

Organisations/Businesses

ID	Feedback	Name of organisation/business
31595	Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat Is there anything else we should know or options we should consider when managing the industrial interface? Please consider noise nuisance from persistent alarms going off between 9 p.m. - 8 a.m. in any industrial area within 1km of a residential area. We would also like access to industrial zones to be thoroughly considered before subdivision consents are issued. In Belfast, on Factory Road, there is only one accessway via a residential street only 14 metres wide for over 1,500 traffic movements per day including heavy trucks. The workers driving into this industrial area regularly speed and cause disruptions for the residents. With a further 20 hectares of industrial land rezoned, still to be developed this requires some CCC intervention to resolve. In the Belfast Area Plan an extension of Blakes Road is proposed and the industrial area cut off at the Railway line to leave the residents in peace. To say that won't happen until a particular land owner develops their property is completely unsatisfactory. No further industrial subdivision consents in Factory Road should be granted until the access is resolved. Excel spread sheet attachment available upon request.	Belfast Area Residents Association
31601	Relating to your business, do you: Own and occupy it Nature of business Self storage How long has your business been operating from the site? 10 years+ How close is your site to residential properties? Across the road (or equivalent) Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? We're aware of complaints and that we may impact some residential neighbours; We do our best to manage impacts on neighbouring residential property; We would like to know more about reducing impacts on residential property; 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) Is there anything you'd like to tell us about complaints you receive or your impacts on residential property? Motel X is currently in the planning and approval stages, and the site at 69 Whiteleigh Avenue (alternate entrance 9 Longley Place) is still operating as a self-storage facility. As part of our development process, we are proactively considering how to minimize any potential impacts on neighbouring residential properties. We recognize that operating near residential areas requires careful planning, and our design includes measures such as soundproofing, controlled access, and privacy-focused landscaping to ensure minimal disruption. At this stage, we have not received complaints related to the site's current use as self-storage. However, as we move forward with the Motel X project, we are open to discussions with neighbours and the council to ensure a well-managed and community-conscious operation. How do you manage impacts on neighbouring residential property? Motel X is currently in the planning and approval stage, and the site is still operating as a self-storage facility. However, we are proactively incorporating measures into our design to ensure minimal impact on neighbouring residential properties once operations begin. These include: 1. Noise Mitigation: Planned soundproofing measures in rooms and shared spaces to reduce noise transmission.	Ashville Limited

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	Acoustic fencing and strategic landscaping to buffer sound from the site. A controlled access system to prevent unnecessary foot traffic or disruptions. 2. Privacy & Discretion: Restricted signage and a low-profile entrance design to maintain a discreet presence. Controlled lighting to minimize light spill into neighbouring properties. A gated access system using PIN codes or NFC technology to limit entry to authorized guests and workers only. 3.Traffic & Parking Considerations: No general parking on-site, with spaces reserved only for tradespeople and accessibility-required guests to reduce congestion. Guests encouraged to use nearby offsite parking and public transport to minimize vehicle traffic. 4. Proactive Engagement: While there are currently no complaints, we remain open to feedback from neighbours as development progresses. We are willing to adjust operations where needed to maintain a positive relationship with the community. Our goal is to ensure Motel X operates discreetly, safely, and with minimal impact on its surroundings, providing a well-managed and community-conscious environment. 5. What has been your experience of residential properties impacting your growth? As Motel X is still in the planning and approval stage, we have not yet experienced direct limitations due to neighbouring residential properties. However, we recognize that operating near residential areas requires careful consideration of noise, privacy, and traffic impacts. We are proactively designing Motel X to ensure minimal disruption, with features such as soundproofing, controlled access, discreet signage, and limited on-site parking to respect the surrounding community. At this stage, we are monitoring the proposed changes under PC20, as new zoning restrictions or noise regulations could influence our ability to operate or expand in the future. We remain open to engaging with the council and local residents to ensure Motel X can grow in a way that aligns with both business needs and community expectations. Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Your site’s zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? The Industrial General zoning creates challenges for Motel X, requiring resource consent for accommodation use. A mixed-use or commercial designation would better reflect its low-impact, privacy-focused operations. Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Somewhat Do you have any concerns for how this may impact the future use of your site? Yes. Future District Plan changes, particularly under PC20, could introduce new restrictions on noise, access, or operational flexibility that may limit Motel’s ability to operate and expand. As a low-impact, privacy-focused accommodation and wellness business, Motel X does not create the same environmental or operational concerns as traditional industrial activities. However, being in an Industrial General zone means that any new rules aimed at industrial operations could unintentionally impose constraints on our business. For example: Stricter noise limits may already be met, but additional compliance requirements could add unnecessary costs. Changes to permitted activities may make future expansion more difficult, requiring additional consents or approvals. 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. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface?	

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	Somewhat Is there anything else we should know or options we should consider when managing the industrial interface? PC20 has the potential to improve compatibility between industrial and residential areas by reducing noise, traffic, and environmental impacts. However, it is important that new rules do not unintentionally restrict low-impact businesses like Motel X, which prioritize privacy, security, and discretion. 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.	
31632	Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure Is there anything else we should know or options we should consider when managing the industrial interface? We do a lot of Construction work for the city council. We have just finished the Drummonds Jetty and previously Built the Marshlands/Lower Styx Bridge. We are part of the community. A lot of our staff live near our yard in Belfast and our premisis is our largest asset. We need flexibility to adapt to changing Construction requirements as projects come and go and our business adapta 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. We oppose any increased rules that hamstringing our business. For example we regularly complete overdimension transport activities at night and these new regulations look to kerb this. More downtime, more costs and mover over width vehicles in the road during the day.	Parfitt Construction Ltd
31638	Relating to your business, do you: Own and occupy it Nature of business Customs Brokerage, Warehousing How long has your business been operating from the site? 0-3 years How close is your site to residential properties? Across the road (or equivalent) Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? Neighbouring residential property don't impact business operations; We do our best to manage impacts on neighbouring residential property How do you manage impacts on neighbouring residential property? we have minimal impact, we try to keep this clean on the street ad also help to do neibours lawns Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Don't know/not sure Do you have any concerns for how this may impact the future use of your site? I am unsure of exactly what the rule changes will mean for our site - are you able to send us sopmething more spefici on the chnages to our site? Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure Is there anything else we should know or options we should consider when managing the industrial interface?	Koru Customs & International Freight Limited

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31661	Relating to your business, do you: Operate only Nature of business Distillery How long has your business been operating from the site? 7-9 years How close is your site to residential properties? Not near residential property Which of the following apply to your business? Neighbouring residential property don't impact business operations Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? The ancilliary retail rules excluding sale of products not produced or processed on site will reduce our ability to make revenue from retail customers and tour groups by restricting our ability to sell branded merchandise alongside our consumer products. It doesn't seem to me that this rule change has anything to do with managing impacts on neighbouring residential areas so shouldn't be included in this plan change proposal. If it does somehow have to do with managing impacts on neighbouring residential areas then surely it should be limited to those businesses that are actually neighbouring residential areas. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure	The Spirits Workshop Distillery
31685	Relating to your business, do you: Own and occupy it Nature of business warehousing How long has your business been operating from the site? 7-9 years How close is your site to residential properties? Across the road (or equivalent) Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? Neighbouring residential property don't impact business operations Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? No	R. Redpath Ltd

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	Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? As far as I know all businesses on Sturrocks road are considerate of our neighbours, with no heavy industry in this particular area, I would be very upset if the district plan was to change as it potentially limit what business we can operate from this site. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure Is there anything else we should know or options we should consider when managing the industrial interface? No we live in harmony with our neighbours, hate that change to be forced on us.	
31691	Relating to your business, do you: Own the land and lease/rent it out Nature of business Vehicle dismantling How long has your business been operating from the site? 10 years+ How close is your site to residential properties? Across the road (or equivalent) Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? Neighbouring residential property don't impact business operations Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? No Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? This 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 chnaging but becoming more efficient with off-site storage and logistics. Smaller sites may be require more frequent vehicle movement of stock, etc. Restrictions around vehicle movements will hinder growth and force new development to occur elsewhere.Ilkewise container movement and/or storage should be flexible for that stock. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface?	LAD Services Ltd

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31723	Relating to your business, do you: Own and occupy it Nature of business Commercial building owners, maintenance and fabrication How long has your business been operating from the site? 10 years+ How close is your site to residential properties? Across the road (or equivalent) Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? Neighbouring residential property don't impact business operations Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? no Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Don't know/not sure Do you have any concerns for how this may impact the future use of your site? Yes Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure Is there anything else we should know or options we should consider when managing the industrial interface? We have several buildings including 19 Heathcote Street Woolston and 58 Rutherford Street Woolston and are concerned with any impacts	Unwin Properties Partnership
31724	Relating to your business, do you: Own and occupy it Nature of business Truck dealership How long has your business been operating from the site? 10 years+ How close is your site to residential properties? Shared boundary Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? Neighbouring residential property don't impact business operations; We do our best to manage impacts on neighbouring residential property	Commercial Vehicle Centre Ltd

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	How do you manage impacts on neighbouring residential property? We try to limit excessive noise in our yard outside of normal business hours. Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? We would like to get the rest of our sections at 65 and 67 Racecourse road zone changed from Residential Suburban to Industrial General like the rest of our yard so we can use this area for business purposes. Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Somewhat Do you have any concerns for how this may impact the future use of your site? We may be limited with future building plans for our existing business on our existing site. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? I think you should consider 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 our 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.	
31727	Relating to your business, do you: Own the land and lease/rent it out Nature of business A ballroom teaching studio How long has your business been operating from the site? 0-3 years How close is your site to residential properties? Across the road (or equivalent) Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? 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) What has been your experience of residential properties impacting your growth? At present we have limited hours because of noise limits, these relate to being near residential property, we would be open extra hours if we could. Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? We will finish up with reverse sensitivity exactly the same as effects hospitality in the CBD, why CCC thinks it is good idea to put residential zoning in what has always been an industrial area is	The Ballroom

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	beyond me. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? Longterm as res comes into the area all CCC will get is complaints from both existing industrial users and res occupiers, this is not an area where res should be encouraged.	
31775	Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes Is there anything else we should know or options we should consider when managing the industrial interface? One of the contentious elements of the Portlink development was the problem with determining the "bank" on downstream waterways given the rather confusing definition and diagram in the District Plan (Appendix 6.11.5.3 Interpretation of banks of water bodies). Can you tell us if there is any change to the Interpretation above being included in Plan Change 20	Ōpāwaho Heathcote River Network
31788	Relating to your business, do you: Own and occupy it Nature of business Builders yard , storage How long has your business been operating from the site? 10 years+ How close is your site to residential properties? Shared boundary Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? Neighbouring residential property don't impact business operations; We do our best to manage impacts on neighbouring residential property How do you manage impacts on neighbouring residential property? Seldom work outside 8am to 7pm , mostly used as storage , so very little noise ,etc. Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? no Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Don't know/not sure Do you have any concerns for how this may impact the future use of your site? No , so long as it allows the continued use of the sites for the activities that we do and have done for many years , and does not restrict the development of further storage facilities that we have planned . Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface?	Bowater Builders

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	Don't know/not sure Is there anything else we should know or options we should consider when managing the industrial interface?	
31840	Relating to your business, do you: Own the land and lease/rent it out Nature of business Truck Dealership How long has your business been operating from the site? 10 years+ How close is your site to residential properties? Shared boundary Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? Neighbouring residential property don't impact business operations; We do our best to manage impacts on neighbouring residential property How do you manage impacts on neighbouring residential property? Our business generally only operates during business hours. Any operation carried out during non business hours we try to minimize noise. Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? We would like the zoning at our properties at 65 & 67 Racecourse Road rezoned to general industrial to match 16 Waterloo Road. Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Somewhat Do you have any concerns for how this may impact the future use of your site? Yes. 65 & 67 Racecourse Road are incorporated into our site at 16 Waterloo Road. The zoning boundary runs through these properties. It would be difficult to develop these sites to their potential. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? The condition of the properties should be taken into account when rezoning is being considered.	DT King & Co Ltd
31862	Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes Is there anything else we should know or options we should consider when managing the industrial interface? Please see attached feedback.	Fire and Emergency New Zealand
31864	Relating to your business, do you: Own and occupy it Nature of business Service stations (including truck stops) and bulk fuel terminals	Fuel Companies (comprising Z Energy, bp Oil and Mobil Oil)

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	How long has your business been operating from the site? 10 years+ How close is your site to residential properties? Other (please specify): The Fuel Companies have multiple sites so all of the above apply from a 'shared boundary' to 'not near residential property'. Which of the following apply to your business? We do our best to manage impacts on neighbouring residential property How do you manage impacts on neighbouring residential property? Refer to attached document Your site’s zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? Industrial General Zone and Industrial Heavy Zone Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Somewhat Do you have any concerns for how this may impact the future use of your site? Refer to attached document Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? Refer to attached document 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. This could push service stations into zones that are potentially less suited to the activity or require resource consent for otherwise permitted activities.	
31868	Relating to your business, do you: Own the land and lease/rent it out Nature of business It is an empty land with the intention of putting an industrial / commercial building on the site How long has your business been operating from the site? 0-3 years How close is your site to residential properties? Across the road (or equivalent) Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? Neighbouring residential property don’t impact business operations; We do our best to manage impacts on neighbouring residential property; We would like to know more about reducing impacts on residential property How do you manage impacts on neighbouring residential property? The site is an empty; which has a driveway from musgrove close that does not impact any of the residential houses across Aidanfield Drv Overpass bridge. Understandably any activity would have	Dai's Food Ltd

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	some form of impact, but the distance and the type of activity mitigates it. It is a light industrial / commercial area. Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? commercial and light industrial. At present it is perfectly zones as it needs to be. With low to zero impact to the neighbouring sites. Residential site is actually rather far away from our site. Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? Yes, we bought the site with the intentions to put a industrial / commercial building at the site. 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 our 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, we at minimum want a dispensation of compensation. Ultimately we want to keep and use the land. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat Is there anything else we should know or options we should consider when managing the industrial interface? I respect that there are many blurred boundaries between industrial and residential areas particularly in yaldhurst and Russley area. To blanket add us to those area are not fair and appropriate and will impact on our business's commercial performance. I would say that lands that are 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. As mentioned previously, land were 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.	
31887	Please see the attachment.	Te Whatu Ora - Health New Zealand
	Relating to your business, do you: Own the land and lease/rent it out Nature of business Leasing warehousing and ancillary retail How long has your business been operating from the site? 10 years+ How close is your site to residential properties? Not near residential property Which of the following apply to your business? Neighbouring residential property don't impact business operations Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? Interface between commercial and industrial Particularly in Sydenham is artificial and there is no reason to exclude commercial or retail operations from the General Industrial Zone which are adjacent to commercial zones. Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site?	
31907	New Zealand as a whole imports and distributes products from warehouses in the industrial zone rather than manufacturing on site. A restriction of ancillary commercial activities is overly onerous	Talisman Rentals Limited

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	and unduly restricts use of property in the Industrial Zones. We have one site that is currently unleased and the restrictions on ancillary retail will limit the tenants we can consider for the site reducing our potential income. It also limits options for changing uses of currently leased sites. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat Is there anything else we should know or options we should consider when managing the industrial interface? This amendment proposes changes to all Industrial zoned properties when the vast majority are nowhere near residential properties. The proposal should be confined dealing with housing next door, or close to, land where industrial activities are happening. The changes to ancillary retail operations seems completely unrelated to the problem the amendment is purporting to address and has not been widely notified. I am connected to three industrial properties but only received notification of Plan Change 20 in relation to one of the three. 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.	
31931	Relating to your business, do you: Own and occupy it Nature of business vehicle sales warehouse How long has your business been operating from the site? 7-9 years How close is your site to residential properties? Shared boundary Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? Neighbouring residential property don't impact business operations Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? industrial General Zone Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? As the owner of two sites (20 & 22 Barbour Street) I wish to submit the following. Barbour Street is a dead end street and this causes considerable disruption for the delivery of goods via road. The congestion in the street causes stress and is hazardous. Being a dead end street it is less desirable for industry. I think I am the last owner of two sites in this particular street. Since the earthquake there has been a lot of housing built close by. There are new apartment blocks in and around the area. This makes sense as the suburb is on a good public transport route and is an easy walk to the centre of the city while still being distant enough to avoid the city noise. The site of the old sports stadium would be perfect for housing and this would also be a good option for the 22 Barbour street site as it is an empty lot at present with housing on its boundary. With this in mind I would like the Council to consider making this a residential zone to allow for the future of developing more housing in the Christchurch area. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat	Auto Connect Ltd

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	Is there anything else we should know or options we should consider when managing the industrial interface? Please refer to my entry earlier in this report. Please find attached a concept plan for the development of 20 & 22 Barbour Street. This is a plan I commissioned before I received your letter and it has just come to hand today. I am forwarding this to you to support my submission stating that delivery in the street was chaotic and hazardous. The plan clearly shows the difficulties caused by the zoning at present. With this in mind it would be difficult to develop 20 & 22 Barbour in the future as the access is too difficult to manage. If the zoning was changed to residential it would allow the development of housing in an area close to the city and would tidy the surrounding areas up as well. Being zoned residential would be something for me to progress with in the future as at the moment I couldn't do what I was planning to do.	
32135	Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes Is there anything else we should know or options we should consider when managing the industrial interface? 1. The Board welcomes the Plan Change 20 (PC20) initiative to introduce rules to the District Plan to help manage the effects of industrial activity in proximity to housing and recognises that any changes will not apply to existing activities. 2. The Board 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 and 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. 3. The Board agrees with the proposal that container yards and heavy industrial activities must locate at least 200 metres from residential zones or require resource consent. The Board considers, however that, location within 200 metres from a residential zone should be a discretionary activity rather than a restricted discretionary activity as it sees that this will afford residents' greater protection from any effects on amenity. 4. The Board agrees with the proposal to update the definition of "heavy industrial activity" to list more activities that are "heavy" in nature, such as scrap-metal recycling yards, waste transfer activities and sawmills. 5. The Board agrees with the proposal that for industrial sites next to, or over the road from, residential zones, a maximum of 60 heavy vehicle trips per day and no operation of heavy vehicles or machinery outdoors between 10pm and 7am be required or a resource consent as a restricted discretionary activity with new assessment matters (new rule) be obtained. 6. The Board agrees with the proposal that the measurement of noise be updated to include noise with "special character" (such as bangs, clangs and thumps) where generated within industrial zones and received in residential zones (amended rule). The Board accepts that this measurement will apply to new and not existing industry but wonders whether it could be applied to changes to existing industry where for example significant new and noisier equipment is installed. 7. The Board agrees with the proposal for increased landscaping requirements for industrial sites next to, and over the road from, residential zones, on arterial roads and within industrial zones (amended rule). The Board considers that there should be an exclusive landscape zone provided for that cannot be encroached on by industry. 8. With regard to the proposal that where an industrial site is over the road from other industrial sites, the road setback is reduced to 0m for 50% of the frontage, in combination with increased landscaping (new rule) the Board prefers that there be a setback in this situation to achieve an open corridor appearance. 9. The Board agrees with the proposal that outdoor storage height limit of 3m within 5m of a residential zone boundary, and 5m within 5 to 20m of a residential zone boundary, otherwise it requires consent as a restricted discretionary activity (new rule). 10. The Board agrees with the proposal that outdoor storage is required to be outside the building setback from a residential zone (3m for Industrial General and Heavy zones, 6m for Industrial Park zone) (new rule). 11. The Board agrees with the proposal for a building height limit of 20m between 20m and 200m of a residential zone within Industrial General and Heavy zones (and retain 15m height limit within 20m of residential zone) (new rule). 12. The Board agrees with the proposal that Non-complying activity status for residential, guest accommodation, education and healthcare activities within the Industrial General and Park zones (new rule)	Waipuna Halswell Hornby Riccanton Community Board

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	13. The Board agrees with the proposal for a rule requiring water supply for firefighting provides greater flexibility for acceptable alternative solutions (amended rule). 14. The Board does not support the provision that ancillary retail within industrial zones is not enabled to sell stored products (only products produced or processed on site) (amended rule) as it considers it is too restrictive. 15. The Board agrees with the proposal for provision of clarification in the South West Hornby industrial area by amending a building setback rule to refer to Marshs Road (amended rule). 16. The Board is unsure on the reasons for the proposed replacement of the fuel-burning rate of 1000kg/hr within "heavy industrial activity" with 40kW hour (amended rule) and therefore in the absence of clarification offers no comment on this proposal. 17. Going forward the Board seeks to ensure that where possible the District Plan affords the highest level of protection for residents in dwellings at the Industrial/residential interface.	
32158	Relating to your business, do you: Own the land and lease/rent it out Nature of business developer of several industrial properties How long has your business been operating from the site? How close is your site to residential properties? Other (please specify): various Do you have or use a driveway that has residential homes on it? Which of the following apply to your business? Neighbouring residential property don't impact business operations Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? No, industrially zoned Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? 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. Increased tree cover will be problematic, leading in many cases to considerable reduction in the efficient use of sites. Proposed rules restricting heavy vehicle movements are an unreasonable imposition on an arterial or collector road. Removing "stored" products from ancillary retail definition is an unnecessary constraint that would not appear to achieve any particular amenity change, especially as ancillary retail is heavily restricted already. The proposed increase of landscaping strip width requirements will further add to inefficient site use and layouts, 2m is preferable. The proposed new height limit for buildings within 20m and 200m of a residential zone is too restrictive. Prefer no height limit or a more reasonable one of perhaps 30m. Restricting height where the zone boundary is separated by a road is also unnecessary. If container storage is the driving concern here, restrict this height control to container yards. Buildings can otherwise be adequately controlled at the residential zone boundary under the existing building height and recession plane rules. We oppose rule 16.4.2.6 (iv) - these sorts of requirements for 1 tree per 5 parking spaces are not reasonable. They can get quite problematic, particularly on sites where parking is spread around the site in bits and pieces, or where even there is a large area of parking. (v) is similarly arbitrary and unhelpful to efficient site use. Also, with 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).	St Lucia Properties Ltd

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ID	Feedback	Name of organisation/business
	Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? We think the rules as they stand are working fine. We've 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. 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. The costs potentially introduced to industrial land users as a result of this plan change will fall solely on those users and those costs do not stack up in terms of Section 32 of the RMA.	
32213	Relating to your business, do you: Operate only Nature of business metal recycler How long has your business been operating from the site? 7-9 years How close is your site to residential properties? Across the road (or equivalent) Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? We would like to know more about reducing impacts on residential property; We do our best to manage impacts on neighbouring residential property How do you manage impacts on neighbouring residential property? By operating workable hours of daylight Monday to Saturday. Since early complaints by neighbors in 2018 we reduced operating hours from 7 am start to 8am start and we never work later than 6pm in summer, winter even less. Very rarely do we work after midday Saturday and we have never worked Sunday. Now that we 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. Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? see my submission Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? Council could not provide a fact sheet within a reasonable time frame , so how do they expect people to comment ?	National Steel Limited
32252	Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes	Addington Neighbourhood Association

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ID	Feedback	Name of organisation/business
	Is there anything else we should know or options we should consider when managing the industrial interface? We hope 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. Along Lincoln Road in Addington, several housing developments have replaced commercial/industrial businesses. Hopefully this means that residential and industrial properties can live in harmony. Noise rules should apply equally to houses and businesses.	
32277	Relating to your business, do you: Own and occupy it Nature of business Car sales businesses How long has your business been operating from the site? 10 years+ How close is your site to residential properties? Shared boundary Do you have or use a driveway that has residential homes on it? No Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? see attached. Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? See attached. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure Is there anything else we should know or options we should consider when managing the industrial interface? See attached. We are of the view that the plan change could help manage residential / industrial interface issues but through rezoning rather than changes to industrial zone provisions, in the instance of this particular property (see attached evaluation).	Hollands Motors Limited
32278	Relating to your business, do you: Own and occupy it Nature of business warehousing and manufacturing How long has your business been operating from the site? 10 years+ How close is your site to residential properties? Across the road (or equivalent) Do you have or use a driveway that has residential homes on it? No	lesmau Investments Ltd

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ID	Feedback	Name of organisation/business
	Which of the following apply to your business? We do our best to manage impacts on neighbouring residential property How do you manage impacts on neighbouring residential property? Respond to issues about traffic volume, turning circles, or noise and debris Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Your site’s zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? At present the zoning is acceptable as it enables the business that are located there to continue to operate in the manner for which consents were sought. Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? We are concerned that our 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. Why should those 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 here 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 et al. Residences have at some time got to realise that in order to allow unchecked growth of houses, there needs to be a considerations of higher density housing, apartments etc . The simple fact is that unabated growth of housing and with that the increased rights of residences will adversely impact on the economic environment. We need people to recognize that we all have rights and changing one person's rights by denying another person's rights is grossly unfair and inequitable. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes Is there anything else we should know or options we should consider when managing the industrial interface? There needs to be balance in any changes. There also needs to be some recognition of the economic and financial impact of any changes to zoning etc. For instance the changes to fire fighting in respect to water supply could impose huge costs for no real benefit . Yes any cost in this activity may result in some bvenefit but 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. 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. Yes if an entirely new business was to be established that had no attachment to the existing activity, then the new planning changes might apply. Truck operation after 10.00pm would under the new plan not be permitted. This seems unduly restrictive and quite unnecessary. If indeed there was reason why the passage of a truck down a road and into a business premise should not now be permitted then there is a strong case to close off the road entirely , least there be some passing truck or vehicle which passes through. What is it about the truck activity , say one or two of whatever, that suddenly triggers and adverse reaction from a resident who moved into the area some time after the existing business was established.? 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. All of these changes and amendments have 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 . That hardly seems fair and equitable and is will not assist in the improved economic welfare of the region. 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.	
32279	How close is your site t No	NZ Association of Metal Recyclers

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ID	Feedback	Name of organisation/business
	Is there anything else we should know or options we should consider when managing the industrial interface? Please refer to attachment	
32280	Relating to your business, do you: Operate only Nature of business Metal Recycling Yard How long has your business been operating from the site? 10 years+ How close is your site to residential properties? Not near residential property Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? No Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? Yes Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? Please see attached document	Trillo Metals Ltd
32282	Relating to your business, do you: Own and occupy it Nature of business Various How long has your business been operating from the site? 10 years+ How close is your site to residential properties? Shared boundary Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? Neighbouring residential property don't impact business operations Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? No Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)?	Waterloo Business Park

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ID	Feedback	Name of organisation/business
	Yes Do you have any concerns for how this may impact the future use of your site? Yes, refer to the attached submission. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? Refer to the submission	
32283	Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes Is there anything else we should know or options we should consider when managing the industrial interface? Please see attached feedback.	Environment Canterbury
32285	Relating to your business, do you: Own and occupy it Nature of business Container storage and repair How long has your business been operating from the site? 10 years+ How close is your site to residential properties? Across the road (or equivalent) Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? We're aware of complaints and that we may impact some residential neighbours Is there anything you'd like to tell us about complaints you receive or your impacts on residential property? Please refer to attached PDF Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Somewhat Do you have any concerns for how this may impact the future use of your site? Please refer to attached PDF Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat Is there anything else we should know or options we should consider when managing the industrial interface? Please refer to attached PDF	Lyttelton Port Company
32288	Relating to your business, do you: Own the land and lease/rent it out	JSP Trust

Feedback received on the Plan Change 20, May 2025

ID	Feedback	Name of organisation/business
	Nature of business Warehousing How long has your business been operating from the site? 7-9 years How close is your site to residential properties? Other (please specify): The border at the back of the property there is a swale and I would guess about 10m of grass/planting before a residential housing area Which of the following apply to your business? Neighbouring residential property don't impact business operations Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? We see no reason to exclude commercial or retail operations from the General Industrial Zone where commercial zones are in close proximity Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? In the industrial zone of our building the primary purpose is warehousing for the most part is distribution of products not manufacturing on site. If there was to be restrictions of ancillary commercial activities this would impose too onerous a restriction on use of property in an Industrial Zone. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat Is there anything else we should know or options we should consider when managing the industrial interface? 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.	
32292	Relating to your business, do you: Operate only Nature of business warehousing, b2b distribution How long has your business been operating from the site? 4-6 years How close is your site to residential properties? Further away Which of the following apply to your business? Neighbouring residential property don't impact business operations Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? No - Industrial General Zoning is fine Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes	The Crystal People Limited

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ID	Feedback	Name of organisation/business
	Do you have any concerns for how this may impact the future use of your site? Our business currently operates 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. Given the current definitions in the plan, some of our operations are permitted as ancillary retail. If the proposal to change the ancillary retail rules are proceeded with, then if I was to reestablish my 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 I would have to amend business practice. I only 'process' a certain amount of materials on my site, and most of it is stored for wholesale to qualified customers only. I am anticipating I will change locations in the next 3-5years to a more affordable premises, and am looking at other industrial general sites. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat Is there anything else we should know or options we should consider when managing the industrial interface? With respect to ancillary retail rules: If this was to become a non-complying activity status, the consent 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.	
32293	Relating to your business, do you: Operate only Nature of business Warehousing, online sales and ancillary retail How long has your business been operating from the site? 4-6 years How close is your site to residential properties? Not near residential property Which of the following apply to your business? Neighbouring residential property don't impact business operations Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? Interface between commercial, industrial and retail particularly in Sydenham is artificial and there is no reason to exclude commercial or retail operations from this area. We believe the Industrial Zoning of area of Sydenham bounded by Moorhouse Avenue, Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? New Zealand as a whole imports and distributes products from warehouses rather than manufacturing on site. Current businesses in Sydenham would have to move if they were not allowed ancillary retail of products which were not produced on site. A restriction of ancillary commercial activities to good produced on site is overly onerous and unduly restricts use of property in the Industrial Zones. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat Is there anything else we should know or options we should consider when 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.	Yogijis Food Mart

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	This amendment proposes changes to all Industrial zoned properties when the vast majority are nowhere near residential properties. 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. The changes to further restrict ancillary retail operations seem completely unrelated to the problem the amendment is purporting to address and has not been widely notified. I only heard about this proposal because my landlord received notice in relation to another property and passed on the information. Further restriction of ancillary commercial activities is overly onerous and unduly restricts use of property in the Industrial Zones. In our case 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.	
32297	Please see the attachment.	Argosy Property No.1 Limited
32298	Please see the attachment.	Planz Consultants Ltd
32299	Please see the attachment.	Waihoru Spreydon-Cashmere-Heathcote Community Board
32300	Please see the attachment.	Enviro NZ
32301	Please see the attachment.	Resource Recycling Technologies NZ Ltd
32302	Please see the attachment.	NZ Express Transport (2006) Ltd
32305	Please see the attachment.	Annex Developments Ltd
32306	Please see the attachment.	Ia Ara Aotearoa Transporting New Zealand Inc
32307	Is there anything else we should know or options we should consider when managing the industrial interface? The provisions for the Industrial Park (Memorial Avenue) Zone were relatively recently determined through the Replacement District Plan process. The provisions have been set on a site specific basis, following comprehensive consideration of the site context, outcomes sought in this location, and appropriate controls on all activities and built form enabled. As a result, the provisions build on the wider Industrial Park provisions to provide a bespoke set of rules for the Memorial Avenue site, to ensure that effects are compatible with surrounding zones/activities and that desired levels of amenity are achieved. Integral to the outcomes for the Memorial Avenue site is the scope of activities enabled, which limit the presence or location of specific activities that are likely to result in lower amenity or off-site effects, and enable a broader range of higher amenity activities (including visitor accommodation). This control on activities inherently limits the nature of effects, including off-site effects. Further, the Industrial Park (Memorial Avenue) Zone rules make site-specific provision for: • Building heights across the zone; • Setbacks and landscaping requirements, particularly at the boundary of the zone, where the level of landscaping required is greater than is ordinarily required in other industrial zones; • Open space areas within the zone. Miles Premises Limited seeks that amendments proposed through Plan Change 20 which are intended to address issues relating to industrial zones generally, do not affect the Industrial Park (Memorial Avenue) Zone provisions, which remain the most appropriate for that site. Proposed provisions of concern include, but are not limited to: - Requirements and direction for increased landscaping strips and increased canopy cover; - Further restrictions on ancillary retail, to remove provision for ancillary retail of goods stored on the site; - Requirements for additional building setbacks; and - Controls on outdoor storage, including in association with yard-based suppliers. In respect of the proposal to include health care facilities and guest accommodation within the list of non-complying activities in the Industrial Park Zone, Miles Premises seeks that this is carefully drafted to ensure that the provision for health care facilities and visitor accommodation in the Industrial Park (Memorial Avenue) Zone is retained without amendment. We request the opportunity to meet with you to discuss the proposed provisions as they would apply to the Industrial Park (Memorial Avenue) Zone in more detail prior to finalisation of PC20 for notification.	Miles Premises Limited
32308	Is there anything else we should know or options we should consider when managing the industrial interface? Kāinga Ora have the following feedback for the PC20 Industrial Plan Change: • Proposed Amendments to Rule 16.4.1.5 “ Non-Complying Activities (NC4) - o We oppose the proposed amendments to Rule 16.4.1.5 (NC4), which change the activity status for residential activity in the Industrial General Zone to non-complying. This change will directly	Kāinga Ora

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ID	Feedback	Name of organisation/business
	impact Kāinga Ora-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. - o We consider the proposed activity status inappropriate for existing, established residential uses and request an alternative approach be adopted. This approach should recognise existing use rights and enable the continued operation of these sites, including the ability to undertake repair, maintenance, replacement, and reasonable extensions to homes, without triggering the need to comply with unrelated Industrial General Zone standards. - o If the plan change cannot accommodate this approach within the current framework, Kāinga Ora recommends that Plan Change 20 be expanded in scope to include rezoning proposals, particularly for older industrial areas, which are predominantly residential in character despite their current industrial zoning. â€¢ Support for Residentialâ€“Industrial Interface Improvements - o Kāinga Ora broadly supports many of the proposed amendments in Plan Change 20 that aim to improve outcomes at the residentialâ€“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 our customers is directly impacted by the quality of the surrounding environment, and we support changes that reduce conflict and enhance the liveability of interface areas. â€¢ Noise Standard Improvements (Accounting for â€“Special Characterâ€™ Sounds) - o We support the proposed updates to noise measurement standards, particularly the introduction of special character sound considerations. This better reflects the lived experience of residents and will support improved sleep and wellbeing outcomes in affected homes.	
	Is there anything else we should know or options we should consider when managing the industrial interface? As the potential implications of the provisions that are contained in DPC20 would result in substantial restrictions for WWB Opawa Road site, we seek the opportunity to discuss our feedback with you and the respective Planners.	
32309	See the full submission in the attachment.	Winstone Wallboards Limited
32311	See the full submission in the attachment.	Waltham 67
32312	See the full submission in the attachment.	CERES New Zealand LLC
32331	See the full submission in the attachment.	Metal Corp
32379	See the full submission in the attachment.	Calder Stewart Development Limited
32555	See the full submission in the attachment.	Novo Group
32595	See the full submission in the attachment.	Selwyn District Council
32820	See the full submission in the attachment.	KiwiRail
32821	Is there anything else we should know or options we should consider when managing the industrial interface? In short, our client 880 Main North Road Limited (Richard Peebles) owns a large part of the North Belfast IG zone, adjacent to Main North Road. 880â€™s land occupies the majority of the area outlined in the markup of the planning map below, which extends from the existing RS zone to the south, to the Main North Road to the west and north, and to the main trunk rail corridor (and IG zone beyond this) to the east. Aside from 880â€™s land, there is Council owned land in the northern/northeastern corner of the block and some other privately owned land in the southeast corner. Richard has been looking at developing this land for sometime now for residential purposes and applied for listing in the Fast Track Approvals Act 2024 for a residential development and a CCC stormwater management facility per the attached scheme plan. Whilst the project was recommended for inclusion in the Act on its merits, ultimately, the project didn’t make the schedule of listed projects so would need to reapply for fast tracking, appreciating the uncertainties of that process (time, cost, process, outcome, etc) and factoring in any changes to the design. Noting that PC20 may provide for the consideration of rezoning of land at industrial/residential interfaces, I had brief conversations last week with: Brian Norton on Council’s likely views on this from a stormwater perspective (no concerns) and Sarah Oliver on the potential scope to include it in PC20 (insofar that rezoning might enhance the resi/industrial interface in this location) and key issues (main one being potential odour-related reverse sensitivity). That didn’tthrow up any fundamental issues/hurdles. Iâ€™ve since had a chance to talk through this with Richard who (today) has indicated that he is interested in the opportunity to rezone the land for residential purposes, through PC20. Given that Richard has only confirmed this today, we won’t be able to get anything more through to you today, but I thought it useful to make contact in order to put this on your radar ASAP and otherwise find out exactly what would be of use. Without having given it much thought yet, at this point Iâ€™d envisage the following information would be particularly important: a. Something that frames up how any alternative zoning would work (i.e. adopting, or where relevant updating, the current ODP and area-specific provisions for IG(North Belfast) and applying the equivalent to any new zoning in order to manage any location-specific effects/issues (i.e. spring setbacks, ODP depiction of stormwater area, linkages, etc)).	880 Main North Road Limited (Richard Peebles)

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ID	Feedback	Name of organisation/business
	b. An options assessment for the land area, considering: status quo, RS or other residential zoning, commercial zoning (being the main/obvious options that spring to mind). c. An assessment of (primarily odour related) reverse sensitivity effects. d. An assessment of residential and industrial land supply implications. If you could let me know your thoughts on the above, what if anything else you might need if we were to pursue this, and when, that would be great. If its easiest to have a quick catch up to go through this, please let me know when might suit.	
33253	Relating to your business, do you: Own the land and lease/rent it out Nature of business vehicle sales warehouse How long has your business been operating from the site? 7-9 years How close is your site to residential properties? Shared boundary Do you have or use a driveway that has residential homes on it? No Which of the following apply to your business? Neighbouring residential property don't impact business operations; 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) What has been your experience of residential properties impacting your growth? Cannot build another warehouse because on residential boundary restrictions - would like to build residential housing on the 2 properties I own in Barbour Street. Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Yes Your site's zoning can be found here on the property search: https://districtplan.ccc.govt.nz/ Do you have any issues with the way your site is zoned? light industrial Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? The sites are restricted because of residential boundary restrictions - a concept plan for another warehouse has been submitted before in the hope the council will understand that because of these restrictions a proper working warehouse cannot be built. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes Is there anything else we should know or options we should consider when managing the industrial interface? As stated before	Auto Connect Ltd
33330	Nature of business Trade supplier and yard (Placemakers)	Cranford Street Properties Limited

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ID	Feedback	Name of organisation/business
	How long has your business been operating from the site? 10 years+ Which of the following apply to your business? Yes__Neighbouring residential property don’t impact business operations ___We’re aware of complaints and that we may impact some residential neighbours ___We do our best to manage impacts on neighbouring residential property ___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) ___We would like to know more about reducing impacts on residential property ___Over the next 2-10 years do you plan on expanding or changing your business operations particularly at the residential-industrial interface? Do you have any issues with the way your site is zoned? No How close is your site to residential properties? Shared boundary Do you have or use a driveway that has residential homes on it? No Do you think that these rules will impact your future business decisions (in terms of diversifying or expanding)? Yes Do you have any concerns for how this may impact the future use of your site? Yes, the site is not a big site by Industrial G standards (see attached map) and is entirely surrounded by Residential Suburban Zone except part of one boundary. Residential Suburban is also across the road. This mens the new restrictions in respect to distances of activities to residential boundaries will affect this site more than many others. The following proposed rules in particular could be problematic: -A change of activity to include container yards would need resource consent anywhere on the site as the whole site is less than 200m long. -Change for this site from discretionry to non-complying activity sttus 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 actvities 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 tgis smaller industrial site. -Added provisions to increase tree cover and landscaping particularly road frontage opposite residential zone e.g., minimum width strip of 3m plus 1 tree for every 10m of road frontage; internal boundaries to have landscaping strip of 2m, plus one tree for every 10m of boundary; car parking areas adjoining residential zone: 1 tree for every 5 car parks; could be quite onerus/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. -The policy support for the planting rules is also considered to be excessive. The policy also has two coponents 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 accompying 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 pprpriately 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 yhe 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. To improve this policy it is suggested it could be reworded as follows: g. Activities in industrial zones incorporate planting to improve the [quality/amenity] of the residential/industrial interface; and h. Any planting required at the residential/industrial interface is appropriately located to avoid conflict with activities on the site or cause safety issues. -The amendment to Policy 16.4.3.2 to include b iii, is also a concern. As currently worded this policy would actually require an 'improvement' in residential amenity as the industrial zone is developed or activities change. This is considered excessive and could create an unreasonable burden or high bar for the owner/operator of an industrial activity. It my not be possible or	

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	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. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes Is there anything else we should know or options we should consider when managing the industrial interface? I did have some trouble downloading files as it seemed to only accept one file document and I couldnt get them to download together Over the past 10 years, how many times have you made a submission on a Christchurch City Council project? NA Cranford Street Properties Limited also noted the following: Regarding planting on the front boundary, Placemakers actually removed trees, at the suggestion of the Council, because they were obstructing the view of oncoming traffic for vehicles leaving the site.	

