

**Before the Hearing Panel appointed by the
Christchurch City Council**

In the Matter of

the Resource Management Act
1991 (**Act**)

And

In the Matter of

Proposed Plan Change 19 to the
Christchurch City Council: Marshs
Road Industrial

**Statement of Evidence of
Kim Philip McCracken
for Calder Stewart Development Limited**

Dated: 2 October 2026

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INTRODUCTION

Qualifications and Experience

1. My full name is Kim Philip McCracken and I am a Resource Management Consultant based in Christchurch. I have the qualifications of BA, Dip TP, and have 40 years' experience in resource management in both New Zealand and the United Kingdom.
2. I am currently a Director of Kim McCracken & Associates Limited, a Christchurch-based Resource Management Consultancy.
3. Although this is not an Environment Court Hearing, I have read the Code of Conduct for Expert Witnesses (Rule 300A, High Court rules and Environment Court Practice Note) and I agree to comply with it. I have complied with it in the preparation of this statement of evidence.
4. I was involved in the review of the Christchurch District Plan and presented evidence on a number of matters for a variety of clients including for Calder Stewart Ltd (applicant).
5. I have provided planning advice and prepared plan changes and evidence for several years in the current location. This includes the rezoning of:
 - (a) Plan Change 54 – Calder Stewart – land bounded by Sir James Wattie Drive/motorway.
 - (b) Some 15 plus resource consents for Calder Stewart.
 - (c) Plan Change 47 rezoning for John Jones Steel Plan – Sir James Wattie Drive.
6. I have prepared the s32 assessment and plan change documentation for PC19, along with 10 associated consultants, and met with the Christchurch City Council (**Council**) planning officers over a period of 3-4 years. I have been asked by Calder Stewart Development Limited (**Calder Stewart**) to prepare evidence in relation to the plan change, the matters raised by the s42A report and by the submitters to this hearing.
7. In the preparation of this evidence, I have reviewed the following documents:
 - (a) National Policy Statements and National Environmental Standards, most specifically:
 - (i) NPS on Urban Development 2020 (**NPS-UD**);

- (ii) NPS on Highly Productive Land 2022 (**NPS-HPL**);
 - (iii) NPS on Infrastructure 2025 (**NPS-I**); and
 - (iv) National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (**NESCS**)
- 8. Additionally I have reviewed:
 - (a) the Christchurch City Council Operative City Plan;
 - (b) the Regional Policy Statement;
 - (c) the Greater Christchurch Spatial Plan;
 - (d) the submissions; and
 - (e) the Council s42A reports prepared for this hearing.
- 9. In preparing my evidence, I have relied upon and had the assistance of other technical experts presenting evidence on behalf of the Calder Stewart. This evidence covers:
 - (a) transport;
 - (b) soils and agriculture;
 - (c) infrastructure;
 - (d) contamination;
 - (e) landscape and amenity;
 - (f) noise; and
 - (g) bird strike.

SCOPE OF EVIDENCE

- 10. The purpose of my evidence is to assess the application and the environmental effects of the development sought by the application in terms of the relevant planning instruments. As a consequence, my evidence is set out as follows:
 - (a) executive summary;
 - (b) background and role;

- (c) existing and future environment;
- (d) the site and locality;
- (e) the proposal;
- (f) compliance with the Christchurch District Plan (**CDP**);
- (g) summary of the effects
- (h) statutory considerations;
- (i) response to submissions;
- (j) response to planning issues in submissions and s42A report; and
- (k) conclusions.

EXECUTIVE SUMMARY

11. The NPS-UD Policy 2 requires the Council to ensure there is sufficient development capacity for business and to allow for a range of business activities in a range of locations.
12. There is I believe a clear shortage of greenfield business and industrial land in the long term, particularly for warehousing/logistics. This is confirmed by the assessments undertaken for PC19 - Annexure C – Colliers Research Report (February 2023) and the updated Greater Christchurch Business Capacity Assessment (2026).
13. PC19 provides the opportunity to deliver some significant additional capacity – albeit not dramatically large. However, capacity needs to be considered not just in terms of land area (i.e. ha) but also in terms of:
 - (a) in creating a quality business environment;
 - (b) access to infrastructure (i.e. services, roading); and
 - (c) relationship to other complementary zoning and activities consistent with the established urban activity and character.
14. These are all the matters identified in NPS-UD (i.e. refer Objective 6 and Subpart 2 – Responsive Planning).
15. The site is considered to achieve these outcomes in terms of the Christchurch urban environment, particularly having regard to:

- (a) New business growth must be able to be serviced. The assessment (Annexure D PC19) and the evidence presented by Mr Hall confirms that these services exist or can be extended/established. This is also a relevant factor under the NPS-I (infrastructure);
 - (b) The position in terms of this land or its suitability for business use was in part identified by the decision of the Independent Hearing Panel (2014), which initially provided for the extension of the main link road between Shands Road and SH1. The situation of the land and the IHP process is set out in PC19 (p23) but I have only included the most relevant plan for information (Fig 2 over);
 - (c) No natural hazards exist and there are no ground contamination concerns as in the evidence of **Mr Knoyle**; and
 - (d) The plan change will enable the traffic environment to be improved by way of local road upgrades and better intersections, including the opportunity for enhanced public transport access, Annexure F (PC19) and the evidence of **Mr Leckie**.
16. In addition, the ability of the land to contribute to real agricultural productivity based on both the soil quality and the related constraints on farming is negligible. This was outlined in detail in Annexures I and J to the PC and in the evidence of **Mr Gordon**.
17. The general conclusion I have reached is that the proposal will result in significant benefits, not just for the applicant, but for the overall community for the following reasons:
- (a) enhanced business opportunity in a highly desirable business environment;
 - (b) will not impact rural productive potential;
 - (c) significantly contribute to and improve the transport network;
 - (d) has access to all services;
 - (e) that any potential adverse effects on residential owners can be mitigated;
 - (f) there will be no bird strike risk; and
 - (g) significantly enhanced landscaping.

BACKGROUND AND ROLE

18. I have been involved in the preparation of PC19 for some five years, initially with the applicant and ten associated consultants, along with in-depth meetings with the Council. I was involved alongside the applicant in providing information to the community and attending informal drop-in meetings with local residents. I initiated the consultation with Ngai Tahu (MKT Ltd) and obtained the formal response from that party. I have been involved in regular contact with the Council and the preparation of the RFI response to the Council enquiries.
19. I am very familiar with the area and have worked with the client, along with a number of developers in regard to other major industrial rezoning proposals in the area, in particular PCs 54 and 47, which covered all the land between Sir James Wattie Drive, the motorway and Shands Road as well as some 10-15 business resource consents within that business area.

EXISTING ENVIRONMENT

20. The detailed description of the site and locality is set out in PC19 (pages 24-28). I do not wish to repeat all of that detail, but in summary (refer **Annexure 1 – Site Plan**):
 - (a) the site has frontage to Marshs Road and SH1/Main South Road;
 - (b) it covers an area of 19.5ha of land zoned Rural Urban Fringe Zone (**RUFZ**);
 - (c) the land adjoining the immediate north-west corner of the site (intersection of Marshs Road/SH1) is zoned Commercial Local (CL) and contains eight local shops with angle parking. A community park (Islington Park) is located adjacent the north-east corner of the site and is accessed from SH1. Opposite the site (across Marshs Road) the land is zoned Rural General in the Selwyn District Plan but contains the premises of Harvest Rural Machinery;
 - (d) there are multiple access points to the subject land both from SH1 and Marshs Road. There are currently some 25 vehicle access points to the land from the Main South Road/ SH1, and 14 vehicle access points from Marshs Road;
 - (e) the land on the east and south boundaries of the site is all zoned IHZ), with the land to the immediate north across SH1 zoned Industrial General (refer **Annexure 2 – Current Zoning Plan**). The IH zoned land to the south and east has already been developed, in substantial part, by the applicant;

- (f) the site has had a slightly tortuous process in terms of the City Plan (IHP) and Regional Plan (PC1) hearing processes. This is also set out in PC19 application, being:
- (i) a submission was lodged (Canterbury Earthquake Recovery Authority) to include an extension of the road (minor arterial) as shown on the then ODP (Shands Road to the east boundary of the site) through to SH1; (refer **Annexure C – IHP Decision plan**)
 - (ii) the eastern part of land adjoining the site through to Shands Road was identified as a future growth area for business (CRPS 1998) but excluded the land subject to PC19. This position was confirmed through the review of the CRPS (2013);
 - (iii) as part of the City Replacement District Plan, the adjoining area, already identified for future Greenfield Urban Growth Business, was rezoned Industrial Heavy;
 - (iv) the proposed/identified road extension (part of PC19) was supported by the Council and NZTA traffic experts;
 - (v) as discussed within the Decision of the Independent Hearings Panel convened to make decisions on the Proposed Replacement Christchurch District Plan there were concerns with the inclusion of the indicative road and associated notation about a potential designation through this process while the road extension identification was opposed by one local land owner. The Panel agreed that the inclusion of the notation could unfairly prejudice the submitter's position and directed that it be removed from the ODP. As a result, the operative ODP for this location does not show any potential roading connection through to Main South Road.
21. The immediate locality surrounding the subject land has seen a significant change in land use, zoning and character over the last 10 years with the re-alignment of the Pound Road and Waterloo Road intersection and the development of the new light-controlled intersection at Pound Road/SH No.1 opposite the site. The land opposite the site (north side of SH1) has been redeveloped for a new service station, tavern and a group of six shops with the land to the north-east and south-west already substantially developed for industry.
22. Finally, the wider road network in south-west Christchurch has undergone significant change. This includes the completion of the southern motorway, the re-alignment of Marshs Road, and the potential to complete the new minor arterial link from Shands

Road via the subject land to meet the light-controlled intersection at the Pound Road/SH1.

