

District Plan Change 20 – Industrial Plan Change | Analysis of pre-notification feedback

Pre-notification engagement on District Plan Change 20 - Industrial Plan Change ran from 24 February to 31 March 2025. This feedback is intended to inform the further development of the proposed plan change.

Pre-notification engagement started on 24 February and ran until 31 March 2025. Consultation details including links to the project information shared on the [Kōrero mai | Let’s talk webpage](#) were advertised via letters delivered to all owners of industrial land at the residential interface, emails to 135 identified stakeholders including business and residents’ associations, and a [Newsline story](#) which was shared on Council’s social media.

The Kōrero mai webpage received 2,404 views over the engagement period.

Who we heard from

Feedback was received from 54 businesses and organisations and 37 individuals.

A PDF of all feedback received during this period is available on the [Kōrero mai | Let talk webpage](#).

Thematic analysis

Note: this table does not include rezoning requests (these will be delt with separately), or detailed information provided by industrial operators on the nature of their industrial activities.

Issue	Feedback received
Industrial stakeholders’ experiences at the interface with residential zones	
Industrial businesses providing input on the draft	Twenty five businesses confirmed the nature of their business in the survey and an additional 15 provided details in an attachment. The responses are as follows: Warehousing (2); Warehousing and manufacturing (1); Warehousing, online sales and ancillary retail (1); Warehousing, b2b distribution (1); Leasing warehousing and ancillary retail (1); Vehicle sales warehouse (2); Customs Brokerage and warehousing (1); Container storage and repair (1); Metal recycling yard (4); Metal recycling association (1); National road freight association (1); Fertiliser manufacturer (1); Manufacturer of gypsum plasterboard (1); Construction company (1); Demolition company (1); Builders yard and storage (1); Construction and industrial property ownership firm (1); Commercial building owners, maintenance and fabrication (1); Vehicle dismantling (1); Trade supplier and yard (1); Truck dealership (2); Transport and logistics company (1); Railway infrastructure provider (KiwiRail) (1); Service stations (including truck stops) and bulk fuel terminals (1); Solid and liquid waste management company (1); Self storage/proposed hotel business (1); Distillery (1); A ballroom teaching studio (1); Developer of several industrial properties (1); Commercial property owner (3); Various (1); Empty land and intend to put industrial / commercial building on the site (1). Twenty four businesses confirmed whether they own or lease their site. The responses are as follows: Operate only (5); Own and occupy (11); Own the land and lease/rent it out (8). Twenty three businesses confirmed how long the business has been operating from the site. The responses are as follows: 0-3 years (3); 4-6 years (2); 7-9 years (6); 10 years + (13). Twenty five businesses confirmed their proximity to residential properties. The responses are as follows: Shared boundary (7); Across the road (or equivalent) (10); Further away (1); Not near residential property (4); The border at the back of the property there is a swale and about 10m of grass/planting before a residential housing area (1); Various (1); The Fuel Companies have multiple sites so all of the above apply from a 'shared boundary' to 'not near residential property' (1).
Whether neighbouring residential property impact business operations	Twenty four businesses confirmed if neighbouring residential property impact business operations. The responses are as follows: Neighbouring residential property don’t impact business operations (17); We want to do more on our site but feel that we can’t because of impacts on residential property (it’s limiting business growth) (4); We do our best to manage impacts on neighbouring residential property (10); We would like to know more about reducing impacts on residential property (4); We’re aware of complaints and that we may impact some residential neighbours (3).

Majority of industrial activities not impacting neighbours	The <u>Waterloo Business Park</u> consider the majority of industrial zoned sites create no problems at all to adjoining non-industrial zoned sites and should be permitted to continue to operate under the existing industrial-zoned rules. The majority of the sites within the Waterloo Business Park are undeveloped and not presently being used for Industrial Purposes. A <u>warehousing business</u> comments that as far as they know all businesses on Sturrocks road are considerate of their neighbours, with no heavy industry in this particular area. They live in harmony with their neighbours, hate that change to be forced on their business. A <u>customs brokerage and warehousing business</u> comments that they have minimal impact.
Businesses as part of the community / workers live nearby	A <u>construction company</u> comments that they are part of the community. They do a lot of construction work for the city council, for example they just finished the Drummonds Jetty and previously Built the Marshlands/Lower Styx Bridge. A lot of their staff live near their yard in Belfast and this premises is their largest asset.
Current efforts by businesses to reduce impacts on neighbouring property	A <u>self storage/proposed hotel business</u> comments that Motel X is currently in the planning and approval stage, and the site is still operating as a self-storage facility. However, they are proactively incorporating measures into the design to ensure minimal impact on neighbouring residential properties once operations begin. These include noise mitigation, privacy and discretion, traffic and parking considerations and proactive engagement. A <u>customs brokerage and warehousing business</u> comments that they try to keep things clean on the street and also help to do neighbours lawns. A <u>truck dealership</u> tries to limit excessive noise in their yard outside of normal business hours. Another <u>truck dealership</u> comments that their business generally only operates during business hours. Any operation carried out during non business hours they try to minimize noise. A <u>building company</u> seldom operates outside 8am to 7pm and the site is mostly used as storage so very little noise. An <u>owner of vacant land to be developed</u> comments that the site is empty and has a driveway that does not impact any of the residential houses across an overpass bridge. Understandably any activity would have some form of impact, but the distance and the type of activity mitigates it. A <u>metal recycling business</u> operates workable hours of daylight Monday to Saturday. Since early complaints by neighbours in 2018 they reduced operating hours from 7am start to 8am start and never work later than 6pm in summer, winter even less. They very rarely do work after midday Saturday and have never worked Sunday. Now that they have ECan consent the next steps are to develop the eastern area of the site which is where the future metal recycling yard will be situated. A <u>warehousing and manufacturing business</u> respond to issues about traffic volume, turning circles, or noise and debris.
Growth of industrial activities impacted by residential neighbours	A <u>vehicle sales warehouse business</u> cannot build another warehouse because of residential boundary restrictions. They would like to build residential housing on the two properties they own in Barbour Street. Their sites are restricted because of residential boundary restrictions. A concept plan for another warehouse has been submitted before and they hope the Council will understand that because of these restrictions a proper working warehouse cannot be built.
Growth of non-industrial commercial activities impacted by residential neighbours	A <u>ballroom teaching studio</u> and a <u>self storage/proposed hotel business</u> at present have limited hours because of noise limits, these relate to being near residential property, they would be open extra hours if they could. The <u>ballroom teaching studio</u> would like to do more on their site but feel that they can't because of impacts on residential property (it's limiting business growth). The <u>self storage/proposed hotel business</u> which is still in the planning and approval stage, have not yet experienced direct limitations due to neighbouring residential properties and are designing Motel X to ensure minimal disruption.
Residents' experiences at the interface with industrial zones	
Challenges faced by residents from effects of industrial activities	Thirty-six <u>residents</u> outlined how close their home is to industrial properties. The responses are as follows: Shared boundary (4); Across the road (or equivalent) (12); Further away (11); Not close to industrial property (3); Home is on an industrial zone (1); One house back from Factory Rd, less than 100m from new industrial area (1); Nothing to do with (1); Live on Rutherford Street, which is a highway with heavy traffic and zoned industrial (1); There is a strip of residential housing on industrial land on Radley St (1).

	Thirty-one <u>residents</u> outlined what type of industrial activity has effects on their residential property. The responses are as follows: Scrap metal yard (1); Vehicle scrap yards (1); Scrap metal yard explosion opposite the Tannery in Garlands Rd (1); Loud noise at night from the loading of scrap metal trucks. Sometimes right through the night. Also loud booms, apparently from when they crush LPG bottles (1); Container/freight yards (6); Container park along the Opawaho-Heathcote River (1); Mechanical noises and sounds from containers being dropped (1); Ongoing, early morning delivery of waste skips and containers (1); Junk yard (1); Mechanic (1); Sheepskin factory (1); Warehousing (1); Manufacture (1); Heavy machinery sales (1); Bitumen plant (1); Cement plant (1); The Lyttelton Port (1); Heavy traffic movements 24/7 (1); Trucks - dangerous driving and visually displeasing (1); Vibration from heavy trucks (1); Industrial General, with multiple uses (1); General light industrial a short walk away (1); Warehousing and factory (2); Warehousing, factory, logistics (1); Other industrial businesses (1); Land preparation for industrial site. Concerned about what it will be like once building starts (1); Businesses operate behind property and near property. There is release of gases BOC and testing of engines that impact property but mainly it's pretty quiet so not bothered by it generally quiet weekends and evenings (1); Loud radio at weekends and night from Gym (1); National Steel Car Yard, Port-Link Industrial Park, Increase in heavy vehicles on highway Rutherford Street and beyond (1); Car park (1); All sorts (1); All (1); Little (1); None (4); Nothing to do with (1). Thirty-one <u>residents</u> outlined what challenges their home faces relating to neighbouring industrial property. The responses are as follows: Noise (23); Visual Impact (13); Dust (9); Odour (9); Vibration (16); Heavy vehicle traffic 24/7 (that shakes the road and houses, and impacts on sleep and working from home) (1); Heavy Vehicle Movements 24/7 (1); Traffic on Factory Rd, entry into intersection Factory Rd and Tyrone St (1); Increased heavy vehicle volume on Rutherford Street Garlands Road (1); Traffic congestion and volume has sky rocketed cause more dangerous roads (1); Gas release from bottles noise and sometimes high-pitched squeal (1); Speeding (1); None/nothing (3). Thirty-one <u>residents</u> outlined how frequently they are impacted. The responses are as follows: Every day/night (18); Once a week (1); Once a month (3); More than once a week, but intermittently (1); Most nights 4-6pw; Vibration, daily - noise, once or twice per week (1); 5 days - Most activity is only daylight hours M-F, and not overtly annoying. With the exception of a nearby steel fabricator, who emits some sudden loud noise during a normal day work, penetrating noises tend to be infrequent and specifically overnight or early morning (1); The heavy traffic on Rutherford Street is noisy, and exacerbates the dangers of getting in and out of our shared driveway. Also impacted visually by the container park, though at a distance. Really feel for the people living closer to it (1); Irregularly for gas and squeal but engine testing once a month they also dangerously drive on Epsom Road at speed (1); Once or twice a year (1); Never (2). Twenty-eight <u>residents</u> outlined what time of day they are impacted. The responses are as follows: Early mornings (3am-7am) (11); During the day (7am-5pm) (17); Evening (5pm-10pm) (11); Night (10pm-3am) (11); Any time (1); Vibration, 6am-10pm ; noise, 10pm-6am for skips or containers, during evenings or during day at weekends for loud radio/music from gym, has recently ceased (1); Closest are storage units. Renters have unrestricted access, activity is irregular, infrequent, but often noisy. Other tenants have irregular movement of containers, skip bins, vehicle noise and sudden loud noise. Emptying of skips, dropping and scraping of skips and containers causes sudden penetrating noise (1); Squeal can be hours and anytime. Engines evenings or weekends (1); Never (2).
Challenges in Community Board areas	The <u>Waihoru Spreydon-Cashmere-Heathcote Community Board</u> outlines that the industry residential interface is a significant issue for parts of the Spreydon-Cashmere-Heathcote areas. The <u>Waipuna Halswell Hornby Riccarton Community Board</u> is aware that Hornby in particular is home to heavy, medium and light industry as well as residential areas and will also soon become the site of the new Ecogas facility. The Board regularly hears of residents' concerns about the adverse effects of nearby industry on their lives.
Some willingness to accept lower amenity near industrial areas	One <u>resident</u> outlines that when they purchased their home on Radley Street they were fully aware that there was a factory over the back fence, and that there would likely be some noises they would have to accept as a natural and fair part of the deal.
Inadequate enforcement	Two Bromley <u>residents</u> have been adversely impacted by noise carried across the Ruru Lawn Cemetery from the industrial area, primarily from a metal recycling yard. The noise is throughout the day and night, resulting in adverse health impacts, discourages them from enjoying their outdoor living and impacts their children as it can be heard at the nearby school as well. They are not satisfied with the outcome of their numerous complaints and seek more power to a body such as noise control with more procedures and ways of measuring noise at the time of the complaint could be a better way forward.

	One Woolston resident comments that they don't believe current plan requirements are followed or enforced. Current noise level requirements are constantly breached with little recourse.
Adverse effects from container yards	One <u>resident</u> describes being more than 200m away from a container yard and experiencing clanging and banging all day long from early hours, it takes away from the tranquillity of their cul de sac, their French doors rattle, their cars are covered in dust and they have health effects such as coughing.
Adverse effects from scrap metal yards	One Woolston <u>resident</u> describes a yard full of rusty metal and other junk opposite their house and seeks that it's required to be hidden by a fence. One Woolston <u>resident</u> considers the metal yards are an eye sore and bring down an area that used to be improving.
Adverse effects from industrial activities near Opawaho-Heathcote River	One <u>resident</u> comments that they walk frequently along the Opawaho-Heathcote Ferryroad loop. Portlink and other industrial activities along the river are intensifying and this is regrettable. They support OHRN in all their campaigning to get better outcomes for the river and residents, given that Portlink breached its consent conditions. There are also light industrial activities that back onto the river from behind Ferry Road that are messy, and noisy at times. Various scrap-metal yards are a lamentable eyesore but suppose can't be got rid of. They hope pollution controls are enforced and made more rigorous over time, and that the businesses are encouraged to improve their visual aspect. It will be interesting to observe how the industrial-residential friction evolves as more infill housing is consented and built in Woolston and similar suburbs elsewhere. It is perhaps a matter of the CCC attempting to play catch up but in the long-run, industry needs to do better to be a good neighbour and the council's Draft Plan PC20 is a start.
Adverse effects from heavy vehicles	One Woolston <u>resident</u> comments that even with Traffic calming these areas become increasingly dangerous to drive through.
Adverse effects from waste facility	One <u>resident</u> raised concerns with the noise levels at the Styx Road eco centre.
General feedback on draft plan change	
Support draft plan change	The Waihoru Spreydon-Cashmere-Heathcote Community Board supports the proposed plan change 20, which takes a stance of making positive changes for the future. Kāinga Ora 'broadly supports many of the proposed amendments in Plan Change 20 that aim to improve outcomes at the residential-industrial interface. Kāinga Ora owns approximately 900 homes across Christchurch that are located within interface areas. These sites are often negatively affected by the adverse effects of industrial activity, including noise, odour, heavy vehicle movements, and visual amenity impacts. The wellbeing of their customers is directly impacted by the quality of the surrounding environment, and they support changes that reduce conflict and enhance the liveability of interface areas.
If the District Plan Change will assist in managing any issues at the industrial / residential interface	Out of 38 <u>residents</u> who answered this question, the responses were as follows: Yes (9), Somewhat (9), No (10), Don't know/not sure (10). Out of 27 <u>industrial respondents</u> who answered this question, the responses were as follows: - Yes (3 – Warehousing and manufacturing, vehicle sales warehouse business, trade supplier and yard), - Somewhat (8 – Warehousing x 3, online sales and ancillary retail, b2b distribution, container storage and repair vehicle sales warehouse, leasing warehousing and ancillary retail, empty land with the intention of putting an industrial commercial building on the site, self storage/proposed hotel business), - No (10 – Various, metal recycling yard x 2, developer of several industrial properties, service stations (including truck stops) and bulk fuel terminals, truck dealership x 2, ballroom teaching studio, vehicle dismantling), - Don't know/not sure (6 – Builders yard, storage, commercial building owners, maintenance and fabrication, warehousing, distillery, customs brokerage, warehousing).
Draft PC does not go far enough to manage the interface	One <u>resident</u> comments that with the move of people from the East post the earthquake the South-West seen massive growth in residential and industrial land use. Some of it has been managed very well while others have been very badly managed. This plan only goes a very small way to mitigate the very badly managed. One <u>resident</u> is concerned it does not go far enough to protect residents from the impacts of industrial activities. Residential areas that are not "adjoining" or across the street from industrial areas can be impacted by industrial activities and should be included in the requirements, including those across open space areas, rivers, or otherwise having limited separation.

