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The Senior Policy Planner
Christchurch City Council
PO Box 73012
Christchurch 8154
Attn: Kirk Lightbody
(by email only: kirk.lightbody@ccc.govt.nz)

Dear Kirk,

Re: P.P.C 19 – Marshs Road

We refer to your request of June 2025 and respond as follows.

1) Landscape

- The S32A report incorrectly captured the conclusions of the Landscape Assessment Report by solely focusing on the effects on the residents along the southeast side of Marshs Road and did not distinguish between short and longer term effects (see 2 over). This has been amended.
- It is anticipated that these 34 dwellings will eventually be developed for industrial use. Therefore, the potential degree of adverse visual effects will vary and decline depending on what properties are developed and given. There are numerous scenarios that could occur depending on the number of dwellings at any one time. However, without a clear idea of what that pattern of development looks like it is difficult to ascertain the degree of adverse effects. The applicant is happy to discuss further with the Council.

2) Visual Effects after 10 years – 34 Dwellings fronting Marshs Road and SHNo1

Following on from the above, Residential Properties:

- A moderate to moderate-high degree of adverse visual effects on the residential properties along both Main South Road and Marshs Road will result. These effects will be higher on any residents that remain after 10 years.
- Once the industrial development replaces the residential properties, future development enabled by the PPC will have a low-moderate to moderate degree of adverse visual effects on the residential properties along the southwest side of Marshs Road (Refer Annexure E).

The assessment (I am advised by the landscape architect) after 10 years would only result in a series of hypothetical outcomes, likely or not depending on any on-going reduction in the number of residential properties. If the Council still wishes to have these hypothetical scenarios covered this can be done but is not seen as being entirely grounded in both timing and reality.

3) Maps

These have been amended to exclude the Islington Reserve and the Commercial zoned properties at the intersection of Marshs/SHNo1. These properties have also been removed from Table 1 and amended plan/table/maps are included with an updated version of the PC19 document (forwarding).

4) Chapter 16 Industrial Objectives and Policies

An assessment of Chapter 16 was undertaken within the PC19 document (Section 4.2). This has now been expanded and set out in Attachment 4 and will be included in the PC document (section 9 – City Industrial Objectives and Policies).

5) Heavy Industrial Zoning

Consideration was given to re-zoning the land Industrial General. The Industrial Heavy Zoning was preferred because;

- i. It integrates better with the zoning on the north, east and south boundaries and as such there should be no adverse effects resulting on those frontages;
- ii. Services have been established (sized) to accommodate and connect with the existing IHZ.
- iii. The current zoning regime has been in place for many years and already contains development in accord with the HIZ.
- iv. That in terms of the uses permitted (HIZ and IGZ provisions) then the applicant understands that the limitations on water/sewer capacity,

would preclude a number of the more noxious activities from establishing especially those that use significant amounts of water (refer Attach 1);

- v. That there are established areas around the City where IHZ zoning adjoins/fronts residential zoning. As such it is assumed/accepted that the additional standards/limitations put on activities in the IH zone, eg noise, lighting, access, boundary setbacks and some more sensitive zones are sufficient;
- vi. Provides the opportunity for established activities to expand/redevelop in terms of the IHZ;
- vii. In addition the height, setback, noise and other bulk and location standards are not significantly different between the two zones. Some of the potential uses may be but in the context of this area there is almost no likelihood of these establishing, eg, water and wastewater capacity issues. Refer attachment 1;
- viii. Some additional mitigation provisions are proposed in this area to protect existing residential activity;
- ix. Long term it is anticipated that residential activity will be replaced by roading and IH zoning; and
- x. The analysis identified the need for and likely shortfall of HIZ in this area. Industrial General zoning would not meet those needs.

6) Iwi

Consultation is underway with the Iwi through MKT. MKT has agreed to undertake the assessment. We will forward when complete.

7) Ecan/Ground Water

No direct consultation has been undertaken with Ecan. Consultation has been undertaken with the CCC. The CCC has confirmed that the development can use the Global stormwater Discharge Consent CRC252424 as per the first stages of the Hornby (Calder Stewart) development (Refer Attach 1).

8) Consultation

Two drop-in sessions for the residents were held. All the residential neighbours fronting Marshs/SHNo1 were pre-circulated with a notice, and an information document and times. The dates were 11 April 2024, 6-7pm and 20 April 2024, 10-11 am (Refer Attach 2). In addition the applicant has been consulting with the City Council and NZTA for around two years.

The names and addresses of those who attended/provided feedback are set out (Attach 2) and in summary the issues raised were (other than property purchase):

- Absence of need for more industrial land,
- Change of setting – rural/urban to industrial,
- Lighting/noise,
- Rates increases,
- Been involved of process in past – felt a little hard done by, and
- And as set out in the summary documents attached (Attach 2)

In terms of s32 no major changes were made to the PC. The outcomes and matters raised were anticipated and formerly addressed through the process.

9) National Policy Statement – HPS-HPL Policy 3.6(i)(a)(b)and(c)

Policy 3.6 sets out the circumstances where urban rezoning of highly productive land may be allowed being:

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

Comment

This matter is addressed in two of the Annexures, namely Annexure B (Property Economics) and Annexure C (Research report Industrial Land Supply Colliers Ltd).

In summary these two reports have concluded:

Annexure B – Economic Assessment

7. Summary

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

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

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

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

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

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

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

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

Annexure C – Land Supply

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

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

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

The next preferred location is Rolleston.

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

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

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

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

All of the analysis in this report produces the most optimistic picture because the 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%.

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

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

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

Annexure J – Potential Loss of Productive Land

This report concludes:

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

7.1 Introduction

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

7.2 Clause 3.6 Rezoning Criteria

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

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

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

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

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

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

- a. The site is not considered HPL under Clause 3.4 of the NPS-HPL due to its location.*
- b. There are multiple long-term constraints on the capacity of that site to support primary production activities.*

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

Annexure I – Agricultural Report

This report concludes:

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

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

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

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

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

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

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

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

Clause 3.6(4)(c) requires that there are no demonstrable environmental, social or cultural effects that outweigh the loss of productive land. The social effects will involve the likely eventual loss of residential activity but this is balanced against the importance of the location to the IHZ business and employment opportunity.

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

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

- has the potential to put downward pressure on industrial land prices.

10) Transport

Refer Attach 3 - Apparently no issue

11) Water Supply – Fire Fighting

Refer Attach 1 – the applicant recognises that the Council water supply will provide a maximum fire water classification of FW3

12) Waste Water

Refer Attach 1 – the restriction on waste water discharge is accepted and expected.

13) Stormwater

Refer Attach 1 – The existing CCC drain and rapid soakage system exists on the private property at 689 Main South Road. This takes stormwater discharges from the Main South Road and disposes into land via rapid soakage. The system will be decommissioned and then incorporated into the internal stormwater network, treatment and disposal system for the entire development.

Many thanks,



Kim McCracken
Director

Attachments:

1. Stormwater, waste water, water supply response
2. Consultation documents
3. Transport response
4. Chapter 16 review