

**SECTION 32  
INDUSTRIAL CHAPTER**

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## **1.0 CONTEXT**

### **1.1 INTRODUCTION**

1. A well-functioning and growing industrial sector is fundamental to Christchurch's recovery, and the long-term economic development of the Canterbury Region. The role of the Christchurch District Plan is to assist this recovery and ongoing development to occur within an efficient regulatory environment (under the Resource Management Act 1991 (RMA)). A parallel role is to ensure that environmental quality is maintained and where possible enhanced (refer to Strategic Directions chapter, Objective 3.61 'Recovery and Long-term Future of the District').
2. This report has been prepared to fulfil the obligations of the Council under the RMA and the Bill with the following being an evaluation in relation to 'policy approach' (including an evaluation of objectives, policies, rules and other methods) of the proposed District Plan Review (hereafter referred to as the District Plan Review). This report should be read together with the text of the proposed District Plan itself and the Section 32 for the Commercial chapter, which reflects the inter-connectness between issues and the policy framework for managing commercial activities across the City.

### **1.2 PURPOSE AND SCOPE OF THE INDUSTRIAL CHAPTER**

1. The purpose of the Industrial chapter is to:
  - a. provide a streamlined, focused and updated framework and process for the use and development of industrial areas and the location of new industrial activities;
  - b. provide certainty and clarity around the rules and standards that apply to industrial activities;
  - c. provide economic and employment opportunities generated by industrial development, and maintaining the city's natural assets and amenity;
  - d. match the rate of development with the availability of sewer, water, transport and other infrastructure; and
  - e. ensure there is a sufficient supply of suitably located and serviced land for a range of industrial uses, including through redevelopment of existing industrial areas.
2. These purposes are not dissimilar to those of the operative District Plan. However, in reviewing those provisions, a number of changes have been identified that will assist with Canterbury's recovery. In particular there is a need to:
  - a. re-focus the objectives and policies so they specifically recognise and respond to recovery issues and identify opportunities to remove unnecessary regulatory controls (i.e. reduce consent and notification requirements);
  - b. update the provisions (some being nearly twenty years old) to reflect the direction of relevant statutory documents, in particular the Land Use Recovery Plan (LURP) and Canterbury Regional Policy Statement (CRPS); and
  - c. streamline the industrial provisions of the current Christchurch City Plan to overcome the complexity that has arisen due primarily to a series of ad hoc private plan changes.

### 1.3 STATUTORY CONSIDERATIONS UNDER THE RMA

1. This report has been prepared in accordance with the matters to be considered by a territorial authority when undertaking a review of its District Plan in accordance with sections 74(1), (2), (2a) and (3), 75(3) and (4) of the RMA.

### 1.4 STRATEGIC PLANNING DOCUMENTS

1. Those provisions that have been specifically taken into account or have been had regard to in this chapter are summarised in the table below and the provision and the key provisions are set out in full in Appendix 1.

	<b>Strategic planning document</b>	<b>Relevant provisions</b>	<b>Where and how the Industrial chapter will take into account/give effect to the relevant provisions</b>
a.	Canterbury Regional Policy Statement (CPRS);	Chapter 5 Objective 5.2.1	Gives effect by: <ul style="list-style-type: none"> <li>- consolidating development in appropriate locations within existing urban areas;</li> <li>- avoiding adverse environmental effects of industrial activities;</li> <li>- ensuring linkages between development and the delivery of infrastructure; and</li> <li>- planning the location of industry so as to minimise conflicts between incompatible activities.</li> </ul>
		Chapter 6 Objective 6.2.6	Gives effect by: <ul style="list-style-type: none"> <li>- providing for development and redevelopment of industrial areas as a vital component for recovery and growth;</li> <li>- providing for the utilisation of existing infrastructure by ensuring new industrial areas are appropriately located, while being in close proximity to the labour supply and freight routes; and</li> <li>- managing reverse sensitivity effects through the location of industry and other activities.</li> </ul>

b.	Canterbury Earthquake Recovery Strategy	Economic Recovery Programme	<p>Consistency is achieved with the following provisions:</p> <ul style="list-style-type: none"> <li>- <i>“Enable a business-friendly environment that retains and attracts business”</i> (Economic Recovery Programme). The chapter provides the market with choices of where industry locates while retaining existing industrial areas for primarily industrial development;</li> <li>- <i>“Identifying and facilitating increased opportunities for early and substantial local and international investment”</i> (Economic Recovery Programme). The chapter provides a range of areas for new subdivision and development; and</li> <li>- <i>“Zoning sufficient land for recovery needs”</i> (Built Environment Recovery Programme) through the DPR. The chapter zones greenfield areas identified in the LURP to provide for future growth to 2028.</li> </ul>
c.	The Land Use Recovery Plan (LURP)	Action 8	<p>Consistency is achieved with the following provisions:</p> <ul style="list-style-type: none"> <li>- Providing for the development of greenfield priority areas that are not already zoned through rezoning as part of the DPR (Action 8, LURP);</li> <li>- Maintaining the role of existing industrial areas, zoned business, for Industrial activities (Action 24, LURP);</li> <li>- Providing for comprehensive developments in existing business areas including brownfield sites (Action 24, LURP); and</li> <li>- Including Outline Development Plans (ODP) and zoning provisions for the Hornby and Belfast Greenfield Priority Business Areas along with zoning provisions for other identified greenfield priority areas as a part of the DPR (Action 24, LURP);</li> <li>- Supporting an integrated approach to greenfield priority areas for business located near the airport; and</li> <li>- Establishing thresholds for commercial activities in greenfield priority areas to avoid reverse sensitivity effects or effects</li> </ul>

			on the viability of Key Activity Centres (KACs) (Action 24, LURP).
d.	The Iwi Management Plan (IMP)		<p>The Chapter has had regard to the following provisions:</p> <ul style="list-style-type: none"> <li>- encouraging the use of indigenous species in landscaping and planting;</li> <li>- protecting waahi tapu waahi taonga including springs; and</li> <li>- ensuring treatment of stormwater.</li> </ul>

## 1.5 PROPOSED DISTRICT PLAN: OVERVIEW AND SYNOPSIS

1. As set out in the Strategic Directions chapter, the general policy direction is to:
  - a. promote the utilisation and redevelopment of existing urban land;
  - b. provide additional land for urban activities within planned new urban areas that meet anticipated demand and enable the efficient and affordable provision and use of new and existing infrastructure;
  - c. limit the adverse effects of activities on the efficient and effective functioning, maintenance and upgrading of infrastructure, including reverse sensitivity effects;
  - d. ensure new activities and development does not create significant health, nuisance or other adverse effects for people or the environment;
  - e. prevent sensitive activities establishing near lawfully established activities that generate noise, odour and other adverse effects;
  - f. ensure new development is integrated with, and within, existing urban areas, transport networks and other infrastructure; and
  - g. safeguard water from the effects of land use.
2. The Industrial chapter gives effect to these strategic directions with two objectives:

### Objective 1

- a. The recovery and economic growth of the district's industry is supported and strengthened in existing and new greenfield areas.

### Objective 2

- b. Adverse effects of industrial activities and development on the environment are avoided, remedied or mitigated and the level of amenity anticipated in the adjoining zone is not adversely affected by industry.
- c. Industrial sites visible from the road have a higher level of visual amenity, particularly the Industrial General Zone (North Belfast) and Industrial Heavy Zone (South West Hornby) that are in highly prominent locations and act as gateways to the City.
- d. The cultural values of Ngāi Tahu/ manawhenua are recognised, protected and enhanced through the use of indigenous species in landscaping and tree planting, a multi-value approach to stormwater management in greenfield areas, and the protection and enhancement of waahi tapu and waahi taonga including waipuna.

3. The way in which these objectives will be achieved is set out in policies concerned with:
- a. ensuring a sufficient land supply to meet future demand;
  - b. enabling the redevelopment of industrial areas to support recovery;
  - c. providing a range of industrial locations including a General Industrial Zone, a Heavy Industrial Zone and an Industrial Park Zone, to meet different needs;
  - d. managing activities in Industrial zones to avoid impacts on industry;
  - e. avoiding office development in industrial zones;
  - f. supporting brownfield redevelopment to encourage the efficient use of land;
  - g. improving the visual amenity of industrial areas;
  - h. achieving a higher level of amenity and integrated approach to development and infrastructure delivery in greenfield areas; and
  - i. managing the effects of industrial activities on the environment.

Appendix 2 sets out the linkages between provisions.

## 1.6 RESEARCH

1. The Council has commissioned technical advice and assistance from various internal and external experts and utilised this, along with internal workshops and community feedback, to assist with setting the proposed District Plan framework for the Industrial chapter. This advice includes the following:

	<b>Title of report</b>	<b>Author</b>	<b>Date</b>	<b>Description of report</b>
a.	Report – <i>Proposed Christchurch City District Plan Commercial and Industrial Chapters Economic Analysis, Christchurch City Council</i> Refer to Appendix 9.3.	Property Economics Limited	November 2013	The report provides an evaluation of demand for industrial land against the current and future supply
b.	An Assessment on the Effectiveness of Existing Rules in the City Plan. Refer to Appendix 9.5.	Sinclair Knight Mertz	September 2013	An evaluation of selected industrial environments and consideration of the effectiveness of the City Plan in achieving the outcomes sought
c.	Workshop – Multi-disciplinary workshop with Council officers.	Christchurch City Council staff	September 2013	Internal workshop involving a number of staff from different disciplines reviewing different options for managing effects in industrial zones
d.	Document – <i>Survey of Manufacturers in eastern suburbs affected by the earthquakes</i>	Canterbury Development Corporation	2012	Survey from May–June 2012 of 70 manufacturers in the worst affected suburbs of Bromley, Woolston and Phillipstown

	<i>(Confidential)</i>			
e.	Report – <i>Evaluating the Efficiency and Effectiveness of the Christchurch City Plan</i>	Response Planning	January 2011	Report prepared in accordance with Section 35 of the RMA that reviews how effective the provisions of the Operative District Plan are.
f.	Document – <i>Review of the Landscape Treatment within Business/Industrial Zones with a Recommendation for Landscape Treatment within the proposed Awatea Business Area</i>	Christchurch City Council	Date unknown	Report on the effectiveness of rules in the City Plan on landscaping to inform recommendations for landscaping in a new industrial zone.

2. In addition to the above reports and advice, the Council has compiled, reviewed and developed a collection of material on issues (refer to Section 8.0 for a Bibliography). This information has been used to inform the DPR and this s 32 report.

## 1.7 CONSULTATION

1. During the pre-notification stage of drafting the Industrial chapter, a number of consultation meetings have been held.

### General stakeholders/public

2. Two sessions with stakeholders (industry, landowners, investors and other interested parties) were held on 22 and 29 August 2013, to seek community views on the proposed Industrial chapter. Key messages from the stakeholder sessions relevant to the Industrial chapter included the desire to:
  - a. encourage a dispersal of employment, business and commercial activity across the city;
  - b. provide certainty about the role of differently zoned areas; and
  - c. provide for small businesses in affordable locations by enabling a greater mix of activities in industrial areas.
3. Subsequent events have been held with the community over February and March 2014 on the draft Industrial chapter. Feedback has raised a number of issues including
  - a. the appropriateness of restrictions on non-industrial activities in industrial zones;
  - b. how effects from industry at the interface with residential activities can be better managed;
  - c. traffic and parking problems associated with existing industrial areas; and
  - d. potential impacts on natural resources, particularly, the unconfined/semi-confined aquifers.



## **Strategic partners**

4. Meetings were also held with staff from the Canterbury Earthquake Recovery Authority (CERA), Environment Canterbury and Mahaanui Kurataiao Limited, in preparation of the draft chapter to outline the direction of the chapter and invite their feedback. Matters raised in the context of the Industrial chapter included:
  - a. managing office and retail activity to avoid undermining the centres-based approach for commercial activities;
  - b. the approach to managing different activities that fall within the scope of 'industrial activity' by controls on scale, form and amenity, rather than prescribing the activity status of different types of industrial activity;
  - c. enabling emergency services and providing direction for the rebuilding of their facilities;
  - d. the adequacy of information on the location and quantum of industrial land in the eastern suburbs and its future role; and
  - e. managing reverse sensitivity effects including consideration of the types of activities that can co-exist and where mixed-use can be actively encouraged.

## **Collaborative advisory group and Christchurch Joint Officials Group**

5. The Collaborative Advisory Group comprising representatives of the Canterbury Regional Council, Selwyn District Council, Waimakariri District Council, CERA, NZ Transport Agency, Ngai Tahu and the Ministry for Environment (in an advisory role) and Christchurch Joint Officials Group (CJOG) have provided feedback on the Industrial chapter including:
  - a. whether the types of industrial activities (e.g. light versus heavy industrial activities anticipated in different industrial zones) should be differentiated in the 'activity lists' or whether the level of effects and amenity anticipated in different zones is the method of managing where different industrial activities locate;
  - b. the need for plans to be up to date to reflect the Christchurch Central Recovery Plan (CCRP);
  - c. whether greenfield areas in the north west are to be rezoned as part of Phase 1/Phase 2 to the DPR and how an integrated approach is being taken to these areas;
  - d. integration between land use and infrastructure, particularly in greenfield areas;
  - e. protection of groundwater resources through retaining existing controls specific to sensitive areas on the use and storage of hazardous substances;
  - f. impacts of greenfield development on the wider road network;
  - g. Provisions being required to enable repair and rebuilding activity
  - h. Positive support needed for residential development of brownfield sites, by way of Discretionary activity status
  - i. Questioning the need for some built form standards e.g. ancillary offices to be at the front of a site, particularly in recognising the difference in character of zones
  - j. Subzones and their detailed requirements associated with them should be addressed through the subdivision process.
  - k. Encouraging innovation in design and providing for resilient or energy efficiency buildings

- l. Requirements for consent for assessment of design are best considered through standards for permitted activities.