Need to protect residential activities near industrial zones	The <u>Waipuna Halswell Hornby Riccarton Community Board</u> seeks to ensure that where possible the District Plan affords the highest level of protection for residents in dwellings at the Industrial/residential interface. While recognising the importance of industry in the area it is anxious to see that residents are provided the greatest possible protection from these effects. One <u>resident</u> seeks consideration of the amenity value of the views of the Port Hills for low income suburbs. One <u>resident</u> comments that the industrial/residential interface of the Woolston area needs urgent attention and positive action to mitigate the continuing social and environmental degradation. They comments that there is significant ongoing significant residential development, making balancing the residential/industrial interface more pertinent and urgent. The wider social and environmental implications of this increase in residential activity need to be considered including roading, parking, landscaping, schooling, social amenities, public transport. Rutherford St is a main highway and is currently unsafe for residents because of the high volume of heavy vehicles and traffic which could be rerouted. Safe parking for residents needs urgent attention.
Industrial operators could pay for mitigation within residential zone	One <u>resident</u> seeks that industrial users could pay for the mitigation to take place in the residential zone if this is a reasonable option. i.e. sound deadening material fitted to houses where this would adequately mitigate an unavoidable output.
Apply new rules to existing industrial activities	The <u>Addington Neighbourhood Association</u> seeks that existing industrial businesses which are being "inconsiderate neighbours" will still have to follow the new regulations, even if it is after a phase-in period. One resident comments that there is a limited ability to manage the interface if existing industrial activities cannot be challenged. The Port Link industrial park, national steel yard are existing major offenders on many levels and are polluting the environment, social and environmentally on a daily basis.
Some industrial activities not keeping to the rules	Three <u>residents</u> are concerned that already established businesses are not following the rules/they are not being upheld for new businesses or ones that are already established.
Effectively managing reverse sensitivity	<u>Environment Canterbury</u> comment that the purpose of the draft plan change gives effect to CRPS policy 6.3.6(8), to ensure that reverse sensitivity effects associated with business activities are identified and avoided or mitigated against and aligns with CRPS direction to provide for quality living environments (objective 6.2.3(1)).
Council enabling new residential areas near existing industrial areas and vice versa	One Belfast <u>resident</u> seeks that impacts on existing residents are considered when Council allows new industrial areas nearby and that Council better manages the road infrastructure to protect residents and do not require development contributions until roading and access is in place. One <u>resident</u> seeks clarity on why Council allows houses to intrude into heavy industrial areas such as Woolston / Ferrymead, an area that is serviced to support heavy industry. A <u>transport and logistics company</u> comments that new residential developments have been approved by the council despite industrial zoning close by. This suggests an implicit understanding that industrial activity was present and would continue in these areas. An <u>individual with interests in the Industrial G zone</u> considers that some issues need to be managed differently but Council created the zones in the first instance and allowed residential and industrial properties to border each other. A <u>ballroom teaching studio</u> considers the changes will result in reverse sensitivity exactly the same as effects hospitality in the CBD, and does not understand why CCC thinks it is good idea to put residential zoning in what has always been an industrial area. Longterm as residential development comes into the area all CCC will get is complaints from both existing industrial users and res occupiers, this is not an area where residential development should be encouraged. A <u>demolition company</u> comments that Council approved an intensive older person housing development to the south of their land (RMA/2020/1832) and within 200m of existing industrial developments at 60 Blakes Road. The decision raises no concerns regarding reverse sensitivity despite allowing for residential development within 200m of Heavy Industrial zoned land.

Industry close to residential as positive	One <u>resident</u> considers there are clear advantages to both businesses and residents by having both in close proximity. People living nearby and moving around make it safer for businesses and less likely they will be broken into and does discourage hoons who speed and do burnouts on emptier roads (usually early in mornings). Having industry scattered among housing gives the opportunity for local employment, thus reducing the need to commute.
If over the next 2-10 years plan on expanding or changing business operations particularly at the residential-industrial interface	Out of 13 <u>industrial respondents</u> who answered this question, the responses were as follows: - Yes (13 – Warehousing x 3, b2b distribution, manufacturing, metal recycler, developer of several industrial properties, vehicle sales warehouse x 2, empty land with the intention of putting an industrial commercial building on the site, truck dealership x 2, builders yard, storage, vehicle dismantling, self storage) - No (0)
If the rules will impact future business decisions (in terms of diversifying or expanding)	Out of 25 <u>industrial respondents</u> who answered this question, the responses were as follows: - Yes (17 – Warehousing x 5, online sales and ancillary retail, b2b distribution, various, metal recycling yard x 2, manufacturing, developer of several industrial properties, vehicle sales warehouse x 2, leasing warehouse and ancillary retail, empty land with intention of putting industrial commercial building on site, ballroom teaching studio, vehicle dismantling, distillery, trade supplier and yard), - Somewhat (5 – Container storage and repair, service stations (including truck stops) and bulk fuel terminals, truck dealership x 2, self storage/proposed hotel business), - No (0) - Don't know/not sure (3 – Customs brokerage, warehousing, commercial building owners, maintenance and fabrication, builders yard, storage)
Suitable industrial land is already difficult and expensive to obtain	An <u>industrial property developer</u> considers it is difficult and expensive enough to get suitable industrial zone land in Christchurch, without introducing rules that will make the use of that land even more challenging and inefficient.
Need to provide for, protect and encourage industrial activities / not institutionalise reverse sensitivity effects	<u>Environment Canterbury</u> comment that District plan provisions must also identify and provide for business land use needs (NPS-UD Policy 2, CRPS Objective 6.2.6) including ensuring sufficient business land capacity (NPS-UD Policy 2), ensuring close proximity of business land to labour supply, major transport hubs and passenger transport networks (CRPS Objective 6.2.6, Policy 6.3.6(9)), encouraging self-sufficiency of employment and business activities within communities in Greater Christchurch (CRPS Policy 6.3.6(10)) and encouraging and providing for regeneration of brownfield areas (CRPS Policy 6.3.8). Encourage CCC to ensure adequate assessment of the potential impacts of the proposal, in terms of the above objectives and policies, for business activities. One <u>resident</u> considers that industry is vital for the economic success of the city and region and should be encouraged, not limited, including for existing activities that want to expand. <u>Lyttelton Port Company</u> considers there is a critical need to protect and preserve strategic industrial zones in areas that are well-served by transportation infrastructure, including access to the Port. While LPC acknowledges the potential benefits of amenity-related enhancements in smaller industrial zones that are primarily surrounded by residential areas, the proposed blanket setbacks and other regulations restricting noise, heavy vehicle access, and, in particular, those affecting container storage are not suitable for meeting the specific needs and characteristics of the Woolston / Hillsborough industrial area. A <u>transport and logistics company</u> considers many businesses have heavily invested in infrastructure to support local and national economies. These businesses and investments are at risk if restrictions are imposed on their operations, particularly when such restrictions would create an imbalance between the interests of residential property owners and those of businesses who also pay rates, etc. A <u>building company</u> considers they do not have concerns for how the draft may impact the future use of their site so long as it allows the continued use of the sites for the activities that they do and have done for many years, and does not restrict the development of further storage facilities that they have planned. Two <u>metal recycling businesses</u> comment that Objectives 3.3.5 and 16.2.1 of the current CDP recognise the critical importance of businesses, and the need to support economic growth and provide a range of opportunities for business activities to establish and prosper. Plan Change 20 does not meet these objectives, rather it seeks to minimise industrial activities.

The Fuel Companies agree with the need to manage effects at the interface of residential and industrial zones. This means protecting residential zoned areas from new industries and activities being established in adjacent zones, but it also means protecting established activities in the industrial zones from reverse sensitivity effects, including from residential development and intensification in the adjoining zone. The changes only the former and do not afford sufficient recognition and protection of established activities in the industrial zones, including any necessary upgrade or redevelopment to those activities. While they generally support the intent of the draft changes to the industrial zone objectives and policies (section 16.2), these changes need to be looked at in tandem with reverse sensitivity provisions applying to the residential zones so as to not inappropriately restrict the industrial zones for its intended purpose, being industrial type activities.

A metal recycling business considers safeguards are needed to ensure that those established industries operating within the law are protected from unnecessary reverse sensitivity issues.

A construction and industrial property ownership firm and an industrial property owner consider the draft risks institutionalising reverse sensitivity constraints on established industrial areas.

Ravensdown fertiliser manufacturer considers PC20 seeks to institutionalise reverse sensitivity effects to the potential detriment of industrial activities within the City i.e., residents buy a house near a long-established industrial area, complain about industrial activities, and then Council responds by placing further limitations on the legitimate use of industrially zoned land for normal industrial activities. They consider that statutory planning documents recognise that cities do not just provide places for people to live, they also need to recognise and provide for people to work, including at industrial activities and provide for the full range of activities that are associated with urban environments. It is also necessary to recognise that large-scale industrial activities, such as the Christchurch Works, cannot just be established somewhere else. Whilst Council's capacity modelling (in accordance with NPS-UD requirements) is understood to show a surplus of industrially zoned land, large industrially zoned sites (i.e., more than 10ha in area), characterised by flat land which is close to transport networks (and especially the rail corridor), and set back from sensitive receivers (i.e., waterbodies, residential activities) is virtually non-existent within Christchurch City, and nearby districts. Thus, ensuring that existing and new large-scale industrial activities, in industrial zones, can continue to thrive is important (as recognised by Strategic Objective 3.3.5 and Objective 16.2.1 of the CDP). While making this observation, Ravensdown, is committed to continuing to operate the Christchurch Works at its site in Hornby for the foreseeable future.

A commercial property owner is concerned, as a major property owner and operator, with the impact that Draft PC20 would have on its property in Hillsborough, and the efficient use and development of the Industrial zones in Christchurch more generally.

A GIB manufacturing company comments that the current zoning has afforded them permitted activity status for its landuse activities over several decades. It is critical that the zone provisions continue to provide for their activity as a permitted activity to afford certainty for their continued and future viability at this site.

A commercial property owner comments that industrial activities have unique characteristics, needs, and effects. Industrial land needs to be relatively flat, have efficient access to freight routes, rail or freight hubs, ports or airports, and efficiently served by infrastructure. This is reflected in the location for industrial activities in a broader urban context. Industrial activities need to be specifically recognised and provided for in planning documents to promote economic development, enable the efficient use of buildings, land and infrastructure in Industrial zones, manage conflict between incompatible activities, and recognise the locational requirements of some industries. There are also agglomeration benefits by the co-location of industrial activities. This is provided for by appropriate Industrial zonings, which recognise the importance and characteristics of industrial activity and set appropriate objectives, policies, and rules to enable these activities to establish and operate. Unique needs of industrial activities include (but are not limited to): (a) High volume of traffic movements (including heavy vehicles) and the use of heavy vehicles and machinery on site; (b) The ability to generate noise, either as a result of the activity directly or through use of machinery and equipment necessary for those activities; and (c) The ability to generate other effects which may reduce amenity, such as odours and dust. The characteristics of industrial activities can give rise to reverse sensitivity effects if more sensitive activities seek to locate or intensify in close proximity. To provide for the efficient use of industrial land, reverse sensitivity effects must be appropriately managed. This must recognise the operational need of industrial activities, investment in existing industrial zoned areas, and the essential role that industrial activities play in the economic growth of Christchurch.

Need to consider economic contribution of industrial activities	A <u>metal recycling business</u> considers the present economic contribution of the Woolston industrial base to the immediate Woolston community and to Christchurch overall needs to be considered as well as the ability for residential intensification in the immediate vicinity of the Woolston industrial land. Safeguards are needed to ensure that those established industries operating within the law are protected from unnecessary reverse sensitivity issues. A <u>commercial property owner</u> comments industrial sites play a crucial role in the economic landscape of Christchurch, particularly in the context of rebuilding and regenerating Christchurch following the 2010 and 2011 earthquakes, and in growing sectors such as advanced manufacturing. Advanced manufacturing in particular employed 36,300 people and contributed \$4,128,000 million to Canterbury’s GDP in 2019. The Canterbury population is expected to increase by 25% between 2018-2048, fuelling the Christchurch economy, and advanced manufacturing is one of the biggest sectors. There continues to be a shortage of industrial land in Christchurch and the industrial vacancy in major markets is some of the lowest globally, with Christchurch at 1.7% in 2025. However, investor appetite for industrial assets remains strong. The importance and role that industrial land and activities play in Christchurch’s economy, has been recognised in higher-order planning and policy documents, including in RPS objectives 5.2.1, 6.2.6, 6.3.6, as well as in the LURP.
Favouring residential activities at detriment of industrial activities / the burden is on the wrong party	A <u>commercial property owner</u> considers the draft strongly favours residential activities where they have an interface with industrial activities. While the provisions appear to better manage adverse effects on amenity at zoning interfaces, in practice, these provisions will be detrimental to the efficient operation of industrial activities located within Industrial zones. A <u>warehousing and manufacturing business</u> is concerned that their zoning and consent rights can be diminished by the entry of residences that have some strange notion that they may wish to have rights that impact upon existing businesses. A <u>transport and logistics company</u> and a <u>national road freight association</u> consider restricting existing industrial activities to mitigate poor residential property design is putting the cost and compliance burden on the wrong party. A <u>transport and logistics company</u> considers the imposition of further restrictions on existing businesses is an unfair shift in the goalposts and would unduly penalize local businesses that provide essential services to the people of Christchurch, and wider New Zealand. They consider that imposing these restrictions on businesses operating in long-established industrial zones is unfair and disproportionate. The challenges faced by residents who have knowingly chosen to live near industrial areas should not result in undue hardship for the businesses that have been operating in their designated zones. Two <u>metal recycling businesses</u> are concerned that the onus to resolve the issues raised by a relatively small number of complaints is being placed onto businesses, even when they have not breached any of their requirements. <u>Ravensdown fertiliser manufacturer</u> considers PC20 prioritises residential amenity and is seeking to deliver a level of amenity at the interface with long-established industrial areas that are commensurate with a non-industrial context. This issue identification approach has led to a proposed ‘solution’ which sees industrial activities ‘bearing the brunt’ of regulatory control as a means of addressing these effects. They comment that as an industrial activity that has been located at its current IHZ site for over 100-years, they are concerned that the driver for PC20, which will directly impact industrial activities appropriately located in industrial zones, is the management of effects on residential activities, with little thought given to the implications of the plan change on existing industrial operations.
Costs will fall solely on industrial land users	An <u>industrial property developer</u> considers the costs potentially introduced to industrial land users as a result of this plan change will fall solely on those users. They are concerned that the change in emphasis to improving residential amenity is likely to impose unreasonable costs and inefficiencies of site use on industrial landowners and occupiers. A <u>national road freight association</u> is concerned that the Change Proposal puts the responsibility of mitigating noise on existing local industrial businesses rather than requiring the developers of new residential developments to include adequate acoustic mitigation. A <u>transport and logistics company</u> considers the activity of industry has not changed. The council's imposition of these restrictions disproportionately impacts businesses, whose operations benefit the broader community and economy.

Penalising industry when sites are zoned for industrial uses / undermining role and purpose of these zones	A <u>commercial property owner</u> considers the draft provisions appear to penalise industrial activities for locating in proximity to residential areas, even though the site is zoned for industrial use. An <u>owner of vacant land to be developed</u> considers land where purchased with commercial intentions and terms; where zoning rule changes that has commercial impact are unfair as the land was commercially purchased based on pre-established terms and parameters. A <u>demolition company</u> and an <u>industrial land owner</u> request consideration of the unintended consequences of the amendments sought in the draft PC20, noting the purpose of Industrial zones is to facilitate economic growth and employment, whilst recognising a managed response at the interface. Two <u>metal recycling businesses</u> comment that industrial zones already provide for industrial activities that may generate noise, odour, and traffic movements etc. with existing operating requirements for the businesses within them. Industrial zones have not changed in Christchurch, it is the residential zoning which has. A <u>construction and industrial property ownership firm</u> has concerns with the form and nature of several of the amendments included within draft PC20, specifically as these relate to undermining the role and purpose of Industrial zones within Christchurch City. They consider the draft provisions burden industrial land development with amenity expectations that are not commensurate with the purpose of the zone, or equitable with commercial land development in Christchurch.
Unclear how existing use rights will be applied / plan change could impact existing businesses	Two <u>metal recycling businesses</u> are concerned about the impacts the changes will have on their operations, especially how the new changes will be applied to existing businesses is unclear. If Plan Change 20 is passed, it technically becomes the ‘current rule’ and may therefore be applied to their existing business. The <u>NZ Association of Metal Recyclers</u> considers there is a lack of clarity about how existing use rights will be respected. The Council must, in its Section 32 analysis, be more specific in how it intends to apply a significance test to existing users. Without a significance test, Council staff cannot begin to quantify the economic impact of the new requirements. <u>Ravensdown fertiliser manufacturer</u> considers that PC20 has the potential to place new requirements on its operations at the Christchurch Works. This is due to the fact that any development activity within the site will need to consider the implications of PC20 given that the majority of the site falls within the 200m interface from the RSZ on the other side of Main South Road. In addition, given the difficulty in establishing lawfully established noise levels at industrial sites (in the absence of consistent noise monitoring stretching back 100-years), the noise related provisions of the PC20 also have the potential to be applied to the Christchurch Works. A <u>GIB manufacturing company</u> consider that the draft provisions will, if pursued, result in consequences for all industrial activities that have impacts that essentially extinguish existing use rights going forward and render the Industrial Heavy Zone no longer fit for purpose across the City. An <u>individual with interests with the Industrial General zone</u> considers it impinges on the existing property rights of industrial property owners with its major focus on residential owners. Some industrial property owners may ultimately need to seek resource consent approvals to continue activities that have been long established at their properties and for future uses. Doing so is a costly and uncertain undertaking. A <u>demolition company</u> and an <u>industrial land owner</u> considers the Plan Change would generate a number of regulatory hurdles on existing Industrial zones in the City, requiring both established activities (there is a retrospective element to the proposed noise provisions) and new development. The provisions as drafted would unreasonably constrain activities or usable land on zoned Industrial land to accommodate the sensitivities of adjoining residential zones. Similarly a <u>construction and industrial property ownership firm</u> consider the draft provisions inappropriately constrain appropriate and anticipated industrial activities.
Unclear what qualifies as a change to a business	Two <u>metal recycling businesses</u> query what would be considered a change to the business and whether upgrading a piece of plant or machinery qualify as a change. As a vital Canterbury business, they would like to continue to grow their operations, to employ more people and provide more services to their community, however there is no certainty which is problematic and unfair to employees and customers.