Individuals

ID	Feedback	Name
31566	How close is your home to industrial properties? Across the road (or equivalent) Do you have or use a driveway that has industrial property on it? No If any, what type of industrial activity has effects on your residential property? Little Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? I believe this change might help to reduce the impact of noise and dust on housing, but will result in more inefficent use of land in the city, making land more expensive, making housing more expensive in addition to the cost of running a business. Further seperating industrial and housing areas will also increase the distances from peoples jobs, worsening traffic and encouraging car ownership which comes with a long list of negative impacts on the city. No one is forced to live in low quality housing, and low quality housing also tends to be cheap housing. There is a cost of living and cost of housing crisis. Perhaps the city should focus on reducing regulations on housing such as build limits and minium car parking requirements which would enable higher quality, cheaper housing further from undesierable locations. The city should be very reluctant to introduce any new regulation as regulation is slowly increasing the cost and difficult of doing everything and often is too focused on solving a particular issue without considering the wider impacts. In this case yes you might achieve reducing the number of houses exposed to noise and dust, but at the cost of land, potentially jobs, cheap housing and worse traffic. In many ways reducing regulation and allowing the city naturally evolve and allocate reasources to where theyre needed is better than extensive regulation and planning which restricts peoples freedom to choose how they live their lives	Peter Earl
31573	How close is your home to industrial properties? Across the road (or equivalent) Do you have or use a driveway that has industrial property on it? No If any, what type of industrial activity has effects on your residential property? Container yards, sheepskin factory If any, what challenges does your home face relating to neighbouring industrial property? Noise; Visual impact; Dust; Vibration How frequently are you impacted? Every day/night What time of day does it occur? During the day (7am-5pm); Evening (5-10pm) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure Is there anything else we should know or options we should consider when managing the industrial interface? The amenity value of the views of the Port Hills for low income suburbs.	Eddie Hayes
31579	How close is your home to industrial properties? Across the road (or equivalent) Do you have or use a driveway that has industrial property on it? No	Andrew McKay

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ID	Feedback	Name
	If any, what type of industrial activity has effects on your residential property? Mechanic If any, what challenges does your home face relating to neighbouring industrial property? Other (please specify): none How frequently are you impacted? More specific (please specify): never What time of day does it occur? More specific (please specify): never Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? Why do you let houses intrude into heavy industrial areas such as Woolston / Ferrymead, an area that is serviced to support heavy industry.	
31584	How close is your home to industrial properties? Further away If any, what challenges does your home face relating to neighbouring industrial property? Noise How frequently are you impacted? Once a month What time of day does it occur? During the day (7am-5pm) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? Noise levels at the Styx Road eco center	Mark Neilson
31599	How close is your home to industrial properties? Further away If any, what type of industrial activity has effects on your residential property? Trucks - dangerous driving Visually dispelasing If any, what challenges does your home face relating to neighbouring industrial property? Visual impact How frequently are you impacted? Every day/night What time of day does it occur? During the day (7am-5pm) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes	Rebecca Robin

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ID	Feedback	Name
	Is there anything else we should know or options we should consider when managing the industrial interface? Even with Traffic calming these areas become increasingly dangerous to drive through	
31609	How close is your home to industrial properties? Further away If any, what type of industrial activity has effects on your residential property? Container yards, vehicle scrap yards, other industrial business If any, what challenges does your home face relating to neighbouring industrial property? Noise How frequently are you impacted? Every day/night What time of day does it occur? Early mornings (3-7am) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes Is there anything else we should know or options we should consider when managing the industrial interface? I would like to know if there is already a before 7am noise restricted zone.	Sharon Close
31626	How close is your home to industrial properties? Across the road (or equivalent) Do you have or use a driveway that has industrial property on it? No If any, what type of industrial activity has effects on your residential property? All sorts and you've just opened up a whole new industrial area down the road If any, what challenges does your home face relating to neighbouring industrial property? Noise; Odour; Vibration; Other (please specify): Speeding How frequently are you impacted? Every day/night What time of day does it occur? Early mornings (3-7am); During the day (7am-5pm); Evening (5-10pm) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? Council should be held to task about opening up new industrial areas without considering the impact on residents. For example; you have opened up two new industrial areas since I moved here. I had thought I was only having to deal with Factory traffic. And now a second area has opened up and you STILL haven't dealt with the issue of traffic (some of it incredibly fast and BIG) through our neighbourhoods (coz now its a dead end street). You HAD plans to open up Blakes or Station Road but now you make excuses that you can't coz you have to buy property to do so. SO YOU SHOULD NOT HAVE PUT THAT INCREDIBLE BURDEN on us and opened up the additional industrial areas until you got your ducks in a row ... but of course you want the money from the development ... so we get thrown under the bus. Station Road would be perfect as there is PLENTY of space ... looks like its owned by the railway ... so council CAN AND SHOULD run a road up there.	Jacqui Freeman

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	YOU SHOULD NOT BE ALLOWED TO STEAL DEVELOPMENT CONTRIBUTIONS FROM NEW INDUSTRIAL DEVELOPMENT WITHOUT FIRST SORTING OUT ROADS AND ACCESS THAT WON'T PUT HARM ONTO RESIDENTIAL NEIGHBOURS. That is the BIGGEST issue in my opinion. So focus on your own issues before you go and point fingers at the actual industrial businesses.	
31633	How close is your home to industrial properties? Further away If any, what type of industrial activity has effects on your residential property? The Lyttelton Port If any, what challenges does your home face relating to neighbouring industrial property? Noise; Dust; Odour How frequently are you impacted? Once a month What time of day does it occur? More specific (please specify): Any time Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat Is there anything else we should know or options we should consider when managing the industrial interface?	Melanie Karst
31634	How close is your home to industrial properties? Further away If any, what type of industrial activity has effects on your residential property? General light industrial a short walk away If any, what challenges does your home face relating to neighbouring industrial property? Visual impact How frequently are you impacted? Once a week What time of day does it occur? During the day (7am-5pm) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes Is there anything else we should know or options we should consider when managing the industrial interface? Proposed rule 16.4.2.2 a iv appears ill conceived. It allows for 0m setback to industrial areas facing other industrial areas. Yet this does not consider neighbouring or nearby residential properties. 0m set is likely to result in extremely poor visual amenity, yet many light industrial areas are immediately adjacent to residential. Recommend that this rule is removed to effectively require 2m setback. Alternatively that rule 16.4.2.2 a ii (3m setback for industrial opposite residential) also applies to any industrial area within 200m of a residential zone (i.e same distance parameter as 16.4.2.1 b, to create a 'border zone' of lesser visual impact). For example of general industrial near, but not opposite residential, refer north end of Roydvale Ave.	Jared Keen
31635	How close is your home to industrial properties? Not close to industrial property If any, what type of industrial activity has effects on your residential property? None that I know of Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface?	Marla Hughes

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ID	Feedback	Name
	Don't know/not sure Is there anything else we should know or options we should consider when managing the industrial interface? I do not think it is a very good idea for the city to formally restrict industrial activity. Industry is vital for the economic success of our city and our region, and should be encouraged, not limited. For firms that already exist and are prospering, I find it totally inappropriate to tell them they cannot expand their activities! Many of the other details in the proposed changes to the District Plan are stereotypical examples of local government seeking to micromanage: one example is "60 heavy vehicle trips per day"?? If any sort of "restriction" on new industries was put in place, the only one I think would make any sense at all would be to direct future industrial development to major roads or preferred areas of the city. But this should be done in the form of incentivizing industrial business firms to use these thoroughfares rather than by forcing them. There are various ways these businesses could be encouraged to locate along certain routes, and the Council should look into these.	
31636	How close is your home to industrial properties? Further away If any, what type of industrial activity has effects on your residential property? 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. If any, what challenges does your home face relating to neighbouring industrial property? Noise; Odour How frequently are you impacted? More specific (please specify): Once or twice a year What time of day does it occur? Night (10pm-3am) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes	Andrew Massie
31641	How close is your home to industrial properties? Other (please specify): My home is on an industrial zone If any, what type of industrial activity has effects on your residential property? Businesses operate behind my property and near my property. There is release of gases BOC and testing of engines that impact my property but mainly it's pretty quiet so not bothered by it generally quiet weekends and evenings If any, what challenges does your home face relating to neighbouring industrial property? Noise; Other (please specify): Gas release from bottles noise and sometimes high pitched squeal How frequently are you impacted? More specific (please specify): Irregularly for gas and squeal but engine testing once a month they also dangerously drive on Epsom Road at speed What time of day does it occur? More specific (please specify): Squeal can be hours and anytime. Engines evenings or weekends Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure Is there anything else we should know or options we should consider when managing the industrial interface? When residential property is situated in an industrial zone we should be exempt from some of the industrial rules until a business is run from the premise	Sharon Healy
31643	How close is your home to industrial properties? Further away	Alison Murray

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ID	Feedback	Name
	If any, what type of industrial activity has effects on your residential property? Warehousing, manufacture, freight storage and movement If any, what challenges does your home face relating to neighbouring industrial property? Vibration; Other (please specify): Traffic congestion and volume has sky rocketed cause more dngerous roads. How frequently are you impacted? Every day/night What time of day does it occur? During the day (7am-5pm); Evening (5-10pm) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat Is there anything else we should know or options we should consider when managing the industrial interface? With the move of people from the East post the earth quake 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.	
31648	How close is your home to industrial properties? Other (please specify): One house back from Factory Rd, less that 100m from new industrial area If any, what type of industrial activity has effects on your residential property? Land preparation for industrial site. Concerned about what it will be like once building starts. If any, what challenges does your home face relating to neighbouring industrial property? Dust; Odour; Vibration; Noise; Other (please specify): Traffic on Factory Rd, entry into intersection Factory Rd and Tyrone st How frequently are you impacted? Every day/night What time of day does it occur? During the day (7am-5pm) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? Review decision not to extend Blake's Rd through to Factory Rd and close Factory Rd at railway line. Keeping all that industrial traffic from Belfast residential areas is safe and common sense. How do you allow an industrial area to go ahead and not make provisions to keep traffic out of residential areas	Debbie Woods
31663	How close is your home to industrial properties? Across the road (or equivalent) Do you have or use a driveway that has industrial property on it? No If any, what type of industrial activity has effects on your residential property? none If any, what challenges does your home face relating to neighbouring industrial property? Other (please specify): None	Max Headroom

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ID	Feedback	Name
	How frequently are you impacted? More specific (please specify): never What time of day does it occur? More specific (please specify): never Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No	
31753	How close is your home to industrial properties? Not close to industrial property Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes	Michael Thorley
31754	How close is your home to industrial properties? Not close to industrial property Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes	Grant McGill
31781	How close is your home to industrial properties? Further away If any, what challenges does your home face relating to neighbouring industrial property? Visual impact How frequently are you impacted? Once a month Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No	Molly Magid
31812	How close is your home to industrial properties? Across the road (or equivalent) Do you have or use a driveway that has industrial property on it? No If any, what type of industrial activity has effects on your residential property? Freight yards, heavy machinery sales, bitumen plant, cement plant, heavy traffic movements 24/7 If any, what challenges does your home face relating to neighbouring industrial property? Noise; Vibration; Other (please specify): Heavy Vehicle Movements 24/7 How frequently are you impacted? Every day/night What time of day does it occur? Early mornings (3-7am); During the day (7am-5pm); Evening (5-10pm); Night (10pm-3am) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat	Kieran Brewster

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ID	Feedback	Name
	Is there anything else we should know or options we should consider when managing the industrial interface? The severe heavy traffic impact on the residential interface of Branston Street (northern end) could be very easily mitigated by placing a heavy vehicle restriction on Amyes Road, which would remove the option for heavy vehicles not accessing existing industrial businesses at the southern end of Branston Street to use the northern end as a shortcut via Amyes Road back to Shands road. Access to and from existing use industrial activities can then be retained by using the southern end of Branston Street, onto Halswell Junction Road, and then onto Shands Road (indicated in green on the attachment) Amyes Road has in recent years had the reestablishment of Hornby South School on the ex-Branston Intermediate site, and several housing intensifications on medium density zoned properties, bringing more families and young people into the area. There is genuine concern that the heavy traffic using this intensified area as a thoroughfare presents an elevated risk profile to its residents. Restricting heavy vehicles from Amyes road will bring safety to the school area, and remove Branston Street as an option for a shortcut thoroughfare past residential zoned properties 24/7 interrupting sleep, and impacting enjoyment of private property.	
31817	How close is your home to industrial properties? Other (please specify): nothing to do with If any, what type of industrial activity has effects on your residential property? nothing to do with If any, what challenges does your home face relating to neighbouring industrial property? Other (please specify): nothing What time of day does it occur? Night (10pm-3am) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? no	Max Well
31838	How close is your home to industrial properties? Across the road (or equivalent) Do you have or use a driveway that has industrial property on it? No If any, what challenges does your home face relating to neighbouring industrial property? Noise; Vibration; Other (please specify): Heavy vehicle traffic 24/7 (that shakes the road and houses, and impacts on sleep and working from home) How frequently are you impacted? Every day/night What time of day does it occur? Early mornings (3-7am); During the day (7am-5pm); Evening (5-10pm); Night (10pm-3am) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat Is there anything else we should know or options we should consider when managing the industrial interface? Please could heavy vehicles be banned from using the residential end of Branston Street (near Amyes Road), and on Aymes Road itself. They use this end of the street as a shortcut, and it severely impacts on the residents. The heavy vehicles could quite easily use the other end of Branston Street (which connects to Halswell Junction Road). There is no need for them to use the residential end of Branston Street and Aymes Road. Also, Hornby South School has now been established on the old Branston Intermediate School site (on Aymes Road). Banning heavy vehicles from using this end of Branston Street and Aymes Road would also be safer for the schoolkids (many of whom walk home or to cars parked in the area - with heavy vehicles turning into traffic on Aymes Road right outside the school, this can be quite dangerous).	Rachael Hemmer

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ID	Feedback	Name
31856	How close is your home to industrial properties? Other (please specify): I live on Rutherford Street, which is a highway with heavy traffic and zoned industrial I think? If any, what type of industrial activity has effects on your residential property? container park along the Opawaho-Heathcote River. I was also affected by the scrap metal yard explosion opposite the Tannery in Garlands Rd If any, what challenges does your home face relating to neighbouring industrial property? Noise; Visual impact How frequently are you impacted? More specific (please specify): The heavy traffic on Rutherford Street is noisy, and exacerbates the dangers of getting in and out of our shared driveway. I am also impacted visually by the container park, though at a distance. Really feel for the people living closer to it What time of day does it occur? During the day (7am-5pm) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat Is there anything else we should know or options we should consider when managing the industrial interface? I walk frequently along the Opawaho-Heathcote Ferrymead loop. Portlink and other industrial activities along the river are intensifying and this is regrettable. I 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 I suppose can't be got rid of. I only 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. A note of thanks to the Council for the signs on the loop walk warning cyclists to share the path with pedestrians. Also for all the new native tree plantings along the river:)	Belinda Meares
31863	How close is your home to industrial properties? Shared boundary Do you have or use a driveway that has industrial property on it? No If any, what type of industrial activity has effects on your residential property? Industrial General, with multiple uses. If any, what challenges does your home face relating to neighbouring industrial property? Noise How frequently are you impacted? More specific (please specify): 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 What time of day does it occur? During the day (7am-5pm); Evening (5-10pm); Early mornings (3-7am); Night (10pm-3am; More specific (please specify): 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. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat	Russell Fish

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ID	Feedback	Name
	Is there anything else we should know or options we should consider when managing the industrial interface? I fully support the proposed rules and believe in future these rules will assist to ensure the interface between residential and industrial zones is not so heavily weighted in favour of careless industrial users. It has always been my belief that sensible regulation and management of industrial zones will not require adjacent residential properties to act as a buffer zone. As far as possible, industrial outputs should be mitigated and managed within the confines of any industrial zone. An improvement to the rules would be that industrial users could pay for the mitigation to take place in the residential zone if this is a reasonable option. ie sound deadening material fitted to houses where this would adequately mitigate an unavoidable output. NB This submission should not be read as a complaint about the current activities adjacent to my home, which are generally safe and unobtrusive. Prior to this the IG was used at times by tenants who made no attempt, and despite personal approaches, had no intention to follow even the relatively lax restrictions placed on industrial zones at the time. When I bought my house, the current industrial area was future residential, but being occupied by NZPO. After them it became a 24/7 container storage and transport yard, then a bus depot with checks and repairs taking place 24/7. These should not be allowed next to a residential zone, without adequate physical barriers and technology to mitigate extremely irritating loud noise, and diesel fumes.	
31881	How close is your home to industrial properties? Further away If any, what type of industrial activity has effects on your residential property? ongoing, early morning delivery of waste skips and containers; previously, loud radio at weekends and night from Gym ; vibration from heavy trucks If any, what challenges does your home face relating to neighbouring industrial property? Noise; Vibration How frequently are you impacted? More specific (please specify): vibration, daily ; noise, once or twice per week What time of day does it occur? More specific (please specify): 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) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes Is there anything else we should know or options we should consider when managing the industrial interface? Industries should still be restricted in noise (or other nuisance) levels, regardless of length of their tenure. The rules should be clearly available for businesses and residents. Industry is often required to supply #X of car parking on site for clients or deliveries, but nothing for staff. This means staff park their cars in front of nearby dwellings, which have insufficient off-street parking for their occupants because of higher density. Having said that, 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. Historically, Addington and Sydenham had many businesses which employed people who lived locally (and walked or biked to work). With the increase in housing density in Addington, many of its residents travel across town to get to work, often using private vehicles. Sydenham is mainly industry, so is busy during the week and close to deserted during evenings and weekends.	Graham Robinson
31882	How close is your home to industrial properties? Across the road (or equivalent) Do you have or use a driveway that has industrial property on it? No If any, what type of industrial activity has effects on your residential property? mechanical noises and sounds from containers being dropped. If any, what challenges does your home face relating to neighbouring industrial property? Noise; Visual impact; Dust; Odour; Vibration How frequently are you impacted?	Brendan McCutchan

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ID	Feedback	Name
	Every day/night What time of day does it occur? During the day (7am-5pm); Evening (5-10pm) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure Is there anything else we should know or options we should consider when managing the industrial interface?	
32137	How close is your home to industrial properties? Across the road (or equivalent) Do you have or use a driveway that has industrial property on it? No If any, what type of industrial activity has effects on your residential property? Junk yard If any, what challenges does your home face relating to neighbouring industrial property? Visual impact How frequently are you impacted? Every day/night Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure Is there anything else we should know or options we should consider when managing the industrial interface? There is a yard full of rusty metal and other junk on the corner of Lane and McRae Street, directly opposite my house. The entire left side of McRae Street property is owned by the same man. It's a total eyesore. All I have ever wanted is for it to be a legal requirement that this eyesore be hidden by a fence	Karyn Taylor
32229	How close is your home to industrial properties? Further away If any, what type of industrial activity has effects on your residential property? Container yard If any, what challenges does your home face relating to neighbouring industrial property? Noise; Visual impact How frequently are you impacted? Every day/night What time of day does it occur? During the day (7am-5pm); Early mornings (3-7am); Evening (5-10pm) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat Is there anything else we should know or options we should consider when managing the industrial interface? It's really good to see this happening; it will reduce the impact to residents from industrial activities, and avoid developers or operators of industrial sites needing to deal with as many community complaints. However, I am concerned it does not go far enough to protect residents from the impacts of industrial activities.	Ben Dodgshun

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ID	Feedback	Name
	I agree with the definitions of heavy industrial activities and the requirement for container yards, although am concerned with them being a restricted discretionary activity that it would still be relatively easy to gain consent for this, and ask that this be tightened up. 200 m is still close enough for a lot of noise effects to be felt, it would be good for this to be a greater distance. A key point I would make is that the requirements and matters of discretion relating to noise (16.7.1.11), specifically special audible characteristics, need to apply at all hours as the noise described impacts on residents' enjoyment of their homes and wellbeing at all hours. From my experience, 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. These include those across open space areas, rivers, or otherwise having limited separation.	
32246	How close is your home to industrial properties? Further away If any, what type of industrial activity has effects on your residential property? Container yard If any, what challenges does your home face relating to neighbouring industrial property? Noise; Visual impact; Dust; Vibration How frequently are you impacted? Every day/night What time of day does it occur? During the day (7am-5pm) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure Is there anything else we should know or options we should consider when managing the industrial interface? Id say we are more than 200m away from the container yard. Clanging and banging all day long from early hours (id say 6am) takes away all the tranquility of living in a cul de sac its like constant roadworks with macines beeping. Our french doors rattle continuously is my house safe from all this movement? Our cars are constantly covered in dust and our lungs ..we cough more nose blocked etc may as well be vack to eq days with the silt. As for the metal yards bloody eye sore and bring down an area that used to be improving now houses are rented to gangs and no hoppers.	Anna Barber
32247	How close is your home to industrial properties? Across the road (or equivalent) Do you have or use a driveway that has industrial property on it? No If any, what type of industrial activity has effects on your residential property? Scrap metal yard If any, what challenges does your home face relating to neighbouring industrial property? Noise; Visual impact; Dust; Vibration How frequently are you impacted? More specific (please specify): More than once a week, but intermittently What time of day does it occur? Early mornings (3-7am); During the day (7am-5pm); Evening (5-10pm); Night (10pm-3am) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure	

Feedback received on the Plan Change 20, May 2025

ID	Feedback	Name
	Is there anything else we should know or options we should consider when managing the industrial interface? Since being woken up for the 89th time over the last year and countless complaints to noise control and the council I feel it is imperative for something to be done. I am feeling positive that metal yards and industrial areas are finally getting some more clarification in the district plan, so that this doesn’t happen to others, however there are a few things that need further improvement. For starters, within the draft it states “over the road” which could be construed in many ways and needs clarification and more specificity especially to protect those who reside there. The noise levels seem to increase especially during nighttime hours when there is no background noise to drown it out, so this should realistically be a further distance than “over the road” as well as needing to be a more defined distance. The Ruru lawn cemetery in Bromley is between our property and the industrial area on Maces Road, so I am not sure whether this would be considered “over the road” within the new rules, if not it should be. Our experience with noise control has been less than satisfactory with numerous complaints and what feels like not much follow up. We have been given weird excuses for the noise, stating they are one-offs which is not the case and even just stating no noise was being made when we have been stood outside listening during the time stated. Our confidence levels with the work quality of noise control and also the fact that they have no power even if they find noise is extremely low. If we have rules in place there should be procedures and consequences when they are broken. The inconsistent nature of these noises are meaning that they are difficult to catch and measure. During the night we are working with times varying from 10pm through to the early hours, consisting of periods from a single bang to up to an hour of moving metal with heavy machinery. This means someone needs to be available to check whenever it happens, the environmental officer is doing a great job and my dealings with them have been fantastic but they aren’t available 24/7, so maybe 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. More consistent procedures need to be in place as well as when they are caught - what are the consequences - when speaking to staff and council members there are issues with consistent measurement and anyone knowing what the consequences of breaking these noise levels and rules actually are. We have lived in this home for over 10 years, however we have had to deal with this over the last 6 years since the noises started being excessive. We have been woken up countless times throughout the night by loud noises, some of which are so loud they shake our home. Probably 90 % of the time the noise made is by one company called Annex Metals. The mental health affects of this have been enormous on all our whanau. Not only do we have to deal with noise throughout night, day time can be quite noisy as well, with our children having to listen to the noise throughout the day at school too. Enjoying our garden and watching our children play has become non-existent, our space is no longer enjoyable. As a home owner who pays rates, we shouldn't have to move to get away from these noises, the rules should be followed, yet they are not. These rule changes will be good going forward for when new businesses are established but what about the residents who are still suffering in our city, where already established businesses are not following the rules you have put in place, and these are not being upheld. It is quite clear that there is an ongoing issue with companies in the industrial areas who are clearly not following the rules, so its about time the council clamped down on them. Whether it be new businesses or ones that are already established. Thank you for you time in reading this. ██████████	
32248	How close is your home to industrial properties? Other (please specify): There is a strip of residential housing on industrial land on Radley st If any, what challenges does your home face relating to neighbouring industrial property? Noise; Visual impact; Dust; Odour; Vibration How frequently are you impacted? Every day/night What time of day does it occur? During the day (7am-5pm) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? This strip of land bordering Radley st was used as working men's homes while they worked for the industry on there back boundary. I think that the land should be rezoned residential and the problem would go away.	peter harrison
32310	Is there anything else we should know or options we should consider when managing the industrial interface? I am an individual with interests in the Industrial G zone.	Graeme Kerr

Feedback received on the Plan Change 20, May 2025

ID	Feedback	Name
	I do not support Council's PC20 plan change in its current form and I'd like that to noted. The information provided by Council outlines the issues that it seeks to deal with in respect of the interface between residential and industrial properties. The activities are; 1. Scrap metal/storage crushing activities 2. Metal recycling and dumping yards 3. Storage and movement of containers at depots near residential areas I acknowledge 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. These 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. It is my opinion that Council's proposed PC20 oversteps in many areas and ways; 4. It impinges on the existing property rights of industrial property owners with its major focus on residential owners 5. If approved it will financially impact many industrial property owners negatively and in some cases could cause significant financial loss 6. 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. A cost to the local economy. 7. Its scope seems disproportionate to the issues it sets out to deal with. For example; a. Why restrict "Ancillary retail" within in the industrial zones to only products produced or processed on site and not stored goods. b. Requiring a 200m setback for container yards and heavy industrial seems excessive. These are different types of activity and should be dealt with separately. c. 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 8. 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. 9. It is hardly helpful to the local economy. Thank you for the opportunity to outline my thoughts and concerns.	
33252	How close is your home to industrial properties? Shared boundary Do you have or use a driveway that has industrial property on it? No If any, what type of industrial activity has effects on your residential property? None, the factory over the back fence has never caused us any issues. It's more the proposed changes to restrict residential development on our and our neighbours' properties that is of concern to us. Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Yes Is there anything else we should know or options we should consider when managing the industrial interface? We are concerned that the proposed changes will put far greater restrictions on us and our residential neighbours, in terms of what we will be allowed to do on our own residential properties. Please see the attachment for our submission, as it was easier to explain things with the help of pictures and maps.	Anne Heins
33297	How close is your home to industrial properties? Shared boundary Do you have or use a driveway that has industrial property on it? No	Jennifer Jones

Feedback received on the Plan Change 20, May 2025

ID	Feedback	Name
	If any, what type of industrial activity has effects on your residential property? car park If any, what challenges does your home face relating to neighbouring industrial property? Noise; Visual impact; Vibration How frequently are you impacted? Every day/night What time of day does it occur? Night (10pm-3am; Early mornings (3-7am) Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? No Is there anything else we should know or options we should consider when managing the industrial interface? A property owner located on a main public transport arterial route, who is being affected by an industrial business operating next door, should have the option to rezone their land to a commercial or high-density residential zone. An example of this situation can be seen in the houses located between St Joseph’s Primary School and the Papanui Pak’nSave. The noise and lack of privacy are so severe that, 90% of the time, these homeowners isn't able to enjoy any outdoor space on their section of land anyway. If the owners of these properties had the option to develop their land into commercial businesses or convert them into apartment-style housing, many would likely choose to do so.	
36533	How close is your home to industrial properties? Shared boundary If any, what type of industrial activity has effects on your residential property? National Steel Car Yard, Port-Link Industrial Park, Increase in heavy vehicles on highway 74A- Rutherford Street and beyond If any, what challenges does your home face relating to neighbouring industrial property? Noise Visual impact, Dust, Odour, Other (please specify): Increased heavy vehicle volume on Rutherford Street Garlands Road , Vibration How frequently are you impacted? Every day/night What time of day does it occur? Early mornings (3-7am) During the day (7am-5pm) Evening (5-10pm) Night (10pm-3am Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Somewhat Is there anything else we should know or options we should consider when managing the industrial interface? 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. The industrial/residential interface of the Woolston area needs urgent attention and positive action to mitigate the continuing social and environmental degradation of this wonderful area. There has been significant residential development in Woolston which is ongoing. This has made balancing the residential/industrial interface more	Clare Clayden

Feedback received on the Plan Change 20, May 2025

ID	Feedback	Name
	pertinent and urgent. Developers and developments need to consider the wider social and environmental implications of this increase in residential activity e.g. roading, parking, landscaping, schooling, social amenities, public transport, etc. 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.	
36535	How close is your home to industrial properties? Across the road (or equivalent) If any, what type of industrial activity has effects on your residential property? Warehousing, factory, logistics If any, what challenges does your home face relating to neighbouring industrial property? Noise, Odour, Vibration How frequently are you impacted? Every day/night What time of day does it occur? Early mornings (3-7am) During the day (7am-5pm) Evening (5-10pm)Night (10pm-3am Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure	Damien Rillstone
36536	How close is your home to industrial properties? Across the road (or equivalent) If any, what type of industrial activity has effects on your residential property? Warehousing & factory If any, what challenges does your home face relating to neighbouring industrial property? Noise, Odour, Vibration How frequently are you impacted? Every day/night What time of day does it occur? Early mornings (3-7am) During the day (7am-5pm) Evening (5-10pm)Night (10pm-3am Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure	Tamzen Rillstone
36537	How close is your home to industrial properties? Across the road (or equivalent) Across the road (or equivalent) If any, what type of industrial activity has effects on your residential property? Warehousing & factory If any, what challenges does your home face relating to neighbouring industrial property? Noise, Vibration How frequently are you impacted?	Katie Simpson

Feedback received on the Plan Change 20, May 2025

ID	Feedback	Name
	Every day/night What time of day does it occur? Early mornings (3-7am), Night (10pm-3am Do you think that the District Plan Change will assist in managing any issues at the industrial / residential interface? Don't know/not sure	

Supporting Submission on Plan Change 20 (PC20)

From: Mark – Motel X (69 Whiteleigh Avenue, Addington, Christchurch)

Date: 26/02/2025

To: Christchurch City Council

1. Introduction

Motel X is a planned **privacy-focused accommodation and wellness facility** at **69 Whiteleigh Avenue, Addington**. The site is **currently operating as a self-storage facility** but is being redeveloped into a **low-impact, secure, and discreet business catering to accommodation and wellness services**.

Plan Change 20 (PC20) is of **particular relevance** to this project, given its focus on managing the **industrial-residential interface**. While we **support the general intent** of PC20, we want to ensure that **low-impact commercial accommodation businesses like Motel X** are not inadvertently restricted under new zoning rules.

Further details on the project are available at info.motelx.nz.

2. Key Considerations for Motel X and PC20

A. Zoning Challenges and Needed Clarifications

- The site is **currently zoned Industrial General**, requiring additional resource consents to allow for **accommodation and wellness services**.
- **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.

B. Noise, Access, and Operational Restrictions

- While **Motel X is already designed to minimize impact**, new restrictions under PC20 could **unintentionally create compliance challenges** for businesses like ours.
- **Examples of potential concerns include:**
 - **Stricter noise limits** – already addressed in our design, but additional compliance costs could arise.
 - **Changes to permitted activities** – could create **barriers to future expansion or diversification**.

- **Traffic and access rules** – ensuring that regulations **balance industrial vehicle movements with guest-focused businesses** like Motel X is critical.

C. Benefits of Allowing Low-Impact Accommodation in Industrial Zones

- **Unlike traditional industrial businesses, Motel X operates with privacy, discretion, and minimal disruption** to surrounding areas.
 - The project includes **soundproofing, controlled access, and restricted on-site parking**, reducing its footprint and impact.
 - Recognizing **accommodation and wellness businesses as permitted or discretionary activities** in industrial zones **would support economic diversity without compromising residential amenity**.
-

3. Recommended Considerations for PC20

We encourage the Christchurch City Council to:

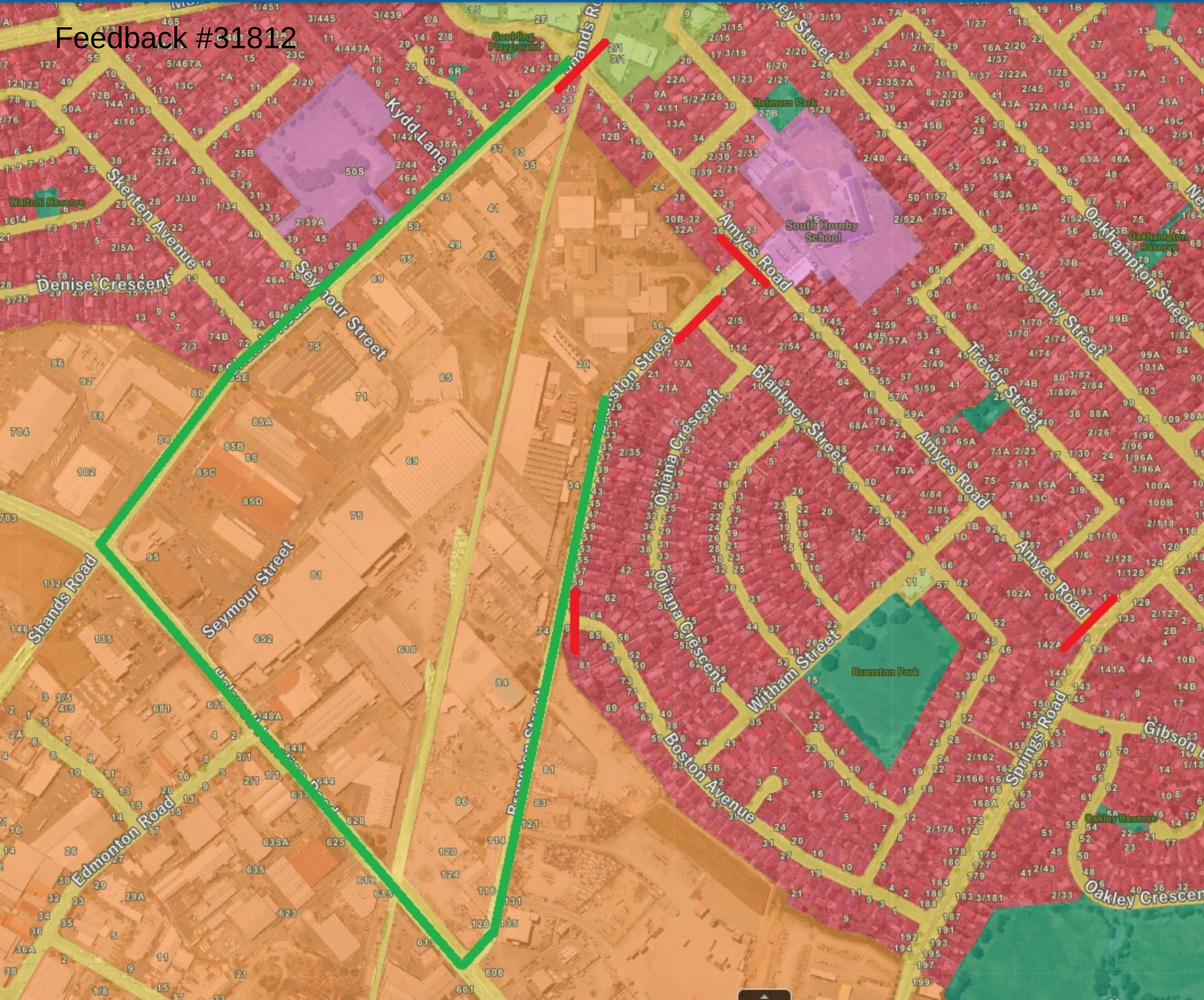
- ✓ **Ensure PC20 does not impose unnecessary restrictions** on low-impact commercial accommodation businesses operating in industrial zones.
 - ✓ **Differentiate between heavy industrial operations and mixed-use commercial businesses** when applying new rules.
 - ✓ **Allow flexibility in noise and operational standards** for non-industrial businesses that do not generate significant disruptions.
 - ✓ **Recognize that well-managed accommodation and wellness facilities can enhance the area's economic viability** without creating residential conflicts.
-

4. Conclusion

Motel X is committed to **operating responsibly, maintaining a positive relationship with the community, and contributing to Christchurch's economic landscape**. While we support **efforts to improve the industrial-residential interface**, we urge the council to ensure that **new regulations do not unintentionally restrict well-managed, low-impact businesses**.

For further details on Motel X, please visit info.motelx.nz or contact me directly.

Feedback #31812



Feedback on Christchurch City Council – Draft Plan Change 20

To: Christchurch City Council

Feedback from: Fire and Emergency New Zealand

This feedback is made on behalf of Fire and Emergency New Zealand (Fire and Emergency) to Christchurch City Council (CCC) on Draft Plan Change 20

Fire and Emergency's feedback is:

Draft Plan Change 20 to the Christchurch City Plan includes several proposed changes to the objectives, policies and rules relating to, but not limited to, distances between industrial and residential activities, measurement of noise, landscaping requirements, outdoor storage and buildings heights. Of interest to Fire and Emergency is:

- Amendments proposed to the existing firefighting water supply built form standards across the three industrial zones, and
- The changes to the provisions of the Industrial General Zone given Lyttleton Volunteer Fire Station is located within this zone and adjacent to the Medium Density Residential Zone.

Fire and Emergency have previously provided comment to CCC with respect to the revised wording of the firefighting water supply built form standards across the three industrial zones.

There are existing provisions in the industrial chapters of the operative Christchurch City Plan which require the provision of water supply and access in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008) in reticulated areas. As part of draft Plan Change 20, these provisions have been amended to reflect that where a reticulated water supply compliant with SNZ PAS 4509:2008 is not available, an alternative firefighting water supply shall be provided in accordance with SNZ PAS 4509:2008. The need for an applicant to obtain the written approval of Fire and Emergency has also been removed.

The draft changes are considered an improvement as the amended wording acknowledges the inherent flexibility in SNZ PAS 4509:2008 and provides greater flexibility for acceptable alternative solutions. It enables developers, in consultation with Fire and Emergency, to agree to and implement an alternative firefighting water supply solution based on a risk based approach. The inclusion of an advice note requiring consultation with Fire and Emergency in order to ascertain compliance with SNZ PAS:4509:2008 is also supported.

In addition to the above, Lyttleton Fire Station is located in the Industrial General Zone and adjacent to a residential zone. The draft plan change provisions therefore apply to the site. There are no other fire stations located within Industrial zoned land adjacent to Residential zones however, consideration has been given to future Fire and Emergency development within industrial zones and incorporated in the feedback below.

Draft rules 16.4.2.10 (Industrial General), 16.5.2.9 (Industrial Heavy) and 16.6.2.9 (Industrial Park), propose standards for industrial sites next to, or over the road from, residential zones, and include that a maximum of 60 heavy vehicle trips per day and no operation of heavy vehicles or machinery outdoors between 10pm and 7am as permitted activities. If activities cannot comply with this, then a resource consent for a restricted discretionary activity will be required.

Section 10 of the Resource Management Act provides for existing use rights where the use was lawfully established before a rule became operative or the proposed plan was notified, and the effects of the use are the same or similar in character, intensity, and scale to those which existed before the rule became operative or the proposed plan was notified. The application of Section 10 can vary, and due to the need for fire

stations to be as resilient as possible and therefore respond to change where necessary (which may include increased call outs or the need to expand the site), there is a risk that the need for resource consent, particularly in relation to heavy vehicle use may be required in future, given the fire station is a 24 hour operation.

Fire and Emergency seeks the following decision from the local authority:

Additions to rules are in **bold, underlined and in italics**.

Industrial General - Rule 16.4.2.10 Use of heavy vehicles and machinery adjoining residential zones

- a. For sites with a vehicle access adjoining any residential zone, the maximum number of vehicle trips for heavy vehicles using this vehicle access shall be 60 per day.*
- b. For sites adjoining a residential zone, there shall be no heavy vehicles or machinery operating outdoors between the hours of 2200 and 0700.*
- c. Any application arising from this rule shall not be publicly notified.*
- d. **This rule shall not apply to emergency service facilities.***

Industrial Heavy - Rule 16.5.2.9 Use of heavy vehicles and machinery adjoining residential zones

- a. For sites with a vehicle access adjoining any residential zone, the maximum number of vehicle trips for heavy vehicles using this vehicle access shall be 60 per day.*
- b. For sites adjoining a residential zone, there shall be no heavy vehicles or machinery operating outdoors between the hours of 2200 and 0700.*
- c. Any application arising from this rule shall not be publicly notified.*
- d. **This rule shall not apply to emergency service facilities***

Industrial Park - Rule 16.6.2.9 Use of heavy vehicles and machinery adjoining residential zones

- a. For sites with a vehicle crossing adjoining any residential zone, the maximum number of vehicle trips for heavy vehicles using this vehicle crossing shall be 60 per day.*
- b. For sites adjoining a residential zone, there shall be no heavy vehicles or machinery operating outdoors between the hours of 2200 and 0700.*
- c. Any application arising from this rule shall not be publicly notified.*
- d. **This rule shall not apply to emergency service facilities***

Rules 16.4.2.9, 16.5.2.7 and 16.6.2.8 are supported without recommended amendments.

Other provisions may unintentionally impact Fire and Emergency's ongoing operations, such as the outdoor storage and height provisions. Fire and Emergency would like to discuss the application of these amended provisions and the potential implications these may have on Fire and Emergency property with CCC.

Fire and Emergency would welcome further engagement on matters raised in the feedback within. Thank you for the opportunity to provide feedback.



Signature of person authorised to sign on behalf of Fire and Emergency

Date:	17/03/2025
Electronic address for service	Arlia.osullivan@beca.com
Telephone:	+64 3 374 3199
Postal address:	ANZ Centre Level 2/267 High Street, Christchurch Central City Christchurch, 8011
Contact person:	Arlia O'Sullivan

FEEDBACK ON THE DRAFT PLAN CHANGE 20 – INDUSTRIAL

Local authority: Christchurch City Council
PO Box 73012
Christchurch Central 8013

Attention: Hannah Ballantyne, Senior Engagement Advisor

Email: letstalk@ccc.govt.nz

Feedback on: Draft

Feedback of: bp Oil New Zealand Limited Mobil Oil New Zealand Limited
PO Box 99 873 PO Box 1709
Auckland 1149 Auckland 1140

Z Energy Limited
PO Box 2091
Wellington 6140

(Hereafter referred to as **the Fuel Companies**)

Address for service: SLR Consulting New Zealand
Level 2, 214 Collingwood St
Hamilton 3204

Attention: Miles Rowe

Phone: 027 276 2532
Email: miles.rowe@slrconsulting.com

Date: 17 March 2025

SLR Ref No.: Feedback of the Fuel Companies - CCC Draft PC20 Industrial

SLR Project No.: 810.031451.00001



INTRODUCTION

1. The Christchurch City Council (**the Council**) has opened feedback on a Draft Industrial Plan Change (**PC20**). This is the feedback of bp Oil New Zealand Limited, Mobil Oil New Zealand Limited and Z Energy Limited (**the Fuel Companies**) on PC20. The Fuel Companies receive, store and distribute refined petroleum products across New Zealand. In Christchurch City (**the City**), the Fuel Companies' core business relates to retail fuel outlets, including service stations and truck stops, and supply to commercial facilities and bulk fuel storage terminals.
2. The Fuel Companies' existing retail fuel activities include the storage and use of hazardous substances (typically petrol, diesel and LPG), the refuelling of vehicles, often other vehicle services (such as air pumps, car wash, etc.), and retail activities. Electric vehicle charging is also an increasingly common part of a modern service station.
3. Fuel deliveries are undertaken via tankers which occur infrequently but often without restriction in terms of frequency or times. All sites have established vehicle crossings for entry and exit, buildings and signage (which are often illuminated). Pump stations are located within forecourts (covered or uncovered) with associated lighting. Hours of operation vary and are not infrequently 24/7. The Fuel Companies' sites operate in accordance with Emergency Management Plans which detail procedures in case of emergency, including spills of hazardous substances.

SCOPE OF THIS FEEDBACK

4. This feedback relates to service station activities and truck stops¹. Across the City, service stations are located in a number of zones, including industrial zones affected by PC20. Many of the industrial-zoned service stations are located on major arterial road or state highways, which includes SH1, SH74 and SH76. In many cases, these major roads form the boundary between the industrial zones and the residential zones. As a result, service stations are directly impacted by the PC20 changes.
5. 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. It will be necessary that the Council undertakes a thorough s32 evaluation to ensure the PC20 provisions are the most appropriate way to address the issue and do not unnecessarily target activities that are suitable in the residential-industrial interface. The section below provides further commentary on the draft PC20 amendments of most relevance to service station activities.
6. While the City is home to bulk fuel storage terminals at Woolston and Lyttelton, these terminals are not directly impacted by PC20, and further comment does not need to be made in this regard.

DRAFT INDUSTRIAL RULE CHANGES

Reverse sensitivity

7. The Fuel Companies generally 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

¹ Note the definition of "service station" in the District Plan includes truck stops. In this feedback, reference to service stations means all service stations and truck stops, unless otherwise stated.



protecting established activities in the industrial zones from reverse sensitivity effects, including from residential development and intensification in the adjoining zone.

8. In the Fuel Companies opinion, PC20 addresses only the former and does not afford sufficient recognition and protection of established activities in the industrial zones, including any necessary upgrade or redevelopment to those activities. While the Fuel Companies 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.

Heavy vehicle trips

9. The Fuel Companies are particularly concerned with the new draft industrial zone standards 16.4.2.10 and 16.5.2.9 relating to the use of heavy vehicles and machinery adjoining residential zones. In summary, these standards apply to industrial sites next to, or over the road from, residential zones, and impose a maximum of 60 heavy vehicle trips per day and no operation of heavy vehicles or machinery outdoors between 10pm and 7am, otherwise it requires consent as a restricted discretionary activity with new assessment matters.
10. It is considered that service stations and truck stops will be disproportionately affected by these industrial zone standards due to the nature and location of service station activities, as well as many of these sites being across the road from residential zones. In addition, “heavy vehicles” but it is unclear what would constitute “machinery” under the draft standards.
11. Some service stations provide truck refuelling, while the sole purpose of truck stops is truck refuelling, and therefore, these sites have a high number of heavy vehicle trips per day as part of their normal operations that will exceed the draft heavy vehicle triggers. As noted in paragraph 4 above, 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. The Fuel Companies are of the view that 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. In fact, locating service stations so that they are not on the fringe of industrial zones and major roads will likely divert more vehicles (passenger, light commercial and heavy vehicles) onto local roads.
12. In addition, it was noted in paragraph 3 above that fuel deliveries are undertaken via tankers which occur infrequently but often without restriction in terms of frequency or times. These fuel deliveries may occur during the hours of 10pm and 7am, simply because of the lower volume of service station traffic at these times, and to reduce potential health and safety risks to the service stations users.
13. Most service stations across New Zealand are in urban areas, with many of these sites occurring at the interface with residential zones. The Fuel Companies consider that 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.²
14. The result of PC20 in its current form is that many service stations (including truck stops) will need to seek a resource consent for what is otherwise a permitted activity in

² Again, this takes into account that service stations are not specifically industrial activities in the District Plan but are generally compatible with industrial activities.



the industrial zones. Alternatively, PC20 may push service stations into other zones, some of which may be less desirable for service stations and truck stops than the industrial zones. The Fuel Companies 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.

CONCLUSION

15. Thank you for your time and acknowledgement of the issues raised in the feedback of the Fuel Companies. Please do not hesitate to contact the author should you wish to discuss or clarify any matters addressed herein.

Signed on behalf of bp Oil New Zealand Limited, Mobil Oil New Zealand Limited and Z Energy Limited



Miles Rowe

Team Leader Hamilton - Planning

SLR Consulting New Zealand Limited



14 March 2025

Health New Zealand
Te Whatu Ora

Christchurch City Council
58 Hereford Street
Christchurch 8013

Delivered by email: letstalk@ccc.govt.nz
Cc: brittany.ratka@ccc.govt.nz

Attention: Hannah Ballantyne – Senior Engagement Advisor

Tēnā koe Ms Ballantyne,

Health New Zealand Feedback – Draft Plan Change 20: Industrial Plan Change

On 24 February 2025, Christchurch City Council (CCC) wrote to Health New Zealand | Te Whatu Ora (Health NZ) advising of Plan Change 20 Industrial Plan Change (PC 20) in relation to 21 and 27 Sylvan Street, Addington (the sites).

CCC proposes to notify PC 20 in May 2025, and is seeking feedback on the draft provisions by 17 March 2025 (via letstalk.ccc.govt.nz/PC20).

This letter is Health NZ's feedback on PC 20.

Background:

1. On 7 March 2025 Health NZ officials¹ met with CCC officers² to discuss PC 20 in relation to Sylvan Street properties and the wider 'rolling' District Plan review programme. The key discussion points / information from that meeting are summarised below:
 - a. Health NZ and CCC desire to work together
 - b. CCC confirmed that the draft status of PC 20 is the ideal time to provide feedback on the provisions – including site zoning
 - c. Health NZ confirmed that 21 and 27 Sylvan Street, Addington are:
 - i. part of the Hillmorton Hospital campus. They are central portion of a south-eastern contiguous Health NZ landholding – just east of the Hillmorton Hospital site (bound by Linden Grove Ave and Sylvan Street to the north-east; Lincoln Road in the south; and Annex Road and John Campbell Crescent to the west and north-west)
 - ii. currently, as well previously / will continue to, provide clinical and non-clinical hospital activity, and access thereto
 - iii. zoned Industrial General in the operative District Plan

¹ Paulette Sorensen – Group Manager Land and Helen Hamilton – Principal Planner

² Hannah Ballantyne – Senior Engagement Advisor; Brittany Ratka – PC 20 Planning Lead and Sarah Oliver – Team Leader, Policy

- iv. proposed to retain this zoning in PC 20
- d. Health NZ confirmed that 51 Sylvan Street, Addington is also:
 - i. part of the south-eastern portion of the Hillmorton Hospital campus (adjoining / providing access to / from 21 Sylvan Street)
 - ii. currently, as well previously / will continue to, provide clinical and non-clinical hospital activity, and access thereto
 - iii. zoned Residential Suburban in the operative District Plan
- e. CCC would consider further the ability for feedback on PC 20 to address the zoning of contiguous Health NZ landholdings that are and will continue to be Hillmorton Hospital campus sites (in the case of 51 Sylvan Street, Addington)
- f. Health NZ confirmed it has started a planning review of its Christchurch landholdings, and this work will partly inform feedback on PC20 and future plan changes
- g. CCC would confirm with Health NZ the programme timeframes for an upcoming 'rezoning' plan change – which may be more appropriate to deal with the residentially zoned site at 51 Sylvan Street (and any other anomalously zoned Health NZ sites)

Feedback and Relief Sought:

- 2. Health NZ seeks the following relief as part of the notified version of PC 20:

Property	Relief Sought	Key Reasons
21 Sylvan Street, Addington	Rezone the site from Industrial General to Specific Purpose Hospital Zone	This is part of the Hillmorton Hospital Campus The site is and will continue to be utilised to deliver clinical and non-clinical hospital activity, and access thereto The appropriate zoning to reflect existing and ongoing land-use is the SPHZ
27 Sylvan Street, Addington	Rezone the site from Industrial General to Specific Purpose Hospital Zone	
51 Sylvan Street, Addington (Parcel of land on the corner of Sylvan	Include in PC 20, the rezoning of the site from Residential Suburban to Specific Purpose Hospital Zone	This is part of the Hillmorton Hospital Campus The site is and will continue to be utilised to deliver clinical and non-clinical hospital activity, and access thereto The appropriate zoning to reflect existing and ongoing land-use is the SPHZ

Street and Linden Grove Ave)		It is appropriate to include the rezoning of this parcel of land SPHZ in PC 20 as it forms part of the south-eastern contiguous Health NZ landholding – just east of the Hillmorton Hospital site. To exclude the rationalisation of the underlying zoning from the adjoining Sylvan Street parcels only continues the existing inappropriate operative District Plan zoning that does not reflect site use and built form. Further, the existence of hospital activity onsite is readily visible and likely to be well understood by the community.
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Table 1: Health NZ PC 20 Relief Sought

3. For the avoidance of doubt, Health NZ acknowledges that the review of the SPHZ provisions will be addressed in a later phase of CCC's rolling District Plan review. Health NZ will seek early engagement on that matter separately to this PC 20 feedback.
4. For completeness, Health NZ identifies that elsewhere in Christchurch there are other hospital and health services sites that are incorrectly and anomalously zoned. Health NZ will seek to address these in other correspondence and plan change processes.

Conclusion:

The successful function of the New Zealand Health System is nationally and regionally significant to all New Zealanders and their whānau and family. Health sector infrastructure involves the agile arrangement of services and facilities across a network of sites. Accordingly, it is critical that infrastructure is recognised for its significance, prioritised as a critical function and enabled to operate without unreasonable impediments.