23. As a result of the above and having regard to the following assessments, the applicant has now applied for the plan change set out as follows.

THE PROPOSAL

24. Calder Stewart initially sought a rezoning from RUFZ to IHZ across a 23ha area, which included existing residential landholdings on Marshs Road and SH1. A 20m setback was initially proposed for a period of 10 years, after which no setback would apply.
25. Following receipt of the section 42A report, the applicant has now amended its proposal to:
- (a) remove the residential landholdings from the proposed plan change area such that the residential holdings remain zoned RUFZ;
 - (b) zone the section of the site that is owned by the applicant IHZ;
 - (c) zone the section of the site that is not owned by the applicant and is closed to the residential landholdings Industrial General Zone (**IGZ**); and
 - (d) apply a 20m setback from the residential dwellings (with no expiry).

HEAVY INDUSTRIAL AND GENERAL INDUSTRIAL ZONES

26. The purpose of the Industrial Heavy and General Zones is set out in the City Plan (Chapter 6). Principally:
- (a) **16.2.1 Objective - Recovery and growth**
 - (i) The recovery and economic growth of the district's industry is supported and strengthened in existing and new greenfield industrial zones.
 - (b) **16.2.1.1 Policy - Sufficient land supply**
 - (i) Maintain a sufficient supply of industrial zoned land to meet short, medium and long term supply needs of industrial activities, having regard to the requirements of different industries, and to avoid the need for industrial activities to locate in non-industrial zones.

(c) **16.2.1.2 Policy - Enable the development of industrial areas to support recovery**

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

(d) **16.2.1.3 Policy - Range of industrial zones**

Industrial Heavy Zone

Recognise and provide for a full range of industrial and other compatible activities that generate potentially significant effects, including relatively high levels of noise, odour, heavy traffic movements, and the presence of significant amounts of hazardous substances, necessitating separation from more sensitive activities.

Industrial General Zone

Recognise and provide for industrial and other compatible activities that can operate in close proximity to more sensitive zones due to the nature and limited effects of activities including noise, odour, and traffic, providing a buffer between residential areas and the Industrial Heavy Zone.

27. Having regard to the above, the applicant now seeks the following amendments to the CDP:

- (a) Industrial Heavy zoning across the portion of the site immediately adjacent to the existing Industrial Heavy Zone.
- (b) Industrial General zoning over the balance of the site, excluding the residential properties.
- (c) The residential properties to retain their existing RUF zoning as per the recommendation in the s42A report.
- (d) extending ODP (16.8.8 South West Hornby, Industrial Area) across the site.
- (e) subdivision to be in accordance with the ODP which shows the main road linkages, connection points, stormwater facility and references the building setback position being new rule 16.5.4.2.3.

28. The principal changes to the CDP are limited to:

- (a) updating the planning maps;
- (b) extending ODP 16.8.8 to include the site;
- (c) the development to remain subject to the wider district plan provisions with some specific changes to the setback rules/landscaping and the timing of the coming into effect of the zoning over part of the land to be triggered by a set date. The provisions are set out in PC19; and
- (d) a significant reduction in road access points with only a single road access point to SH1 and no access point to Marshs Road; and

EFFECTS ON THE ENVIRONMENT

29. **Mr Lightbody** (CCC) and the Council s42A report provides a full assessment of the potential effects which could arise from the PC including specific matters raised in the submissions. The particular concern raised in the s42A report is:

- (a) the impact of the IH zone/provisions on the directly adjacent existing residential uses with the recommendation to change the zoning from IH to Industrial General and to exclude the residential activities from the industrial zoning.;
- (b) this has resulted in recommended changes most significantly to amend the zoning from IH to IG and to exclude the residential properties from any industrial zoning

30. There is also significant agreement and alignment between the s42A report and the purpose of PC19, including on:

- (a) infrastructure;
- (b) transport;
- (c) soil/agricultural potential;
- (d) the demand/need for additional industrial land.

31. A summary of the effects identified (and as set out in PC19) are addressed in my evidence as follows:

- (a) infrastructure/servicing;
- (b) transport;
- (c) land supply;

- (d) landscape and visual;
- (e) natural hazards;
- (f) contamination;
- (g) soil quality;
- (h) acoustics; and
- (i) bird strike

Infrastructure

32. The IH zone which adjoins the site (south and east boundaries) is currently being developed by the Applicant and an indicative layout (refer Fig. 4 over) was prepared to enable the service assessment to be undertaken. The land subject of the plan change is able to be serviced with stormwater, electricity, telecommunications, water and sewer as set out in the Infrastructure Report (Annexure D PC19). As such there are no servicing constraints that would prevent the development of the site. The site is relatively flat and is bordered by a water race running along the Marshs Road boundary. In particular:

Sewer

33. All sites will be serviced by a Local Pressure Sewer network. Each site will have a private individual pump reservoir connected to a common pressure sewer pipe in the street. Sewerage will be piped to the existing Council Pump Station (PS0146 Pound Road) and then to the Council sewer. This is confirmed in the Council s42A report and in the evidence of Mr Naidoo on behalf of the Council.
34. The assessment and modelling indicate that wastewater capacity should not be an issue in rezoning the land to Industrial Heavy (IH) with a range of outlet options available to consider (Annexure D). Again addressed in the s42A report.

Water Supply

35. The detail of the proposed water supply is set out in Annexure D to PC19. It is proposed that there will be two connection points to the existing Council system surrounding the area. Potable water supply is available.

Stormwater

36. The stormwater facility will be constructed in Phase 2 (the adjoining site), part of the broader Hornby Quadrant development which will provide stormwater

mitigation for Phase 2 and in the proposed Plan Change 19 area. (Refer Outline Development Plan 16.8.8 (i) and (ii).)

37. Through consultation with the Council it is proposed that stormwater be treated and disposed of under the Council's global consent CRC190445 in the following ways:
 - (a) The stormwater facilities have been sized in accordance with the Christchurch City Council's WWDG. Refer to Appendix H (Annexure D) for the stormwater catchment plan and basin calculations.
 - (b) Secondary flow paths within the site will follow the road network. All roads are graded to convey the secondary flow towards the south-eastern corner of the site where the proposed basins are located.

Power/Telecommunications/Street Lighting

38. Power and telecommunications will be provided to all sites at utility company standards
39. All cables will be placed underground and street lights provided.

Transport

40. The principal outcomes will be:
 - (a) The land area (and ODP) will be serviced primarily by the new road (Minor Arterial) which will connect to the existing Minor Arterial linking from Shands Road to the south-east boundary of the site (SWH- ODP Hornby Industrial Area 16.8.8) extending the minor arterial through the site to the SHNo1 (Pound Road) intersection.
 - (b) There will be no new road access to the site from Marshs Road.
 - (c) Removal of over 40 residential access points to SH1/Marshs Road at the end of their residential use.
 - (d) New roads in the Plan Change will be able to accommodate footpaths/shared paths connecting to existing footpaths/shared paths.
 - (e) The existing bus stops on Waterloo Road east of Pound Road are within an acceptable walking distance.

- (f) The new Minor Arterial road would be capable of accommodating a bus route and make the adjacent industrial areas more accessible for non-car travel.
 - (g) The new road will contain street lighting (Refer Cross Section, Annexure D to PC19).
41. The outcome of the Plan Change will provide for the fourth leg at the SH1/Pound Road intersection. The preliminary design (concept) is provided in Annexure E to PC19 and will result in significant traffic benefits for the area, including increased safety at the Marshs Road/SH1 intersection. (Refer evidence **Mr Leckie**.)
42. The Transport Assessment Annexure E (PC 19) sets out the outcomes in its conclusion and refers:
- “The proposed Plan Change would see the last small corner of the land to the south-east of the SH1/Marshs Road intersection zoned for industrial use, consistent with the surrounding zoning. It is considered a logical completion of the industrial area and rezoning will have a number of transport-related benefits as outlined in this report.”

