dixon@ccc.govt.nz

Dear Glenda,

Submission on Proposed Private Plan Change 24 – Johns Road Industrial

Attached is the NZ Transport Agency Waka Kotahi (NZTA) submission on Proposed Private Plan Change 24 – Johns Road Industrial, lodged by JRCD Limited, to rezone approximately 19 hectares of land at 370-448 Johns Road (State Highway 1).

We welcome the opportunity to discuss the contents of our submission with the relevant council officers as required.

If you have any questions, please contact me.

Yours sincerely,



Olivia Robertson
Consultant Planner – Poutiaki Taiao / Environmental Planning, Planning & Development
Infrastructure Development & Delivery

Phone: 0204 075 1368
Email: Olivia.Robertson@nzta.govt.nz

CC: JRCD Limited
C/- Georgia Brown, Novo Group Limited
PO Box 365
Christchurch 8140

Via email: georgia@novogroup.co.nz

NZ TRANSPORT AGENCY
WAKA KOTAHI

FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991

Submission on Proposed Private Plan Change 24 – Johns Road Industrial – JCRD Limited

To: Christchurch City Council
Glenda Dixon
Senior Policy Planner
PO Box 73012,
Christchurch 8154

Via email: Glenda.Dixon@ccc.govt.nz

From: NZ Transport Agency Waka Kotahi
Level 1, BNZ Centre,
120 Hereford Street
PO Box 1479, Christchurch 8022

1. This is a submission on the following:

1.1. Proposed Private Plan Change 24, which seeks to amend the Christchurch District Plan to rezone approximately 19 hectares of land located at 370-448 Johns Road from Rural Urban Fringe Zone (RuUFZ) to Industrial General Zone (IGZ).

2. NZ Transport Agency Waka Kotahi (NZTA) could not gain an advantage in trade competition through this submission.

3. Role of NZTA

3.1. NZTA is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Roading Powers Act 1989. The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

3.2. An integrated approach to transport planning, funding and delivery is taken by NZTA. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

4. State highway environment and context

4.1. State highways are physical resources of local and national importance and as such, compromising the safe, effective and efficient operation would be contrary to several objectives and policies of the Christchurch District Plan and the Canterbury Regional Policy Statement.

4.2. The proposed plan change seeks to rezone approximately 19 ha of land to Industrial General Zone and provide access via Johns Road (State Highway 1). State Highway 1 performs a critical strategic movement and freight function within the Christchurch transport network and is identified as a Transit Corridor under the One Network Framework. Transit Corridors are intended to facilitate the efficient movement of people and goods and therefore generally require a high degree of access management.

4.3. NZTA also notes that this section of Johns Road/State Highway 1 is a Limited Access Road. However, the proposal seeks to utilise and upgrade an existing legal road corridor (paper road) through the site for access to Johns Road, which limits NZTA's ability to rely on access management mechanisms that might otherwise be available to restrict or prevent new access arrangements directly from private property. This section of state highway being a Limited Access Road reinforces the importance of ensuring that any access provided is compatible with the long-term safe and efficient operation of the state highway network.

5. The submission of NZTA is:

5.1. NZTA **opposes** Proposed Private Plan Change 24 (the plan change) to the extent outlined in this submission.

5.2. NZTA has reviewed the application package for the plan change, including the Integrated Transport Assessment (ITA) and further information responses prepared by Novo Group, and the supporting modelling undertaken by Quality Transport Planning (QTP), and makes the following comments to support this position:

Additional Demand on a Constrained Network

5.3. The plan change seeks to amend the Christchurch City District Plan by rezoning the application site from Rural Urban Fringe Zone (RuUFZ) to Industrial General Zone (IGZ). This zone provides for minimum allotments of 500 square metres. Based on the developable area within the plan change site, the proposed rezoning will provide for the establishment of approximately 200 new industrial lots.

5.4. NZTA acknowledges the applicant's assessment that the proposal is forecast to generate approximately 176 vehicle trips per hour (two-way) during the AM and PM peak hours, including approximately 29-32 heavy vehicle trips. While the applicant compares this with the theoretical traffic generation permitted under the existing zoning, the proposal would nevertheless enable a material increase in traffic demand and industrial vehicle activity accessing Johns Road, including heavy vehicle movements. NZTA notes that the ITA identifies existing operational constraints at the Johns Road/Sawyers Arms Road roundabout and that the proposal is forecast to further increase delay at key intersections on the state highway network.

5.5. NZTA is concerned that the proposal would introduce additional demand onto a section of the strategic transport network that is already constrained and where future traffic growth is anticipated. The Christchurch Assignment and Simulation Traffic (CAST) modelling indicates increased delay at both the Johns Road/Sawyers Arms Road and Johns Road/Clearwater Avenue roundabouts, with QTP describing the effect at Sawyers Arms Road as moderate but significant.

- In the 2038 AM peak, CAST predicts delay on the Johns Road southbound approach at the Sawyers Arms Road roundabout would increase from approximately 4 minutes 25 seconds to 4 minutes 45 seconds.
- In the 2038 PM peak, CAST predicts delay on the SH1 northbound approach at the Clearwater Avenue roundabout would increase from approximately 34 seconds to 52 seconds, with the degree of saturation increasing from 97% to 100%. This represents a deterioration from Level of Service D to Level of Service E.
- QTP's SIDRA cross-check also identifies potentially greater effects at the Sawyers Arms Road roundabout, with delay increases of up to 45 seconds in the AM peak and 60 seconds in the PM peak on approaches already experiencing significant congestion.

5.6. NZTA does not agree that the significance of these effects should be discounted solely by expressing the additional delay as a proportion of an assumed total journey time. Rather, the effects should be considered in the context of the existing performance of the affected intersections, cumulative traffic growth on the corridor and the long-term strategic movement function of State Highway 1.

Modelling Uncertainty

5.7. NZTA notes that the CAST and SIDRA assessments produce materially different estimates of the effects of the proposal. While both modelling approaches indicate deterioration in performance at key intersections, the magnitude of the modelled effects varies considerably between the two models. QTP acknowledges that modelled performance becomes highly sensitive to relatively small changes in estimated capacity when intersections are operating close to capacity. NZTA considers that this discrepancy introduces uncertainty regarding the precise scale of the transport effects.

5.8. The assessment has been undertaken using CAST v23, which was the current version at the time of modelling. NZTA understands that multiple subsequent updates to the CAST model have occurred, including revised growth projections, updated census data and additional validation. As a result, there is additional uncertainty as to whether the modelling fully reflects the most current understanding of future travel demand and network performance on the State Highway 1 Johns Road corridor.

5.9. However, both modelling approaches identify adverse operational effects and, given the existing constraints on the State Highway 1 corridor and the sensitivity of network performance under congested conditions, NZTA considers it appropriate to adopt a cautious interpretation of the modelling outcomes. In this regard, NZTA places greater weight on the more conservative SIDRA results, which indicate more pronounced delays and operational effects at the Clearwater and Sawyers Arms roundabouts.

Access and Network Integration

5.10. NZTA acknowledges that the proposal would consolidate two existing accesses into a single access point and remove direct accesses from 370 and 390 Johns Road. While access consolidation is generally positive from an access management perspective, the proposal would replace several low-volume rural residential accesses with a single industrial access serving substantially greater traffic volumes associated with industrial activities.

5.11. NZTA has concerns regarding the proposed access intersection to the site on Johns Road, which is situated in close proximity to both the existing Greywacke Road left-in/left-out intersection and the Clearwater Avenue roundabout. The ITA acknowledges that accommodating the proposed deceleration lane may require shortening of the Greywacke Road acceleration lane and merge taper, or result in overlap between merge and diverge manoeuvres. While the applicant suggests that an appropriate design may ultimately be achievable, no detailed assessment has been provided to demonstrate that suitable acceleration lane, deceleration lane, taper and separation requirements can be accommodated within the available corridor while maintaining the safe and efficient operation of Johns Road and the wider state highway corridor.

5.12. NZTA further notes that the existing Greywacke Road auxiliary lane arrangements form part of the current operating environment on Johns Road and may have originally been designed for a higher-speed corridor than the current 80 km/h environment. Any reduction in the length of these facilities to accommodate a new industrial access could reduce merging opportunities for vehicles entering Johns Road and affect the efficiency and safety of traffic operations. Compromising the existing auxiliary lane arrangements also has the potential to limit future options for managing and improving the state highway corridor, particularly should future network requirements warrant changes to operating speeds, intersection layouts or other corridor improvements.

5.13. This is of particular relevance given the existing operational constraints identified on this section of State Highway 1, and the fact that there are currently no funded or planned projects to address the current operating conditions on the corridor.

Safety Effects

5.14. While the posted speed limit of Johns Road is 80km/hr, NZTA notes that the 85th percentile speed for northbound traffic along this section of road is 89km/hr, based on TomTom reporting for the preceding three months. NZTA mapping also identifies the collective risk as 'medium' along this corridor section.

5.15. The proposed intersection does not effectively fit into the space available, when accounting for the required deceleration and acceleration lanes:

- The left-in deceleration lane would be required to either overlap or butt up to the Greywacke Road left-out acceleration lane, which results in confusing road layout and increases the risk of crashes. Given the speed limit and known actual operating speed (as set out above), any crash is likely to occur above safe system survivability limits and may result in an increase to deaths and serious injuries (DSI).

- NZTA also notes the presence of an existing access approximately 230 metres along the Greywacke Road acceleration lane, which further complicates the design environment and may limit the ability to accommodate an additional access while maintaining appropriate state highway performance.

- The left-out acceleration lane would create a merge at a point where most vehicles are starting to decelerate for the Clearwater Avenue roundabout, likely resulting speed differentials, increasing crash risk of merge/side swipe crashes, loss of control, and loss of control at the roundabout. A shorter lane would still result in differential merge speeds, and would remain likely to result in crashes, particularly for heavy vehicles.