The sites at 21, 27 and 51 Sylvan Street, Addington are part of the Hillmorton Hospital Campus. They are incorrectly zoned by the Operative District Plan. It is critical that they are zoned appropriately as Specific Purpose Hospital Zone as part of PC 20 – this will directly enable the continued delivery of New Zealand Health System services to New Zealanders. PC 20 is the appropriate part of the District Plan review to address the existing District Plan zoning anomalies at these sites.

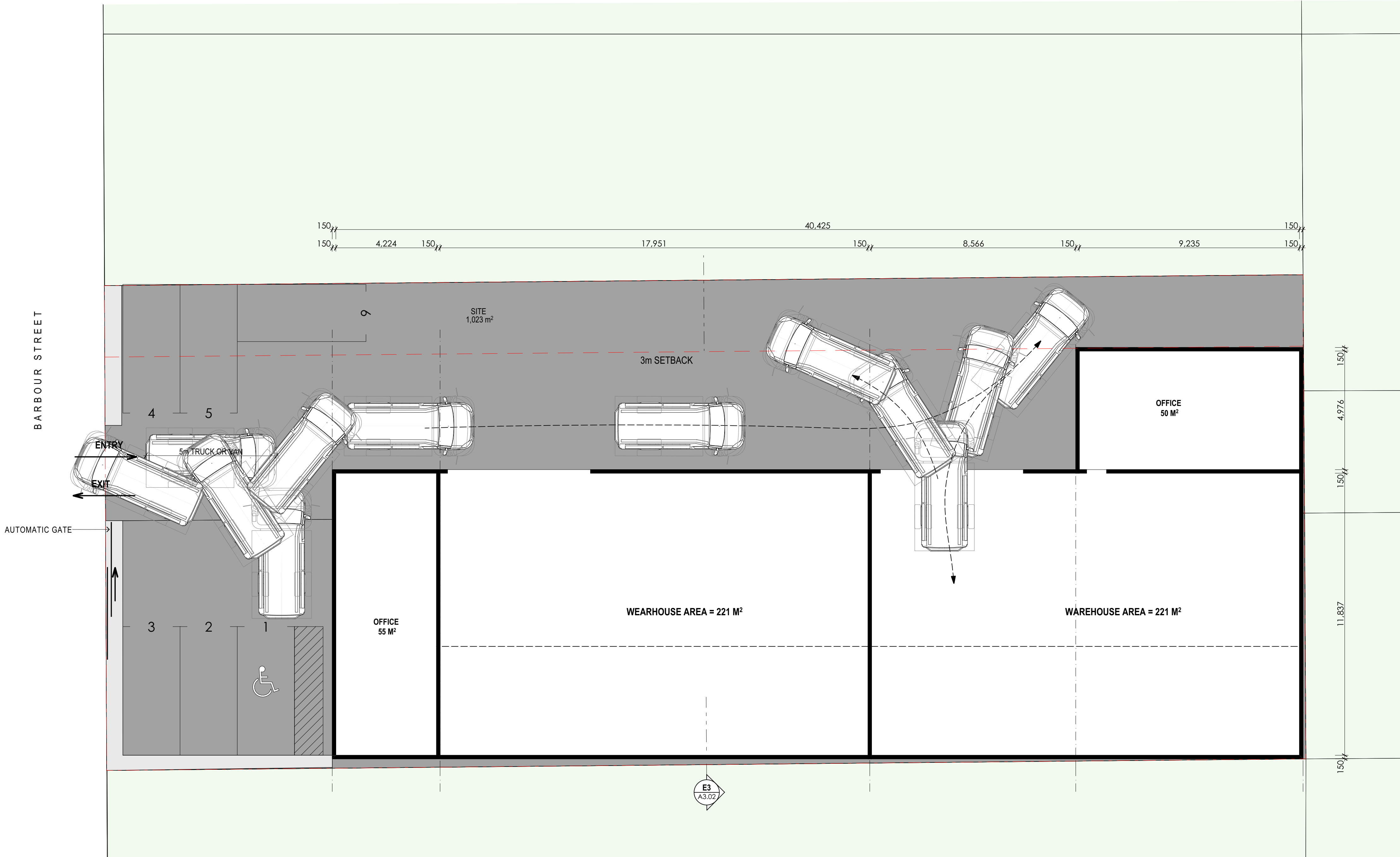
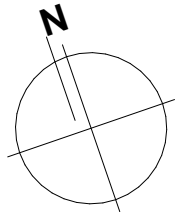
Health NZ would be pleased to discuss our feedback further and, if necessary, provide additional information to assist CCC in its development of PC 20. Please direct all enquiries to the undersigned or Helen Hamilton at planning@tewhatauora.govt.nz.

Ngā mihi/Yours sincerely,



Paulette Sorensen

**Group Manager Land
Infrastructure and Investment**



PROJECT: 20-22 BARBOUR ST		
CLIENT:		
TITLE: PLAN: SITE		
CONCEPT ISSUE		
SHEET NO:		A0.02
REVISION A - WIP	ISSUE DATE Work in Progress	DESCRIPTION Not in Transmittal Set
Work in Progress		
PROJECT NO:	REVISION ID:	A - WIP
DESIGNED BY: JW	SCALE:	1:100 @A1
DRAFTED BY: EK	PRINT DATE:	17/03/2025
W		

Plan change 20 initial feedback submitted 28 March 2025.

Draft Plan Change 20 seeks to impose further controls on the activities and effects of industrial zoned land. These comments relate specifically to the long established use of an industrial zoned Property consisting of 13 land parcels located between 30 Garlands Road and 124 Marshall Street, Woolston. The Property is used predominantly for the recycling of scrap metal. This is an essential activity world wide and within New Zealand that conserves the world's resources. National Steel has been operating on this site since Feb 2017. The recycling operation operates within District Plan rules and Existing Use Rights.

It is very important to understand that the Woolston area has seen industrial activity since 1856 when the first tannery opened up, Woolston was Christchurch's first industrial area and residential development has been built around it, in it, and close to it, all at the approval of council. The Woolston industrial area was established very early in the development of Christchurch with established industries in rubber, shoe polish, gelatine, wool scouring, and glue. More recently, the proximity to the Lyttelton port has resulted in shipping container storage. The surrounding residential areas of Woolston provided working class housing for the strong job centre provided by the early established industries. Unfortunately, the long established industries are increasingly affected by complaints by newly established residents and increasing residential intensification of the Woolston area. It is considered that the Council has not fully considered the present economic contribution of the Woolston industrial base to the immediate Woolston community and to Christchurch overall in seeking to impose additional controls through Plan Change 20. This is also the case with respect to the ability for residential intensification under the present District Plan zoning in the immediate vicinity of the Woolston industrial land. In summary, the Council needs to be fully cognisant of the economic contribution of the Woolston industrial base and provide safeguards to ensure that those established industries operating within the law are protected from unnecessary reverse sensitivity issues. If the Council continues to reduce the ability of industry to operate in this Woolston area through increasing the industrial rules, it will eventually force industry out of the area completely.

National Steel Limited, operating at the Property between 30 Garlands Road and 124 Marshall Street, has operated at this site since 2017. A review of the Christchurch District Plan zoning map shows that the whole of the site is zoned Industrial General zone. All of the Property is surrounded by other Industrial General Zoned land except for four Residential Suburban zoned properties which are located across the road (107 Marshall St, 109 Marshall St, 11 Marshall St, and 80 Cumnor Terrace). Almost all of the National Steel recycling operation is undertaken on the land fronting Garlands Road. The land located on 124 Marshall St is predominantly covered in buildings. The scrap metal recycling activity is a naturally unsightly activity. This is the nature of the activity and because it needs to be to be efficient. But it is also an essential industry located within an Industrial General Zone located on almost all sides by other Industrial zoned land. With respect to effects, noise limits at the National Steel site have been measured and are below the District Plan limits.

Since being woken up for the 89th time over the last year and countless complaints to noise control and the council I feel it is imperative for something to be done. I am feeling positive that metal yards and industrial areas are finally getting some more clarification in the district plan, so that this doesn't happen to others, however there are a few things that need further improvement. For a starter, within the draft it states 'over the road' which could be construed in many ways and needs clarification and more specificity especially to protect those who reside there. The noise levels seem to increase especially during nighttime hours when there is no background noise to drown it out, so this should realistically be a further distance than 'over the road' as well as needing to be a more defined distance. The Ruru lawn cemetery in Bromley is between our property and the industrial area on Maces Road, so I am not sure whether this would be considered 'over the road' within the new rules, if not it should be.

Our experience with noise control has been less than satisfactory with numerous complaints and what feels like not much follow up. We have been given weird excuses for the noise, stating they are one-offs which is not the case and even just stating no noise was being made when we have been stood outside listening during the time stated. Our confidence levels with the work quality of noise control and also the fact that they have no power even if they find noise is extremely low. If we have rules in place there should be procedures and consequences when they are broken.

The inconsistent nature of these noises are meaning that they are difficult to catch and measure. During the night we are working with times varying from 10pm through to the early hours, consisting of periods from a single bang to up to an hour of moving metal with heavy machinery. This means someone needs to be available to check whenever it happens, the environmental officer is doing a great job and my dealings with them have been fantastic but they aren't available 24/7, so maybe 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. More consistent procedures need to be in place as well as when they are caught - what are the consequences - when speaking to staff and council members there are issues with consistent measurement and anyone knowing what the consequences of breaking these noise levels and rules actually are.

We have lived in this home for over 10 years, however we have had to deal with this over the last 6 years since the noises started being excessive. We have been woken up countless times throughout the night by loud noises, some of which are so loud they shake our home. Probably 90 % of the time the noise made is by one company called Annex Metals. The mental health affects of this have been enormous on all our whanau. Not only do we have to deal with noise throughout night, day time can be quite noisy as well, with our children having to listen to the noise throughout the day at school too. Enjoying our garden and watching our children play has become non-existent, our space is no longer enjoyable. As a home owner who pays rates, we shouldn't have to move to get away from these noises, the rules should be followed, yet they are not. These rule changes will be good going forward for when new businesses are established but what about the residents who are still suffering in our city, where already established businesses are not following the rules you have put in place, and these are not being upheld.

It is quite clear that there is an ongoing issue with companies in the industrial areas who are clearly not following the rules, so its about time the council clamped down on them. Whether it be new businesses or ones that are already established.

Thank you for you time in reading this.

[REDACTED]

Plan Change 20: Early consultation feedback

31 March 2025

Kia ora, and thank you for the opportunity to comment on the proposed changes.

We live at and own 119 Radley St, in the Industrial General zone, in a row of 7 residential properties, some owner-occupied, some rentals, on the east side of Radley St in the block between Marshall St to the north, and Garlands Road to the south (the residential properties are at 109, 111, 115, 117, 119, and 121 Radley St). The contiguous titles further south at 129, 131 and 133 Radley St are rumoured to be slated for demolition to make way for some kind of storage development.

While our homes on the east side of the block are zoned Industrial General, the properties across the road from us on the west side of Radley St are all zoned Residential Suburban.

The peculiarity of this situation where one side of the street is zoned Residential, and the other side zoned Industrial General stems, we assume, from its history. The Industrial land that backs onto many of our properties (115, 117, 119, 121 and 127 Radley St), and which is currently a plastic molding factory located at 96 Marshall St was formerly the Skelllerup rubber factory for many decades, and according to old-timer neighbours I've talked to, our homes were built around 90 years ago, in the 1930s, as houses for the factory workers.

A few shots of the streetview of the area in question are below, and we hope that you can see that we have a nice cluster of homes and that it is worth some consideration by Council as to how our residential amenity can be maintained as part of the process of PC20.



Figure 1: East side of Radley St (121, 119, 117 Radley St) – Zoned 'Industrial General'



Figure 2: East side of Radley St - Corner dairy, fish'n'chip shop, and mower shop, and 111 and 115 Radley St – Zoned 'Industrial General'



Figure 3: West side of Radley St (112, 114, 116 Radley etc) - Zoned 'Residential Suburban'

When we purchased our home at 119 Radley St in 2021, we were fully aware that there was a factory over our back fence, and that there would likely be some noises we'd have to accept as a natural and fair part of the deal. We have never actually had any issue with the factory. However, some of the changes proposed under PC20 make us fear that there will be far worse impacts on our residential property.

In particular, the new rule proposed for "*Non-complying activity status for residential, guest accommodation, education and healthcare activities within the Industrial General and Park zones*" could significantly and adversely impact on us and our residential neighbours.

Without being planners, we assume this could greatly restrict what we are able to do on our properties. It would also gravely affect our peaceful enjoyment of our properties if, for example, a storage site, car park, warehousing and distribution etc were to be built next door, with all the associated vehicle traffic etc, and the impact on the visual amenity and residential character of our row of homes - an outcome that is far more likely if redeveloping one of these properties as a residential dwelling, is made much more difficult under the proposed District Plan changes. We think having an Industrial-type activity next door will have a far greater impact on our peaceful enjoyment of our homes than having such activities over the back fence.

Also, is it correct to assume that this rule would make it more difficult to get an extension to our house consented, or other changes we might like to make to our home in future?

Not being planners, we don't know what the best approach is to addressing the balance between protecting the amenity of existing homes in an Industrial Zone, but we hope Planners can give some thought to this and take us into consideration as details of the Plan Change are developed. Would it be worth considering shifting the boundaries of the Suburban Residential zone across the road, to include our pod of homes (115 – 121 Radley St), for example?

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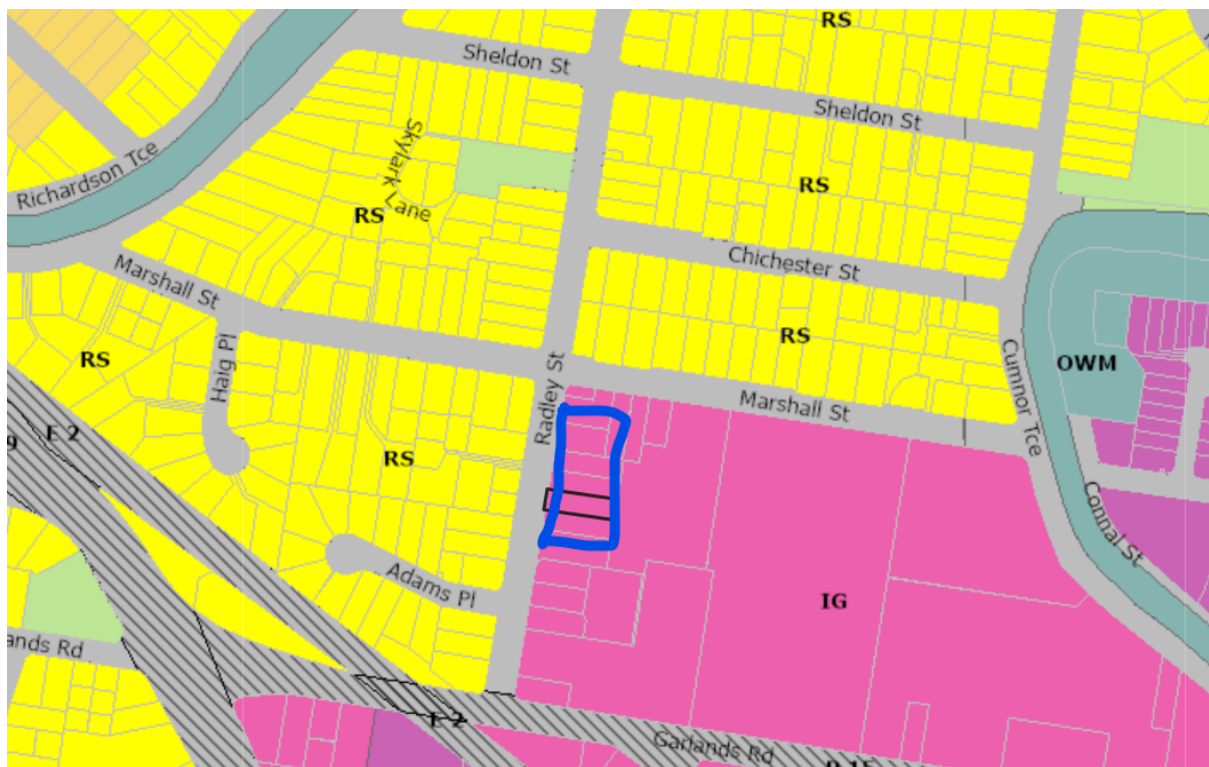


Figure 4: Blue mark-up showing the location of our cluster of homes, outliers in the Industrial General zone. Would it make more sense to rezone us Residential Suburban?

We imagine that our situation as a small group of residents in the Industrial General zone is quite an outlier city-wide, and would greatly appreciate our particular situation being taken into account as you develop the details of PC20, including consideration of whether it would make sense to change the zone boundaries between Industrial General and Residential Suburban to include us in the Suburban zone, or whether other overlays or details in the new rules could be considered to alleviate the impact of the overall changes on us as residents.

Many thanks for your time, and feel free to contact Anne if you have any questions.

Evaluation of options for land at 2¹, 18 and 20 Shakespeare Road and nos. 188-206 Waltham Road

Issue: The zoning and land use pattern for the north-western part of the residential neighbourhood bounded by Waltham, Brougham, Shakespeare and Wilsons Road North (part residential and part industrial) results in potential land use conflicts that need to be avoided or mitigated to protect residential amenity and limit reverse sensitivity constraints on lawfully established businesses.

Context: The land bounded by Waltham, Brougham, Shakespeare and Wilsons Road North is an almost fully intact residential neighbourhood, which unlike its neighbouring blocks to the north and west, has largely resisted land use change from residential to industrial use over the last 50 years. Only a handful of parcels in the NW corner are not in residential use, these being commercial in nature. This includes our client's land at nos. 2, 18 and 20 Shakespeare Road, in use as a car dealership (Hollands Suzuki), and adjoining properties fronting Waltham Road which include a fish and chip shop, dairy, video production service, coffeeshop, vape shop and a small auto repair business (vacant). All of the properties are zoned Industrial General (IG) except for the yard component of Hollands' car dealership, which is zoned Residential Medium Density (RMD).



Site Location Map

¹ Whilst in separate ownership, a consistent zoning should be applied to 2E Shakespeare Road for plan integrity reasons.

We understand that the residentially zoned land at 18-20 Shakespeare Road was historically a Ministry of Works depot (c1950's) but since the mid 1990's, has been owned and operated by Hollands, in association with their car dealership business². The car sales yard (defined as a 'trade supplier' or 'yard-based supplier' depending on the extent of forecourt space), has to date relied on existing use rights for its continued operation, noting the activity would otherwise require resource consent under the applicable RMD zoning.

The balance of the properties have been zoned industrial for many decades. Under the former City Plan, the corner sites were zoned Business 3B which was the Inner-City Industrial Buffer Zone, intended to be *"a transitional buffer between the mixed industrial activity areas in the inner city (B3 zone) and the medium density inner city areas"*. The zone anticipated small-scale light manufacturing, service and repair industry, warehousing and various community



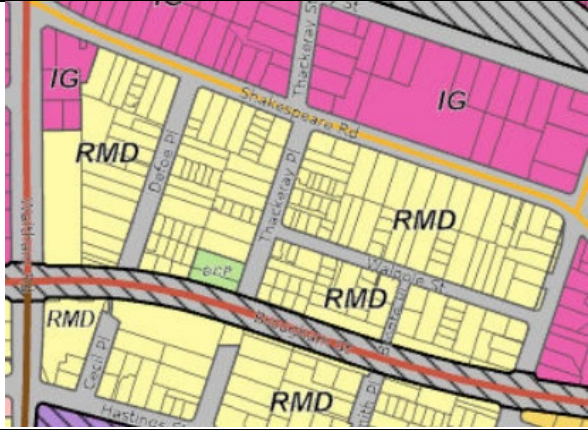
activities such as places of assembly. Some small-scale retail was permitted where it would not have significant adverse effects on the function and amenity of the central city and district centre. The performance standards sought to manage potential adverse effects in a way that *"reflected the proximity of business activities to a medium density living environment"*.

The last District Plan review in 2017 consolidated nine industrial zones into three; with the B3B zone becoming part of the Industrial General zone. In the process, it lost some of the nuance that existed under the previous plan to manage potential land use conflicts. The operative IG zone enables a wide range of industrial activities that are generally compatible with housing but if not managed appropriately, can cause adverse effects (including noise, light, fumes, visual amenity) on activities sensitive to industrial activity (including housing). To date, there have not been significant land use conflicts arising, in large part because the land uses are fairly benign and mostly commercial rather than industrial in nature. However, there is the potential for less compatible industrial activities to establish in the future, with the potential for adverse effects on established housing and in turn, for those permitted industrial activities to face pressure from residential neighbours to constrain their operations.

Given the specific site context and characteristics described above, we invite the Council to consider the option of rezoning the land to better reflect the current land uses and proactively manage potential land use conflicts, and in so doing, enable more efficient and appropriate use of the land.

To assist, we provide an evaluation of options for managing the actual and potential effects on the environment resulting from the current zoning and land use pattern consistent with the purpose of the Plan Change. It concludes that rezoning to Local Centre zone is the most appropriate method for achieving the purpose of the Plan Change and the objectives and policies of the Christchurch District Plan, in particular those that seek a well-integrated pattern of development and a high-quality urban environment where conflicts between incompatible activities are minimised.

² See **Appendix 1** for historical aerials showing the land use over time.

#	Evaluation of Options			
	Option 1 - Status Quo Zoning and Provisions of the Operative District Plan (ODP)	Option 2 – Status Quo Zoning (with proposed PC20 amendments) Council's Preferred Option	Option 3 – Rezone 'site' to Local Centre Zone	Option 4 – Rezone 'site' plus immediately adjoining IG zoned land to Local Centre Zone
				
	Costs - Actual and potential adverse effects on residential neighbours arising from industrial neighbours. - Potential for reverse sensitivity effects on permitted industrial activities from residential neighbours. - Opportunity cost from not providing for wider range of commercial activities that would	The appropriateness of this option is largely the same as outlined for Option 1 but with the potential to improve the industrial – residential interface over time through the imposition of new built form standards. However, these additional controls will not be triggered unless there is a land use change so there is a real risk that the provisions will be ineffective [noting that land use	Costs - Loss of small area of industrially zoned land. However, unchallenged evidence presented to PC14 demonstrated that there is more than sufficient industrial land in this part of the city relative to forecast demand such that this is not a material issue³. - Marketability / feasibility of land for commercial use and redevelopment involving sensitive activities like housing or healthcare would be diminished by the	Evaluation as per Option 3 except that: The potential for retail distribution impacts would be greater (as a larger site) but still not 'significant', noting also that many of the properties fronting Waltham Road are already in commercial use and the most likely uses to be attracted to this location are commercial services that are already enabled widely in non-centre zones and less likely to generate retail distribution effects. The benefits would be much greater in terms of:

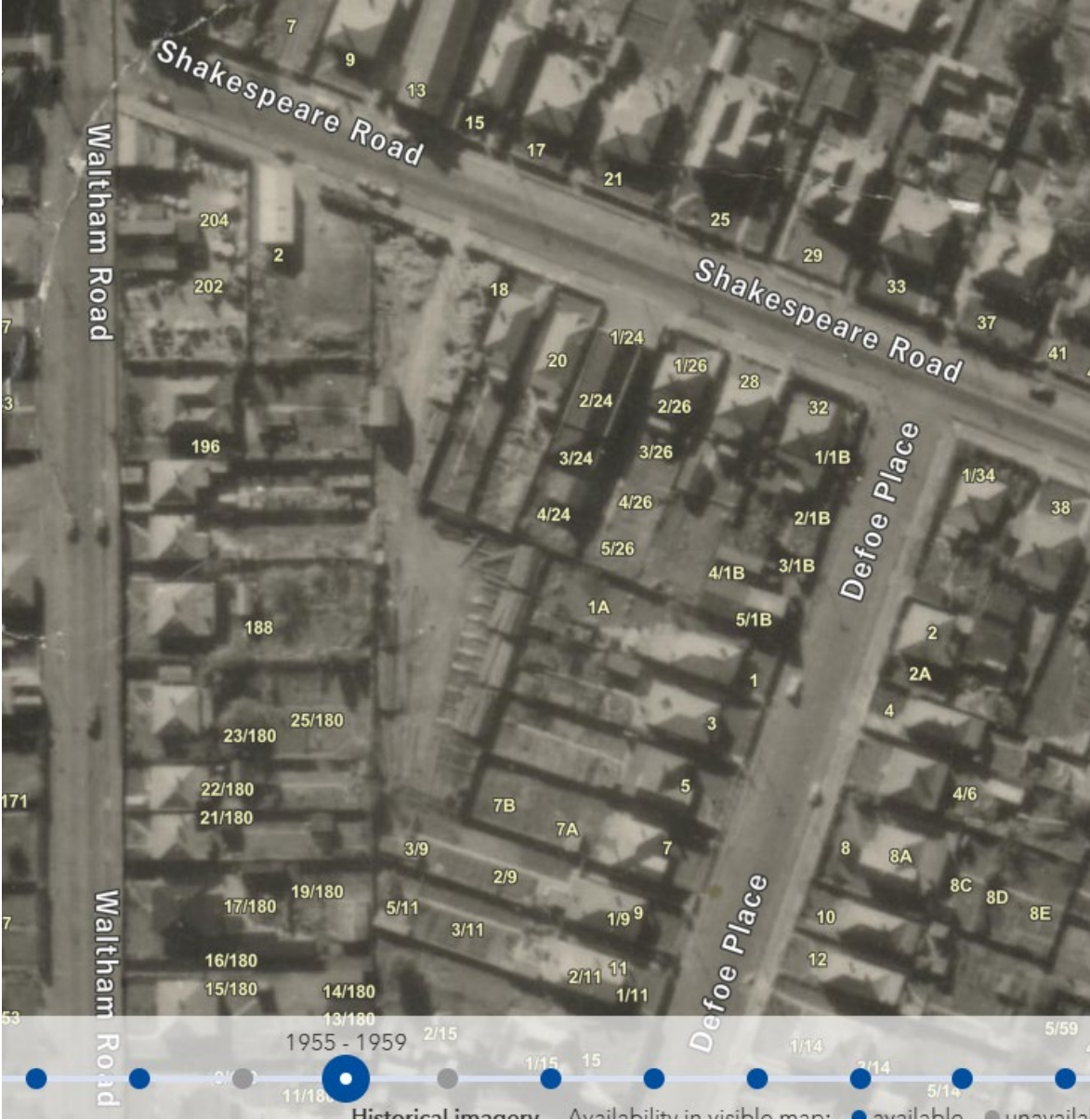
³ [Technical-Report_Central-City-Land-Demand-Capacity-Report-VERSION-1.PDF](#) see Table 4 page 11.

#	Evaluation of Options			
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	benefit property owners, local residents and workers. - The misalignment of zoning and land use imposes costs on landowners of nos 18-20 Shakespeare Road – triggering unnecessary consenting requirements (transaction costs) for works that are anticipated for the use but not necessary the zone. - RMD zoning disincentivises redevelopment which could otherwise provide improved outcomes in terms of land use efficiency and environmental improvement. - IG zoning limits opportunities to provide for a wider range of commercial activities that would benefit local residents. It is noted that there is a lack of local convenience shops and services in the area. - Site characteristics including land parcel size / dimensions and potential for land use conflicts is likely to negatively impact on the marketability of this land for	has not changed on the Hollands site for many decades]. Moreover, in this specific case, the car yard is located on residentially zoned land, so the industrial zone provisions do not apply / will be wholly ineffective.	presence of adjoining industrially zoned properties. - Potential for distributional effects on existing network of commercial centres. This is unlikely to be significant on the basis of: - The small land area; and - The distance from, and good health of, established centres. - Note that if there were any concerns about potential retail distribution effects, activity specific standards could be added to manage potential effects in the same way as has been done for Homebase in Shirley. Benefits - Industrial activities would not be permitted in the zone, improving land use compatibility with adjoining residential properties. - Any redevelopment would need to meet the built form standards for the LC zone which includes provisions for landscaping, tree planting along residential boundaries and within site parking areas. - Provides a consistent zoning for all parts of the car dealership land, providing more certainty for the landowner and enabling a wider range of potential uses including	- Enabling an improved design outcome for site redevelopment. - Improved redevelopment feasibility from larger site. - Commercial zoning on Waltham Road frontage improves access and visibility and therefore marketability and feasibility. Efficiency and Effectiveness Overall, this option is considered to be the most efficient, with the greatest overall benefits relative to costs. This option would be the most effective for achieving the objectives of the plan change and objectives and policies of the District Plan including: - Fostering investment certainty and reducing transaction costs (Obj. 3.3.1). - Managing conflicts between incompatible activities (Obj. 3.3.14) - Providing a well-integrated pattern of development and a high-quality urban environment (Obj. 3.3.7) - Providing for the economic and social needs of communities by enabling them to easily access goods and services in a

#	Evaluation of Options			
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	both industrial and residential uses. Benefits - None. Efficiency and Effectiveness The Council has identified that the status quo has not been effective for achieving plan objectives aimed at achieving high-quality urban environment where conflicts between incompatible activities are minimised, notably Strategic Objective 3.3.7 (Urban Growth, Form and Design) and 3.3.14 (Incompatible Activities). Nor has it been effective at managing the effects of Industrial Activities, consistent with Objective 16.4.3 as evidenced by the need for Plan Change 20. Specifically in terms of this land, we note that zoning and land use is not well aligned and is therefore not effective at achieving strategic Objective 3.3.14 which aims to		the existing use or redevelopment to provide commercial or mixed use. - Greater enablement of commercial uses could incentivise redevelopment with improved environmental outcomes and greater compatibility with residential uses. - Rezoning would support the provision of local shops and services of benefit to the surrounding residential catchment. The site is ideally situated for a local centre, located on an arterial route, with good access by all modes including by bus (2 routes) and cycle (dedicated cycleway on Waltham Road). Efficiency and Effectiveness Overall, Option 3 is considered to be more efficient than Options 1 and 2 on the basis that the benefits are greater than the costs. This option would better achieve the purpose of the plan change and would be more effective for meeting Objective 3.3.14 by rezoning to minimise conflicts between incompatible activities. It would better implement Objective 3.3.7 which seeks a well-integrated pattern of development and a high-quality urban environment and it would be consistent with objectives that	network of commercial centres (Objectives 15.2.2 and 3.3.10).

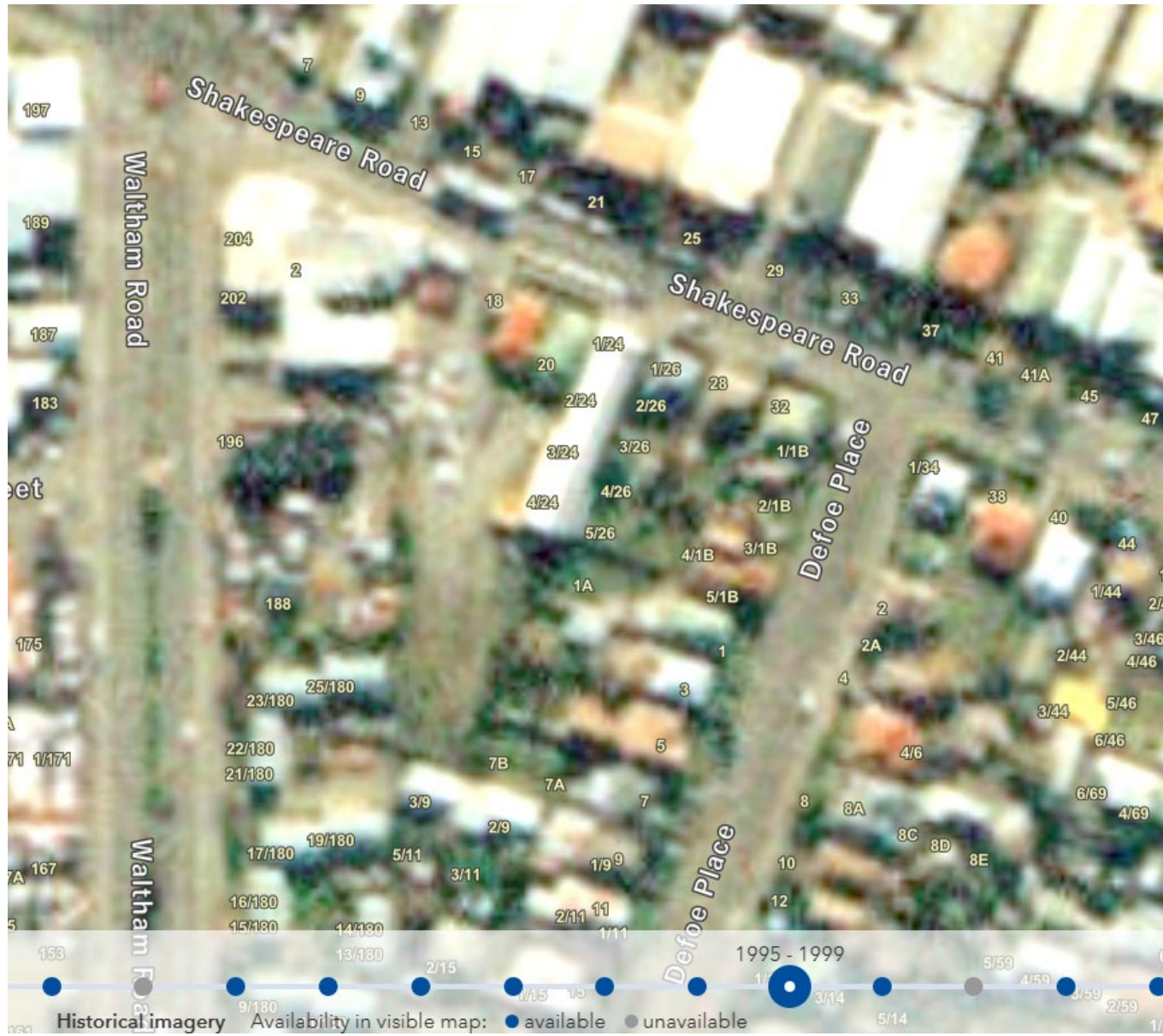
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	minimise land use conflicts, "primarily through zoning".		seek to focus commercial activity in a defined network of commercial centres.	
	Risk of acting or not acting Sufficient information exists about the proposed provisions without the need for take account of the risk of acting or not acting (RMA s32(4)(b)).			

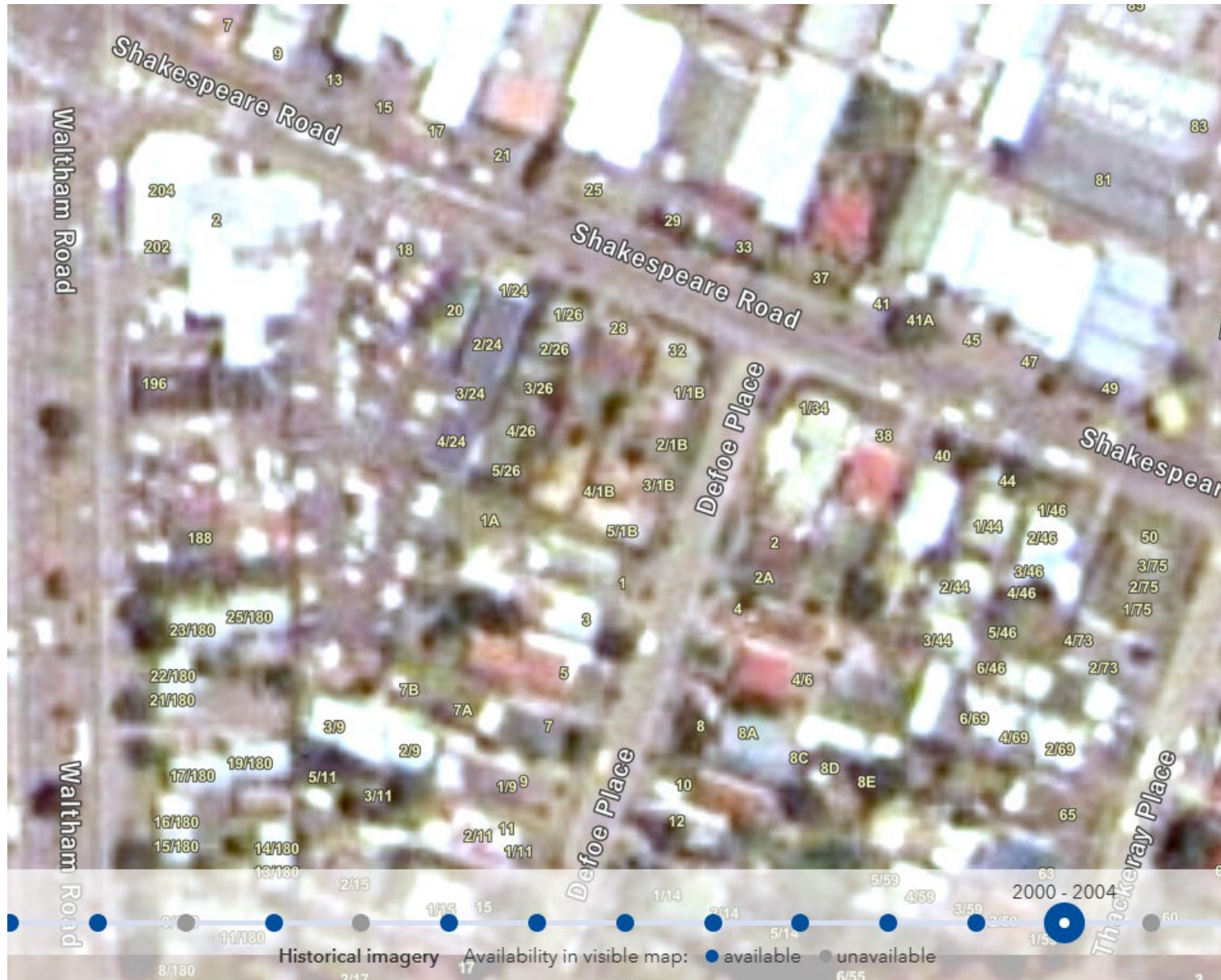
Attachment 1: Historical aerial photographs (source: Canterbury Maps)

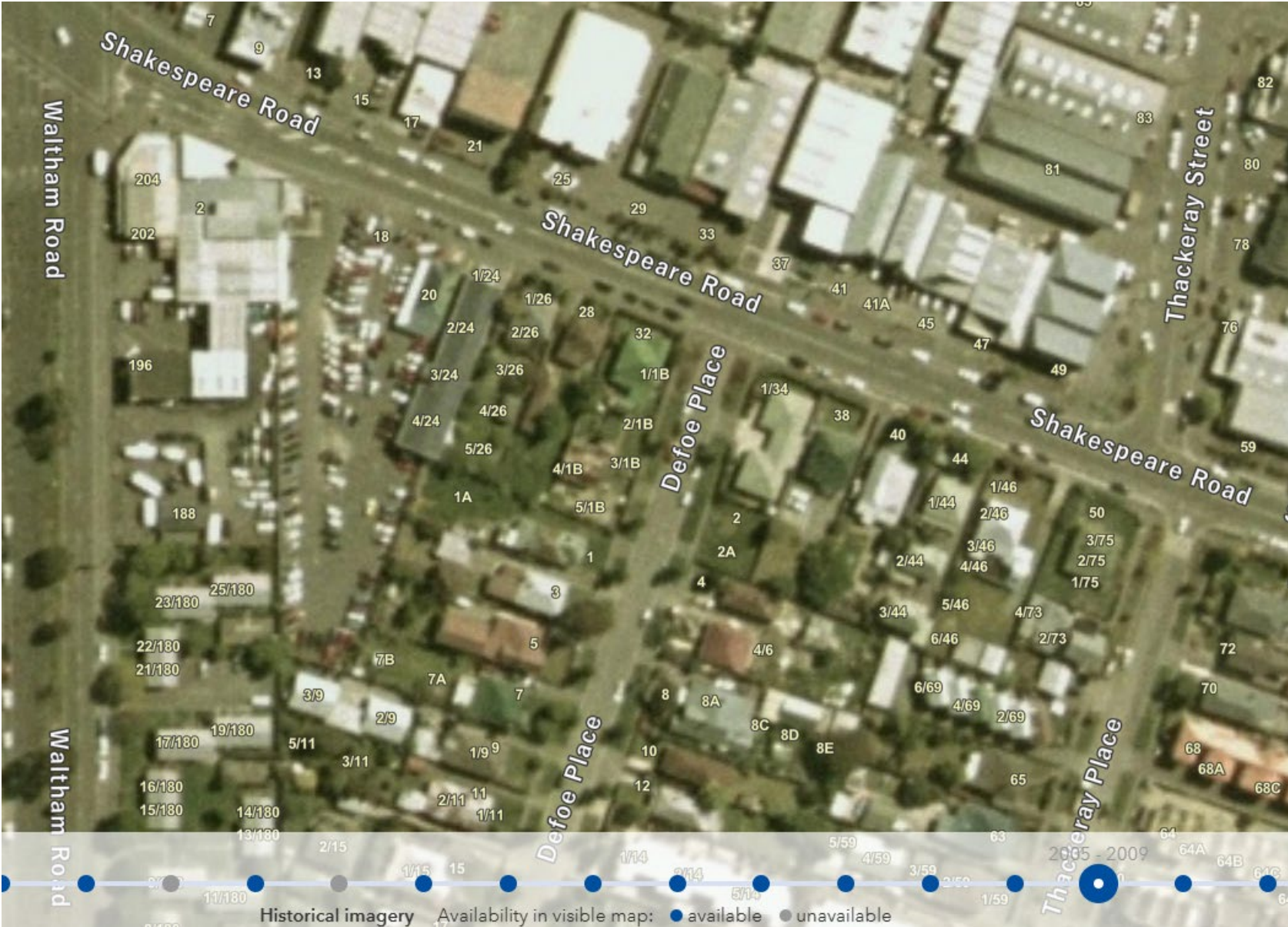


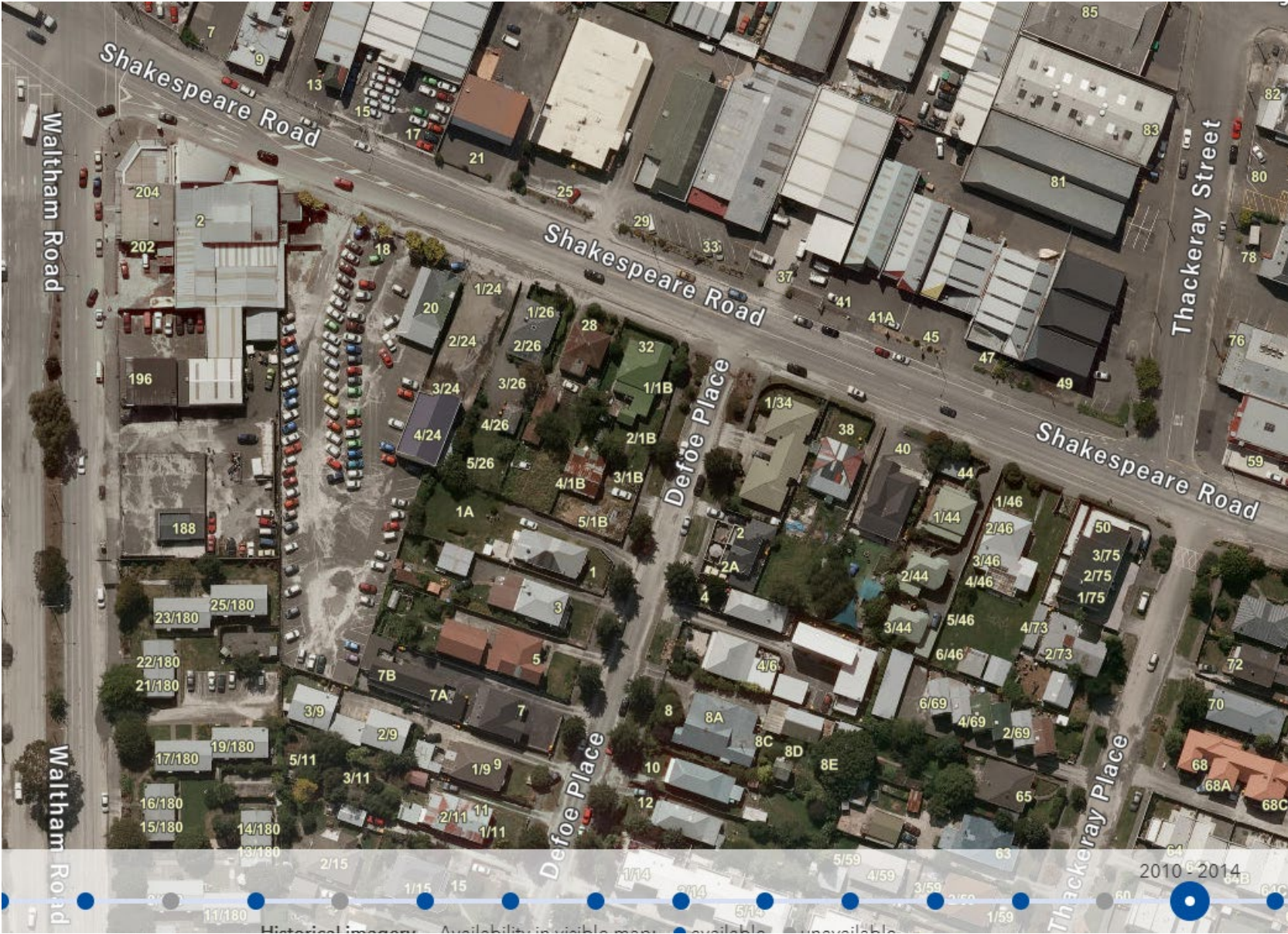


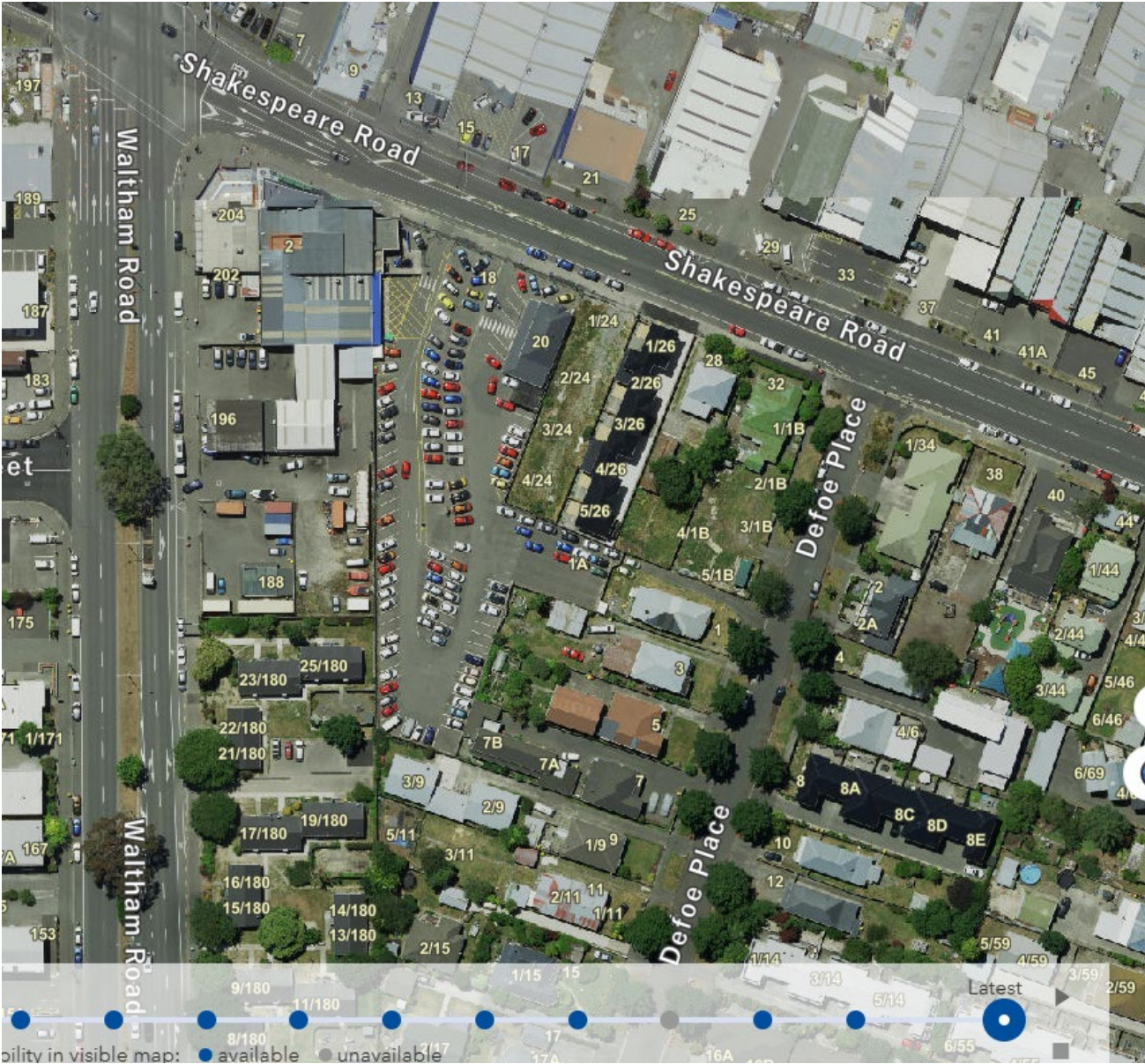














NZ Association of Metal Recyclers, Inc

PO Box 16 0020, Hornby, Christchurch 8441 P:(03) 344 3006 E: gm@nzamr.org.nz W: www.nzamr.org.nz

31 March 2025

Christchurch City Council

Dear Sir/Madam

Early Feedback to Plan Change 20

The NZ Association of Metal Recyclers, Incorporated is a not-for-profit industry association that has operated since 1968. Metal recycling is a major activity of the global circular economy, helping Christchurch and other communities in New Zealand to meet targets for recycling and reduction of landfill waste. Metals are unique because they are infinitely recyclable.