Natural Hazards

43. A Geotechnical Investigation Report for the site is set out in Annexure H to the PC19 application. The site-specific investigations comprised 16 machine-excavated test pits with associated Dynamic Cone Penetration tests. In summary:
- (a) ground water was not encountered within the machine-excavated test pits;
 - (b) the liquefaction risk is low and likely consistent with a TC1 technical classification;
 - (c) the site is not located within an identified active fault hazard zone; and
 - (d) the site is not mapped within a Flood Management Area.
44. Overall, the conclusion of the Geotechnical Assessment (Annexure H) was that the land was suitable for the proposed re-zoning.

Soil Contamination

45. Preliminary and Detailed Site Investigations into the potential for soil contamination were undertaken for the various properties contained within the Plan Change site. These investigations are contained in Annexure E to the Plan Change application and the evidence of **Mr Knoyle**.

46. The conclusion of the above assessment (Annexure E) is summarised as follows (to quote):

In summary, the available historical information for the overall site shows that it was in pasture or used for cropping activities from at least 1941 (earliest aerial image). Residential development progressively occurred along the northern site boundary (Main South Road) and along the northern part of Marshs Road. The six largest properties associated with the proposed plan change (occupying approximately 19.5ha), predominantly comprised paddocks used for grazing livestock, a horse training track, a reserve, and rural residential properties.

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

Versatile Soils

47. The CDP has not undertaken a soil mapping exercise and as such we have to rely on the transitional provisions of the HPL.
48. The site contains Class LUC2 soils. Within the last 50 or so years the site has been used for grazing some cropping and residential activity. Industrial development will inevitably involve increased building and hard surface coverage, recognising that there is some potential to retain some limited use of the soils through planting, grassed areas and land drainage (swales, soakholes etc.) within individual properties.
- (a) In light of these constraints, the overall benefits of retaining this land for primary production are negligible. That is especially given:
- (i) There are no other rural sites within the same locality that have lower productive capability than Calder Stewart's site;
 - (ii) The proportional reduction in HPL in the district and the region as a result of the rezoning of the Site are insignificant;
 - (iii) The servicing of the Site has been factored into the services already provided for within The Hornby Quadrant development adjacent to the site; and
 - (iv) The Site is fragmented being comprised of 40 lots and is isolated as defined in Clause 3.4 of the NPS-HPL.

49. This is addressed in the evidence of **Mr Gordon**.

Reverse Sensitivity/Amenity/Landscaping

50. Reverse sensitivity or the concept of incompatible adjoining land use activities is a relevant consideration especially where IH uses are encroaching on established residential properties. It is perhaps an unfortunate fact of the land use planning process that land zonings and use change, if not well managed, can cause significant upheaval. In order to deal with the “reverse sensitivity” issue as a change of zoning proceeds, the applicant is proposing a staged approach to the industrial zoning at the west and south boundaries of the site where it most affects the existing residential properties. This involves:
- (a) increased minimum building setback between the houses and the IH zone to 20m;
 - (b) a 10m landscape strip adjacent to all residential properties; and
 - (c) More extensive planting. Refer evidence of **Mr Smith**.
51. The land subject of the proposal is currently a mix of low-level grazing, 34 residential dwellings on lots averaging around 800m² and a limited number of rural/lifestyle lots. Changing the zoning will alter the character of the site, although this does not mean that adverse effects will automatically result. The land is already a combination of urban/residential and low-level rural activity and is currently zoned Rural-Urban-Fringe zoning which anticipates a number of urban-type activities.
52. A Landscape and Visual Effects Assessment of the proposed Plan Change is set out in Annexure D and in the evidence of **Mr Smith** (2026). That assessment considered the existing landscape character of the environment and the potential visual/amenity impacts of the proposed rezoning from multiple reference points.
53. That assessment noted that the plan change has been designed to stage the extent and impact of the Zone on the existing residential neighbours within the block. In particular, it recommended the above increased setback and landscaping provisions between the houses and the IH zone.
54. The Landscape and Visual Assessment concluded that:

In summary, PC19 represents an appropriate and logical extension of the existing South West Hornby Industrial Area. While the proposal will result in a substantial change to the character of the Site, this change when considered within the wider receiving environment, is already strongly influenced by established industrial

development, strategic transport infrastructure and the planned growth of Christchurch's industrial land. In this context, the proposal will consolidate and complete a co-ordinated pattern of industrial expansion rather than retain land that will become redundant rural land or introduce an unfamiliar land use.

*Overall, I conclude that proposed PC19 will result in a **Low to Low-Moderate** degree of adverse landscape effects on the receiving environment. The proposal is consistent with the existing and anticipated development pattern of the South West Hornby Industrial Area and will achieve a coordinated and well-integrated outcome.*

Cultural/Heritage

55. There are no cultural heritage sites on the land and a preliminary report was obtained from Mahaanui Kurotamo Ltd (for Ngai Tahu). That report provides comprehensive, albeit preliminary, advice with a number of recommendations regarding protocols, particularly at the subdivision stage.

STATUTORY FRAMEWORK

56. The critical planning documents are:
- (a) National Policy Framework;
 - (b) Regional Council Plans;
 - (c) the City Plan; and
 - (d) the Resource Management Act 1991.

National Policy Framework

57. This includes the:
- (a) NPS - Urban Development
 - (b) NPS - Highly Productive Land
 - (c) NPS - Infrastructure
 - (d) NESCS – Ground Contamination

National Policy Statement on Urban Development

58. In relation to the NPS-UD Policy 2, two assessments in PC19 are particularly relevant being Annexure B – Economic Assessment and Annexure C – Industrial Land Supply

59. The conclusion of their assessments are:

Economic Assessment (Annexure B)

Summary

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

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

However, HBA sufficiency is not considered the primary consideration in this instance. HIZ land is difficult to rezone and service given the significant infrastructure requirements. The subject piece of land represents a small natural extension of an existing HIZ block that would provide significant infrastructure and serviceability efficiencies for HIZ activities. It is the last remaining area within a wider HIZ block, is very well connected to key transport routes and is easily accessible to rail and the airport for domestic and international deliveries.

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

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

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

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

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

Land Supply Assessment

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

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

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

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

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

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

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

62. The **National Policy Statement on Urban Development (NPS-UD)** recognises at a national level the significance of well- functioning urban environments. In particular the Objectives of the NPS-UD seek the following:
- (a) Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
 - (b) Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:
 - (i) the area is in or near a centre zone or other area with many employment opportunities
 - (ii) the area is well-serviced by existing or planned public transport
 - (iii) there is a high demand for housing or for business land in the area, relative to other areas within the urban environment.
 - (c) Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.
 - (d) Objective 6: Local authority decisions on urban development that affect urban environments are:
 - (i) integrated with infrastructure planning and funding decisions; and
 - (ii) strategic over the medium term and long term; and
 - (iii) responsive, particularly in relation to proposals that would supply significant development capacity.
 - (e) Objective 7: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.
63. The main tool to achieve these objectives is a Future Development Strategy (FDS) which has the purpose of achieving well-functioning environments in existing and future urban areas and to provide at least sufficient development capacity over the next 30 years to meet expected "urban" demand.