	The <u>NZ Association of Metal Recyclers</u> considers if any change made to an operation could trigger the requirements of the plan change and decisions on this would be made “on a case-by-case basis.”, there is no certainty for operators which seek to modernise or improve their businesses, which seems grossly unfair. Something as simple as upgrading a piece of processing equipment could be deemed ‘significant’ by Council and the new zoning requirements would be applicable.
Economic and financial costs including: restriction of growth and redevelopment, inability to adapt to the market, logistical challenges, supply chain and land inefficiency, weakening companies, loss of jobs, impact process improvements, restrict industrial area’s diversity, viability and comparative advantage, increase land and transaction costs, uncertainty	A <u>construction company</u> comments that they need flexibility to adapt to changing construction requirements as projects come and go and their business adapts to the market so any rules that make this adaptability harder will cost jobs in the long run and make projects the council wants to deliver more expensive. A <u>warehousing and manufacturing business</u> seeks recognition of the economic and financial impact of any changes to zoning etc. The draft has economic or financial cost impacts which all collectively serve to reduce the competitive edge of the products or services that are produced at the site. That will in turn weaken the companies, reduce the employment opportunities, and give special privilege to a residential group which hardly seems fair and equitable and will not assist in the improved economic welfare of the region. <u>Lyttelton Port Company</u> considers for regionally significant infrastructure including CityDepot, the draft has potential to disrupt supply chain efficiency, increase costs, and create logistical challenges (for example, limitations on night-time operations and vehicle caps have the potential to impact LPC’s ability to manage peak freight demands). They consider imposing restrictions on well-established and legitimate industrial activities is overly blunt and risks undermining the essential operations that are critical to the economic development and functionality of the City and wider region. The provisions will be applicable to any future activities (or changes to the scale or intensity of existing activities) in industrially zoned areas once they become operative. They comment that the proximity of CityDepot to small pockets of RS and RH zoning raises significant issues. If implemented in their current form, the changes proposed as part of PC20 may adversely affect both existing operations and future developments at CityDepot. A <u>national road freight association</u>, which has members and associates based in Christchurch including road freight transport businesses, scrap metal recyclers, and container park operators, comments that members are concerned that the changes will severely impact the economic viability of their operations and disrupt the local supply chain. An <u>individual with interests in the Industrial G zone</u> considers if approved it will financially impact many industrial property owners negatively and in some cases could cause significant financial loss and is hardly helpful to the local economy. Two <u>metal recycling businesses</u> consider there are several requirements in the draft that will negatively impact upon their business. If industrial activities cannot be reasonably undertaken in industrial zones, the market value of the metal recycling businesses will be reduced, and the restrictive requirements of the Plan Change will mean that businesses will be less likely to introduce processing improvements. Moving sites is also problematic as recycling services like metals recycling need to be easily and readily accessible to their communities. An <u>owner of commercial buildings</u> is concerned how the draft could impact the future use of their sites in Woolston. The <u>NZ Association of Metal Recyclers</u> considers if industrial activities cannot be reasonably undertaken in industrial zones, the market value of the metal recycling businesses will be reduced and the restrictive requirements of the Plan Change will mean that businesses will be less likely to introduce processing improvements. There will also be a reduced incentive to expand recycling operations or to relocate them to other sites within the Council’s boundaries. A plan change, once operative, will impact all metal recycling operations within Christchurch in perpetuity. The <u>Fuel Companies</u> consider the Plan Change could push service stations into zones that are potentially less suited to the activity or require resource consent for otherwise permitted activities. A <u>construction and industrial property ownership firm</u> considers that the Plan Change will reduce the diversity, viability and comparative advantage of Industrial areas, particularly those that adjoin existing residential zones, reducing the opportunities for (re)development. They also consider that the Plan Change will reduce land use efficiencies regarding the provision of Industrial land required to meet demand, increasing transaction and average land costs. They consider the provisions seek to introduce further uncertainty and transaction costs associated with industrial land development.

	An <u>owner of vacant land to be developed</u> considers with the price of land in the central Christchurch area, land needs to be optimised. So compromising the development opportunity based on setbacks or resource consent is not fair; especially for their site, which actually have a greater separation from residential area with the overpass. Blanket cover will impact the commercial value of the land and if such is the case, they at minimum want a dispensation of compensation. Ultimately they want to keep and use the land. A <u>demolition company</u> and an <u>industrial land owner</u> consider the consequential risks are underutilisation and inefficiencies associated with existing Industrially zoned land adjoining residential properties, disenabling stimulation of industrial activities and long term economic and employment growth as associated with these zoned areas. Similarly, a <u>construction and industrial property ownership firm</u> consider that that the additional amenity (landscaping requirements and noise) constraints fail to account for the purpose and outcomes anticipated within Industrial zoned areas of the City and will disenable stimulation of industrial activities and long term economic and employment growth. A GIB manufacturing company considers the draft will have direct implications on the level of permitted activities that can occur on their Opawa Road site and in turn, impact on the level of certainty the operation has for the future. They are also concerned with the increased consenting and mitigation requirements that either future expansion or intensification of their operation will be faced with and the further uncertainty that brings for their tenure.
Industry will shrink / be forced out of existing industrial areas	A <u>metal recycling business</u> considers if the Council continues to reduce the ability of industry to operate in the Woolston area through increasing the industrial rules, it will eventually force industry out of the area completely. A <u>transport and logistics company</u> and a <u>national road freight association</u> consider with increasing three-story plus residential development in Christchurch, the Christchurch City Council's approach cannot be to force industrial activity into smaller and smaller permitted areas, with increasingly restrictive operating rules, if it wants to sustain regional economic growth above the national average.
Regulation should be reduced given wider impacts	One <u>resident</u> seeks a reduction in regulation given that it doesn't consider the wider impacts such as increase the distances from peoples jobs, worsening traffic, encouraging car ownership and will result in inefficient use of land in the city, making land more expensive, housing more expensive, in addition to the cost of running a business.
Need to recognise lower levels of amenity is historic / expected in these existing locations / reflects property values / it's recognised in the Plan	<u>Lyttelton Port Company</u> consider the existing residential areas in Woolston / Hillsborough are already experiencing lower levels of amenity for various reasons, including their proximity to industrial and rural activities, as well as state highways and the rail network. Consequently, these sites will be subjected to higher levels of activity, noise, lighting, odours from farms, and traffic fumes etc. They consider given the Port's role in supporting both regional and national economies, constraints should be carefully considered in order to balance industrial needs with residential amenity protections, particularly in an area such as the Woolston / Hillsborough industrial area, where residential amenity is already likely perceived to be low. <u>Ravensdown fertiliser manufacturer</u> considers the new landscaping requirements reflect a desire to improve the visual amenity of industrial zones by way of more intensive plantings, without acknowledging that the CDP does not anticipate a high level of amenity to be required within the zone. A <u>transport and logistics company</u> considers residential property owners who purchased properties at the interface were fully aware of the pre-existing industrial zoning. The presence of industrial activity in these areas was not an unforeseen activity, and it is reasonable to argue that the lower purchase price of residential properties near industrial zones reflected the trade-off of proximity to such zones. It is important to note that homeowners in close proximity had the opportunity to perform independent due diligence prior to purchasing their properties, ultimately assessing the potential impacts of living near industrial zones for them personally. It is worth noting that existing residents who have purchased properties near industrial zones did so with the knowledge of the inherent characteristics of industrial areas, such as noise, traffic, container storage, visual disruption, etc. A <u>GIB manufacturing company</u> considers the approach of the draft plan change is diametrically opposed to the current and long-standing understanding that the operative plan takes which seeks to manage the expectations of the residential community who occupy dwellings next to industrial zones that there is a level of reduced amenity at the interface.

	An <u>individual with interests in the Industrial G zone</u> comments that residential and industrial zones have existed for a very long time in most instances. Given this owners of residential properties almost certainly purchased their properties with the knowledge of industrial activities on their boundary. The amenity value of these properties was therefore always compromised resulting in them being able be purchased at a discount by comparison to a similar property in a ‘pure’ residential area. This discount is no different for example to properties adjacent to railways lines, busy intersections and on main arterial routes, lower amenity value equals lower value. An <u>industrial land owner</u> considers inevitably residential activities adjoining industrial zones will invoke a reduction in character and amenity in comparison to residential activities that do not adjoin an established Industrial zone and is typically reflected in both the existing zoning patterns, and price of these households. Two <u>metal recycling businesses</u> comment that property prices reflect the ‘drawbacks’ of the residential property location in these instances, and that residents who purchase properties in these areas should do so with an understanding of the trade-off they are making for the lower purchase price they are paying. <u>Ravensdown fertiliser manufacturer</u> acknowledges that the adverse effects of industrial activities in industrial zones need to be appropriately managed to support the outcomes anticipated for the zones. In this context, the outcomes for industrial zones differ from those for other zones, which in turn means that sites adjoining industrial zones will not have the same level of amenity as anticipated in other zones (i.e., residential zones). These matters are reflected in Objective 16.2.3(a) and Policy 16.2.3.(b) of the CDP. PC20 seems to be intending to turn this approach ‘on its head’.
Additional controls are unnecessary / current rules are adequate	<u>Waterloo Business Park</u> consider further controls on industrial activities which are generally acknowledged to not create problems for adjoining non-industrial zoned sites is unnecessary and creates additional bureaucracy for both general ratepayers and the landowners. An <u>industrial property developer</u> considers the rules as they stand are working fine. <u>Lyttelton Port Company</u> consider the existing District Plan framework for the IG and IH zones for the Woolston / Hillsborough industrial area, should be preserved for the following reasons: The current zoning is well-suited to the types of activities undertaken in this area. The area is strategically located and well-served by transportation links, particularly regarding access to the Port. This particular location has several overlays and activities, including the Woolston Risk Management Area overlay. This overlay addresses the presence of hazardous substances and mandates necessary setback areas for sensitive activities, such as residential use. Additionally, the proximity to the State Highway and rail network requires that sensitive activities be set back from these areas to mitigate conflicts with noise and other disturbances. The reduction of valuable industrial zoning adjacent to the State Highway 74 / 76 interchange and railway, necessitated by setbacks from nearby residential areas that likely possess lower economic value due to their size, location, and access, is, in LPC’s view, inappropriate for this particular site. A <u>GIB manufacturing company</u> consider the existence of a residential zone directly adjoining industrial zones has been in existence for 60 years and the use of the ‘general industrial’ zones being used as a ‘buffer’ between the residential and heavy industrial zone is an appropriate mechanism to manage reverse sensitivity effects of these two zones which has continued to be ratified by Council over the numerous iterations of the City Plan. A <u>vehicle dismantling company</u> queries why change rules which have been operational in a satisfactory manner for many years. Unless it will make significant improvements then shelve it. A few noise complaints does not justify the expenditure on council and effects on landowners and future users. Focus on the need to have, not being a hindrance.
Do not progress plan change	A <u>commercial property owner</u> opposes Draft PC20 in full and seeks that the Council does not proceed with notification of PC20. A <u>national road freight association</u> is opposed to the draft Change Proposal (Option 2). A <u>GIB manufacturing company</u> is strongly opposed to the overall direction of the draft plan change that is seeking to manage reverse sensitivity effects at the Residential/Industrial zone interface by restricting the level and type of activities that can take place within the Industrial zones. They strongly opposes Draft Plan Change 20: Industrial Interface in its entirety. A <u>construction company</u> comments that they oppose any increased rules that hamstringing their business.

	A <u>warehousing business</u> comments that they would be very upset if the district plan was to change as it potentially limit what business they can operate from their Sturrocks Road site. An <u>individual with interests in the Industrial G zone</u> does not support the plan change in its current form. The <u>Fuel Companies</u> do not support PC20 in that its potential impact on activities, such as service stations, is not proportionate to the actual and potential effect of those activities on amenity values and may not alleviate the problem that PC20 is purporting to address. <u>Waterloo Business Park</u> considers that the Plan Change is a “blunt” instrument that affects all industrial zoned land and strongly opposes all aspects of the Plan Change.
Plan change is not justified under s32 of RMA / complaints should not be the basis for the change / it does not align with higher order documents	An <u>industrial property developer</u> considers the costs do not stack up in terms of Section 32 of the RMA. <u>Lyttelton Port Company</u> comments with respect to section 32 of the RMA, there is a need to robustly assess whether all appropriate land use planning measures and strategies have been thoroughly examined to effectively manage the interface between industrial activities and residential zones, particularly in the Woolston / Hillsborough industrial area. With respect to the draft PC20, LPC asserts that the Council has not given sufficient consideration to the considerable economic value and long-term benefits associated with the well-established and legitimate industrial activities currently in operation at this site, especially when compared to the potentially lower economic value of the adjacent small residential zones. They comment the importance of regionally significant infrastructure, including CityDepot, is recognised in the Regional Policy Statement and the District Plan. The <u>NZ Association of Metal Recyclers</u> considers without additional detail on more recent complaints, the Council has not provided sufficient information to justify why a plan change is the appropriate course of action. Three <u>metal recycling businesses</u> comment that given the apparent lack of justification for the changes, they question whether Plan Change 20 is appropriate as a solution at all. There is no clear explanation for why the Council have now deemed it appropriate to undertake a change to the District Plan. The analysis of complaints does not support the need to change an entire district plan. They consider that to some degree, complaints from residential dwellings against commercial activities are inevitable, especially in areas where properties are near industrial zones. It appears that all complaints are being counted as evidence of the need for Plan Change 20, regardless of whether the complaint was founded or not. If a complaint is made, but is unfounded under the current noise limits, is it unreasonable to change the rules and place extra burden on business who are compliant just to appease a small minority. In many aspects the proposed changes go against the advice and recommendations that the CCC has had to date. Even if all 45 noise complaints that are detailed in the CCC Memo of 22 September 2021 were assumed to be ‘founded’, the fact that 10 of these complaints were effectively resolved by discussing the situation with the business concerned indicates that the current district plan is effective. If consider the location in which these 10 complaints were resolved, they represent 72% of the complaints laid in the area (Belfast). The balance of complaints in this location were also resolved through engagement with the business concerned under the current District Plan rules. The noise complaints detailed for the other areas generally note that the businesses concerned are operating within the required limits and were compliant with the current district plan. Furthermore, on 22 September 2021, Mark Stevenson (Team Leader, City Planning), advised the Council that ‘These investigations found 12 complaints received between 19 January 2017 and 23 April 2019. The issues identified were primarily related to noise (clanging of metal and droning of machines) while visual amenity, rubbish blowing into residential properties and dust were each also mentioned on at least one occasion. The complaints related to noise resulted in Environmental Health Officers attending the site and undertaking noise measurements, which indicated that in some instances there were breaches of the District Plan noise limits.....the nuisance issues of noise and dust identified from monitoring are not the result of ineffective District Plan provisions. Given this, they struggle to understand the justification behind the proposed changes to the district plan, especially those that appear to directly target metal recycling facilities. If a complaint is made, but is unfounded under the current noise limits, is it unreasonable to change the rules and place extra burden on business who are compliant just to appease a small minority. In many aspects the proposed changes go against the advice and recommendations that the CCC has had to date. As noted on page 7 of the Acoustic Engineering Services Limited ‘Industrial Residential Interface -Review of Potential Noise Issues’ report, ‘The CDP approach for controlling industrial noise received in Residential Zones is consistent with the relevant guidance for the protection of residential areas from adverse noise effects. The standards referred to in the CDP are current New Zealand Best Practice and consistent with the National Planning Standards directions.’ Why then is the CDP being changed? They do not believe 57 complaints over a 2.5-year period, most of which appear unfounded, is a good enough justification for making changes to the CDP that will significantly impact upon current and future businesses.