### **Runanga focus working group**

6. Ngai Tahu and the Runanga representing the Christchurch City Rohe have also provided input by way of a Runanga Focus Working Group, which has made comments on the Industrial chapter. This has included the following feedback on:
  - a. the importance of indigenous species in landscaped areas;
  - b. the creation of water bodies and whether they are allowed to be included in locations close to the flight paths;
  - c. protection of springs and other waahi tapu me waahi taonga, particularly in the planning of greenfield areas;
  - d. recognition of silent file areas and protection of sites of significance to the Runanga;
  - e. maintaining separation between stormwater facilities and waterways;
  - f. avoiding the discharge of wastewater or stormwater to waterways; and
  - g. recognition of drains as waterways that should not be used for the conveyance of untreated stormwater.


### **Land use recovery forum of manufacturers from Woolston and Bromley**

7. On 16 August 2013, a presentation was given to a forum established by Canterbury Development Corporation (CDC) and involving Christchurch City Council, the Canterbury Regional Council, CERA and representatives from the business community in Woolston and Bromley (including manufacturing companies that currently operate in these areas). The forum was established to give effect to Action 27 of the Draft Land Use Recovery Plan, being to

*“Continue the existing case management approach by councils and the Canterbury Development Corporation to support rebuilding through relevant LGA (Local Government Act) instruments particularly for damaged business areas (including B4/B5 land in Woolston and Bromley; and key brownfield sites, including potentially redundant KiwiRail land)”*.
8. A key issue raised in the forum was reverse sensitivity effects on existing industrial activities. Concern was expressed regarding the ability for non-industrial activities, particularly retail activities, to locate in these areas. A subsequent meeting with the New Zealand Manufacturers and Exporters Association on 21 August 2013 provided an opportunity for discussion about the different options available for managing activities in industrial areas, and how reverse sensitivity effects could be minimised.

9. A subsequent meeting was held on 26 March 2014 when feedback was invited from the same group on the draft Industrial chapter. Key messages from the discussion included:
  - a. the need to retain areas for industry and to avoid the encroachment of further non-industrial activities into industrial zones;
  - b. support for a restrictive approach to retail activity in industrial zones;
  - c. general support for offices to be restricted in scale in industrial zones, while also commenting that larger amounts of floor space may be required above the thresholds proposed;
  - d. concern to manufacturers of warehouses with a shop front being used primarily for retailing; and
  - e. landscaping controls appropriate to the context.

## **1.8 SCALE AND SIGNIFICANCE**

1. Section 32 (1) (c) of the Act requires that this evaluation report contains a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.
  2. For this chapter an assessment of the scale and significance is made at the end of the description of resource management issues. The proposal is taken to mean, in the context of this chapter, the objectives, policies, rules and other methods arising from each of these issues.
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## 2.0 RESOURCE MANAGEMENT ISSUES

1. The resource management issues have emerged from a range of sources including:
  - a. feedback from stakeholder engagement;
  - b. issues identified in higher order documents; and
  - c. issues that have arisen from administration of the operative District Plan.
2. Four issues have been identified.

### RESOURCE MANAGEMENT ISSUE 1 – Ensuring that the demand for land can be met to accommodate future industrial growth and to support the recovery

1. There is a need to ensure an adequate supply of land to meet future demand and also provide the market with:
  - a. choice in where land is available as companies have different requirements as to where they locate;
  - b. flexibility to meet the different needs of industry, for example, the provision of adequate greenfield land that can be subdivided according to the needs of individual companies; and
  - c. suitable land that is adequately serviced, accessible, in proximity to a labour force and appropriate on which to develop.
2. The LURP identifies greenfield priority areas, additional to existing urban areas to meet growth to 2028. There is a need to ensure that the areas in LURP are zoned (Action 19) and infrastructure aligned with development to accommodate existing Canterbury businesses seeking to relocate, while also attracting new business to the city.
3. In terms of supply, the following overview demonstrates there is a significant quantum of land identified and proposed for rezoning through the DPR.

#### Supply

4. The current supply of vacant industrial land is estimated to comprise 353ha as at June 2012 (Property Economics, 2013). This includes the following greenfield priority areas identified in the LURP, which were rezoned for industrial use as at June 2012.
  - a. “South West Awatea” (Business 7 zoned land off Wilmers Road) 25ha.
  - b. “Wigram” (off Haytons Road) 43ha.
5. In addition to the 353ha, there are greenfield areas identified in the LURP that have been rezoned since June 2012 or are identified for rezoning as summarised in the table below:

Area name	Status	Size
Belfast (B5)	To be rezoned as part of DPR	95ha
North West Area (B6 – B8)	To be rezoned as part of DPR	100ha
North West Area (Memorial Ave)	To be rezoned as part of DPR	19ha
Islington Park (Waterloo Business Park)	Rezoned to Industrial in 2012	80ha
Hornby (Main South Road)	To be rezoned as part of DPR	23ha
Hornby West (Calder Stewart)	To be rezoned as part of DPR	171ha

Hornby South	Part rezoned since June 2012 (39ha) Additional area to be rezoned as part of DPR (20 ha)	60ha
Templeton (Cookie Time)	To be rezoned as part of DPR	5ha
<b>Total:</b>		<b>553ha</b>

6. In summary, an additional 119ha has been rezoned since June 2012 with an additional 434ha identified in the LURP. Combining this with the quantum of existing vacant land, there is in the order of **906 ha** in Christchurch City, with additional areas identified in Selwyn and Waimakariri Districts. This equates to between 30 and 40 years of supply at current rates of take up.

## GENERAL DIRECTION

7. The Strategic Directions chapter has the following policy direction:
- a. to promote the utilisation and redevelopment of existing urban land; and
  - b. to provide additional land for urban activities within planned new urban areas that meet anticipated demand and enable the efficient and affordable provision and use of new and existing infrastructure.
8. In a strategic context, the LURP and Chapter 6 of the CRPS also provide a clear direction:
- a. *To ensure there is sufficient and suitable industrial land for the recovery through to 2028, this land has been identified primarily for industrial use (LURP, s 4.3.2 'Provide for Industrial needs').*
  - b. *Avoid urban development outside of existing urban areas or greenfield priority areas for development (Objective 6.2.1 (3), Chapter 6 of CRPS).*
  - c. *The Recovery Plan (LURP) identifies greenfield priority areas for business... Combined with other vacant industrial land in existing zones, the greenfield priority areas will be sufficient to meet future demand as well as allowing for choice of location and market competition (LURP, Section 4.3.2 'Provide for Industrial needs').*
  - d. *"Christchurch City Council to enable in the next review of its district plans the following measures:*
    - VII. *outline development plans to establish the broad land use pattern within the Hornby and Belfast greenfield priority areas for business shown on map A, appendix 1, including consideration of wider connectivity to surrounding areas and networks.*
    - VIII. *an integrated approach to greenfield priority areas for business that are located near Christchurch Airport*
    - IX. *zoning provisions for other greenfield priority areas for business shown on map A, appendix 1" (LURP, Action 24).*
    - X.

## SCALE AND SIGNIFICANCE

9. The policy direction of ensuring sufficient industrial land reflects higher order documents including the LURP, which requires that zoning provisions are developed for greenfield

priority areas. In effect the options are subtle variations on the same theme of rezoning land to ensure a sufficient supply. Even options around the timing are limited, with Action 24 above to be completed as part of the DPR.

10. Industrial land supply is a matter of regional, if not national significance. The amount of land zoned for industrial development will be a factor in determining the cost of setting up new enterprises in Christchurch—one of the country’s largest industrial centres. This in turn will have downstream effects on the pace of the recovery, employment creation and regional economic development.
11. The rezoning of land and availability of additional areas for accommodating growth will also affect:
  - a. Existing landowners in greenfield areas whose land is proposed for rezoning. In circumstances where the use of the land is for rural or residential activities, the rezoning does not preclude those activities from continuing (subject to existing use rights).
  - b. Landowners adjoining greenfield priority areas  
For landowners adjoining or in the vicinity of a greenfield priority area, the rezoning will see a land use change that may have a potential effect including visual, traffic or other environmental effect. These effects can be addressed through rules for greenfield areas and the preparation of ODPs to guide future development and its integration with infrastructure delivery.
  - c. Landowners of existing industrial zoned land  
The effect of rezoning greenfield priority areas and increasing supply potentially reduces demand for existing zoned land in built-up areas. This can affect the price of land, which can impact on the economic well-being of landowners. However, for the community, the provision of more land supports their well-being by providing for more employment opportunities in the future.
12. The above matters have been taken into account in determining the level of detail in the analysis.

## **RESOURCE MANAGEMENT ISSUE 2 – Non-industrial activities have the potential to restrict opportunities for industrial activities to establish/operate**

1. Demand for office and new retail activities (particularly large format stores and trade suppliers) in suburban industrial locations has led to an increased take up of industrial land, and in some instances reverse sensitivity effects. This has been largely due to:
  - a. the earthquakes displacing businesses from established commercial centres, which have been able to relocate under the provisions of the Order in Council (OIC)<sup>1</sup>;
  - b. changes in consumer preferences in terms of where people work/shop (market demand);
  - c. a trend among goods distributors to embrace larger store formats than previously utilised, which has resulted in demand for larger sites in traditionally industrial areas;
  - d. evolving changes in industrial activity, including a reduced emphasis on manufacturing

<sup>1</sup> The Canterbury Earthquake (Resource Management Act Permitted Activities) Order 2011.

- activity resulting in the broadening of uses;
- e. cheaper floor space in industrial areas, with more opportunity for customer parking; and
  - f. changes in technology and email services, enabling professional and other business activities to operate in a range of areas; and
  - g. a permissive planning regime in the operative City Plan.
2. A Monitoring Report prepared for the Council under s 35 of the RMA in January 2011<sup>2</sup> highlighted the pressure for non-industrial development in “*newer or unique industrial zones such as the Business 4, 4T and 4P zones*”. There was concern expressed at the time that the different floor space thresholds inserted into the City Plan through Variation 86 were unlikely to be effective and it was concluded that “*it (Variation 86) has not effectively stopped the development of retail activity in industrial zones*”.
  3. In August/September 2013, site visits were undertaken to a selection of industrial zones to understand the types of land use activities being carried out. That survey identified specific areas where an agglomeration of office or retail activity had emerged. This reflects the existing District Plan rules framework, which permits offices in the Business 3B, 4, 4T and 8 Zones and provides for retail activities up to 2000m<sup>2</sup> per site in some industrial zones. The OIC also enables the establishment of retail and office activities in locations outside centres for a temporary period until April 2016.
  4. The LURP (p14) states “*most businesses with damaged office and retail premises have found alternative temporary or permanent accommodation. Some relocated close to the CBD or to suburban and satellite centres. Others moved into industrial zones, exacerbating a trend that began before the earthquakes and has heightened concerns about ‘reverse sensitivity’*”. The future location of these businesses will be assessed on an individual basis when their approvals to remain under the OIC are lodged.
  5. The issue of offices and retail activities location in industrial areas has been highlighted in a report by Property Economics (*Proposed Christchurch City District Plan Commercial and Industrial Chapters Economic Analysis*, Christchurch City Council November 2013), referred to hereafter as ‘the PEL report’). The PEL Report concludes that continuation of this trend has the potential to:
    - a. erode the land resource for industrial activities, including areas serving a specific need;
    - b. contribute to the less efficient use of land and infrastructure by constraining the ability for industrial activities to operate (as a result of reverse sensitivity effects);
    - c. result in disjointed land-use patterns that reduce opportunities for agglomeration benefits and the wider competitiveness of Christchurch in a regional and national context;
    - d. reduce accessibility by a range of transport modes to commercial activity due to activities being in locations that are not as accessible; and
    - e. displace industrial demand to other locations that may not meet the locational requirements and preferences of business. Some companies may as a result choose to

<sup>2</sup> Response Planning Consultants Ltd (28 January 2011), “Evaluating the Effectiveness and Efficiency of the Christchurch City Plan: Project Report”, p89.

<sup>3</sup> Property Economics Ltd (November 2013), “Proposed Christchurch City District Plan Commercial and Industrial Chapters Economic Analysis, Christchurch City Council”.

relocate to other areas in Canterbury, the South Island or New Zealand.

And that:

- f. increased land prices will reduce the viability for industrial companies to buy or lease land intended for industrial activities; and
- g. planning and investment in infrastructure is not effective in serving the requirements of industry. It also leads to the inefficient use of infrastructure and contributes to higher costs.

## Retail

- 6. The PEL report indicates that between the years 2000 and 2009, there was no real trend of increased retail activity in industrial zones although a total of 50,000 sq m of retail floor space was approved. However in 2010, the amount of floor space for retail and commercial service activities increased nine-fold from the previous year (to 14,600 sq m). The high level of floor space approved for retail and commercial services has remained significant over 2011 and 2012 with close to 29,000 sq m approved over the two-year period. In terms of location, some of the approved floor space has dispersed along Blenheim Road but is otherwise close to large centres such as Riccarton and Hornby.
- 7. The scale of retail activity in industrial areas has the potential to slow down the recovery of the Central City and suburban centres if not managed appropriately and PEL advises that *“the proposed District Plan should be unashamedly firm about non-centre retail development over the short–medium term to ensure that any such development is not undermining the rebuild of the CBD or the existing centre network, given the level of capacity in each”*.<sup>3</sup>
- 8. Consultation with industry representatives from the Bromley and Woolston industrial areas and Canterbury Development Corporation has flagged encroachment of retail activities into the industrial area as a key reverse sensitivity issue.

## Offices

- 9. The PEL report shows a trend between the years 2000 and 2009 of an increasing quantum of commercial office floor space approved in industrial zones, from four per cent of building consents in 2000 to 15 per cent in 2009 (percentage of all building consents in industrial zones). In the same period, an average of 10,000m<sup>2</sup> per annum of office floor space was consented within industrial zones (Table 9 of the PEL report summarises the quantum of commercial floor space consented in industrial zones). This represented 40 per cent of all commercial space consented in the period.
- 10. In the period since 2010 (the first earthquake being in September 2010), the amount of consented office floor space increased significantly, with an average of nearly 24,000m<sup>2</sup> per annum, representing nearly 60 per cent of all consented commercial floor space. In 2010 and 2011 the total floor space approved was 56,100m<sup>2</sup>, which is likely to be attributable to the relocation of businesses from the Central City.
- 11. This post-earthquake increase in the quantum of commercial floor space in industrial areas



is significant and this has been most prevalent in industrial zoned areas along Blenheim Road and in Russley as highlighted in Figures 14 and 15 of the PEL Report.