64. At present there is no FDS for the greater Christchurch Area although the Greater Christchurch Spatial Plan (GCSP) has been prepared. This report is at a high level but in the context of this matter it does identify the Hornby locality as a major growth centre and preferred location for newly/expanded industrial areas, particularly logistics (refer Maps 13/14 of the Spatial Plan). The position is also now better informed by the updated Greater Christchurch Business Capacity Assessment (2026).
65. Policy 1 following on from Objectives 2 and 3 defines well-functioning urban environments as urban environments that, as a minimum, include:
- (a) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
 - (b) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
 - (c) support, and limit as much as possible, adverse impacts on the competitive operation of land and development markets; and
 - (d) support reductions in greenhouse gas emissions; and
 - (e) are resilient to the likely current and future effects of climate change.
66. Objective 6 of the NPS-UD is highly relevant to this proposal and seeks to ensure local authority decisions on urban development that affect urban environments are:
- (a) integrated with infrastructure planning and funding decisions; and
 - (b) strategic over the medium term and long term; and
 - (c) responsive, particularly in relation to proposals that would supply significant development capacity.
67. Urban Environment is defined as:
- (a) Is or is intended to be predominantly urban in character, and
 - (b) Part of a housing and labour market of 10,000.
68. This Objective is implemented by:
- (a) Policy 2, which requires that, at all times, there is at least sufficient development capacity to meet the expected demand for business land, over the short, medium and long term; and

- (b) Policy 8 – which requires that local authorities are responsive to plan changes that would add significantly to development capacity and a well-functioning urban environment. This is reinforced by the Regional Policy Statement (RPS) Policy 6.3.6 Business Land that sets out the need to provide sufficient business land, namely:
- (i) Recognises demand arising from the relocation of business activities as a result of earthquake-damaged land and buildings;
 - (ii) Recognises that new greenfield priority areas for business in Christchurch City are primarily for industrial activities, and that commercial use in these areas is restricted;
 - (iii) Utilises existing infrastructure availability, capacity and quality;
 - (iv) Ensures reverse sensitivity effects and conflicts between incompatible activities are identified and avoided or mitigated against;
 - (v) Ensures close proximity to labour supply, major transport hubs and passenger transport networks;
 - (vi) Encourages self-sufficiency of employment and business activities within communities across Greater Christchurch; and
 - (vii) Incorporates good urban design principles appropriate to the context of the development.
69. The zoning of the proposed land will achieve all of these outcomes as it provides an additional 19.5 ha of industrial land in an appropriate location and it meets the objectives of the NPS-UD as set out above .
70. Policy 8 provides for proposals to be considered notwithstanding that they are “unanticipated” by RMA documents or are out-of-sequence with planned land release. Policy 8 allows for consideration of proposals to rezone land that are, for example, not identified as a Greenfield Priority Area (GPA) or Future Development Area (FDA) in the CRPS. (Refer Fig 5 and 6)
71. Although the site is identified in the CRPS as within the existing urban area (Fig 5) and alongside an FDA, it is under Policy 8 an unanticipated location.
72. Guidance in terms of the application of Policy 8 is found within the NPS-UD itself. Clause 3.8, Out of Sequence Development, states that:

- (a) Every local authority must have particular regard to the development capacity provided by the plan change if that development capacity:
 - (i) would contribute to a well-functioning urban environment; and
 - (ii) is well-connected along transport corridors; and
 - (iii) meets the criteria set under subclause (3); and
 - (iv) Every regional council must include criteria in its regional policy statement for determining what plan changes will be treated, for the purpose of implementing Policy 8, as adding significantly to development capacity.
73. In terms of (3) above, no such criteria have been included in the CRPS (except as noted above in policy 6.3.6 Business Land). As such, only the matters listed in (2) above are relevant.
74. Delivering significant capacity is not simply a numbers or “area” consideration game. The NPS-UD defines “development capacity” as:
- (a) the capacity of land to be developed for business use, based on:
 - (b) the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and
 - (c) the provision of adequate development infrastructure to support the development of land for housing or business use.
75. The definition of “development infrastructure” includes water, wastewater and stormwater as well as land transport infrastructure. Therefore, if the zoning cannot be serviced by infrastructure it would not meet Policy 8. In this case infrastructure is available. As such the subject land would add significant development capacity and contribute to a well-functioning and urban environment, measured by all criteria, i.e.
- (a) variety of business land;
 - (b) accessibility;
 - (c) competition in land markets; and
 - (d) support the goals of greenhouse reductions.
76. In addition the Council under Policy 2 is directed to ensure at least sufficient development capacity is provided. The zoning will achieve that outcome.

NATIONAL POLICY STATEMENT FOR HIGHLY PRODUCTIVE LAND (NPS-HPL)

77. The first matter to establish is whether the NPS-HPL in fact applies to the site.. The interim definition is that the identification of HPL is that it is zoned General Rural or Rural Production and contains LUC Class 1,2 or 3 soils. While the site contains Class 2 soils, the current zoning is neither General Rural or Rural Production.
78. I consider that it is uncertain if the NPS-HPL applies to this zone given the underlying RUF zone doesn't neatly fit into either Rural General and Rural Production zoning. Given that, I have conservatively applied the relevant NPS-HPL framework which I consider provides a pathway for the rezoning regardless.
79. Having regard to the above NPS-HPL, two assessments of PC19 are particularly relevant. These are:
- (a) Annexure I: Agricultural Report
 - (b) Annexure J: Productive Land Report

NPS-HPL 3.6 – Restricting urban rezoning of highly production land

80. Clause 3.6(1) provides for urban rezoning of highly productive land provided the following conditions are met:
- (a) the rezoning is required to meet the development capacity obligations of the NPS-UD; and
 - (b) there are no other reasonable, practicable and feasible options for meeting those obligations within the same locality and market while achieving a well-functioning urban environment; and
 - (c) the benefits of the urban rezoning outweigh the longer-term environmental, social, cultural and economic costs associated with the loss of highly productive and for land-based primary production, taking into account both tangible and intangible values.
81. Having regard to the above, in reference to Clause 3.6(1)(a), I agree with the conclusions reached in the s42A report that due to the long-term industrial land shortfall as evidenced by the Greater Christchurch Business Capacity Assessment 2026 satisfies this clause of the NPS-HPL. This report (referred to at paragraph 6.2.9 of the Section 42A Report) identifies that Christchurch City has sufficient industrial land supply in the short and medium term, however in the long term a sufficiency shortfall is projected.

82. In respect of Clause 3.6(1)(b), we agree with paragraph 6.3.22 of the Section 42A Report which states Christchurch City is surrounded by LUC Class 1 and 2 land. There are therefore no other reasonably practicable options for urban expansion that would avoid the rezoning of highly productive land.
83. In addition, the Productive Land Report at Annexure J to the application concludes that:
- (a) Nearby land with less than LUC3 class soils was found to be unsuitable for the proposal as it is further from other existing industrial land and would be isolated compared to the proposed plan change site. The cost for infrastructure provision would also be high (at paragraph 10.2).
 - (b) Land with the same or better LUC class as the site in the same locality as the site is likely to be subject to less constraints on productive capacity compared to the site (at paragraph 10.3).
 - (c) The report concludes there is no land within the same locality that has overall lower productive capacity or is better suited to the development than the site (at paragraph 10.4).
84. In summary, the Soil Productivity and Agricultural reports (Refer Annexures I and J) supported the proposal to rezone the site for industrial development in terms of the directions of the NPS-HPL on the basis that:
- (a) There are multiple long-term constraints on the capacity of that site to support primary production activities.
 - (b) In light of these constraints, the overall benefits of retaining this land for primary production are negligible. That is especially given:
 - (i) There are no other rural sites within the same locality that have lower productive capability or less constraints than the site.
 - (ii) The proportional reductions in HPL in the district and the region as a result of the rezoning of the site are insignificant.
 - (iii) The servicing of the site has been factored into the services already provided for within The Hornby Quadrant development adjacent to the site.
85. The proposed rezoning of 19.5 hectares of land between Marshs Road and State Highway 1, Templeton from Rural Urban Fringe to Heavy Industrial will not result in a loss of productive capacity of highly productive land in the community as the land

is sufficiently, and permanently constrained that it is unsuitable for economically viable, land-based, primary producing activities.

86. As the land has not been mapped in terms of the NPS-HPL, having regard to the above assessments and the evidence of Mr Gordon, my conclusion is:
- (a) the land is not and has not been used for any significant productive purpose;
 - (b) that urban expansion would be unlikely to avoid the rezoning of HPL in the Christchurch district;
 - (c) that there is no productive agricultural activity that could readily be undertaken based on the NPS-HPL. The land is economically unviable as a land based primary producing unit (Annexure I);
 - (d) there are multiple constraints on the capacity of the site to support primary production, as set out in the evidence of Mr Gordon;
 - (e) it will not impact the proportion of HPL in the district; and
 - (f) the restrictions on urban rezoning in the NPS-HPL therefore do not apply to the site.

NATIONAL POLICY STATEMENT ON INFRASTRUCTURE

87. The position in respect of infrastructure has been set out in PC19, in particular Annexure D (Infrastructure) and F (Traffic), along with the evidence of Mr Hall and Mr Leckie. These not only identify that infrastructure exists, but that the area is undergoing significant infrastructure capacity upgrades.
88. In summary, the NPS-I 2026 provides for:
- (a) Policy 4 – enabling the efficient and timely operation and delivery of infrastructure activities; and
 - (b) Policy 4(d) – enable opportunities to make more effective use of existing infrastructure.
89. The Plan Change will achieve these outcomes by making more efficient use of established infrastructure. Refer Annexure D – Infrastructure Report, of the application.