	A <u>commercial property owner</u> considers the changes are contrary to the provisions in the RPS to provide for industrial activities, and will undermine the objectives, policies, and purpose of the Industrial zones and inappropriately constrain industrial activity despite its value and importance to the Christchurch economy. A <u>demolition company</u> and an <u>industrial land owner</u> considers the changes are not appropriate to achieve the overall Objectives of the Plan, nor give effect to the relevant provisions of the Canterbury Regional Policy Statement specifically those that seek to promote the utilisation and redevelopment of business land. A <u>construction and industrial property ownership firm</u> considers that an appropriate and thorough s32 analysis has not been undertaken to support the amendments and that the changes do not achieve and implement the higher order statutory framework. A <u>demolition company</u> and an <u>industrial land owners</u> consider the draft is neither effective nor efficient in achieving the Objectives and Policies of the Plan, specifically Objective 3.3.1 and Objective 3.3.10, and runs counter to the outcomes expressed in Objective 16.2.3(a) [PC2 Objective 16.4.3] and Policy 16.2.3(b) [PC20 Policy 16.4.3].
Controls further internalise effects	<u>Waterloo Business Park</u> considers the draft seeks to impose further restrictions and controls on industrial activities in order to still further “internalise” effects, rather than have effects, even of a more minor nature, spread over non-industrial zoned land. Such effects are currently legal within the provisions of the existing Plan. The draft imposes further restrictions on the type of activities, and the effects of those activities within sites zoned Industrial – especially Industrial General Zoned sites which abut residential or rural zoned sites.
Controls being imposed regardless of distance to non-industrial zones	<u>Waterloo Business Park</u> considers the basic fault with the draft is that it seeks, in some instances, to impose “blanket” controls on all Industrial General Zone, Industrial Heavy zone, and Industrial Park Zone, regardless of the distance from non-industrial zoned land. A <u>company that leases warehousing and ancillary retail</u> and a <u>warehousing, online sales and ancillary retail business</u> consider this amendment proposes changes to all Industrial zoned properties when the vast majority are nowhere near residential properties.
Not clear what effects rules would manage / what the purpose and resource management issues are	A <u>waste company</u> considers it is not entirely clear from the plan change what effects some of the proposed rules are trying to manage. A <u>GIB manufacturing company</u> considers the proposed amendments do not address the resources management issues identified. A <u>construction and industrial property ownership firm</u>, a <u>demolition company</u> and an <u>industrial land owner</u> are concerned that the purpose, and significant resource management issues to be addressed by the Plan Change are not adequately expressed.
Why progress PC when not recommended in previous advice	A <u>transport and logistics company</u> and a <u>national road freight association</u> query why it is the preferred option being considered, when previous Christchurch City Council advice (Memo 21/1305274) considering requiring resource consent for metal recycling and dump yards in any industrial zone or requiring additional standard for these activities recommended that “neither option would be the most appropriate way to achieve those objectives and has costs that may outweigh any benefits”. A Memorandum AC22386 “CCC Proposed Plan Change 14 – Industrial-Residential interface Review of proposed noise insulation rules” dated 20 February 2024 from Acoustic Engineering Services to Christchurch City Council noted that “A solution to the issue of potentially louder noise levels at the third storey (and above) or new buildings is to require the new building to have noise insulation to achieve appropriate internal noise levels.”
No relationship between issues and some of the controls	<u>Waterloo Business Park</u> considers the draft has been prepared in response to some concerns and complaints in relation to a metal recycling and dumping yard, and a shipping container depot and there appears to be no relationship between these complaints and some of the proposed changes e.g. changes to the definition of industrial activities, restrictions on retailing, health care facilities, education activities, guest accommodation, residential accommodation etc. The alternative approach can be achieved by targeting the specific activities. A <u>company that leases warehousing and ancillary retail</u> considers the changes to ancillary retail operations seems completely unrelated to the problem the amendment is purporting to address and has not been widely notified. An <u>individual with interests in the Industrial G zone</u> considers the draft plan change’s scope seems disproportionate to the issues it sets out to deal with.

Replace blanket approach with controls only on specific activities	<u>Waterloo Business Park</u> considers that only those activities subject to specific concerns having been raised, such as metal recycling and dumping yards, and shipping containers, should be affected by any final agreed Plan Change provisions. It is considered a “knee jerk” reaction to undertake a blanket approach on all industrial-zoned land and activities and impose zone-wide restrictions, at the detriment of a few activities that have been highlighted in the media. If further controls are necessary, they should relate only to a suitable distance, and location, and specific activities, in relation to non-industrial sites, not to all Industrial zoned land. An <u>industrial property developer</u> has heard that it's container storage that's driving this plan change and if that's the case, address container storage specifically rather than imposing unreasonable rules on the entire industrial zone. One <u>resident</u> seeks that 24/7 container storage and transport yards and bus depots should not be allowed next to a residential zone without adequate physical barriers and technology to mitigate loud noise, and diesel fumes. A <u>warehousing, online sales and ancillary retail business</u> considers managing the industrial interface but only in situations where certain very specific industrial activities adjoin homes which is not the case for most properties in the Industrial zones. A <u>waste company</u> considers if inland ports are the issue that the draft is trying to manage there should be a specific rule for this activity rather than capturing other activities under the container yards definition. The outdoor storage rule changes appear to be related to the inland port activity. These draft rules are confusing and unclear in their application, future compliance and effectiveness. Two <u>metal recycling businesses</u> suggest businesses be dealt with on a case-by-case basis. Not all metal recycling operations are the same. Some are large with a wide range of heavy industrial equipment, while some are small with only simple plant and machinery like forklifts. The draft Plan Change seeks to label all scrap metal recycling operations as “Heavy Industrial activity” but that is not suitable, and unfair. The classification of the business should be based upon the operations of the business, not the generalisation of an entire industry. In fact, creating a ‘list’ of industries is an antiquated approach and the Resource Management Act 1991 sought to rectify this by seeking to control activities based on their effects. The <u>Fuel Companies</u> consider the Plan Change is a potential barrier to service station activities but are unlikely to be the root cause of issues at the residential-industrial interface. Currently, there is no information available to suggest that service stations are part of the problem that PC20 is attempting to address, noting that service stations are not specifically industrial activities but are generally compatible with industrial activities.
Unfair to single out metal recycling yards	Three <u>metal recycling businesses</u> are concerned that metal recycling facilities have been repeatedly and unreasonably highlighted as the need for a District Plan change and consider that metal recyclers have been unjustly singled out.
Strengthen enforcement	A <u>national road freight association</u> comments it appears that insufficient acoustic mitigation and screening from property developers (particularly for three-story residential buildings) is causing an increase in noise complaints. They encourage consideration of whether the noise complaints could be effectively addressed through more effective enforcement of noncompliance, rather than through rule changes. They note that in Memo 21/1305274 “Managing industrial activities in the District Plan” dated 22 September 2021 from Team Leader – City Planning to Mayor and Councillors, para 3.8 noted: “The nuisance issues of noise and dust identified from monitoring are not the result of ineffective District Plan provisions. They were attributed to non-compliance with existing rules on noise or are managed by ECAN under the regional plan.” A <u>transport and logistics company</u> and the <u>national road freight association</u> consider more effective enforcement can achieve improved outcomes at a lower cost, without the adverse implications to the economy. The <u>NZ Association of Metal Recyclers</u> questions whether a lack of Council enforcement is the issue. The Association values and expects compliance with the law and would expect member companies to consider site improvements and to work through mitigation on a case-by-case basis. Two <u>metal recycling businesses</u> suggest better enforcement of CDP be a better first step.

Need to recognise that new residential areas encroach on existing industrial areas	A <u>commercial property owner</u> considers the draft provisions fail to recognise that the residential use may have encroached into an industrial area. A <u>warehousing and manufacturing business</u> query why residences that move to a zoned area knowing it contains industrial entities, then have some ability through changes to a district plan, to diminish the rights of industrial entities. The danger is that the rights of residences will be held above those of the industrial companies. Do the residences not appreciate that that activities of these companies directly and indirectly contribute to the welfare of residences through the tax and rates revenues that they create for development of infrastructure, the establishment of schools, hospitals and other amenities for the use of residences. The continual unabated growth of the residential market is destroying the economic base of the region by removing land from the industrial zoning, altering the zoning to make industrial activity less viable. People need to recognize that we all have rights and changing one person's rights by denying another person's rights is grossly unfair and inequitable. Regulation upon regulation, zoning changes and alterations to permitted activity should not be allowed simply because some later arrival of a resident gives rise to a complaint. Care is necessary simply to ensure that the rights of those later residential arrivals do not trample over the rights of businesses that have been in the area for many years.
Need to recognise use of residential areas can change over time	A <u>commercial property owner</u> considers the draft provisions fail to recognise that that a residential ‘enclave’ may appropriately change in use over time.
Some residential sites should be rezoned to industrial	A <u>truck dealership business</u> encourages consideration of the age and condition of the buildings on the residential zoned land that has shared boundaries with industrial land, as there is a good possibility in some situations like their yard boundary it may be better for the residential property owners to change the zoning on this property to industrial when it suits them, so they are able to sell or repurpose these properties in the future for industrial use, and eventually remove any residential / industrial boundary problems. <u>Lyttelton Port Company</u> consider a more nuanced approach to managing amenities in the Woolston / Hillsborough industrial area should be considered as part of a thorough Section 32 analysis. Alternatives, such as re-zoning the land to the south and west to change its classification from residential to industrial, may be a prudent and more efficient way to address the residential-industrial interface in this area over the long term. This should be determined through a comprehensive cost-benefit analysis. They expect that it would find that small pockets of residential land with low economic and amenity value (due to their size, location, and access) do not outweigh the significant economic and long-term benefits provided by the well-established and legitimate industrial activities currently taking place. The presence of industrial operations at this location supports vital economic activities, such as logistics, manufacturing, and other sectors that drive growth and job creation, and make a significant contribution to the broader regional and national economy. It is LPC’s view that it would be appropriate as part of any notified plan change to evaluate all of these factors on a site-specific basis rather than implementing uniform regulations across all industrial zones; an approach that PC20 does not appear to have taken to date.
Future development should be incentivised in preferred locations	One <u>resident</u> seeks if restrictions are proposed that it directs future industrial development to major roads or preferred areas of the city in the form of incentivizing industrial business firms to use these thoroughfares.
Existing zoning and controls should remain except where developing on rural fringe	An <u>owner of vacant land to be developed</u> respects that there are many blurred boundaries between industrial and residential areas particularly in Yaldhurst and Russley area. To blanket add them to those area are not fair and appropriate and will impact on their business's commercial performance. Land that is zoned particularly in established areas should stay the same; however land that are to be developed or zoned needs to be reviewed; particularly the rural fringe, which is where most of the rezoning are taking place.
Focus on areas next door or across the same street	A <u>warehousing business</u> considers the proposal should speak to areas where the housing is next door or across the same street from industrial zones, where traffic and pedestrians are directly impacted. A <u>company that leases warehousing and ancillary retail</u> considers the proposal should be confined dealing with housing next door, or close to, land where industrial activities are happening. A <u>warehousing, online sales and ancillary retail business</u> considers the proposal, if it were to proceed in any form, should be confined to dealing with housing next door, or close to, land where industrial activities are happening.

Encourage smaller industrial activities and smaller sites given trends	A <u>vehicle dismantling company</u> comments that their site has an old industrial building placed on it that in coming years will be removed and development can take place. A number of smaller industrial activities should be enabled to occur. Industrial uses are not only changing but becoming more efficient with off-site storage and logistics. Smaller sites may be require more frequent vehicle movement of stock, etc.
For expanding businesses apply zoning rules at time of establishment and apply new zoning for redevelopment	A <u>warehousing and manufacturing business</u> considers it is possible that existing business may need to expand to meet growing demand. Where that arises then consents should be considered under the zoning rules that were applying when the initial business commenced operation. If an entirely new business was to be established that had no attachment to the existing activity, then the new planning changes might apply.
Support alternative options 4,1 and 3 (in that order)	A <u>national road freight association</u> supports , in descending order of preference: Option 4 (A different plan change that puts controls on residential zones). Option 1 (No change – rely on the current policies). Option 3 (Correct errors, improve the clarity of rules and make minor changes to existing rules at the interface, including a new outdoor storage height and greater landscaping).
Need to support non-industrial commercial activities in industrial zones	A <u>self storage/proposed hotel business</u> support efforts to improve the industrial-residential interface, however would like to ensure that new regulations do not unintentionally restrict well-managed, low-impact businesses. A balanced approach that differentiates between heavy industry and commercial accommodation would help ensure fair and practical outcomes. PC20 should consider allowing low-impact commercial accommodation and wellness businesses as permitted or discretionary activities within industrial zones that border residential areas. These businesses do not generate the same concerns as heavy industry and can contribute positively to the area. Additionally, flexibility in noise and operational rules for non-industrial businesses would help balance growth with residential amenity. They consider the plan change introduces new restrictions on noise, access, or operational flexibility that may limit Motel X's ability to operate and expand within the Industrial General zone, however this business does not create the same environmental or operational concerns as traditional industrial activities and is a low-impact, privacy focused accommodation and wellness business. New rules aimed at industrial operations could unintentionally impose constraints on their business. For example, stricter noise limit compliance requirements could add unnecessary costs, changes to permitted activities may make future expansion more difficult, requiring additional consents or approvals and traffic and access rules could impact how guests and service providers enter the site. Ensuring that accommodation and wellness businesses are recognized as appropriate uses in industrial/residential transition areas would provide clarity and allow for responsible, well-managed growth. PC20 should consider allowing low-impact commercial accommodation as a recognized activity within industrial zones near residential areas. The Industrial General zoning does not reflect the nature of businesses like Motel X, which operate more similarly to mixed-use or hospitality businesses rather than industrial operations. A <u>company that leases warehousing and ancillary retail</u> and a <u>warehousing, online sales and ancillary retail business</u> considers the interface between commercial and industrial particularly in Sydenham is artificial and there is no reason to exclude commercial or retail operations from this area. The <u>company that leases warehousing and ancillary retail</u> considers further restriction of ancillary commercial activities is overly onerous and unduly restricts use of property in the Industrial Zones. In many cases the interface is with a commercial zone, for example streets on Sydenham that bound Colombo Street, and the industrial/commercial interface makes no sense. The <u>warehousing, online sales and ancillary retail business</u> comments in their case the interface is with a commercial zone and the City Centre. The Industrial Zoning of streets in Sydenham does not accurately reflect the range of businesses operating in the area and looking forward will prevent appropriate servicing for the hoped for more dense mixed use residential zone nearby.
Double layer of noise control unfair	<u>Ravensdown fertiliser manufacturer</u> consider the draft will effectively place a double layer of noise control on industrial activities in industrial zones, with the extent of this noise control or management not applying to any other activities in any other zones in the City. This approach is not a fair or balanced resource management approach.
Need to recognise s16 noise requirements	<u>Ravensdown fertiliser manufacturer</u> consider the proposed new regulatory approach does not seem to consider the requirement of section 16 of the RMA for activities to avoid unreasonable noise.
Apply NZ 6802 everywhere in the city	A <u>waste company</u> considers, if it is noise the plan change is seeking to manage, then ensuring the use of NZS 6802 everywhere in the City can allow compliance with the noise rules in relation to the interface with residential zones, provided NZS 6802 covers the noise of concern. Compliance with noise rules can then allow a number of solutions, including altering the hours or types of machinery utilised operationally or building noise barriers or buildings to contain the noise within the site, rather than restrictions on location of the activities taking place near to the residential zone.

Improve noise mitigation in residential units	A <u>transport and logistics company</u> and a <u>national road freight association</u> considers better noise mitigation in residential developments can achieve improved outcomes at a lower cost, without the adverse implications to the economy. Two <u>metal recycling businesses</u> query where is the onus on developers to build more suitable housing when creating residential living spaces near existing industrial zones? And why the draft is proposed when the PC14 acoustic advice suggests there could be justification for requiring new intensified residential dwellings to provide some level of sound insulation or be set back?
Make the PC20 acoustic advice publicly available prior to notification	<u>NZ Association of Metal Recyclers</u> considers the Council could be more transparent and give the opportunity to review the PC20 acoustic advice in advance of any formal consultation process. It is likely to impact on the economic analysis needed for the Section 32 analysis and for members to make informed submissions.
Do not progress PC20 until final decisions PC14 are understood	<u>NZ Association of Metal Recyclers</u> comment that the ‘Industrial Interface Qualifying Matter’ (IIQM) applies to medium and high density residential zones (MRZ and HRZ) within 40m of industrial zones. It currently only applies in walkable catchments of commercial centres because Council has not decided on the wider zoning for Medium Density Residential Standards. Industrial zones have not changed in Christchurch, it is the residential zoning which has. If Council is going to make decisions about wider use of Medium Density Residential zones, it could be placing even more housing units, at greater intensity, closer to industrial zones. They cannot comment on the implications of decisions that have yet to be made; progressing Plan Change 20 should, at a minimum, be put on hold until Council’s final decisions on PC 14 are understood.
Rely on PC14 Industrial Interface Qualifying Matter	A <u>GIB manufacturing company</u> comments that the Council accepted the QM for the Industrial Interface where the MDRZ zoning is located adjoining an industrial zone. This is considered the most appropriate planning mechanism to manage reverse sensitivity effects at the boundary, because it focuses on placing restrictions on further residential intensification on the residential zone and not placing limitations on the existing industrial zones. The Council did not ‘upzone’ the residential area opposite the WWB from residential suburban to MDRZ. This further signals that the Council does not consider this area appropriate for residential intensification and acknowledges the requirement for the industrial activities within this area, to continue to operate as ‘business as usual’. The direction and management of reverse sensitivity matters in the draft plan change appears to be in direct contrast to what Plan Change 14: Housing and Business Choice has proposed. PC14 introduced a Qualifying Matter to the MDRS so as to manage residential development near established industrial areas, with the aim of balancing housing intensification with industrial activities and thus reduce the risk of reverse sensitivity issues arising.
Pre-notification consultation approach	Comments from respondents on the pre-notification consultation approach were as follows: - More specific info on their site or area would be good, rather than the whole city. - Guided questionnaire doesn't seem to give the option for a proper submission. - More specifics would help. - Give a better summary in plain English and relate it to an everyday scenario so that the majority of people don't have to trudge through endless information to try and figure out what's going on. - Have a town planner come and visit them to see and understand their specific situation. - CCC to have written or emailed owners of the properties. - Being given notice that this was happening. - Did not get any information from CCC that this was happening and would expect that they would have been contacted, rather than by chance being told this was being reviewed again. - Easy to access but is time consuming. - Letter from council in relation to only one of three industrial properties connected to. Joined the Let’s Talk and followed the project but did not get any notifications when questions about the project were answered. The survey initially appeared geared toward residents rather than owners and occupiers of industrial property. It would have been helpful to be able to preview the survey questions. - Council could not provide a fact sheet within a reasonable time frame, so how do they expect people to comment. - Some of the questions are not relevant, they all assume a particular interest in one piece of land.