12. The distribution of resource consents and temporary accommodation approvals between 22 February 2011 (major earthquake) and July 2012 for office activities have been analysed. The locations of consented offices vary but can be grouped into the following:
  - a. edge of city, e.g. B4 (suburban light industrial land) land at Lincoln Road, Addington (two major new office blocks consented in 2012); and
  - b. suburban and city periphery, e.g. B4 land at Wairakei Road and Russley Road (North West).
13. A large number of temporary offices, which have no long-term rights, have also been approved under the Temporary Accommodation Order in Council. They range in size and location. Together with new permanent office blocks they are supporting displaced business and employment from the City Centre.
14. It is apparent from consents and Order in Council data that there is a significant dispersal of office and retail activity in industrial areas. If this trend continues there are implications for industrial land supply, recovery of the Central City and the ability of industrial businesses to undertake their activities without being unduly constrained by the co-location of incompatible, non-industrial activities.

#### **GENERAL DIRECTION**

15. The policy direction in the Strategic Directions chapter as stated earlier is to:
  - a. promote the utilisation and redevelopment of existing urban land;
  - b. limit the adverse effects of activities on the efficient and effective functioning, maintenance and upgrading of infrastructure, including reverse sensitivity effects;
  - c. ensure new activities and development do not create significant health, nuisance or other adverse effects for people or the environment; and
  - d. prevent sensitive activities establishing near lawfully established activities that generate noise, odour and other adverse effects.
16. The location of non-industrial activities including retail, offices and residential has the potential to be inconsistent with achieving these directions. Emphasising the importance of managing activities in industrial zones, the LURP and Chapter 6 of the CRPS provide direction on the appropriateness of non-industrial uses as follows:
  - a. Christchurch City Council to enable in the next review of its district plans the following measures –  
thresholds for commercial activities in greenfield priority areas for business where these are considered necessary to avoid reverse sensitivity effects or effects on the viability of key activity centres (Action 24, LURP).
  - b. “The Recovery Plan recognises that some types of commercial businesses – for example, yard based retailing – may also be appropriate in these areas” (LURP, Section 4.3.2 ‘Provide for industrial needs’).

- c. *Greenfield priority areas for business in Christchurch City provide primarily for the accommodation of new industrial activities (Objective 6.2.6 (1), Chapter 6 of CRPS).*
- d. *Areas used for existing industrial activities are to be used primarily for that purpose, rather than as a location for new commercial activities (Objective 6.2.6 (2), Chapter 6 of CRPS).*
- e. *Business activities are to be provided for in a manner which...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 (Policy 6.3.6 (5), Chapter 6 of CRPS).*
- f. *A range of other business activities are provided for in appropriate locations (Objective 6.2.6 (4), Chapter 6 of CRPS).*
- g. *Business activities are to be provided for in a manner which...recognise that existing business zones provide for a range of business activities depending on:*
  - (i) the desired amenity of the business areas and their surround; and*
  - (ii) the potential for significant distributional or urban form effects on other centres from new commercial activity (Policy 6.3.6 (6), Chapter 6 of CRPS).*
- h. Method to Policy 6.3.6  
*Territorial Authorities Will: ...*
  - (2) Identify trigger thresholds for office and retail commercial activities in industrial areas where these activities are likely to give rise to distributional effects, particularly on larger commercial centres, or result in reverse sensitivity effects.*

## **SCALE AND SIGNIFICANCE**

- 17. Having regard to the strategic context, a more restrictive approach is required to non-industrial activity in industrial zones providing a greater limit retail and office activities. Any options are therefore subtle variations.
- 18. This is a significant policy shift in the proposal from the current City Plan and the existing environment of industrial areas in so far as the current rules permit offices without restrictions in a number of industrial zones (B3B, B4, B4T, B8) and retail activities up to a limit of 2000m<sup>2</sup> per site and subject to the quantum of retail activity in the immediate area.
- 19. The use of land in industrial areas is affected by the policy shift, in the sense that landowners who may have aspirations to develop their sites for retail and offices may be unable to. This could be seen as an opportunity cost resulting from lost development opportunities. There could also be distributional costs as some businesses are required to locate in locations that are arguably less optimal.
- 20. The dispersal of retail and office activity is a significant issue that affects everyone, including
  - a. business—where they can locate and their access to the supply chain;
  - b. residents—their ability to access employment opportunities and meet their need for goods and services; and
  - c. visitors—their ability to access goods and services including tourism.

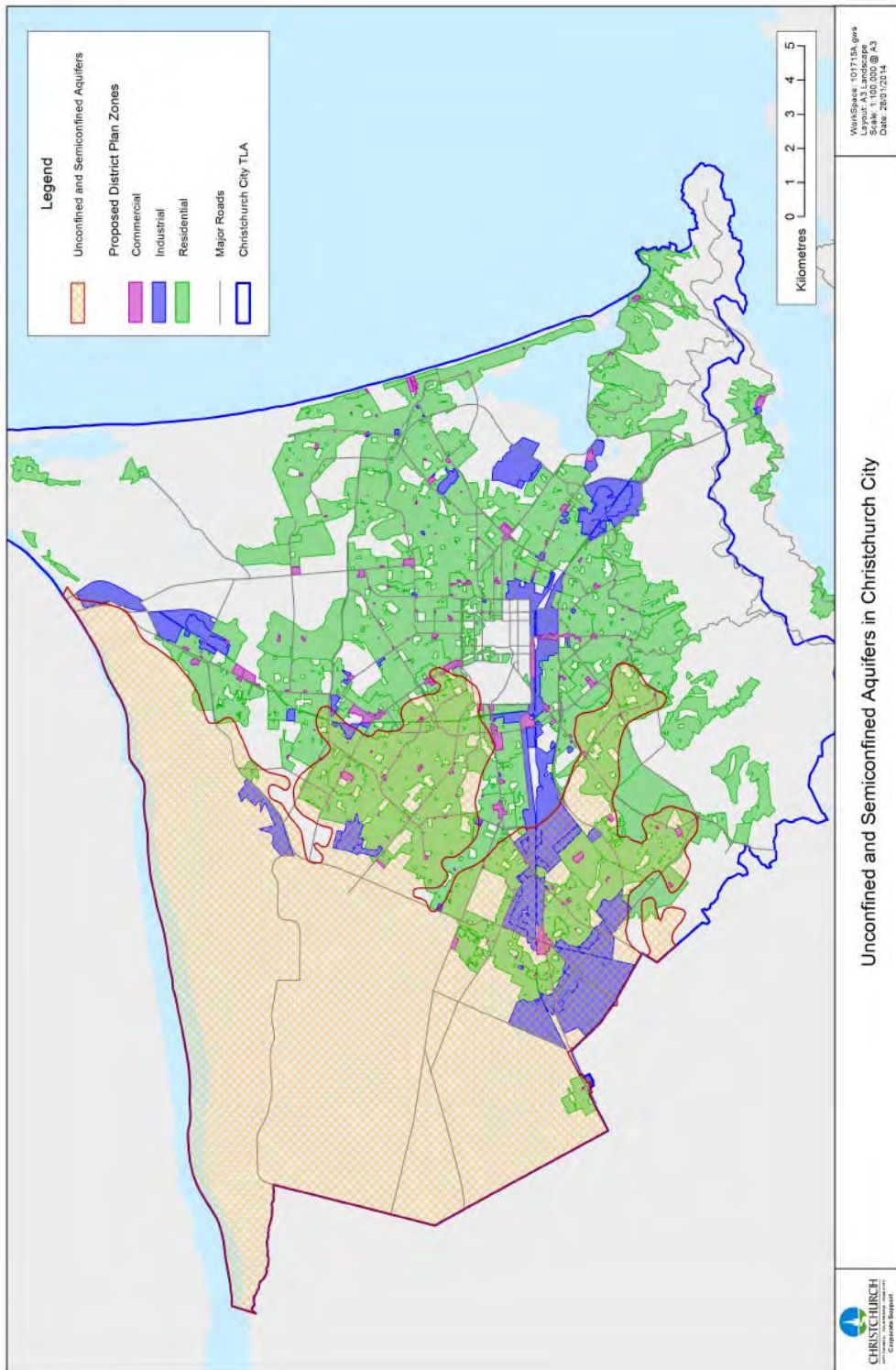
21. Effects of the policy shift therefore include:
  - a. effects on land values—industrial land is of a higher value for landowners if there is the opportunity for higher value uses such as offices and retail activity;
  - b. increased costs of locating in a commercial centre, including the Central City—the cost of land or rental values are generally higher in commercial centres and therefore business will have greater costs in establishing there;
  - c. the utilisation of physical resources including land and infrastructure if retailing and offices are located within centres. This includes public transport facilities, open space and community facilities, which themselves have a cost that is not necessarily factored into the market cost for land;
  - d. the potential agglomeration benefits associated with businesses in close proximity to one another and other secondary services that benefit from those businesses being in a centre, e.g. photocopying services; and
  - e. the lower value of industrial land provides for lower value industrial uses, which are otherwise forced to other areas due to the inflated value of industrial land, arising from a permissive policy approach.
22. Further analysis of the effects including benefits and costs is considered in the PEL report.
23. Dispersal of certain types of retail and office activities has the potential to undermine the recovery of the Central City and other commercial centres, resulting in less demand for land in these locations.
24. These are all significant issues and the analysis has been undertaken at a level of detail that reflects this.

**RESOURCE MANAGEMENT ISSUE 3 – A shift of industrial activity to the west has the potential to put pressure on infrastructure, raising uncertainty on the future role of industrial areas in the east, particularly given damage to land and buildings in that area.**

1. The earthquakes caused significant damage to land and buildings, particularly in the eastern suburbs. While not quantified, there is anecdotal evidence of industrial areas in Bromley, Woolston and Heathcote suffering damage, necessitating the demolition or rebuild of buildings in these areas.
2. The damage to buildings and land in the east and Central City has also led to a shift of businesses on either a temporary or permanent basis, including into the two adjoining districts. However, it is evident from the PEL report that the distribution of employment associated with industrial activities has been shifting from central areas over the last 12 years. The shift within the city towards the west and south-west fringe has been in the order of 18,000 employees between 2000 and 2012, with the trend in a post-earthquake environment exacerbating earlier trends.
3. Data on the uptake of vacant land also shows a trend of increasing development in the west, reflecting the availability of greenfield business areas for development, which has been

provided for in various growth strategies since 1999. The uptake rates have been highest in the north west, around the airport, and in the south west from Wigram to Islington. PEL attribute the growth in the western areas to its accessibility to trunk routes.

4. Notwithstanding the trend of a shift to the west, there is information from surveys by Canterbury Development Corporation of businesses wanting to stay in the east due to a number of locational benefits including:
  - a. proximity and good access to the Port;
  - b. infrastructure capacity—particularly wastewater; and
  - c. labour supply in the vicinity.
5. The areas of Woolston and Bromley are important for ‘wet’ industries, being those businesses that discharge significant volumes of trade waste to the nearby Bromley Treatment Plant. By being located close to the treatment plant, the costs of upgrading infrastructure in the west to manage higher flows is avoided.
6. Industrial areas in the west and south west are located over unconfined/semi-confined aquifers (see map on next page). To minimise the risk of contamination to the aquifers (i.e. the city’s water supply), the operative City Plan adopts a restrictive approach to wet industries and other activities involving the use or storage of hazardous substances in the south west.
7. There remains a need for land in the east to support business and provide local employment opportunities. However, this also needs to be balanced with the pressure for housing, and the direction in Chapter 6 of the CRPS to enable the redevelopment of suitable brownfield sites for housing or mixed use development (CRPS, Objectives 6.2.2(2), Objective 6.2.6(2), Policy 6.3.7(2) and (6) and Policy 6.3.8).
8. These issues are of citywide significance and scale and the level of detail in the analysis has considered this.



**GENERAL DIRECTION**

9. The Strategic Directions chapter has the following policy direction:
  - a. to promote the utilisation and redevelopment of existing urban land;
  - b. to provide additional land for urban activities within planned new urban areas that meet anticipated demand and enable the efficient and affordable provision and use of new and existing infrastructure; and

- c. to increase the housing development opportunities in the urban area to meet the intensification targets specified in the CRPS, Objective 6.2.2 (1), particularly in suitable Brownfield areas.

10. In a strategic context, the LURP and Chapter 6 of the CRPS also provide policy direction on the future use of industrial areas in the east with specific reference to Woolston and Bromley as follows -

- a. *“Territorial authorities, in collaboration with the Canterbury Development Corporation, to use a case management approach, through relevant instruments, to support rebuilding of damaged business areas (including Business 4 and Business 5 zoned land in Woolston and Bromley, and key brownfield sites in business zones”* (LURP, Action 31).
- b. *“Earthquake-affected industries that do not want to or cannot easily relocate, such as high infrastructure users in Woolston and Bromley, need to be supported to remain and, where necessary, rebuild in existing industrial areas”* (LURP, Section 4.3.2 ‘Provide for Industrial Needs’).

10. The LURP (Action 2) states that the Council in review of its District Plan is to enable *comprehensive residential and mixed use developments, including on brownfield sites* (LURP, Action 2). There is a limit to which the District Plan can use regulation to implement the LURP actions and consideration needs to be given to other methods instead of or as well as rules. In terms of general policy direction, the LURP and Chapter 6 provide direction to the extent that options do not include:

1. releasing all industrial land in Woolston and Bromley for alternative uses; and
2. retaining all land for industry and not considering the potential for brownfield redevelopment.

11. The policy approach in the chapter proposes to enable development of brownfield land for non-industrial uses under specific circumstances but the priority is to not erode the integrity of existing industrial areas in Woolston and Bromley.

## **SCALE AND SIGNIFICANCE**

12. The proposal is not a significant departure from the current plan that provides for the rezoning of business land for residential and other activities while recognising the function of industrial areas. It also enables the reasonable use of land by recognising that land may be appropriate for other uses.
13. Through appropriate controls, the policy direction is unlikely to have adverse effects that cannot be avoided, remedied or mitigated, e.g. avoiding the release of land that could lead to reverse sensitivity effects. The future of Woolston and Bromley as employment areas is an important issue and there are significant potential effects, both local and city-wide, that need to be considered in implementing a particular policy.