- When considering that any vehicles, including heavy vehicles, wanting to travel south will need to perform a U-turn at the Clearwater Avenue roundabout to enter the southbound traffic lane, the safety risk increases further. There is insufficient space for vehicles to exit the acceleration lane and also cross over the left-hand traffic lane to be able to make a U-turn from the right-hand lane.

5.16. Notwithstanding the adverse safety effects anticipated by the proposed development, increased crash frequency also results in increased delays for road users, and increased social and maintenance costs, all of which contribute to a reduction in the safe, effective, and efficient operation of the state highway network.

5.17. This is also the case for vehicles approaching from the north, who will be required to perform a U-turn at the Sawyers Road roundabout to enter the northbound traffic lane prior to turning into the proposed industrial area. While it is acknowledged that there is more distance available for lane changes both entering and exiting this roundabout, the collective risk for this intersection is 'high', and as such, the additional demand generated will further increase crash risk, and result in the further diminishing performance of an intersection which is known to be over-capacity.

Strategic Planning

5.18. The Greater Christchurch Spatial Plan was prepared by the Greater Christchurch Partners, comprising Environment Canterbury, Christchurch City Council, Selwyn and Waimakariri District Councils, mana whenua, Te Whatu Ora – Waitaha, and NZTA, and the Crown.

5.19. It was adopted by all Partner Councils in March 2024 as their Future Development Strategy (FDS), satisfying the requirements of the National Policy Statement for Urban Development. This FDS sets out how well-functioning urban environments will be achieved, and how sufficient housing and business development capacity will be provided to meet expected demand over the next 30 years.

5.20. The FDS has assessed the need for business capacity for the next 30 years, as informed by a Housing and Business Development Capacity Assessment (HBA). The results of this have found that Greater Christchurch is well placed to meet the projected demands for commercial and industrial land over the next 10 years, and for industrial land over the next 30 years and beyond. More specifically, more than enough industrial land is available in Christchurch, Selwyn and Waimakariri, to meet demand of the next 30 years, which a particularly significant surplus in Christchurch (627 hectares over the next 10 years, and 544 hectares over the next 30 years). The FDS also assumes that demand for industrial land will decline in the long term due to global economic trends, and as such, the total supply of industrial land in Greater Christchurch may never be fully utilised.

5.21. Where new or expanded industrial areas are identified in the FDS, these are located south of Christchurch International Airport, around Southbrook in Rangiora, in Hornby South, and around the existing Rolleston industrial area, on the northern side of State Highway 1 and the railway line. The site proposed to be rezoned by this plan change application is not identified within any future industrial area, and given the surplus in industrial land identified above, is not required to address any capacity issues.

5.22. The FDS also identifies that urban development should be carefully managed around strategic infrastructure to safeguard the effective operation, maintenance and potential for upgrades of this infrastructure. As set out above, this section of State Highway 1 is a critical strategic freight route and should be prioritised for traffic and freight movement. The proposal to directly access an industrial development is inconsistent with the intended function of the strategic road network and will result in increased demand on State Highway 1.

6. NZTA seeks the following decision from the local authority:

6.1. That the proposed plan change is **declined**, for the reasons set out above, and summarised as follows:

- The proposed rezoning will result in adverse effects on the safe, effective, and efficient operation of the strategic transport network, through an increase in traffic generation along a section of state highway identified as a transit corridor and forming part of the strategic freight route.
- The proposed access and intersection arrangements will conflict with the existing road and intersection layout and operating speeds of the road corridor, increasing crash risk and DSIs, and reducing the performance of intersections that are already identified as being over-capacity and operating at a reducing level of service.
- The proposed rezoning is inconsistent with the recently developed Greater Christchurch FDS, noting the surplus of existing industrial land within the Christchurch area and the location of the site in relation to the areas identified for new or expanded industrial development.

7. NZTA <u>does</u> wish to be heard in support of this submission.

8. If others make a similar submission, NZTA will consider presenting a joint case with them at the hearing.

Signature:



Stuart Pearson
Principal Planner – Poutiaki Taiao / Environmental Planning, Planning & Development
Infrastructure Development & Delivery
Pursuant to an authority delegated by NZ Transport Agency Waka Kotahi

Date: 28 August 2026

Address for service: NZ Transport Agency Waka Kotahi
Level 1, BNZ Centre,
120 Hereford Street
PO Box 1479, Christchurch 8022

Contact Person: Olivia Robertson, Consultant Planner
Telephone Number: 0204 075 1368
Email: Olivia.Robertson@nzta.govt.nz

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Stacey **Last name:** Walker

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

I am writing to oppose PPC24 until the speed limit along the full length of Gardiners Road is reduced to a consistent 50km/h between Johns Road and Sawyers Arms Road. At present, the road operates under a combination of 50km/h and 60km/h speed limits, which creates inconsistency and does not adequately address the impacts on nearby residents.

Our property [14 Eleanor Lane} backs directly onto Gardiners Road. While we acknowledge that Gardiners Road is identified as a Collector Road within the Christchurch City Council transport network, the current speed environment generates significant noise and vibration effects. In particular, heavy vehicles and trucks frequently appear to travel above the posted speed limit, often at speeds estimated to be between 65km/h and 70km/h.

The combination of vehicle speed, vehicle weight, and traffic volume creates noticeable vibration impacts on our property. It is common for the vibration caused by passing trucks to be sufficient for glasses and other items in our kitchen to visibly vibrate. These effects have a material impact on our enjoyment of our home and support the need for a continuous 50km/h speed limit along the entire section of Gardiners Road before PPC24 proceeds.

Ideally, we would prefer PPC24 not to proceed and for the speed limit on Gardiners Road to be reduced to 40km/h. However, we recognise that growth and development need to be balanced with the interests of the wider community. At a minimum, we strongly believe that a continuous 50km/h speed limit should be implemented between Johns Road and Sawyers Arms Road before any further development is approved.

We would welcome the opportunity to speak to our submission and discuss these concerns further at any hearing or meeting relating to PPC24.

The reasons for my / our submission are: (use additional pages if required)

as above

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

as above

Attached Documents

Name
Stacey Walker Submission PC 24

Jackson, Andrew

From:	Duty – City Planning
Sent:	Friday, 28 August 2026 2:17 pm
To:	SPPC Business Support
Cc:	Dixon, Glenda
Subject:	FW: Opposition to PPC24

From: Stacey Walker <walker.stacey@hotmail.co.nz>
Sent: Friday, 28 August 2026 1:55 pm
To: Duty – City Planning <PlanChange@ccc.govt.nz>
Cc: Nick Shaw <nickshawbuilders@gmail.com>
Subject: Opposition to PPC24

You don't often get email from walker.stacey@hotmail.co.nz. Learn why this is important

Good Afternoon

I am writing to oppose PPC24 until the speed limit along the full length of Gardiners Road is reduced to a consistent 50km/h between Johns Road and Sawyers Arms Road. At present, the road operates under a combination of 50km/h and 60km/h speed limits, which creates inconsistency and does not adequately address the impacts on nearby residents.

Our property [14 Eleanor Lane} backs directly onto Gardiners Road. While we acknowledge that Gardiners Road is identified as a Collector Road within the Christchurch City Council transport network, the current speed environment generates significant noise and vibration effects. In particular, heavy vehicles and trucks frequently appear to travel above the posted speed limit, often at speeds estimated to be between 65km/h and 70km/h.

The combination of vehicle speed, vehicle weight, and traffic volume creates noticeable vibration impacts on our property. It is common for the vibration caused by passing trucks to be sufficient for glasses and other items in our kitchen to visibly vibrate. These effects have a material impact on our enjoyment of our home and support the need for a continuous 50km/h speed limit along the entire section of Gardiners Road before PPC24 proceeds.

Ideally, we would prefer PPC24 not to proceed and for the speed limit on Gardiners Road to be reduced to 40km/h. However, we recognise that growth and development need to be balanced with the interests of the wider community. At a minimum, we strongly believe that a continuous 50km/h speed limit should be implemented between Johns Road and Sawyers Arms Road before any further development is approved.

We would welcome the opportunity to speak to our submission and discuss these concerns further at any hearing or meeting relating to PPC24.

Thanks

Stacey
0276295252

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Mark **Last name:** Willis

Organisation: Willowbank Wildlife Reserve

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Rezoning the site from Rural Urban Fringe (RuUF) to Industrial General (IG).

The reasons for my / our submission are: (use additional pages if required)

This land surrounds valuable recreational areas and conservation estates. Such areas are community assets that require sympathetic and complimentary surrounds in order to achieve their full value for our society. They are important to our community as we strive not only to have appropriate recreational areas, but also to create a city that not only celebrates but lives sustainable values. Surrounding them with light commercial property will impact the ability of these areas of land to deliver their objectives to our community.

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

The land remains rural urban fringe.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 28/08/2026

First name: Amanda **Last name:** Thompson

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

see attached

The reasons for my / our submission are: (use additional pages if required)

see attached

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

see attached

Attached Documents

Name
CCC - PC24- Johns Road Industrial Plan Change Plan Change - Submission

Environment Canterbury
Regional Council
Kaunihera Taiao ki Waitaha

Customer Services
P. 03 353 9007 or 0800 324 636
200 Tuam Street
PO Box 345
Christchurch 8140
www.ecan.govt.nz/contact

4 September 2026

Christchurch City Council
Strategy, Planning and Regulatory
53 Hereford Street
Christchurch 8140

Attention: Glenda Dixon

By email: planchange@ccc.govt.nz

Dear Glenda,

Canterbury Regional Council submission on Private Plan Change 24 – Johns Road Industrial

Canterbury Regional Council (**CRC**) submitted on the Private Plan Change 24 (**PC24**) on Friday 28 August 2026. PC24 is an application by JRCD Limited to rezone land at 370-470 Johns Road from Rural Urban Fringe to Industrial General.