	- If the Council had contacted them or landlord directly. Has not been widely notified. Only heard about this proposal because landlord received notice in relation to another property and passed on the information. - Being able to discuss the changes with staff prior to making a submission would have been preferable. Staff who'd suggested they would call back to discuss could've done so. Spoken to owners of several other businesses affected by this proposed change, and none of them were aware of this. For a change that will directly affect a large number of businesses across the city, it's less than ideal that these businesses weren't directly consulted first. Yet to understand why this specific change around ancillary retail is being suggested, and what it aspires to achieve. - As a landowner and operator within an established industrial zone, want to highlight that affected landowners were not (to their knowledge) consulted prior to the release of this draft. - If the Council had sent the promised communications and made the information available to interested parties. - Need full transparency in any zoning or planning changes. Must have full discussion from all parties and not leave this planning change to the whim of councillors who may have no understanding of the costs and benefits that most surely will arise. - It's fairly difficult to understand without being a planner. Not sure if it's possible to boil it down into plain English a little more for the layperson. It's great to have the option to upload documents. - A more information specific letter. - It would be good if gave comparison of what the rules are vs the proposed change. - It is good that there is space to make comments. - Why is this solely set up for residential based complainants - this shows bias against industrial landowners. - Survey had no decent questions in it. - Email to affected households via rates contact details. - At first all they could see was the section of the online form where were supposed to ask questions. Think the layout of the online form is confusing. - Maybe a small message printed on rates bill. - Probably won't be listened to ... don't know why ask for feedback as just do what you want anyway. Glad they a chance to let you know about something that plagues me EVERY DAY AND EVENING ... but don't hold out hope for any change or improvement.
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Feedback on specific provisions

Definitions	Container yards	A <u>waste company</u> does not support the proposed definition and seeks it is deleted. They consider it is not specific enough as to the size or amount of containers being defined by the rule and will result in unintended consequences in application. It would capture most import/export or waste management businesses, for example, that have outdoor storage due to the nature of their business. A business with a yard containing skip bins would be caught by the definition, equally a business selling garden storage containers. If the definition is meant to aid in a rule to encompass the issue of inland ports then the definition should either be restricted to shipping containers or deleted altogether and replaced with a definition for an inland port.
	Heavy industrial activity	A <u>GIB manufacturing company</u> does not support the amendments to fuel-burning metrics as it is an extremely restrictive and unfounded restriction which would unduly capture their operation. Reducing the net heat or electrical energy output to 40kW or more for a heavy Industrial activity result in a substantial increase in activities being captured by the definition of ‘heavy industrial activities’ given that 40kW of energy is equivalent to the output of two domestic wood burners and it does not align with the operative Canterbury Regional Air Plan 2017. They seek to retain the operative definition or use the definition contained in the Wellington City Plan as follows: ‘ <i>Heavy Industrial Activity</i> ’ ‘ <i>means an Industrial Activity that generates: offensive and objectionable noise, dust or odour, significant volumes of heavy vehicle movements, or elevated risks to people’s health and safety. Heavy Industrial Activities include quarries, abattoirs, refineries, the storage, transfer, treatment, or disposal of waste materials or significant volumes of hazardous substances, other waste management processes or composting of organic materials.</i> ’ As a Section 321 evaluation has not been provided they cannot ascertain the rationale, justification or the intended outcome sought. They recognise the NPS-GHG seeks to reduce greenhouse gas emissions by managing the discharge to air from the production of heat for industrial processes, and it is ECan who is responsible for implementing it. The NPS-GHG Policy 1(a) seeks to ‘avoiding discharges from new heat devices that burn coal and deliver heat at or above 300 °C, unless there is no technically feasible and financially viable lower emissions alternative;’. The quantum of heat that NPS-GHG

	seeks to manage, being 300 °C or above is well in excess of the draft provisions limiting heat output equivalent to around 45°C. They consider the 40kW output is the equivalent of a mobile air conditioner that provides for temperatures between - 2°C to 45°C and therefore is not aligned with the higher order documents at a national level. Their operation uses LPG burners in the gypsum processing and plaster manufacturing process and to dry the plasterboard. Consent for the air discharges in relation to these burners have been lodged with Environment Canterbury and draft conditions provided, which are being finalised. The operation is therefore aligned with Policy 1(e) and (f) of the NPS-GHG given that there is no burning of coal within their operation. In addition, the WWB operation aligns with the objectives and policies of the Canterbury Air Regional Plan. It is considered that the amended definition does not align with the overall objective of draft PC20, which is to reduce the reverse sensitivity effects and reducing the electrical/heat output is not listed as an adverse effect that the Council has received complaints on. Therefore, it is considered there is no justified rationale for the restricted quantum of output within the definition particularly in terms of the effects it seeks to manage. The outcome of the definition change will result in activities that were previously defined as ‘Industrial Activities’, which were a permitted activity, as now being defined as ‘Heavy Industrial Activities’ and would trigger a Restricted Discretionary consent where it is located within 200m of a residential zone under Rule 16.5.1.3. In addition, they do not support including metal recycling in the definition and consider it is unfair to label all metal recycling operations as “Heavy Industrial Activity” as this is a generalisation of the industry overall. There are many different levels of metal recycling, from operators with forklifts and trucks through to larger operators running a variety of baling and shredding plant. A <u>waste company</u> considers that while the list of industrial activities that propose to be considered as heavy industry activities appears adequate it will capture many essential industries to Christchurch and the South Island. Waste transfer stations and concrete batching plants, for example, are activities that are essential to the safe functioning and growth of a city. The resulting rules utilising the definition are critical to avoid unintended consequences on the establishment, operation and viability of these regional activities. <u>Waterloo Business Park</u> do not support the 10 additional activities being added to this definition and seeks they are deleted. Instead, effects of any activity should be based on the environmental effects of the activity at the boundary of the site. They consider it is disappointing that specific activities are listed as heavy industrial activities, rather than emphasising and controlling the effects of activities. The Draft Plan Change approach, therefore takes no account of the scale, intensity, or character, and does not differentiate between different proposed activities of the same nature. <u>Environment Canterbury</u> do not support fuel-burning rate and seeks it is amended as it should not align with that in the Canterbury Regional Air Plan. The units in the Air Regional Plan are appropriate to managing adverse effects on air quality. ECan’s Air Quality Science team advises that kWhr and kg/hr are not equivalent units, and the relationship between the two varies significantly depending on the fuel source used. One unit cannot be translated to the other without changing the scope of activities that are covered, with the scope change varying significantly between different fuel sources. <u>Selwyn District Council</u> seek that the spelling of hoofs should be amended to hooves. <u>The Waipuna Halswell Hornby Riccarton Community Board</u> supports proposed amendments to include more activities under this definition. The Board does not have a position on the change to the fuel-burning rate as it is unsure of the reasons for the change.
Height	<u>Waterloo Business Park</u> do not support the proposed amendment and consider the change, that the height can be measured at any point in a site, is excessive given the increase in the distance from the non-industrial boundary from 20 metres to 200 metres.
Machinery	A <u>construction and industrial property ownership firm</u>, a <u>demolition company</u> and an <u>industrial land owner</u> do not support the proposed amendments. They consider the definition is too broad would capture heat systems, ventilation systems, and refrigeration units. The definition is unnecessary given its purpose appears to be to provide definition for inserted Rules 16.4.2.10, 16.5.2.9, 16.6.2.9 which are considered inappropriate and should also be removed. A <u>GIB manufacturing company</u> does not support the proposed amendments and seek that it is deleted. They comment that a definition that captures any device that is used in an industrial activities that provides noise or vibration, without any qualifying level of what noise or vibration is considered ‘acceptable’ is an overly onerous and will result in unnecessary and unfounded consenting requirements for industrial activities which have not been justified in terms of the costs and benefits of a s32 analysis. The wording ‘that produce noise and/or vibration through their operations’ without any quantitative qualification on the level of noise and/or vibration that machinery produces, will result in Rule 16.4.2.10 being triggered by the use of any machinery, mechanical or electrical equipment, irrespective of the level of noise or vibration being captured within the

		consenting framework. They consider this is a perverse outcome and would also result in the operating hours of the Opawa site being limited to 0700-2200 even when machinery operates at a noise level that meets the general zone rules. A <u>waste company</u> seek that the noise rules should apply to machinery no matter which zone they are located in. Therefore, the definition needs to be amended to encompass machinery in all zones so that the noise rules apply equally. There should not be segregation of noise by activity except to define activities sensitive to noise. They seek the following amendment: ‘Means, in relation to Noise ~~Rules 16.4.2.10, Rule 16.5.2.9 and Rule 16.6.2.9~~; mechanical or electrical devices, equipment or systems used in industrial activities that produce noise and/or vibrations through their operations.’ <u>Ravensdown fertiliser manufacturer</u> does not support the proposed amendments. Given the role that this definition plays in Rules 16.4.2.5, 16.5.2.5 and 16.6.2.6, it is considered that this definition is both problematic and unnecessary. It is problematic as it applies to the full range of activities that may be present at an industrial site, including but not limited to, cooling units, air vents, refrigeration units etc. It is also unnecessary as there is a common understanding of what is meant by ‘machinery’. <u>Selwyn District Council</u> seek changes as definition is too narrow and inadvertently and/or unduly captures ancillary activities within the industrial zone, such as trade and industry training activities that might need to occur outside of usual business hours or ancillary retail activities, that may require machinery to operate.
Chapter 6.1 (noise)	6.1.2.1.1 Policy – Managing noise effects	A <u>construction and industrial property ownership firm</u>, a <u>demolition company</u> and an <u>industrial land owner</u> do not support the proposed amendments. They comment that applying the provisions of ‘special audible characteristics (SAC)’ would likely result in unintended consequences in terms of existing activities and their ability to demonstrate existing use rights / that noise activities were lawfully established. It is highly likely that the approach would provide a pathway for enforcement action for existing activities. The insertion of this requirement (and removal of the exception for Industrial Activities only in Rule 6.1.4.1(a) is considered an inequitable approach to managing noise effects within the City as a whole. <u>Ravensdown fertiliser manufacturer</u> does not support the proposed amendments. They comment that NZS 6802 contains provisions about how to assess special audible characteristics (i.e., bangs, clangs and thumps), but these provisions are not currently applied in Christchurch City as a result of the current ‘exemption’ included in Rule 6.1.4.1(a). The Draft PC20 seeks to change this exemption such that it only applies in residential zones where the noise is generated within industrial zones. Ravensdown opposes this approach as it does not reflect a fair or even playing field. Noise is generated throughout the City, not just from industrial zones, and therefore if the special audible characteristics exemption is to be removed from Rule 6.1.4.1(a), it is considered that it should be removed from the rule in its entirety (resulting in the assessment of special audible characteristics then being carried out in accordance with NZS 6802). A <u>construction and industrial property ownership firm</u>, a <u>demolition company</u>, an <u>industrial land owner</u>, and <u>Ravensdown fertiliser manufacturer</u> comment that rather than implement the proposed amendment Council can continue to rely on activities being required to comply with the CDP’s noise limits, or land use consents, and where limits / consent conditions are not complied with then Council have the ability to undertake enforcement action. Enforcement action can also be undertaken where it is determined unreasonable noise is being generated (as provided for by section 16 of the RMA). A <u>GIB manufacturing company</u> does not support the proposed amendments and seek they are deleted. They comment that there is no sound planning basis for these amendments, there has been no justification provided and acoustic expert assessment needs to be provided to be able to fully understand the nature and scale of change these changes will result in and so the impact on the ability to comply with this standard can be ascertained. The use of the ‘Special Audible Characteristics’ need to ensure that frequency and intensity are also taken into consideration and not just the presence. Overall, it appears that the intent of both the amended Noise Policy 6.1.2.1.1 and corresponding Rule 6.1.4.1 is to reduce the permitted noise levels of the Industrial Zoned areas in favour of the residential zones and therefore reduces the ability to provide for the zone’s long-standing and intended use. A <u>waste company</u> does not support the proposed amendments and seek they are deleted. They comment that it is not required if the assessment of noise is undertaken in accordance with NZS 6802, as per Section 6.1.4.1. However, the provisions of NZS 6802 cannot be ascertained without paying \$155 for a copy. Therefore, the Council should outline which characteristics are of concern so that the policy can acknowledge the specific issues. Presently, there is no rational for the proposed change and the scope of the characteristics of concern is also unknown. It could potentially cover any night-time activities that are necessary in an industrial zone. If any of these characteristics are of concern, they should apply equally across the city in all zones and all circumstances. It might be assumed that similar issues would arise in the central commercial area or
	Rule 6.1.4.1 Measurement and assessment of noise	

		during construction. The changes to the rule appear to ‘pick on’ industrial sites when the noise (of unknown concern) may arise from consented activities in other zones. Ensuring the right noise limits are in place at the interface of the industrial and residential zone rather restriction on trade will allow compliance though a variety of means. <u>Lyttelton Port Company</u> does not support the proposed amendments. They comment that the proposed inclusion of “special character noise” (e.g., bangs, clangs, and thumps) raises concerns regarding enforcement, subjectivity, and operational feasibility. Many industrial activities produce such noises, even when operating within permitted noise limits. There needs to be greater clarity on how "special character" noise will be assessed to ensure a fair and practicable approach. Consideration should be given to alternative mitigation measures, such as site-specific noise management plans, rather than imposing restrictions which may curtail established and legitimate industrial activity. A <u>self storage business/proposed hotel business</u> does not support the proposed amendments and comment that stricter noise limits are already addressed in their design, but additional compliance costs could arise. They encourage allowing flexibility in noise and operational standards for non-industrial businesses that do not generate significant disruptions. <u>Kāinga Ora</u> supports the proposed amendments particularly the introduction of special character sound considerations, which better reflects the lived experience of residents and will support improved sleep and wellbeing outcomes in affected homes. <u>The Addington Neighbourhood Association</u> seeks that the noise rules should apply equally to houses and businesses. One <u>resident</u> seeks that special audible characteristics apply at all hours as the noise described impacts on residents' enjoyment of their homes and wellbeing at all hours. One <u>resident</u> seeks that industries should still be restricted in noise (or other nuisance) levels, regardless of length of their tenure and that the rules should be clearly available for businesses and residents. One <u>resident</u> seeks that consideration is given to noise nuisance from persistent alarms going off between 9 p.m. - 8 a.m. in any industrial area within 1km of a residential area. <u>The Waipuna Halswell Hornby Riccarton Community Board</u> supports proposed amendments, however, seeks that it is also applied to changes to existing industry such as where significant new and noisier equipment is installed.
Industrial objectives and policies	16.2.1.3 Policy - Range of industrial zones	A <u>waste company</u> supports the policy amendment as it recognises that the light Industry zones in Christchurch are not always surrounding a Heavy Industry zone. <u>Ravensdown fertiliser manufacturer</u> supports the policy amendment as it recognises that a zoning buffer does not always exist between IHZ and residential zones (i.e., as is the case with Ravensdown’s Christchurch Works).
	16.4.3 Objective - Effects of industrial activities	A <u>construction and industrial property ownership firm</u>, a <u>demolition company</u> and an <u>industrial land owner</u> do not support the objective amendments. They consider the amendments seek to inappropriately prioritise residential amenity over the purpose and role of Industrial activities as considered at the residential interface. This approach would institutionalise reverse sensitivity effects on established Industrial zones in a manner that does not given effect to the CRPS (Objective 6.2.6 and Policy 6.3.6(6)(i)) and would not be the more appropriate in terms of supporting and strengthening existing industrial areas (DP Objectives 3.3.5, 3.3.10 and 16.2.1). The specific amendments / insertions (clause (b) and (c)) relating to improved amenity and increased tree canopy respectively are opposed as being unjustified, not linked to the purpose and outcomes of the zone(s), subjective as to the outcomes expressed and creating uncertainty for transaction costs associated with eventual resource consents. Specifically in relation to tree canopy (clause (c)), the addition is an inappropriate mechanism to achieve a wider perceived public good. The <u>construction and industrial property ownership firm</u> and the <u>demolition company</u> also comment that the operative statutory framework recognises and provides for Business zones (and their economic benefits) and the commensurate trade off in terms of a loss of character and amenity of the locality. The amendments reverse this presumption to require an amenity that is consistent with adjoining residential development. The amendments do not achieve and implement the higher order statutory framework. A <u>GIB manufacturing company</u> does not support the objective amendments. They consider the changes are a substantial departure from overall intent of the zone and do not provide support for industrial activities and will give rise to further reverse sensitivity limitations on existing lawfully activities within the zone.