**RESOURCE MANAGEMENT ISSUE 4 – Amenity levels in established industrial areas have not been maintained or improved leading to poor environmental outcomes in some instances. This has the potential to result in land use conflict at the interface between industrial areas and more sensitive zones.**

1. By their nature, industrial activities can have significant adverse effects on the environment. These effects usually arise from discharges, emissions, the use and storage of hazardous substances, traffic generation, noise, and visual impacts. It is relatively straight forward to impose defensible standards where there is a risk to air (other than odour), water and soils. Requiring industrial businesses to achieve higher standards based on amenity is more problematic and can be difficult to justify where they could constrain industry to an extent that they are unable to operate efficiently. However, while people and communities generally understand that industrial areas will be of a lower amenity than residential or commercial areas, there is still an expectation that properties (and areas) in these and other environmentally sensitive areas retain an appropriate level of amenity.
2. The City Plan currently recognises that the amenity of industrial areas will be less than other areas of the city. Notwithstanding, it is anticipated there will be improvements to the general visual amenity of existing industrial areas, and a consequential reduction of adverse effects on adjoining or nearby sensitive zones.
3. The City Plan Monitoring Report concluded that amenity values in established industrial areas has remained unchanged with limited evidence of improvements.<sup>4</sup> The report suggests this reflects the low levels of development and redevelopment occurring in existing industrial areas, allowing little opportunity to incorporate amenity improvements.
4. The rebuilding of earthquake-damaged sites may facilitate visual amenity improvements in these areas. However, the s 35 report also noted that *“the City Plan would benefit from being clearer on the distinction between different amenity values expected in the business zones”*.<sup>5</sup>
5. The planning rules that influence visual amenity are building height, site coverage, setbacks and landscaping, and usually a combination thereof. Several investigations have been undertaken to assess the effectiveness of current provisions, particularly landscaping requirements.
6. A report was prepared evaluating the landscape treatment in existing industrial zones to inform recommendations on landscaping in the Business 7 Zone (Christchurch City Council). It was found that the requirement for a proportion of landscaping on a site was *“most often reduced”* relative to other landscape provisions, because it was mitigated by the location of landscaping, quality of landscaping and the openness of the frontage.

In October 2013, a separate review was also undertaken of resource consent decisions for Christchurch City. In summary, the review highlighted the large number of consents granted for non-compliance with rules requiring a proportion of the site to be landscaped.

<sup>4</sup> Response Planning Consultants Ltd (28 January 2011), “Evaluating the Effectiveness and Efficiency of the Christchurch City Plan: Project Report”, page 92.

<sup>5</sup> Ibid, page 95.

7. Site visits undertaken in August/ September 2013 to assess the visual amenity of a selection of industrial zones across the city highlighted variation in terms of landscape quality across zones and geographic areas. There are a number of possible reasons for this, but it is evident from the decisions on the majority of resource consents that the current rules are not achieving the landscape outcomes anticipated.
8. The conclusions from these investigations were that the rules are not effective across all zones and there is a dichotomy between the rules and outcomes sought, which the proposed plan needs to address.
9. Another amenity-related issue identified was the wording of Rule 5.2.7 (Landscape Areas), in Vol. 3, Part 3 of the operative District Plan, which specifies requirements for landscaping in industrial zones. It has been found to be confusing, difficult to interpret and the requirements themselves are not necessarily effective. For example, landscaping strips are required along all road frontages with an average width of 0.6m, which is not considered to be sufficient to enable the establishment of trees. Similarly, observations indicate the setback from adjoining residential and other sensitive zones is not sufficient to enable adequate screening with trees.
10. All of the above suggests that a complete rethink is needed on appropriate landscaping provisions, and related matters such as setbacks and building heights.

#### **GENERAL DIRECTION**

11. The policy direction in the Strategic Directions chapter is to ensure:
  - a. the health and safety of the district's residents and the amenity values they enjoy are protected or enhanced;
  - b. new activities and development do not create significant health, nuisance or other adverse effects for people or the environment; and
  - c. new development is integrated with, and within, existing urban areas, transport networks and other infrastructure.
12. At a strategic level, Policy 6.3.6 of the CRPS seeks to "recognise existing business zones provide for a range of business activities depending on ... the desired amenity" and that "good urban design principles should be incorporated where appropriate to the context".
13. In the context of industrial areas, the adopted direction is to mitigate adverse effects on people or the environment of industry through a combination of standards and design principles. Particular regard has been had to the functional and practical needs of businesses and targeting regulation to where it will be most effective in securing desired outcomes.

#### **SCALE AND SIGNIFICANCE**

14. The proposal includes enhancing visual amenity at the interface between industrial sites and the street, and with residential properties. It is not a radical change from the status quo in so far as the existing framework requires landscaping at these interfaces.
15. The direction being taken is one of simplifying the District Plan, enabling ease of use and reducing the number of consents. This reflects actions in the LURP to *support rebuilding*



*activities by reducing consenting requirements (Action 2).*

16. While the requirements for landscaping and siting of offices at the front of a site come at a cost to landowners and developers of industrial sites, the proposed policy approach is less stringent than the current framework for a number of zones, potentially reducing costs. It is therefore considered to be a reasonable approach that supports recovery while maintaining a level of amenity and minimising adverse effects on adjoining uses and the street.
17. The significance of the effects is minor as it affects a relatively small part of the city and the scale is site specific.

### 3. EVALUATION OF OBJECTIVES

Section 32(1)(a) of the RMA requires the Council to evaluate the extent to which the objectives are the most appropriate way to achieve the purpose (s 5) of the Act.

#### 3.1 EVALUATION OF PROPOSED OBJECTIVE 1

##### GENERAL DIRECTION OPTIONS AND RECOMMENDATIONS

- 1. Direct all industrial activities to existing industrial areas or new greenfield areas**
2. The Council has little options available in the way it meets future demand for industrial land. There is a directive policy in the LURP and Chapter 6 of the CRPS of directing industry to existing and new greenfield industrial areas.
3. Objective 6.2.1(3) of Chapter 6 states *“Avoid urban development outside of existing urban areas or greenfield priority areas for development.”* Policy 6.3.6(1) states that *“Business activities are to be provided for in a manner which (1) promotes the utilisation and redevelopment of existing business land...”*. These areas of existing business land are identified in the operative District Plan, and for greenfields business priority areas, in the CRPS. There is a large quantum of land already zoned or identified for business development. Making provision for industry in other locations would therefore be contrary to higher order document.
- 4. Alternative policy direction – direct specific industries to specific industrial areas (both existing industrial areas and new greenfield areas)**
5. An alternative policy approach would be to restrict the use of different industrial environments for different types of industry. With such an approach, land in the east (Woolston and Bromley) could be safeguarded for companies that discharge large volumes of wastewater. This in turn avoids pressure for wet industries to locate in areas where there are environmental constraints, i.e. aquifers, and/or infrastructure limitations. However, this outcome can be achieved by imposing appropriate restrictions on discharges of trade waste.
6. The policy direction is also one of ensuring industrial areas are for primarily industrial activities and to impose restrictions on offices and retail activities in these locations. This reflects the LURP and Chapter 6 as summarised earlier, which in a Christchurch City context are of particular relevance, given the effects of dispersed retail and office jobs and activity and the impact this can have on recovery and growth of the Central City and other suburban centres. Other broad options, e.g. a liberal approach, are not considered further, having regard to the strategic policy context and its relevance to Christchurch.

##### ADOPTED GENERAL POLICY DIRECTION

7. Having regard to earlier discussion of the issue and evaluation of objectives below, the overall policy direction is to direct new industrial activities to existing and new greenfield areas, therefore supporting the efficient use of infrastructure and land.

OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE RMA	
Objective	Summary of evaluation
<p><b>Objective 1 (Option 1)</b></p> <p>The recovery and economic growth of the district's industry are supported and strengthened in existing and new greenfield industrial zones.</p>	<p>Proposed Objective 1 seeks to address the resource management issues identified earlier, namely:</p> <ol style="list-style-type: none"> <li><b>1. Ensuring that the demand for land can be met to accommodate future industrial growth and to support the recovery</b> Through providing sufficient land, industrial development can be accommodated in existing and new industrial areas, demand can be met to enable growth and recovery. Recovery and long-term economic development depends on how competitive the region and district are and this will be driven partly by cost structures in the land market.</li> <li><b>2. The potential of non-industrial activities to restrict opportunities for industrial activities to operate</b> The industrial sector needs certainty its activities will not be limited by the presence of incompatible uses. This necessitates a restrictive approach to non-industrial uses in industrial zones, therefore minimising the potential for reverse sensitivity effects and other environmental impacts, for example, traffic and parking demand compromising the role of roads in industrial zones for freight movement).</li> <li><b>3. The potential traffic and employment implications resulting from a shift in industrial activity to the west of the City</b> Providing a range of locations for industry, including through the redevelopment of existing areas, makes more efficient use of existing infrastructure and assists in reducing long commutes for the workforce.</li> <li><b>4. Poor amenity levels in existing industrial areas and the potential for conflict at the interface with other zones or land uses</b> Through supporting industry in existing and new greenfield areas, and ensuring separation between industry and more sensitive land uses, the potential for conflict can be minimised.</li> </ol> <p>Option 1 (Proposed Objective 1) would (in the context of Part 2 matters):</p> <ol style="list-style-type: none"> <li>a. support industry and other business activities that provide employment opportunities, the income from which enables residents to provide for their social and economic well-being;</li> <li>b. enable employment opportunities in existing industrial zones that are accessible to the local labour force and promote walking and cycling and public transport usage;</li> <li>c. contribute to the well-being of communities by supporting recovery of the city's industry in a way that facilitates growth;</li> </ol>

	<ul style="list-style-type: none"> <li>d. enable industrial areas to be efficiently served by infrastructure, with cost efficiencies for both industrial land developers and the wider community;</li> <li>e. enable business growth and recovery in existing and new industrial areas that provide opportunities for agglomeration and efficiencies in the market place;</li> <li>f. limit the location of industry in other more sensitive areas that can have adverse effects on the amenity values of those areas and the quality of the surrounding environment;</li> <li>g. enable separation from more sensitive land use activities (e.g. residential) through the identification of specific areas for industrial activities, thereby limiting impacts on the health and safety of communities that may otherwise arise by their co-location;</li> <li>h. constrain opportunities for other business activities which may otherwise support the well-being of the surrounding residential community and local workforce, e.g. retail and services;</li> <li>i. constrain the opportunities for economic growth and employment in retail and office sectors in industrial areas, due to businesses locating in less favourable locations (from market perspective) or shifting elsewhere;</li> <li>j. impose additional costs on lawfully established retail and office-based activities, while also limiting the use of land, allowed for under the current planning framework;</li> <li>k. promote the sustainable management of the resource to meet the long-term needs of industry by (a) recognising the locational requirements of industrial activities (including proximity to strategic transport infrastructure including arterial routes); and (b) reducing the potential for these activities to be compromised by other activities (e.g. reverse sensitivity);</li> <li>l. safeguard the life-supporting capacity of air, water, soil and ecosystems by providing for the recovery and growth of industry in existing industrial areas and limited new greenfield business areas, thereby avoiding pressure for new business areas to be identified in rural areas;</li> <li>m. support the recovery and growth of the Central City and other commercial centres by ensuring <i>most</i> commercial activity is directed to centres, thereby promoting vital and viable community focal points and enhancing the ability of people and communities to provide for their social, economic and cultural well-being; and</li> <li>n. agglomeration of commercial activity in centres is promoted, which provides economic benefits to business through co-</li> </ul>
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	location of suppliers/other businesses providing services, e.g. copy services.
<p><b>Option 2 (Status quo – existing City Plan ‘Role of Industrial Areas’)</b></p> <p><i>A wide range of industrial areas which accommodate a diversity of appropriate business activities, where adverse effects are avoided, remedied or mitigated.</i></p>	<p>Option 2 would see the retention of the existing City Plan objective ‘Role of Industrial Areas’, which effectively provides for a wide range of business activities including commercial, subject to avoiding, remedying or mitigating adverse effects. It is noted that such an approach would not give effect to the key direction of the LURP and Chapter 6 of the CRPS, which both seek to limit non-industrial activities within industrial areas. Similarly, it could potentially exacerbate the issue of non-industrial activities potentially restricting opportunities for the establishment and operation of industrial activities (Resource Management Issue 2) and the potential conflict between industrial and non-industrial uses (Resource Management Issue 4).</p> <p>In achieving the purpose of the RMA<sup>6</sup> Option 2 could result in:</p> <ol style="list-style-type: none"> <li>a. improved access to employment, goods and services for residents in the immediately surrounding area and the potential to promote greater use of public transport, of benefit to people’s economic and social well-being;</li> <li>b. increased expectations by the public, workers and non-industrial activities for a higher level of amenity in these areas, reducing their attractiveness for industrial activities that may have adverse effects and that require separation from more sensitive activities;</li> <li>c. potentially affecting the growth and recovery of the Central City by <ol style="list-style-type: none"> <li>i. decentralising jobs, particularly office jobs;</li> <li>ii. undermining the public investment in infrastructure (including transport and amenities) and other physical resources as well as future spending, resulting in increased marginal costs for community infrastructure; and</li> <li>iii. eroding the role of centres as focal points and the appropriateness of areas surrounding centres for higher density housing;</li> </ol> </li> <li>d. greater reliance on private vehicles for communities to access services. This may result in reduced access for those with limited access to private vehicles, reduced pedestrian or cycle accessibility.</li> <li>e. could make industrial land less affordable, particularly for small business;</li> <li>f. a greater take-up of industrial zoned land for non-industrial purposes could lead to: <ul style="list-style-type: none"> <li>- reverse sensitivity constraints on the operation of industrial</li> </ul> </li> </ol>

<sup>6</sup> Resource Management Act, Part 2, Section 5.