It has been identified that there is an error in CRC's submission and we would like to formally correct this.

In the submission, CRC stated that a portion of the site was Land Use Class (**LUC**) 2 and therefore potentially Highly Productive Land (**HPL**) and versatile soils under the relevant planning frameworks. This was incorrect. The site is not identified as HPL under the National Policy Statement for Highly Productive Land or as versatile soils under the Canterbury Regional Policy Statement (**CRPS**). CRC therefore withdraws the references to HPL and versatile soils in the submission, including the associated conclusions and relief sought.

For clarity, the site does not raise the HPL or versatile soils issues identified in the submission, and the proposed rezoning is not inconsistent with the relevant CRPS provisions relating to versatile soils on that basis nor is the NPS-HPL relevant to the proposal. CRC does not seek any relief in relation to HPL or versatile soils.

CRC requests that this letter and the **attached** amended submission serves as notice of correction of CRC's submission and withdrawal of the above references and for both to be made available to the applicant and all interested parties for PC24. CRC is not seeking to introduce any new matter or alter its other submission points.

CRC apologises for the error and any inconvenience caused.

Yours sincerely,



James Ling
Senior Planner, Strategy and Planning

Notice of Submission on Private Plan Change 24 – Christchurch City Council

Submission made by electronic means

1. SUBMITTER DETAILS

Name of Submitter: Canterbury Regional Council

Physical Address: 200 Tuam Street

Postal Address: PO Box 345

Email Address: regional.planning@ecan.govt.nz

Telephone: 027 358 9769

My Address for service for receiving documents and communication about this application is: by email

2. APPLICATION DETAILS

Application Reference Number: Johns Road Industrial Plan Change 24

Name of Applicant: JRCD Limited

Application Site Address: 370-448 Johns Road, Harewood, Christchurch

Description of the Proposed Activity:

This proposed private plan change requests a rezoning of approximately 19 ha of Rural Urban Fringe (**RuUF**) zoned land to Industrial General (**IG**) zone. The site is located at 370-448 Johns Road (State Highway 1) on the northern side of the road, between Greywacke Road to the west and Clearwater Avenue to the east. The request also includes a proposed Industrial General Zone (Johns Road) Outline Development Plan (**ODP**) to be inserted into the District Plan at Appendix 16.8, Area- specific rules – Industrial General Zone (Johns Road) to be inserted into Rule 16.4, and new Matters of discretion.

3. SUBMISSION DETAILS

This is a submission on Private Plan Change 24 to the Christchurch District Plan.

We submit a generally neutral submission but oppose the provision that would enable heavy industrial activities as permitted activities. CRC seeks amendments to the proposed provisions to ensure that the effects of the IG zoning are appropriately managed.

Canterbury Regional Council (**CRC**) could not gain an advantage in trade competition through this submission.

The reasons for our submission are:

Enabling industrial heavy activities as a permitted activity

3.1. The proposed Rule 16.4.X.X.X P1 currently provides for activities listed in Rule 16.5.1.1 P1–P18. This appears to be a drafting error carried over from an earlier version which sought to rezone the site to Industrial Heavy (**IH**). The current plan change seeks to rezone the site to IG, and the proposed permitted activity provision should therefore refer to the relevant IG activity list.

3.2. The s32 Report does not discuss or assess the proposal as enabling heavy industrial activities as permitted activities. This provides further indication that the reference to Rule 16.5.1.1 P1–P18 is erroneous rather than an intentional part of the current IG proposal. Nevertheless, as currently drafted, the provision could enable a different and potentially more intensive range of activities than has been assessed through the plan change. CRC considers that the provision must therefore be corrected.

3.3. If the reference is intended to enable heavy industrial activities as permitted activities, CRC opposes that outcome. Such activities have not been sufficiently assessed through the plan change process and could introduce greater risks to groundwater, Hedges Waterway, and downstream receiving environments than the proposed IG zoning. CRC is not satisfied that the site would be suitable for heavy industrial activities under the current plan settings.

Adverse Effects on Freshwater Quality

3.4. CRC's primary concern is the potential effect of the change from RuUF to IG on groundwater and surface water quality. Objective 7.2.3 of the Canterbury Regional Policy Statement (**CRPS**) seeks that overall freshwater quality is maintained or improved, while Policies 7.3.6 and 7.3.7 require activities and changes in land use to be managed so that water quality standards are maintained or improved.

3.5. Activities within the IG zone could generate contaminants that enter groundwater or surface water if not appropriately managed. Groundwater beneath the site is likely to be shallow, potentially around 1 m below ground level in lower parts of the site during periods of high groundwater. Groundwater is generally expected to flow eastwards, although local flow paths towards Hedges Waterway are possible. Groundwater beneath the site is also likely to ultimately discharge to the Styx River system.

3.6. This creates a potential pathway between activities on the site and sensitive downstream receiving environments. Depending on the activities undertaken, potential contaminants could include nutrients, metals, hydrocarbons and PFAS. CRC considers that these risks should be recognised in the plan change framework rather than relying solely on controls at the individual development stage.

3.7. Site-specific information on groundwater levels and flow paths is needed to inform the design and assessment of stormwater disposal to ground. CRC seeks that site-specific groundwater monitoring is undertaken before detailed stormwater design is finalised, including assessment of groundwater levels and likely flow directions across the site. Monitoring during a period of seasonally high groundwater should be undertaken where practicable to ensure the stormwater system is designed having regard to the period of greatest groundwater vulnerability.

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3.8. The groundwater assessment should also consider potential effects on Hedges Waterway and registered domestic and community drinking water wells in the wider area, including those in the downgradient direction. CRC seeks that these wells are identified and that potential effects from stormwater disposal to ground are assessed.

3.9. The Infrastructure Report[1] proposes stormwater disposal to ground. Given the shallow groundwater, there may be limited opportunity for treatment in the soil profile before contaminants reach groundwater. CRC therefore considers that stormwater treatment prior to infiltration will be important where necessary to protect groundwater and connected surface water environments. The detailed treatment solution can be determined through subdivision and development consenting, but the plan change should establish the required outcome.

3.10. CRC therefore seeks that the ODP and associated provisions require the stormwater management approach to be informed by site-specific groundwater information and to provide for treatment of stormwater prior to infiltration where necessary to manage risks to groundwater, Hedges Waterway, and connected receiving environments.

3.11. The plan change should also recognise that contaminants entering groundwater may reach Hedges Waterway or other spring-fed waterways. Accordingly, the site-specific groundwater and hydrological assessment should consider potential hydraulic connections with Hedges Waterway and other receiving environments, as well as potential effects on registered domestic and community drinking water wells in the wider area, including downgradient wells.

Surface Waterbodies and Aquatic Ecology

3.12. Hedges Waterway is adjacent to the site and includes spring-fed headwaters and the main channel. CRC generally agrees with the conclusions and recommendations of the Aquatic Ecology Assessment[2]. The assessment identifies a minimum 20 m setback from the top of the terrace adjacent to the headwaters and main channel, with no buildings, roads, or other impervious surfaces within the setback. This has been incorporated into the proposed built form standards and ODP.

3.13. The proposed riparian planting requirement does not, in CRC's view, provide sufficient certainty that the full setback will function as a protective vegetated buffer between industrial activity and Hedges Waterway. CRC seeks that the 20 m setback be managed as a riparian buffer with continuous indigenous planting and ecological enhancement, subject only to infrastructure specifically provided for in the ODP.

3.14. The Aquatic Ecology Assessment also recommends improvement of the culvert within the 370 Johns Road land parcel to improve fish passage, together with assessment of downstream reaches to identify other fish passage barriers between the site, South Boundary Creek and Ōtukaikino Creek. These matters have not been addressed in the current plan change. It is noted that such structures are managed by both the National Environmental Standards for Freshwater (**NES-F**) and the Canterbury Land and Water Regional Plan (**LWRP**).

3.15. CRC considers that these matters should be addressed through the plan change because the current proposal does not include the recommended waterway works

[1] Appendix F to the s32 report.
[2] Appendix E to the s32 report.

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and subsequent subdivision or development consenting may not otherwise provide a mechanism to achieve this.

3.16. The updated wetland assessment[3] confirms the presence of a natural inland wetland within the riparian margins of Hedges Waterway on the true right bank of the lower reach and is therefore subject to the regulatory framework of the National Policy Statement for Freshwater Management 2020 (**NPS-FM**) and NES-F.

3.17. The CRPS also provides specific direction for wetlands. Policy 9.3.5 requires ecologically significant wetlands to be assessed against the matters in Policy 9.3.1 and the national priorities in Policy 9.3.2, protected where significant, and promotes the protection, enhancement and restoration of all remaining wetlands. Policy 9.3.2 identifies indigenous vegetation associated with wetlands and habitats of threatened and at-risk indigenous species as priorities for protection

3.18. The updated wetland assessment does not appear to assess the confirmed wetland against the CRPS significance criteria. The assessment of the wetland as having "low" ecological value under the EIANZ ecological impact assessment guidelines does not, on its own, establish whether the wetland meets the CRPS criteria for ecological significance. CRC therefore considers that the significance of the wetland should be confirmed against the CRPS framework before its effects are assessed as being appropriately managed.

3.19. The NPS-FM requires the loss of extent of natural inland wetlands to be avoided, their values protected, and their restoration promoted, subject to the limited exceptions provided for in the NPS-FM. The NES-F also places specific controls on activities within and near natural inland wetlands. For urban development, vegetation clearance and earthworks within, or within 10 m of, a natural inland wetland are regulated under the NES-F. Earthworks outside 10 m but within 100 m are also regulated where they result, or are likely to result, in complete or partial drainage of the wetland. Activities affecting water within 100 m are regulated where there is a hydrological connection and the activity is likely to change the wetland's water level range or hydrological function.