	A <u>waste company</u> comments that the former wording under (a) recognised the unique issues of adjoining amenity to an industrial zone, and if removed from the objective, it should still be worded in the policy. The <u>GIB manufacturing company</u> and the <u>waste company</u> comment that the objective number appears to be an error and should be 16.2.3. <u>Ravensdown fertiliser manufacturer</u> does not support the objective amendments. They consider the changes directly seek to support the proposed changes to the amended regulatory framework for industrial activities in industrial zones, thus supporting the institutionalisation of reverse sensitivity effects. The proposed amendment to Objective 16.4.3(a) and Policy 16.4.3.2(b) removes the recognition that sites adjoining industrial zones will not have the same level of amenity, and then in effect places additional constraints on industrial activities that are appropriately located in industrial zones. This is evident in PC20's proposed regulatory framework which places restrictions on industrial activities as a whole (i.e., by not permitting heavy industrial activities in the IHZ within the 200m industrial / residential interface and by restricting the use of heavy vehicles and machinery at night-time). This approach means that industrial activities are not being appropriately provided for in the zone (which could be considered contrary to operative Strategic Objectives 3.3.5 and 3.3.10 (3.3.11) and Objective 16.2.1(a)). <u>Selwyn District Council</u> seeks that the objectives that apply to the industrial zone need to sit comfortably together and provide sufficient protection for industrial activities as inadequate protection of industrial activities may result in a decrease in demand for industrial land within the CCC jurisdiction that Council should be aware of. Also seeks changes to draft objective where referring to interface and improved amenity, and to include a precinct map layer. Improvement of amenity is subjective and not something specific that could be measured. Improving amenity may create issues where the existing receiving environment is reasonably good and requirement for further improvement may be unreasonable (could change to enhanced amenity). Lack of specificity about what is to be improved and over what timeframe. Applying at the interface is not specific and could be identified within a precinct.
16.4.3.2 Policy – Managing effects on the environment	A <u>construction and industrial property ownership firm</u>, a <u>demolition company</u> and an <u>industrial land owner</u> do not support the policy amendments. They consider the insertion of the effects hierarchy, with a directive 'avoidance' policy for significant effects has no foundation in the higher order planning framework and is unnecessarily restrictive. Provisions seeking to 'improve residential amenity' is opposed, institutionalising reverse sensitivity effects on the established industrial zoning framework in the City, imposing additional regulatory costs on the established industrial zone, and creating subjective and increased transaction costs as associated with the uncertain term 'improve' through the resource consent process. A <u>GIB manufacturing company</u> does not support the policy amendments. The policy direction is a significant change to 'improving' residential amenity rather than acknowledging that there is a lower level of amenity anticipated where residential development adjoins an industrial zone. Clause b(iii) creates a policy that is contrary to the overall zone intent and introduction wording. An industrial zone activity does not have to ability improve the residential amenity and therefore this policy cannot deliver the outcome the Council is seeking, it is not able to be given effect to. Seeks that either clause 'b' is retained as per the operative wording or if the Council wishes to further strengthen the ability to manage adverse effects, clauses i. and ii. are sufficient that clause iii should be deleted from the draft wording. The s32 Report for the Operative Policy, which assessed a similar Policy option (Option 4) to the draft Policy 16.4.3.2 (b) and was considered the "conservative approach of requiring a higher standard of amenity in industrial areas" would "limit locational opportunities for industrial businesses that seek a lower amenity environment as a result of the effects they generate, or that may cause some existing businesses to relocate to other areas, diminishing the returns from investment in the area including infrastructure and other improvements, e.g. streetscape" and concludes that this option "does not place sufficient emphasis on the needs of industry and could result in the inefficient use of resources and infrastructure." and this policy option was therefore rejected. It is considered that the s32 assessment of Option 4 policy is still a valid conclusion to the Draft Policy. The <u>GIB manufacturing company</u> also comments that the policy reference should be Policy 16.2.3.2. A <u>waste company</u> does not support the policy amendments. The policy should reflect the prior wording as well to recognise that where residential zones abut an industrial zone and particularly a heavy industrial zone, their level of amenity may be lower than further from the industrial zone. Without this wording, the activities in the industrial zone will be unduly restricted, when there is no other zone for these activities. Industrial space in Christchurch is well utilised and those industries needing a heavy industry zone are limited in their location without further controls limiting their ability to establish. The interpretation and application of 'adjoining a residential zone' is problematic. Does this mean those individual properties that share a boundary with an industrial zone or those residential properties across the road, or just where the different zones intersect on the map. The interpretation will make a difference in being able to undertake certain activities closer to a residential zone. If the interpretation extends to 200m from the industrial zone as

		implied by the container yard rule this severely impacts on the ability of certain industrial businesses to operate. The 200m is too extensive and will cover a significant portion of existing industrial zones. They seek that clause 'b' read: Effects of industrial activities are managed in a way that the level of residential amenity (including health, safety, and privacy of residents) adjoining an industrial zone is not adversely affected while recognising that it may be of a lower level than other residential areas, and also in a way that: ii. appropriately mitigates adverse effects; and iii. improves residential amenity as the industrial zone is redeveloped or activities change. A <u>trade supplier and yard business</u> comments that the policy support for the planting rules is considered to be excessive. The policy has two components that are ran together, so it doesn't make complete sense. The first part requires industrial zones to incorporate appropriate planting to contribute to the city's overall tree canopy. While tree planting is generally supported the amount of tree planting, as applied to this site in respect to the accompanying rule, and the policy requirement to contribute to the city's overall tree canopy, appears out of context for an industrial zone. There are many places in the City that can more easily and appropriately contribute to the city's tree canopy. If the focus is on the residential interface, then it is not the contribution to the city's tree canopy that should be the focus of the policy, but rather the residential interface itself. The second part 'in locations that avoid conflict with activities on site' should be a separate clause. If it is understood correctly this part of the policy is attempting to bring in situations and/or provide for situations where it may not be appropriate to plant trees due to the operational and safety needs of the industrial activity, but as it stand s it looks tacked on as an afterthought. The amendment to Policy 16.4.3.2 to include b iii, is also a concern. This policy would actually require an 'improvement' in residential amenity as the industrial zone is developed or activities change, which is excessive and could create an unreasonable burden or high bar for the owner/operator of an industrial activity. It may not be possible or practicable for residential amenity to be 'improved' depending on opportunities in the specific location. It is also ambiguous and lacks clarity in terms of what will be required or pass muster as an 'improvement' and could make resource consenting difficult/subjective.
Industrial activity status tables	Ancillary retail activity	A <u>demolition company</u> and a <u>construction and industrial property ownership firm</u> do not support proposed amendment as the operative provisions are considered to be workable and provide for the merits of applications to be considered as subject to the requirements of s104 of the RMA. An <u>individual with interests</u> in the IG zone queries what is the reasoning for this amended rule allowing only products produced or processed on site and not stored goods. A <u>waste company</u> supports proposed amendment as it will ensure that retail in the industrial zones does not become the predominant activity as could happen when goods stored on site allow for general or wholesale retail. A <u>warehousing, online sales and ancillary retail business</u> does not support proposed amendment as their current businesses in Sydenham would have to move if they were not allowed ancillary retail of products which were not produced on site. The changes seem completely unrelated to the problem the amendment is purporting to address and has not been widely notified. A <u>warehousing and distribution business</u> does not support proposed amendment. They operate a wholesale operation in a general industrial zone, where most of the space is taken up by goods that are stored on the site before being dispatched to customers. A portion of the business premises is showroom, available for some wholesale customers to visit the site to purchase directly from goods on show. If they were to reestablish business operations at another site in an industrial general zone it would no longer be permitted and a non-complying consent would be required or they would have to amend business practice. They only 'process' a certain amount of materials on site, and most is stored for wholesale to qualified customers only. They will change locations in the next 3-5years to a more affordable premises at other industrial general sites. If this was to become a non-complying activity status, decision maker has a wide remit of considerations including setbacks, parking, landscaping, and a range of other introductions into the industrial chapter as per plan change 20. This will result in a large number of potential areas becoming untenable to operate in. Most industrial general buildings are located in industrial business parks, or complexes subject to body corporate ownership regimes and any potential changes to the exterior appearance, access or operation of the business park as a whole is outside the remit of a business tenanting a building. If such matters were subject to assessment in a resource consent - this could create difficulties and restrictions in where businesses could locate if they were now required to get a consent for ancillary retail activities. The <u>warehousing, online sales and ancillary retail business</u> and the <u>warehousing and distribution business</u> both comment that it is overly onerous and unduly restricts use of property in the industrial zones. New Zealand as a whole imports and distributes products from warehouses in the industrial zone rather than manufacturing on site.

		A <u>company that leases warehousing and ancillary retail</u> does not support proposed amendment. They have one site that is currently unleased and the restrictions on ancillary retail will limit the tenants they can consider for the site reducing potential income. It also limits options for changing uses of currently leased sites. A <u>warehousing business</u> does not support proposed amendment. They see no reason to exclude commercial or retail operations from the General Industrial Zone where commercial zones are in close proximity. In the industrial zone of their building the primary purpose is warehousing for the most part is distribution of products not manufacturing on site. The proposed amendment would impose too onerous a restriction on use of property in an Industrial Zone. <u>Waterloo Business Park</u> does not support proposed amendment as it is a departure from the existing provisions and bear no relationship whatsoever to the concerns and complaints received regarding metal recycling yards and container yards. An <u>industrial property developer</u> does not support proposed amendment as it is an unnecessary constraint that would not appear to achieve any particular amenity change, especially as ancillary retail is heavily restricted already. A <u>distillery business</u> does not support proposed amendment as excluding sale of products not produced or processed on site will reduce their ability to make revenue from retail customers and tour groups by restricting their ability to sell branded merchandise alongside consumer products. This rule change does not seem to have anything to do with managing impacts on neighbouring residential areas so shouldn't be included. If it does then it should be limited to those businesses that are actually neighbouring residential areas. The Waipuna Halswell Hornby Riccarton Community Board does not support proposed amendment as it considers it is too restrictive.
	Container yards within 200m of residential zone boundary	An <u>individual with interests</u> in the IG zone does not support proposed rule as it seems excessive and comments that container yards are different types of activity and should be dealt with separately. A <u>waste company</u> does not support proposed rule as the 200m would cover 1 to 2 blocks of industrial land in many locations and appears to be an extremely large buffer for the amenity effects the rule is supposedly trying to manage. They seek it should be reduced to a distance that better reflects the needs of the industrial zone and mapped as an overlay where relevant rather than relying on having to work it out on the maps given the issue of interpretation of the exact location of a residential zone boundary. <u>Waterloo Business Park</u> does not support proposed rule and seeks it is deleted as it involves a significant increase in the restrictions. A <u>trade supplier and yard business</u> comments that a change of activity to include container yards would need resource consent anywhere on their site as the whole site is less than 200m long. One <u>resident</u> supports the requirement for container yards, however, seeks that they are a greater distance as 200m is still too close for a lot of noise effects to be felt, and the restricted discretionary activity status is too enabling. The Waipuna Halswell Hornby Riccarton Community Board supports proposed rule, however, seeks that the activity status is discretionary rather than restricted discretionary to afford residents' greater protection from any effects on amenity.
	Heavy industrial activity shall be located at least 200m from any residential zone boundary	A <u>demolition company</u> does not support proposed rule as it risks creating reverse sensitivity constraints on established heavy industrial areas. An <u>individual with interests</u> in the IG zone does not support proposed rule as its scope seems disproportionate to the issues it sets out to deal with and seems excessive. These are different types of activity and should be dealt with separately. They comment that recycling is an environmentally good activity. To cause tenants to have to restrict their activities at their present locations will result in disruption that is likely to result in them having to relocate. Relocation is a costly undertaking and may result in some businesses ceasing to operate and are a cost to the local economy. A <u>GIB manufacturing company</u> does not support proposed rule which would cover almost the entirety of their site. They consider it is misaligned with the intent of the zone and seek that it is deleted.

	A <u>waste company</u> does not support proposed rule, seeks that it is deleted and considers it negates the purpose of the zone which is the only location for heavy industrial activities. It is overly onerous and effectively restricts the area of the Heavy Industry zone by a significant margin. They request the % of the zone affected by this rule is assessed and published and how it affects specific heavy industrial areas. Most of these activities still require regional consents for odour and/or other discharges, thereby controlling most effects. If the Council furthers this rule, it should be mapped to specific properties on the planning maps to avoid confusion of interpretation of where the rule applies. They note a potential referencing error where 16.5.1.3 Restricted discretionary activities RD3 P1 refers to buildings and therefore it is queried whether the reference to P1 is a mistake and should be P3. <u>Ravensdown fertiliser manufacturer</u> does not support proposed rule and comments that the CDP has established areas of IHZ land to provide for the effective and efficient development and operation of heavy industrial activities. This rule is not consistent with the intent or purpose of the zone. The 200m buffer has the potential to affect large areas of IHZ land as evident at Ravensdown’s Christchurch Works (i.e., it would cover the majority of the 12.151ha site). <u>Lyttelton Port Company</u> does not support proposed rule which could potentially limit future development in the southern and eastern areas of CityDepot and have unintended consequences, requiring new consents for modifications that do not necessarily impact the surrounding residential environment. <u>Waterloo Business Park</u> does not support proposed rule as the control of the activities within a distance of a nonindustrial boundary should be based on their environmental effects rather than a “blanket” outdated Town & Country Planning Act approach taken in the Draft Plan Change. One <u>resident</u> supports the definition of heavy industrial activities, however, seeks that they are a greater distance as 200m is still too close for a lot of noise effects to be felt, and the restricted discretionary activity status is too enabling. <u>Environment Canterbury</u> support in part proposed rule as aligns with CRPS direction (CRPS Policy and Method 14.3.5), however, seek a 500m setback for heavy industrial activities associated with discharges to air to help land use and air discharge consenting processes to be better aligned, and to ensure all potential or perceived significant reverse sensitivity effects to be addressed. <u>Selwyn District Council</u> seek that the 200m interface buffer zone may be better addressed through applying a precinct, in accordance with the National Planning Standards (NPS), noting that where heavy industrial activities can be located in a compliant location on a site and other associated activities will still occur. <u>The Waipuna Halswell Hornby Riccarton Community Board</u> supports proposed rule, however seeks that the activity status is discretionary rather than restricted discretionary to afford residents’ greater protection from any effects on amenity.
Residential, health care facility, education activity and guest accommodation	A <u>demolition company</u> does not support proposed rule within the Industrial General zone as the operative provisions are workable and provide for the merits of applications to be considered as subject to the requirements of s104 of the RMA. A <u>waste company</u> supports proposed rule as it will protect the General Industrial zones from reverse sensitivity. It will limit owner/occupier industrial units which have been monitored in certain locations for a number of years and over time become exclusively residential units or used for home business commercial service activities that also cause reverse sensitivity effects. <u>Lyttelton Port Company</u> supports proposed rule as it is considered to be an effective measure that will help prevent adverse reverse sensitivity effects in the future. <u>Waterloo Business Park</u> do not support proposed rule and considers the status of these activities within an industrial zone is excessive and that the present restrictions should be retained. <u>Kāinga Ora</u> does not support proposed rule as it would directly impact their owned sites in Woolston, particularly in areas such as Marshall Street and Radley Street, where homes were lawfully established in the 1940s but are now zoned Industrial General. They seek an alternative approach is adopted which recognises existing use rights and provides the ability for repairs, maintenance, replacement and extension to homes without the need to comply with the Industrial General Zone standards, or that the Plan Change include rezoning, especially for older industrial areas which are predominantly residential in character despite their current zoning.

		One <u>resident</u> does not support proposed rule as it would put far greater restrictions on their property and their residential neighbouring properties, including making it more difficult to get an extension to their house consented. They are also concerned that their residential neighbours would be redeveloped to industrial activities which will have a worse effect being next door than if the activity was over the back fence. The <u>Waipuna Halswell Hornby Riccarton Community Board</u> supports proposed rule. A <u>trade supplier and yard business</u> comments that a change for their site from discretionary to non-complying activity status for residential activities, health care facilities, guest accommodation and education activities seems counterintuitive since the site is surrounded by Residential Suburban Zone on all sides but one part boundary. For this site it is proposed that retaining a discretionary activity status is more appropriate. If this site is being protected for industrial activities on one hand through this rule (and policy framework) but being limited in its use for industrial due to being completely surrounded by residential zoning, that would appear to disadvantage this smaller industrial site.
	Transpower and Orion limited notification clauses	N/A
Industrial rules	Maximum height for buildings	A <u>GIB manufacturing company</u> does not support the amended rule as it is considered overly onerous without due justification and the operative rule sufficiently manages the effect of height, including shading and dominance, when coupled with other boundary setback standards and recession plane requirements. They seek it is deleted. It would reduce the maximum height over the majority of the Opawa Road site, which is within 200m of a residential zone to 20m and triggering a consent when it is unnecessary given the large separation distance between the nearest residential property. The existing operation contains two chimney stacks that are over 30 metres in height, which were established as a permitted activity. However, if the site was to be redeveloped further and an additional chimney stack of the same nature proposed, it would trigger consent under the proposal. They are uncertain how any residential building or structure 200m away from the industrial zone would experience adverse shading effects. A <u>waste company</u> does not support amended rule as it is considered onerous and does not have sufficient reason to be progressed and will set a precedent when considering breaches of other standards. They seek it is deleted. While it is rare that industrial buildings go over 20m in height in general, they query why is this rule with a 200m residential zone setback required when other standards would achieve the same if not better effect. The recession planes along the boundary with residential zones achieves a better outcome, and/or if there was a bigger landscape buffer from a shared boundary with a residential zone, for example 5m, this would also improve any amenity effects. A 200m height setback is considered onerous. Is it the design of any taller buildings that are the issue or height of stacked containers? These can be managed under other standards/by other means. <u>Ravensdown fertiliser manufacturer</u> considers that the 20m permitted height limit that would apply to their site has the potential to place an additional regulatory burden on any development activities that may take place in the future. In addition, the phrasing could be improved to provide more clarity about where and how the rule applies, such as ‘The maximum height of any building located between 20m and 200m from the boundary of a residential zone...’. <u>Lyttelton Port Company</u> does not support proposed amendment and considers there is the potential to reduce the available land for operations and site functionality and limit design options and usable land area. In the future, this may limit the scale and scope of any expansions of CityDepot. An <u>industrial property developer</u> does not support the proposed amendment and considers the proposed height limit for buildings within 20m and 200m of residential zones is too restrictive. The <u>Waipuna Halswell Hornby Riccarton Community Board</u> supports proposed amendments.
	Minimum building setbacks from road boundaries	<u>KiwiRail</u> does not support the removal of the KiwiRail limited notification clauses for breaches to the 4m rail setback and seeks to retain the current limited notification clauses and the 4m rail corridor setbacks. They seek that the provision wording is amended to read as follows: Any application arising from clause v. of this rule shall not be publicly notified and shall be limited notified only to KiwiRail (absent its written approval). They wish to prevent undesirable outcomes, such as where a residential apartment building was approved and constructed next to a rail designation without consultation with KiwiRail, and continue to be notified of setback breach applications where written approval hasn’t been provided. While noting s77D RMA, the above wording provides the opportunity for KiwiRail to assess breaches on a case-by-case basis and provide written approval