NATIONAL ENVIRONMENTAL STANDARD FOR ASSESSING AND MANAGING CONTAMINANTS IN SOIL TO PROTECT HUMAN HEALTH (NESCS)

90. A detailed assessment of the site (contamination – NES) is set out in Annexure G to PC19. This has now been addressed in the evidence of Mr Knoyle whose conclusion is:

Based on the findings of the PSI, there is no reason from a contaminated land perspective why the proposed plan change from RUFZ to IHZ and IGZ (with the residential properties fronting Main South Road and Marshs Road remaining as RUFZ) for the approximate 19.5ha Site could not proceed

CANTERBURY REGIONAL POLICY STATEMENT AND PLANS

Canterbury Regional Policy Statement

91. The Christchurch City Council is required under Section 73(4) of the Act to give effect to the CRPS. Any proposed change to the City Plan must also give effect to the CRPS.
92. The CRPS provides direction on matters relevant to the growth of settlements within the region. The relevant chapters of the CRPS applicable to an assessment of the proposed plan change are:
- (a) Chapter 5 – Land Use and Infrastructure
 - (b) Chapter 6 – Recovery and Rebuilding of Greater Christchurch
 - (c) Chapter 16 – Energy

(i) Chapter 5 – Land Use and Infrastructure

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

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

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

Objective 5.2.3 – Transport network (Wider Region)

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

Policy 5.3.1 Regional growth implements Objective 5.2.1 and states:

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

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

29. **Chapter 6** is possibly the most relevant section of the RPS by setting up the urban development framework.

Chapter 6 – Recovery and Rebuilding of Greater Christchurch

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

Objective 6.2.1 – Recovery frameworks

98. *Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework.*
99. The proposed plan change will support the recovery of Greater Christchurch. It is located in an area of the City which is dominated by urban/business activity. It is designed and located to make efficient use of the transport infrastructure and the land in this area, and reduce the impact of heavy goods vehicles on the transport network and amenity of the City. There is no risk to strategic infrastructure, services or anticipated land use developments. The site does not reflect a high level of rural character or amenity.
100. Chapter 6 was included in the RPS in 2013 having been incorporated from the Land Use Recovery Plan and was developed after the earthquakes to provide a resource management framework for the recovery of greater Christchurch through to 2028. The focus of Chapter 6 is to respond to the demand for business activities. Much of the land identified for business has been taken up and it is concluded that Chapter 6 needs to be assessed recognising that time has moved on and in some areas, land has not been made available for business activity, and the situation has been overtaken by the NPS-UD and in particular Policy 8 of the NPS-Urban Development;

101. The position in respect of the subject land is also reflected in the land demand and economic assessments (Annexures B and C) which concluded that the land was suitable for IH zoning and use given the land has;
- (a) Access to services/infrastructure;
 - (b) Close to and will contribute significantly to the transport network;
 - (c) Proximity to local supply and community facilities;
 - (d) Close to the target market;
 - (e) Proximity to suppliers and client base;
 - (f) Adjacent to the existing HIZ in Hornby now regarded as one if not the most popular and significant industrial locations in Christchurch; and
 - (g) As concluded in the Economic Assessment (Annexure B) the land is the last remaining pocket of land between the existing HIZ and SHNo1 and is a pragmatic and efficient outcome supporting a well-functioning and integrated urban environment.
102. Policy 6.3.1 largely reflects Objective 6.2.1 but adds specific reference to Greenfield priority areas on Map A. Those areas were largely created on the basis of the demand anticipated by the Canterbury Earthquakes but the process is now underway to reconsider future needs throughout Greater Christchurch and currently the proposed rezoning is not necessarily consistent with this policy in regard to Map A. In this context regard should also be had to a number of matters, namely Chapter 6 (RPS), the NPS-Urban Growth and the economic assessments (Annexures B and C).

Objective 6.2.2 – Urban form and settlement pattern

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

Objective 6.2.3 – Sustainability

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

Objective 6.2.4 – Integration of transport infrastructure and land use

105. The zoning will not adversely impact the transport network in the vicinity of the site. The location of the zoning will, however, reduce vehicle movement, enhance the

transport network and transport safety, manage network congestion within the city and optimise the road network capacity in the area.

Objective 6.2.6 – Business Development

106. *Identify and provide for Greater Christchurch's land requirements for the recovery and growth of business activities in a manner that supports the settlement pattern brought about by Objective 6.2.2.*
107. The objective addresses business land development and in particular reflects the need to provide for a range of business land opportunities which promote efficiency and accessibility and reduced energy use. The use of the subject site for the zoning sought will achieve all of these outcomes. The objective in particular refers to:
108. *While there is some capacity for the demand for further industrial business land to be met through the redevelopment of existing zoned land, particularly within Christchurch City, the Greenfield priority areas for business provide for the accommodation of new, primarily industrial business activities. There may also be requirements for relocation of business activities to better land, or areas with potential for expansion where land is currently constrained.*
109. Significantly the policy explanation also refers:
110. *"MAP A (refer **Annexures 4 & 5**) shows existing urban areas and priority areas for development for Greater Christchurch. These areas are identified as being required to provide sufficient land zoned for urban purposes to enable recovery and rebuilding through to 2028. The Policy and Map A provide a clear, co-ordinated land use and infrastructure framework for the recovery of Greater Christchurch."*
111. As such the time period for providing for future industrial land provision has largely arrived and as indicated in the two economic assessments there is a growing need for additional industrial land and the particular locality is one of the preferred industrial hubs in greater Christchurch. This position is highlighted by the NPS-Urban Development Policy 2 which advocates for sufficient development capacity (at all times) for business over the short, medium and long term with long term being defined as 10-30 years.

Policy 6.3.1 – Development within the Greater Christchurch area (Map A)

112. In summary the development appears to be contrary to this policy as the site adjoins but is just outside the Map A Greenfields FDA. The PPC sets out a number of

reasons why these provisions should not prevent the City Council from deciding to rezone the Marsh's Road land for business development including:

113. That the conflict is a minor technicality, well below regional significance.
114. That the merits of any proposal could be considered having regard to the relevant National Policy Statements without being precluded by Map A
115. The fact that the land is zoned for RUF and adjoins major Christchurch industrial zoning is contrary to policies in the CRPS and District Plan now appears to prevent its logical use for business development.
116. The CRPS provisions are historical and arguably out of date and contrary to the NPS-UD as a planning tool
117. There are no local or regional concerns that justify the continued existence and restrictive effects of the urban limit line in its present location, separating the site from the remainder of the business area of south-west Christchurch. To some extent that is confirmed by the spatial plan.
118. On the basis of the above, the Map A boundary in south-west Christchurch should not impede the logical rezoning of the Marshs Road from RUF to IH.

Policy 6.3.2 – Development Form and Urban Design has been addressed in terms of the ODP (or the extension thereto) and the plan change assessment.

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

- (a) The proposed development is in accordance with an ODP providing a consistent integrated plan and in particular:
- (b) The extension of the minor arterial from Shands Road to SH1;
- (c) Complete the full four way controlled light intersection at SH1/Pound Road;
- (d) Will achieve a high level of amenity along the IH – rural zone boundary on Marshs Road;
- (e) Provision of and proximity to all modes of transport;
- (f) Will provide a choice and range of development sites;
- (g) Will not adversely impact water or soil resources; and
- (h) Land is set aside for landscape opportunity and mitigation.

119. In terms of **Policy 6.3.4 – Transport effectiveness**, the plan change reflects an integrated transport outcome in terms of the road network and the type of land use activity involved.
120. **Policy 6.3.5 – Integration of land use and infrastructure**, The (Marshs Road) area is in an outstanding location to efficiently utilise existing and planned extensions and upgrades of services including roading upgrades.
The plan change rezoning by way of location and style of activity is highly supportive of the above outcomes and will make good use of the strategic infrastructure, particularly the road network.
121. **Policy 6.3.6 – Business Land**, addresses the need to utilise existing business land and provide sufficient additional Greenfield priority land for business in accordance with Map A. A number of outcomes are sought through the policy including:
- (a) Reinforcing the role of the central city,
 - (b) Recognising new priority areas for business,
 - (c) Utilising existing infrastructure efficiently,
 - (d) Ensuring reverse sensitivity effects are mitigated, and
 - (e) Ensuring close proximity to labour, transport hubs and passenger transport networks.
122. **Policy 6.3.7** – is similar to Objective 6.2.1 Recovery Framework, Objective 6.2.2 Urban Form and settlement pattern and Policy 6.3.1 Development within the Greater Christchurch Area, all of which seek that urban growth occur within identified greenfield priority areas which are specified on Map A in Chapter 6 of the CRPS. As referred to in the assessment of these policies, the Greenfield areas identified on Map A were developed on the primary basis of anticipated demand created by the recovery and rebuilding process following the Canterbury earthquakes. The growth analysis was stated to apply through to 2028, however, recent analysis of population growth and take-up of land for business (Refer Annexures B and C in the PC19 application) and the Greater Christchurch Business Assessment (2026) have shown that the growth requirements were underestimated and land availability overestimated.
123. It is concluded that the objectives and policies in the current Chapter 6 need to be applied and evaluated recognising that the industrial needs of Greater Christchurch have moved on from responding to the impacts of the earthquakes. There is a demand for business land simply created by natural growth in the population. To meet this demand in an efficient manner and to avoid causing the price of new land to increase beyond normal levels there needs to be provision to meet this demand

in areas such as Hornby which has an unsatisfied demand for industrial sites with a range of sizes.