3.20. The wetland assessment recommends avoiding works or vegetation loss within 10 m of the wetland margin and requiring an appropriate erosion and sediment control plan for earthworks within 100 m. These recommendations have not been clearly carried through into the proposed PC24 provisions. The current provisions provide a 20 m building setback from Hedges Waterway and a 10 m planted setback, but do not clearly identify the confirmed natural inland wetland or establish the 10 m wetland margin as a separate protection requirement.

3.21. CRC therefore seeks that the confirmed wetland extent is identified on the ODP and that the plan change provisions distinguish the wetland protection requirements from the 20 m Hedges Waterway setback. The wetland itself should be protected from development and vegetation clearance, and a minimum 10 m setback from the delineated wetland margin should be maintained free of works and vegetation clearance, except where otherwise authorised under the applicable NES-F framework. Where wetland restoration or enhancement is identified as appropriate through the wetland assessment, the ODP should also provide for that restoration or enhancement.

[3] Appendix E(i) to the s32 report.

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Terrestrial biodiversity

3.22. Objective 9.2.1 of the CRPS requires that the decline in Canterbury's ecosystems and indigenous biodiversity is halted and their life-supporting capacity and mauri safeguarded. Objective 9.2.2 promotes restoration and enhancement, while Objective 9.2.3 requires significant indigenous vegetation and significant habitats of indigenous fauna to be identified and protected. Policy 9.3.2 identifies indigenous vegetation associated with wetlands and habitats of threatened and at-risk indigenous species as priorities for protection.

3.23. The updated assessment found that most of the assessed land outside the riparian wetland is pasture dominated by exotic species and qualifies as Improved Pasture under the applicable wetland assessment methodology. On that basis, there is limited evidence of significant terrestrial biodiversity values across the wider site. However, the confirmed riparian wetland contains indigenous hydrophytic vegetation and forms part of the Hedges Waterway corridor. Its value should therefore not be considered in isolation from the waterway and associated riparian habitat.

3.24. CRC considers that the riparian planting proposed by PC24 should be secured as ecological enhancement rather than treated only as landscape planting. The current provisions require planting within the 10 m landscaped setback, but do not clearly require the planting to be established and maintained as a functioning riparian habitat. The provisions should therefore require locally appropriate, eco-sourced indigenous species, including wetland-tolerant species on the true right bank wetland, and provide for ongoing maintenance.

3.25. The updated assessment also recommends avoiding vegetation loss within 10 m of the wetland margin and provides for ecological assessment if that approach cannot be achieved. CRC considers this should be reflected directly in the plan change provisions, rather than relying entirely on subsequent consenting to identify the wetland setback.

3.26. Artificial lighting should also be designed to minimise effects on Hedges Waterway and its riparian habitat. The ecological assessment recommends that lighting be directed away from the waterway. CRC considers that this should be reflected in the ODP or built form provisions.

Out of sequence development

3.27. Objective 6.2.1 in the Canterbury Regional Policy Statement (**CRPS**) sets out a recovery framework for Greater Christchurch. Of specific relevance to the proposal, the objective requires that urban development outside existing urban areas or greenfield priority areas be avoided, that strategic and other infrastructure services are integrated with land use development, and that land use optimises the use of existing infrastructure. Policy 6.3.1 implements this objective by requiring that new urban activities only occur within existing urban areas or identified greenfield priority areas, as shown on Map A.

3.28. The development site is not identified as an existing urban area, a *Future Development Area*, or *greenfield priority area* in Map A of the CRPS, and in this way is inconsistent with Objective 6.2.1 and Policy 6.3.1. However, the proposal is largely consistent with the other aspects of Chapter 6. The rezoning of the site would be a logical extension of the existing urban area as it proposes to amend an existing ODP. The location of the site would also enable existing three waters and transport infrastructure to be utilised.

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3.29. CRC acknowledges that Policy 8 of the National Policy Statement on Urban Development (**NPS-UD**) provides a pathway for plan changes which are unanticipated by RMA planning documents or out-of-sequence with planned land release. The policy requires Local Authorities to be responsive to plan changes affecting urban environments that would add significantly to development capacity and contribute to well-functioning urban environments.

3.30. What amounts to a significant addition to development capacity is not defined in the NPS-UD and has not been formally established. The s32 report asserts that the addition of 59,500m^2 of industrial floorspace, would add significantly to development capacity in the locality and Christchurch itself. The question remains as to whether the locality is an appropriate level of granularity for an assessment of whether this is a significant addition to development capacity. Whether the proposal satisfies the significance threshold in Policy 8 is a critical consideration in assessing whether this pathway can be relied upon.

The presence of contaminated or potentially contaminated land

3.31. Objective 17.2.1 of the CRPS seeks to protect people and the environment from adverse effects of contaminated land. Policy 17.3.2 requires that where new subdivision, use or development of actually or potentially contaminated land is proposed, a site investigation is undertaken to determine the nature and extent of contamination.

3.32. The contaminated land investigation generally follows industry standards and provides an appropriate initial assessment of historical HAIL activities and potential contaminants. No concentrations above the relevant commercial / industrial guidelines were identified, although further sampling has been recommended.

3.33. CRC considers the information available is sufficient for consideration of the plan change. Further investigation, management and remediation can be addressed through the subsequent subdivision and development consenting processes.

3.34. While the proposed IG zoning reduces the potential risk compared with IH zoning, it does not prevent the establishment of new activities that could create HAIL sites. CRC therefore considers that appropriate industry-specific management measures will remain important to prevent new sources of contamination from being established and to protect soil and groundwater.

Management of Natural Hazards

3.35. Objective 11.2.1 of the CRPS seeks to avoid new subdivision, use and development of land that increases risks associated with natural hazards. Policy 11.3.1 implements this objective by requiring the avoidance of development in high hazard areas. Policy 11.3.5 of the CRPS sets out a general risk management approach, requiring that natural hazard risks be identified, assessed and appropriately managed.

3.36. CRC agrees with the Flooding Memo[4] conclusions. The site is outside of the secondary banks, putting flood risk on par with anywhere else in Christchurch. CRC considers the site is outside of high hazard areas and is consistent with the identified provisions.

[4] Appendix A to the s32 report.

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Regional Council Responsibilities

3.37. Resource consents from CRC may be required for the development and operation of the site under the LWRP and the Cantebury Air Regional Plan (**CARP**).

3.38. Based on the information currently available, resource consent may be required for the following activities:

a. Earthworks and vegetation clearance;

b. Discharge of construction-phase stormwater (if not otherwise authorised by CCC's global consent), dewatering water, and/or flocculants if used;

c. Take of groundwater for dewatering; and

d. The discharge of dust to air.

3.39. Further to this, the provisions of the NES-F will apply to works that may affect the identified natural inland wetland and/or fish passage.

3.40. This list is indicative only and is not exhaustive. The applicant will need to undertake their own assessment if the private plan change is approved.

The decision we would like the Council to make is:

3.41. CRC requests that the concerns identified above are addressed. In summary, the key concerns are:

a. Heavy industrial activities: The apparent drafting error that would enable heavy industrial activities as permitted activities despite the proposal seeking IG zoning and the absence of an assessment of those activities in the s32 report.

b. Freshwater: The potential effects of the proposed land use on groundwater and surface water quality and hydrology, including the management of shallow groundwater and stormwater disposal to ground.

c. Wetlands and aquatic ecology: The protection and ecological and hydrological functioning of the natural inland wetland and Hedges Waterway, including riparian enhancement and fish passage.

d. Out of sequence development: Whether the proposal satisfies the requirements of Policy 8 of the NPS-UD and whether the additional development capacity can properly be considered significant at the relevant spatial scale.

3.46. CRC seeks the following relief:

a. Amend the ODP:

i. to identify the delineated extent of the natural inland wetland and a minimum 10m setback from the wetland margin; and

ii. to identify a 20m riparian planting buffer adjacent to Hedges Waterway.

b. Amend 16.4.X.X.X Area-specific Permitted activities to ensure that the permitted activity list applies to the proposed IG zone and does not inadvertently enable heavy industrial activities and to specify the riparian planting and buffer requirements to Hedges Waterway and the identified natural inland wetland:

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	Activity	*Activity specific standards*
P1	*Activities listed in Rule ~~16.5.1.1 P1-P18~~ **16.4.1.1 P1-P22***	*a. Development shall comply with:* *i. All of the key structuring elements of the Johns Road Outline Development Plan (Appendix XX), including:* *A. Access entry upgrade.* *B. Internal road connection.* *C. Stormwater management Area (sizing and location indicative).* *D. ~~Riparian buffer planting~~ **A minimum 20 m riparian buffer along Hedges Waterway, identified on the Outline Development Plan, with continuous indigenous riparian planting and ecological enhancement.*** ***E. A minimum 10 m setback from the delineated margin of the natural inland wetland identified on the Outline Development Plan, within which works and vegetation clearance are avoided except where authorised under the applicable NES-F framework.*** *ii. Built form standards in Rule ~~16.5.4.~~2 **16.4.X.X**, and Rule ~~16.5.6.2~~ **16.X.X** unless specified otherwise in Rule ~~16.5.4.2~~ **16.4.X.X**.*

c. Amend 17.4.X.X.X Area-specific Non-complying activities to add heavy industrial activities as a non-complying activity:

	Activity
NC4	***Heavy Industrial activity***

d. Amend Rule 16.4.X.X.X – Landscaped areas to replace ii. Sites with a boundary to Hedges Waterway to require the 20 m setback to function as a riparian and ecological buffer, including continuous locally appropriate, eco-sourced indigenous planting and ongoing maintenance, with wetland-tolerant species used within the identified wetland:

	Applicable to	*Standard*
ii	*Sites with a boundary to Hedges Waterway*	*a. The setback required under Rule 16.4.X.X (ii) must be landscaped for a depth of at least ~~1~~**2**0m extending from the banks of both sides of the waterway.* *b. Planting of trees and shrubs within the ~~1~~**2**0m landscaped setback shall be in accordance with the Landscape Plan and Plant Species List included as part of the outline development plan (see Appendix XX) and the requirements specified in Part A of Appendix 6.11.6 of Chapter 6. **Planting shall be selected having regard to the ecological characteristics of the riparian margin**; and* *c. There shall be no erection of buildings, fences, the display of outdoor advertisements, parking of vehicles or use for any purpose other than landscaping or ecological enhancement within the 20m building setback.*

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		d. The landscaping required under this rule shall be completed as a condition of subdivision consent, or if there is no subdivision required, in conjunction with development in the locations that clause (a) relates to as a permitted activity standard. *e. Existing vegetation within 10m of the area shown as wetland margin, depicted on the Outline Development Plan in Appendix XXX, shall be maintained.* ***f. Riparian planting shall be established and maintained so that it provides a continuous and functioning vegetated buffer between industrial activities and Hedges Waterway.***

e. Add the following area specific standards to 16.4.X.X Area-specific built form standards – Industrial General Zone (Johns Road):

16.4.X.X.X Stormwater Management

	Standard
a.	***Prior to approval of detailed operational stormwater design, site-specific groundwater monitoring shall be undertaken to establish groundwater levels across the site, including during seasonally high groundwater conditions where practicable.***
b.	***The assessment shall identify likely groundwater flow directions and potential local flow paths towards Hedges Waterway.***
c.	***The detailed stormwater management design shall have regard to the results of the groundwater assessment and shall demonstrate that the proposed disposal to ground will avoid or appropriately manage adverse effects on groundwater, Hedges Waterway, the natural inland wetland and downstream receiving environments.***
d.	***The assessment shall consider potential effects on registered domestic and community drinking water wells identified within the area potentially affected by groundwater flows from the site.***
e.	***Where required to avoid or minimise adverse effects on groundwater and connected surface water environments, stormwater discharged to ground shall be treated before infiltration. The level of treatment shall be appropriate to the nature of the proposed activities and the contaminants likely to be generated.***

16.4.X.X.X Lighting

	Standard
a.	***Artificial lighting within the Johns Road Outline Development Plan area shall be located, designed and directed to minimise light spill onto Hedges Waterway, its riparian margins and the natural inland wetland identified on the Outline Development Plan.***

f. Amend 16.7.3.X – Matters of control and discretion – Industrial General Zone (Johns Road) to include the following changes:

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16.7.3.X.X Outline development plan – Industrial General Zone (Johns Road)

e. The extent to which the proposal protects the extent and values of the natural inland wetland identified on the Outline Development Plan and maintains its hydrological functioning.

*16.7.3.X.X Landscaped area **– Industrial General Zone (Johns Road)***

*b. The extent to which the ecology and biodiversity of Hedges Waterway and the Natural Inland Wetland are maintained **and enhanced**.*

16.7.3.X.X Stormwater management – Industrial General Zone (Johns Road)

a. The extent to which stormwater disposal to ground is appropriately designed and managed having regard to:

i. site-specific groundwater levels and groundwater flow paths;

ii. the potential effects of stormwater disposal on Hedges Waterway, the natural inland wetland, and downstream receiving environments; and

iii. the need for treatment of stormwater prior to infiltration where necessary to avoid or minimise adverse effects on groundwater and connected surface water environments.

16.7.3.X.X Lighting – Industrial General Zone (Johns Road)

a. The extent to which lighting within the Johns Road Outline Development Plan area is located and directed to minimise light spill onto Hedges Waterway and the natural inland wetland.

4. SUBMISSION AT THE HEARING

We wish to be heard in support of our submission.

5. SIGNATURE



Amanda Thompson
Team Leader Planning & Strategy

Original submission dated 28/08/2026
Amended submission dated 4/09/2026

UNCLASSIFIED

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 31/08/2026

First name: Maree Barbara **Last name:** Hedges

Organisation: alexandra.lile@tp.co.nz

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

Yes

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

as attached

The reasons for my / our submission are: (use additional pages if required)

as attached

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

as attached

Attached Documents

Name
PC24 Submission - Maree Hedges

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION

Clause 6 of Schedule 1, Resource Management Act 1991

To: Christchurch City Council

Email: Glenda.Dixon@ccc.govt.nz

Name of Submitter:

1 Maree Barbara Hedges (the **Submitter**)

Physical Address: 444 and 448 Johns Road, Harewood

Address for Service: Tavendale and Partners

Level 3, Tavendale and Partners Centre
329 Durham Street North
P O Box 442
Christchurch 8140

Contact: Sam Chidgey I Alexandra Lile

Email: sam.chidgey@tp.co.nz I alexandra.lile@tp.co.nz

Trade competition

2 The Submitter could not gain an advantage in trade competition through this submission

☐ Yes ☒ No

3 If yes: I am directly affected by an effect of the subject matter of the submission that:

3.1 adversely affects the environment; and

3.2 does not relate to trade competition or the effects of trade competition.

☐ Yes ☐ No

Hearing options

4 Do you wish to be heard in support of your submission?

☒ Yes ☐ No

5 If others are making a similar submission would you consider presenting a joint case with them at the hearing?

☒ Yes ☐ No

6 This is a submission by Maree Barbara Hedges (the **Submitter**) on proposed: *Private Plan Change 24* (**PC24**) to the Operative - Christchurch District Plan (**Operative Plan**) requested by JRCD LIMITED (the **Applicant**) and notified by the Christchurch City Council (**CCC**) on 30 July 2026.

7 The submission relates to PC24 in **its entirety** which is **opposed** by the Submitter **in full.**

8 The Submitter's reasons for this submission are provided in **Appendix 1** below.

9 The Submitter seeks the following decisions from the CCC:

9.1 PC24 be rejected in its entirety; or

9.2 In the alternative, that the Applicant's request to re-zone the Submitter's land[1] from Rural Urban Fringe Zone (**RUFZ**) to Industrial General Zone (**IGZ**) be rejected, with all associated provisions, rules, and the Outline Development Plan (**ODP**) amended accordingly; or

9.3 Any alternative, consequential, or necessary additional amendments to give effect to the matters raised generally by the Submitter in this submission.

10 The Submitter wishes to be heard in support of her submission.

11 If others make a similar submission, the Submitter will consider presenting a joint case with them at any hearing.



_____

Maree Barbara Hedges

By her solicitors and authorised agents Tavendale and Partners Ltd

Sam Chidgey

Email I sam.chidgey@tp.co.nz and alexandra.lile@tp.co.nz

Phone I +64 21 221 1388

[1] Refer to the description of the Submitter's land at [12.1] below.

APPENDIX 1

Background

12 The Submitter is the registered owner of the following land which is directly affected by the Applicant's PC24 request:

12.1 Record of Title 646274 (7.1899 hectares more or less) located at 448 Johns Road and forming part of the land subject to the Applicant's rezoning request (the **Submitter's Land**); and

12.2 Record of Title 355681 (18.6751 hectares more or less) located at 444 Johns Road immediately adjacent to the land subject to the Applicant's rezoning request (the **Submitter's Neighbouring Land**).

*Together, referred to as the "**Two Parcels**".*

13 The Two Parcels have been owned by the Submitter's family since 1905, and have historically been used together as a single, interdependent farming and lifestyle property. Due to the Submitter's long-standing and rich connection to the Two Parcels, she has no intention of selling, subdividing, or allowing the land to be developed for industrial purposes by either the Applicant, or a third party.

14 The Submitter's Land is presently used by the Submitter for a mixture of rural lifestyle and rural activities, including her main home and farmland where she grazes beef cattle. The Submitter understands that under PC24, the Applicant seeks to re-zone approximately 19 hectares of land, from RUFZ to IGZ, introduce an ODP and new IGZ provisions for the area. The total plan change area includes the Submitter's Land, which is around 38.0% or more than one third of the total area for re-zoning under PC24.

15 The Submitter's Neighbouring Land also adjoins the area subject to PC24 and includes Hedges Waterway, an area well known for its significant ecological and natural values. In July 2002, a conservation covenant was registered in favour of the CCC over the area under s 77 of the Reserves Act 1997. The covenant was informed by an ecological assessment which recorded that the Submitter's Neighbouring Land contained 27 indigenous vascular plant species, supports a range of native bird species, has considerable potential to develop into an indigenous swamp forest, and forms an important link in establishing an almost continuous corridor of native habitat along the South Branch of the Waimakariri River and its tributaries. Both the CCC and the Submitter have, as part of, and since the registration of the covenant, incurred significant expenditure and time in maintaining and enhancing the values on the Submitter's Neighbouring Land.

16 While the Applicant is not seeking to re-zone the Submitter's Neighbouring Land under PC24, the Submitter considers that PC24, if granted, could result in significant adverse effects on it, given its ecological and conservation significance. The application bundle does not adequately

recognise or address these values, nor the sensitivity of the receiving environment including its vulnerability to being affected by development enabled under PC24. This is a significant deficiency of PC24 as notified.

17 The Submitter's opposition to PC24 in its entirety is summarised as two-fold:

17.1 First, to avoid any adverse effects that industrial development as enabled by PC24 would have on the Submitter's Land and other neighbouring land where similar rural or residential activities are taking place, and which would be adversely affected by such development; and

17.2 Second, to protect the significant ecological and conservation values of the Submitter's Neighbouring Land and any other similar land in proximity to PC24 from being degraded and/or irreversibly damaged by the industrial development that it will enable.