	where appropriate and similar wording is used in district plans throughout the country. This notification step is crucial for KiwiRail to assess applications and determine whether a building/structure within 4m of the rail corridor will have an impact on the safe and efficient operation of trains and rail operations within the corridor, and ensure appropriate amenity for neighbouring development. KiwiRail has experienced situations where planning officers have not understood rail operations and the designation status of the rail corridor and have failed to identify KiwiRail as an affected party to consents for works adjacent to rail land. In some cases, KiwiRail has experienced planning officers incorrectly classify the rail corridor as ‘vacant land’ or ‘open space’ and concluding on that basis, that there is no effect on KiwiRail or its operations by an infringement of a planning provision. This is problematic when developments rely on outlook to/daylight from a neighbouring rail corridor, or space within that corridor to maintain their building which can be developed/built-up with rail buildings/structures in accordance with the rail designation. <u>Waterloo Business Park</u> does not support the amended rule and seeks that the building setbacks from road boundaries should be retained as they are at present. The <u>Waipuna Halswell Hornby Riccarton Community Board</u> seeks that where industrial sites are over the road from other industrial sites that there be a setback to achieve an open corridor appearance. One <u>resident</u> does not support the draft 0m setback to industrial areas facing other industrial areas given that it does not consider neighbouring or nearby residential properties and is likely to result in extremely poor visual amenity. They seek that it is amended to a 2m setback or that a 3m setback applies within 200m of residential zones.
Outdoor storage of materials	A <u>construction and industrial property ownership firm</u> support the amended rule and state they do not oppose proposed restrictions associated with height on outdoor storage at a residential interface and targeted improvements in the clarity of several provisions. CSDL considers that PC20 should be limited to focus on these matters only. An <u>industrial land owner</u> supports amended rule, stating the restrictions associated with height restriction on outdoor storage would be supported. A <u>waste company</u> does not support amended rule and seeks it is deleted. Rules i. and iii conflict and the same outcome would be achieved with the amendment proposed, however the rules should be deleted. Rule (b) conflicts with 16.4.2.3 as you have two rules to comply with within 5m of a residential zone and this should be under one rule (only if proceeding) in order to graduate from 1.8m then 3m in height within 5m, then 8m. The result as written will be confusing and unclear to most readers. However overall, outdoor storage is usually fluid on an industrial site and having a height rule such as this will cause an enforcement burden for Council and be difficult to manage for many sites, not least having to judge the height of storage x m from a boundary. The rule may require 4 setbacks to be managed on a site, which will be very difficult, if not impossible. The outdoor storage can be adequately managed by screening and/or increasing landscaping to improve visual amenity and the rule should be deleted. The visual amenity of outdoor storage up to 20m from a residential zone as proposed under the rule is considered overly controlling where the main purpose of the zone is to provide for industrial activities, and their functional needs. Also, the rule does not account for where buildings screen the storage already. The rule implies that the ‘look’ of outdoor storage is a concern, however visual amenity is expected to be lower in industrial zones. The increase in landscaping requirements adjacent to residential zones also negate the need for the rule. Elsewhere in the country this is generally controlled by screening on the boundary. <u>Lyttelton Port Company</u> does not support amended rule and considers there is the potential to reduce the available land for operations and site functionality and limit design options and usable land area. In the future, this may limit the scale and scope of any expansions of CityDepot. <u>Waterloo Business Park</u> does not support amended rule and considers it unnecessary given the existing controls. <u>Two metal recycling businesses</u> do not support amended rule. They comment that metal recycling requires the stockpiling of materials for processing. The volumes received in by their sites daily are significant, and materials must be sorted and checked (e.g., for hazards) before processing can commence. Processing makes way for new materials and this cycle continues endlessly. The proposal that stockpiled material should not be kept longer for 12 weeks is a concern as unsure how this should be interpreted. Additionally, some of the materials collected and processed for recycling are low volume supply and need to be stockpiled for longer than 12 weeks to have the quantity necessary for export. For example, one of the metals grades produced in shredding operations takes an average of 4-5 months to produce the necessary export volume. They are affected by external factors outside of their control that require them to stockpile for long periods. Following the 2020 pandemic, the availability of dangerous goods containers was nil. This collapsed the lead acid battery market in New Zealand as batteries had no way of being exported. This meant that metal recyclers and all related businesses (e.g., car service centres) had to stockpile used lead acid batteries for over 12 months before things began to ease. Had metal recycling operators not been able to stockpile these batteries and

	continue accepting them for recycling, many of them would have ended up illegally disposed of along roadside and riverbeds. The proposed time limits on stockpiles, coupled with the many ‘set back’ requirements appear to be directed at removing stockpiles from view and ‘hiding’ messy industries such as metal recyclers from communities. This fails to acknowledge the contribution industries make to communities and fails to support the growth of them. Another <u>metal recycling business</u> does not support amended rule and considers restrictions on stockpiles not being kept longer than 12 weeks will restrict their business as they sell bulk materials which may need to be stockpiled for longer as can be impacted by overseas demand for the product plus shipping schedules. <u>NZ Association of Metal Recyclers</u> questions how stockpiled material kept for no longer than 12 weeks would be interpreted. This industry regularly stockpiles and then processes metals, making room for new material. While laypeople might consider that a pile has been in place for longer than 12 weeks, the reality is that the material will be new. In metal recycling, stockpiles are a necessary feature. If the intention of PC 20 is for metal recycling sites to remove all stockpiles from view, this industry will need to be shut down resulting in loss of recycling capacity, destruction of viable businesses, and loss of jobs. A <u>vehicle dismantling company</u> considers container movement and/or storage should be flexible for that stock. <u>Selwyn District Council</u> seek management of outdoor storage of materials where visible from main arterial roads such as through screening or fence permeability requirements given that overall amenity of an industrial zone is also apparent from key transport connections, especially where the rear of industrial sites back on to that transport connection. The <u>Waipuna Halswell Hornby Riccarton Community Board</u> supports proposed amendments. <u>Fire and Emergency New Zealand</u> seeks that the following clause is included in the proposed rule: ‘This rule shall not apply to emergency service facilities’.
Landscaping	A <u>construction and industrial property ownership firm</u> do not support the amended rule. The requirement to plant trees for every 500m2 of a site is considerably more onerous than the landscaping requirements for commercial zones where a higher level of amenity and public integration is anticipated and the approach to landscaping is inconsistent with the purpose and expressed outcomes of the Industrial zones. The requirement appears to be ideologically driven, does not have a foundation in the higher order statutory documents, and is an inappropriate mechanism not tangibly linked with avoiding or mitigating an adverse effect generated from Industrial activities in the district. The requirement would result in a substantial reduction in functionally usable site development. The requirement will result in substantial economic costs borne by Industrial land developers that is not linked to industrial (re)development. Whilst there may be wider community benefits associated with amenity improvements, carbon sequester and ecological diversity the costs will fall on the Christchurch Industrial market and are not linked to an adverse effect generated by (re)development of the Industrial premises. The provision of a landscape strip along the internal boundary with a residential zone, along the road frontage where opposite a residential zone, or specified road frontages (as was contained in the Operative Plan provisions) is considered reasonable and appropriate providing necessary landscape amenity in areas with greater sensitivities to the effects of Industrial operations. Amendments to increase clarity as associated with the Operative Plan requirements are supported. However, the requirement for the provision of a planted landscaping strip of 2m for all other road boundaries (including arterial roads at 3m) will have functional and operational costs to site development that are not commensurate with the Industrial zone outcomes and amenity anticipated within a ‘working’ environment of the City. The proposed requirement for tree planting and a 2m landscape strip on road boundaries within an Industrial zone will result in inequitable costs on Industrial land development that are not attributable to mitigating an adverse effect (passing traffic is inherently associated with the activities undertaken in the Industrial zone), nor is there an amenity need to provide a landscaped buffer between the frontage of adjoining Industrial sites. An <u>industrial land owner</u> and a <u>demolition company</u> do not support the amended rule. The approach to landscaping is inconsistent with the purpose and expressed outcomes of the Industrial zones. The requirement to plant trees in parking areas and for every 500m2 of a site and the requirements for landscaping strips is considerably more onerous than the landscaping requirements for commercial zones and even residential zones where a higher level of amenity and public integration is anticipated. The requirement appears to be ideologically driven, does not have a foundation in the higher order statutory documents, and is an inappropriate mechanism not tangibly linked with avoiding or mitigating an adverse effect generated from Industrial activities in the district. The <u>demolition company</u> also considers the requirement will result in substantial economic costs borne by Industrial land developers that is not linked to industrial (re)development. Whilst there may be wider community benefits associated with amenity improvements,

	carbon sequester and ecological diversity the costs will fall on the Christchurch Industrial market and are not linked to an adverse effect generated by (re)development of the Industrial premises. A <u>GIB manufacturing company</u> does not support the amended rule. They seek deletion of the 1 tree per 500m2 requirement as it is overly onerous, is not functionally practical and therefore is contrary to Policy 16.4.3.2. It would result a substantial requirement of trees on sites that, for the majority of Industrial sites, are well in excess of 500m². For example, their site covers an area over 4.6ha, would result in a requirement of 92 trees if the site was redeveloped. The practicality of providing for 92 ‘medium trees’ on an industrial site is both impractical and also inefficient in terms of land use. Given there is also no maximum site coverage provision, the practicality of this standard is not workable. In terms of s32 justification, the economic cost of this provision and the resultant reduction of productive industrial land is neither an effective or efficient planning mechanism to manage the intended effect this rule seeks to achieve. A <u>waste company</u> does not support the amended rule however consider the proposed changes are acceptable in the context of the Industrial Park zone. They consider the use of the word opposite a residential zone is confusing for interpretation where there is a river with a road next to it, with residential on one side of the river and industrial on the other. This occurs in the Woolston area. The proposed amendment clarifies that this rule would not apply in this circumstance. The parking area requirements is confusing as to whether it applies to all parking areas within the site or only where the parking area itself is next to the residential zone. If the former this is an onerous requirement for whole site particularly where the site is utilised for a transport yard and should be deleted. If the latter, then the rule should be amended to only apply to that part of the site that abuts the residential zone. The requirement for a tree every 500m2 is overly onerous and seek it is deleted. With large buildings required on industrial sites, space for trees can be limited and may be difficult find suitable locations on site. Most of the areas outside buildings are required for operational and safety of vehicle movement reasons. The frontage landscaping rule is considered sufficient to enhance tree cover and provide an obvious location for trees. In addition, every change of activity will require a landscape plan and a large amount of earthworks to rip up existing sealed areas and provide suitable drainage for trees. This may also trigger the contamination rules under the NESCS given many industrial sites are HAIL sites and require further consents and significant cost for the testing, supervision and monitoring by a contaminated land specialist. Given that the definition for landscape area means ‘the provision of predominantly trees and/or shrub plantings’ and include some ‘ancillary areas of lawn or other amenity features’, the proposed clarification will ensure that the clause only applies to road frontage landscaping. Applying anywhere else is nonsensical and severely detrimental to operations and security of the site. Seek that the amendment states: ‘The road frontage of sites opposite (where only a road separates the zones) a residential zone...’; ‘For sites with parking areas within 5m of a residential zone boundary...’; ‘ Any solid fence shall not be placed between a frontage landscape area and the road boundary.’ <u>Ravensdown fertiliser manufacturer</u> does not support additional tree planting, beyond the requirement for perimeter landscape strips adjacent to residential zones, as the purpose of industrial zones is to provide for the ongoing establishment and operation of industrial activities, not the creation of swaths of green space. It does not oppose the concept of requiring landscaping strips alongside roads, especially where opposite a residential zone, and where a site immediately adjoins a residential zone. Ravensdown has a mature landscape strip established along much of the site frontage with Main South Road and other adjacent local roads. In relation to the broader landscaping requirements, the costs and benefits of requiring landscaping in industrial zones were examined in detail by the Independent Hearing Panel (the Panel) as part of the District Plan Review. The Panel found conclusively that while landscaping is appropriate along arterial road boundaries and opposite residential zones, that the costs and benefits did not warrant landscaping requirements within industrial zones. This finding was consistent with Strategic Objective 3.3.2 to minimise consenting requirements. Landscaping in industrial zones was again proposed in consultation drafts of PC14 (as part of a proposed Financial Contribution framework) and the requirement for landscaping in industrial zones was deleted from the notified version following feedback on the draft. The PC14 Panel clearly found that financial contributions for trees in higher amenity residential zones were not appropriate (at least through an ‘Intensification Planning Instrument’ process). Given the clear recent direction it is frustrating that Council staff are again seeking to relitigate a matter that has been found to not align with section 32 requirements. In addition, it seems incongruous that it is proposed that additional landscaping be applied to industrial zones, but not the rest of the City (e.g., the proposed requirements to plant trees in parking areas and for every 500m2 of a site are more onerous than the landscaping requirements for commercial zones where a higher level of amenity is anticipated). This approach does not represent a fair or balanced resource management approach. <u>Waterloo Business Park</u> do not support the amended rule as the draft increased requirements are excessive and take no account of the effect on the owners and operators of the industrial properties.
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	Two <u>metal recycling businesses</u> do not support the amended rule given the rule would require several trees over their large sites (such as 32 trees over 1600m2) and as they grow their canopies will restrict the operating space available to their business and have potential to damage sealed areas. Commercial industrial land is expensive to rent and to maintain, therefore they need to maximise its use to ensure an economic return to the business for these costs. Concerned about impact on ability to meet with the conditions of groundwater release as working towards developing a fully covered site. Trees will require areas of the site to be exposed so that they may receive rainwater, but it will be challenging at best to ensure that no runoff from our site is included. Numerous trees will also present a health and safety risk to employees, many of whom suffer seasonal pollen allergies. The site is also subjected to strong Canterbury winds, and they've had trees felled by these winds in the past. Creating a safe distance for staff around trees in high winds will not be possible. This requirement, like the stockpiling requirements feels like an endeavour to make their industry 'look' better and speaks to an overall lack of understanding and appreciation for what metal recyclers do. Messy industries exist, and more importantly need to exist. Better that communities are educated to recognise a productive mess from a hazardous one, and better that the 'mess' is contained in yards where it can be responsibly recycled then for it to be spread across riverways and landscapes. Another <u>metal recycling business</u> does not support the amended rule as it will negatively impact upon their ability to run a thriving and successful operation. They have a 5 acre site and need this area to run their business. The planting of multiple trees not only restricts our operating space, they will become a safety hazard (from both wind, weather and allergies), plus their roots have the potential to destroy their sealed yard areas. <u>NZ Association of Metal Recyclers</u> does not support the amended rule given that trees develop a canopy that will reduce the functional space of metal recycling facilities and industrial sites wish to maximise the use of their properties and the value of that property is based on functional area. Many sites are improving management of stormwater runoff by sealing the ground surface with concrete which allows better direction of stormwater runoff to interceptors and other stormwater treatment devices to achieve water quality standards. Trees cannot be planted in concrete and those that are planted nearby will undermine the integrity of sealed surfaces. An <u>industrial property developer</u> does not support the amended rule as increased tree cover will be problematic, leading in many cases to considerable reduction in the efficient use of sites. The landscaping strip width increase will add to inefficient site use and layouts, 2m is preferable. They oppose the requirements for 1 tree per 5 parking spaces as they are not reasonable and can get quite problematic, particularly on sites where parking is spread around the site in bits and pieces, or where there is a large area of parking. 1 tree per 500m2 is similarly arbitrary and unhelpful to efficient site use. Sites with large amounts of building on them, the tree requirement becomes pointless (any parking and trees centrally within the site or behind buildings won't be seen). <u>Environment Canterbury</u> supports increased landscaping requirements as it gives effect to CRPS direction that business activities adopt appropriate urban design qualities (Objective 6.2.2), including healthy working environments (Policy 6.3.6) and aligns with CRPS Policy 7.3.7 to manage impacts of development on freshwater quality, however, seeks biodiversity expertise to identify any appropriate considerations. <u>Selwyn District Council</u> seeks landscaping requirements are more specific, including that maturity height for a tree is specified rather than having general reference to 'medium sized', and to set direction or parameters around the anticipated height at the time of establishing the planting. <u>The Waipuna Halswell Hornby Riccarton Community Board</u> supports proposed amendments. A <u>trade supplier and yard business</u>, regarding planting on the front boundary, notes that Placemakers actually removed trees, at the suggestion of the Council, because they were obstructing the view of oncoming traffic for vehicles leaving the site. A <u>trade supplier and yard business</u> comments added provisions to increase tree cover and landscaping particularly road frontage opposite residential zone could be quite onerous/costly for the length of boundary with residential zones for this particular site and note that the carparking area at the front adjoins a residential zone as it is a road boundary.
Water supply for firefighting	A <u>warehouse and manufacturing company</u> does not support the proposed rule as it could impose huge costs for no real benefit, and one needs to balance of the costs against the benefits such that any activity or plan change that does not have a net benefit should not proceed.