Our membership includes eight (8) Christchurch-based companies that provide essential metal recycling services to the Christchurch and greater Canterbury communities. The Christchurch City Council is a customer of our industry, as the Council directs metals from its EcoDepot network for professional recycling.

By their very nature, metal recycling operations are rightfully located in the Industrial zones of the city. We express concern and alarm that our industry has been singled out for a District Plan change and we question the information base being used to justify this course of action.

This feedback is largely informed by a meeting we had with Christchurch City Council officials Sarah Oliver, Brittany Ratka and Hannah Ballantyne on 10 March 2025, with some documentation sent to us after that meeting. The time taken in meeting with us and responding to our enquiries is appreciated.

We have a number of concerns.

A. The appropriateness of a Plan Change as the preferred solution

The Council has provided a map depicting industrial areas, buffer zones, and streets where there are 'frequent' noise complaints. The definition of 'frequent' has not been supplied. (map copy attached).

We requested additional details on these complaints, by named street to avoid disclosure of private details, to understand their nature and the outcomes of Council's investigations into each complaint. Our interest is to understand if Council found sufficient grounds to uphold each complaint and to take enforcement action for violations of current District Plan requirements.

This information was not supplied to us to help us make informed feedback. Ms Ballantyne replied, "*At this stage we are unable to collate and supply detailed complaints information.*" She did supply a Council memo from 2021 and two reports from Acoustic Engineering Services.

We note that 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. (emphasis added)

Our industry position is that, 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.

A plan change, once operative, will impact all metal recycling operations within Christchurch in perpetuity. We question whether a lack of Council enforcement is the issue. Our 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.

B. The rationale of progressing with Plan Change 20 when final decisions on Plan Change 14 have yet to be made

Included in PC14 is a qualifying matter called the 'Industrial Interface Qualifying Matter' (IIQM). It 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.

We 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.

C. Lack of clarity about how existing use rights will be respected

The Plan Change has been promoted on the Council website as "The District Plan (including this plan change) cannot place new requirements or conditions on existing industrial activities, including those with resource consent." However, on discussion with Council staff, 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.

We understood that the Council was to provide a Fact Sheet on Existing Uses, but this has yet to be made available, frustrating our ability to provide more specific feedback.

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.

D. Acoustic advice for PC 20 not available

We have been told that the acoustic advice to underpin Plan Change 20 is not available for disclosure at this time.

As an industry targeted by this plan change, we feel that the Council could be more transparent and give us the opportunity to review it in advance of any formal consultation process. The acoustic advice is likely to impact on the economic analysis needed for the Section 32 analysis and for our members to make informed submissions.

E. Practicality of requirements

Vehicle movements

PC 20 would limit businesses to 60 vehicle movements per day, which we understand to be counted based on access and egress i.e., only 30 vehicles per day using a site.

During peak processing times, such as when ships are at the Port of Lyttelton, this number of movements is too low.

Requirement to plant trees

Trees, as they mature, develop a canopy that will reduce the functional space of metal recycling facilities. In general, industrial sites wish to maximise the use of their properties and the value of that property is based on functional area.

In addition, many sites are improving management of stormwater runoff by sealing the ground surface with concrete. This allows better direction of stormwater runoff to interceptors and other stormwater treatment devices to achieve water quality standards. The Council holds resource consents from Environment Canterbury which state the quality standards that must be met.

Trees cannot be planted in concrete and those that are planted nearby will undermine the integrity of the sealed surfaces. We question the requirement to plant trees on industrial properties, noting again that this plan change targets our industry specifically.

Limits to outdoor storage

It is proposed that stockpiled material will be kept for no longer than 12 weeks. We questioned Council staff about how this clause would be interpreted.

Our 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.

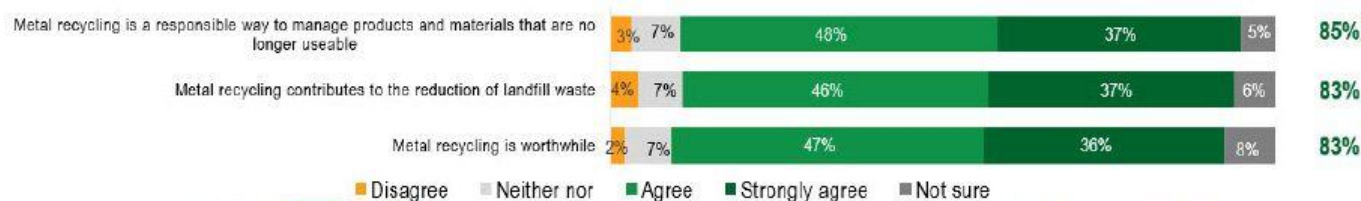
If the intention of PC 20 is for metal recycling sites to remove all stockpiles from view, our industry will need to be shut down resulting in loss of recycling capacity, destruction of viable businesses, and loss of jobs.

F. Future of metal recycling in Christchurch and economic impact

Metal recycling is valued by New Zealanders as evidenced by the public perception survey undertaken by us in 2024. There is a high level of recognition of the industry to manage products that are no longer useful and to reduce the amount of material going into landfill:

Feedback #32279

To what extent do you agree or disagree that ...



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.

We understand that Council must undertake a Section 32 analysis as part of a plan change. At this point of the consultation process, we are unable to provide more specific information about the cost implications of the proposed changes. Before our member companies would offer such information to Council, we will be encouraging them to seek legal advice to ensure that commercially sensitive details are withheld from public view.

If officials need to contact us to discuss this feedback, please refer any enquiries to our General Manager, Kathleen Crisley, at gm@nzamr.org.nz.

Kind regards,

Glen Jacobs
President

31-03-2025

Christchurch City Council

To Whom it May Concern

Early Feedback to Plan Change 20

Trillo Metals Ltd is a family owned and operated metals recycling business situated at 1B Landscape Lane, Middleton, Christchurch. Our family have been recycling metal for Canterbury since 1963. We provide an essential service to Canterbury, and the wider South Island, for the recycling of ferrous and non-ferrous metals, which allows for vast amounts of materials to be diverted from landfill.

We are keen to provide feedback on Plan Change 20 as we are concerned that metal recycling facilities have been repeatedly and unreasonably highlighted as the need for a District Plan change.

From the review of information that has been made publicly available to us via the Christchurch City Council(CCC) website, and through our industry body, The New Zealand Association of Metal Recyclers (AMR), we believe that metal recyclers have been unjustly singled out and we question the information that is being used to justify the proposed changes to the District Plan under Plan Change 20.

Our concerns are as follows:

1. The Justification for the Plan Change 20

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.

We would argue that to some degree, complaints from residential dwellings against commercial activities are inevitable, especially in areas where properties are near industrial zones. We believe it is important to note 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.

The council has cited 'frequent' complaints concerning noise, however, there has been little information supplied to detail if these complaints were upheld or not. 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. 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 we 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*** (bold type added).

Given this, we 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?

We 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.

2. The Appropriateness of Plan Change 20

Given the apparent lack of justification for Plan Change 20, we question whether Plan Change 20 is appropriate as a solution at all. Would better enforcement of CDP be a better first step? Additionally, shouldn't 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, like ours, 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*. Why does Plan Change 20 propose taking a backward step in this regard?

Our other concern regarding the appropriateness of Plan Change 20 is 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.

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.

Where is the onus on developers to build more suitable housing when creating residential living spaces near existing industrial zones? Page 20 of the Acoustic Engineering Services Limited 'Industrial Residential Interface -Review of Potential Noise Issues' report, recognised that '*...noise levels exceeding the District Plan limits.....because it had more direct line of sight to industrial activities.....could be a justification for requiring new intensified residential dwellings to provide some level of sound insulation or be set back.*'

Why then is Plan Change 20 seeking for businesses to do this instead? 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.

3. Lack of Clarity for Existing Business & Restriction on Growth

As an existing metals recycling business, we are concerned about the impacts that Plan Change 20 will have on our operations. How the new changes will be applied to existing businesses is unclear.

The CCC website notes the following:

'The District Plan (including this plan change) cannot place new requirements or conditions on existing industrial activities, including those with resource consent. The council can only monitor and enforce compliance of existing activities under the current rules and standards or against resource consent conditions.'

We have concerns about the interpretation of the words '*under the current rules and standards*' -if Plan Change 20 is passed, it technically becomes the 'current rule' and may therefore be applied to our existing business.

Additionally, when we met with the CCC as a member of AMR, during discussions we were told that *any change* made to our existing operation may trigger the requirements of Plan Change 20 -a comment that is highly concerning for us. What does 'any change' mean? Would upgrading a piece of plant or machinery qualify as a change?

As a vital Canterbury business, we would like to continue to grow our operations to enable us to employ more people and provide more services to our community, however there is no certainty for us to be able to do so, which is problematic for us and unfair to our employees and customers.

Reverse sensitivity issues need to be identified for what they are. 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 like ours 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 our communities.

4. Economic Impact

There are several requirements in Plan Change 20 that will negatively impact upon our business, these include:

- ***Vehicle Movements***

During our meeting with the CCC as an AMR member, we queried the restriction proposed by Plan Change 20 of just 60 heavy vehicle movements per day.

We had assumed a vehicle movement was one vehicle going in and out of the site and were astounded to learn that both the in and out travel was counted, meaning that only 30 heavy vehicles could visit the site per day. 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, by the nature of what they do, must use heavy vehicles to move their materials and goods. For many businesses the restriction in trade will be devastating and is likely to result in closure impacting staff, customers and communities. We question the legality of the ability to restrict business trade in such a manner.

As we are situated in an Industrial Heavy Zone, our site will not be subjected to the heavy vehicle restriction, however as we deal with and rely on services from other business (e.g., container parks) who are in areas where this requirement will be imposed, we will none-the-less be impacted by it.

As an exporter it is highly likely this will have a significant effect on our ability to bring our product to market, and therefore the economics of our business will be threatened.

- ***Use of Heavy Vehicles & Machinery***

Coupled with the restriction on heavy vehicle movements discussed above, 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. We 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.

- ***Outdoor storage of Materials***

Metal recycling requires the stockpiling of materials for processing. The volumes received in by our 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 we are unsure how this should be interpreted. Additionally, some of the materials we collect and process for recycling are low volume supply and need to be stockpiled for longer than 12 weeks to have the quantity necessary for export.

We are also affected by external factors outside of our control that require us 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 our communities. This fails to acknowledge the contribution our industries make to our communities and fails to support the growth of them.

- ***Landscape Requirements***

Our Christchurch location is approximately 1300m² -this would require us to plant 3 trees. As these trees grow, they will develop canopies that will restrict the operating space available to our business. Commercial industrial land is expensive to rent and to maintain, therefore we need to maximise its use to ensure an economic return to the business for these costs.

We are also concerned about impact this will have on our ability to meet with the conditions of our groundwater release as we are working towards developing a fully

covered site. Trees will require areas of our 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. As they grow trees will also have the potential to damage our sealed areas.

Numerous trees will also present a health and safety risk to our employees, many of whom suffer seasonal pollen allergies. Our site is also subjected to strong Canterbury winds, and we have 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 our 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 we educate our communities to recognise a productive mess from a hazardous one, and better that the 'mess' is contained in our yards where it can be responsibly recycled then for it to be spread across our riverways and landscapes.

Thank you for taking the time to consider our early feedback.

We will be looking to quantify our economic impact further in preparation for the 'Notification of Change' stage of this process.

File No.: 42340

31 March 2025

Christchurch City Council
PO Box 73012
CHRISTCHURCH 8013

Attention: Hannah Ballantyne (Senior Engagement Advisor)

Email: Hannah.Ballantyne@ccc.govt.nz

Dear Hannah,

RE: DRAFT PLAN CHANGE 20 EFFECT ON WATERLOO BUSINESS PARK

1.1 Executive Summary

- (a) Waterloo Business Park wishes to provide comment on the Draft Plan Change 20, which was advertised for comment between 24 February and 31 March 2025.
- (b) Some of the land on which Waterloo Business Park has been developed has a long-established history of industrial use, especially the Islington Freezing Works. Today, the relatively newly developed Waterloo Business Park is possibly the second (or third) largest industrial zoned area within the Christchurch City area. The vision of the Business Park was commenced in 2013 and is a quickly developing and significant Industrial area for Christchurch City.
- (c) Waterloo Business Park, therefore, has the potential to have a major positive benefit to the Christchurch economy. That economic and social contribution should not be underestimated. The draft Plan Change 20 is a DRAFT Plan Change which has no legal status at present. Therefore, the Council at this stage has the opportunity to change the Draft Plan Change without causing further costs to the Council (i.e. the Christchurch ratepayer), and to owners, and tenants, of industrial zoned land within the Business Park.

- (d) The vision of the Waterloo Business Park was developed on the basis of a Master Plan in 2013. Following further consenting and physical development, the Business Park is now being developed for varied industrial uses according to the Industrial General zoning. While some of the sites within the Waterloo Business Park are already developed and are being legally used for industrial purposes and therefore can be considered to have established Existing Use Rights, the Existing Use Rights do not apply should there be a change in the character, intensity, or scale, of the activity which is greater than that existing at the time of the Plan Change becoming operative. Furthermore, the majority of the sites are still vacant and being sold, and therefore, any proposed uses could be affected by provisions in draft Plan Change 20 when notified.
- (e) Effectively, the Plan Change 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, at present, legal within the provisions of the existing Christchurch District Plan.
- (f) Overall, the Plan Change imposes further restrictions on the type of activities, and the effects of those activities within sites zoned Industrial – especially Industrial General Zoned sites which abutt Residential or Rural zoned sites.
- (g) There are further increased restrictions on the following matters:
- Setback
 - Maximum height
 - Landscaping
 - Outdoor storage
 - Container yards
 - Retail activities
 - Heavy vehicle movements
 - Heavy industrial activities
- (h) In particular, Waterloo Business Park considers that the Plan Change is a “blunt” instrument that affects all industrial zoned land and strongly opposes all aspects of the Plan Change.
- i. It is considered 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.
 - ii. 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.
 - iii. It is unfortunate that the Council has taken this approach caused by a very few examples to impose even further restrictions on all Industrial zoned land.

- iv. 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
- (i) The majority of the sites within the Waterloo Business Park are undeveloped and not presently being used for Industrial Purposes. The imposition of 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. If, and only 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.
- (j) It is important to note that Draft Plan Change 20 has been prepared in response to some concern(s) and complaint(s) in relation to a metal recycling and dumping yard, and a shipping container depot. Overall, it must be noted that 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.
- (k) The alternative approach can be achieved by targeting the specific activities.

1.2 Present Zoning

The overall Waterloo Business Park “the Site” (Figure 1) has been subdivided into a range of different sized Industrial zoned lots, and are owned by multiple different owners. The Park is generally contained within Pound Road (to the north west) and Waterloo Road, and the southern railway line to the south, in Islington. The Waterloo Business Park is zoned Industrial General Zone in the Operative Christchurch District Plan. The site is triangular in shape with an approximate overall area of 120 hectares.



Figure 1: Locality Plan.

The Waterloo Business Park itself is zoned Industrial General Zone (shown in light pink in Figure 2). There are a variety of different zonings of land surrounding the overall Waterloo Business Park. To the east and northeast directly abutting the Business Park is Residential Suburban zoned land (yellow in Figure 2) developed into 16 fully developed low density residential lots across Brixton Street, and a further 14 fully developed residential sites which directly abutt the eastern boundary of the Waterloo Business Park. In effect there are 30 residential developed sites in direct proximity to the Waterloo Business Park.

To the north, the land is zoned Rural Urban Fringe Zone (Transpower New Zealand Limited). To the west of the Business Park, the land is zoned Rural Quarry or Zone; Open Space Community Parks (Templeton) Zone; and Rural Urban Fringe Zone. The boundary of the Business Park to the south is the railway line and additional Industrial General Zoned Land. Given the broad band of Industrial General Zoned land to the south of the railway line, and the additional Industrial General and Industrial Heavy Zoned land south of Main South Road, there is no concern of “buffer” issues to the south. However, the changes being proposed in the Draft Plan Change 20 will still affect some of the potential uses in that part of the Waterloo Business Park.

In summary, the Draft Plan Change 20 provisions will affect the potential use and development of all Waterloo Business Park sites regardless of their proximity to the adjacent non-industrial zoned land.

The basic fault with the Draft Plan Change 20 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. The Plan Change is unnecessary and is a “knee-jerk” reaction to a small number of specific complaints.

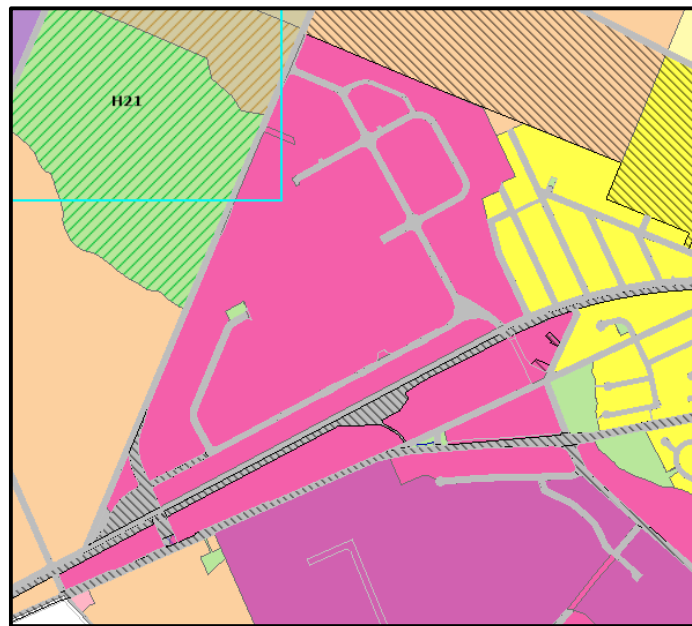


Figure 2: Zoning Map.

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.

1.3 Effect of Plan Change

(a) Definition of Heavy Industrial Activity

Ten additional “noxious” industries have been added to the definition of Heavy Industrial Activity. These should be deleted from the Proposed Plan Change when it is notified. Instead, effects of any activity should be based on the environmental effects of the activity at the boundary of the site.

(b) Height

The definition of “height” has been amended so that the height can be measured at any point in a site.

The maximum height of any building (including a shipping container) is 20 metres between 20 metres and 200 metres of a residential boundary. The height controls should be retained in the Industrial rules as they are at present. The change to the height controls is excessive given the increase in the distance from the non-industrial boundary from 20 metres to 200 metres.

(c) Setback

Setback controls (both distance and height) have become more restrictive; including outdoor storage of materials. Building setback rules, including building setbacks from road boundaries should be retained as they are at present.

(d) Landscaping

More landscaping controls will be required under the new provisions. The draft increased requirements are excessive and take no account of the effect on the owners and operators of the industrial properties. The landscaping rules within the Industrial Zones at present should be retained.

(e) Retail activities

Goods *simply stored* on a site can no longer be sold as a permitted activity. Only produced or processed. This 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.

(f) Heavy vehicles and machinery

The additional controls proposed to be imposed on heavy vehicles and machinery will involve significant restrictions on industrial sites and may make such sites unusable or much more difficult to operate. The present rules should be retained.

(g) Container Yards

Additional controls will be imposed on container storage within 200 metres of a residential zone. The present rules involve height restrictions but the draft rules involve a significant increase in the restrictions. The present height rules should be retained.

(h) Non-complying activities

Additional activities have been added as non-complying activities: health care; education; preschools; residential and guest accommodation. The status of these activities within an industrial zone is excessive. Present restrictions should be retained.

(i) Heavy Vehicles

A restriction of 60 heavy vehicles per day, and hours of operation (2200 - 0700) are proposed for sites with access abutting a residential site. Delete these proposed rules.

(j) Heavy Industrial Activities

Any heavy industrial activity proposed within 200 m of a residential zone boundary requires a resource consent. As stated above, the control of the activities within a distance of a non-industrial boundary should be based on their environmental effects rather than a “blanket” Outdated Town & Country Planning Act approach taken in the Draft Plan Change.

(k) Outdoor Storage of Materials

Additional controls (setback and height) are placed on the outdoor storage of materials on sites abutting residential zoned land. These are unnecessary given the already existing controls.

In summary, the Waterloo Business Park opposes the Draft Plan Change in its entirety on the basis that is unnecessary and creates further bureaucracy and cost. The Waterloo Business Park seeks that the Plan Change not be proceeded with further.

Please add the Waterloo Business Park to your list of affected parties and advise when the Plan Change 20 is notified for public submission.

Yours sincerely

DAVIS OGILVIE & PARTNERS LTD.



DAMIENNE DONALDSON

Principal Planner

BSc, PG Dip Res St, Assoc.NZPI

Email: damienne@do.nz

31 March 2025

Attn: Brittany Ratka
Christchurch City Council

Customer Services
P. 03 353 9007 or 0800 324 636

200 Tuam Street

PO Box 345
Christchurch 8140

www.ecan.govt.nz/contact

Tēnā koutou

Consultation: Plan Change 20 to Christchurch District Plan

Many thanks for the opportunity to provide feedback on these proposals. We support them in general and have made some recommendations around managing reverse sensitivity and providing for business activities. The following pages provide the details of this feedback.

Ngā mihi



Amanda Thompson

Team Lead, Plan Alignment
Environment Canterbury

Contact point for this feedback document:

Kate Williman

kate.williman@ecan.govt.nz

Our recommendations on the proposal

Our understanding of the proposal:

In response to concerns raised, the Council is considering whether to change what is currently permitted in industrial zones, specifically in areas adjoining residential zones. The District Plan has enabled some industrial activities to set up and operate near residential zones, resulting in effects including:

- reduced levels of amenity due to the scale, appearance, dominance and shadowing of buildings and outdoor storage, including from stockpiles and shipping containers;
- disturbance from industrial operations (noise and vibration effects); and
- exposure to things like odour, smoke and dust.

The current rules also enable more sensitive activities and retail not associated with industrial activities within the Industrial Heavy Zone. This has the potential to constrain the operations of industrial activities and lower the supply of industrial land.

The purpose of the plan change is to improve management of adverse effects of industrial activities on the environment, particularly the amenity of adjoining residential zones.

Proposal	Position	Explanation	Recommendation
Purpose of managing impacts of industrial activities on residential zones, including reduced levels of amenity, noise and vibration effects, and exposure to odour, smoke and dust	Support in principle	This purpose 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. It also aligns with CRPS direction to provide for quality living environments (objective 6.2.3(1)). In giving effect to this policy, we note that district plan provisions must also identify and provide for business land use needs (NPS-UD Policy 2, CRPS Objective 6.2.6). This includes: • Ensuring sufficient business land capacity (NPS-UD Policy 2), as identified on Map A (Objective 6.2.1) • 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)) • Encourage and provide for regeneration of brownfield areas (CRPS Policy 6.3.8)	We encourage CCC to ensure adequate assessment of the potential impacts of the proposal, in terms of the above objectives and policies, for business activities.

Proposal	Position	Explanation	Recommendation
Increased landscaping requirements for industrial sites	Support	This direction 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). This direction aligns with CRPS Policy 7.3.7 to manage impacts of development on freshwater quality through methods like low impact urban design and development principles, promoting freshwater quality objectives. We also note various direction in the CRPS to promote urban design that supports indigenous biodiversity outcomes.	Although the impact of the increased landscaping requirements is likely to be minor, we encourage CCC to engage with internal biodiversity expertise to identify any appropriate considerations when providing direction on vegetation cover requirements.
New restricted discretionary activity status for heavy industrial activities within 200m of residential zones, to manage air quality effects	Support in part	We support this proposal in principle as aligning with CRPS direction. CRPS Policy and Method 14.3.5 directs that territorial authorities set out district plan provisions that manage reverse sensitivity impacts of discharges to air by: • Ensuring that activities discharging contaminants to air are appropriately located. • Providing for protection of established activities from reverse sensitivity to discharges to air resulting from encroachment by sensitive land-uses, if the best practicable option is used to prevent or minimise any actual or likely adverse effects. However, we consider that 200m may not be enough of a setback to capture all activities that could have reverse sensitivity impacts because: • It may not capture all potential or perceived significant reverse sensitivity effects in terms of air quality • A larger setback may be better aligned with general direction in the Canterbury Air Regional Plan (CARP), which in places directs setbacks of 500m from sensitive activities. A 500m setback could 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.	Provisions for existing heavy industrial activities associated with discharges to air to use “best practicable option” in line with CRPS Method 14.3.5 Consider increasing the setback distance for new activities from 200m to 500m

Proposal	Position	Explanation	Recommendation
Industrial activities next to residential zones now permitted a maximum of 60 heavy vehicle trips per day, and no heavy vehicles or machinery outdoors 10pm – 7am. Or restricted discretionary with new assessment matters.	Support in principle	As above, the outcome sought aligns with CRPS policy 6.3.6(8). Will this provision significantly reduce the impacts of heavy vehicle traffic on adjacent residential zones? Much of the extent of Industrial zones indicated on the map appear to be adjacent to, and potentially mainly accessed by, arterial transport routes that may be carrying significant volumes of heavy vehicle traffic regardless of these provisions.	Assess whether the proposal is likely to deliver a significant benefit
New matters of discretion for industrial activities close to residential zones related to reverse sensitivity effects	Support	We support the inclusion of these new matters in general because, as noted above, this gives 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.	
Heavy industrial activity definition = 40kWhr (not 1000kg/hr of fuel burned), to align with Canterbury Air Regional Plan	Not supported	The units in these two Plans shouldn't be aligned in this way. The units used in the proposed District Plan rules should be appropriate to the outcomes sought by the proposed provisions, e.g. to manage adverse effects on amenity, including noise and vibrations. Meanwhile, the units in the Air Regional Plan are appropriate to managing adverse effects on air quality. Our 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.	Do not align the units in this way Consider whether it's appropriate to align the definitions of Heavy Industrial Activities between the CARP and District Plan

Proposal	Position	Explanation	Recommendation
New restricted discretionary activity status for heavy industrial activities within 200m of residential zones, to manage air quality effects	Support in part	We support this proposal in principle as aligning with CRPS direction. CRPS Policy and Method 14.3.5 directs that territorial authorities set out district plan provisions that manage reverse sensitivity impacts of discharges to air by: • Ensuring that activities discharging contaminants to air are appropriately located. • Providing for protection of established activities from reverse sensitivity to discharges to air resulting from encroachment by sensitive land-uses, if the best practicable option is used to prevent or minimise any actual or likely adverse effects. However, we consider that 200m may not be enough of a setback to capture all activities that could have reverse sensitivity impacts because: • It may not capture all potential or perceived significant reverse sensitivity effects in terms of air quality • A larger setback may be better aligned with general direction in the Canterbury Air Regional Plan (CARP), which in places directs setbacks of 500m from sensitive activities. A 500m setback could 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.	Provisions for existing heavy industrial activities associated with discharges to air to use “best practicable option” in line with CRPS Method 14.3.5 Consider increasing the setback distance for new activities from 200m to 500m
New matters of discretion for industrial activities close to residential zones related to reverse sensitivity effects	Support	We support the inclusion of these new matters in general because, as noted above, this gives 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.	

Proposal	Position	Explanation	Recommendation
Industrial activities next to residential zones now permitted a maximum of 60 heavy vehicle trips per day, and no heavy vehicles or machinery outdoors 10pm – 7am. Or restricted discretionary with new assessment matters.	Support in principle	As above, the outcome sought aligns with CRPS policy 6.3.6(8). Will this provision significantly reduce the impacts of heavy vehicle traffic on adjacent residential zones? Much of the extent of Industrial zones indicated on the map appear to be adjacent to, and potentially mainly accessed by, arterial transport routes that may be carrying significant volumes of heavy vehicle traffic regardless of these provisions.	Assess whether the proposal is likely to deliver a significant benefit
Heavy industrial activity definition = 40kWhr (not 1000kg/hr of fuel burned), to align with Canterbury Air Regional Plan	Not supported	Although it is often helpful to align definitions between planning instruments, the units in these two Plans shouldn't be aligned in this way. The units used in the proposed District Plan rules should be appropriate to the outcomes sought by the proposed provisions, e.g. to manage adverse effects on amenity, including noise and vibrations. Meanwhile, the units in the Air Regional Plan are appropriate to managing adverse effects on air quality. Our 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.	Do not align the units in this way

31 March 2025

Christchurch City Council
53 Hereford Street
PO Box 73012
Christchurch Central, 8013

Attention: City Planning Department

Dear Sir / Madam,

RE: Feedback on Plan Change 20 to the Christchurch District Plan

Lyttelton Port Company Limited (“**LPC**”) appreciates the opportunity to provide feedback on the proposed changes to the Christchurch District Plan (“**District Plan**”) Draft Plan Change 20 (“**PC20**”), seeking to better manage the interface between industrial activities and residential zones. As a landowner and operator within an established industrial zone, LPC wants to highlight that affected landowners were not (to our knowledge) consulted prior to the release of this draft. We have included detailed feedback below and believe it would be beneficial to meet and discuss this matter further, as indicated later.

Background

The Port of Lyttelton (“**the Port**”) is a regionally and nationally significant infrastructure asset operating over three locations in Greater Christchurch. Ensuring that the efficient and effective operation of the Port is appropriately provided for and protected in regional and district planning frameworks requires an integrated approach that recognises LPC’s activities at Lyttelton, CityDepot in Woolston, Midland Port in Rolleston, and the transport routes to, from and between those sites (shown in **Figure 1**).

Lyttelton Port Company Limited
Private Bag 501, Lyttelton, 8841
New Zealand

T: +64 3 328 8198
E: office@lpc.co.nz
W: lpc.co.nz

Whilst LPC's activities at Lyttelton are within the Specific Purpose (Lyttelton Port) Zone, CityDepot, located at 41 Chapmans Road, Woolston is situated within the Industrial Heavy Zone ("IH") and the Industrial General Zone ("IG") (as shown in **Figure 2** and **Figure 3**), and therefore will be affected by proposed PC20.



Figure 1: LPC sites and connecting transportation routes.



Figure 2: LPC's CityDepot site (highlighted in blue) and surrounds.

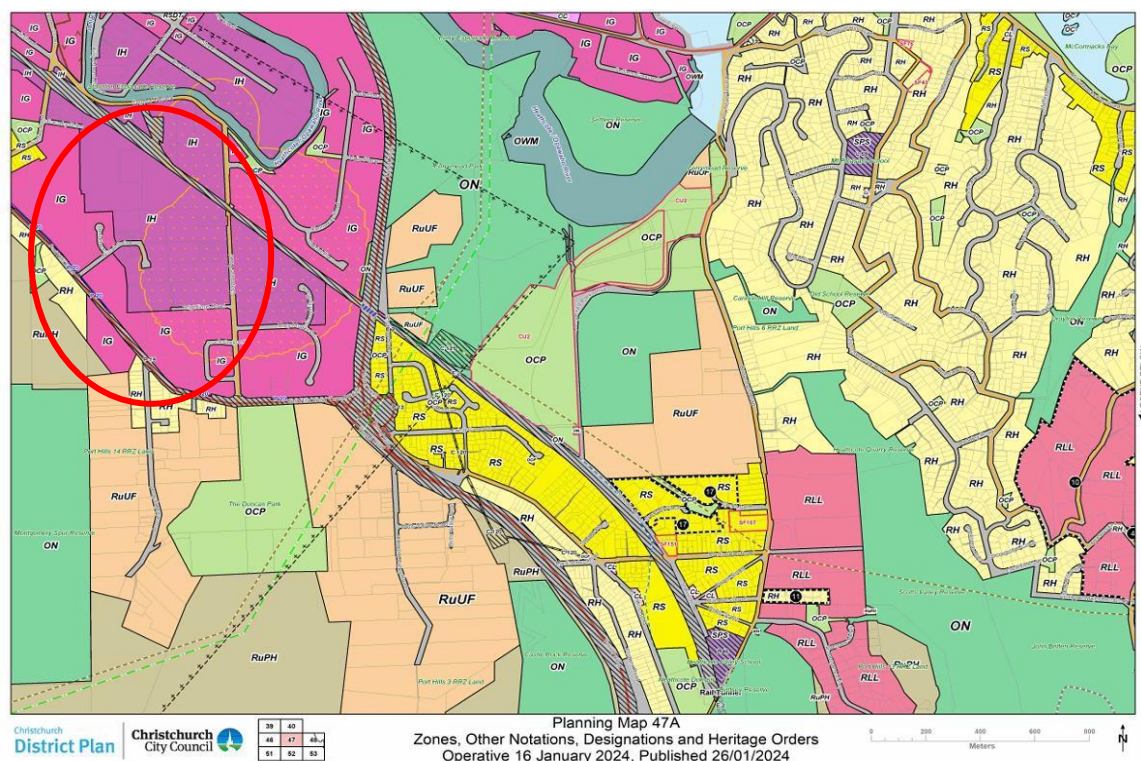


Figure 3: District Plan zoning in the vicinity of CityDepot (red circle).

CityDepot occupies 17ha of rail-side industrial land and facilitates the storage and repair of empty containers as well as providing full container handling for imports and exports moving to and from Lyttelton. It is the South Island's largest container hub, conveniently located at a rail and road interchange and with the capacity to store up to 10,000 shipping containers.¹ CityDepot is an essential part of LPC's operations, playing a crucial role in alleviating port congestion and attracting cargo to a centralised location. The site operates 24 hours a day, five and a half days per week and employs around 50 people.

The importance of CityDepot is currently recognised within Chapter 16 of the District Plan, with Policy 16.2.1.6 seeking to:

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

¹ Twenty Foot Equivalent Container Units ("TEUs").

As shown in **Figure 3**, at the CityDepot site, the IG and IH zoned land is surrounded by isolated pockets of Residential Suburban Zone (“**RS**”) to the west and southeast and Residential Hills Zone (“**RH**”) to the south and southwest. Aside from these small pockets of residential activity, the area also consists of large tracts of land zoned for rural purposes to the west, including properties operated by Zealandia Horticulture and the Ferrymead Pony Club.

LPC’s Interests and Concerns Regarding Proposed PC20

At a fundamental level, LPC has significant concerns about the Council’s intention to impose restrictions on well-established and legitimate industrial activities. LPC is of the view that such an approach is overly blunt and risks undermining the essential operations that are critical to the economic development and functionality of the City and wider region. LPC understands that PC20 does not apply to existing activities or those that already have consent to operate within industrial zones. However, these 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.

As the Council is aware, large industrial areas are becoming increasingly rare. The strategic location of the Woolston/Hillsborough industrial area, with its essential transportation links—such as direct access to both State Highways 74 and 76, as well as the rail network—and its surrounding open space and rural-zoned land, makes it well-suited for the types of industrial activities conducted there.

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. The existing residential areas in this particular location 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.

LPC expresses concern regarding the potential impact of the proposed changes in PC20 on CityDepot's operations. Despite the predominantly rural and industrial character of the surrounding land uses, 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.

Specifically, LPC has significant concerns about the following proposed changes:

- > Several provisions within PC20 seem to act as "catch-all" measures, meaning that any new or altered activity at CityDepot would trigger a resource consent application. For example, mandates that heavy industrial operations must be situated at least 200 meters from residential zone boundaries to qualify as permitted activities.² This rule 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.
- > PC20 proposes a daily cap of 60 heavy vehicles accessing a site where the access adjoins a residential zone.³ This rule could potentially impact the southern end of Chapmans Road, affecting access to the industrial area from the south. Additionally, the proposed restriction on outdoor operations of heavy vehicles or machinery between the hours of 2200 and 0700, where the site adjoins a residential zone, could further constrain the site's operational flexibility.
- > The proposed inclusion of "special character noise" (e.g., bangs, clangs, and thumps) within noise measurement rules raises concerns regarding enforcement, subjectivity, and operational feasibility.⁴ 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.
- > PC20 introduces new rules surrounding landscaping and building requirements.⁵ These have 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.

For regionally significant infrastructure, such as CityDepot, which operates as a critical gateway for freight and trade, the changes proposed by PC20 have the 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). Its importance is also recognised in the Regional Policy Statement and the District Plan as discussed above.

² Proposed PC20, Rule 16.5.1.

³ Proposed PC20, Rule 16.4.2.10.

⁴ Proposed PC20, Rule 16.7.1.11.

⁵ Proposed PC20, Rule 16.7.1.6, 16.4.2.5, 16.4.2.1.

Given the Port's role in supporting both regional and national economies, these 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.

Changes Sought to PC20

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.

In light of the above, LPC requests that the Council preserves the existing District Plan framework for the IG and IH zones for the Woolston / Hillsborough industrial area, 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 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.
- > We expect that such an analysis 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

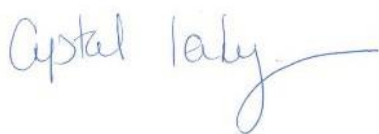
industrial activities currently taking place. The presence of industrial operations at this location supports vital economic activities, such as logistics, manufacturing, and other sectors that drive growth and job creation, and make a significant contribution to the broader regional and national economy.

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.

LPC does however support the proposal as part of PC20 to classify residential and sensitive activities within industrial zones as non-complying. This is considered to be an effective measure that will also help to prevent adverse reverse sensitivity effects in the future.

We appreciate the opportunity to provide feedback and trust that the Council will take LPC's views into consideration when refining the proposed PC20. Given the potential importance of PC20 on LPC's operations at CityDepot, LPC would appreciate the opportunity to meet with the Policy Team to discuss these issues further prior to notification.

Yours sincerely,

A handwritten signature in blue ink that reads "Crystal Lenky". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Crystal Lenky

Head of Environment and Sustainability

Lyttelton Port Company

crystal.lenky@lpc.co.nz

FEEDBACK ON PLAN CHANGE 20 – INDUSTRIAL PLAN CHANGE TO THE CHRISTCHURCH DISTRICT PLAN

To: Christchurch City Council Engagement Team
53 Hereford Street
PO Box 73012
Christchurch Central
Christchurch 8013

letstalk@ccc.govt.nz

Attention: Hannah Ballentyne, Senior Engagement Advisor

Name of Submitter: Argosy Property No.1 Limited

Address: C/- MinterEllisonRuddWatts
PO Box 105 249
Auckland City, 1143
Attention: Bianca Tree
Email: bianca.tree@minterellison.co.nz

Feedback on Plan Change 20 – Industrial Plan Change to the Christchurch District Plan

1. Introduction

- 1.1 This is feedback on Christchurch City Council (**Council**) Draft Plan Change 20 – Industrial Plan Change (**Draft PC20**) to the Christchurch District Plan (**Plan**) by Argosy No. 1 Limited (**Argosy**).
- 1.2 Argosy appreciates the opportunity to provide feedback on Draft PC20.
- 1.3 Argosy is a commercial property ownership company that owns a portfolio of industrial, office and retail properties, predominantly in the Auckland, Christchurch and Wellington regions. Argosy's investment strategy is to maintain a diversified portfolio of quality properties and build its portfolio around a mix of core and value add properties.
- 1.4 In Christchurch, Argosy owns 8 Foundry Drive, Hillsborough, an industrial site used for cool storage. The property is zoned Industrial General, and neighbours the Lyttleton Port Company (LPC) inland port located in Woolston to the east and a residential enclave to the west. Planning maps for this property are attached in **Appendix A** and a site layout map is attached as **Appendix B**.
- 1.5 In this feedback, Argosy will:
 - (a) highlight the economic benefits that industrial activities bring to Christchurch, including their recognition in the provisions of the current planning framework; and
 - (b) comment on Draft PC20 and the significant implications of the proposed revised plan provisions on the efficient and appropriate use of industrial land and activity in Christchurch.
- 1.6 Argosy opposes Draft PC20 in full and requests that the Council does not proceed to notify PC20.
- 1.7 We expand below.

2. Economic benefits of industrial activities in Christchurch and current planning framework

- 2.1 The Canterbury population is expected to increase by 25% between 2018-2048, fuelling the Christchurch economy, including within the biggest sectors of advanced manufacturing, professional

services, healthcare and social assistance, construction and exports. Advanced manufacturing in particular employed 36,300 people and contributed \$4,128,000 million to Canterbury's GDP in 2019.¹

- 2.2 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. Despite this, there continues to be a shortage of industrial land in Christchurch. Industrial vacancy in our major markets is some of the lowest globally, with Christchurch at 1.7% in 2025.² However, investor appetite for industrial assets remains strong, with both prime-grade and lower-value secondary stock attracting high demand.³ This has maintained pressure and constraints on existing industrial activities and operators and has implications for expansion opportunities for a broad range of operators and activities.⁴
- 2.3 The importance and role that industrial land and activities play in Christchurch's economy, has been recognised in higher-order planning and policy documents:
- (a) Relevant objectives of the Canterbury Regional Policy Statement (RPS) recognise and provide support for existing industrial land and activity including:
 - (i) Objective 5.2.1(2)(c) encourages sustainable economic development by enabling business activities in appropriate locations.
 - (ii) Objective 6.2.6(2) provides that areas used for existing industrial activities are to be used primarily for that purpose, rather than as a location for new commercial activities except when identified for brownfield redevelopment. The principal reasons and explanation for objective 6.2.6 states that "The locations selected for industrial business land development are also key for rebuilding and the forward planning of the transport network and associated freight hubs".
 - (iii) Objective 6.3.6 is to ensure that provision, recovery and rebuilding of business land maximises business retention, attracts investment, and provides for healthy working environments, including by (1) promoting the utilisation and redevelopment of existing business land.
 - (b) In 2014, Council's section 32 report for the now-operative Christchurch District Plan identified that a well-functioning and growing industrial sector is fundamental to Christchurch's recovery and the economic development of the broader Canterbury region.⁵
 - (c) The Canterbury Land Use Recovery Plan (**LURP**) in 2018 identified a projection of uptake in industrial land and noted that industrial rebuild activity will lead to additional growth, including in construction and manufacturing (i.e. industrial) sectors which generally require larger sites.⁶ Desired LURP outcomes include that sufficient industrial business land is available to accommodate relocations and industrial sector growth.⁷ The LURP also identified a need to

¹ Otautahi Christchurch "Christchurch Economy" (2019) [Christchurch Economy - ChristchurchNZ.com](https://www.christchurchnz.com/economy)

² CBRE "New Zealand Real Estate Market Outlook 2025" March 9 2025, [New Zealand Real Estate Market Outlook 2025 | CBRE New Zealand](https://www.cbre.co.nz/press-releases/acute-shortage-of-industrial-land-leaves-christchurch-occupiers-frustrated)

³ Colliers "Christchurch Industrial Report | First Half 2025" 4 March 2025, [Colliers | Colliers Essentials | Christchurch Industrial Report | First Half 2025](https://www.colliers.co.nz/press-releases/acute-shortage-of-industrial-land-leaves-christchurch-occupiers-frustrated)

⁴ CBRE "Acute shortage of industrial land leaves Christchurch occupiers frustrated", 26 April 2023, <https://www.cbre.co.nz/press-releases/acute-shortage-of-industrial-land-leaves-christchurch-occupiers-frustrated>

⁵ Christchurch City Council, Stage 1 section 32 Report for the District Plan, 27 August 2014, page 5 <https://resources.ccc.govt.nz/files/TheCouncil/policiesreportsstrategies/districtplanning/districtplanreview/Section32IndustrialChapter.pdf>

⁶ Canterbury Earthquake Recovery Authority, Land Use Recovery Plan, 31 March 2017, Executive Summary, page 14. [Document library | Environment Canterbury](https://www.canterbury.govt.nz/Document%20library/Environment/Canterbury).