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

THE GREATER CHRISTCHURCH SPATIAL PLAN (GCSP)

125. The GCSP is a future development strategy and a matter PC19 is to have regard to. Critical to PC19 are the provisions of the GCSP that identify Hornby as a site for growth and more specifically, in business terms, as a centre for logistics (Refer **Annexures 6 & 7**).

CHRISTCHURCH CITY PLAN

District Plan Policy Framework

126. The PC seeks to integrate with the policy provisions and framework of the District Plan. This is to ensure a changing but consistent plan. The PC provided a full assessment of all the relevant District Plan Policies and the overall conclusion was that:
127. It is necessary to look at the appropriateness of the use of the subject land for industrial activity has a number of advantages and reflects a number of wider policy benefits. The subject land does not contribute significantly to any rural productive outcome but its use for business does represent a number of significant benefits in that:
- (a) It is located in an area of high demand and need for industrial growth;
 - (b) Will utilise existing purpose designed industrial infrastructure;
 - (c) Is located central to a major business hub and the national Road network;

- (d) Will contribute to the industrial and general road network in the section of the city increasing transport and efficiency and road safety;
 - (e) It's largely a self-contained block which will not result in the unconsolidated business activities and reflects an outcome that utilises that the RPS Greenfield Priority Areas were set through to 2028 and that date is rapidly approaching;
128. Policy 8 of the NPS-Urban development provides for addressing situations where local authority decisions are responsive to plan changes that add significantly to development capacity and contribute to well-functioning urban environment even if the development capacity is anticipated or out of sequence.

PART 2

129. The purpose of the Resource Management Act is set out in Section 5 being the sustainable management of natural and physical resources. Section 5 is also subject to Section 6, 7 and 8 which set out the matters taken into consideration. In respect of Section 6 (Matters of national importance), none of the matters identified appear relevant for the site. In regard to Section 7 Maintenance and the enhancement and quality of the environment and amenity values, although the amenity values will change, the assessment is that this change will be minor and can be mitigated, particularly given the context of the proposed zoning, the mitigation measures and the extended ODP. In respect of Section 7(b) and the efficient use of resources, the site's location, size and accessibility will result in the proposed zoning being an efficient use of the land and surrounding resources (e.g. roading).
130. Overall the proposal to extend the Industrial zoning is considered to achieve the purpose of the Act and enhance the social and economic wellbeing of the area and the City with efficient, serviceable and accessible land, employment opportunities while avoiding and/or mitigating any adverse effects.

RESPONSE TO SUBMISSIONS

Traffic

131. 148. A number of the submissions have raised concerns about traffic, road intersection design and safety. In summary, the matters of concern are:
- (a) Turning movements;
 - (b) Intersection design/controls; and

- (c) Location/design of the intersection and of the minor arterial through the site to SH1.
132. As outlined in the evidence of **Mr Leckie**, completing the intersection connection to SH1, will provide a much-improved outcome as against the existing Marshs/Main South Road intersection. The road design as set out in PC 19 will be designed to provide street lighting, footpaths and public transport. The road is an integral part of the ODP which requires its construction as part of the development.

Future Road

133. As set out in the evidence of **Mr Leckie**: “the future road connection forms part of the planned transport network for the south-west Hornby area and was assessed on that basis within the ITA”. As outlined at paragraphs 31-33 of the ITA demonstrated that Bruce Steward Drive can be connected to SH1 via a fourth leg at the SH1/Pound Road intersection.

Amenity

134. The submissions in respect of amenity relate to:
- (a) Loss of rural character,
 - (b) Adequacy of landscaping,
 - (c) Visual amenity,
 - (d) Poor urban design outcomes, and
 - (e) Adequacy of setbacks
135. The majority of these matters are addressed in the evidence of **Mr Smith** but in summary I would note that the area is not one dominated by rural character, rather it is dominated by major road infrastructure and traffic, IH zoning on two sides, IG zoning opposite the site, ma small enclave of C4 zoning at the west corner of the site and a non-rural activity (sale of farm machinery) also opposite the site but located in a rural zone along with a number of small rural-residential holding. Additionally, the area is now concentrated around one of the major road/freight intersections with a major re-designed road layout. These changes have been increasing over time and in fact the character of the area is more mixed or mixed-urban and amenity that the amalgam of activities generates.
136. In respect of the adequacy of the landscaping, I would note that the proposed building setback adjoining the residential properties fronting SH1 and Marsh’s Road is 20 m with a 10 m landscaping requirement.

137. In respect of the entrance to Christchurch, I would simply refer to the IG zoning north side of the Main South Road opposite the site and that the zoning does not bring the urban/industrial interface any closer to Templeton, rather it aligns it with the north side zoning opposite the site on the Main South Road.

Regional Consenting Requirements

138. The PC does not preclude a number of regional consenting requirements for matters such as:
- (a) odour – air discharge consents
 - (b) dust – air discharge consents and Site Management Plans
 - (c) wastewater – discharge consents (refer evidence of Mr Hall and Annexure D to PC19)

but these are all largely dealt with at the subdivision stage.

Bird Strike Management

139. I have also read the s42A report of **Mr Lightbody** and largely endorse his conclusion on this matter.
140. My assessment is that the City Plan has a framework that addresses the potential adverse effect, Chapter 6.7.4.3 Management Areas and as illustrated in Appendix 6.7.4.3 over. The important point to note is that the appendix identified all land within 3km of Christchurch Airport Runway as of concern for bird strike and the site is some 6m from the runway (refer over).
141. I have also taken the time to read the ornithological evidence prepared for the IHP which, as noted in the s42A report, there was limited ornithological support for the setback area. (Refer **Dr Rachel McClellan** – decision 57.) The outcome of those assessments formed the basis of the Operative City Plan and in particular “there was no evidence to find the controls beyond 3km would have any benefit”.
142. Again, as noted in s42A report, the same matter was debated through the Selwyn District Plan Review (SDPR) and generally the same conclusion reached.
143. The only other matters I would note are:
- (a) the zoning is going from rural to industrial which potentially could have up to 80-90% sealed coverage, i.e. reducing the bird attracting environment, refer evidence of Ms Civil and the bulk and location standards for the IH zone;

- (b) most if not all of the activities are indoors;
- (c) there are restrictions on water/wastewater discharge in the area of the PC largely precluding many of the processing industries likely to attract birdlife;
- (d) that the assessments undertaken in respect of the City and Selwyn District Plans concluded that:
 - (i) the matter has been evaluated in a comprehensive manner. If new information exists then that may necessitate the rezoning; and
 - (ii) and does the submission request of the CIAL fall within the scope of PC19 and should it not be addressed as a separate city-wide matter. This is a plan change about rezoning land. The implications of the CIAL request are more far-reaching and should possibly be the subject of a separate plan change.

Soils

144. The soils are HPL in terms of NPS-HPL. This matter has been addressed in Annexures I and J, and in the evidence of **Mr Gordon**.

Ecology/Cultural

145. The site is not located in an area of high cultural value. In addition, consultation was undertaken with Ngai Tahu (MKT Ltd) who provided a list of recommendations. These recommendations primarily apply at the time of subdivision consent.

Health Effects

146. To the best of my knowledge there should be no adverse health effects. Matters of dust and odour will be addressed at the time of development and the noise impact is addressed by retaining the current RUF noise provisions for the remaining residential activity.

ASSESSMENT OF THE BENEFITS AND COSTS OF THE PROPOSED CHANGE – SECTION 32

147. The assessment and conclusions reached in the Section 32 assessment contained in the PC19 application are still relevant, notwithstanding that part of the land will now be zoned Industrial General (IG zoning was addressed in the s32 report), and the residential properties are now excluded from the industrial zoning.

148. With respect to section 32AA I have assessed the further changes by Calder Stewart against section 32AA of the RMA. I consider the changes appropriately respond to submissions on the application. Given the changes more effectively reduce and mitigate effects on the environment and neighbors I consider they are more appropriate than the earlier version of the proposal.