18 The Submitter's opposition is, unequivocal, for the following reasons set out below.

Insufficient Consultation

19 The Submitter expresses her disappointment that she was not consulted by the Applicant during the development of PC24, particularly given the significant impact the rezoning will have on the Two Parcels.

20 Despite having every opportunity to do so before lodging its plan change request, the Applicant did not provide the Submitter with either a draft or a final copy of its PC24 (in part or in full), nor did it seek to engage with her in any other real or meaningful way.

21 The Applicant's response dated 17 December 2025 to the CCC's Request for Information (**RFI**) confirms this by recording that "*consultation*" with the Submitter was "*limited to the fact that this owner is not interested in rezoning their land*."[2] The Submitter records its position that this, in isolation, is neither a genuine or appropriate attempt to consult with an affected landowner particularly in circumstances where the Applicant is seeking to include the affected landowner's land within its own plan change request.

22 The absence of genuine consultation is a material failure by the Applicant. Had the Submitter been given an opportunity to grapple with, and respond to, the Applicant's proposal prior to lodgement, she could have engaged with the proposal in a more meaningful and constructive way.

23 Instead, the Applicant chose to include the Submitter's Land within PC24, and pressed on to notification, without any genuine consultation first taking place. Having done so, the Submitter

[2] RFI response dated 17 December 2025, response to Question 2.

considers the time for consultation and/or further investigations by the Applicant on the Two Parcels has passed.

24 Essentially, the Submitter considers that the "horse has already bolted," and records her position that she does not consent to any further investigations taking place on the Two Parcels by the Applicant as part of the remainder of the PC24 process.

The Submitter's Land

25 The Applicant's case for its PC24 request to procced appears to rest on a misplaced assertion that re-zoning the Submitter's Land will achieve a logical, contiguous extension of the urban area, resulting in consolidated and connected urban form and a well-functioning urban environment, consistent with the relevant planning objectives and policies, including those identified as being relevant in the application bundle.[3]

26 The Applicant has consistently asserted this throughout its Updated Plan Change Request & Section 32 Report, dated July 2026 (**Updated Assessment**) (emphasis added in **bold**):

> *…The assessment sets out that the **key driver that underpins the proposal** is the **logical extension of existing urban area** in the **immediate vicinity of the site**, and its ability to manage effects on the surrounding environment.*[4]
>
> *In an overall sense, the proposal is considered **well-functioning in terms of providing for a logical extension of the urban area**, which is capable of efficient servicing of infrastructure whilst ensuring that environmental effects are well managed. **The proposed IG zoning also assists in providing a buffer between the existing IH zone to the west and the residential to the south/south-east.***[5]
>
> *…In terms of the location of the site, subclause (c) assessment supports the proposal in terms of its location, given the benefits provided by the proximity of the site to key strategic infrastructure and **as a logical and contiguous extension to the existing urban area.***[6]
>
> *Effects on urban form are considered acceptable, with the rezoning providing significant development capacity as a **logical contiguous extension to the existing urban area**, **contributing to well-functioning urban environments and providing for the consolidation of industrial zoning**.*[7]

27 The Applicant's framing in its Updated Assessment of the outcomes envisioned by the PC24 request including the Submitter's Land is maintained later in the Applicant's December 2025 RFI response, as follows (emphasis added in **bold**): [8]

> *The landowner of **448 Johns Road** is not a part of the request. Consultation undertaken with this landowner has been limited to the fact that this owner is not interested in*

[3] Such as in Appendix J, Provisional Assessment, 370-470 Johns Road.
[4] Updated Assessment, at [31].
[5] At [62].
[6] At [76].
[7] At [139](c).
[8] The Applicant's RFI response, dated 17 December 2025, at page 1.

> *rezoning their land. However, this land has been included within the request* ***to enable a consolidated and connected urban form****, noting that if the request is successful this does not mean the owner of 470 Johns Road needs to vacate their land,* ***and the existing rural activity will continue to be provided for…***

28 In advancing its position, the Applicant has glossed over one key feature, being the Submitter not only opposes the rezoning of the Submitter's Land, but has no intention of selling her land, now or into the future, so it can be developed for industrial use.

29 The Applicant's assertion that the rezoning will, in itself, achieve a "*consolidated and connected urban form*," and result in a "*logical, contiguous expansion*" of the existing industrial area, is therefore at odds with the reality of the situation, that more than a third of the land under PC24 will not be available to achieve the asserted outcomes.

30 Applying a real-world approach, a rezoning where over one third of the rezoned land remains permanently undeveloped can never, in truth, achieve the "*consolidated and connected urban form*" that the Applicant claims. Instead, it will result in the very fragmentation the Applicant's own stated objectives for PC24, as well as the relevant planning provisions seek to avoid. That is, in reality, it will result in two pockets of industrial land being established to the west and east, with the Submitter's Land wedged permanently in between.

31 Put differently, the Submitter considers that the Applicant's position is difficult to reconcile:

31.1 If the Applicant is asserting the Submitter's Land does not need to be developed for PC24 to achieve a "consolidated and connected urban form", it follows that the Submitter's Land was never necessary to include within PC24 to achieve that outcome in the first place and should be excluded from PC24 altogether; or

31.2 If the re-zoning and development of the Submitter's Land is in fact necessary to achieve the stated outcome, then the Applicant cannot reasonably conclude that PC24's purported objectives will ever be achieved, given the Submitter's Land will be tied up indefinitely for rural/rural lifestyle use.

32 On either view, PC24, insofar as it includes the Submitter's Land, does not achieve the outcomes the Applicant itself relies on to demonstrate consistency with the relevant planning objectives and policies. On that basis, the Submitter requests that PC24 be declined.

Adverse Effects

33 For the reasons set out below, the Submitter considers the Applicant has failed to properly assess several adverse effects arising from PC24, while overstating others. The matters as to adverse effects are outlined below:

Submitter's Land is Not Developed

34 The Submitter considers there is a lack of adequate assessment by the Applicant of the adverse effects on the Submitter arising from the scenario in which the Submitter's Land is not developed, including, but not limited to:

34.1 The reverse sensitivity effects arising from the Submitter's continued rural and residential use being situated within, and surrounded by, land zoned and developed for industrial purposes;

34.2 Significant cumulative adverse effects arising from construction, resulting infrastructure, noise, dust, vibration, and lighting, including visual, amenity, and privacy effects, on the Submitter's continued occupation and use of the Submitter's Land, including her ability to continue grazing stock at the property. The Submitter notes that, in the past, she has experienced significant and noxious adverse effects arising from activities authorised to the west of the site, including dust particles travelling from those industrial activities and settling on the Submitter's Land;

34.3 Effects on the Submitter's existing access to her land, both along the paper road, and when leaving and/or accessing Johns Road, given that access will now be shared with other vehicles and trucks, giving rise to significant adverse safety and traffic effects; and

34.4 Potential effects on groundwater and any water supply relied upon by the Submitter, arising from stormwater management, construction and/or any industrial activity on the adjoining land.

35 Because this scenario has not been modelled and evaluated, it is unclear whether, or how, any of the mitigation measures proposed by the Applicant, including the retention of bunding and buffer planting along parts of the site boundary, would address the adverse effects.

36 On the information available, the proposed measures appear to have been designed to mitigate effects on other parts of the site and properties, rather than the effects that would in fact be experienced by the Submitter on the Submitter's Land. In the absence of any assessment of this scenario, the Submitter cannot be satisfied that these, or any other, mitigation measures would adequately address the effects the Submitter's Land.

Effects Overstated and/or Not Realised

37 The Submitter also notes specifically in relation to the Submitter's Land:

37.1 No geotechnical assessment of land stability, and no environmental site investigation or contamination assessment, has been undertaken on the Submitter's Land at any point, as confirmed in the Applicant's 17 December RFI

response.[9] The Applicant's only stated basis for the suitability of this land is an inference drawn from an adjoining, already-developed parcel, rather than any site-specific investigation. The Applicant has asserted that geotechnical investigation of this land "will be required" at a future subdivision stage. The Submitter considers that kicking such matters down the road, so they are determined at the consenting stage is inappropriate, and are matters necessary for determination as a prerequisite to PC24 proceeding as notified; and

37.2 The assumed economic and development capacity benefits in Appendix H – Economic Assessment Report dated 27 February 2026 (**Updated Economics Assessment**), appears to include the Submitter's Land.[10] The assessment of the likely economic effects, including the costs and benefits analysis under s 32(2)(a) RMA is accordingly overstated, as the actual capacity delivered will be smaller than claimed given the Submitter's Land will remain undeveloped. This further undermines the justification for departing from existing urban area and greenfield priority area, and the assertion in the Updated Economic Report that the proposal will give effect to the higher order NPS-UD policies, requiring such development to achieve a well-functioning and urban environment.[11]

Submitter's Neighbouring Land

38 The Submitter's Neighbouring Land adjoins the PC24 site. Its key features are summarised at [15] above. The Submitter considers that PC24 includes an inadequate assessment of the potential for adverse effects of enabling industrial activities to take place adjacent to the Submitter's Neighbouring Land. This includes a failure to adequately assess:

38.1 The realistic scenario, where only part of the site is developed, including evaluating the effects of partial or staged industrial activity in proximity to the Submitter's Neighbouring Land; or

38.2 The potential effects on the ecological and conservation values of the Submitter's Neighbouring Land, arising from construction and post-construction activities, including stormwater discharge, earthworks, noise, dust, lighting, and the general industrial activities that will take place on the site. In particular, the Submitter notes;

(a) The Applicant in its Updated Assessment has reached the following conclusion in relation to the potential effects of development enabled by PC24:[12]

[9] The Applicant's RFI response, dated 17 December, at page 3. Also refer to the Applicant's Preliminary Geotechnical Report dated 11 March 2024, and Environmental Site Investigation dated 21 March 2024.
[10] Updated Economics Assessment dated 27 February 2026, at page 7.
[11] At page 2, where the report concludes that PC24 will give effect to policies 1 and 8 of the NPS-UD.
[12] Updated Assessment, at [139](b).