	<p>activities (leading to inefficient use of resources including buildings and infrastructure and increased costs for industrial activities associated with minimising effects to a greater extent)</p> <p>g. uncertainty for industrial companies on the role of industrial zones and the uses that may locate adjacent to industry. This may affect a company's willingness to invest in their land or buildings, which limits the development potential;</p>
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<p><b>Option 3 (Conservative approach – only permit industrial activities in industrial zones)</b></p> <p>The district’s industrial areas support recovery and economic growth (by only providing for industrial activities to strengthen and support recovery of the Central City, District and Neighbourhood Centres).</p>	<p>1. Option 3 would see industrial areas identified and safeguarded for industrial purposes only, and in doing so responds to Resource Management Issue 2 (avoiding the potential of non-industrial activities to restrict opportunities for the operation of industrial activities). Such an approach would also be consistent with the intent of the LURP and Chapter 6 of the CRPS, which seek to ensure that new and existing industrial areas are utilised for that purpose rather than as a location for new commercial activities, and to support the recovery of the Central City and other commercial centres. This option most notably differs from Option 1 (Proposed Option 1) by avoiding <i>all</i> non-industrial activity in industrial zones, including uses such as trade suppliers and yard-based retail activities.</p> <p>In terms of its appropriateness in achieving the purpose of the RMA, Option 3 would:</p> <ul style="list-style-type: none"> <li>a. support the recovery of the city’s industrial sector contributing to the well-being of communities by promoting growth, industrial employment opportunities and investment in infrastructure;</li> <li>b. support industrial activities and the ability of businesses and communities to meet their economic needs by reducing the likelihood of reverse sensitivity and any additional compliance or mitigation costs on businesses to address reverse sensitivity issues;</li> <li>c. by identifying specific areas for industrial activities, enable separation from more sensitive land use activities (e.g. residential), therefore limiting impacts on the health and safety of communities that may otherwise arise with industrial activities in close proximity and avoiding pressure for higher amenity levels to be achieved in industrial areas (inefficient use of resources);</li> <li>d. ensure that land values in industrial areas remain affordable for industrial uses, particularly small business, thereby enabling businesses to operate more efficiently (economic welfare);</li> <li>e. reduce pressure for public transport and car parking improvements, which may be required in association with high trip generating activities such as commercial activities, thereby making more efficient use of existing resources;</li> <li>f. reduce employee accessibility to amenities including shops and services for local employees including cafes and lunch bars;</li> <li>g. significantly support the recovery and growth of the Central City and other commercial centres by ensuring all commercial activity is directed to centres, thereby promoting vital and viable community focal points and enhancing the ability of people and communities to provide for their social, economic</li> </ul>
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	<p>and cultural well-being;</p> <p>h. significantly restrict opportunities for some types of retail uses such as trade suppliers, yard-based retail and service stations that may otherwise have difficulty finding suitable locations to establish, may be appropriately located within industrial areas to support industrial uses or may have adverse effects on amenity values and the quality of the environment were these to be restricted to commercial centres; and</p> <p>i. impose additional costs on lawfully established retail and office-based activities while also limiting the use of land allowed for under the current planning framework.</p>
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**Overall assessment of the appropriateness of Objective 1**

2. Overall it is considered Option 1 presents the most appropriate means of achieving the sustainable management of natural and physical resources. Industrial land is a finite resource (RMA s 7(g)) in the district in terms of the overall quantum of available land (having regard to competing land use activities). The land resource benefits from separation from more sensitive land uses and access to infrastructure (including wastewater and transportation networks) and for the resource to be taken up by non-industrial uses will compromise the ability for industry to be accommodated and/or operate in environments with other more sensitive land uses.
3. Option 1 responds to these issues recognising that the industrial land resource should be efficiently managed in a way that ensures it is available to provide for the immediate recovery and economic well-being of people and communities and the future industrial growth demands of the district over the Plan period (s 7(b)).
4. Objective 1 sets the framework for ensuring that sufficient industrial land is available to meet projected needs by limiting non-industrial activities within industrial areas whilst recognising that some other (limited) activities may be appropriate to meet the economic, social and health and safety needs of people and communities (s 5). This includes providing for ancillary retail, retail and services needed to support the industrial workforce and commercial uses that may not easily locate elsewhere or in doing so would undermine other District Plan objectives (e.g. trade suppliers' and yard-based activities' potential to impact on the vitality and viability of commercial centres).
5. In promoting the purpose of the RMA it is appropriate to identify and support specific industrial areas and limit the scale and type of non-industrial activity in industrial zones (as enabled by Option 1) in order to:
  - a. ensure a sustainable supply of industrial land is available (reducing displacement of industrial activities to other areas) (s 5(2));
  - b. make most efficient use of existing resources (reducing reverse sensitivity and enabling industry to be efficiently served by infrastructure) (s 7(b)); and
  - c. maintain and enhance the quality of environment of other (non-industrial) areas (s 7(f)).
6. In contrast, the more liberal approach of Option 2 would provide for the establishment of a



wide range of non-industrial activities within industrial areas. Whilst this would have the benefit of supporting the social well-being of people and communities by providing services and employment in proximity to residential communities and for the local workforce (s 5), it has the effect of reducing the resource available for industrial activities and risks compromising the efficient use and development of natural and physical resources (s 7(b)). Moreover, there is substantive risk to the recovery of the Central City (and thereby meeting the social, economic and cultural needs of a large city-wide catchment population along with significant public investment in infrastructure) by maintaining the status quo position of permitting retail and office development in industrial areas (s 5, s 7(b), s 7(ba), s 7(c) and s 7(f)).

7. The more conservative Option 3 would give effect to the purpose and principles of the RMA in much the same way as Option 1 except that, by directing all non-industrial activity into other areas including commercial centres, it may give rise to unintended adverse effects on the amenity and quality of the environment (s 7(c) and s 7(f)) in these areas, and would place unreasonable constraints on some business activity (such as trade suppliers and yard-based activities) to find alternative appropriate locations, to the detriment of the economic well-being.

### 3.2 EVALUATION OF PROPOSED OBJECTIVE 2

#### GENERAL POLICY DIRECTION OPTIONS AND RECOMMENDATIONS

##### Policy direction – Manage and improve the amenity of existing industrial areas and greenfield areas

The policy direction proposed is intended to address two issues:

1. amenity levels in industrial zones not being maintained, particularly along road boundaries, resulting in poor environmental outcomes; and
2. potential for conflict due to the development of non-industrial activities locating in or close to industrial uses, without adequate separation.

The overall policy direction is informed by the Strategic Directions chapter, which seeks to ensure:

- a. the health and safety of the district’s residents, and the amenity values they enjoy, are protected or enhanced;
- b. new activities and development do not create significant health, nuisance or other adverse effects for people or the environment; and
- c. new development is integrated with, and within, existing urban areas, transport networks and other infrastructure.

At a strategic level, Policy 6.3.6 of the CRPS seeks to “recognise existing business zones provide for a range of business activities depending on ... the desired amenity” and that “good urban design principles should be incorporated where appropriate to the context”.

Options considered at a broad policy level are discussed below when alternatives to the proposed Objective are considered.

#### ADOPTED GENERAL POLICY DIRECTION

Having regard to the strategic context, there is a need to avoid adverse effects on people or the environment of industry and incorporate standards and design principles, e.g. location of offices at the front of a site, where appropriate while recognising the functional requirements of industry. This is proposed as the general policy direction, which Objective 2 reflects. Further evaluation including alternatives within the scope of this direction are considered further on the following pages.

#### OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE RMA

Objective	Summary of Evaluation
<p><b>Option 1 (Proposed Objective 2)</b>  <b>Managing effects</b></p> <p>a. Adverse effects of industrial activities and development on the environment are avoided, remedied or mitigated and the level of amenity anticipated in the adjoining zone is not adversely affected by industry.</p> <p>b. Industrial sites visible from the road have a higher level of visual</p>	<ol style="list-style-type: none"> <li>1. The intent of Proposed Objective 2 is to respond both to the existing and potential amenity and other effects identified in Resource Management Issue 4 above, along with the strategic directions provided principally by the LURP and CRPS.</li> <li>2. The key message in Chapter 6 is that business development is to give effect to the principles of good urban design and the Urban Design Protocol to the extent appropriate to context (location and function), recognising that existing business zones provide for a range of business activities depending on the desired amenity of the business areas and their surroundings (CRPS Policies 6.3.2 and 6.3.6). The CRPS recognises that this assists with</li> </ol>

<p>amenity, particularly the Industrial General Zone (North Belfast) and Industrial Heavy Zone (South West Hornby) that are in highly prominent locations and act as gateways to the City.</p> <p>c. The cultural values of Ngāi Tahu/ manawhenua are recognised, protected and enhanced through the use of indigenous species in landscaping and tree planting, a multivalued approach to stormwater management in greenfield areas, and the protection and enhancement of waahi tapu and waahi taonga including waipuna.</p>	<ol style="list-style-type: none"> <li>3. With regard to achieving the purpose (s 5) of the RMA and the related principles contained in ss 6, 7 and 8 of Part 2 of the Act, the proposed Objective would: <ol style="list-style-type: none"> <li>a. ensure that adverse effects are minimised and a higher level of visual amenity is achieved at the boundary with more sensitive environments, avoiding health and safety impacts and improving the quality of life for nearby residents;</li> <li>b. enhance visual amenity along the road boundary thereby contributing to a better quality public space on or adjoining the footpath, which may contribute to reduced crime or improved perception of safety and quality of life;</li> <li>c. promote amenity improvements that may contribute to business retention, attracting investment and providing a healthy working environment;</li> <li>d. require the costs of amenity improvements to be borne by business rather than the general community, particularly with respect to the areas that have an interface with the road and adjoining zones (notwithstanding that the standard of amenity anticipated should reflect the function of industrial areas); and</li> <li>e. limit the potential adverse effects of development thereby helping to sustain the life-supporting capacity of natural resources.</li> </ol> </li>   <li>4. The Objective also recognises highly prominent sites that are at gateways to the city at Belfast and the south west. In achieving the purpose of the Act, the proposed Objective would: <ol style="list-style-type: none"> <li>a. enhance visual amenity at strategically important locations, contributing to the maintenance and enhancement of amenity values and the environment (s 7); and</li> <li>b. limit the potential adverse effects of development (s 5(2)(c) on physical resources including the urban area at the fringe of the City.</li> </ol> </li>   <li>5. The Objective and its recognition of cultural values is consistent with the Act's purpose of providing for the cultural well-being of people and communities.</li> </ol>
<p><b>Option 2 (Status quo – existing City Plan 'Amenity and Effects of Industrial Areas')</b></p>	<p>Option 2 would maintain the operative District Plan Objective, 'Amenity and Effects of Industrial Areas'.</p>

<p>A standard of amenity in industrial areas recognising their location and function, whilst avoiding, remedying or mitigating the adverse effects resulting from activity and development in these areas.</p>	<ol style="list-style-type: none"> <li>1. With regard to achieving the purpose (s 5) of the RMA and the related principles contained in ss 6, 7 and 8 of Part 2 of the Act, the alternative Objective: Option 2 (Status Quo) would achieve the same outcomes described under (3) on the preceding page.</li> <li>2. However, it is considered that the wording of this Objective (i.e. “A standard of amenity in industrial areas recognising their location and function”) does not clearly articulate what is anticipated, providing uncertainty for businesses about the outcomes sought, and which has previously led to inconsistent outcomes between old and new industrial areas. The effects of industrial activities are not mitigated due to insufficient treatment of boundaries with the road and more sensitive zones.</li> <li>3. Additionally, the s 35 Report<sup>7</sup> identified that the current District Plan provisions relating to amenity in industrial areas were ineffective, noting however that this may have been attributable to limited development or redevelopment opportunities within industrial areas (a situation much changed as a result of the Canterbury Earthquakes).</li> </ol>
<p><b>Option 3 (Liberal approach of accepting a lower amenity in industrial areas)</b></p> <p>To provide for economic growth by enabling business to operate without restrictions and in a lower amenity environment that reflects the nature of activities.</p>	<ol style="list-style-type: none"> <li>1. Option 3 advocates a more liberal approach whereby the District Plan would not seek to control amenity levels in industrial areas. This laissez-faire option would support the strategic direction offered by the LURP to reduce consenting and notification requirements in support of economic growth and recovery, however it would fail to deliver the amenity outcomes sought by both it and the CRPS.</li> <li>2. In terms of achieving the purpose of the RMA, Option 3 would leave amenity to the market, which in some instances, would place a lower value on amenity, which: <ol style="list-style-type: none"> <li>a. reduces its attractiveness as a place to live near or visit and may result in people avoiding an area because they feel vulnerable. This in turn reduces their accessibility to housing, employment and services and reduces the level of connectivity between various parts of the district;</li> <li>b. is likely to affect an industrial area’s ability to retain some types of business wanting a high amenity environment to attract interest and investment, and provide a healthy working environment, and</li> </ol> </li> </ol>

<sup>7</sup> Response Planning Consultants Ltd (28 January 2011), “Evaluating the Effectiveness and Efficiency of the Christchurch City Plan: Project Report.