RESPONSE TO SECTION 42A REPORT

149. Finally, I would note that there may be a number of outcomes that might address the submitters (residential home owners) concerns set out in the Council's s42A report:
- (a) rezoning the land immediately behind the residential activity IG, rather than IH;
 - (b) retaining RUF zoning over the residential properties;
 - (c) retain RUF zoning over the residential properties; and
 - (d) changes to the rules/ODP to accommodate the above.

Section 42A Report Recommendations

150. The s42A report has recommended that:
- (a) the IH zone be altered to Industrial General; and
 - (b) that the residents facing SH1/Marshs Road retain their RUF zoning.
151. The applicant has given some serious consideration to this solution given that it may provide some relief for the residents (rates, acoustics) but believe it is not the correct long-term solution.
152. As a counter proposal to the Council's recommendation the applicant would promote the following:
- (a) all of the land currently owned by the applicant be zoned IH. This would provide a better synergy and development opportunity between the current IH zone land owned by the applicant and the site.
 - (b) That the balance of the land excluding the dwellings fronting Marshs Road and SH1 be zoned Industrial General
 - (c) The dwellings fronting Marshs Road and SH1 remain zoned as RUF.
 - (d) The building setback from the residential activity remains at 20m.

CONCLUSIONS

153. My overall conclusion is that the proposal to rezone the land will achieve the purpose of the Act for a number of reasons. In particular:

- (a) Despite the presence of LUC2 soils, detailed assessments have identified a range of constraints that make agricultural production impractical and not economic on the PC19 site;
- (b) there are no other reasonable or feasible options for providing the same level of capacity in the locality and market without using NPS-HPL; and
- (c)
- (d) In terms of clause 3.6 of the NPS-UD the business rezoning is required to provide sufficient capacity in an area already defined as constrained with shortage of industrial zoning;
- (e) it clearly achieves a well-functioning, well serviced (infrastructure) environment;
- (f) will be the best use of the land;
- (g) adds value to the city business economy;
- (h) does not adversely affect other parties in a manner that cannot be mitigated;
- (i) makes efficient and economic use of infrastructure;
- (j) achieves all the outcomes sought by the NPS-HPL and NPS-UD where HPL land is involved; and
- (k) it satisfies the provisions of NPS-UD subpart 2, 3.8 Unanticipated or Out of Sequence Developments.