		The Waipuna Halswell Hornby Riccarton Community Board supports proposed amendment. Fire and Emergency New Zealand supports proposed amendment.
Use of heavy vehicles and machinery adjoining residential zones		<u>Two metal recycling businesses</u> do not support the proposed rule and consider it takes very little to comprehend the economic impact that restricting customers to just 30 per day will have on business. Many of these businesses must use heavy vehicles to move their materials and goods and restriction in trade will be devastating and is likely to result in closure impacting staff, customers and communities. They question the legality of the ability to restrict business trade in such a manner. As they are situated in an Industrial Heavy Zone, their sites will not be subjected to the heavy vehicle restriction, however as they deal with and reply on services from other business (e.g., container parks) who are in areas where this requirement will be imposed, they will none-the-less be impacted by it. As an exporter it is highly likely this will have a significant effect on their ability to bring our product to market, and therefore the economics of their business will be threatened. Furthermore, the proposal that the operation of heavy vehicles and machinery outdoors between 10pm and 7am (without consent) to be prohibited will impact a wide range of stakeholders, including the public. They have concerns about the potential impact on freight movement and restricting economic activity. To avoid traffic congestion, bulk freight is often transported overnight or outside of standard business hours. This freight needs to be loaded/unloaded using heavy machinery, so placing these restrictions on business, or requiring them to apply for consent to undertake them is problematic on several fronts. An <u>industrial land owner</u>, a <u>demolition company</u> and a <u>construction and industrial property ownership firm</u> do not support the proposed rule as it precludes mechanical ventilation, refrigeration and use of machinery even when compliant with the noise rules. A <u>demolition company</u> and a <u>construction and industrial property ownership firm</u> consider the proposed rule is inappropriately targeted to apply to all outdoor machinery on any part of a site, where a site adjoins a residential zone. The proposed rule would preclude nighttime deliveries across the entire landholding. The proposed rule would result in substantial operational and functional constraints, especially on larger sites. The proposed rule would require the cessation of night-time operations regardless of whether activities are a considerable distance from any adjoining residential zone and operating in compliance with the operative noise provisions. The resultant uncertainty and demonstration that such activities were lawfully established will result in substantial transaction costs. The restriction on heavy vehicles is unjustified and could well have a highly detrimental consequence for Industrial sites where the existing access adjoins a residential zone. There is no foundation in the higher order planning documents for the proposed provisions. An <u>industrial land owner</u> considers there is no foundation in the higher order planning documents for this approach. Equally the restriction on heavy vehicles is unjustified and could well have a highly detrimental consequence for Industrial sites where the existing access adjoins a residential zone. An <u>individual with interests</u> in the Industrial General Zone does not support the proposed rule and considers the scope seems disproportionate to the issues it sets out to deal with. For example, restricting the number of heavy vehicle movements from sites adjacent to or over the road from residential property is likely to be a problem for businesses. A <u>GIB manufacturing company</u> does not support the proposed rule and seeks that it is deleted. It would result in a consent requirement for the use of the factory for operating after 11pm and before 6am, irrespective of the level of the noise that is produced given the new definition of ‘machinery’ which is overly restrictive and completely without justification. It is not an effective or efficient mechanism in managing potential adverse effects and would result in capturing activities in unnecessary consent framework where there were potentially no adverse. The current manufacturing operation on-site operated 24 hours, 7 days a week, and has a good relationship with the surrounding residential properties and the new rule would significantly limit the ability to supply the South Island’s market with GIB® board. It is considered contrary to the NPSUD Policy 1(b) “Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: (b) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets”. The economic impact and cost to the business would be unacceptable and is not an effective way to manage the potential effects of nighttime noise. The restriction on heavy vehicle trips, particularly for the Industrial Heavy Zone, is considered overly prescriptive without assessing the actual effects and is not aligned with Transport Policy 7.2.1.2: High trip generating activities ‘Manage the adverse effects of high trip generating activities, except for permitted activities within the Central City, on the transport system by assessing their location and design with regard to the extent that they: i. are permitted by the zone in which they are located’.

	<u>Ara Aotearoa Transporting New Zealand</u> and a <u>transport and logistics company</u> do not support the proposed rule as this would permit 30 round trips over 16 hours (two per hour), effectively reducing vehicle movements to unsustainable numbers and crippling businesses who operate their own heavy vehicles or rely on deliveries and pick-ups. Industry does not control inbound or outbound shipping, port operations, commercial rules, shipping schedules, and additionally, the weather plays a significant role in when containers can and cannot be moved. The setbacks and height limits would pose operational challenges for container yard operators, that would have flow-on effects on Lyttleton Port Container Yards in Woolston and Lyttleton, KiwiRail CT Container yard in Middleton Import and Export cargo owners and other freight customers. Placing restrictions on heavy vehicle movements will drastically impact the New Zealand economy from both a fiscal and supply and distribution perspective, which is something that is already struggling due to existing regulations and flow on effects from economic decisions out of local and national Government. There is concern at the time and cost associated with applying for resource consents, particularly given tough economic conditions and sluggish forecast economic growth. A <u>metal recycling company</u> does not support the proposed rule as it will negatively impact upon the ability to run a thriving and successful operation. The heavy vehicle movement restriction will severely restrict their ability to trade with other commercial businesses, especially as service providers for EcoCentral’s scrap metal recycling. With the time period restriction for heavy vehicles and machinery they would need to run split shifts in order to keep up with processing, this will impact the ability to process and onsell. A <u>waste company</u> does not support the proposed rule and seeks that it is deleted. Managing the number of vehicle trips on an undefined number of sites is also problematic, it does not reflect the core function of the zone and the threshold is unworkable. Auckland, for example has a threshold of 100 trips per hour in any zone before an Integrated Traffic Management Plan is enabled. The effects could be better managed through the transport rules for specific trip thresholds of a reasonable size. Other effects are managed through the Regional Plan rules. Interpreting ‘adjoining a residential zone’ will be problematic in defining which sites this applies to and would be better to show a buffer on the planning maps for specific locations where there is an issue rather than blanket all the fringes of the industrial zones with such an onerous requirement. It is against NPSUD objectives as it would significantly constrain capacity and utilisation of the site, stymying portions of the industrial zone. A typical transport depot can have 250+ truck movements per day. It is unclear what it is trying to achieve by restricting daily traffic movements. For clause (b) this is overly onerous and if noise is the reason for the clause, then using the noise rules would allow a variety of solutions to ensure compliance rather than a blanket restriction of operating hours. Many sites require trucks to leave sites before 7am to avoid rush hour traffic and be on other sites when they open. This rule will unduly hamper business within the city, and operational flexibility. An amendment to the noise rules to use NZS6802 would be preferred, allowing a range of solutions including phasing in electric trucks which are far quieter and changing tonal reversing alarms. It should be recognised that the objective recognises that the Industrial Park zone generates higher volumes of traffic than other industries. <u>Ravensdown fertiliser manufacturer</u> does not support the proposed rule as it does not give effect to Strategic Objective 3.3.2 and controlling potential noise generating activities at industrial sites is unnecessary as the Plan noise limits and s16 of the RMA provide Council sufficient scope to address nuisance noise issues citywide. It could place significant restrictions on industrial activities that are appropriately located in industrial zones. For example, there is in excess of 60 heavy vehicle trips per day accessing the site when product is being transferred from a ship at the port and on busy days when product is being dispatched. Industrial activities can be 24 hour operations and therefore the rule is not consistent with appropriately providing for the efficient and effective development of industrial activities in industrial zones. Despite the arterial road separation, the site is ‘adjacent’ to a residential zone, and therefore under the proposed rule no heavy vehicles or machinery can operate during the night-time anywhere on the site, regardless of compliance with noise standards. It is difficult to know how the section 32 costs / benefits analysis has deemed that the benefits in residential amenity could, from an already compliant situation, outweigh the effective closure of a long-established industrial facility during night-time hours where those activities are not generating any unacceptable adverse effects. <u>Lyttelton Port Company</u> do not support the proposed rule as it has the potential to reduce the available land for operations and site functionality and limit design options and usable land area. In the future, this may limit the scale and scope of any expansions of CityDepot. <u>Waterloo Business Park</u> do not support the proposed rule and seeks that it is deleted as it will involve significant restrictions on industrial sites and may make such sites unusable or much more difficult to operate.
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	NZ Association of Metal Recyclers do not support the proposed rule as during peak processing times, such as when ships are at the Port of Lyttelton, the number of heavy vehicle movements is too low. A <u>warehouse and manufacturing company</u> does not support the proposed rule as truck operation after 10pm not being permitted is unduly restrictive and unnecessary and could be a case to close off the road instead. They query what triggers an adverse reaction from a resident who moved into the after some time after the existing business was established. The Fuel Companies do not support PC20 or the proposed rule as service stations and truck stops will be disproportionately affected due to the nature and location of service station activities, as well as many of these sites being across the road from residential zones, and some service stations providing for refiling of trucks resulting in a high number of heavy vehicle movements. It is unclear what would constitute machinery under the draft standards. Many of the service stations and truck stops across the City are located on major arterial road or state highways, where there are already a very high number heavy vehicle movements at all times of day and night. Locating service stations so they are not across the road from a residential zone will not alleviate the problem that PC20 is purporting to address and will likely divert more vehicles (passenger, light commercial and heavy vehicles) onto local roads. Fuel deliveries occur infrequently but often without restriction in terms of frequency or times, and may occur during the hours of 10pm and 7am, because of the lower volume of service station traffic, and to reduce potential health and safety risks to the service stations users. Most service stations across New Zealand are in urban areas, with many of these sites occurring at the interface with residential zones. With suitable controls (such as yard setbacks, landscape, parking locations, refueling points, and outdoor storage areas) service stations generally provide a suitable buffer between residential and other more noxious or offensive industries. Under PC20 many service stations will need to seek a resource consent or will be pushed into other zones, some of which may be less desirable. Similarly, an <u>industrial property developer</u> does not support the proposed rule as restricting heavy vehicle movements are an unreasonable imposition on an arterial or collector road. A <u>vehicle dismantling company</u> does not support the proposed rule as restrictions around vehicle movements will hinder growth and force new development to occur elsewhere. They consider container movement and/or storage should be flexible for that stock. A <u>construction company</u> does not support the proposed rule and seeks that it is deleted as it could hamstring their business. For instance, they regularly complete over dimension transport activities at night and the rule could kerb this resulting in more downtime, more costs and more over width vehicles on the road during the day. <u>Environment Canterbury</u> supports the proposed rule in principle, however, seeks assessment of whether it is likely to deliver a significant benefit and whether it will significantly reduce impacts of heavy vehicle traffic on adjacent residential zones given much of the extent of Industrial zones are adjacent to/mainly accessed by, arterial transport routes that may be carrying significant volumes of heavy vehicle traffic. The Waipuna Halswell Hornby Riccarton Community Board supports the proposed rule. <u>Fire and Emergency New Zealand</u> seeks that the following clause is included in the proposed rule: ‘This rule shall not apply to emergency service facilities’. This will enable fire stations, including Lyttleton Fire Station which is located in the Industrial General Zone and adjacent to a residential zone, to be as resilient as possible, responding to change including increased callouts or need to expand the site.
(South West Hornby)	The Waipuna Halswell Hornby Riccarton Community Board supports the proposed amendment requiring the 20m setback applies only to Marshs Road.
Minimum building setback from road boundaries (Marsh Road)	
Use of heavy vehicles and machinery	A <u>GIB manufacturing company</u> does not support these assessment matters and seeks that they are deleted.

Industrial MoDs	adjoining residential zones	A <u>waste company</u> does not support these assessment matters and seeks that they are deleted and considers the rule does not relate to the built form and therefore a better outcome would be a matter of discretion for a noise rule. The matters of discretion under (b) do not match the vehicle numbers under the rule. Alternatively it should be related to a transport rule where effects on the roading network can be reviewed. Truck movements should not be limited to such a low threshold given the purpose of the zone is to accommodate those types of activities which require truck movements. It is also unclear how vehicle movements contribute to vibration and glare. Dust, odour and fumes are covered by regional rules. <u>Environment Canterbury</u> supports new matters of discretion relating to reverse sensitivity effects as they give effect to CRPS policy 6.3.6(8) to avoid or mitigate reverse sensitivity and CRPS objective 6.2.3(1) to provide for quality living environments.
	Interface with residential zones	A <u>GIB manufacturing company</u> does not support these assessment matters and seeks that they are deleted. They consider that they place unrealistic expectations for residential activities that the residential amenity will be raised through further industrial activity, as well as unrealistic level of mitigation requirements on already lawfully established industrial operations and not in a RMA s32 sense been justified or assessed as being the most efficient and efficient way of achieving the purpose of the RMA, or the objectives in the Plan. A <u>waste company</u> does not support these assessment matters and seeks that they are deleted. Many of effects are better managed under other sections of the District Plan, such as the noise, lighting and transport chapters. Except from exacerbating reverse sensitivity effects, it does not acknowledge the site zoning is for industrial purposes. The assessment matters focus entirely on the amenity effects of the residential sites. The scale of effects proposed to be managed could be interpreted broadly and result in extremely limited activities on the industrial sites affected. <u>Environment Canterbury</u> supports new matters of discretion relating to reverse sensitivity effects as they give effect to CRPS policy 6.3.6(8) to avoid or mitigate reverse sensitivity and CRPS objective 6.2.3(1) to provide for quality living environments. <u>Selwyn District Council</u> seeks that the proposed assessment matters are more specific and directive on amenity.
	Outdoor storage of materials	A <u>GIB manufacturing company</u> does not support this addition and seeks that it is deleted given the wide range of matters already available or alternatively that ‘anticipated’ amenity is changed to ‘existing’ amenity as the proposed wording is contrary to the introductory text of the Industrial Zone chapter and Policy 16.1.2.3. A <u>waste company</u> does not support this addition as it is too broad and seeks it should be qualified to adjoining residential sites only and should not focus on the look or nature of stacked materials when the landscaping clause is effective for this matter. The last matter of discretion will lead to conditions of consent that are difficult to deal with operationally and can be better managed through the noise rules.
Other	Industrial Park (Memorial Avenue) Zone	A <u>company</u> comments that the Industrial Park (Memorial Avenue Zone) has bespoke controls determined through the Replacement District Plan and are most appropriate for this location, including the controls to ensure compatibility with surrounding zones and limiting the scope of activities to enable higher amenity activities like visitor accommodation. They seek that PC20 provisions do not apply to this zone.
	Non-industrial commercial activities	<u>Motel X</u> seeks to differentiate between heavy industrial operations and mixed-use commercial businesses when applying new rules. It also seeks that PC20 does not impose unnecessary restrictions on low-impact commercial accommodation businesses operating in industrial zones, recognizing that well-managed accommodation and wellness facilities can enhance economic viability without creating residential conflict.
	Car parking	One <u>resident</u> seeks that industry is required to supply on-site car parking for staff given that the lack of on-site parking results in staff using on-street parking in front of nearby dwellings which have insufficient off-street parking due to higher density.
	Heavy vehicles on roads	One <u>resident</u> seeks that heavy vehicles are banned from using the residential end of Branston Street (near Amyes Road), and on Amyes Road to reduce the severe impacts on residents and improve safety, including for school kids.

		Another <u>resident</u> similarly seeks a heavy vehicle restriction is placed on Amyes Road to manage the severe heavy traffic impact on residential interface of Branston Street so that Branston Street cannot be used as a shortcut 24/7 interrupting sleep and impacting enjoyment of private property. One <u>resident</u> seeks review of the decision not to extend Blake's Road through to Factory Road and close Factory Road at railway line to protect Belfast residential areas from industrial traffic.
	Residential development exempt from industrial rules	One <u>resident</u> seeks that residential property situated in an industrial zone should be exempt from some of the industrial rules until a business is run from the premise.
	Zoning and subdivision	One <u>resident</u> seeks that access to industrial zones is thoroughly considered before subdivision consents are issued, especially the undeveloped 20 hectares of industrial land in Belfast. They seek that further industrial subdivision consents in Factory Road should [not] be granted until the access is resolved.
	Over the road	One <u>resident</u> supports that metal yards and industrial areas are getting more clarification in the District Plan, however, seeks that ‘over the road’ is clarified and has more specificity to protect those who reside there, and should be a further more defined distance given increased levels at night when there is no background noise. They are not sure whether ‘over the road’ applies to their property as a cemetery is between their property and an industrial area.
	Residential zone references	Selwyn District Council seeks that cross-boundary jurisdictional ambiguity is clarified as it is unclear whether the rules referring to ‘a residential zone’, would apply to those managed by another territorial authority.
	Waterbody Banks	One <u>resident</u> seeks confirmation if PC20 would include an amendment to <i>Appendix 6.11.5.3 Interpretation of banks of waterbodies</i> , given the interpretation issues that arose during the Portlink application regarding the tidally influenced Ōpāwaho Heathcote River.