⁷ Land Use Recovery Plan at 3.3 and 4.3.2.

protect industrial areas and infrastructure invested in them from being undermined by other land uses.⁸

- (d) The clear direction and desired outcome for industrial land set out in the LURP was acknowledged in the addendum section 32 report to the Christchurch District Plan.⁹

2.4 It is recognised that industrial land and facilitating industrial activities is a key contributor and component of the rebuild and general economic growth of Christchurch.

3. Key features and characteristics of industrial activities need to be provided for

- 3.1 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.
- 3.2 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.
- 3.3 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.
- 3.4 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.

4. Feedback on PC20

- 4.1 As a major property owner and operator, including Industrial sites in Auckland, Wellington and Christchurch, Argosy is concerned with the impact that Draft PC20 would have on its property at 8 Foundry Drive, Hillsborough (**Site**), and the efficient use and development of the Industrial zones in Christchurch more generally.
- 4.2 Argosy's Site is located in the Industrial General zone and a main access to the site adjoins land zoned Residential Suburban zone. The Site is located in an established industrial area, of both Industrial Heavy and Industrial General zoned land. Notwithstanding being part of an established industrial area, there is a residential enclave that extends into the industrial zoning pattern (see **Appendix A**).

⁸ Land Use Recovery Plan at 4.3.1.

⁹ Christchurch City Council, Stage 2 section 32 addendum to chapter 16, 2 May 2015, at 5
https://resources.ccc.govt.nz/files/TheCouncil/policiesreportsstrategies/districtplanning/districtplanreview/dpr_industrial_stage2section32.pdf

- 4.3 Draft PC20 proposes amendments to the objectives, policies and rules of the Plan to provide constraints on industrial zoned land where it adjoins a residential zone, while some amendments would have broader effect.
- 4.4 Draft PC20 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.
- 4.5 The draft provisions appear to penalise industrial activities for locating in proximity to residential areas, even though the site is zoned for industrial use, and fails to recognise that the residential use may have encroached into an industrial area, or that a residential 'enclave' may appropriately change in use over time.
- 4.6 It is considered that the amendments proposed in Draft PC20 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.

5. Summary of relief sought

- 5.1 Argosy seek that the Council does not proceed with notification of PC20.
- 5.2 Argosy appreciates the Council's consideration of the matters raised in this early feedback on the Draft PC20.

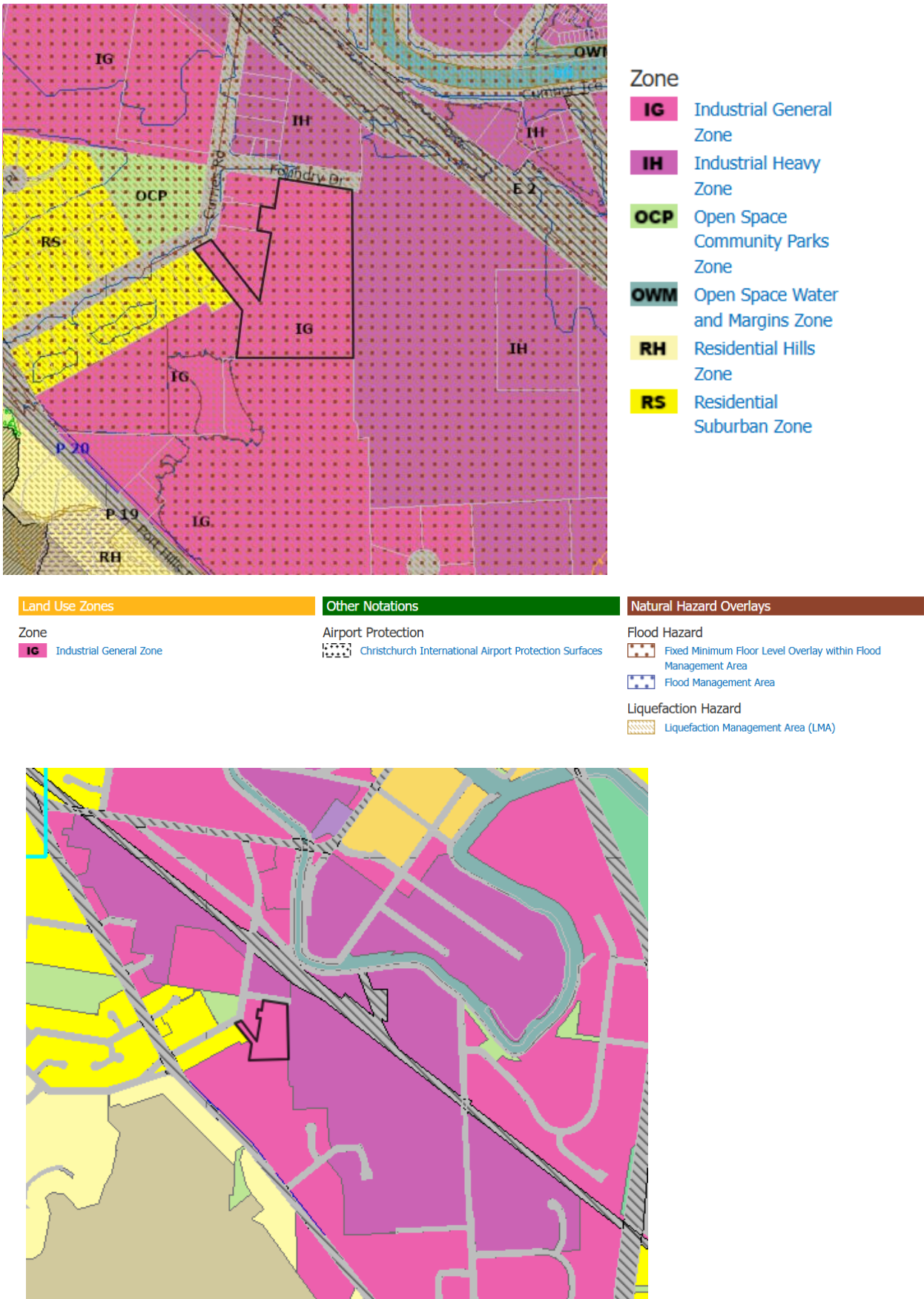
Dated this 21 day of March 2025



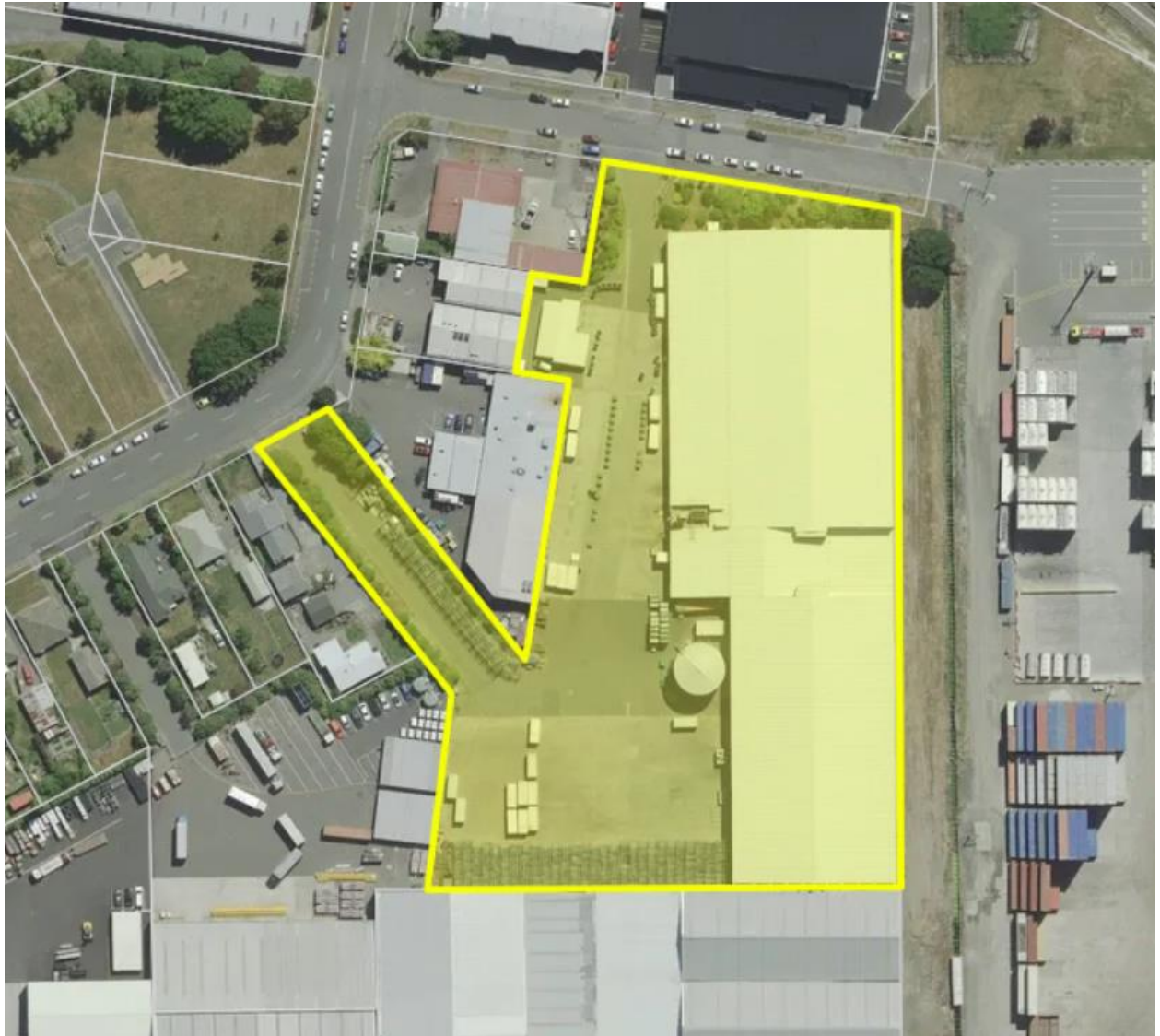
Bianca Tree
Counsel for **Argosy Property No.1 Limited**

Appendix A – Planning maps of Argosy’s property in the Christchurch District Plan

8 Foundry Drive, Hillsborough, Christchurch



Appendix B – 8 Foundry Drive site layout





Christchurch, Nelson,
Dunedin, and Whangārei
Postal address:
PO Box 1845,
Christchurch 8140

Our Reference: J15238

31 March 2025

Christchurch City Council
PO Box 73016
CHRISTCHURCH 8154

Email: LetsTalk@ccc.govt.nz

Dear Sir / Madam

Draft Plan Change 20 (Industrial Plan Change) – Feedback from Ravensdown Limited

On 24 February 2025, Christchurch City Council (**Council**) publicly invited feedback on the Draft Plan Change 20 (Industrial Plan Change) (**PC20**). Ravensdown Limited (**Ravensdown**), as the owner and occupier of industrially zoned land within the City (as discussed further below), welcomes this opportunity to provide feedback.

Planz Consultants Limited (**Planz**), who assist Ravensdown with its policy work under the Resource Management Act 1991 (**RMA**), has prepared this feedback on Ravensdown's behalf (with input from relevant personnel at Ravensdown). It is noted that Planz has also assisted other industrial activities, which are potentially impacted by PC20 and have similar concerns to Ravensdown, in providing feedback on PC20.

For the purpose of managing time and resource input at this time, and as Ravensdown intends to prepare a submission on the plan change when it is publicly notified, it has been decided that specific feedback (i.e., proposed amendments) on the individual provisions of the Draft PC20 will not be provided as part of this feedback. For this reason, the feedback provided below identifies concerns and general comments on the implications of the Draft PC20, from both a general industrial activity and a planning perspective.

Ravensdown's Christchurch Works

Ravensdown interest in PC20 arises given the implications of the plan change for its Christchurch Works in Hornby (at 312 Main South Road).

Ravensdown's Christchurch Works is one of Ravensdown's two¹ manufacturing sites in New Zealand and is the only manufacturing site in the South Island (following the closure of the Dunedin Works earlier this year). The Christchurch Works, which is located within an Industrial Heavy Zone (**IHZ**) under the Christchurch District Plan (**CDP**), manufactures superphosphate and supplies other fertiliser products to New Zealand. Annually, the Christchurch Works currently manufactures between 110,000 to 160,000

¹ Ravensdown's second manufacturing site is located in Napier.

tonnes of superphosphate, and despatches between 270,000 to 310,000 tonnes of bulk products annually. Over 200 people work at the site between the manufacturing site and adjacent head office.

As background, fertiliser manufacture has taken place at the Christchurch Works since 1922, following the construction of a new plant and associated facilities. Ravensdown, which was then known as 'Ravensdown Fertiliser Co-operative', took over ownership and operation of the site, from Kempthorne Prosser in 1978.

Ravensdown's landholding in Hornby covers an area of 12.151 hectares, with the Capital Value of the site being \$48.25M (\$18M Land Value and \$30.25M of Improvements)². Ravensdown considers that the replacement value of the infrastructure and facilities at the site will be considerably more than the site's Capital Value.

Given the history of the site and its development, its proximity to the rail network, the investment in the site and the fact that Ravensdown recently decided to retain the Christchurch Works as its sole South Island manufacturing site (rather than the Dunedin Works), Ravensdown is committed to being continuing to manufacture at the site.

Finally, of relevance to the Draft PC20, is the fact that there is no Industrial General Zone (IGZ) acting as a 'buffer' between the site (and its IHZ) and the adjoining Residential Suburban Zone³ (RSZ) located to the south of the site (on the other side of Main South Road). The majority of the Christchurch Works site is located within 200m of the adjoining RSZ (as shown in the figure below).



² As at 1 August 2022.

³ This zoning has been retained as a result of PC14's decisions.

General Comment – Proposed Approach

Ravensdown, as an industrial activity that has been located at its current IHZ site for over 100-years, is 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. This is reflected in the statement on the PC20 webpage⁴ under the heading 'Why we're proposing a plan change' which states:

The effects of industrial activities on residential areas have been a concern to the Council and to some residents for a number of years.

The webpage, in outlining the reason for PC20, also outlines that there are several areas in the City where housing and industrial activities, located in appropriate zones, are adjacent or near each other (as is the case for Ravensdown). The webpage then notes that plan changes have been considered, in the past, as a result of issues associated with scrap metal / storage crushing activities⁵ and shipping container depots. It is understood that the key effects associated with these activities are noise and visual amenity.

Given these effects, Council, in proposing PC20, considered the following five options:

- **Option 1 – No Change.** This option was rejected by the Council as it does not adequately manage 'negative effects'.
- **Option 2 – PC20 (Preferred Option).** The PC20 webpage states that this option seeks to strengthen objectives and policies and to better manage the industrial / residential interface in a manner that does not curb industrial activities, but which avoids or mitigates adverse effects. This option will improve amenity over time and increase the tree canopy within industrial zones, while also correcting existing errors and improving rule clarity.
- **Option 3 – Do the Minimum.** This option would include a height restriction on outdoor storage and increased landscaping requirements at the industrial / residential interface, while also correcting existing errors and improving rule clarity. Council considered that this option would not address all adverse effects at the industrial / residential interface, such as noise and other effects associated with heavy industry.
- **Option 4 – Residential Zone Plan Change.** This plan change would require acoustic mitigation and screening within the residential zone at the industrial / residential interface. This option was rejected as it would place unnecessary costs on residential activities and would not adequately manage all negative effects.
- **Option 5 – Rezone IHZ at the Residential Interface.** Council considered that this option would not address the issue (i.e., industrial activities will still create negative effects on residential zones).

Given its intention to be able to continue to operate its Christchurch Works efficiently and effectively, Ravensdown has concerns about the likely outcomes for its operations arising from the preferred approach, as reflected in the Draft PC20. These concerns include, but are not limited to, the following:

- Ravensdown considers that 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. To Ravensdown, it seems that 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

⁴ <https://letstalk.ccc.govt.nz/PC20>

⁵ Also called 'metal recycling and dumping yards'.

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.

- It is important that councils, in establishing a land use management framework via 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. On this basis, statutory planning documents need to provide for the full range of activities that are associated with urban environments.
- While Ravensdown acknowledges that under the RMA (section 10 of the RMA), plans and plan changes cannot impinge on lawfully established existing use rights⁶, Ravensdown 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.
- 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, as stated earlier in this letter, is committed to continuing to operate the Christchurch Works at its site in Hornby for the foreseeable future.
- Ravensdown 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'.
- Ravensdown considers that PC20 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. In addition, the proposed new regulatory approach does not seem to consider the requirement of section 16 of the RMA for activities to avoid unreasonable noise.
- Taken as a whole, the proposed new landscaping requirements seem to 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

⁶ The PC20 webpage reflects this fact as it states that PC20 will not place new requirements or conditions on existing industrial activities.

zone. 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.

Comment on Draft Provisions

In relation to the specific provisions of the Draft PC20, Ravensdown also makes the following concerns and comments:

- **Definition of 'Machinery'**. Given the role that this definition plays in Rules 16.4.2.5, 16.5.2.5 and 16.6.2.6 (as addressed below), it is considered that this definition is both problematic and unnecessary. The definition 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'.

- **Special Audible Characteristics** (Policy 6.1.2.1.1(a) and Rule 6.1.4.1(a)).

Ravensdown understands 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).

Alternatively, rather than implement the proposed amendment (as outlined in PC20), 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).

- **Policy 16.2.1.3(a)(iv)(A)**. The proposed amendment to this policy 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). For this reason, this amendment is supported.
- **Objective 16.4.3 and Policy 16.4.3.2**. Ravensdown is concerned about the proposed amendments to these provisions. In Ravensdown's opinion, the proposed amendments 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 (as discussed below), 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)).

- **Landscaping.**

PC20 seeks to add a range of landscaping requirements, including landscape strips (2m or 3m wide) where sites adjoin residential zones and roads and a general requirement for additional trees based on net site area and / or parking. There are also proposed rules whereby any solid fence cannot be placed between a landscape area and a road boundary.

Ravensdown does not necessarily oppose the concept of requiring landscaping strips alongside roads (especially where opposite a residential zone), and where a site immediately adjoins a residential zone. Indeed, Ravensdown already 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). The requirement for landscaping in industrial (and commercial) 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 through two separate independent hearing processes, 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 summary, Ravensdown opposes the rules that require 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.

- **Maximum Height for Buildings** (Rules 16.4.2.1 and 16.5.2.1).

Ravensdown does not necessarily oppose these rules but considers that the 20m permitted height restriction in the IHZ, that would apply to the Christchurch Works, has the potential to place an additional regulatory burden on any development activities that may take place at the site in the future.

In addition, it is considered that the phrasing of the rules could be improved to provide more clarity about where and how the rule applies. Potential amendments to the rules are as follows:

The maximum height of any building located between 20 and 200m ~~of a~~ from the boundary of a residential zone ...

- **Use of Heavy Vehicles and Machinery adjoining Residential Zones** (Rules 16.4.2.9, 16.5.2.9, and 16.6.2.9).

Ravensdown opposes these rules. Ravensdown considers that these activity restriction rules in reality are seeking to control potential noise generating activities at industrial sites. This is not necessary as the CDP's noise limits and section 16 of the RMA already provide Council with sufficient scope to address nuisance noise issues arising from all sites within the City, not just from industrial zones.

In addition, these rules, if they were to become operative, have the potential to place significant restrictions on industrial activities that are appropriately located in industrial zones. For example,

although Ravensdown's two accesses into the Christchurch Works do not adjoin a residential zone, 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. In addition, industrial activities can be 24-hour a day operations and the requirement to either have no heavy vehicles or machinery operating outdoors between 10pm and 7am, or the need to seek a land use consent to do so, is not consistent with appropriately providing for the efficient and effective development of industrial activities in industrial zones.

In considering the potential implications of this rule on the Christchurch Works site (and in doing so, putting aside the site's existing use rights), the site is separated from residential zones by Main South Road (a four-lane arterial road used by vehicles, including heavy vehicles, 24-hours a day). Despite this arterial road separation, as currently defined, the site is 'adjacent' to a residential zone, and therefore under the proposed rule (as currently drafted) no heavy vehicles or machinery can operate during the night-time, anywhere on the site, regardless of compliance with noise standards. Assuming activities taking place within the site comply with noise received at a residential interface, 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.

In summary, the proposed rules are not required from a noise management perspective, and proposed rules will place significant constraints on appropriately located industrial activities. As such, in no way does do the rules give effect to Strategic Objective 3.3.2.

- **Heavy Industrial Activities, in the IHZ, adjoining a Residential Zone** (Rules 16.5.1.1(P3) and 16.5.1.3(RD3)). Ravensdown also opposes this rule. The CDP has established areas of IHZ land to provide for the effective and efficient development and operation of heavy industrial activities. Requiring land use consents to be sought for heavy industrial activities within the proposed 200m industrial / residential interface is not consistent with the intent or purpose of the zone (which by its name is the correct zone for heavy industry). In addition, the 200m buffer has the potential to affect large areas of IHZ land as evident at Ravensdown's Christchurch Works (i.e., the 200m 'buffer' would cover the majority of the 12.151ha site).

In relation to the remaining provisions contained in the Draft PC20, Ravensdown has not provided any specific comments as the proposed provisions, given the issues, seem reasonable (i.e., the 'container yard', 'outdoor storage' and 'water supply for firefighting' provisions) and / or are not directly relevant to the nature of Ravensdown's industrial activities at the Christchurch Works.

Conclusion

Finally, Ravensdown wishes to thank the Council for the opportunity to provide this feedback before the commencement of the formal Schedule 1 process under the RMA. In this context, Ravensdown anticipates that the provision of this feedback enables Council to reconsider its approach to managing the industrial / residential interface, or rather reverse sensitivity effects, that PC20 is seeking to address.

If you would like to discuss any of the matters traversed in this letter, please feel free to contact either the undersigned, or Anna Wilkes at Ravensdown.

Yours sincerely
PLANZ CONSULTANTS LTD

A handwritten signature in blue ink, appearing to read 'C Taylor'.

Carmen Taylor
Consultant Planner (Partner)

Phone: 021 321 781

Email: carmen@planzconsultants.co.nz

cc: Anna Wilkes, Chief Environment and Sustainability Officer, Ravensdown Limited
(via email – anna.wilkes@ravensdown.co.nz)

Lauren Kensington, National Environmental Manager, Ravensdown Limited
(via email – lauren.kensington@ravensdown.co.nz)

28 March 2025

03 941 8999

Multicultural Recreation and Community
Centre, 455 Hagley Avenue, Christchurch 8011

Hannah Ballantyne
Senior Engagement Advisor
Christchurch City Council
letstalk@ccc.govt.nz

ccc.govt.nz

Kia ora

Submission on Plan Change 20 - Industrial Plan Change

The Waihoru Spreydon-Cashmere-Heathcote Community Board welcomes the opportunity to provide a submission to the Christchurch City Council on Plan Change 20 - Industrial Plan Change and thanks staff for the work done on this matter.

Our Community Board Plan's vision is that "Our people are actively engaged and contribute to thriving communities and environments, where they feel they belong and are safe and connected with each other." The Board's statutory role is "to represent, and act as an advocate for, the interests of its community" (Local Government Act 2002, section 52).

The Board provides this submission in its capacity as a representative of the communities in the Spreydon-Cashmere-Heathcote area.

The industry residential interface is a significant issue for parts of the Spreydon-Cashmere-Heathcote areas. The Waihoru Spreydon-Cashmere-Heathcote Community Board supports the proposed plan change 20, which takes a stance of making positive changes for the future.

Your sincerely



Callum Ward
Chairperson
Waihoru Spreydon-Cashmere-Heathcote Community Board
Christchurch City Council

ENVIRO NZ SERVICES LTD FEEDBACK ON THE DRAFT PLAN CHANGE 20 on the INDUSTRIAL INTERFACE for CHRISTCHURCH CITY DISTRICT PLAN

Submitter Details:

1. Name: Enviro NZ Services Ltd (Enviro NZ)
2. Address for Service:
Postal: C/- Enviro NZ Services Ltd
PO Box 92810
Penrose
AUCKLAND 1642

Email: kaaren.rosser@environz.co.nz
3. Contact Person: Kaaren Rosser
Environmental Planner
Laurence Dolan
Environmental Manager
4. Date of Feedback: 31 March 2025

Introduction:

5. Enviro NZ Services Limited (Enviro NZ) is the second-largest solid and liquid waste management company in New Zealand.
6. Enviro NZ owns and operates significant portions of the Country's waste management infrastructure including landfills, waste treatment facilities, recycling facilities and waste transfer facilities. Enviro NZ also provides waste and recycling collection services for Councils, businesses and households throughout New Zealand.
7. Enviro NZ operates waste collection, waste transfer stations, and chemical recycling services in Christchurch City.
8. As a materials management and resource recovery company, Enviro NZ is committed to managing, recovering and processing waste streams to deliver sustainable outcomes. In the delivery of these outcomes, District Plans are important documents that need to allow for essential waste infrastructure in a city or district. They must ensure that appropriate and resilient infrastructure is provided for as the vulnerability of society to infrastructure short-comings can be severely detrimental to the economic, health and social well-being. Where these activities take place near residential zones, Enviro NZ accepts that the effects of the activities must be managed to ensure adequate amenity for the residential occupants. However, the rules in place

to manage these effects should not be so onerous as to make the operation of the business unviable, or not able to be undertaken at all within the City.

Scope of Submission

9. Enviro NZ has feedback to the draft Plan Change 20.
10. Specific comments have been detailed in the table at **Appendix 1**.

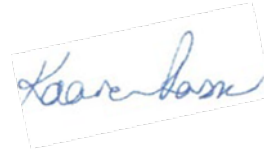
General Comments on the Draft Plan Changes

11. In general, the submitter seeks some deletions and amendments to the draft version of Plan Changes in order to allow for the needs of both industry and nearby residents. As Enviro NZ operate waste transfer and waste processing sites in the region, which are newly defined heavy industry activities, these draft changes to the District Plan are of specific interest.
12. While the national approach with regards to waste is focussed on shifting NZ to a circular economy, to enable a circular economy, waste must be separated, collected and sorted and/or processed for re-use of the constituent materials. This requires suitable sites to aggregate and/or process different waste streams, with trucks delivering the waste to site. Further sites will be required in the future to enable product stewardship schemes and sensible rules should be in place to allow for these activities to occur without undue restriction on operation, while allowing for the reasonable needs of the neighbouring residential zones.
13. It is not entirely clear from the plan change what effects some of the proposed rules are trying to manage. If it is noise, 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.
14. 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. The threshold is also 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.
15. It is also considered that if inland ports are the issue that the Plan 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.
16. In consideration of the above comments and those the submitter is happy to liaise with planning staff on any of the points raised.

Signed for and on behalf of EnviroNZ Services Ltd:



Laurence Dolan
Environmental Manager
MSc(Hons) Dip Nat Res



Kaaren Rosser
Environmental Planner
BSc, DipNatRes, CPlan, Assoc. NZPI

Appendix 1

Section of Proposed Plan	Support/ Oppose	Specific Text Identified	Relief Sought	Reasons
Draft Plan Change B: General Residential				
Chapter 2 - Definitions				
Container Yards	Oppose	<u>In relation to Rule 16.4.1.3 RD8, Rule 16.5.1.3 RD4 and Rule 16.6.1.3 RD3 means a business primarily engaged in the outdoor storage and handling of containers and/or shipping containers, whether empty or containing items.</u>	<u>In relation to Rule 16.4.1.3 RD8, Rule 16.5.1.3 RD4 and Rule 16.6.1.3 RD3 means a business primarily engaged in the outdoor storage and handling of containers and/or shipping containers, whether empty or containing items.</u>	The definition 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. This definition 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	Neutral	<i>Heavy industrial activity means:</i> a. blood or offal treating; bone boiling or crushing; dag crushing; fellmongering; fish cleaning or curing; gut scraping and treating; and tallow melting; b. flax pulping; flock manufacture or teasing of textile materials for any purpose; and wood pulping; c. storage and disposal of sewage, septic tank sludge or refuse; d. slaughtering of animals; storage, drying or preserving of bones, hides, hoofs or skins; tanning; and wool scouring; e. <u>rendering plants</u> f. the burning of waste oil in the open air or in any combustion processes involving fuel-burning equipment; g. any other processes involving fuel-burning equipment, ~~which individually or in combination with other equipment, have a fuelburning rate of up to 1000 kg/hr that have a net heat or electrical energy output of 40kW or more;~~ h. the open burning of coated or covered metal cable or wire, including metal coated or covered with varnish, lacquers, plastic or rubber; i. any activity with the potential to discharge asbestos to air, including the removal or disposal of friable asbestos, except where it complies with the Health and Safety in Employment (Asbestos) Regulations 1998 and is supervised and monitored by Occupational Safety and Health staff; j. burning out of the residual content of metal containers used for the transport or storage of chemicals; k. the burning of municipal, commercial or industrial wastes, whether by open fire or the use of incinerators for disposal of waste; l. any industrial wood pulp process in which wood or other cellulose material is cooked with chemical solutions to dissolve lining, and the associated processes of bleaching and chemical		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.

		and by-product recovery; ~~and~~ m. crematoriums and embalming services; n. <u>waste transfer and waste processing activities including composting plants;</u> o. <u>petrochemical refining;</u> p. <u>metal smelting;</u> q. <u>brickworks;</u> r. <u>cement production, batching and manufacturing of concrete products;</u> s. <u>manufacturing involving the manufacturing of paint (using volatile organic compounds), asphalt, chemical, glass and plastic;</u> t. <u>thermal power plants excluding backup generators;</u> u. <u>scrap metal recycling; and</u> v. <u>sawmills.</u>		
Machinery	Oppose	<u>Means, in relation to Rule 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>	~~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.~~	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.
Chapter 6.1 Noise				
Policy 6.1.2.1.1 Managing noise effects	Oppose	<u>iii. Applying the provisions of NZS 6802 for Special Audible Characteristics where noise generated in industrial zones is received within residential zones.</u>	~~iii. Applying the provisions of NZS 6802 for Special Audible Characteristics where noise generated in industrial zones is received within residential zones.~~	This amendment 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 rationale 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.
6.1.4.1 Measurement and assessment of noise	Oppose	a. Unless otherwise specified elsewhere in this District Plan, noise shall be measured in accordance with NZS6801:2008 "Acoustics – Measurement of environmental sound", and assessed in accordance with NZS 6802:2008 "Acoustics-Environmental noise", except that provisions in NZS 6802 referring to Special Audible Characteristics shall ~~not be applied~~ <u>only apply within residential zones where the noise received is generated within industrial zones</u>	a. Unless otherwise specified elsewhere in this District Plan, noise shall be measured in accordance with NZS6801:2008 "Acoustics – Measurement of environmental sound", and assessed in accordance with NZS 6802:2008 "Acoustics-Environmental noise", except that provisions in NZS 6802 referring to Special Audible Characteristics shall ~~not be applied~~ <u>only apply within residential zones where the noise received is generated within industrial zones</u>	Noting the comments for 6.1.2.1.1 above, in terms of unspecified Special Audible Characteristics given the inaccessibility of NZS6802, 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 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 through a variety of means.
Chapter 16 Industrial				
16.2.1.3 Policy – Range of industrial zones a.i.A	Support	a.iv.A Recognise and provide for industrial and other compatible activities that can operate in close proximity to more sensitive zones due to the nature and limited effects of activities including noise, odour, and traffic, ~~providing and in some circumstances, provide~~ a buffer between residential areas and the Industrial Heavy Zone.		The proposed wording change recognises that the Light Industry zones in Christchurch are not always surrounding a Heavy Industry zone.
16.2.3 Objective – Effects of industrial activities	Neutral	a. <u>To provide for industrial activities in a way that supports</u> ~~Adverse effects of industrial activities and development on the environment are managed to support the anticipated outcome for the industrial zone while recognising that sites adjoining an industrial zone will not have the same level of amenity anticipated by the Plan as other areas with the same zoning managing adverse effects on the environment and adverse amenity effects~~		The objective number does not appear to match that under the District Plan being 16.2.3. It is recognised 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 as below.

		<u>on adjoining zones.</u> <u>b. To improve the amenity of industrial sites at the interface with residential zones over time as industrial sites are redeveloped or where land uses change.</u> <u>c. To increase tree canopy cover in industrial zones in appropriate locations to enhance public health, wellbeing and amenity within and beyond the zone.</u> ...		
16.2.3.2 Policy – Managing effects on the environment	Oppose	a... ~~b. Effects of industrial activities are managed in a way that the level of residential amenity (including health, safety, and privacy of residents) adjoining an industrial zone is not adversely affected while recognising that it may be of a lower level than other residential areas.~~ <u>Where an industrial zone adjoins a residential zone, manage industrial activities and their effects on residential amenity (including health, safety and privacy of residents) in a way that:</u> i. <u>avoids significant adverse effects;</u> ii. <u>appropriately mitigates other adverse effects; and</u> iii. <u>improves residential amenity as the industrial zone is redeveloped or activities change.</u>	a... b. Effects of industrial activities are managed in a way that the level of residential amenity (including health, safety, and privacy of residents) adjoining an industrial zone is not adversely affected while recognising that it may be of a lower level than other residential areas, <u>and also in a way that:</u> ~~Where an industrial zone adjoins a residential zone, manage industrial activities and their effects on residential amenity (including health, safety and privacy of residents) in a way that:~~ i. ~~avoids significant adverse effects;~~ ii. ~~appropriately mitigates other adverse effects; and~~ iii. ~~improves residential amenity as the industrial zone is redeveloped or activities change.~~ iv.	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.
16.4 Rules – Industrial General Zone				
16.4.1.1 Permitted Activities P7 Ancillary retail activity	Support	a. Any ancillary retail activity shall: i. ii. iii. be limited to the display and sale of goods produced, <u>or</u> processed ~~or~~ stored on the site.		The proposed wording change 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.
16.4.1.3 Restricted discretionary activities				
16.4.1.3 Restricted discretionary activities RD1	Delete amendment	<i>The Council's discretion shall be limited to the following matters:</i> <i>As relevant to the built form that is not met:</i> ~~x. use of heavy vehicles and machinery on sites adjoining residential zones – Rule 16.7.1.11~~	<i>The Council's discretion shall be limited to the following matters:</i> <i>As relevant to the built form that is not met:</i> ~~x. use of heavy vehicles and machinery on sites adjoining residential zones – Rule 16.7.1.11~~	First of all, the number referred to in the matter of discretion does not appear to match the intended rule being 16.4.2.10, and furthermore the matters of discretion are relevant to the built form, not the activities within. However, the rule is opposed as detailed below under 16.4.2.10, and therefore a matter of discretion is not required.
16.4.1.3 Restricted discretionary activities RD8 Container Yards on sites within 200m of a residential boundary	Oppose	<u>RD8</u> <u>Container Yards on sites within 200m of a residential boundary</u> Council discretion shall be limited to...: a. <u>Interface with residential zones Rule 16.7.2.6</u>	<u>RD8</u> <u>Shipping Container Yards on sites within the Amenity Overlay ~~±200m of a residential boundary~~</u> Council discretion shall be limited to...: a. <u>Interface with residential zones Rule 16.7.2.6</u>	Notwithstanding the comment above regarding the definition of container yards, 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. The buffer should therefore 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.

16.4.1.5 Non-complying activities NC3 and NC4	Support	<u>NC3</u> a. <u>Health care facility</u> b. <u>Education facility (excluding trade and industry training activity and preschools)</u> c. <u>Guest accommodation</u> <u>NC4</u> <u>Residential activity on the Tannery site between Cumnor Terrace and Tanner Street</u>	<u>NC3</u> d. <u>Health care facility</u> e. <u>Education facility (excluding trade and industry training activity and preschools)</u> f. <u>Guest accommodation</u> <u>NC4</u> <u>Residential activity on the Tannery site between Cumnor Terrace and Tanner Street</u>	The proposed rules are supported to protect the General Industrial zones from reverse sensitivity. It will limit owner/occupier industrial units which Enviro NZ have monitored in certain locations for a number of years and which, over time, become exclusively residential units, or used for home business commercial service activities that also cause reverse sensitivity effects.
16.4.2.1 Maximum height of buildings	Oppose	a. ... <u>b. The maximum height of any building between 20 and 200 metres of a residential zone shall be 20m.</u> <u>c...</u>	a. ... <u>b. The maximum height of any building between 20 and 200 metres of a residential zone shall be 20m.</u> <u>c...</u>	While it is rare that industrial buildings go over 20m in height in general, why is this rule with a 200m residential zone setback required when other standards would achieve the same if not better effect. The height in relation to boundary setback 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. It is not considered that the rule has sufficient reason to be progressed and that the buffer distance proposed will set a precedent when considering breaches of other standards. Is it the design of any taller buildings that are the issue or height of stacked containers? These can be managed under other standards.
16.4.2.5 Outdoor storage of materials	Oppose	a. <u>Any outdoor storage areas, and outdoor storage for yard-based suppliers, shall:</u> i. <u>not be located within the minimum setbacks specified in Rule 16.4.2.2.</u> ii. <u>be screened by landscaping, fencing or other screening to a minimum of 1.8 metres in height from any adjoining residential zone.</u> iii. <u>not be located within the minimum setbacks specified in Rule 16.4.2.3, unless the materials are 1.8m or less in height.</u> iv. <u>not be located within a required landscape strip.</u> b. <u>The maximum height of any materials placed in an outdoor storage area within 5 metres of a residential zone boundary shall be 3 metres.</u> c. <u>The maximum height of any materials placed in an outdoor storage area between 5 metres and 20 metres from a residential zone boundary shall be 8 metres.</u> d. <u>For the purpose of a.- c. above, where items are stacked or in piles the height is the cumulative height of the items.</u> e. <u>Any application arising from this rule shall not be limited or publicly notified, except where the breach is in respect of an adjoining residential zone boundary.</u>	a. <u>Any outdoor storage areas, and outdoor storage for yard-based suppliers, shall:</u> i. <u>not be located within the minimum setbacks specified in Rule 16.4.2.2.</u> ii. <u>be screened by landscaping, fencing or other screening to a minimum of 1.8 metres in height from any adjoining residential zone.</u> iii. <u>not be located within the minimum setbacks specified in Rule 16.4.2.2 or 16.4.2.3, unless the materials are 1.8m or less in height.</u> iv. <u>not be located within a required landscape strip.</u> b. <u>The maximum height of any materials placed in an outdoor storage area within 5 metres of a residential zone boundary shall be 1.8m within 3 metres, and 3m from 3m to 5m.</u> c. <u>The maximum height of any materials placed in an outdoor storage area between 5 metres and 20 metres from a residential zone boundary shall be 8 metres.</u> d. <u>For the purpose of a.- c. above, where items are stacked or in piles the height is the cumulative height of the items.</u> e. <u>Any application arising from this rule shall not be limited or publicly notified, except where the breach is in respect of an adjoining residential zone boundary.</u>	Rules i. and iii conflict and the same outcome would be achieved with the amendment proposed, however the rules should be deleted as explained below. 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.
16.4.2.6 Landscaped areas	Amend	i. <u>a. The road frontage of sites opposite a residential zone and/or adjoining an arterial road shall have a landscaping strip with a minimum width of 3 metres, that includes a minimum of 1 tree, plus a minimum of 1 tree for every 10 metres of road frontage or part thereof. Where two or more trees are required, these trees shall be planted no more than 15m apart and no closer than 5m apart.</u> <u>b.</u> iv. <u>For sites with parking areas adjoining a residential zone, 1 tree shall be planted for every 5 car parking spaces (or part thereof) within the car parking area.</u> v. <u>For every 500m² of net site area, a minimum of one medium sized tree shall be planted within the site.</u>	i. <u>a. The road frontage of sites opposite (where only a road separates the zones) a residential zone and/or adjoining an arterial road shall have a landscaping strip with a minimum width of 3 metres, that includes a minimum of 1 tree, plus a minimum of 1 tree for every 10 metres of road frontage or part thereof. Where two or more trees are required, these trees shall be planted no more than 15m apart and no closer than 5m apart.</u> <u>b.</u> iv. <u>For sites with parking areas within 5m of a adjoining a residential zone boundary, 1 tree shall be planted for every 5 car parking spaces (or part thereof) within the car parking area.</u>	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. For (iv) the clause 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. For (v), the clause is overly onerous. 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

		vi. vii. Any solid fence shall not be placed between a landscape area and the road boundary.	v. ~~For every 500m² of net site area, a minimum of one medium sized tree shall be planted within the site.~~ vi. ... vii. Any solid fence shall not be placed between a frontage landscape area and the road boundary. 	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.
16.4.2.10 Use of heavy vehicles and machinery adjoining residential zones	Oppose	a. ~~For sites with a vehicle access adjoining a residential zone, the maximum number of vehicle trips for heavy vehicles using this vehicle access shall be 60 per day.~~ b. ~~For sites adjoining a residential zone, there shall be no heavy vehicles or machinery operating outdoors between the hours of 2200 and 0700.~~ c. ~~Any application arising from this rule shall not be publicly notified~~	a. ~~For sites with a vehicle access adjoining a residential zone, the maximum number of vehicle trips for heavy vehicles using this vehicle access shall be 60 per day.~~ b. ~~For sites adjoining a residential zone, there shall be no heavy vehicles or machinery operating outdoors between the hours of 2200 and 0700.~~ c. ~~Any application arising from this rule shall not be publicly notified~~	Enviro NZ considers this rule should be deleted. There is firstly an issue of interpreting 'adjoining a residential zone' which will be problematic in defining which sites this applies to. It 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. Furthermore, this proposed rule is against the objectives of the NPSUD in that 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 unsure what the proposed rule 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. This would allow a range of solutions including phasing in electric trucks which are far quieter and changing tonal reversing alarms.
16.5 Rules – Industrial Heavy Zone				
16.5.1.1 Permitted activities P3	Oppose	P3 Heavy industrial activity ~~Nil~~ a. <u>Shall be located at least 200m from any residential zone boundary.</u>	P3 Heavy industrial activity Nil a. ~~Shall be located at least 200m from any residential zone boundary.~~	This proposed rule negates the purpose of the zone. The zone is the ONLY location in Christchurch City for heavy industrial activities. Reducing the ability of these activities to establish within 200m of a residential zone boundary is overly onerous and effectively restricts the area of the Heavy Industry zone by a significant margin. The Council should assess and publish the % area of the zone affected by this rule, and also by how it affects specific heavy industrial areas within the city. 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.
16.5.1.3 Restricted discretionary activities RD1	Oppose	The Council's discretion shall be limited to the following matters: As relevant to the built form that is not met: ~~x. use of heavy vehicles and machinery on sites adjoining residential zones – Rule 16.7.1.11~~	The Council's discretion shall be limited to the following matters: As relevant to the built form that is not met: ~~x. use of heavy vehicles and machinery on sites adjoining residential zones – Rule 16.7.1.11~~	The number referred to in the matter of discretion does not appear to match the intended rule being 16.5.2.9, and furthermore the matters of discretion are relevant to the built form, not the activities within as provided for by the additional matter of discretion (x). However, the rule is opposed as detailed below under 16.5.2.9, and therefore a matter of discretion is not required.
16.5.1.3 Restricted discretionary activities RD3	Oppose	a. <u>Any heavy industrial activity listed in Rule 16.5.1.1 P1 that does not meet the activity specific standard.</u> a. <u>Interface with residential zones – Rule 16.7.2.6</u>	~~a. Any heavy industrial activity listed in Rule 16.5.1.1 P1 that does not meet the activity specific standard.~~ a. ~~Interface with residential zones – Rule 16.7.2.6~~	P1 refers to buildings and therefore it is queried whether the reference to P1 is a mistake and should be P3. If P3, the rule is requested to be deleted for reasons above when referring to the 200m exclusion from a residential zone.
16.5.1.3 Restricted discretionary activities RD4	Oppose	<u>Container yards on sites within 200m of a residential zone boundary</u> Council discretion shall be limited to...: <u>Interface with residential zones Rule 16.7.2.6</u>	Shipping <u>Container yards on sites within the Amenity Overlay 200m of a residential zone boundary</u> Council discretion shall be limited to...: a. <u>Interface with residential zones Matter of Discretion Rule 16.7.2.6</u>	Notwithstanding the comment above regarding the definition of container yards, 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. The buffer 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.
16.5.2.1 Maximum height for buildings	Oppose	a. ... b. <u>The maximum height of any building between 20 and 200 metres of a residential zone shall be 20m.</u> c. ...	a. ... b. ~~The maximum height of any building between 20 and 200 metres of a residential zone shall be 20m.~~ c. ...	While it is rare that industrial buildings go over 20m in height in general, why is there a rule requiring a 200m setback when other standards would achieve the same if not better effect. The height in relation to boundary setback 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 setback is considered extremely onerous. It also does not accord with the NPSUD given that the heavy industry zone's purpose is for large scale industrial activities. It is not considered that the rule has sufficient reason to be progressed and that the buffer distance proposed will set a precedent for other standards when breached. Is it the design of any taller buildings that are the issue or height of stacked containers? These can managed by other means.