	<p>consequently could result in an area becoming an under-utilised eyesore. Ultimately, significant public investment may be required to improve the area;</p> <ul style="list-style-type: none"> <li>c. could generate significant adverse effects including visual amenity and environmental effects (e.g. pollution and noise) <i>upon adjoining more sensitive zones</i> resulting from inadequate separation, landscaping or other buffers, thereby impacting on the health and safety and quality of life of people and communities; and</li> <li>d. could, unless otherwise mitigated generate significant environmental effects <i>within industrial areas</i> (e.g. contamination) that could impact on the life-supporting capacity of natural resources including soils, water, aquifers and air quality or constrain its future use and the ability to provide for the reasonably foreseeable needs of future generations.</li> </ul> <p>However, such an approach may also:</p> <ul style="list-style-type: none"> <li>e. be more attractive to businesses that have adverse effects (e.g. odour, noise, traffic generation) and require separation from other activities;</li> <li>f. support greater utilisation of land by business to meet their needs, supporting economic growth and employment; and</li> <li>g. reduce costs for business of providing landscaping.</li> </ul>
<p><b>Option 4 (Conservative approach of requiring a higher standard of amenity in industrial areas to make them attractive places to work)</b></p> <p>Development occurs in a manner that contributes to a higher standard of amenity in industrial areas, with open space and landscaping supporting the 'garden city' theme, while limiting adverse effects on adjoining areas.</p>	<ul style="list-style-type: none"> <li>1. In contrast to Option 3 above, Option 4 seeks to enable a high standard of amenity in industrial areas and in doing so: <ul style="list-style-type: none"> <li>a. ensures that adverse effects are minimised and a higher level of visual amenity is achieved at the boundary with more sensitive environments, avoiding health and safety impacts and improving the quality of life for nearby residents;</li> <li>b. enhances visual amenity along the road boundary thereby contributing to a better quality public space on or adjoining the footpath, which may contribute to reduced crime or improved perception of safety and quality of life;</li> <li>c. contributes to an area's attractiveness, providing employment opportunities and promoting economic recovery and growth;</li> <li>d. requires the costs of amenity improvements to be borne by business rather than the general community, particularly with respect to areas that interface with the</li> </ul> </li> </ul>

	<p>road and adjoining zones (notwithstanding that the standard of amenity anticipated should reflect the function of industrial areas);</p> <p>e. limits locational opportunities for industrial businesses that seek a lower amenity environment as a result of the effects they generate, or that may cause some existing businesses to relocate to other areas, diminishing the returns from investment in the area including infrastructure and other improvements, e.g. streetscape; and</p> <p>f. limits the potential adverse effects of development thereby helping to sustain the life-supporting capacity of natural resources.</p>
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**Overall assessment of the appropriateness of Objectives**

1. Having assessed the above four options, it is concluded that Option 1 is the most appropriate alternative for achieving the purpose of the RMA. The effects of industrial activities on the surrounding environment need to be minimised to sustain natural and physical resources that can otherwise be compromised for future generations (s 5(2)(a) of the Act). The ability for people and communities to provide for their health and safety can also be compromised due to odour, noise and other environment effects.
2. Limiting the effects of industry and achieving improved visual amenity at the interface with more sensitive environments is therefore consistent with ss 5(2)(c), 7(c) and 7(f) of the Act, which state that particular regard must be had to the maintenance and enhancement of amenity values and the quality of the environment. Option 3 is not consistent with the purpose of the Act in that it does not avoid, remedy or mitigate effects.
3. Option 4 does not place sufficient emphasis on the needs of industry and could result in the inefficient use of resources and infrastructure.
4. Option 2 (Status quo), while being similar to Option 1 in terms of limiting adverse effects, does not clearly articulate the outcomes sought and this uncertainty has resulted in different outcomes across different areas.

**The recommended objective is therefore Option 1 for the above reasons.**

#### **4. EVALUATION OF PROPOSED POLICIES, RULES AND METHODS**

1. Section 32 (1)(b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonable practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, and summarising the reasons for deciding on the provisions.
2. The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must if practicable quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

#### 4.1 POLICY 1 ‘SUFFICIENT LAND SUPPLY’ AND SUPPORTING METHODS

1. As summarised under “Key Directions”, the LURP identifies greenfield priority areas, which in addition to existing industrial areas, provide capacity to accommodate future growth up to 2028. There is also a clear direction that development outside existing urban areas or greenfield priority areas is avoided. The consideration of the following alternatives is therefore discounted:
  - a. leaving it to the market to decide where development occurs; or
  - b. rezoning land as and when demand arises.

The alternative to the proposed policy is therefore on how supply is managed.

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p><b>Relevant objective:</b>  <b>Objective 1 ‘Recovery and Growth’</b>            The recovery and economic growth of the district’s industry are supported and strengthened in existing and new greenfield industrial zones.</p>	
Provision(s) most appropriate	Effectiveness and efficiency
<p><b>POLICY 1 – Option 1</b>  <b>Maintain a sufficient supply of industrial land</b></p> <p>Maintain a sufficient supply of industrial zoned land to meet future demand up to 2028, having regard to the requirements of different industries, and to avoid the need for industrial activities to locate in non-industrial zones.</p> <p><b>Method</b>            Rezone land to meet anticipated demand while also providing choice in location. This includes the rezoning of greenfield areas referred to in the chapter as</p> <ul style="list-style-type: none"> <li>- Industrial General zone (North Belfast)</li> <li>- Industrial General zone (Trents Road)</li> <li>- Industrial Heavy zone (South West Hornby)</li> </ul> <p>The other ‘subzones’ are zoned for industry in the City Plan.</p>	<p><b>Effectiveness</b></p> <ol style="list-style-type: none"> <li>1. The LURP seeks to ensure there is sufficient and suitable industrial land for the recovery through to 2028. Greenfield priority areas together with vacant industrial land in existing zones are described as being <i>“sufficient to meet future demand, as well as allowing for choice of location and market competition. The land will provide for:</i> <ul style="list-style-type: none"> <li>• <i>Ongoing industrial business relocations</i></li> <li>• <i>Anticipated industrial growth (including the growth of sectors involved in recovery</i></li> <li>• <i>A range of industrial activities spread over a wider geographic area.”</i></li> </ul> </li> <li>2. The draft policy is therefore to <u>maintain</u> a sufficient supply, Maintaining a sufficient supply of zoned land supports the recovery and economic growth of the district (Objective 1) by providing capacity to accommodate demand and enable efficient operation of the market.</li> <li>3. Ensuring a sufficient supply of land up to 2028 reflects the LURP identification of areas to meet demand until this date, and which constitutes a sufficient supply. This provides the market with certainty and confidence to make decisions, which can fuel growth.</li> </ol>



	<p>4. The need to have regard to the requirements of different industries in maintaining a sufficient supply recognises that an area may serve specific requirements, for instance, some businesses will need close proximity to freight routes, while others in a service role will need to locate close to suppliers and customers.</p> <p><b>Efficiency</b></p> <p><b>Benefits</b></p> <p>5. Enables efficient operation of the market, allowing for ‘churn’ i.e. business relocating from a site, that site subsequently becoming available for another business; and</p> <p>6. Provides greater choice in terms of location.</p> <p><b>Costs</b></p> <p>7. There is potential for an over-supply of land, which leads to inefficiencies including costs of providing infrastructure to service new areas that are not necessarily utilised.</p>
<b>Options less or not as appropriate to achieve the objectives and policies:</b>	
<p><b>POLICY 1 – Option 2</b></p> <p>Stage the release of land to align with demand.</p>	<p><b>Appropriateness</b></p> <p>1. Managing the supply of land to a level that aligns with demand could result in the efficient use of land and infrastructure. However, the staging of areas for development may constrain the market in terms of location or other requirements, and the release of land may not keep pace with demand in periods of significant growth. This has the potential to impede recovery and economic growth, which is not the most appropriate method in achieving Objective 1.</p>
<b>Risk of acting or not acting</b>	
<p>2. There remains uncertainty over the scale of damage to land and buildings in the industrial areas of Woolston and Bromley and the extent to which this affects the future use of this land. Unlike residential areas, there is not an equivalent ‘red zone’ for industrial land, nor technical categories to reflect the degree of damage. Failure to provide sufficient land is likely to lead to many firms relocating out of the city.</p>	

**4.2 POLICY 2 ‘ENABLE THE DEVELOPMENT OF INDUSTRIAL AREAS TO SUPPORT RECOVERY’ AND SUPPORTING METHODS**

1. The proposed policy and alternatives considered reflect direction in the LURP that the utilisation and redevelopment of existing business land is promoted, and to support industrial companies wishing to remain or rebuild in existing industrial areas in the east. An alternative to Policy 2 of enabling the redevelopment of damaged land in the east for non-industrial activities is therefore not considered.

<b>PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</b>	
<p><b>Relevant Objective:</b>  <b>Objective 1 ‘Recovery and Growth’</b>            The recovery and economic growth of the district’s industry are supported and strengthened in existing and new greenfield industrial zones.</p>	
<b>Provision(s) most appropriate</b>	<b>Effectiveness and efficiency</b>
<p><b>POLICY 2 – Option 1</b></p> <p>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.</p> <p><b>Methods</b></p> <ul style="list-style-type: none"> <li>- Permit development in existing industrial areas (i.e. without consenting costs).</li> <li>- Through engagement with stakeholders including landowners and industry, identify constraints to development and work with groups to overcome these.</li> </ul>	<p><b>Effectiveness</b></p> <ol style="list-style-type: none"> <li>1. The policy supports recovery and economic growth of the district’s industry (Objective 1) by encouraging the redevelopment of industrial zones for industrial activities rather than other activities. In doing so, it promotes the efficient use of land and urban consolidation, directing growth to existing industrial zones generally serviced by infrastructure.</li> <li>2. The proposed policy reflects the status quo, but recognises areas that sustained damage and lost industry and associated employment continue to have a role for industry.</li> </ol> <p><b>Efficiency</b></p> <p><b>Benefits</b></p> <ol style="list-style-type: none"> <li>a. Utilisation of existing resources including land and infrastructure is promoted.</li> <li>b. Employment opportunities are retained in the east.</li> <li>c. Jobs are accessible to the local labour force, supporting the well-being of people in that community.</li> <li>d. Contributes to the more efficient use of land, supporting consolidation within the existing urban area</li> </ol> <p><b>Costs</b></p> <ol style="list-style-type: none"> <li>e. Ongoing constraints may sterilise land that is no longer appropriate for industry.</li> </ol>
<b>Options less or not as appropriate to achieve the objectives and policies:</b>	
<p><b>POLICY 2 – Option 2 Status Quo ‘Distribution of Industrial Activity’</b></p> <p>Encourage the efficient use of the industrial land resource</p>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>1. The current policy in the City Plan supports Objective 1 of supporting economic growth in existing industrial areas by encouraging the redevelopment.</li> <li>2. The current policy pre-dates the earthquakes and therefore</li> </ol>

(thus reducing pressure for new industrial land to be zoned), principally by limiting the extent of non-industrial activity within such environments and encouraging redevelopment of sites where possible.

**Risk of acting or not acting**

1. It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s32(4)(b)).

### 4.3 POLICY 3 ‘RANGE OF INDUSTRIAL AREAS’ AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p><b>Relevant Objective:</b>  <b>Objective 1 ‘Recovery and Growth’</b>            The recovery and economic growth of the district’s industry are supported and strengthened in existing and new greenfield industrial zones.</p>	
Provision(s) most appropriate	Effectiveness and efficiency
<p><b>POLICY 3 – Option 1</b></p> <p>Recognise and provide for industrial zones with different functions that cater for a range of industrial activities depending on their needs and effects as follows:</p> <p>a. Industrial General Zone</p> <p>i. Recognise and provide for industrial 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.</p> <p>b. Industrial Heavy Zone</p> <p>i. Recognise and provide for industrial 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 land use activities.</p> <p>c. Industrial Park Zone</p> <p>i. Recognise and provide for industrial activities in the high technology sector and other industries in a high amenity environment dominated by open space and landscaping, and that generate higher volumes of traffic than other industries while having negligible effects in terms of noise, odour or the use and storage of hazardous substances.</p> <p><b>Methods:</b>            Zoning areas as Industrial General,</p>	<p><b>Effectiveness</b></p> <p>1. Recognising and providing for a range of industrial activities in different industrial zones supports the recovery and economic growth of those industries in existing and new greenfield industrial areas (Objective 1). The zoning of existing industrial and greenfield areas for industry supports the use and development of these areas, avoiding pressure for development elsewhere in the city.</p> <p><b>Efficiency</b></p> <p><b>Benefits</b></p> <p>a. Employment opportunities are supported in a range of industries, reflecting the different environments for industry.</p> <p>b. Setting a clear direction on the anticipated outcomes in industrial zones provides certainty, and enables decisions to be made with greater confidence.</p> <p>c. Providing different environments for industry that reflect the effects of activities and amenity level reduces the potential for conflict between industry and more sensitive land use activities.</p> <p>d. Recognition of the existing industrial areas and effects without significant change enables industry to continue operating, without restriction on current practices.</p> <p><b>Costs</b></p> <p>e. Consolidation of the number of different industrial areas provided through zoning reduces the diversity of outcomes for which the status quo provides.</p> <p>f. The outcomes sought in different areas may not reflect what the market anticipates for an area, and it may therefore not develop to the full extent possible.</p>

<p>Industrial Heavy and Industrial Park.</p> <p>Refer to section 5.0 for further evaluation of methods for zoning industrial areas.</p>	
<b>Options less or not as appropriate to achieve the objectives and policies:</b>	
<p><b>POLICY 3 – Option 2 (Status quo)</b></p> <p><b>Policy: ‘Role of Industrial Areas’</b></p> <p>A wide range of industrial areas to accommodate a diversity of appropriate business activities, where adverse effects are avoided, remedied or mitigated.</p>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>1. The existing policy in the City Plan in providing for “a wide range of industrial areas” supports the recovery and growth of the district’s industry (Objective 1).</li> <li>2. Provision is made for “a diversity of appropriate business activities”, which is broader than industrial activity and has the potential to erode industrial capacity or result in reverse sensitivity effects. The current policy is therefore not as appropriate as the proposed policy in achieving Objective 1.</li> </ol>
<b>Risk of acting or not acting</b>	
<p>It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s32(4)(b)).</p>	

#### 4.4 POLICY 4 ‘ACTIVITIES IN INDUSTRIAL ZONES’ AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p><b>Relevant Objective:</b>  <b>Objective 1 ‘Recovery and Growth’</b>            The recovery and economic growth of the district’s industry are supported and strengthened in existing and new greenfield industrial zones.</p>	
Provision(s) most appropriate	Effectiveness and efficiency
<p><b>POLICY 4 – Option 1</b>  <b>Activities in industrial zones</b></p> <p>a. Maintain and support the function of industrial zones while providing for limited non-industrial activities that:</p> <ul style="list-style-type: none"> <li>i. are ancillary in scale and on the same site as a permitted activity;</li> <li>ii. are not appropriate in more sensitive environments due to their potential noise, odour or other environmental effects;</li> <li>iii. comprise yard based or trade suppliers in the Industrial General Zone;</li> <li>iv. provide an emergency service which may generate adverse effects; or</li> <li>v. support the needs of workers and businesses in the zone for food and beverages, commercial services, and the care of children.</li> </ul> <p>b. Avoid any activity in industrial zones with the potential to hinder the establishment or ongoing operation of industrial activities.</p> <p>c. Avoid the use of industrial zones for nonindustrial activities that could adversely affect the strategic role of the</p>	<p><b>Effectiveness</b></p> <ul style="list-style-type: none"> <li>a. Policy 4 supports the growth and recovery of industry in industrial areas (Objective 1) by maintaining and supporting the function of industrial areas for industrial activities, and avoiding effects on industrial activity including reverse sensitivity.</li> <li>b. As summarised earlier, Objectives 6.2.6(1) and (2) of Chapter 6 seek to ensure industrial areas are primarily for industrial activities.</li> <li>c. Policy 6.3.6 (6) recognises that existing business zones provide for a range of business activities, also referred to in Section 4.3.2 of the LURP. The proposed policy supports this by providing for businesses that are considered appropriate in industrial areas, including yard-based retailing, activities serving other businesses (trade-based suppliers) and emergency service facilities.</li> <li>d. Research undertaken to inform the Industrial chapter also supports a restrictive approach to retail and office activity in industrial zones. Property Economics<sup>8</sup> states:           <p style="margin-left: 20px;"><i>“It is crucial that Christchurch City Council provide an environment that facilitates the development of commercial activity in centres (and primarily the CBD) as opposed to out of centre locations and industrial zones”.</i></p>           Its research and analysis of market changes (current and future) and the redistribution of activity provides the basis for recommendations that the development of commercial activity is limited to an ancillary function. This is to ensure that industrial zones are left for industrial uses, albeit acknowledging most industrial activities require a small proportion of their GFA for ‘office’ functions, and therefore it provides a level of commercial flexibility and practicality</li> </ul>

<sup>8</sup> Property Economics (November 2013 *Proposed Christchurch City District Plan Commercial and Industrial Chapters Economic Analysis, Christchurch City Council*”.