The proposed plan change can manage potential effects on the Hedges Waterway and is anticipated to result in positive aquatic ecological benefits for the Hedges Waterway corridor through increased riparian planting, while other ecological values on the site are limited due to its highly modified state.

(b) The Submitter's Neighbouring Land consists not only of Hedges Waterway, but overall, is considered by the Submitter to be a highly sensitive environment, containing indigenous fauna and vegetation, springs, and wetland habitat, and is accordingly acutely vulnerable to disturbance and degradation by industrial development proximate to the area;

(c) Despite the above, the Applicant's Freshwater Ecology Assessment dated 6 August 2025 confirmed that a full survey of the Submitter's Neighbouring Land, including for the presence of natural wetlands, indigenous vegetation and fauna of Hedges Waterway is yet to be undertaken to confirm what adverse effects development enabled by PC24 will have on those values;

(d) The Submitter notes, as demonstrated in *Figure 1* below, that Hedges Waterway in and of itself, is a highly natural environment, covered by dense vegetation. This density of vegetation means that ground conditions, including the presence and precise location of springs, wetland habitat, and other sensitive features, cannot reliably be determined from a desktop review alone. In isolation, a desktop analysis is accordingly insufficient to determine what requires protection within that area, or to reach a sound conclusion as to the potential adverse effects that development may have on the receiving environment:

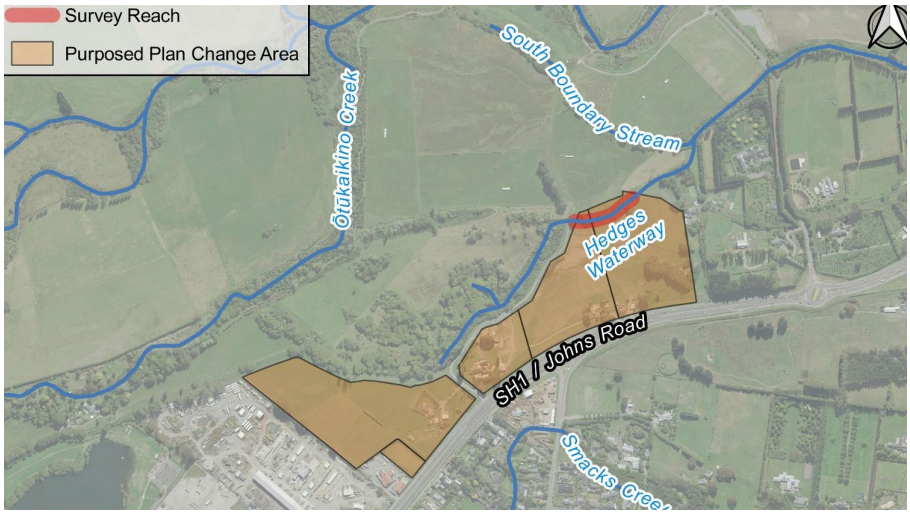


Figure 1: Total Survey Reach highlighted in red

(e) The Applicant's response to the gaps identified above has been to progressively reduce, rather than strengthen, the protective measures

proposed for this area. For example, a bespoke "spring buffer" rule was initially proposed to manage potential effects in the vicinity of the Submitter's Neighbouring Land. This has since been removed, as recorded in the Applicant's July 2026 RFI response,[13] on the basis it was considered administratively difficult to apply.

(f) The Applicant now proposes to rely solely on general subdivision-stage rules of the District Plan to address any effects of PC24 on unidentified springs.[14] The Submitter disagrees with this approach. Subdivision within the PC24 site could procced as a controlled activity under Rule 8.5.1.2 C5, provided the relevant standards are met, meaning consent cannot be declined.

(g) Any effects on any unidentified springs may therefore, at most, inform conditions imposed on a consent that must otherwise be granted. Those rules are also not designed to address the broader ecological values present on the Submitter's Neighbouring Land. For the reasons set out above, the existing mechanisms applying to subdivision cannot in any event, be assumed to adequately protect any unidentified springs and/or the broader ecological values which are present on the Submitter's Neighbouring Land.

(h) Contrary to the Applicant's conclusions, the Submitter considers there is a real risk that construction and post-construction activities associated with PC24 will significantly threaten the ecological and natural values of the Submitter's Neighbouring Land. In the absence of sufficient evidence, it is unclear how the Applicant reached its conclusion, at paragraph 139(b) of its Updated Assessment, that the effects of PC24 on Hedges Waterway will be minor or negligible, or can be adequately avoided or mitigated.

Other Economic Effects

39 The Submitter also raises, as a further effect of PC24, the inevitable impact of the rezoning on the rating valuation of the Submitter's Land. If rezoned to IGZ, the Submitter's Land will attract a significantly higher rating valuation, notwithstanding that she has no intention of selling or developing the land.

40 The Submitter is now confronted with the prospect of a substantially higher rates burden for continuing an existing use of her own land. This is particularly significant given the Submitter's Land alone comprises more than one third of the total area subject to PC24, meaning the increased rates burden she would bear is disproportionately large relative to the benefit, if any, of the rezoning if granted.

[13] Refer to the response at Question 4.
[14] Same as above.

41 The Submitter is particularly concerned this potential burden, imposed on her without her consent and without any corresponding benefit, may prove more than she can reasonably be expected to bear, resulting in a significantly inequitable outcome and prejudice to her as a direct consequence of PC24.

42 Economic effects, including rates increases, fall within the scope of matters properly capable of consideration under the RMA, having regard to the definition of "environment" in s 2 RMA, and the requirements in cl 7, sch 4 RMA to address social, economic, and cultural effects. In summary, this is an adverse effect of PC24, which will result in significant consequences for the Submitter.

Effects on Neighbouring Land

43 For completeness, and without derogating from the specific matters raised above, the Submitter notes the adverse effects of PC24 will not be confined to the Two Parcels in isolation. The Applicant's assessment concludes that the adverse effects of PC24 on other neighbouring landowners will be minor or negligible or can be adequately avoided or mitigated.[15] The Submitter disagrees with this assertion and considers that the adverse effects of PC24 on other land bordering the site, including those along Johns Road, are likely to be significant.

44 Given the scale of the rezoning sought, and the matters raised in this submission regarding the adequacy of the Applicant's effects assessment more generally, the Submitter considers it likely that other neighbouring landowners will experience similar effects to those addressed above, including but not limited to traffic, safety and access effects, noise and dust, and visual, privacy and amenity effects.

Effects Conclusion

45 Clause 22(2), sch 1 RMA requires the Applicant, in the context of a plan change request, to:

45.1 Describe the actual or potential environmental effects of PC24;

45.2 Having regard to cl 6 and 7 of sch 4; and

45.3 In a level of detail proportionate to the scale and significance of those effects.

46 The requirements are distinct from the requirement to prepare a s 32 RMA evaluation addressed below. However, the reliability of that s 32 RMA evaluation depends ultimately on the adequacy of the underlying assessment of material effects upon which it is based.

47 For the reasons set out above, the Applicant's assessment does not adequately describe and evaluate the actual or potential effects of PC24 on the Submitter's Land or the Submitter's Neighbouring Land, nor does it identify the Submitter as a person directly and adversely

[15] Updated Assessment, at [138].

affected by PC24 whose position ought to have informed that assessment. The Submitter accordingly considers the Applicant's assessment of environmental effects to be deficient. This is a distinct flaw in PC24 as notified, separate from, and additional to, the deficiencies in the s 32 RMA evaluation addressed below.

48 Considering these gaps, the Submitter considers there is not currently a sufficiently robust, evidence-based justification supporting the Applicant's request for PC24 to proceed, whether in relation to the effects that industrial development enabled by PC24 will have on the Submitter's Land, or on the Submitter's Neighbouring Land.

49 Sections 3(f) and 32(2)(c) RMA require these uncertainties to be properly confronted and not assumed away. Given the gaps in the evidence as to effects, and whether they can be appropriately managed by the provisions of PC24, the Submitter requests the CCC decline PC24, or, in the alternative, exclude the Submitter's Land from it.

S 32 Evaluation is Deficient

50 Clause 22(1), sch 1 RMA requires a private plan change request to be accompanied by an evaluation report prepared by the Applicant in accordance with s 32 RMA.

51 A s 32 RMA evaluation prepared by an applicant must examine the extent, to which:

51.1 The objectives of PC24 are the most appropriate way to achieve the purpose of the RMA, under s 32(1)(a) RMA;

51.2 The provisions of PC24 themselves are the most appropriate way to achieve those objectives, having regard to:

(a) Other reasonably practicable options for achieving the objectives under s 32(1)(b)(i) RMA;

(b) The efficiency and effectiveness of the provisions in achieving the objectives under s 32(1)(b)(ii) RMA; and

(c) The benefits and costs of the environmental, economic, social, and cultural effects anticipated from PC24, including any opportunities for economic growth and employment under s 32(2)(a) RMA;

51.3 The evaluation contains a level of detail that corresponds to the scale and significance of the effects anticipated under s 32(1)(c) RMA; and

51.4 The risk of acting, or not acting, has been assessed where there is uncertain or insufficient information about the subject matter of the provisions under s 32(2)(c) RMA.