16.5.2.5 Outdoor storage of materials	Oppose	<i>a. Any outdoor storage areas, and outdoor storage for yard-based suppliers, shall:</i> <i>i. be screened by landscaping, fencing or other screening to a minimum of 1.8 metres in height from any adjoining residential zone.</i> <i>ii. not be located within the minimum setbacks specified in Rule 16.4.2.3, unless the materials are 1.8m or less in height.</i> <i>iii. not be located within a required landscape strip.</i> <i>b. The maximum height of any materials placed in an outdoor storage area within 5 metres of a residential zone boundary shall be 3 metres.</i> <i>c. The maximum height of any materials placed in an outdoor storage area between 5 metres and 20 metres from a residential zone boundary shall be 8 metres.</i> <i>d. For the purpose of a.- c. above, where items are stacked or in piles the height is the cumulative height of the items.</i> <i>e. Any application arising from this rule shall not be limited or publicly notified, except where the breach is in respect of an adjoining residential zone boundary.</i>	<i>a. Any outdoor storage areas, and outdoor storage for yard-based suppliers, shall:</i> <i>i. be screened by landscaping, fencing or other screening to a minimum of 1.8 metres in height from any adjoining residential zone.</i> <i>ii. not be located within the minimum setbacks specified in Rule 16.4.2.2 or 16.4.2.3, unless the materials are 1.8m or less in height.</i> <i>iii. not be located within a required landscape strip.</i> <i>b. The maximum height of any materials placed in an outdoor storage area within 5 metres of a residential zone boundary shall be 1.8m within 3 metres, and 3m from 3m to 5m.</i> <i>c. The maximum height of any materials placed in an outdoor storage area between 5 metres and 20 metres from a residential zone boundary shall be 8 metres.</i> <i>d. For the purpose of a.- c. above, where items are stacked or in piles the height is the cumulative height of the items.</i> <i>e. Any application arising from this rule shall not be limited or publicly notified, except where the breach is in respect of an adjoining residential zone boundary.</i>	Rules i. and ii conflict and the same outcome would be achieved with the amendment proposed, however the rules should be deleted as explained below. Rule (b) conflicts with 16.5.2.2 and 16.5.2.3 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 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, especially a heavy industry zone, where the rules should be more permissive for industrial activities. 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.
16.5.2.6 Landscaped areas	Amend	<i>i. a. The road frontage of sites opposite a residential zone and/or adjoining an arterial road shall have a landscaping strip with a minimum width of 3 metres, that includes a minimum of 1 tree, plus a minimum of 1 tree for every 10 metres of road frontage or part thereof. Where two or more trees are required, these trees shall be planted no more than 15m apart and no closer than 5m apart.</i> <i>b.</i> <i>ii.</i> <i>v. For sites with parking areas adjoining a residential zone, 1 tree shall be planted for every 5 car parking spaces (or part thereof) within the car parking area.</i> <i>vi. For every 500m² of net site area, a minimum of one medium sized tree shall be planted within the site.</i> <i>vii.</i> <i>x. Any solid fence shall not be placed between a landscape area and the road boundary.</i>	<i>i. a. The road frontage of sites opposite (where only a road separates the zones) a residential zone and/or adjoining an arterial road shall have a landscaping strip with a minimum width of 3 metres, that includes a minimum of 1 tree, plus a minimum of 1 tree for every 10 metres of road frontage or part thereof. Where two or more trees are required, these trees shall be planted no more than 15m apart and no closer than 5m apart.</i> <i>b.</i> <i>ii.</i> <i>v. For sites with parking areas within 5m of a adjoining a residential zone boundary, 1 tree shall be planted for every 5 car parking spaces (or part thereof) within the car parking area.</i> <i>vi. For every 500m² of net site area, a minimum of one medium sized tree shall be planted within the site.</i> <i>vii.</i> <i>x. Any solid fence shall not be placed between a frontage landscape area and the road boundary.</i> <i>....</i> <i>Delete rule</i>	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 a heavy industrial zone on the other. This occurs in the Woolston area. The proposed amendment clarifies that this rule would not apply in this circumstance. For (v) the clause 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. For (vi), the clause is overly onerous. With large buildings required on most heavy 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 heavy 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 may 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.
16.5.2.9 Use of heavy vehicles and machinery adjoining residential zones	Oppose	As above for 16.4.2.10.	Delete rule	As above for 16.4.2.10.
16.6 Rules – Industrial Park Zone				
16.6.1.3 Restricted discretionary activities	Oppose	<i>The Council's discretion shall be limited to the following matters:</i> <i>As relevant to the built form that is not met:</i>	<i>The Council's discretion shall be limited to the following matters:</i> <i>As relevant to the built form that is not met:</i>	The number referred to in the matter of discretion does not appear to match the intended rule being 16.6.2.9, and furthermore the matters of discretion are relevant to the built form, not the activities within as detailed by the proposed matter. However, the rule is opposed as detailed below under 16.6.2.9, and therefore a matter of discretion is not required.

RD1		 <u>~~ix. use of heavy vehicles and machinery on sites adjoining residential zones – Rule 16.7.1.11~~</u>	 <u>~~ix. use of heavy vehicles and machinery on sites adjoining residential zones – Rule 16.7.1.11~~</u>	
16.6.1.3 Restricted discretionary activities RD3	Neutral	<u>Container yards on sites within 200m of a residential zone boundary</u> <u>Council discretion shall be limited to...:</u> <u>Interface with residential zones Rule 16.7.2.6</u>	<u>Shipping Container yards on sites ~~within the~~ Amenity Overlay 200m of a residential zone boundary</u> <u>Council discretion shall be limited to...:</u> <u>Interface with residential zones Matter of Discretion Rule 16.7.2.6</u>	Given the industrial park zone, the submitter is neutral on this rule, but also considers the comments below relevant. Notwithstanding the comment above regarding the definition of container yards, 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. The buffer 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.
16.6.1.5 Non-complying activities NC5	Support	<u>a. Residential activity</u> <u>b. Health care facility</u> <u>c. Education activity (excluding trade and industry training activity and preschools)</u> <u>d. Guest accommodation</u>	<u>a. Residential activity</u> <u>b. Health care facility</u> <u>c. Education activity (excluding trade and industry training activity and preschools)</u> <u>d. Guest accommodation</u>	This rule is supported to reduce reverse sensitivity on industrial activities.
16.6.2.6 Outdoor storage of materials/car parking	Oppose	<u>As above for 16.4.2.5</u>	<u>Delete as for 16.4.2.5 above</u>	Reasons as above for 16.4.2.5
16.6.2.7 Landscaped Areas	Neutral	<u>As shown for 16.6.2.7</u>		Proposed changes are acceptable in the context of the Industrial Park zone.
16.6.2.9 Use of heavy vehicles and machinery adjoining residential zones	Oppose	<u>a. For sites with a vehicle crossing adjoining a residential zone the maximum number of vehicle trips for heavy vehicles using this vehicle crossing shall be 60 per day.</u> <u>b. For sites adjoining a residential zone there shall be no heavy vehicles or machinery operating outdoors between the hours of 2200 and 0700.</u> <u>c. Any application arising from this rule shall not be publicly notified.</u>	<u>~~a. For sites with a vehicle crossing adjoining a residential zone the maximum number of vehicle trips for heavy vehicles using this vehicle crossing shall be 60 per day.~~</u> <u>~~b. For sites adjoining a residential zone there shall be no heavy vehicles or machinery operating outdoors between the hours of 2200 and 0700.~~</u> <u>~~c. Any application arising from this rule shall not be publicly notified.~~</u>	As above for 16.4.2.10. In addition, the objective of the zone recognises that the Industrial Park zone generates higher volumes of traffic than other industries. This should be recognised.
16.7.1 Matters of discretion for built form standards				
16.7.1.11 Use of heavy vehicles and machinery adjoining residential zones	Oppose	<u>a. In relation to use of heavy vehicles and machinery between 2200 and 0600 hours:</u> <u>i. The impact of the noise level generated, location, frequency, duration, intensity and any special audible characteristics of the vehicles and machinery on the anticipated amenity of residential sites, including but not limited to the protection of sleep.</u> <u>ii. The effectiveness of any mitigation measures, including but not limited to reduction of noise at source, alternative techniques or machinery which may be available, insulation or enclosure of machinery, acoustic fencing and the management of outdoor areas.</u> <u>b. In relation to the number of heavy vehicle movements exceeding 100 per day:</u> <u>i. The extent to which any additional heavy vehicle movements will result in adverse effects on the anticipated amenity of residential sites due to noise, vibration, dust, nuisance, glare and fumes.</u> <u>ii. The extent to which any additional heavy</u>	<u>~~a. In relation to use of heavy vehicles and machinery between 2200 and 0600 hours:~~</u> <u>~~i. The impact of the noise level generated, location, frequency, duration, intensity and any special audible characteristics of the vehicles and machinery on the anticipated amenity of residential sites, including but not limited to the protection of sleep.~~</u> <u>~~ii. The effectiveness of any mitigation measures, including but not limited to reduction of noise at source, alternative techniques or machinery which may be available, insulation or enclosure of machinery, acoustic fencing and the management of outdoor areas.~~</u> <u>~~b. In relation to the number of heavy vehicle movements exceeding 100 per day:~~</u> <u>~~i. The extent to which any additional heavy vehicle movements will result in adverse effects on the anticipated amenity of residential sites due to noise, vibration, dust, nuisance, glare and fumes.~~</u> <u>~~ii. The extent to which any additional heavy~~</u>	This matter of discretion should be deleted as noted under the Use of Heavy Vehicles rules above. A matter of discretion in relation to a noise rule rather than a built form standard would be a better outcome. Clearly, the rule does not relate to the built form given the matters of discretion listed. The matters of discretion under (b) do not match the vehicle numbers under the rule, so it appears that the number of vehicles per day that the rule proposes to control is still draft. This matter of discretion should be deleted but if the issue is to be progressed it should be related to a Transport rule where effects on the roading network can be reviewed. However, it is reiterated that 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>vehicle movements will result in any adverse effects on the safety and efficient functioning of the road network.</u> <u>iii. the effectiveness of any mitigation measures.</u>	<u>vehicle movements will result in any adverse effects on the safety and efficient functioning of the road network.</u> <u>iii. the effectiveness of any mitigation measures.</u>	
16.7.2 Matters of discretion for activity specific standards				
16.7.2.6 Interface with residential zones	Oppose	<u>a. The extent to which the activity will result in adverse effects in terms of visual impact, noise, vibration, dust, nuisance, light spill, glare, fumes, outlook, sunlight access, privacy, odour, traffic movements including heavy vehicles, that are incompatible with the anticipated amenity values of residential sites.</u> <u>b. The extent to which the nature and scale of the operation is compatible with, and maintains, anticipated residential character and amenity values of residential sites.</u> <u>c. The extent to which the anticipated amenity values of residential sites may be adversely affected by the location, height and nature of stacked materials and the frequency and methods of handling and moving the materials.</u> <u>d. The extent to which the activity will cause or exacerbate reverse sensitivity effects on the industrial zone.</u> <u>e. The effectiveness of any mitigation measures including landscaping, acoustic attenuation, screening, site layout and limits on hours of operation.</u>	<u>a. The extent to which the activity will result in adverse effects in terms of visual impact, noise, vibration, dust, nuisance, light spill, glare, fumes, outlook, sunlight access, privacy, odour, traffic movements including heavy vehicles, that are incompatible with the anticipated amenity values of residential sites.</u> <u>b. The extent to which the nature and scale of the operation is compatible with, and maintains, anticipated residential character and amenity values of residential sites.</u> <u>c. The extent to which the anticipated amenity values of residential sites may be adversely affected by the location, height and nature of stacked materials and the frequency and methods of handling and moving the materials.</u> <u>d. The extent to which the activity will cause or exacerbate reverse sensitivity effects on the industrial zone.</u> <u>e. The effectiveness of any mitigation measures including landscaping, acoustic attenuation, screening, site layout and limits on hours of operation.</u>	This matter of discretion should be deleted given the comments above. Many of the deleted matters of discretion refer to where these effects fall under other sections of the District Plan where the effects are better managed, such as the noise chapter, lighting chapter and transport chapter. Furthermore, there is no qualification in the matters of discretion that acknowledges that the site is zoned for industrial purposes, apart from exacerbating reverse sensitivity effects. The matters of discretion focus entirely on the amenity effects of the residential sites. The scale of effects that is also proposed to be managed could be interpreted broadly and result in extremely limited activities on the industrial sites affected.
16.7.1.6 Outdoor storage of materials	Amend	a. The extent of visual impacts on the adjoining environment. b. The extent to which site constraints necessitate the location of storage within the setback. c. The type and volume of materials to be stored. d. The extent, appearance and type of screening or landscaping proposed. e. The functional requirements of the activity. <u>f. The extent to which the anticipated amenity values of residential sites may be adversely affected by the location, height and nature of stacked materials and the frequency and methods of handling and moving the materials.</u>	a. The extent of visual impacts on the adjoining environment. b. The extent to which site constraints necessitate the location of storage within the setback. c. The type and volume of materials to be stored. d. The extent, appearance and type of screening or landscaping proposed. e. The functional requirements of the activity. <u>f. The extent to which the anticipated amenity values of adjoining residential sites may be adversely affected by the location, and height and nature of stacked materials and the frequency and methods of handling and moving the materials</u>	The scope of the additional matter of discretion is too broad and should be qualified to adjoining residential sites only. It is not appropriate for the matter of discretion to be focussed on the look or nature of the stacked materials, when the landscaping clause is effective for this matter. Similarly, 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.

31 March 2025

Christchurch City Council

To Whom It May Concern

Early Feedback to Plan Change 20

Resource Recycling Technologies NZ Ltd is one of the largest owned independent metals recycling businesses in the south island, located at 62 Chapmans Road, Woolston. We have been operating since 1998 when two operators joined forces to build a (at the time) “state-of-the-art” metal recycling facility. We currently employ 50 staff and provide an essential service to Canterbury businesses and public for the recycling of ferrous and non-ferrous metals. Not only does this divert valuable resources from land-fill, we also generate export earnings and support the local community.

We are keen to provide feedback on Plan Change 20 as we are very concerned that metal recycling facilities have been unreasonably and unfairly highlighted for change under this proposal.

PC20 seeks to label all metal recycling facilities as “Heavy Industrial Activity”, Resource Recycling are currently operating in an “Industrial Heavy Zone”. This zoning is for :

- Industrial and other compatible activities
- Acts as a buffer between residential areas and the Heavy Industrial Zone
- Can operate close to more sensitive zones due to the nature and limited effects of the activities that are permitted

There appears to be no clear explanation aside from a few complaints from residential dwellings against commercial activities. Little information has been supplied about these complaints and their validity. Our understanding is that 45 noise complaints were received (CCC Memo dated 22 September 2021), 10 of which were resolved by discussion with the business concerned, which leads us to believe that the current plan is effective. In general, the businesses generating noise complaints were found to be operating within the required limits and were compliant under the current plan.

The District Plan (including this plan change) cannot place new requirements or conditions on existing industrial activities. The Council can only monitor and enforce compliance of existing activities under the current rules and standards, or against resource consent conditions.

Our position is that the Council has not provided sufficient information to justify why a plan change is the most appropriate course of action.

It is also 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.

Other requirements in PC20 will negatively impact upon our ability to run a thriving and successful operation. These include:

- Restrictions on vehicle movements – 60 heavy vehicle movements daily will severely restrict our ability to trade with other commercial businesses, especially as we are the service providers for EcoCentral’s scrap metal recycling
- Prohibitions without consent on operation of heavy vehicles and machinery outdoors between 10pm and 7am – we need to run split shifts in order to keep up with processing, this will impact our ability to process and onsell
- Restrictions on stockpiles not being kept longer than 12 weeks – again this will restrict our business as we sell bulk materials which may need to be stockpiled for longer as we can be impacted by overseas demand for the product plus shipping schedules
- Landscape requirements – we have a 5 acre site, we need this area to run our 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 our sealed yard areas.

Thank you for taking the time to consider this feedback. /we are more than happy to discuss any issues further.

Yours faithfully



Janet Hernasson
Director

31st March 2025

Christchurch City Council

To Whom it May Concern,

Early Feedback to Plan Change 20

NZ Express is a locally owned and operated transport and logistics company, a part of the wider Wareing Group Limited. Our business provides an essential service within the Canterbury region and supports the wider New Zealand economy.

We are writing in response to Plan Change 20 and wish to provide feedback from an industry perspective as this appears to be distinctly overlooked.

Specifically, we address the following key points of the draft industrial rules pertaining to a notice of motion from 2022 regarding concerns with the storage and movement of shipping containers at depots near residential areas, and the potential negative effects raised therein.

1. Heavy Vehicle Trip Limit and Operation Hours

The motion proposes a limit of 60 heavy vehicle trips per day for industrial sites adjacent to residential zones, as well as restrictions on the operation of heavy vehicles or machinery outdoors between 10pm and 7am unless consent is obtained as a restricted discretionary activity.

The 60-trip figure is not an accurate representation of actual vehicle movements. A single trip to and from the port or depot typically constitutes two movements (one inbound and one outbound). We understand this would permit 30 round trips over 16 hours (two per hour). As such, the Council is effectively reducing vehicle movements to unsustainable numbers and crippling businesses who operate their own heavy vehicles or rely on deliveries and pick-ups. Secondly, 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. As such, the Change Proposal's 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.

2. Proximity of Container Yards and Heavy Industrial Activities to Residential Zones

The motion also proposes that container yards and heavy industrial activities must be located at least 200 meters from residential zones or seek consent as a restricted discretionary activity.

Property owners who purchased these properties 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. 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.

3. Outdoor Storage and Building Height Restrictions

The motion proposes an outdoor storage height limit of 3 meters within 5 meters of a residential zone boundary, as well as a 5-meter height limit between 5 and 20 meters from a residential zone. Additionally, the proposal suggests height limits for buildings, with 20 meters permitted between 20 meters and 200 meters from residential zones, and a reduced 15-meter height limit within 20 meters.

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. Furthermore, any 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.

Many businesses have heavily invested in infrastructure to support our 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. We wish to restate the lower cost of residential properties near industrial zones representing a direct trade-off for potential inconveniences. 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.

4. Residential changes vs industry changes

We note that in the event District Plan rules do require amendment, restricting existing industrial activities to mitigate poor residential property design is putting the cost and compliance burden on the wrong party.

As such, NZ Express queries why the Change Proposal 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.”

NZ Express submits that 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.

More effective enforcement and better noise mitigation in residential developments can achieve improved outcomes at a lower cost, without the adverse implications to the economy.

In conclusion, while we understand the council's concerns regarding the impact of industrial activities on residential areas, we respectfully submit 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.**

We encourage the council to carefully consider the broader implications of these proposals and not adjust such rules and regulations to adversely impact on our local businesses.

Sincerely,

Murray Young
General Manager
NZ Express Transport (2006) Ltd

Our Reference: J15238

31 March 2025

Christchurch City Council
PO Box 73016
CHRISTCHURCH 8154

Email: LetsTalk@ccc.govt.nz

Dear Sir / Madam

Draft Plan Change 20 (Industrial Plan Change) – Feedback from Annex Developments Ltd regarding The Tannery

On 24 February 2025, Christchurch City Council (**Council**) publicly invited feedback on the Draft Plan Change 20 (Industrial Plan Change) (**PC20**). Annex Developments Ltd, as owners of 'The Tannery' site in Woolston, welcomes this opportunity to provide feedback.

Planz Consultants Limited (**Planz**) have assisted Annex Developments Ltd over the last 15 years with various RMA policy and consenting matters concerning the Tannery. Following the Canterbury earthquake sequence, the previously industrial site has been comprehensively redeveloped into a mixed-use commercial complex that provides a mix of retail, hospitality, and light industrial activities. The existing complex is authorised through a series of resource consents, with a summary of these consents attached as **Appendix 1**.

Figure 1. Tannery site (red) with a newly acquired adjacent site (green)



Annex Developments note the purpose of PC20 in terms of managing buffer effects and in refining the role and function of the Industrial General Zone. PC20 is considered to present a timely opportunity for reviewing the ‘fit’ of the Industrial General Zone to sites that are largely non-industrial in character. As such, **Annex Developments seeks that the Tannery site be rezoned to a Mixed Use Zone.**

Zoning History

As the name suggests, the site has a long history of use as an industrial tannery, with the wider Woolston industrial area historically containing a wide range of heavy industrial activities. Over recent years a number of these long-established businesses have closed down and/or relocated, including the Gelita gelatine rendering plant, a large fish processing complex, and Skellerup Industries. The character of the area has therefore become ‘lighter’ following the earthquakes, especially in regard to odour-generating activities.

District Plan Review:

Annex Developments were active participants in the District Plan Review, with the Tannery being one of just two sites in the City to have a ‘Brownfield overlay’. The majority of consents obtained for the Tannery were undertaken within the brownfield overlay provisions.

Plan Change 5

Annex Developments were also a submitter on PC5. By the time PC5 was notified, much of the Tannery complex had been completed. Despite the enabling policy framework provided by the overlay, the need to respond to changing tenancies has resulted in multiple and ongoing consenting requirements which is inefficient relative to having a zone that is a better ‘fit’ with the investment and outcomes presented by the Tannery. Annex Developments therefore sought that the site be rezoned to a Commercial Local Zone, as that zone was identified as being a better ‘fit’ to the activities that were established on the site. The submission noted that the brownfield overlay could then be uplifted as ongoing regeneration opportunities would then be provided by the Commercial Local zoning.

Through the PC5 process, the s42a reporting officer for hearing stream PC5F confirmed that there were no insurmountable reasons why the site could not be rezoned (with Council evidence including an assessment from Derek Foy on retail distribution). Ms Pollisco’s assessment determined that a Mixed Use Zone (**MUZ**) was a better fit than the Commercial Local Zone sought by the submitter, with the brewery building on the southern portion of the site recommended to remain as an Industrial General Zone.

Annex Developments confirmed through the s32AA process that it did not oppose a Mixed Use Zone as an alternative, and also confirmed acceptance of the brewery building remaining within the IG Zone. The Hearing Panel accepted the merit of the change in zone and that a MUZ was a better fit than the Commercial Local Zone that was originally sought. They then went on to note that the Officer recommendation of a Mixed Use Zone differed from the relief originally sought in the submission. As such, they adopted a cautious approach regarding scope and therefore recommended that the submission be declined on scope grounds. The Panel did however make the following recommendation regarding zoning:

*While we are not in a legal position to recommend anything other than decline on the submission we do recommend that Council prepares and notifies a plan change in accordance with Ms Pollisco’s final s32AA evaluation and our findings above [on the merit of the change]”.*¹

¹ PC5 IHP recommendations, pg. 202, Vol. 1, 17 June 2022

Figure 2. Tannery zoning proposed by Ms Pollisco, with the balance of the site (red) to be MUZ and the southern portion (blue) retaining an IG zoning.



Plan Change 14

The Council sought to implement the PC5 Panel's recommendations through PC14, with the northern portion of the Tannery site shown as being rezoned to a Mixed Use Zone in PC14 as notified (and as supported by Council's s32 assessment).

Annex Developments submitted in support of this change in zone. No submissions or further submissions were received in opposition. The IHP ultimately recommended that the site's existing IG zoning be retained. Planz have been unable to find any specific reference in the IHP recommendations regarding the Tannery site. It rather appears to have been absorbed into the IHP's wider findings that the introduction of a Mixed Use Zone across the industrial parts of Waltham and Philipstown was beyond the scope of an IPI process.

Plan Change 20

Given that PC20 is yet to be notified, and is seeking to follow a standard First Schedule process, there is a clear opportunity to finally rezone the Tannery site to a zone that provides a much better fit to the activities occurring on the site. Such a change in zone aligns with the position previously recommended by Council Officers in the PC5 hearing, and through Council's own s32 process that underpinned PC14. Inclusion of the site in PC20 with a change in zone therefore does not constitute a change in position from that recently expressed by Council and instead provides a clear opportunity to overcome the scope issues that have frustrated a change in zone previously.

The only amendment to the PC14 as notified position is the inclusion in a MUZ of the recently acquired site immediately to the west of the Tannery's Garland's Road entrance (shown in green in Figure 1).

Annex Developments would welcome the opportunity to show Council Officers around the Tannery site if that would assist officers in drafting PC20 for notification.

PlanZ notes that we have provided feedback on behalf of other clients on the PC20 provisions more generally. As Annex Developments seek a change in zone, we have not included a review of the PC20 provisions on matters such as noise and landscaping with this feedback.

Yours sincerely

PLANZ CONSULTANTS LTD

A handwritten signature in blue ink, appearing to read 'Jonathan Cleave'.

Jonathan Cleave

Consultant Planner (Director)

Phone: 022 170 0204

Email: jonathan@planzconsultants.co.nz

Appendix 1. Tannery consenting history

- RMA92016381 - Establishment of brewery, café and bar within existing building;
- RMA92017076 – Additional refurbishment of existing buildings to allow for 565m² GFA additional building space for food and beverage and museum use;
- RMA92017887 - To relocate the brew bar, café premises following damage caused by the February earthquakes into a newer existing building at the front of the site;
- RMA92018640 – To allow a variation to RMA92017887 to provide an increased outdoor dining area for the Brew Bar;
- RMA92018519 – Rebuild of earthquake damaged buildings and use for specialist retail, food and beverage, office and industrial/storage/warehousing activities. This is the consent that enabled the establishment of the main galleria area.
- RMA92020952 - Reconfigure the internal floor areas to provide for an increase in retail floor area, number of tenancies and additional off-site car parking. This consent was subsequently twice amended under s.127 as follows:
 - RMA92021966 sought to change conditions of resource consent RMA92020952 to authorise one retail tenancy to exceed the 150m² tenancy size limit to provide for a Day Spa activity of 238m² including a 54m² mezzanine.
 - RMA92032343 further amended the plans to provide for a boutique cinema and function venue.
- RMA92023154 – To allow Global Fabrics to occupy the entire floor of a Business 5 zoned tenancy as part of the wider Tannery complex as a retail activity. This application concerned a separate Business 5 zoned tenancy rather than being located within the Emporium complex.
- RMA20172257 – to establish new entrance signage.
- Within scope application to confirm changes to cinema tenancy layout.
- Within scope application to utilise a portion of an existing building for a furniture store.



SUBMISSION

To: Christchurch City Council

Submission: Plan Change 20 – Industrial Plan Change

Date: 31 March 2025

Sent to: letstalk@ccc.govt.nz

Contact: Billy Clemens, Policy & Advocacy Lead
la Ara Aotearoa Transporting New Zealand
billy@transporting.nz 04 471 8283

Ia Ara Aotearoa Transporting New Zealand submission to Christchurch City Council on Plan Change 20 – Industrial Plan Change

Introduction

- 1 Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) welcomes the opportunity to make a submission on Plan Change 20 – Industrial Plan Change (the Change Proposal).
- 2 As a national road freight association, Transporting New Zealand has members and associates based in Christchurch including road freight transport businesses, scrap metal recyclers, and container park operators.
- 3 The Change Proposal was raised with us by members concerned that the changes will severely impact the economic viability of their operations and disrupt the local supply chain.
- 4 Transporting New Zealand acknowledges the importance of planning rules that carefully balance environmental, economic, social and cultural impacts.
- 5 Transporting New Zealand supports our members to operate in a responsible and compliant manner, including providing education and training opportunities, access to our national team of member advisors, and member advisories.
- 6 Transporting New Zealand has been in communication with the NZ Association of Metal Recyclers and understand we have common concerns with the Change Proposal.

Our concerns with the change proposal

- 7 Transporting New Zealand is opposed to the Change Proposal (Option 2), and would instead support, in descending order of preference:
 - 7.1. Option 4 (A different plan change that puts controls on residential zones).
 - 7.2. Option 1 (No change – rely on the current policies).
 - 7.3. 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).
- 8 Transporting New Zealand 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.
- 9 It appears from the information provided by Christchurch City Council that insufficient acoustic mitigation and screening from property developers (particularly for three-story residential buildings) is causing an increase in noise complaints.
- 10 Firstly, we would encourage the Christchurch City Council to consider whether the noise complaints could be effectively addressed through more effective enforcement of non-compliance, rather than through rule changes.

- 11 We 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.”
- 12 Secondly, we submit that even in the event District Plan rules do require amendment, restricting existing industrial activities in order to mitigate poor residential property design is putting the cost and compliance burden on the wrong party.
- 13 Transporting New Zealand queries why the Change Proposal 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”*.
- 14 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.”*
- 15 Transporting New Zealand submits that 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 restricting operating rules, if it wants to sustain regional economic growth above the national average.
- 16 More effective enforcement and better noise mitigation in residential developments can achieve improved outcomes at lower cost.

Particular concerns raised by members

- 17 Members have raised particular concern at the proposal to limit heavy “vehicle trips” per day to 60, that we understand would permit 30 round trips over 16 hours (two per hour). This could be crippling for businesses who operate their own heavy vehicles, or rely on deliveries and pick-ups.

“For industrial sites next to, or over the road from, residential zones, a maximum of 60 heavy vehicle trips per day and no operation of heavy vehicles or machinery outdoors between 10pm and 7am, otherwise it requires consent as a restricted discretionary activity with new assessment matters (new rule).” (rule 16.4.2.10, 16.5.2.9 and 16.6.2.9).
- 18 The Change Proposal’s setbacks and height limits would pose particular operational challenges for container yard operators, that would have flow-on effects on Lyttleton Port, cargo owners and other freight customers.
- 19 Concern at the time and cost associated with applying for resource consents required by the Change Proposal, particularly given tough economic conditions and sluggish forecast economic growth.

About Ia Ara Aotearoa Transporting New Zealand

Ia Ara Aotearoa Transporting New Zealand is a national membership association representing the road freight transport industry. Our members operate urban, rural and inter-regional commercial freight transport services throughout the country.

As the peak body and authoritative voice of the road freight sector, Transporting New Zealand's purpose is creating the environment where trucking operators can drive successful, safe, sustainable businesses. Our strategic priorities are:

- Providing one industry voice for advocacy
- Promoting the road freight transport industry
- Attracting talent and promoting workforce development
- Supporting our members and customers
- Sustainability, safety and responsible emissions reduction

New Zealand's road freight transport industry employs 33,000 people (1.2% of the total workforce), and has a gross annual turnover in the order of \$6 billion. This is part of a wider transport sector that employs 108,000 people and contributes 4.8 percent of New Zealand's GDP. Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand (MoT National Freight Demands Study 2018).

END

FEEDBACK ON
DRAFT PLAN CHANGE 20: INDUSTRIAL INTERFACE
ON BEHALF OF
WINSTONE WALLBOARDS LIMITED

TO: Hannah Ballantyne – Senior Engagement Advisor
Christchurch City Council
PO Box 73011
Christchurch 8154

*Feedback lodged by email – letstalk@ccc.govt.nz
Hannah.ballantyne@ccc.govt.nz*

FEEDBACK ON: Draft Plan Change 20: Industrial Interface

FEEDBACK BY: Winstone Wallboards Limited

FEEDBACK ADDRESS: Winstone Wallboard Limited
PO Box 1983
Christchurch 8140

Please note the different address for service on page four

A: INTRODUCTION

1. Winstone Wallboards Limited (**WWB**) hereby provides feedback on the draft Plan Change 20: Industrial Interface (**DPC20**).
2. **WWB's** feedback is broadly organised as follows:
 - a. **Summary of WWB's feedback**
 - b. **Statement of Interest and Background**
 - c. **Specific feedback in relation to WWB's site**
 - d. **General feedback**
 - e. **Specific feedback in relation to the regulatory context**
 - f. **Summary of relief sought**
 - g. **Conclusion**
 - h. **Historical Zoning of 217-219 Opawa Road (Appendix A)**
 - i. **Detailed relief sought (contained in Appendix B)**

B: SUMMARY

3. WWB strongly opposes Draft Plan Change 20: Industrial Interface in its entirety.
4. Whilst WWB's understands the concerns of elected members in relation to scrap metal/storage crushing activities, metal recycling, dumping and storage yards and the potential negative effects that arise from such specific activities, the proposed plan change would introduce controls that go far beyond the matters that give rise to the proposed intervention and thus the rationale for the proposed plan change is brought into question. In essence DPC20 reduces the ability for Industrial Zones to provide for Heavy Industrial

Activities. WWB's site has been consistently zoned for such purposes spanning over 60 years. Restricting the level of activity within such zones is not the appropriate method to control the effects on adjoining residential areas; which in many cases have either established or intensified after the lawful establishment of the industrial activities and attendant industrial zoning.

5. The purpose of the WWB feedback is to ensure certainty of operation, now and in the future, at their Opawa Road operation that was lawfully established through the combination of permitted activity status and district and regional resource consents and has operated at this site for over 60 years.

C: STATEMENT OF INTEREST AND BACKGROUND

Operational history and establishment

6. WWB is New Zealand's only manufacturer and largest marketer of gypsum plasterboard, drywall systems, associated GIB® products and services. WWB has multiple locations throughout New Zealand, including the Christchurch manufacturing and distribution centre at 217 - 219 Opawa Road, Christchurch. The Opawa Road site is the only site within the South Island that produces GIB® plasterboard products, with a second North Island GIB® production plant in Tauranga. Therefore, the Opawa Road site is of vital importance to the provision of a key building product in the South Island.
7. **WWB's** Opawa Road site is located within both the Industrial General and Industrial Heavy Zones (refer to **Figure 1** below).
8. The site has long history, dating back to 1961 when it was lawfully established and it now currently operates as a permitted activity in conjunction with district land use consents and regional consents in respect to landscaping, parking, access signage and discharges.
9. Given the overall importance of the continued supply of building products in the current housing crisis it is vital that there is certainty regarding the continued level of operation at this site. This can be achieved by continuing with appropriate zone provisions in the Christchurch City Plan.

Commitment to Environmental Excellence, Community and Economy

10. WWB are committed to protecting the environment in a number of ways, with waste from manufacturing processes either recycled on site or plasterboard waste composted for agricultural use.
11. WWB employs over 80 local staff and over 300 employees nationally and plays an important role in the both the Canterbury and New Zealand economy, through both its international and domestic partners to improve building products, systems and solutions.
12. The above environmental commitments flow into the RMA arena also. As the proceeding sections of this feedback demonstrate, WWB Opawa is a lawfully established site in terms of the existing CCC Operative District Plan and the relevant Ecan Regional plans. The lawfulness is based on a combination of compliance with permitted standards and the existence of various land use and discharge consents issued by CCC and Ecan respectively.
13. It is unreasonable for the investment that WWB has made for both existing and future operation of the site to be jeopardised by a proposed new zoning regime that is neither efficient nor effective in s32 RMA terms.

C.1 Site and surrounding zoning history

Site and surrounding zoning

14. The operative zoning of the site has a split zoning; with the Industrial General zoning forming the street frontage lots and the majority of the site being zoned Industrial Heavy, as shown below in **Figure 1**. The Industrial General zoned land essentially forms a 'buffer' area between the Industrial Heavy Zoning and Residential Suburban Zone. However, as shown below, the access point of the WWB site, which is zoned Industrial Heavy Zone extends to the road frontage on Opawa Road.
15. The current zoning has afforded WWB permitted activity status for its landuse activities over several decades. It is critical that the zone provisions continue to provide for WWB's activity as a permitted activity to afford certainty for WWB's continued and future viability at this site.

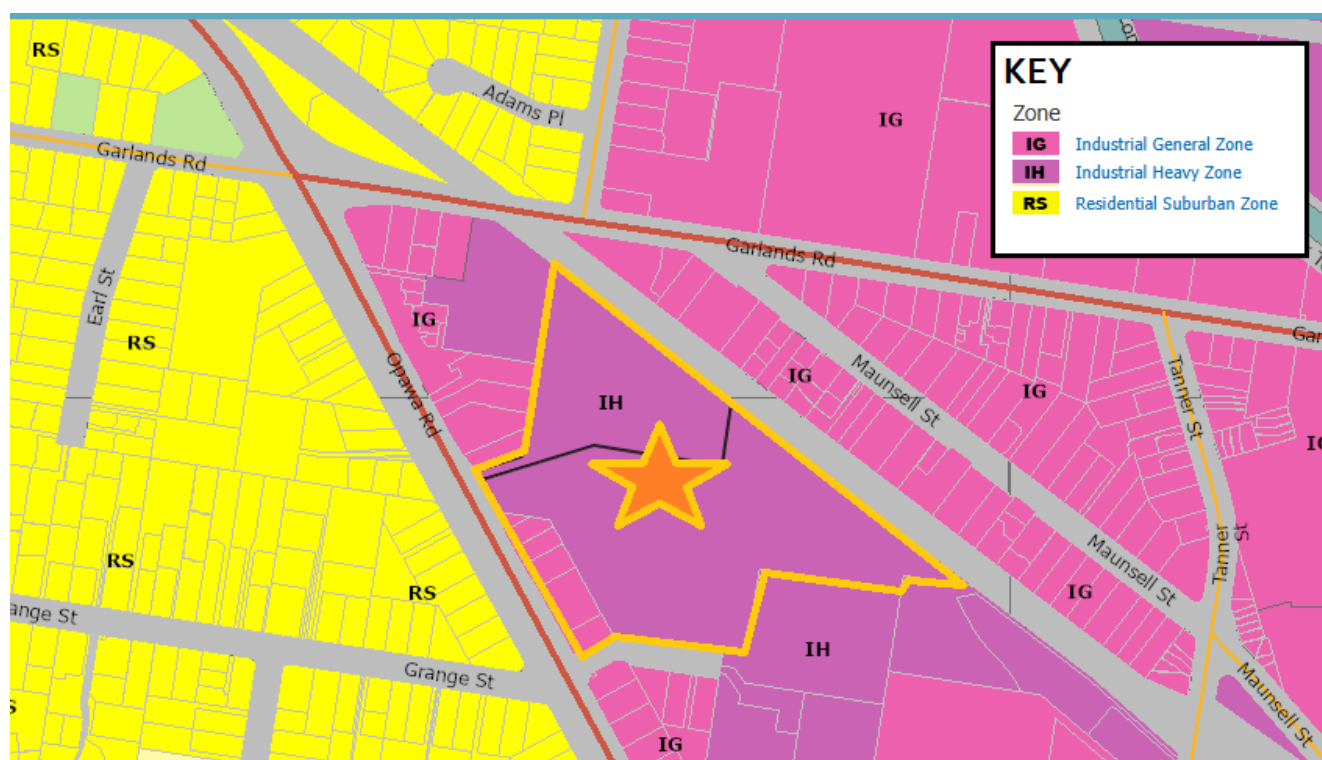


Figure 1: Zoning map showing WWB's Opawa Road site outlined in orange and depicted by a star. Source: <https://districtplan.ccc.govt.nz/?t=map> Annotated by RMG March 2025

Zone history – previous iterations of zoning in Christchurch

16. The genesis of the site's industrial zoning dates back to 1962 and is outlined in **Table 1** below and is spatially depicted by **Figures 2-5** in **Appendix A**. The majority of the site, being set back from Opawa Road (217-219 Opawa Road) has always had industrial zoning. However, the allotments along the road frontage were zoned residential until 1995, which is when the introduction of an industrial 'buffer' zone was adopted. (Refer Figure 2 in **Appendix A**).

Table 1: Zoning Genesis of the Site

Planning Document and Year	Operative Year	Zoning	Figure showing zoning in Appendix A
Operative Christchurch City Plan	1995	Business 4: Suburban Industrial and Business 5: General Industrial	Figure 3
Operative Christchurch City District Planning Scheme	1986	Industrial 3 and Residential 1	Figure 4
Operative Christchurch City District Scheme	1972	Industrial 4 and Residential 1	Figure 5
Operative Christchurch City District Plan Scheme	1962	Industrial C	Figure 6

17. The previous Christchurch Replacement District Plan (2014-2017) also zoned the site with split zoning Industrial Heavy and Industrial General with Residential Suburban Zoning to the west, which was ratified through the current district plan zoning process.
18. Therefore, the site has a long-established history of identifying the area as an appropriate location for both general and heavy industry with split zoning, where the majority of the site is identified for 'heavy industrial activity' and a more restrictive zoning along the road frontage being the 'interface' zoning between heavy industrial and residential activities.

D: GENERAL FEEDBACK COMMENTS

19. WWB is strongly opposed to the overall direction of DPC20 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.
20. The approach of DPC20 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. 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.
21. Furthermore, the direction and management of reverse sensitivity matters in DPC20 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.

22. WWB is concerned that the anticipated outcome of DPC20 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. In addition, WWB is 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 WWB's tenure.
23. Whilst WWB's understands the concerns of elected members in relation to scrap metal/storage crushing activities, metal recycling, dumping and storage yards and the potential negative effects that arise from such specific activities, WWB 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. In short, the proposed amendments do not address the resources management issues identified.

E: FEEDBACK ON THE DRAFT PLAN CHANGE 20 PROVISIONS

24. WWB has provided feedback on the DPC20 relating to the following matters:
 - a. *Planning Maps - Zoning*
 - b. *Definitions*
 - c. *Zone Objectives*
 - d. *Zone Policies*
 - e. *Zone Rules and Built Form Standards*
 - f. *Relevant District Wide Provisions*
25. Feedback on each of these matters is provided in turn below and **Appendix B** sets out the detailed relief sought.

E.1 Planning Maps

Site zoning

26. As shown in **Figure 1** above, the site has a split zoning with the frontage allotments zoned Industrial General with the remainder (and bulk) of the site zoned Industrial Heavy Zone within the Operative District Plan.
27. WWB considers that the operative zoning as shown in **Figure 1** appropriately aligns with the existing operation on site and the corresponding operative activity status for the two zones.

Surrounding zoning

28. As **Figure 1** above shows, WWB's site is directly opposite the Residential Suburban Zone, which is located some 22m across Opawa Road from the Industrial General and Heavy Zone boundary.
29. The implications of the 'adjoining' residential zoning has implications given the introduction of Rules 16.5.1.1, P3, 16.5.1.3 and Standard 16.4.2.1. The Operative District Plan defines 'adjoining' as meaning *'...includes land separated from other land only by a road, railway, drain, water race, river or stream'*.

30. As shown in **Figure 1** above, the majority of site's frontage, is separated from the Residential Suburban Zone 'only by a road' and therefore under the definition the WWB site is 'adjoining' the Residential Suburban Zone.
31. Under Rule 16.4.2.10: Use of heavy vehicles and machinery adjoining residential zones, it limits the site's ability to operate heavy vehicles or machinery between 2200hr and 0700hr. This matter is discussed in more detail below in **Section E.5**.
32. Furthermore, under Rule 16.5.1.1 (P3) to be a permitted activity, any Heavy Industrial Activity must be at least 200m from any residential boundary. The draft rule for maximum height for buildings also introduces a restriction on height where a building is within 20-200m of a residential zone. Again, the implications of the adjoining zone rules are discussed in more detail below.
33. The major concern of WWB with respect to the proximity of the 'adjoining' residential zone, is that the majority of the site is within 200m of a residential zone, as shown below in **Figure 2**. The rule implications are discussed in further detail in Section **E.5 Zone Rules and Built Form Standards** below.

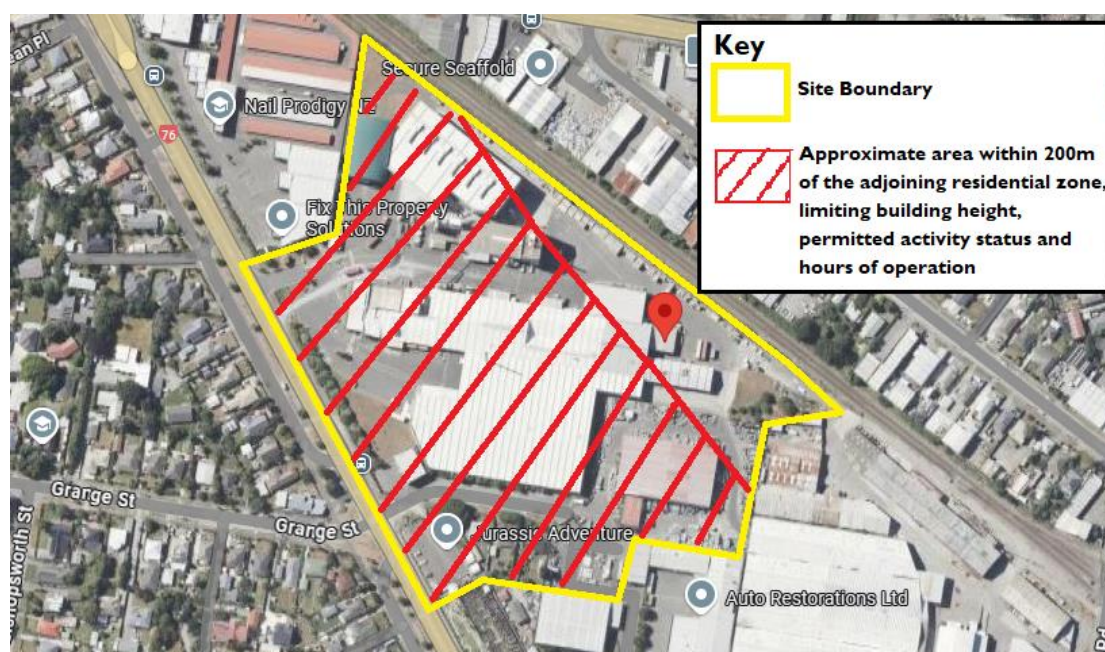


Figure 2: Aerial view of WWB's Opawa Road site showing area where draft rules would apply within 200m of a residential zone. Source: <https://districtplan.ccc.govt.nz/?t=map>
Annotated by RMG March 2025. **NOTE: Scale is approximate**

34. As notified, Plan Change 14 (**PC14**), sought to 'upzone' the surrounding Residential Suburban Zone to Medium Density Residential zone (**MDRZ**) but with a 'Qualifying Matter' that ran along the frontage of residential properties of Opawa Road adjacent to the WWB site. This qualifying matter (**QM**), the 'Industrial Interface' sought to reduce the potential building height of the **MDRZ** from 12m or three storey to 7m or two storeys to ensure potential noise reverse sensitivity effects are managed at the interface of residential and industrial zones.
35. The Council accepted the QM for the Industrial Interface where the MDRZ zoning is located adjoining an industrial zone. WWB considers this is 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.

36. To note, the Council did not 'upzone' the residential area opposite the WWB from residential suburban to MDRZ. WWB considers 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'.
37. WWB has general concerns regarding the functional mechanics and interaction of the DPC20 provisions and **PC14** 'industrial interface' QMs.

E.2 Definitions

38. WWB opposes the following definitions that have either been amended or inserted and canvases each of these in turn below:
 - i. *Heavy Industrial Activity*
 - ii. *Machinery*

Heavy Industrial Activity

39. WWB is concerned with the draft change of metrics in relation to the heat output contained in the definition of Heavy Industrial Activity.
40. More specifically there are serious concerns regarding the deletion of the following metrics '**which individually or in combination with other equipment, have a fuel burning rate of up to 1000 kg/hr**' and replacement wording "**that have a net heat or electrical energy output of 40kW or more;**"
41. As no Section 32¹ evaluation has been provided with the DPC20, WWB cannot ascertain the rationale, justification or the intended outcome Council is seeking as a result of the substantial reduction in energy output contained in the amended definition.
42. To compare the existing energy output, the average electrical heater produces 2kW of heat. The average domestic wood burner produces between 12-20kW. Therefore, as drafted, the amended definition for a 'Heavy Industrial Activity' would capture an activity that essentially provided the same heat as two domestic wood burners. WWB considers that this is an extremely restrictive and unfounded restriction which would unduly capture their operation.
43. WWB recognises the National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023 (**NPS-GHG**) seeks to reduce greenhouse gas emissions by managing the discharge to air from the production of heat for industrial processes. WWB observe that it is Environment Canterbury (ECan) who is responsible for implementing the associated **NES-GHG** regulations (and not CCC) and supports the overall reduction in GHG's.
44. 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;*'.