<p>Central City, District, and Neighbourhood Centres as focal points for commercial, community, residential, and other activities.</p> <p><b>Methods</b> Permitted activities including Industrial Activity, Warehousing and distribution, and High Technology Industrial Activity. Other activities are limited in scale or Restricted Discretionary/ Discretionary.</p> <p><b>Definitions</b></p> <p>Ancillary Office activity Ancillary Retail activity Commercial services Emergency service facilities High Technology Industrial Activity Industrial Activity Noise Sensitive Activities Noxious or offensive activities Office Parking Building Parking Lot Public Transport facility Second-hand goods outlet Service Industry Trade and Industry Training facility</p>	<p>without compromising industrial activity development.</p> <p>e. With regard to residential activity, Part B of the proposed policy seeks to avoid activities that could result in reverse sensitivity effects. This effectively precludes the establishment of residential activity, except where ancillary in scale to an industrial activity, supporting the growth of industry in industrial areas without restriction.</p> <p>f. With an Activity based format, there is a need to ensure the activities are clear in their meaning. Definitions are therefore required for a number of activities listed in Activity tables.</p> <p><b>Efficiency</b> <b>Benefits</b></p> <p>g. Industrial zones are used primarily for industrial activities, supporting employment opportunities in industrial sectors, and economic growth.</p> <p>h. Supports the efficient use of resources by avoiding the use of land for non-industrial activities, which is intended for industrial activities.</p> <p>i. Ensures capacity to meet future demand for industrial activities.</p> <p>j. Avoids dispersal of retail and office activities outside centres, which can impact on recovery, vitality and amenity of the Central City and suburban centres or on their function as focal points for commercial activity.</p> <p>k. Avoids inefficient use of resources that are otherwise used in travelling to retail and office activities in less accessible locations.</p> <p>l. Minimises effects from general traffic on the road network and the function of roads for the movement of freight.</p> <p>m. Avoids the potential for expectations of a higher amenity environment due to the presence of retail and office activities.</p> <p>n. Avoids reverse sensitivity effects of non-industrial activities on existing industrial activities, particularly in the Heavy Industrial Zone and in doing so, enables industry to operate efficiently without constraints on their operations.</p> <p>o. Provides for food and beverage outlets to serve the needs of workers and visitors in the area.</p> <p>p. Provides certainty for landowners, occupiers and investors on the future use of land and the role of industrial areas, reducing the risk of potential effects on existing industrial activities of unforeseen changes to land use in the surrounding area.</p> <p>q. Provides for emergency service facilities and other non-industrial activities that may be inappropriate in other</p>
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	<p>locations and that serve the community.</p> <p>r. Enables an assessment of uses that may be appropriate in industrial zones including pre-schools and commercial services e.g. copy centre.</p> <p><b>Costs</b></p> <p>s. Policy approach will result in additional costs for new commercial activities to locate in centres due to higher land values.</p> <p>t. Businesses that have relocated to industrial areas under the Order in Council have to relocate, resulting in additional costs to those businesses.</p> <p>u. Opportunities for economic growth and employment in industrial areas associated with non-industrial activities is limited due to constraints on the activities that can establish.</p> <p>v. A larger number of consents are required if there is pressure for non-industrial development in industrial zones.</p>
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**Options less or not as appropriate to achieve the objectives and policies:**

<p><b>POLICY 4 – Option 2 (Status quo)</b></p> <p>Retain existing policies.</p> <p><b>Range of Activities</b></p> <p>To provide for a wide range of business activities in industrial areas appropriate to the levels of effects provided for in these areas, and also having regard to any potential cumulative impacts on the continuing ability of:</p> <ul style="list-style-type: none"> <li>- the Central City and District Centres to provide for the community's social and economic well-being while maintaining and enhancing their level of amenity; and</li> <li>- the Central City and nine consolidation focal points to serve as effective centres around which to concentrate increased population densities.</li> </ul>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>1. The current policy in providing for a wide range of business activities supports the recovery and economic growth of the district's industry as well as other businesses. However, in providing for a wide range of business activities there is potential for reverse sensitivity effects on industry, effects on the take up of capacity otherwise intended for industry, or the inefficient use of land (for example, an industrial activity not being able to utilise land adjoining a more sensitive use). This could affect the recovery and growth of industrial zones for industry.</li> <li>2. Provision for a wide range of activities also does not provide clarity on the intended function of industrial areas, which creates uncertainty for landowners, occupiers and investors. This has the potential to impact on growth.</li> <li>3. This alternative approach would also conflict with other objectives and policies of statutory documents, which seek to limit non-industrial activities in industrial zones, to support their recovery and growth, and in the case of commercial activity, promote the recovery and ongoing vitality of the Central City and other commercial centres.</li> <li>4. The current policy supports recovery and growth of industry (Objective 1) by only providing for residential activity to the extent necessary for the operation of business activities. In</li> </ol>
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<p><b>Residential Activities</b></p> <p>To provide for residential activities in industrial areas, to the extent necessary for the continued operation of business activities within such areas, and consistent with achieving reasonable standards of amenity for those people living in a business environment.</p>	
<p><b>POLICY 4 – Option 3 (Restrictive)</b></p> <p>No provision for non-industrial activities in industrial areas.</p>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>1. Objective 1 would not be met by a policy that precluded all non-industrial activities in industrial areas. This would preclude ancillary commercial and small-scale retail activities (to meet the day-to-day needs of workers) and which positively contribute to the recovery and growth of industry.</li> <li>2. A restrictive approach would not support emergency service facilities, and other community facilities that may not be appropriate in other areas due to their potential effects and locational requirements, i.e. good access to the strategic and local road network, and in doing so may conflict with other District Plan objectives.</li> </ol>
<p><b>Risk of acting or not acting</b></p>	
<p>It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).</p>	

#### 4.5 POLICY 5 ‘OFFICE DEVELOPMENT’ AND SUPPORTING METHODS

1. The proposed policy and alternatives considered reflect the strategic direction provided by the LURP and the CRPS, which direct that industrial areas are used primarily for industrial purposes. The potential ‘status quo’ alternative to Policy 5 (Offices permitted within some industrial zones – currently B3, B4, B4T and B8) is therefore not considered.

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p><b>Relevant Objective:</b>  <b>Objective 1 ‘Recovery and Growth’</b>                      The recovery and economic growth of the district’s industry are supported and strengthened in existing and new greenfield industrial zones.</p>	
Provision(s) most appropriate	Effectiveness and efficiency
<p><b>POLICY 5 – Option 1</b>  <b>Office development</b></p> <p>Avoid office development in industrial areas other than where it is:</p> <ol style="list-style-type: none"> <li>ancillary to a permitted activity on the same site;</li> <li>located in the Industrial Park zone while supporting the function of the zone for primarily industrial activities seeking a park like environment.</li> </ol> <p><b>Methods</b></p> <p>Rule restricting office floorspace to an ancillary function in industrial zones (500m2 or 30% whichever is the lesser)</p> <p>Rule restricting office floorspace to 5,000 m2 in the Industrial park zones</p>	<p><b>Effectiveness</b></p> <ol style="list-style-type: none"> <li>The proposed policy and methods                             <ol style="list-style-type: none"> <li>Support Objective 1 of the Commercial chapter by not allowing for the development of large scale office activities in industrial zones, thereby supporting a distribution of office (and retail) activities in centres, particularly the Central City and KACs.</li> <li>are consistent with operative CRPS Objective 5.2.1, proposed CRPS Objective 6.2.5 and Policy 6.3.6.</li> </ol> </li> <li>Analysis of different thresholds has been undertaken to determine the appropriate threshold of ‘500 m2 or 30%, whichever is the lesser’. See Table A on page 51. Table B on page 52 considers the application of the proposed threshold in two industrial zones as an example of the number of businesses that would comply with the proposed rule.</li> <li>A threshold that limits office floorspace by a percentage and quantum of floorspace is considered to be effective in ensuring industrial areas are for primarily industrial activities. A limit on floorspace only could lead to office activity becoming the predominant activity e.g. 500 m2 of office floorspace with a lesser amount of industrial floorspace, while a % figure alone could lead to a significant quantum of office floorspace. While it may be incidental in nature to the primary activity on a site, for example, offices associated with Carter Holt Harvey in Table B, there is a risk that the office component generates significant effects.</li> </ol> <p>Large scale offices leads to a significant distribution of employees in areas less accessible by public transport, with limited retail activity. Offices in industrial zones could lead to demand for services/ other activities in a lower amenity environment, which leads to impacts on the function of commercial centres.</p> <p>There is also a greater potential for reverse sensitivity effects</p>

	<p>associated with large scale office development in industrial zones.</p> <p>Provision for a larger amount of office floorspace in the Industrial Park zone (up to 5,000 m<sup>2</sup> of stand-alone offices, in addition to ancillary office floorspace) is to acknowledge the nature of some industries such as Information Technology, which have a larger office component as well as secondary businesses that benefit from close proximity to industrial activity (agglomeration).</p> <p><b>Efficiency</b></p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>a. Ensures that industrial land is used for primarily industrial purposes.</li> <li>b. Encourages future large-scale office activity into centres, particularly the CBD, in support of their recovery and ongoing viability and vitality and where they are better supported by transport and other infrastructure.</li> <li>c. Does not prevent the Plan’s ability to provide for a range of commercial activities to meet the city’s business and employment needs.</li> </ul> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>d. Lost development potential value for landowners of sites where offices may have previously been a permitted activity.</li> <li>e. Less locational choice for prospective office developers and occupiers.</li> <li>f. Ongoing pressure for office development in industrial zones</li> </ul>
<p><b>Options less or not as appropriate to achieve the objectives and policies:</b></p>	
<p><b>POLICY 5 – Option 2 (Restrictive)</b> Office activity provided for but restricted to a lesser extent in industrial zones</p>	<p><b>Appropriateness</b></p> <ul style="list-style-type: none"> <li>1. The recovery and growth of industrial activities in industrial zones sought by Objective 1 would be assisted by this policy option by avoiding the competition between land uses and the potential displacement or compromised operation of industrial activities. Such an approach would also support the centre-based approach advocated by Objective 1 of the Commercial chapter and would support the strategic direction provided by the LURP and CRPS but to a lesser extent than Option 1.</li> </ul>
<p><b>Option 3 (Permissive)</b> Provide for ‘offices associated with/ ancillary to an industrial activity without restrictions in terms of floorspace/</p>	<p><b>Appropriateness</b></p> <ul style="list-style-type: none"> <li>1. This option would generally support Objective 1 of the Industrial chapter by limiting offices in industrial areas. However, it would potentially lead to large scale office activities in industrial zones, which could still compromise</li> </ul>

percentage of floor area.	
<b>Risk of acting or not acting</b>	
It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).	

**Table A. Number and proportion of industrial zoned sites with office floorspace that would comply with different thresholds for office floorspace (using examples from other District Plans)**

Offices in Industrial zones	No.	Total	% of sites
Less than 50% only	1816	2148	84%
<b>Option 1 Proposed rule 25% or 250 m2 whichever is the lesser (e.g. Hamilton proposed plan)</b>			
Less than/ equal to 25% <u>and</u> less than/ equal to 250m2	1016	2148	47%
<i>Variations</i>			
Less than or equal to 25% only	1268	2148	59%
Less than or equal to 250m2 only	1665	2148	78%
<b>Option 2 Auckland - General Business zone</b>			
Less than or equal to 500m2	1973	2148	92%
<i>Variation on Auckland</i>			
<b>Less than/ equal to 25% and less than/ equal to 500m2</b>	<b>1179</b>	<b>2148</b>	<b>55%</b>
<b>Option 3 Auckland - Light and heavy industrial zones</b>			
Less than or equal to 30%	1447	2148	67%
<i>Variations on Auckland</i>			
Less than/ equal to 30% and less than/ equal to 250m2	1143	2148	53%
Less than/ equal to 30% and less than/ equal to 300m2	1216	2148	57%
<b>Less than/ equal to 30% and less than/ equal to 500m2</b>	<b>1340</b>	<b>2148</b>	<b>62%</b>

The data above is based on property information held by Council from valuations.