52 The Submitter considers the s 32 RMA report does not meet these requirements, including for the following reasons:

52.1 The s 32 RMA report considers only the status quo, the requested rezoning, and rezoning to another industrial zone, each applied uniformly across the site, and therefore has not complied with s 32(1)(b)(i) RMA. The option to rezone the land while excluding the Submitter's Land was never considered, despite the Applicant knowing early on that the Submitter would not participate;

52.2 As explained above, the Applicant's objective of a "consolidated and connected urban form" cannot be achieved in respect of the Submitter's Land, and the s 32 RMA evaluation of this objective therefore does not satisfy s 32(1)(a) RMA;

52.3 The claimed economic and development capacity benefits appear to include the Submitter's Land, which the Applicant in its later RFI Response concedes that development cannot occur unless and until the Submitter "chooses to give effect to the zoning."[16] The Applicant's assessment of costs and benefits under s 32(2)(a) RMA is accordingly overstated, as the actual capacity delivered will be smaller than claimed given the land will not be sold and developed, undermining the justification for departing from the key, existing urban area and greenfield priority area objectives and policies;

52.4 Section 32(1)(b)(ii) RMA requires an assessment of the efficiency and effectiveness of the provisions in achieving the objectives. A provision cannot be effective in achieving consolidated industrial development, if over a third of the re-zoning is unlikely to ever be given effect to. As confirmed throughout, the Submitter will not develop or sell her land, yet the Applicant has not assessed the effectiveness of applying the proposed zoning to the Submitter's Land in light of that fact;

52.5 A provision is only effective if it is likely to be given effect to, and the Applicant has therefore not satisfied s 32(1)(b)(ii) RMA. The Submitter has confirmed she will not develop or sell her land, yet the effectiveness of applying the proposed zoning to it has not been assessed and/or realised; and

52.6 The s 32 RMA evaluation fails to consider the identified and reasonably foreseeable scenario in which PC24 is granted, but the Submitter's Land remains undeveloped. The effects of that scenario, including reverse sensitivity, traffic and access safety, and amenity effects on the Submitter, differ materially from those assessed on the assumption of full site-wide development, and have not been evaluated, contrary to s 32(1)(c) RMA.

[16] RFI response dated 17 December 2025, paragraph 4.

53 For these reasons, the s 32 RMA evaluation does not demonstrate that PC24 is the most appropriate way to achieve the RMA's purpose, and the Submitter requests that PC24 be rejected as a result.

Overall Reasons

54 Without derogating from the specific reasons set out above, the Submitter generally opposes PC24, insofar as the rezoning and associated provisions fail to appropriately give effect to Part 2 of the Act. PC24 specifically does not:

54.1 Promote the sustainable management of natural and physical resources;

54.2 Enable the Submitter to provide for her social, economic wellbeing, because the rezoning will unnecessarily restrict her continued and ordinary use and enjoyment of the Submitter's Land and the Submitter's Neighbouring Land;

54.3 Appropriately recognise and provide for the protection of significant indigenous vegetation and habitat on the Submitter's Neighbouring Land as a matter of national importance under s 6 RMA;

54.4 Have particular regard to the efficient use of the Submitter's Land bearing in mind its current, lawful, and ongoing use, as required by s 7(b) RMA;

54.5 Appropriately recognise and provide for the actual and potential adverse effects of PC24 as an important consideration, instead proceeding based on unsupported assumptions as to the future use and development of the Submitter's Land, as set out above; or

54.6 Represent the most appropriate means of exercising the Council's functions under the Act.

Decisions Requested

55 The Submitter in the first instance seeks the CCC decline PC24 in its entirety. In the alternative, it seeks that:

55.1 The Applicant's request to re-zone the Submitter's Land from RUFZ to IGZ be rejected, with all associated objectives, policies rules, and the ODP be amended to reflect the removal of the Submitter's Land from the plan change; and/or

55.2 Any alternative, consequential, or necessary additional amendments to give effect to the matters raised generally by the Submitter in this submission.

Wish to be Heard

56 The Submitter wishes to be heard in support of this submission.

57 If others are making a similar submission the Submitter would consider presenting a joint case with them at the hearing.

58 The Submitter invites the Commissioner to undertake a site visit at the Submitter's Land and Submitter's Neighbouring Land, should the Commissioner consider this to be necessary or of assistance in determining PC24.

PC24 - Johns Road Industrial

Christchurch City Council

Submitter Details

Submission Date: 09/09/2026

First name: Karina **Last name:** Langley

Prefered method of contact Email

Would you like to present your submission in person at a hearing? *

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Feedback

For more information on the Plan Change click here:

I/We:

Oppose all or part of the plan change

The specific provisions of the plan change that my / our submission relates to are: (give details, using additional pages if required)

Traffic safety & congestion

Noise and vibration

Air Quality

Stormwater/Waterways

Industrial Expansion

The reasons for my / our submission are: (use additional pages if required)

Traffic safety & congestion - higher traffic volumes & increased heavy vehicle traffic has safety implications for my children who cycle down Gardiners Rd to school. Increased traffic will also impact on my travel due to increased queuing & turning delays. Gardiners Rd already becomes congested during peak times & this will escalate as new subdivisions off Highsted & Styx Mill Roads become populated.

- see additional pages

The decision / we would like the Council to make is: (give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of the amendments you seek. Use additional pages if required)

I request the council decline plan change #24 to preserve the wellbeing of my community & maintain our current quality of life.

- see additional pages

Attached Documents

Name
change plan #24 K. Langley

Christchurch City Council

Submission on a Publicly Notified Plan Change to the Christchurch District Plan

Resource Management Act 1991 – Form 5

Email to: PlanChange@ccc.govt.nz ; or
Deliver to: Ground floor reception, Christchurch City Council, 53 Hereford Street, Christchurch Attn: City Planning Team; or
Send to: City Planning Team, Christchurch City Council, PO Box 73012, Christchurch, 8154

For enquiries phone: (03) 941 8999

1. I wish to make a submission on:

Plan change name & number: # 24 Johns Road Industrial

2. Submitter details

Full name of submitter: Karina Langley
Street address: 9 Eleanor Lane
Postal Address (if different):
Contact phone number (daytime): 021 256 8931 Postcode: 8051
Email: karina-langley@hotmail.com

My address for service for receiving documents and communication about this plan change is: ☑ By email ☐ By post

3. Submission details

I / We:
☐ Support all or part of the plan change
☑ Oppose all or part of the plan change
☐ Am neutral towards the plan change

The specific provisions of the plan change that my / our submission relates to are: *(give details, using additional pages if required)*

- Traffic Safety & Congestion
- Noise and Vibration
- Air Quality
- Stormwater / Waterways
- Industrial Expansion.

The reasons for my / our submission are: *(use additional pages if required)*

- Traffic Safety & Congestion - higher traffic volumes & increased heavy vechile traffic has safety implications for my children who cycle down Gardiners Rd to school. Increased traffic will also impact on my travel due to increased queuing & turning delays. Gardiners Rd already becomes congested during peak times & this will escalate as new subdivisions off Highstead & Styx Mill Roads become populated.

- see additional pages

The decision I / we would like the Council to make is: *(give details including, if relevant, the parts of the plan change you wish to have amended and the general nature of any conditions sought. Use additional pages if required)*

I request the council decline plan change # 24 to preserve the wellbeing of my community & maintain our current quality of life.

- see additional pages.

4. Trade competition

I / We: ☐ **could** / ☑ **could not** gain an advantage in trade competition through this submission.

If you are a person who could gain advantage in trade competition through this submission, are you directly affected by and effect of the proposed plan charge/part of the plan change that –

a) adversely affects the environment, and

b) does not relate to the trade competition or the effects of trade competition?

☐ Yes ☐ No

5. Hearing of this plan change

If a hearing is held, I / we:

☐ **Wish to** speak in support of my / our submission

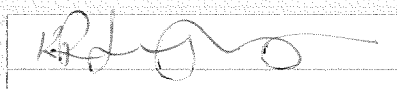
☐ **Do not wish to** speak in support of my / our submission

☑ If others make a similar submission I / we will consider presenting a joint case with them at the hearing

Please note that a hearing will only be held if any of the submitters wish to be heard, but all submissions will be taken into consideration regardless.

If you change your mind about whether you wish to speak at the hearing, please contact the Council by telephone on 941 8999 or by email at PlanChange@ccc.govt.nz.

6. Signature (of submitter(s) or person authorised to sign on behalf of submitter(s)

Signature:		Date:	08/09/2026
Signature:		Date:	

Note: A signature is not required if you make your submission electronically

Important information

1. The Council must receive your submission before the closing date and time for submissions on this plan change.
2. If you are a trade competitor, your right to make a submission may be limited by the provisions in Part 11A of the RMA.
3. The Council may strike out a submission (or part of it) in the following situations:
   - It is frivolous or vexatious
   - It discloses no reasonable or relevant case
   - It would be an abuse of the hearing process to allow it to be taken further
   - It contains offensive language
   - It is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matters.

Privacy information

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker).

Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this plan change prior to making your submission.

Office use only

Received at the ..... Office on ..... at ..... am / pm

- Noise & Vibration - increased heavy vechiles using Gardiners Rd & increased traffic volumes will increase road noise heard from my address. Industrial General zoning permits 24/7 operations, causing increased traffic noise & vibration in evenings.

- Air Quality - diesel emissions from increased truck movements could effect air quality in my backyard & local park. I am also concerned about emissions from industrial operations in my neighborhood.

- Stormwate / Waterways - I am concerned about contaminants entering our waterways, like Hedges Waterway. I am also concerned about soil contamination from runoff.

- Industrial Expansion - the plan proposes an industrial block in a rural / urban fringe zone. This contributes to industrial creep toward residential neighbourhoods. This impacts on community & family life & wellbeing. It also sets a precedent for further industrial expansion.

If not declined + request:

- strict control on hours of operation - business hours.
- acoustic mitigation for increased traffic noise
- a more robust stormwater management plan & consideration of soil impacts from runoff.
- a comprehensive traffic safety assessment specifically addressing Gardiners Rd & school-aged children.
- restrictions on high-impact industrial activities near residential areas.