¹ Section 32 evaluation under the Resource Management Act 1991

45. Whilst WWB does not use coal as part of their production process, 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.
46. WWB considers the proposed amended definition in DPC20 limiting activities to a 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 in particular Policy 1(a) of NPS-GHG and is overly and inappropriately restrictive.
47. With respect to the heat output of WWB's operation, LPG burners are used 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 WWB 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.
48. Furthermore, WWB considers that the amended definition of 'Heavy Industrial Activity' does not align with the overall objective of DPC20, 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, WWB considers there is no justified rationale for the restricted quantum of output within the definition particularly in terms of the effects it seeks to manage.
49. 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.
50. WWB considers that in terms of managing 'effects' from heavy industrial activities and capturing such activities to ensure they are managed in a consenting framework, the Wellington City Plan (Partially operative 2024) definition for '**Heavy Industrial Activity**' is more appropriate and is defined as '*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.*' (**emphasis added**).
51. Therefore, WWB **opposes** the amended clause g contained in the definition for Heavy Industrial Activity and seeks that the operative definition clause g. is **retained** or otherwise **amended** to align with the Wellington City Council definition for Heavy Industrial Activity.

Machinery

52. DPC20 seeks to insert a new definition for '**machinery**' that:
Means, in relation to Rule 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. (**emphasis added**)

53. WWB considers that this definition, in particular 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. WWB considers 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.
54. Therefore, WWB seeks that this definition be deleted and consequential deletions to the associated rules also be removed. Refer to **Appendix B** for detailed relief sought.

E.3 Zone Objectives

55. In relation to both the objectives and the policies amended by DPC20, the numbering refers to Objective 16.4.3 and Policy 16.4.3.2. These references are incorrect in relation to the Operative numbering. The correct references are Objective 16.2.3 and Policy 16.2.3.2 respectively.
56. However, for ease of reference within this document, the numbering Objective 16.4.3 and Policy 16.4.3.2 has been retained.
57. DPC20 seeks to amend Objective 16.4.3: Effects on industrial activities as follows:
 - a. ~~To provide for industrial activities in a way that supports Adverse effects of industrial activities and development on the environment are managed to support the anticipated outcome for the industrial zone while recognising that sites adjoining an industrial zone will not have the same level of amenity anticipated by the Plan as other areas with the same zoning managing adverse effects on the environment and adverse amenity effects on adjoining zones.~~
 - b. To improve the amenity of industrial sites at the interface with residential zones over time as industrial sites are redeveloped or where land uses change.
 - c. To increase tree canopy cover in industrial zones in appropriate locations to enhance public health, wellbeing and amenity within and beyond the zone.
 - d. ~~b.~~ The cultural values of Ngāi Tahu/ mana whenua are recognised, protected and enhanced through the use of indigenous species in landscaping and tree planting, a multi-value approach to stormwater management in greenfield areas, low impact urban design, and the protection and enhancement of wāhi tapu and wāhi taonga including waipuna.
58. WWB considers the amended wording, in particular, the following wording of **clause a** 'managing...adverse amenity effects on adjoining zones.' is in direct conflict with Introductory text of the chapter which states:

'The adverse effects of activities are managed to support the anticipated outcome for the zone, while recognising that non-industrial sites adjoining an industrial zone will not have the same level of amenity anticipated by the Plan as other areas with the same zoning.'
59. In addition, WWB considers that the management of effects should focus on 'significant' adverse reverse sensitivity effects where residential and industrial activities share a common legal property boundary, not at the zone interface.

60. Furthermore, WWB does not consider that the insertion of **clause b.** is an effective or efficient planning mechanism to appropriately manage reverse sensitivity effects and is essentially seeking a transitional 'buffer zoning' overtime and does not address the identified resource management issue.
61. WWB does not consider that the addition of Clause C can be justified, particularly when seeking that enhanced amenity **beyond the zone.**
62. Therefore, WWB opposes the amended wording of Objective 16.4.3 and seeks that **clause a.** is amended and clause b and c. be deleted in their entirety.
63. Refer to **Appendix B** for detailed relief sought.

E.4 Zone Policies

64. As set out in paragraph 55 above, we have used the policy numbering contained within the draft provisions text, acknowledging these differ from the numbering contained in the Operative District Plan. DPC20 seeks to amend **Policy 16.4.3.2 – Managing effects on the environment.**

65. WWB feedback relates to **clause b** which as currently drafted reads:

~~**'b. Effects of industrial activities are managed in a way that the level of residential amenity (including health, safety, and privacy of residents) adjoining an industrial zone is not adversely affected while recognising that it may be of a lower level than other residential areas.**~~

Where an industrial zone adjoins a residential zone, manage industrial activities and their effects on residential amenity (including health, safety and privacy of residents) in a way that:

- i. avoids significant adverse effects;**
- ii. appropriately mitigates other adverse effects; and**
- iii. improves residential amenity as the industrial zone is redeveloped or activities change.' (Emphasis added)**

66. WWB considers that the operative wording as shown above as being deleted is appropriate and should be retained. However, if the Council wishes to further strengthen the ability to manage adverse effects, WWB considers that clauses i. and ii. are sufficient and that clause iii. is not required.
67. Additionally, WWB considers that **clause b(iii)** creates a policy that is contrary to the overall zone intent and introduction wording as set out above in para 58. Furthermore, it is unrealistic to seek an industrial activity to deliver **improved residential amenity** and therefore results in a policy that is incapable of being given effect to.
68. Furthermore, 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”² 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.”³ and this policy option was therefore rejected.

69. WWB considers that the s32 assessment of Option 4 policy is still a valid conclusion to the Draft Policy and therefore the 16.4.3.2 (b) and should also be rejected on the same basis.
70. Therefore, WWB seeks that either the operative wording for this policy is retained in full or that that clause iii. be deleted as detailed in **Appendix B**.

E.5 Zone Rules and Built Form Standards

71. WWB has concerns relating to the following rules that DPC20 seeks to amend or introduce, which are addressed in turn below:

- a. Rules 16.4.2.1 & 16.5.2.1: Maximum Building Height*
- b. Rule 16.5.1.1: Permitted Activities within the Industrial Heavy Zone*
- c. Standards 16.4.2.10 & 16.5.2.9 Use of heavy vehicles and machinery adjoining residential zones*
- d. Standards 16.4.2.6 Landscaped areas – General Industrial Zone*
- e. Matters of Discretion 16.7.1.6: Outdoor storage of materials*
- f. Matters of Discretion 16.7.1 for Built form Standard 16.7.1.11*
- g. Matters of Discretion for activity specific standards 16.7.2.6 Interface with residential zones*

Rules 16.4.2.1 & 16.5.2.1: Maximum Building Height

72. **Rules 16.4.2.1 & 16.5.2.1** both relate to the maximum height for buildings in the Industrial General and Heavy Zone and seek to introduce a new clause b, which states that the **‘maximum height of any building between 20 and 200 metres of a residential zone shall be 20 metres.’**
73. WWB considers the existing clause a of these rules, which sets the maximum height of any building within 20 metres of a residential or rural zone shall be 15 metres is sufficient in addressing potential adverse effects on shading and dominance, when also coupled with other boundary setback standards and recession plane requirements.
74. WWB seeks to understand the justification for the addition of **clause b**, which 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. Refer to **Figure 2** above to show the extent of the height reduction Rule 16.4.2.1 & 16.5.2.1 would apply to.
75. The existing WWB 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 new Maximum Building Height Rule. Given that the purpose of the Plan Change is to manage adverse effects on residential amenity, in particular effects of shading and dominance, WWB is uncertain how any residential building or structure 200m away from the industrial zone would experience adverse shading effects.

² S32 Report, Industrial Chapter, Publicly Notified on 27 August 2014, page 38

³ S32 Report, Industrial Chapter, Publicly Notified on 27 August 2014, page 39

76. Therefore, WWB considers that the existing **clause a.** of **Rules 16.4.2.1 & 16.5.2.** is a sufficient mechanism to trigger consent and manage the effects of shading and proposed new **clause b.** is too onerous without due justification and should be deleted as set out in detail in **Appendix B.**

Permitted activities – Industrial Heavy Zone

77. Rule 16.5.1.1 - P3 Heavy industrial activity, as drafted has inserted an activity specific standard for Heavy Industrial Activities, requiring them to be located at least 200m from any residential zone boundary to be permitted activity and where not, the activity status is Restricted Discretionary.
78. As mentioned above, almost the entirety of WWB's site is located within 200m of the residential zone to the west of the site, which is 'Residential Suburban Zone'.
79. On further assessment of other Industrial Heavy Zones within the city, there are multiple sites where the Industrial Heavy Zone is located within 200m of a residential zone and will result in increased consenting requirements and costs for the industrial business community which have not been adequately or appropriately justified in a s32 RMA sense.
80. It is WWB understanding that the purpose of the Industrial General Zone which generally surrounds the Heavy Industrial Zone, provides for an appropriate activity buffer between the industrial and residential interface.
81. Under the Operative Plan, the difference in intent of the Industrial General vs Industrial Heavy zones is the provision for Heavy Industrial Activities within the Industrial General Zone being a full Discretionary activity, whereas the activity status is permitted in the Industrial Heavy Zone.
82. WWB considers that the existing operative zoning is the most appropriate planning mechanism to manage heavy industrial activities at the interface between the residential and industrial zones. Therefore the draft new activity status 'Rule 16.5.1.1 - P3' is not required and is also inconsistent with **Policy 16.2.1.3 Range of industrial zones (v) Industrial Heavy Zone** '*Recognise and **provide for** a full range of industrial and other compatible activities that generate potentially significant effects, including relatively high levels of noise, odour, heavy traffic movements, and the presence of significant amounts of hazardous substances, necessitating separation from more sensitive activities.*' (**emphasis added**)
83. Therefore, WWB seeks that the '**activity specific standard**' for this **Rule 16.5.1.1 - P3 Heavy industrial activities** be deleted. Refer to **Appendix B** for detailed relief sought.

Standards 16.4.2.10 & 16.5.2.9 Use of heavy vehicles and machinery adjoining residential zones

84. Following on from the concerns raised regarding the new definition of 'machinery', WWB has serious concerns in relation to the standard that seeks to limit the use of 'machinery' between the hours of 2200-0600/0700 in the Industrial General and Industrial Heavy respectively.
85. The current manufacturing operation on-site operated 24 hours, 7 days a week, and has a good relationship with the surrounding residential properties. The introduction of standard 16.4.2.10/16.5.2.9 would significantly limit WWB's ability of supply the South Island's market

with GIB® board. Therefore, WWB considers that the introduction of these standards is contrary to the National Policy Statement on Urban Development, **Policy 1(b)**.

“Policy 1 : 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”

86. The restriction of operating hours, irrespective of whether any activity complies with relevant noise standards, is overly restrictive and is completely without justification. In terms of a s32 evaluation of this standard, WWB considers that 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. Significantly, the Council has not produced a s32 assessment justifying this standard or any of the proposed provisions for that matter.
87. Furthermore, the restriction on vehicle movements to 60 per day, 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;*
88. Therefore, WWB opposes these standards and seeks both be deleted as set out in detail in **Appendix B**.

Standards 16.4.2.6 Landscaped areas – General Industrial Zone

89. The increased requirement for landscaped areas of Standard 16.4.2.6 in particularly, clause v, which seeks ‘**For every 500m² of net site area, a minimum of one medium sized tree shall be planted within the site’** (*emphasis added*) would result a substantial requirement of trees on sites that, for the majority of Industrial sites, are well in excess of 500m². For example, WWB’s 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 and WWB considers that this requirement.
90. 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.
91. In addition, WWB considers that the requirement for additional landscaping within the site is contrary to **Policy 16.4.3.2** which seeks that ‘*landscaping and screening, particularly at the interface with arterial roads fulfilling a gateway function*’ and does not recognise ‘*the functional needs of the activity*’ which **Policy 16.4.3.2** acknowledges.
92. WWB therefore opposes the draft landscaping provisions and considers this should be deleted as set out in **Appendix B**.

Matters of Discretion 16.7.1.6 for Outdoor storage of materials

93. Where a restricted discretionary activity is triggered under Rules 16.4.2.5, an additional matter of discretion has been inserted by DPC20 as follows:

‘f. The extent to which the *anticipated amenity values of residential sites* may be adversely affected by the location, height and nature of stacked materials and the frequency and methods of handling and moving the materials. (*emphasis added*)

94. WWB does not understand the justification for this additional matter of discretion given the wide range of matters already available to be considered as part of the consent process. Accordingly, WWB seek the removal of *Matters of Discretion 16.7.1.6 for Outdoor storage of materials*.
95. Alternatively, WWB considers that the word ‘*anticipated amenity values of residential sites*’ of **clause f** is contrary to the both the introductory text of the Industrial Zone chapter and **Policy 16.1.2.3 – Range of industrial zones (a)(ii)** and therefore **clause f**. should be amended to replace the word ‘anticipated’ with ‘existing’ as set out in detail in **Appendix B**.

Matters of Discretion 16.7.1 for Built form Standard Rule 16.7.1.11

96. As set out above, WWB considers that the built form standard for the use of heavy vehicles and machinery adjoining residential zones should be deleted and therefore as consequence, the matters of discretion should also be removed.
97. Therefore, WWB seeks that the matters of discretion should be deleted as set out in detail in **Appendix B**.

Matters of Discretion for activity specific standards 16.7.2.6 Interface with residential zones

98. WWB considers that the matters of discretion for the Interface with residential zones inappropriately raises the expectations of residents who, under the operative provisions, have explicitly understood that the level of amenity is reduced due to the locality and proximity to the Industrial Zones.
99. The overall effects of these matters of discretion places an unrealistic level of mitigation requirements on already lawfully established industrial operations, and the cost implications for the increased consenting requirements, in addition to further mitigation measures that the matters of discretion are seeking have not in a RMA s32 sense been justified or assessed as being the most efficient and efficient way of achieving the purpose of the Resource Management Act 1991, or the objectives in the Plan.
100. Therefore, WWB seeks that the matters of discretion are deleted and considers the existing zone provisions are fit for purpose in managing reverse sensitivity effects and further still, the direction and methods set out in PC14 are more appropriate for managing reverse sensitivity for the existing industrial/residential zone interfaces. As set out in detail in **Appendix B**.

E.5 Relevant District Wide Provisions

Noise

101. WWB is concerned that no justification has been provided in the additional clause added to **Chapter 6.1 Noise, 6.1.2.1.1 Policy - Managing noise effects**, which seeks ‘*Applying the provisions of NZS 6802 for Special Audible Characteristics where noise generated in industrial zones is received within residential zones.*’

102. Moreover, this new requirements of applying *NZS 6802 has been included in Rule 6.1.4.1 Measurement and assessment of noise*, only applies within residential zones where the noise received is generated within industrial zones.
103. Without specialist acoustic expert evidence, the impact on the ability to comply with this standard cannot be ascertained. In addition, the use of the 'Special Audible Characteristics' need to ensure that frequency and intensity are also taken into consideration and not just the presence
104. 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.
105. Therefore, WWB seeks that the operative **Policy 6.1.2.1.1** and **Rule 6.1.4.1** are retained and the amendments proposed by DPD20 are deleted.

F: CONCLUSION

106. WWB wishes to thank Christchurch City Council for the opportunity to provide feedback and seeks to be directly involved in any future draft iterations of the plan change prior to it being formally notified.
107. WWB would welcome the opportunity to discuss the content of this feedback first-hand with Plan's authors. In particular WWB would be prepared to assist in any drafting changes that might be agreed upon.

Feedback signed for and on behalf of Winstone Wallboards Limited



Jacqui Hewson
Senior Consultant Planner

022 6801921

Email: Jacqui.hewson@rmgroup.co.nz

Resource Management Group Limited

27 March 2025

Address for Service:

Winstone Wallboards Limited
C/- Resource Management Group Ltd
PO Box 25 175
WELLINGTON 6140

APPENDIX A: HISTORIAL ZONING OF 217/219 OPAWA ROAD

108.

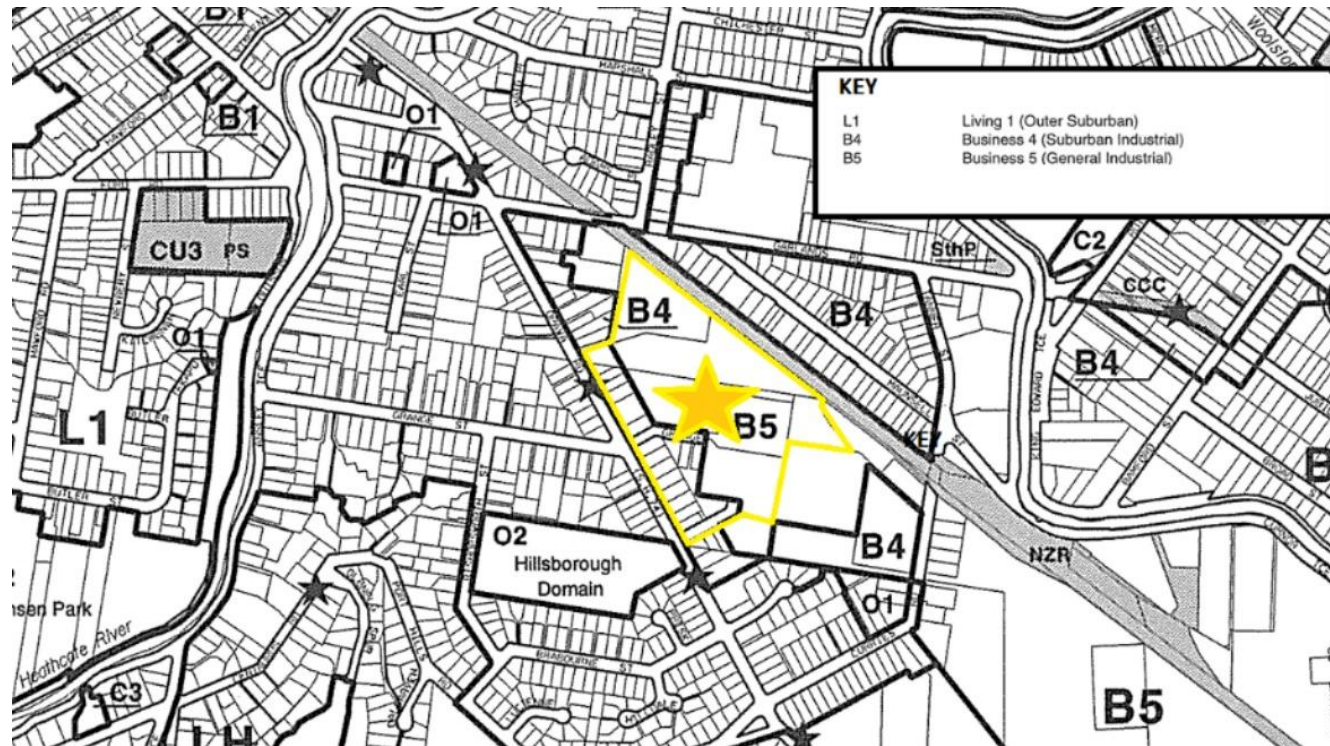


Figure 3: Zoning Map from the 1995 Christchurch City Plan maps showing WWB's Opawa Road site outlined in yellow and depicted by a star. *Source:* <http://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Historic-Plans/Christchurch/1995-Notified-Christchurch-City-District-Plan-Planning-Maps.pdf>. *Annotated by* RMG March 2025

: Zoning Map from the 1995 Christchurch City Plan maps showing WWB's Opawa Road site outlined in yellow and depicted by a star. **Source:**<http://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Historic-Plans/Christchurch/1995-Notified-Christchurch-City-District-Plan-Planning-Maps.pdf>. **Annotated** by RMG March 2025

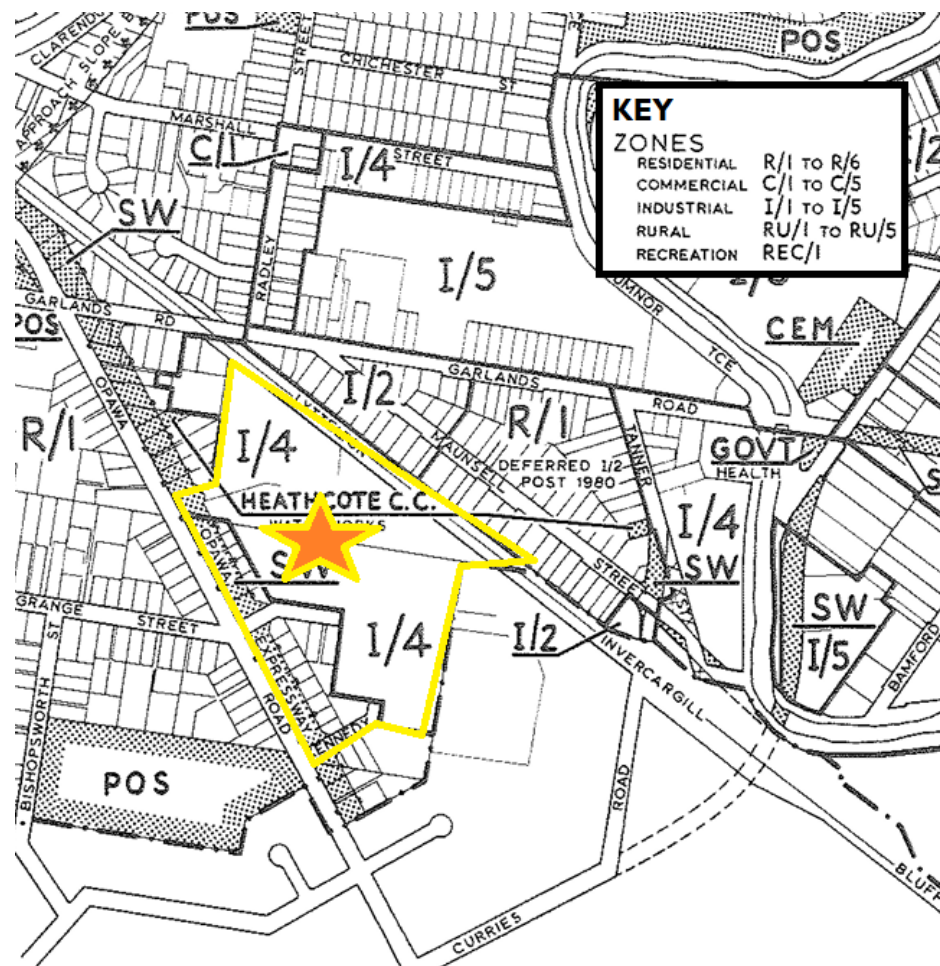


Figure 5: Zoning Map from the 1972 Christchurch City Plan maps showing WWB's Opawa Road site outlined in yellow and depicted by a star. *Source:* <https://ccc.govt.nz/the-council/plans-strategies-policies-and-bylaws/plans/christchurch-district-plan/districtplans/historic-plans> *Annotated by RMG March 2025*

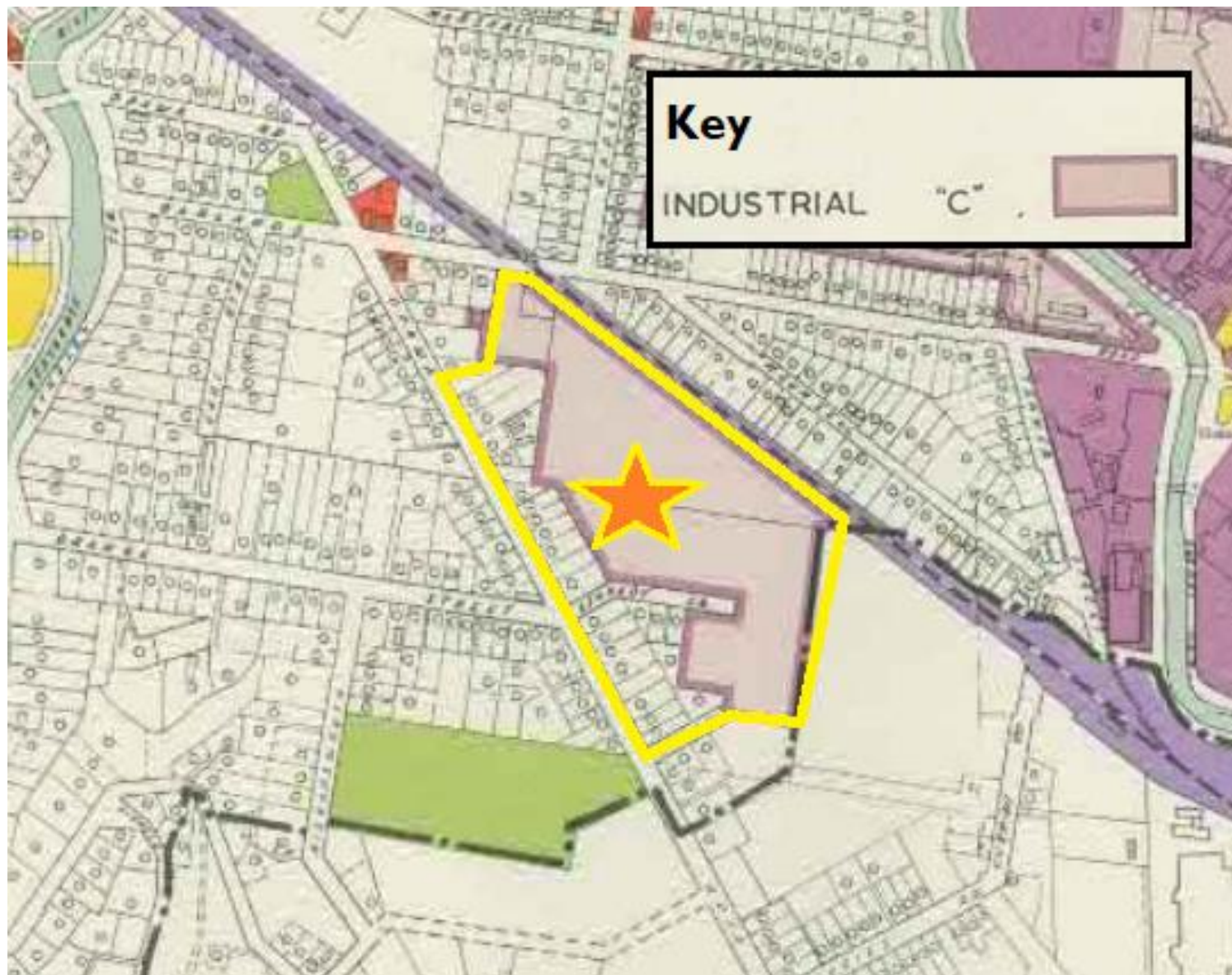


Figure 6: Zoning Map from the 1962 Christchurch City Council District Planning Scheme Zoning maps showing WWB's Opawa Road site outlined in yellow and depicted by a star.

Source: chromeextension://efaidnbmnnnibpcajpcqlclefindmkaj/https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Historic-Plans/Christchurch/1962-Operative-Christchurch-District-Planning-Scheme-Planning-Maps.pdf

Annotated by RMG March 2025

APPENDIX B**Detailed Feedback Relief on Draft Plan Change 20: Industrial Interface****Feedback Name: Winstone Wallboards Ltd**

Relevant Chapter/section of Draft Plan Change 20	Specific provision / matter	Position	Reason for feedback	Relief sought
Site zoning	Industrial Heavy Zone and Industrial General Zone	Support retention of the operative zoning	WWB's site has been zoned 'Industrial' for over 60 years and has been ratified through various iterations of the District Plan through full plan reviews and subsequent plan changes. Therefore, the site has a history of providing for Industrial activity and should maintain the level of activity that the industrial zoning intends.	Maintain the Industrial Heavy Zone and Industrial General Zone.
Definitions	Heavy industrial activities	Oppose	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. In addition this proposed change does not align with the operative Canterbury Regional Air Plan 2017.	Retain the operative definition of 'Heavy industrial activities' clause g. and reject the drafted amendments that seeks to reduce the net heat /electrical output as follows: g. any other processes involving fuel-burning equipment, <u>which individually or in combination with other equipment, have a fuel burning rate of up to 1000 kg/hr that have a net heat or electrical energy output of 40kW or more;</u> OR, replace the existing definition with the definition contained in the Wellington City Plan as follows: <i>'Heavy Industrial Activity' '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>
Definitions	Machinery	Oppose	WWB considers 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.	Delete the new definition for 'machinery' <u>mechanical or electrical devices, equipment or systems used in industrial activities that produce noise and/or vibrations through their operations.</u>
Industrial Zone Objectives	16.4.3 Objective: Effects of industrial	Oppose	WWB considers that amendments Objective 16.4.3 (should be numbered 16.2.3) is a substantial departure from overall intent of the zone and does not provide support for industrial activities and will give rise to further reverse sensitivity limitations on existing lawfully activities within the zone.	Delete amendments as drafted and retain the operative wording for Objective Effects of industrial activities as follows

Relevant Chapter/sec tion of Draft Plan Change 20	Specific provision / matter	Position	Reason for feedback	Relief sought
	activities			a. ~~To provide for industrial activities in a way that supports~~ <i>Adverse effects of industrial activities and development on the environment are managed to support the anticipated outcome for the industrial zone while recognising that sites adjoining an industrial zone will not have the same level of amenity anticipated by the Plan as other areas with the same zoning managing adverse effects on the environment and significant adverse amenity effects on adjoining zones.</i> b. ~~To improve the amenity of industrial sites at the~~ <i>ensure the interface with residential zones over time as industrial sites are redeveloped or where land uses change.</i> c. ~~To increase tree canopy cover in industrial zones in appropriate locations to enhance public health, wellbeing and amenity within and beyond the zone.~~ d. ~~b.~~ The cultural values of Ngāi Tahu/ mana whenua are recognised, protected and enhanced through the use of indigenous species in landscaping and tree planting, a multi-value approach to stormwater management in greenfield areas, low impact urban design, and the protection and enhancement of wāhi tapu and wāhi taonga including waipuna.
Industrial Zone Policies	16.4.3.2 Policy – Managing effects on the environment	Oppose	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. 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.	Seeks that either Clause b of Policy 16.4.3.2 is retained as per the operative wording: b. <u>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.</u> OR That clause iii. Is deleted from the draft working as follows: ~~b. Where an industrial zone adjoins a residential zone, manage industrial activities and their effects on residential amenity (including health, safety and privacy of residents) in a way that:~~ i. <u>avoids significant adverse effects;</u> ii. <u>appropriately mitigates other adverse effects; and</u> iii. ~~improves residential amenity as the industrial zone is redeveloped or activities change.~~
Rules	Rules 16.4.2.1 & 16.5.2.1 Maximum Building Height	Oppose	WWB considers this new clause b. requiring that a <u>Maximum height of any building between 20 and 200 metres of a residential zone shall be 20 metres.</u> Is overly onerous and the operative 15m height restriction within 20m of a residential zone sufficiently manages the effects of height.	Delete clause b. and retain operative maximum height rule. a. The maximum height of any building within 20 metres of a residential or rural zone shall be 15 metres. b. ~~Maximum height of any building between 20 and 200 metres of a residential zone shall be 20 metres.~~ c. Any application arising from this rule shall not be publicly notified.

Relevant Chapter/section of Draft Plan Change 20	Specific provision / matter	Position	Reason for feedback	Relief sought
Rules	Industrial Heavy Zone Permitted Activities P3 – Heavy Industrial activities	Oppose	The new activity specific standard requirements that heavy industrial activity need to be greater than 200m from a residential zone to be a permitted activity would capture almost the entirety of WWB's site. The result of this new standard would require any heavy industrial activity located on a site with any portion of the site that is within 200m of a residential zone, triggering a restricted discretionary activity consent. WWB considers that this is misaligned with the zone intent.	Delete the activity specific standard as follows and retain the operative permitted standard with nil activity standard requirements for Heavy Industrial activities. ~~a. Shall be located at least 200m from any residential zone boundary.~~
Standards	16.4.2.10 & 16.5.2.9 Use of heavy vehicles and machinery adjoining residential zones	Oppose	These new standards 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 the term 'machinery'. These standards are 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.	Delete both standards (industrial general zone) and 16.5.2.9 (industrial heavy zone) ~~16.4.2.10 Use of heavy vehicles and machinery adjoining residential zones~~ ~~a. For sites with a vehicle access adjoining a residential zone, the maximum number of vehicle trips for heavy vehicles using this vehicle access shall be 60 per day. b. For sites adjoining a residential zone, there shall be no heavy vehicles or machinery operating outdoors between the hours of 2200 and 0700. c. Any application arising from this rule shall not be publicly notified.~~ ~~16.5.2.9 Use of heavy vehicles and machinery adjoining residential zones~~ ~~a. For sites with a vehicle access adjoining any residential zone, the maximum number of vehicle trips for heavy vehicles using this vehicle access shall be 60 per day.~~ ~~b. b. For sites adjoining a residential zone, there shall be no heavy vehicles or machinery operating outdoors between the hours of 2200 and 0700.~~ ~~c. c. Any application arising from this rule shall not be publicly notified.~~
Standards	16.4.2.6 Landscaped areas – General Industrial Zone	Oppose	WWB considers the additional landscaping requirements under clause v. which requires additional planting within an industrial site is overly onerous and is not functionally practical and therefore is contrary to Policy 16.4.3.2.	Delete clause v. ~~For every 500m² of net site area, a minimum of one medium sized tree shall be planted within the site.~~

Relevant Chapter/sec tion of Draft Plan Change 20	Specific provision / matter	Position	Reason for feedback	Relief sought
Matters of Discretion	Rule 16.7.1.11 Use of heavy vehicles and machinery adjoining residential zones	Oppose	Consequential change from the deletion of standards 16.4.2.10 & 16.5.2.9	Delete rule 16.7.1.11 and associated matters of discretion ~~Rule 16.7.1.11 Use of heavy vehicles and machinery adjoining residential zones~~ ~~a. In relation to use of heavy vehicles and machinery between 2200 and 0600 hours:~~ ~~i. The impact of the noise level generated, location, frequency, duration, intensity and any special audible characteristics of the vehicles and machinery on the anticipated amenity of residential sites, including but not limited to the protection of sleep.~~ ~~ii. The effectiveness of any mitigation measures, including but not limited to reduction of noise at source, alternative techniques or machinery which may be available, insulation or enclosure of machinery, acoustic fencing and the management of outdoor areas.~~ ~~b. In relation to the number of heavy vehicle movements exceeding 100 per day:~~ ~~i. The extent to which any additional heavy vehicle movements will result in adverse effects on the anticipated amenity of residential sites due to noise, vibration, dust, nuisance, glare and fumes.~~ ~~ii. The extent to which any additional heavy vehicle movements will result in any adverse effects on the safety and efficient functioning of the road network.~~ ~~iii. The effectiveness of any mitigation measures.~~
Matters of Discretion	16.7.2.6 for Outdoor storage of materials	Oppose	WWB considers that there is already a level of expectation under the existing provisions that the amenity values at the interface a reduced and therefore to ensure consistency with the existing lawfully established operations, this should be recognised in the matters of discretion.	Amend matter of discretion clause f, 16.7.2.6 by deleting the word ‘anticipated’ and replace with ‘existing’ as follows: f. The extent to which the ~~anticipated~~ existing amenity values of residential sites may be adversely affected by the location, height and nature of stacked materials and the frequency and methods of handling and moving the materials.
Matters of Discretion	16.7.2.6 Interface with residential zones	Oppose	WWB considers that the matters of discretion places unrealistic expectations for residential activities that the residential amenity will be raised through further industrial activity. The cost implications for both the increased consenting requirements, in addition to further mitigation measures that the matters of discretion are seeking have not been justified or assessed and is not considered the most efficient and efficient way of achieving the purpose of the Resource Management Act 1991.	Delete 6.7.2.6 Interface with residential zones as follows: ~~16.7.2.6 Interface with residential zones~~ ~~a. The extent to which the activity will result in adverse effects in terms of visual impact, noise, vibration, dust, nuisance, light spill, glare, fumes, outlook, sunlight access, privacy, odour, traffic movements including heavy vehicles, that are incompatible with the anticipated amenity values of residential sites.~~ ~~b. The extent to which the nature and scale of the operation is compatible with, and maintains, anticipated residential character and amenity values of residential sites.~~ ~~c. The extent to which the anticipated amenity values of residential sites may be adversely affected by the location, height and nature of stacked materials and the frequency and methods of handling and moving the materials.~~ ~~d. The extent to which the activity will cause or exacerbate reverse sensitivity effects on the industrial zone.~~ ~~e. The effectiveness of any mitigation measures including landscaping, acoustic attenuation, screening, site layout and limits on hours of operation.~~
District Wide	Chapter 6.1 Noise	Oppose	WWB considers that there is no sound planning basis for the amended direction of the Policy 6.1.2.1.1 and Rule 6.1.4.1 and acoustic expert	Delete clause iii of Policy 6.1.2.1.1 and retain Rule 6.1.4.1 as contained in the operative plan as follows:

Relevant Chapter/section of Draft Plan Change 20	Specific provision / matter	Position	Reason for feedback	Relief sought
Provisions	Policy 6.1.2.1.1 and Rule 6.1.4.1		assessment needs to be provided to be able to fully understand the nature and scale of change these changes will result in.	6.1.2.1.1 Policy - Managing noise effects a. Manage adverse noise effects by: i. limitations on the sound level, location and duration of noisy activities; ii. requiring sound insulation for sensitive activities or limiting their location relative to activities with elevated noise levels.; and ~~iii. Applying the provisions of NZS 6802 for Special Audible Characteristics where noise generated in industrial zones is received within residential zones.~~ ~~6.1.4 General Noise Rules 6.1.4.1 Measurement and assessment of noise~~ a. Unless otherwise specified elsewhere in this District Plan, noise shall be measured in accordance with NZS6801:2008 “Acoustics – Measurement of environmental sound”, and assessed in accordance with NZS 6802:2008 “Acoustics-Environmental noise”, except that provisions in NZS 6802 referring to Special Audible Characteristics shall <u>not be applied only apply within residential zones where the noise received is generated within industrial zones.</u>



Christchurch, Nelson,
Dunedin, and Whangārei
Postal address:
PO Box 1845,
Christchurch 8140

Our Reference: J15238

31 March 2025

Christchurch City Council
PO Box 73016
CHRISTCHURCH 8154

Email: LetsTalk@ccc.govt.nz

cc: Sarah Oliver sarah.oliver@ccc.govt.nz

Dear Sir / Madam

Draft Plan Change 20 (Industrial Plan Change) – Feedback from Waltham 67: Statement of Intent

On 24 February 2025, Christchurch City Council (**Council**) publicly invited feedback on the Draft Plan Change 20 (Industrial Plan Change) (**PC20**).

Waltham 67 Limited (**Waltham 67**), as the owner and occupier of the industrially zoned land at 67 Waltham Road within the City (as discussed further below), welcomes this opportunity to provide feedback. As discussed with Council Officers on 12 March 2025 this feedback also forms a 'Statement of Intent' to request that the site at 67 Waltham Road be rezoned from Industrial General to **Residential Medium Density** within the notified PC20.

Planz Consultants Limited (**Planz**), who assist Waltham 67 with its policy work under the Resource Management Act 1991 (**RMA**), has prepared this feedback on Waltham 67's behalf. It is noted that Planz has also assisted other industrial landowners, which are potentially impacted by PC20, and have raised a number of general concerns with the principles associated with Plan Change 20.

67 Waltham Road

The site is legally described as Pt Lot 1 DP 46111 and has a site size of 1.21Ha. The site currently contains PACT Group (plastics) and supporting regional discharge consents CRC054039 and CRC962075.

The site is zoned Industrial General within the Operative District Plan, has direct frontage to Waltham Road (minor arterial) and Hume and Austin Streets (local roads),

The site directly interfaces with the Residential Medium Density zone to the east and west, and as separated by road reserve to the north and south (Figure 1). Accordingly, the site represents an isolated block of General Industrial zone surrounded on all sides by residential zoning, and would be subject to considerable restraints on further development were PC20 to be enacted in the manner incorporated in the draft Plan Change.

Figure 1: 67 Waltham Road



This correspondence is to provide a **Statement of Intent** that Waltham 67 seek that the Christchurch City Council notify Plan Change 20 inclusive of a zone change for this site from Industrial General to Medium Density Residential. It is considered that:

- Residential rezoning is an appropriate mechanism to address the purpose of PC20 which seeks to reduce incompatible effects between residences and adjoining industrial zones.
- The Council's capacity modelling (in accordance with NPS-UD requirements) identifies that there is no scarcity of Industrial zoned land within Christchurch City that would otherwise warrant the retention of this 1.2ha block.
- Rezoning to enable residential activities would be compatible in both amenity and form with the surrounding environment, would not generate vehicle movements that would not be able to be accommodated on the surrounding transport network, and modal choice would be supported by public transport active on Waltham Road.
- Known matters of soil contamination (A17 – Storage Tanks, DSI dated Dec 2017) would be able to be resolved through the consenting phase (including application of the NES-Contamination).

It is advised that a suitable Section 32 assessment providing additional details on the above will be provided to the City Council in advance of PC20 to support the rezoning.

PC20 General Comment

Overview

There is concern that the purpose, and significant resource management issues to be addressed by the Plan Change are not adequately expressed.

Whilst, the restrictions associated with height restriction on outdoor storage and improvements in the clarity of a number of provisions would be supported, the remaining provisions as amended are considered 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.

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. 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.

It is considered that the Plan Change as currently drafted risks institutionalising reverse sensitivity constraints on established industrial areas, and accordingly 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].

Specific Matters

Matter	Discussion
Amendments to Objective 16.4.3	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.
Amendments to Policy 16.4.3.2	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 '<i>improve residential amenity</i>' is opposed for the reasons expressed above as to 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 '<i>improve</i>' through the resource consent process.

Noise Definition of Machinery	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 as identified below are considered inappropriate and should also be removed.
Policy 161.2.1.1(a)(iii) / Measurement of Noise Rule 6.1.4.1	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. Accordingly, a more appropriate approach is to 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
Rules 16.4.2.10, 16.5.2.9, 16.6.2.9 ‘For sites adjoining a residential zone, there shall be no heavy vehicles or machinery operating outdoors between the hours of 2200 and 0700’.	The insertion of these rules precludes mechanical ventilation, refrigeration, use of machinery – even when compliant with the Noise Rules. 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.
Landscaping	The approach to landscaping is incongruent 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 is considerably more onerous than the landscaping requirements for commercial 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.

Conclusion

Waltham 67 thanks the Christchurch City Council for the opportunity to provide feedback, prior to the need for formal submissions on a notified Plan Change 20.

Waltham 67's primary relief would be resolved through amending the zoning of 67 Waltham Road from Industrial General to Residential Medium Density, and has instructed Planz consultants to engage with Council Officer's to provide to the Council an appropriate and targeted Section 32 analysis such that PC20 can notify this amendment.

In addition, Waltham 67 as a responsible landowner of Industrial properties within Christchurch City has raised a number of concerns with PC20 as drafted. Waltham 67 respectfully requests that the Council consider 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. 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.

Yours sincerely

PLANZ CONSULTANTS LTD

A handwritten signature in blue ink, appearing to read 'Matt Bonis', with a stylized flourish underneath.

Matt Bonis

Consultant Planner (Partner)

Phone: 021 79 66 70

Email: matt@planzconsultants.co.nz

cc: Jonathan Lyttle, Director Waltham 67.
jonathan@citadel.nz



Christchurch, Nelson,
Dunedin, and Whangārei
Postal address:
PO Box 1845,
Christchurch 8140

Our Reference: J17606

31 March 2025

Christchurch City Council
PO Box 73016
CHRISTCHURCH 8154

Email: LetsTalk@ccc.govt.nz

cc: Sarah Oliver sarah.oliver@ccc.govt.nz

Dear Sir / Madam

Draft Plan Change 20 (Industrial Plan Change) – Feedback from CERES: Statement of Intent

On 24 February 2025, Christchurch City Council (**Council**) publicly invited feedback on the Draft Plan Change 20 (Industrial Plan Change) (**PC20**).

CERES New Zealand LLC (CERES), are the owner and occupier of the industrially zoned land at 20 Blakes Road, and 76 Factory Road, Belfast within the City (as discussed further below). CERES welcomes this opportunity to provide feedback.

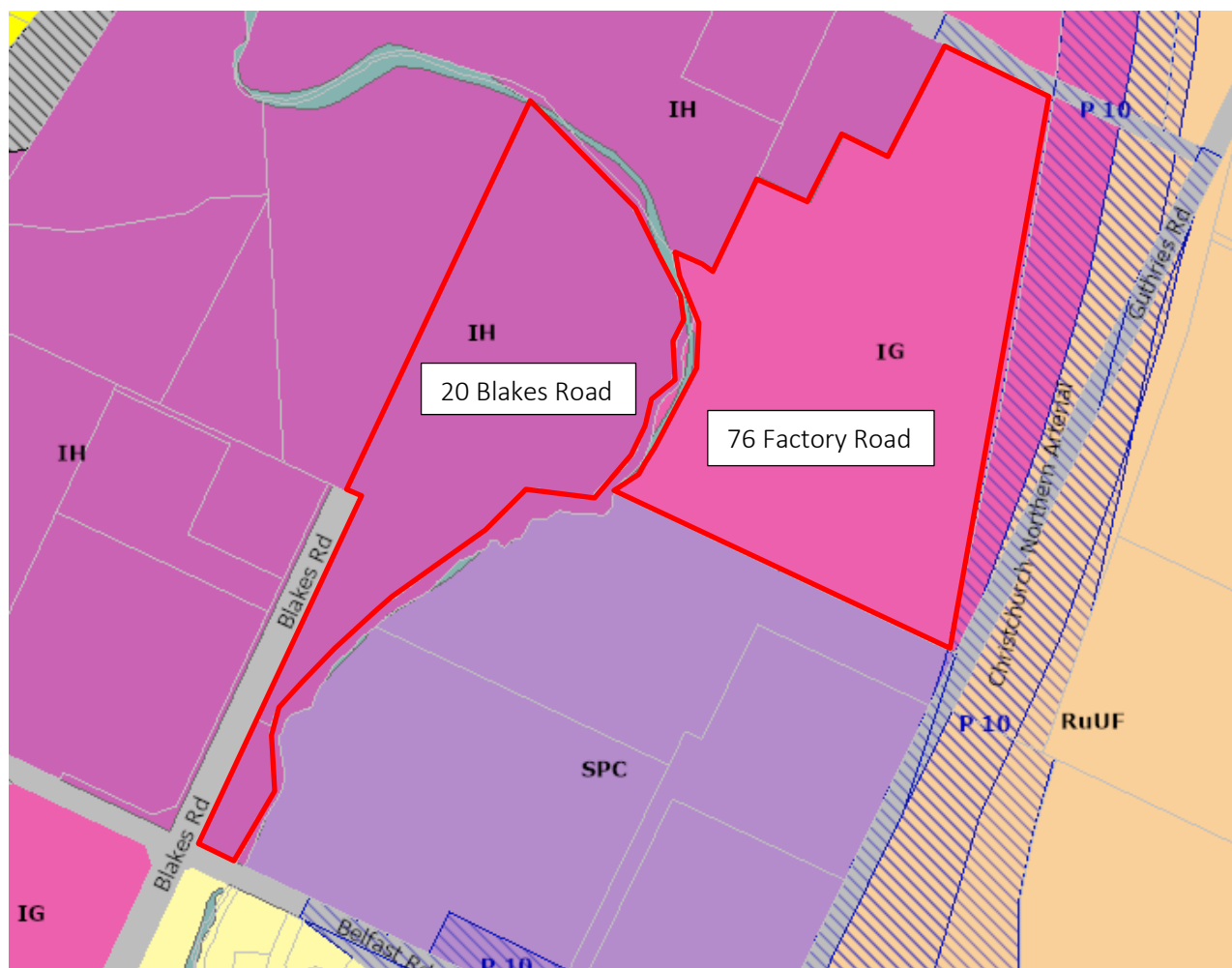
Planz Consultants Limited (**Planz**), who assist CERES with its policy work under the Resource Management Act 1991 (**RMA**), has prepared this feedback on CERES' behalf. It is noted that Planz has also assisted other industrial land owners, which are potentially impacted by PC20, and have raised a number of general concerns with the principles associated with Plan Change 20.