Dated 2 October 2025

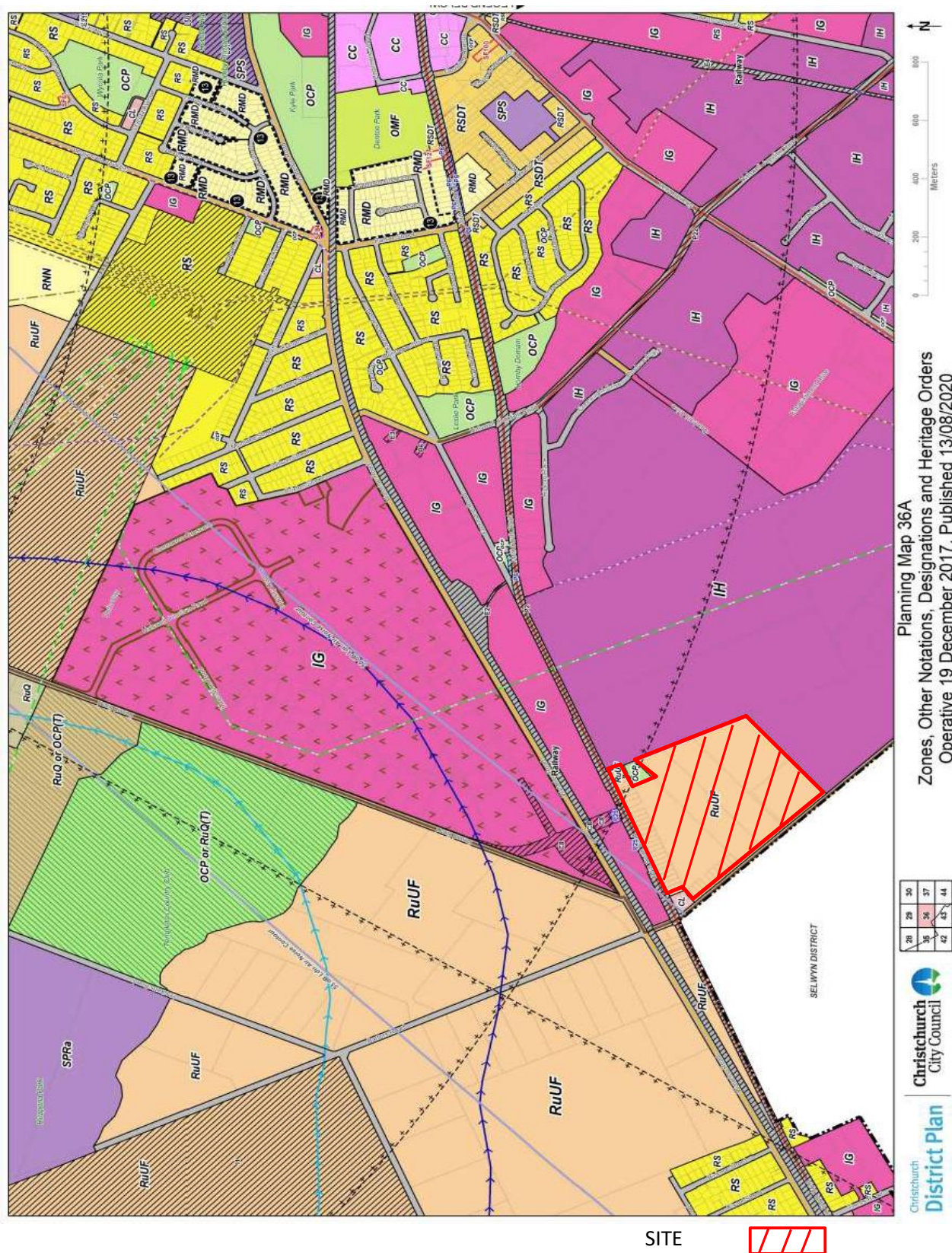


Kim Philip McCracken

ANNEXURE 1 – SITE PLAN

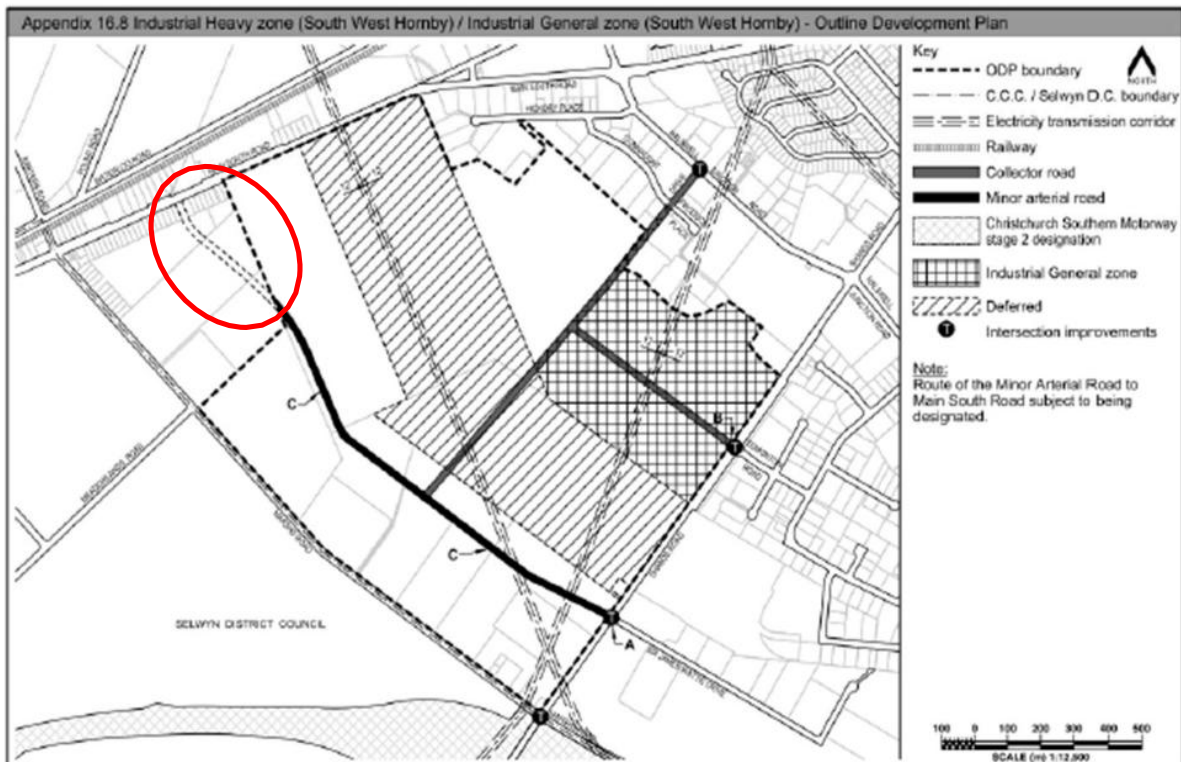


ANNEXURE 2 – CURRENT ZONING PLAN

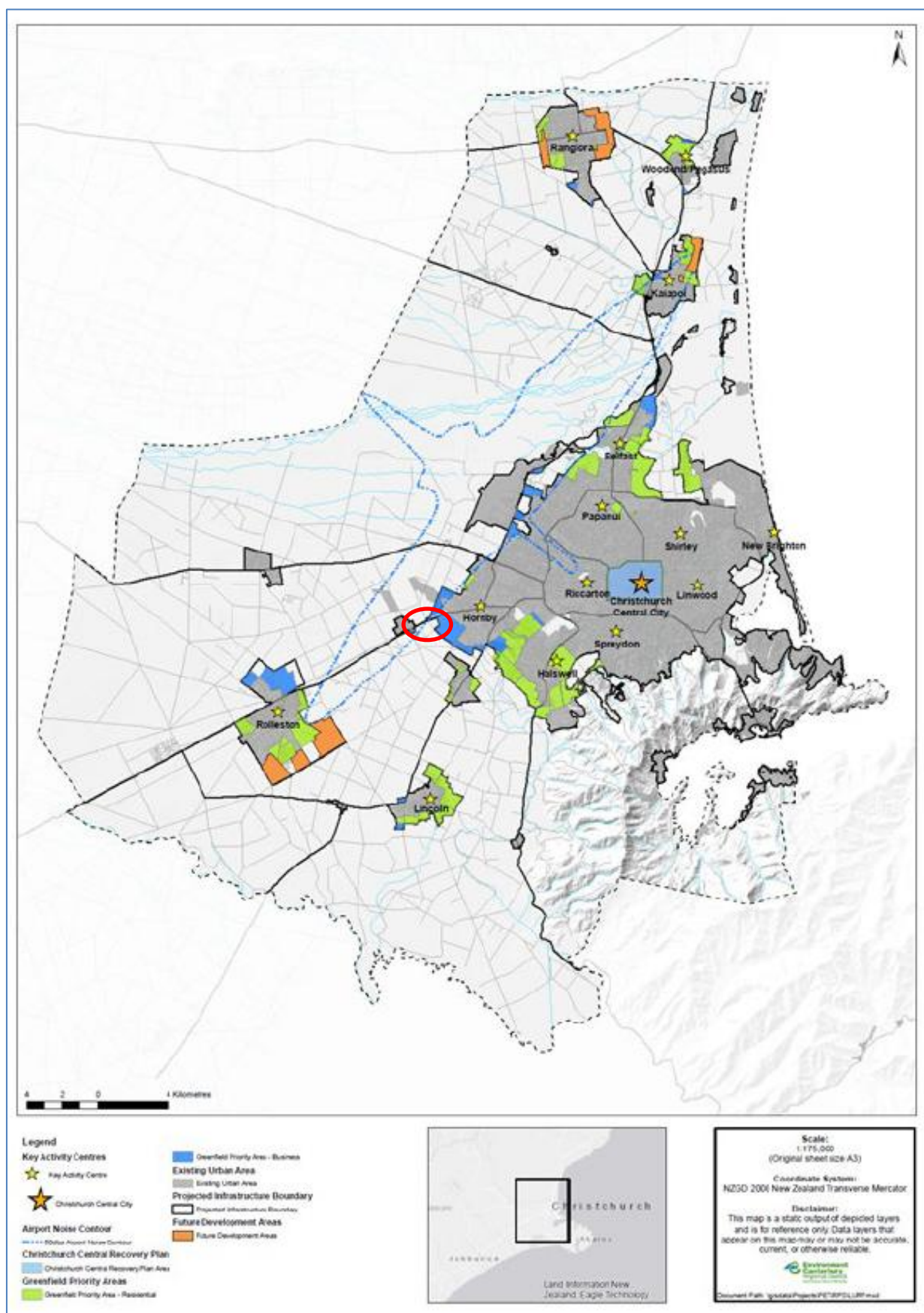


ANNEXURE 3 – IHP DECISION

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



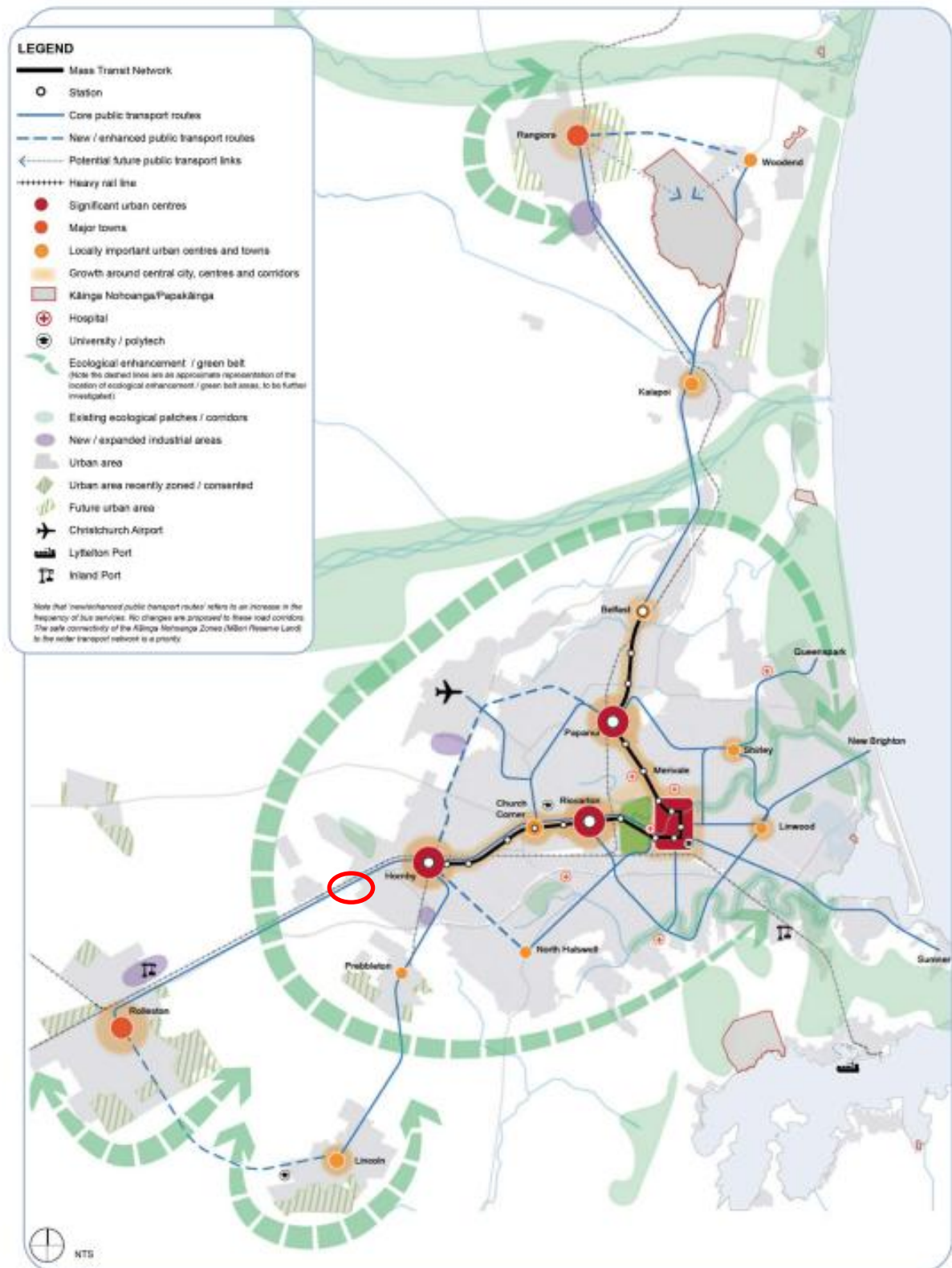
ANNEXURE 4 – REGIONAL POLICY STATEMENT – MAP A





ANNEXURE 6 – GREATER CHRISTCHURCH SPATIAL PLAN – MAP 14

Map 14: Broad locations of housing and business development capacity (700,000 people)^a



ANNEXURE 7 – GREATER CHRISTCHURCH SPATIAL PLAN – MAP 13

Map 13: Key employment areas and economic assets