20 Blakes Road and 76 Factory Road

The site at 20 Blakes Road is legally described as Lot 55 DP 644 and has a site size of 4.33Ha and is zoned Heavy Industrial within the Operative District Plan. It has access to Blakes Road and Belfast Road. It interfaces with the Residential New Neighbourhood zone to the south, albeit it is separated by road reserve (Figure 1). The proximity of residential zoned land and the existing road network would be subject to considerable restraints on further development were PC20 to be enacted in the manner incorporated in the draft Plan Change.

The site at 76 Factory Road is legally described as Section 9-10 Survey Office Plan 490396 and has a site size of approximately 7.2Ha and is zoned Industrial General. The site adjoins the Christchurch Northern Arterial along its eastern boundary.

Figure 1: 20 Blakes Road and 76 Factory Road



PC20 General Comment

Overview

There is concern that the purpose, and significant resource management issues to be addressed by the Plan Change are not adequately expressed.

Several of the provisions as amended are not considered 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.

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. 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.

It is considered that the Plan Change as currently drafted risks creating reverse sensitivity constraints on established industrial areas, and accordingly 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**]. It is noted that Council approved an intensive older person housing development to the south of CERES's 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.

Specific Matters

Matter	Discussion
Amendments to Objective 16.4.3	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 create 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 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.
Amendments to Policy 16.4.3.2	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 '<i>improve residential amenity</i>' is opposed for the reasons expressed above as to 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 '<i>improve</i>' through the resource consent process.

Noise • Definition of Machinery	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 as identified below are considered inappropriate and should also be removed.
• Policy 6.1.2.1.1(a)(iii) / Measurement of Noise Rule 6.1.4.1	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. Accordingly, a more appropriate approach is to 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
• Rule 16.5.1.1 P3 Heavy industrial activity – shall not be located at least 200m from any residential zone boundary.	This rule risks creating reverse sensitivity constraints on established heavy industrial areas.
• Rules 16.4.2.10 and 16.5.2.9 a. For sites with a vehicle access adjoining a residential zone, the maximum number of vehicle trips for heavy vehicles using this vehicle access shall be 60 per day. b. For sites adjoining a residential zone, there shall be no heavy vehicles or machinery operating outdoors between the hours of 2200 and 0700.	Given the extensive definition of ‘machinery’ as sought to be inserted under PC20, these proposed rules would preclude mechanical ventilation, refrigeration, use of machinery – even when compliant with the Noise Rules. The proposed rule is inappropriately targeted to apply to all outdoor machinery <u>on any part of a site</u>, 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

c. Any application arising from this rule shall not be publicly notified.	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.
Rules 16.4.2.6 and 16.5.2.6 Landscaped areas	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 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.
Activities	The amendments to the activity status of Ancillary Retail to remove 'storage' and a change in status to Residential / Health/ Visitor Accommodation / Education for Discretionary to Non-Complying is opposed within the Industrial General zone. 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 Resource Management Act 1991.

Conclusion

CERES thanks the Christchurch City Council for the opportunity to provide feedback, prior to the need for formal submissions on a notified Plan Change 20.

The response provided has raised a number of concerns with PC20 as drafted. CERES respectfully requests that the Council consider 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.

Yours sincerely

PLANZ CONSULTANTS LTD

A handwritten signature in blue ink, appearing to read 'T. Joll'.

Tim Joll

Consultant Planner (Partner)

Phone: 022 171 1529

Email: timj@planzconsultants.co.nz

cc: Swaroop Gowda, Director of Operations, CERES
swaroop.gowda@ceresnz.co.nz

29th March 2025

Christchurch City Council

To Whom it May Concern

Early Feedback to Plan Change 20

Metalcorp NZ Ltd is a family owned and operated metals recycling business situated at 615 Halswell Junction Road, Hornby, Christchurch. We have been operating since 1989 and currently employ 32 staff at our Hornby site. We provide an essential service to Canterbury for the recycling of ferrous and non-ferrous metals which allows for vast amounts of materials to be diverted from landfill.

We are keen to provide feedback on Plan Change 20 as we are concerned that metal recycling facilities have been repeatedly and unreasonably highlighted as the need for a District Plan change.

From the review of information that has been made publicly available to us via the Christchurch City Council(CCC) website, and through our industry body, The New Zealand Association of Metal Recyclers (AMR) we believe that metal recyclers have been unjustly singled out and we question the information that is being used to justify the proposed changes to the District Plan under Plan Change 20.

Our concerns are as follows:

1. The Justification for the Plan Change 20

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.

We would argue that to some degree, complaints from residential dwellings against commercial activities are inevitable, especially in areas where properties are near industrial zones. We believe it is important to note 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.

The council has cited 'frequent' complaints concerning noise, however, there has been little information supplied to detail if these complaints were upheld or not. 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. 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 we 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** (bold type added).*

Given this, we 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?

We 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.

2. The Appropriateness of Plan Change 20

Given the apparent lack of justification for Plan Change 20, we question whether Plan Change 20 is appropriate as a solution at all. Would better enforcement of CDP be a better first step? Additionally, shouldn't 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*. Why does Plan Change 20 propose taking a backward step in this regard?

Our other concern regarding the appropriateness of Plan Change 20 is 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.

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.

Where is the onus on developers to build more suitable housing when creating residential living spaces near existing industrial zones? Page 20 of the Acoustic Engineering Services Limited 'Industrial Residential Interface -Review of Potential Noise Issues' report, recognised that *'...noise levels exceeding the District Plan limits.....because it had more direct line of sight to industrial activities.....could be a justification for requiring new intensified residential dwellings to provide some level of sound insulation or be set back.'*

Why then is Plan Change 20 seeking for businesses to do this instead? 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.

3. Lack of Clarity for Existing Business & Restriction on Growth

As an existing metals recycling business, we are concerned about the impacts that Plan Change 20 will have on our operations, especially how the new changes will be applied to existing businesses is unclear.

The CCC website notes the following:

'The District Plan (including this plan change) cannot place new requirements or conditions on existing industrial activities, including those with resource consent. The council can only monitor and enforce compliance of existing activities under the current rules and standards or against resource consent conditions.'

We have concerns about the interpretation of the words *'under the current rules and standards'* -if Plan Change 20 is passed, it technically becomes the *'current rule'* and may therefore be applied to our existing business.

Additionally, when we meet with the CCC as a member of AMR, during discussions we were told that *any change* made to our existing operation may trigger the requirements of Plan Change 20 -a comment that is highly concerning for us. What does *'any change'* mean? Would upgrading a piece of plant or machinery qualify as a change?

As a vital Canterbury business, we would like to continue to grow our operations to enable us to employ more people and provide more services to our community, however there is no certainty for us to be able to do so, which is problematic for us and unfair to our employees and customers.

Reverse sensitivity issues need to be identified for what they are. 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 like ours 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 our communities.

4. Economic Impact

There are several requirements in Plan Change 20 that will negatively impact upon our business, these include:

- **Vehicle Movements**

During our meeting with the CCC as an AMR member, we queried the restriction proposed by Plan Change 20 of just 60 heavy vehicle movements per day.

We had assumed a vehicle movement was one vehicle going in and out of the site and were astounded to learn that both the in and out travel was counted, meaning that only 30 heavy vehicles could visit the site per day (!). 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, by the nature of what they do, must use heavy vehicles to move their materials and goods. For many businesses the restriction in trade will be devastating and is likely to result in closure impacting staff, customers and communities. We question the legality of the ability to restrict business trade in such a manner.

As we are situated in an Industrial Heavy Zone, our site will not be subjected to the heavy vehicle restriction, however as we deal with and rely on services from other business (e.g., container parks) who are in areas where this requirement will be imposed, we will none-the-less be impacted by it.

As an exporter it is highly likely this will have a significant effect on our ability to bring our product to market, and therefore the economics of our business will be threatened.

- **Use of Heavy Vehicles & Machinery**

Coupled with the restriction on heavy vehicle movements discussed above, 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. We 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.

- ***Outdoor storage of Materials***

Metal recycling requires the stockpiling of materials for processing. The volumes received in by our 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 we are unsure how this should be interpreted. Additionally, some of the materials we collect and process 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 we produce in our shredding operations takes us an average of 4-5 months to produce the necessary export volume.

We are also affected by external factors outside of our control that require us 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 our communities. This fails to acknowledge the contribution our industries make to our communities and fails to support the growth of them.

- ***Landscape Requirements***

Our Hornby location is approximately 1600m² -this would require us to plant 32 trees (!). As these trees grow, they will develop canopies that will restrict the operating space available to our business. Commercial industrial land is expensive to purchase and to maintain, therefore we need to maximise its use to ensure an economic return to the business for these costs.

We are also concerned about impact this will have on our ability to meet with the conditions of our groundwater release as we are working towards developing a fully covered site. Trees will require areas of our 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. As they grow trees will also have the potential to damage our sealed areas.

Numerous trees will also present a health and safety risk to our employees, many of whom suffer seasonal pollen allergies. Our site is also subjected to

strong Canterbury winds, and we have 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 our 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 we educate our communities to recognise a productive mess from a hazardous one, and better that the 'mess' is contained in our yards where it can be responsibly recycled then for it to be spread across our riverways and landscapes.

Thank you for taking the time to consider our early feedback.

We will be looking to quantify our economic impact further in preparation for the 'Notification of Change' stage of this process.

If you would like to discuss our feedback, please contact me directly on 021 482 286 or via email to korina@metalcop.co.nz

Kind regards

Korina Kirk
Director / General Manager



Calder Stewart Development Limited
Level 4, 2 Cathedral Square, Christchurch
PO Box 8356, Christchurch

28 March 2025

Christchurch City Council
PO Box 73016
CHRISTCHURCH 8154

Email: LetsTalk@ccc.govt.nz

cc: Sarah Oliver sarah.oliver@ccc.govt.nz

Dear Sir / Madam

Draft Plan Change 20 (Industrial Plan Change) – Feedback from Calder Stewart Development Limited

On 24 February 2025, Christchurch City Council (**Council**) publicly invited feedback on the Draft Plan Change 20 (Industrial Plan Change) (**PC20**).

Calder Stewart Development Limited (**CSDL**) is part of the Calder Stewart group, one of New Zealand's largest construction and industrial property ownership firms specialising in design-build for commercial, industrial, rural and public sectors. Calder Stewart has a considerable land portfolio within New Zealand, including Auckland (Drury South Crossing), Te Rapa & Titanium Business Park (Hamilton), Tauranga (Tauriko), Hornby (Hornby Quadrant), Rolleston (Izone), Dunedin (Carisbrook), Milburn (Millburn Quadrant), and Invercargill (Awarua).

Given its extensive property ownership of Industrially zoned land both within Christchurch District and throughout New Zealand, CSDL is also uniquely placed in terms of the considering the consequences associated with the proposed Draft Plan Change PC20.

Overview of Calder Stewart

Calder Stewart has a workforce of nearly 400 people across the South Island and their various divisions cover Development, Construction, Pre-Cast Concrete manufacture, Steel Fabrication, Reinforcing, Roofing, Distribution and Forestry.

Calder Stewart is a prominent organisation assisting the rebuilding and regrowth of Christchurch post the Canterbury Earthquake sequence and has for the last 20 years been a market leader in the design and development of industrial buildings in Christchurch.

Within Christchurch, Calder Stewart own and operate from considerable landholdings in Hornby and Southwest Christchurch as zoned Industrial General (IG) and Industrial Heavy (IH). Calder Stewart has invested heavily in supporting servicing and transport infrastructure as associated with its Industrial landholdings, and, given the general greenfield nature of its developments has delivered an appropriate amenity as associated with these 'working environments'. In most instances, Calder Stewart's property interests do not adjoin a residential interface.

CSDL has been involved in numerous iterations of the Canterbury Regional Policy Statement and Christchurch District Plan relating to Industrial land development. CSDL's business model is predicated on providing certainty for land development and consequential District prosperity and employment. Accordingly, CSDL is disappointed that PC20 appears to relitigate several matters that have been previously resolved.

PC20 General Comment

There is concern that the purpose, and significant resource management issues to be addressed by the Plan Change are not adequately expressed; that the draft provisions seek to introduce further uncertainty and transaction costs associated with industrial land development, and inappropriately constrain appropriate and anticipated industrial activities; and burden industrial land development with amenity expectations that are not commensurate with the purpose of the zone, or indeed equitable with commercial land development in Christchurch.

CSDL does 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.

CSDL considers that the Plan Change as currently drafted risks institutionalising reverse sensitivity constraints onto established industrial areas. Specifically, given the wide range of industrial activities in the City that are facilitated by CSDL, there is concerns 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.

CSDL considers that the draft PC20 will:

- Reduce land use efficiencies regarding the provision of Industrial land required to meet demand, increasing transaction and average land costs.
- Reduce the diversity, viability and comparative advantage of Industrial areas, particularly those that adjoin existing residential zones, reducing the opportunities for (re)development.

Specific Matters

Matter	Discussion
Amendments to Objective 16.4.3	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 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.
Amendments to Policy 16.4.3.2	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 '<i>improve residential amenity</i>' is opposed for the reasons expressed above as to 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 '<i>improve</i>' through the resource consent process.
Noise Section 2 - Definition of Machinery	The definition is unnecessary, and 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 as identified below are considered inappropriate and should also be removed.
Policy 6.1.2.1.1(a)(iii) / Measurement of Noise Rule 6.1.4.1	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 / lawful establishment of existing noise producing activities. The approach would increase uncertainty and would provide a pathway for enforcement action for existing activities, especially where complaints stem from residential sites far from the noise source. 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 as the application of a penalty for SACs would only be imposed on noise generated within Industrial zones. A more appropriate approach is to 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
Rules 16.4.2.10, 16.5.2.9, 16.6.2.9 <i>'For sites adjoining a residential zone, there shall be no heavy vehicles or machinery operating outdoors between the hours of 2200 and 0700'.</i>	Given the extensive definition of 'machinery' as sought to be inserted under PC20, these proposed rules would preclude mechanical ventilation, refrigeration, use of machinery – even when compliant with the Noise Rules. The proposed rule is inappropriately targeted to apply to all outdoor machinery <u>on any part of a site</u>, 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.
Landscaping (One tree / 500m²) Rule 16.4.2.6(v) and 16.5.2.6(vi)	The approach to landscaping is inconsistent with the purpose and expressed outcomes of the Industrial zones. 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. 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.
Landscaping (Road Frontage) • Rule 16.4.2.6(ii) and 16.5.2.6(ii)	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.
Activities	The amendments to the activity status of Ancillary Retail to remove 'storage' and a change in status to Residential / Health/ Visitor Accommodation / Education for Discretionary to Non-Complying is opposed within the Industrial General zone. The operative provisions are workable and provide for the merits of applications to be considered as subject to the requirements of s104 of the Resource Management Act 1991.

Conclusion

CSDL thanks the Christchurch City Council for the opportunity to provide feedback, prior to the need for formal submissions on a notified Plan Change 20.

CSDL 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.

CSDL consider 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. The concern for CSDL is the unintended consequences of the amendments which would decrease certainty of investment, increase transaction costs for (re)development, and reduce the diversity, viability and comparative advantage of Industrial areas in the City.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Weaver', with a stylized flourish at the end.

Mark Weaver

Project Director

Email: mark.weaver@calderstewart.co.nz

Evaluation of Options for 3 Springs Road, Hornby

Issue: Land at 3 Springs Road, Hornby, has the potential to be used for industrial activities that could result in land use conflicts between industry and immediately adjoining housing. This potential land use conflict needs to be managed to protect residential amenity and limit reverse sensitivity constraints on lawfully established businesses.

The subject land is currently zoned Industrial General zone. It is part of small spot zone on the south side of the Main South Road/ Springs Road corner, which consists of a service station, a car sales yard and our client's site which is used for offices associated with Versatile Buildings and Garages. The site currently contains a showhome village for Versatile Homes, a use that was established by way of resource consent in 1995¹. The site is constrained by restricted vehicle access due to its proximity to the Main South Road/Springs Road intersection.

As it stands, the site is therefore under-utilised industrially zoned land, with its suitability and attractiveness for industrial uses being constrained by the site's small size, access constraints and proximity to residential neighbours. Whilst the site is not well suited for industrial activities, it is possible that new industrial activities could establish and create new land use conflicts with existing established housing. Whilst Industrial General zones are intended to generally be compatible with more sensitive activities, issues do arise, as evidenced by the need for this Plan Change.

The characteristics of the site mean it meets the definition of a 'brownfield site' under the Operative District Plan², providing an opportunity to change the land use to residential, mixed-use, or commercial activities through resource consent. However, PC 20 presents an opportunity to rezone the land thereby avoiding the time, expense, and uncertainty associated with a resource consent application. If rezoned, any actual or potential land use conflicts associated with the boundary interface of industry and housing on the south side of Main South Road, would be reduced, thereby achieving the purpose of the plan change.

The site's boundary with the adjoining car sales yard would be managed according to the provisions of the respective industrial and residential zones, primarily through side boundary controls (such as setbacks and landscaping). The result of the rezoning would be a reduction in the number of properties subject to potential direct boundary conflicts, from five to one.

Any potential for reverse sensitivity effects on existing industrial businesses to the north of Main South Road, are capable of being managed through comprehensive site design, the natural separation provided by Main South Road, and restrictions on the establishment of new heavy industrial activities locating within 200m of the residential zone boundary. It is also important to note that several existing activities in the Industrial Heavy Zone, within 200 metres of the 3 Springs Road, are either non-industrial activities (such as bulk retail and car sales) or activities anticipated in the Industrial General Zone (automotive repair businesses).

¹ Historical aerials of the site indicate that it was used for residential purposes until the 1970s, when commercial style buildings appeared on site.

² Policy 16.2.2.1 (Brownfield site identification) and 16.2.2.2 (Brownfield redevelopment)

The following is an evaluation of the reasonably practicable options available to address the issue and consider the rezoning option. It concludes that rezoning to a residential zone, would be the most appropriate method for achieving the purpose of the plan change and the objectives and policies of the Christchurch District Plan, in particular those that seek a well-integrated pattern of development and a high-quality urban environment where conflicts between incompatible activities are minimised.

Option 1 - Status Quo	Option 2 – Proposed Plan Change	Option 3 – Rezone to RS (MDRZ under PC14)
Retain operative zoning and provisions. Rely on brownfield policy to support any land use change. Benefits - Minimal controls on industrial activities (requiring less compliance and transaction costs). - Provides land for small scale industrial businesses. Costs - Potential adverse effects on residential neighbours arising from industrial activities. - Potential for reverse sensitivity effects on permitted industrial activities from residential neighbours (complaints). - IG zoning disincentivises redevelopment and results in inefficient use of land which could otherwise provide improved outcomes (amenity and housing supply). - Transaction costs and uncertainty associated with needing to seek consent for land use change under the brownfield policy.	As per option 1 but with amendments to provisions to improve amenity outcomes and minimise land use conflicts. Benefits - As per Option 1. - Some potential improvement of interface if and when a change of use occurs. Costs - As per Option 1. Efficiency & Effectiveness This option is likely to be more efficient (overall benefits to costs) and slightly more effective than the status quo. It would be more effective for implementing objectives that seek a high-quality residential environment (Obj. 3.3.7 and 14.2.4) and the appropriate management of incompatible activities, primarily through zoning (Obj 3.3.14). The proposed amendments would also be more effective than the status quo at maintaining and supporting the function of industrial zones (Policy 16.2.1.4) and managing effects on the environment including on residential amenity of adjoining zones (Policy 16.2.3.2).	Benefits - Gain of small area of residentially zoned land (enabling more housing supply). - Enable more efficient use of land. - Enables redevelopment for uses more compatible with directly adjoining residential. - If MRZ zoning proceeds on adjoining land, this option would impose less restrictions on the development of these housing sites (i.e. the industrial interface qualifying matter limitation would be less, enabling three storey development). - No need for a resource consent to enable housing (less uncertainty and transaction costs). Costs - Loss of small area of industrially zoned land. - Potential for greater adverse effects on any future housing given proximity to industrial heavy (albeit mitigated by proposed new rules to limit heavy industry within 200m of residential zones).

Option 1 - Status Quo	Option 2 – Proposed Plan Change	Option 3 – Rezone to RS (MDRZ under PC14)
Efficiency & effectiveness As described in the rationale for PC20, the operative provisions have not been wholly effective in managing potential land use conflicts.		Efficiency & Effectiveness This option is more efficient and more effective than Options 1 or 2 particularly: Obj. 3.3.7 – a high-quality urban environment that is attractive to residents and businesses, increases housing development opportunities (particularly in suitable brownfield areas) and promotes the reuse and redevelopment of buildings and land. Objective 3.3.14 which seeks to control the location of activities to minimise conflicts between incompatible activities, primarily through zoning (our emphasis). When preparing plan changes, seek to minimise transaction costs and need for reliance on resource consent processes (Obj. 3.3.2).

Appendix A Planning History

Planning Applications

Application No	RMA/1995/1972
Address	
Type	Resource consents
Received Date	3 July 1995
Issued Date	3 August 1996
Status	Processing complete
Details	Application for non-complying activity to establish a retail showroom(display and sale of homes and accessory buildings) in terms of the Transiti - Historical Reference RES952225

Application No	RMA/1988/881
Address	
Type	Resource consents
Received Date	21 November 1988
Issued Date	22 November 1988
Status	Processing complete
Details	Dispensation granted for a shorter setback distance from the road frontage than is normally allowed in this situation. - Historical Reference RES94101830

Application No	RMA/1986/1062
Address	
Type	Resource consents
Received Date	1 October 1986
Issued Date	8 December 1986
Status	Processing complete
Details	Consent granted to erect a display cottage situated on land at Springs Road adjacent to an existing building display centre of which land is design - Historical Reference RES94101826

Christchurch City Council

Plan Change 20 Industrial Interface Plan Change – Pre-consultation Draft Provisions

Broad Themes of the Proposal

1. amendments to an industrial objective and policies to have clearer direction and to better manage the interface;
2. amendments to a noise policy and rule to take account of noise generated from industrial zones that have special audible characteristics (e.g. bangs, clangs and thumps), and how the noise is received over residential zones;
3. built form controls at the interface are proposed to be strengthened including a new height limit for outdoor storage, an amended building height limit, greater landscaping requirement and new controls on use of heavy vehicles and machinery outdoors;
4. amendment to the “heavy industrial activity” definition to include a broader list of activities such as metal recycling yards and concrete manufacturing;
5. a new 200m setback requirement for heavy industrial activities and container yards;
6. amendments to landscaping and road setback requirements to increase tree canopy cover; and
7. minor changes to rules to correct errors and improve clarity, efficiency and effectiveness, including allowing alternative acceptable solutions for water supply for firefighting and changing an activity status for residential activities within industrial zones.

Selwyn District Council Staff Feedback

In lieu of a prescribed format for feedback, the following table has been prepared and comments provided only where issues have been identified.

Location	Proposal	SDC Staff Comment
Page 1	The definition for Heavy industrial activity (d) <i>slaughtering of animals; storage, drying or preserving of bones, hides, hoofs or skins; tanning; and wool scouring;</i>	To correct a minor grammatical error, the spelling of hoofs should be amended to <u>hooves</u> . This change fits within the scope of PC20 as set out in the summary letter, to improve plan clarity.

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Selwyn District Council Staff Feedback

Page 3	Definition for machinery that applies in relation to Rule 16.4.2.10, 16.5.2.9 and Rule 16.6.2.9	This definition may be too narrow and inadvertently and/ or unduly capture 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.
Page 5	<i>Objective – Effects of industrial activities b. to improve the amenity of industrial sites at the interface with residential zones over time as industrial sites are redeveloped or where land use changes.</i>	Improvement of amenity is particularly subjective and not something specific that could be measured. The location (or where) the objective is to apply “<i>Industrial sites at the interface</i>” is also non-specific. If this objective is intended to only apply to sites within ‘the interface’ then it would be more helpful, and practical from a compliance perspective, to have these sites spatially identified within a precinct in accordance with the National Planning Standards (NPS). The objective to ‘improve’ amenity may also create issues where the existing receiving environment is reasonably good and requirement for further improvement may be unreasonable. SDC suggest it may be more appropriate to replace “<i>to improve</i>” with <u>enhanced amenity</u>, or something similar. It will be very difficult to assess the effectiveness of this objective going forward due to a lack of specificity around which aspects of amenity are to be improved and over what timeframe.
Page 7	<i>RD8 matters for discretion in relation to container yards on sites within 200m of a residential zone boundary (a) Interface with residential zones Rule 16.7.2.6</i>	RD8 (a) should be more specific on the matters for discretion that should apply in relation to amenity within the interface and be more directive in terms of what action is required to achieve the associated Objectives and Policies. It is unclear what aspect of the interface with residential zone is intended to be regulated by the provision in order to achieve the desired outcome (e.g. planting or vegetation density/ height/ permeability required, or perhaps the orientation or color of the containers relative to the adjoining residential zone).
Page 9	<i>16.4.2.5 Outdoor storage of materials</i>	Enhanced amenity where the industrial zone interfaces with the residential zone has been addressed through the proposed rule for the outdoor storage of materials. SDC notes that overall amenity of an industrial zone is also apparent from key transport connections, such as elevated overbridges and motorways (e.g. Springs Road/ Southern motorway vicinity), especially where the rear of industrial sites back on to that transport connection.

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		The overall amenity of the industrial zone could be improved by managing the outdoor storage of materials where they are visible from main arterial roads or through screening or fence permeability requirements.
Page 9-10	<i>16.4.2.6 Landscaped areas Reference to 'medium sized tree'(v.)</i>	It is not clear what is meant by 'medium sized tree'. It would be helpful to specify an anticipated maturity height for a tree rather than general reference to 'medium sized' (compared to a kauri, most trees might be considered medium height). It would also be helpful to set direction or parameters around the anticipated height at the time of establishing the planting. SDC notes that generally there is a lack of specificity around landscaping requirements.
General	<i>Multiple provisions that refer to 'residential zone' (or the interface with the residential zone). For example; 16.4.2.1 Maximum height for buildings (b) the maximum height of any building between 20 and 200 meters of a residential zone shall be 20 meters. Also applicable to other provisions, such as; 16.5.1.1 P3, 16.5.1.3 RD1 a.iii.& ix, RD3 a. and RD4 16.5.2.1 and other locations)</i>	It is unclear whether the rules referring to 'a residential zone', would apply to residential zones managed by another territorial authority. It would be helpful if this cross-boundary jurisdictional ambiguity is clarified. While not a concern at present, given the 200m interface proposal, there are residential zones 500m from CCC Industrial areas in the Springs Road/ Marsh's Road vicinity it may be important to have this clarity in the future due to the rate of growth within the vicinity of this location.
General	<i>References to industrial zone requirements that exist within 200m of a residential zone (the residential interface). In particular, R16.5.1.1 P3 (page 11 of the consultation document) requiring heavy industrial activities be located at least 200m from any residential zone boundary.</i>	SDC suggest that the 200m interface (buffer zone) may be better addressed through applying a precinct, in accordance with the National Planning Standards (NPS). As per the NPS, a precinct spatially identifies and manages an area where additional place-based provisions apply to modify or refine aspects of the policy approach or outcomes anticipated in the underlying zone. The provision R16.5.1.1 P3 may be particularly problematic where a site straddles the 200m setback, and where the heavy industrial activities (as identified within the definition) can be located in a compliant location on a site, but other associated activities will still occur.
General	Objectives, and provisions that apply to hours of operations/ vehicle movements.	The objectives that apply to the industrial zone need to sit comfortably together and provide sufficient protection for industrial activities.

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		Existing industrial businesses such as bakeries, or similar may also struggle to operate within the proposed timing regulation and pose an inherent tension with 16.2.1 Recovery and growth objective and meeting the needs of industrial activities <i>“to avoid the need for industrial activities to locate in non-industrial zones”</i>. SDC note that in both the proposal and existing Industrial chapter the wording/ language used is fairly mild/ permissive (<i>recognizing and providing for, or effects are to be managed</i>) in contrast to applying ‘avoid’ policies to protect the functional requirements that apply to industrial activities. It is the prerogative of CCC to apply whatever policy settings it sees fit, however 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.
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25 March 2025

Christchurch City Council
City Planning Team
PO Box 73012
Christchurch 8154

By email to: planchange@ccc.govt.nz

COMMENTS ON DRAFT CHRISTCHURCH CITY COUNCIL PLAN CHANGE 20 - INDUSTRIAL

NAME OF SUBMITTER: KiwiRail Holdings Limited (KiwiRail)

ADDRESS FOR SERVICE: Level 1
Wellington Railway Station
Bunny Street
PO Box 593
WELLINGTON 6140

Attention: Sheena McGuire

Ph: 027 227 7780

Email: environment@kiwirail.co.nz

KiwiRail feedback on Draft Christchurch City Plan Change 20 - Industrial

KiwiRail Holdings Limited (KiwiRail) is the State-Owned Enterprise responsible for the construction, maintenance, and operation of the national railway network. This includes managing railway infrastructure and land, as well as rail freight and passenger services within New Zealand. KiwiRail is also the Requiring Authority for land designated for 'Railway Purposes' (or similar) in District Plans throughout New Zealand.

KiwiRail's national railway network (which comprises of 3,700km of track, over 200 locomotives, 18,100 hectares of land and 1,350 modern and heritage buildings)¹ is a nationally and regionally significant infrastructure asset. The rail network is critical to the safe and efficient movement of freight and passengers throughout New Zealand, and forms an essential part of the national transportation network and the wider supply chain. New Zealanders have invested significantly in the rail network and it is a critical public asset.

¹ Half Year Annual Report 2022 and Unaudited Financial Statements for the Six Months Ended 31 December 2021 (KiwiRail, 2022) at page 5.



The Main North Line, Main South Line and Hornby Branch Line are all designated rail corridors that extend through Christchurch City and are a key part of the KiwiRail network nationally. KiwiRail seeks to protect its ability to operate, maintain and upgrade rail infrastructure within Christchurch into the future.

To achieve this, KiwiRail encourages land uses near the railway corridor that do not compromise the short or long-term ability to operate a safe and efficient rail network, both day and night. Where sensitive activities are proposed on land near the railway corridors, appropriate controls should be imposed to ensure the long-term safety and amenity of sensitive activities. Associated with that is the risk of objections and complaints leading to restraints on the operation, maintenance and enhancement of the rail corridor. Safety is a key concern for KiwiRail so ensuring there are appropriate setbacks in place is critical.

Comments on key matters are provided below. KiwiRail is available to meet with the policy team to discuss any elements of the feedback provided.

Setbacks

Rule 16.4.2.2(a)(iii), 16.5.2.2(a)(iii), 16.6.2.3(a)(v)

KiwiRail strongly supports retention/no change to these provisions which require a 4m setback from the rail corridor boundary for buildings, balconies and decks on sites adjacent to the rail corridor.

Rail setback non-compliance notification to KiwiRail

Rules 16.4.2.2(c), 16.5.2.2(c), 16.6.2.3(c)

KiwiRail objects to the proposed amendment to the above provisions which removes the requirement to limited notify KiwiRail for breaches to the 4m rail corridor setback rule. KiwiRail 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).***

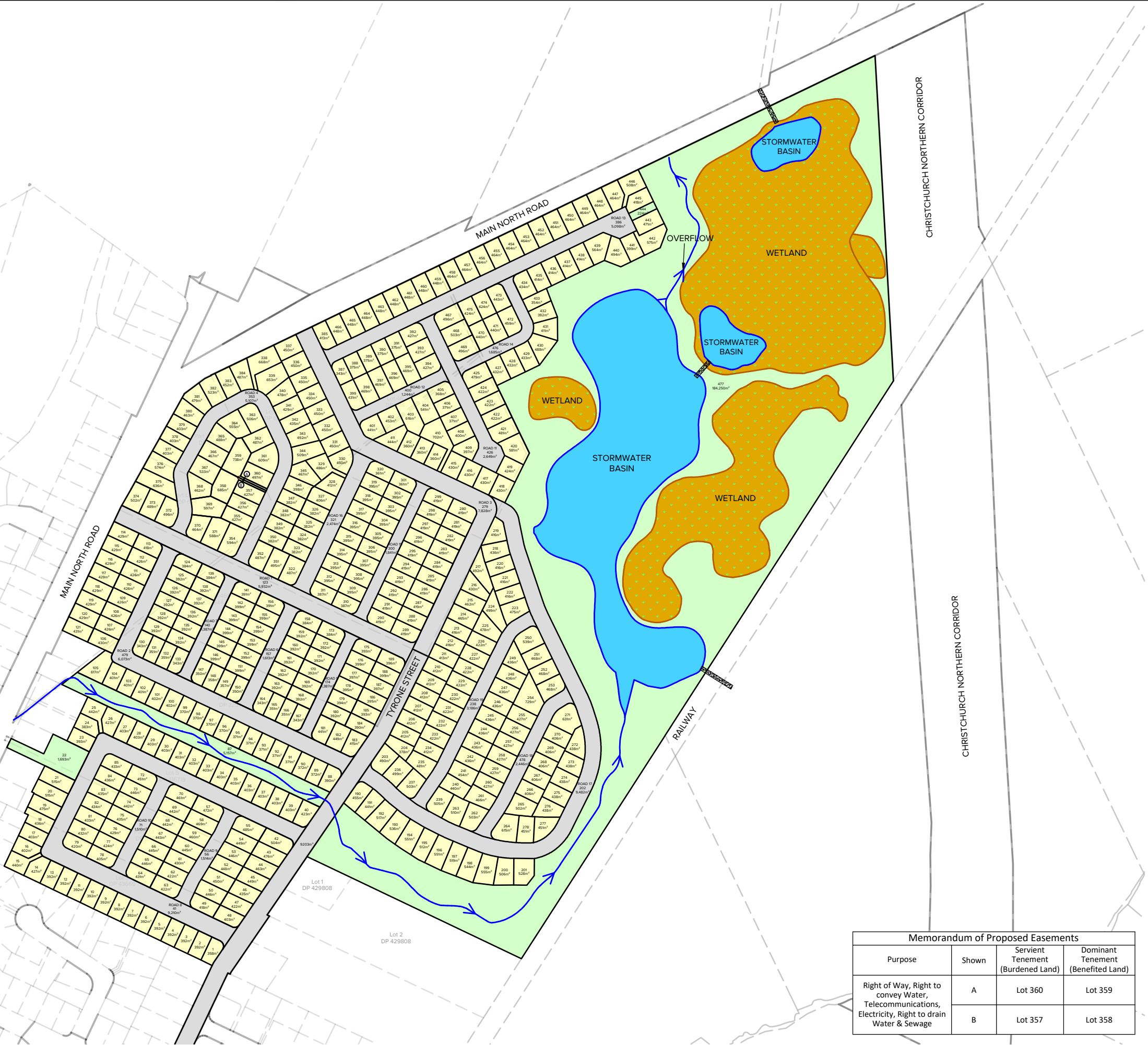
While noting s77D RMA, the above wording provides the opportunity for KiwiRail to assess breaches on a case-by-case basis and provide written approval where appropriate and similar wording is used in district plans throughout the country. This notification step is crucial for KiwiRail to assess applications 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. I include an example picture below where a residential apartment building was approved and constructed next to a rail designation without consultation with KiwiRail. A noise wall was required to be retrofitted to protect residents from noise, completely blocking outlook from lower floors.



KiwiRail wishes to prevent undesirable outcomes such as the example above, and continue to be notified of setback breach applications where written approval hasn't been provided.

Regards,

Sheena McGuire
Senior RMA Advisor
KiwiRail Holdings Limited



NOTES

Survey District: Canterbury

Total Area: 46.973 ha

Legal Description: Part RS 1463, Part Lot 40, Part Lot 41, Lot 42, Part Lot 43, Part Lot 44, Lot 45 & Lot 46 DP 644, Part Lot 2 & Part Lot 4 DP 3257, Lot 2 DP 29839, Lot 2 DP 43669 & Lot 5 DP 416719

Comprised In: CB11K/460, CB209/122, CB518/170, CB 69/53, CB92/204, CB33A/835, CB22D/852, CB2C/925 & RT464388

Applicants: Crichton Development Group Limited

Registered Owners: 880 Main North Road Limited, Balance Developments Limited, Natrodale Farm Limited & Kristy Ann Inwood

Local Authority: Christchurch City Council

Zone: Industrial General Zone

Horizontal Datum: NZGD 2000 Mount Pleasant

- ALL AREAS AND DIMENSIONS ARE SUBJECT TO FINAL SURVEY.
- A FULL ASSESSMENT OF EASEMENTS WILL BE UNDERTAKEN AFTER THE ENGINEERING ACCEPTANCE AND ADDED WHERE REQUIRED.
- THIS PLAN IS SUBJECT TO APPROVALS.
- LOT 330 TO VEST AS RECREATION RESERVE WITH CHRISTCHURCH CITY COUNCIL.
- LOTS 311 & 406 TO VEST AS LOCAL PURPOSE 'STORMWATER' RESERVE WITH CHRISTCHURCH CITY COUNCIL.
- LOTS 500-518 TO VEST AS LEGAL ROAD WITH CHRISTCHURCH CITY COUNCIL

SCHEDULE OF AREAS			
TYPE	No OF LOTS	AVERAGE AREA (m2)	TOTAL AREA (m2)
RESIDENTIAL – MEDIUM DENSITY	454	435	197537
RESERVE/SMA	3	63775	191324
ROAD	20	4043	80870
		TOTAL	469731

SCHEDULE OF ROADS		
ROAD NO	ROAD TYPE	LEGAL WIDTH
ROAD 1	PRIMARY	18m
ROAD 2	SECONDARY	16m
ROAD 3	PRIMARY	18m
ROAD 4	SECONDARY	14m
ROAD 5	TERTIARY	12m
ROAD 6	SECONDARY	14m
ROAD 7	TERTIARY	12m
ROAD 8	PRIMARY	18m
ROAD 9	SECONDARY	14m
ROAD 10	SECONDARY	14m
ROAD 11	SECONDARY	14m
ROAD 12	TERTIARY	12m
ROAD 13	SECONDARY	14m
ROAD 14	TERTIARY	12m
ROAD 15	TERTIARY	12m
ROAD 16	SECONDARY	16m
ROAD 17	SECONDARY	16m
ROAD 18	SECONDARY	14m
ROAD 19	SECONDARY	14m
ROAD 20	PRIMARY – TYRONE ST.	18m

LEGEND

- Proposed Lot Boundary
- Road Boundary
- Abuttal Boundary

Memorandum of Proposed Easements			
Purpose	Shown	Servient Tenement (Burdened Land)	Dominant Tenement (Benefited Land)
Right of Way, Right to convey Water, Telecommunications, Electricity, Right to drain Water & Sewage	A	Lot 360	Lot 359
	B	Lot 357	Lot 358

A1 SCALE 1:2000 A3 SCALE 1:4000

0 50 100 150 200 (m)

Rev#	Description	Drawn	Date
-	-	-	-
-	-	-	-
C	Layout update along ponds and wetlands	ZC	03.05.24
B	Ponds and wetlands added	ZC	01.05.24
A	For information	PR	26.04.24



Level 1, 93 Manchester St, Christchurch 8022
Ph. 03 377 3290
Level 1, Shed 19, Princess Wharf, Auckland 1010
Ph. 09 600 1099
www.inovo.nz

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Scale A1
1:2000
Scale A3
1:4000
DO NOT SCALE FROM DRAWING

Drawn
PR
Approved
MP
Date
26.04.2024

Client
880 MAIN NORTH ROAD LIMITED

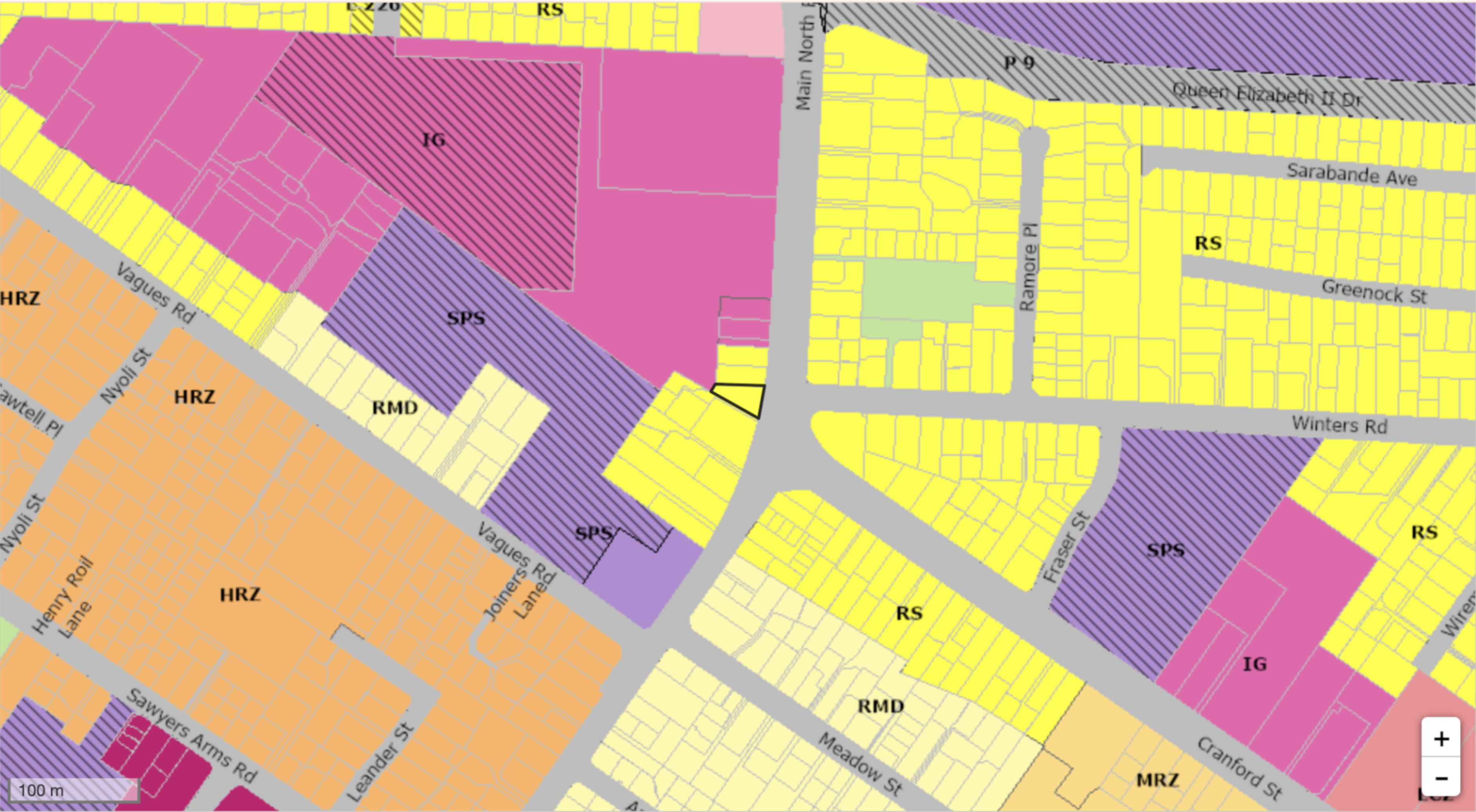
Project
880 MAIN NORTH ROAD BELFAST CHRISTCHURCH

Drawing Title
APPLICATION PLAN

Status
FOR INFORMATION

Drawing No.
15845-AP-001

Rev
C



Land Use Zones

Labels

Zone Labels

Zone

IG

Industrial General Zone

OCP

Open Space Community Parks Zone

OWM

Open Space Water and Margins Zone

RMD

Residential Medium Density Zone

RNN

Residential New Neighbourhood Zone

RS

Residential Suburban Zone

RuUF

Rural Urban Fringe Zone

SPS

Specific Purpose (School) Zone

Transport Zone

CCZ

City centre zone

HRZ

High Density Residential Zone

LCZ

Local Centre Zone

MRZ

Medium Density Residential Zone

NCZ

Neighbourhood Centre Zone

TCZ

Town Centre Zone

Designations and Heritage Orders

Designation

Designation

149 Main North Road Property Search Results

The information below is relevant to the selected property. Click on the blue text below for more details.

Land Use Zones

Zone

RS

Residential Suburban Zone





Figure 3: West side of Radley St (112, 114, 116 Radley etc) - Zoned 'Residential Suburban'

When we purchased our home at 119 Radley St in 2021, we were fully aware that there was a factory over our back fence, and that there would likely be some noises we'd have to accept as a natural and fair part of the deal. We have never actually had any issue with the factory. However, some of the changes proposed under PC20 make us fear that there will be far worse impacts on our residential property.

In particular, the new rule proposed for "*Non-complying activity status for residential, guest accommodation, education and healthcare activities within the Industrial General and Park zones*" could significantly and adversely impact on us and our residential neighbours.

Without being planners, we assume this could greatly restrict what we are able to do on our properties. It would also gravely affect our peaceful enjoyment of our properties if, for example, a storage site, car park, warehousing and distribution etc were to be built next door, with all the associated vehicle traffic etc, and the impact on the visual amenity and residential character of our row of homes - an outcome that is far more likely if redeveloping one of these properties as a residential dwelling, is made much more difficult under the proposed District Plan changes. We think having an Industrial-type activity next door will have a far greater impact on our peaceful enjoyment of our homes than having such activities over the back fence.

Also, is it correct to assume that this rule would make it more difficult to get an extension to our house consented, or other changes we might like to make to our home in future?

Not being planners, we don't know what the best approach is to addressing the balance between protecting the amenity of existing homes in an Industrial Zone, but we hope Planners can give some thought to this and take us into consideration as details of the Plan Change are developed. Would it be worth considering shifting the boundaries of the Suburban Residential zone across the road, to include our pod of homes (109 – 121 Radley St), for example?

Continues next page

319 Cranford Street