**Table B. Example of two industrial zones and the office floorspace on each site as a proportion of the total floorspace**

The businesses listed with the exception of those highlighted in yellow would comply with the proposed thresholds of 500 m2 or 30% (whichever is the lesser).

**a. Glassworks Estate, off Shands Road, south of Main South Road, Hornby**

Occupant	Warehousing (sq m)	Office (sq m)	% of office to total
Placemakers	1,695	358	13.10
Palmerston Transport	5,200	340	6.14
Fisher and Paykel	3,552	439	11
NZ Safety	1,219	608	33.27
Carter Holt Harvey	20,864	1,318	5.94

Move Logistics	5,525	280	4.82
<b>Downers</b>	<b>671</b>	<b>1215</b>	<b>64.42</b>
Big Chill	1,688	155	8.41
Bridgestone	1,028	155	13.10
DHL supply chain	6,676	195	2.83

**b. South Park Industrial Estate, Baigent Way off Lunns Road, Middleton**

<b>Occupant</b>	<b>Warehousing (sq m)</b>	<b>Office (sq m)</b>	<b>% of office to total</b>
RCR Infrastructure	1,165	477	29.05
Owens Transport	9,357	675	6.73
Staples NZ	1,889	118	5.88
Acrow Scaffolding	960	195	16.88

Source: Goodman, 2014

#### 4.6 POLICY 6 ‘OFFICE PARKS’ AND SUPPORTING METHODS

2. The proposed policy and alternatives considered reflect the strategic direction provided by the LURP and the CRPS, which direct that industrial areas are used primarily for industrial purposes. The potential ‘status quo’ alternative to Policy 5 (i.e. no specific office park zone but offices permitted within some industrial zones – currently B3, B4, B4T and B8) is therefore not considered.

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p><b>Relevant Objective:</b>  <b>Objective 1 ‘Recovery and Growth’</b>            The recovery and economic growth of the district’s industry are supported and strengthened in existing and new greenfield industrial zones.</p>	
Provision(s) most appropriate	Effectiveness and efficiency
<p><b>POLICY 6 – Option 1</b>  <b>Office Parks</b>            Avoid the development of new office parks while recognising and enabling office activities in the existing office park areas in Addington (Hazeldean Business Park and Show Place) and Russley (Airport Business Park and Sir William Pickering Drive) in a manner that does not undermine the role of District and Neighbourhood centres as the focus for offices.</p> <p><b>Method</b>            16.5 of chapter Industrial Office zone</p>	<p><b>Effectiveness</b></p> <ol style="list-style-type: none"> <li>1. The proposed policy recognises a small number of legitimately established large-scale office activities which have located in less than optimal locations whilst providing very clear direction that the Council does not support new office parks in industrial zones.               <ol style="list-style-type: none"> <li>a. Contributes towards the recovery and growth of the district’s industry (Objective 1) by recognising the agglomerations of existing office activity, distinguishing these areas from other industrial environments and reducing potential for large-scale office development in industrial areas of the city, which may otherwise impact on the establishment and operation of industrial businesses.</li> <li>b. Supports Objective 1 of the Commercial chapter by not allowing for the development of new office parks, thereby supporting a distribution of office (and retail) activities in centres, particularly the Central City and KACs.</li> <li>c. Property Economics<sup>9</sup> advises that the existing office parks should be recognised in the Plan because they are a well-entrenched part of the city fabric while facilitating the development of commercial activity in centres (and primarily the CBD) as opposed to out-of-centre and industrial locations.</li> <li>d. Is consistent with operative CRPS Objective 5.2.1, proposed CRPS Objective 6.2.5 and Policy 6.3.6.</li> </ol> </li> </ol> <p><b>Efficiency</b></p> <p><b>Benefits</b></p> <ol style="list-style-type: none"> <li>e. Recognises and enables ongoing use and activity lawfully</li> </ol>

<sup>9</sup> Property Economics (Nov 2013), “Proposed Christchurch City District Plan Commercial and Industrial Chapters Economic Analysis, Christchurch City Council”.

	<p>established and therefore gives certainty for existing landowners, occupiers and investors on the future use of their land.</p> <ul style="list-style-type: none"> <li>f. Ensures that industrial land is used for primarily industrial purposes.</li> <li>g. No need for landowners to rely on existing use rights to retain their lawful status.</li> <li>h. Clear direction for prospective developers looking for office park zoning (e.g. “no more anticipated”).</li> <li>i. Encourages future large-scale office activity into centres, particularly the CBD, in support of their recovery and ongoing viability and vitality and where they are better supported by transport and other infrastructure.</li> <li>j. Does not prevent the Plan’s ability to provide for a range of commercial activities to meet the city’s business and employment needs.</li> </ul> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>k. Lost development potential value for landowners of sites where office park development may have previously been a permitted activity.</li> <li>l. Less locational choice for prospective office developers and occupiers.</li> <li>m. Sunk costs associated with existing office park developments (particularly in respect of overspill parking into residential streets and lost opportunities for CBD revitalisation and recovery.</li> <li>n. Ongoing pressure for growth and expansion of office and ancillary activities in proposed office park areas.</li> </ul>
<b>Options less or not as appropriate to achieve the objectives and policies:</b>	
<p><b>POLICY 6 – Option 2</b>  <b>Industrial zoning applied to existing office parks</b></p>	<p><b>Appropriateness</b></p> <ul style="list-style-type: none"> <li>2. The recovery and growth of industrial activities in industrial zones sought by Objective 1 would be assisted by this policy option by ensuring industrial areas are supported and strengthened. However it is questionable whether this approach would be reasonable with regard to the large-scale office parks that have legitimately established in industrial locations, that would no longer be permitted activities and that would therefore need to operate under existing use rights.</li> </ul>
<p><b>Option 3 (Permissive)</b>   Offices limited in industrial areas but commercial rezoning</p>	<p><b>Appropriateness</b></p> <ul style="list-style-type: none"> <li>2. Under this option, there would be no specific office park zone but the existing office parks would be given a specific commercial zoning (Commercial Core or Fringe or Local</li> </ul>

<p>of the three office parks.</p>	<p>3. This option would generally support Objective 1 of the Industrial chapter by limiting offices in industrial areas but could give rise to more intensive commercial and community use of the three specified areas, with potential for resultant reverse sensitivity impacts on adjoining industrial businesses. In addition, this option would not be appropriate in the context of the centre-based strategy sought by Objective 1 of the Commercial chapter.</p>
<p><b>Risk of acting or not acting</b></p>	
<p>1. It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).</p>	



#### 4.6 POLICY 7 'BROWNFIELD REDEVELOPMENT' AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p><b>Relevant Objective:</b>  <b>Objective 1 'Recovery and Growth'</b>            The recovery and economic growth of the district's industry are supported and strengthened in existing and new greenfield industrial zones.</p>	
Provision(s) most appropriate	Effectiveness and efficiency
<p><b>POLICY 7 – Option 1</b>  <b>Brownfield redevelopment</b></p> <p>To support the redevelopment of brownfield sites for residential or mixed use activities where:</p> <ol style="list-style-type: none"> <li>A reduction in industrial land supply will not affect the ability to meet the anticipated needs of industrial activities including those with specific locational requirements.</li> <li>The residential or mixed use development would not hinder the establishment or ongoing operation of surrounding industrial activities.</li> <li>The anticipated amenity values of the adjoining industrial zone are not compromised.</li> <li>The safety and efficiency of the current and future transport system is not significantly adversely affected.</li> <li>A high level of residential amenity can be achieved on the site.</li> <li>There is good walking and cycling access to public transport routes, commercial and community services, and open space.</li> <li>If necessary, contaminated land is remediated in accordance with national and regional standards.</li> <li>The redevelopment does not impact on the vitality and strategic role of commercial centres as the focal points for commercial and other activities, and the efficient and effective use of land and/or community and transport infrastructure investment in centres.</li> </ol> <p><b>Methods</b>            Residential activity and office/ retail activity not ancillary to a permitted activity</p>	<p><b>Effectiveness</b></p> <ol style="list-style-type: none"> <li>Policy enables redevelopment of brownfield sites for housing or mixed use, therefore contributing to objectives of housing choice and supply, while ensuring the more efficient use of industrial land that is otherwise not required for industrial activities.</li> <li>The objective of a sufficient supply (Objective 1(i)) of land will be achieved with criteria to manage release (ensuring there is no significant adverse effects on supply). However, the release of individual sites, on their own, is unlikely to have a significant effect on achieving the objective's intent.</li> </ol> <p><b>Efficiency</b></p> <p><b>Benefits</b></p> <ol style="list-style-type: none"> <li>Supports the efficient use of land by enabling the redevelopment of under-utilised sites.</li> <li>Provides opportunities for residential development in close proximity to work, encouraging shorter journeys and walking and cycling.</li> </ol> <p><b>Costs</b></p> <ol style="list-style-type: none"> <li>Potential costs for developers of a consenting process and requirements to be met in criteria.</li> <li>Industrial companies may perceive the development of brownfield sites as increasing the risk of reverse sensitivity effects (despite the criteria of industrial activities in the vicinity not being compromised) and new businesses may consider alternative sites.</li> </ol>

is Discretionary to enable an assessment on a case by case basis	
<b>Options less or not as appropriate to achieve the objectives and policies:</b>	
<p><b>POLICY 7 – Option 2</b></p> <p>Limit brownfield opportunities to suitable sites identified in the District Plan.</p>	<p><b>APPROPRIATENESS</b></p> <ol style="list-style-type: none"> <li>1. This option would support the intent of Objective 1 by maintaining the extent (supply) of industrial land, limiting redevelopment opportunities for non-industrial activities and thereby reducing the potential for reverse sensitivity and other issues that may compromise the recovery and growth of industrial areas (e.g. expectations of higher amenity and infrastructure provision).</li> <li>2. This approach is more onerous or restrictive than the proposed policy option, the latter providing greater opportunity to consider ‘windfall’ sites on an ad-hoc basis, whilst still having regard to the recovery and growth aspirations of Objective 1, and other Plan objectives such as provision of housing.</li> </ol>
<p><b>POLICY 7 – Option 3 (Permissive)</b></p> <p>Enable the redevelopment or use of brownfield sites (permissive).</p>	<p><b>APPROPRIATENESS</b></p> <ol style="list-style-type: none"> <li>1. A permissive approach of allowing the redevelopment of industrial brownfield sites for residential or mixed use (via permitted activity status) may, over time, compromise the ability to achieve Objective 1(i) of ensuring a sufficient supply of land, (v) protecting industrial activities from reverse sensitivity and greater expectations of a higher level of amenity from people moving into or working on a former brownfield site, adjacent to existing industrial land.</li> </ol>
<b>Risk of acting or not acting</b>	
<ol style="list-style-type: none"> <li>1. It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).</li> </ol>	

#### 4.7 POLICY 8 ‘IMPROVE VISUAL AMENITY’ AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p><b>Relevant objective(s):</b>  <b>Objective 2 ‘Amenity in Industrial Zones and the effects of Industrial Activities’</b>            a. Adverse effects of industrial activities and development on the environment are avoided, remedied or mitigated and the level of amenity anticipated in the adjoining zone is not adversely affected by industry.</p> <p>b. Industrial sites visible from the road have a higher level of visual amenity, particularly the Industrial General Zone (North Belfast) and Industrial Heavy Zone (South West Hornby) that are in highly prominent locations and act as gateways to the City.</p> <p>c. The cultural values of Ngāi Tahu/ manawhenua are recognised, protected and enhanced through the use of indigenous species in landscaping and tree planting, a multivalued approach to stormwater management in greenfield areas, and the protection and enhancement of waahi tapu and waahi taonga including waipuna.</p>	
Provision(s) most appropriate	Effectiveness and efficiency
<p><b>POLICY 8 – Option 1</b>  <b>Improve visual amenity</b></p> <p>a. Development shall enhance the visual amenity of industrial sites along street frontages through landscaping and tree planting, and the location of the office component of the industrial activity on the street frontage, while providing for passive surveillance of public space.</p> <p>b. To encourage the use of indigenous species, appropriate to the local environment, in landscaping and tree planting to recognise the cultural values of Ngāi Tahu/ manawhenua.</p> <p>c. Enhance the visual amenity at gateways to the city through well setbacks and landscaping in the Industrial Heavy Zone (South West Hornby) and also well designed buildings in the Industrial General Zone (North Belfast).</p> <p><b>Methods</b>            Rule requiring offices to be at the front of a site between buildings and the street e.g. P12, Rule 16.2.2.1. Provisions re. landscaping (16.2.3.6), fencing (e.g. 16.2.3.1(b)), and storage</p>	<p><b>Effectiveness</b></p> <p>The proposed policy approach of improvements to visual amenity along road frontages, and on visually prominent sites supports Objective 2 by achieving a high level of amenity along road boundaries (street scene).</p> <p>The policy approach and rules recognise that the interface with public space (and with adjoining zones) is the most important across all zones, supporting Objective 2.</p> <p>The approach is efficient and effective in only targeting more sensitive boundaries and supports a permissive approach where industrial properties adjoin one another. Removal of internal setbacks (between one industrial site and another) will reduce consenting/ compliance requirements.</p> <p>As outlined in Appendix 9.5 (p115), provision for offices at the front of a site can create a strong relationship with the street. By allowing for intrusion of offices into the 6 m road setback, office development at the front of a site is incentivised (provided for up to 1.5 m from road boundary).</p> <p>Proposed landscaping rules seek to simplify requirements by focussing on boundaries rather than general provisions for across the site (as per the current City Plan, which prescribes a minimum percentage). The boundaries where landscaping is important in mitigating effects, being the road boundary and boundary with a residential zone, are considered appropriate to have controls.</p>

<p>(e.g. 16.2.3.5) also seek to improve visual amenity on the road boundary</p> <p>Appendix 16.1 includes indigenous species in the list of trees and shrubs appropriate for planting.</p>	<p>As recommended in Appendix 9.5 (p116), the existing city plan rules can be simplified with removal of a requirement for a minimum percentage of the site to be landscaped. This will significantly reduce the number of resource consents required (at least 200 in the Business 4 and Business 5 zones).</p> <p><b>Efficiency</b></p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>a. Provides for environmental benefits by supporting improvements to visual amenity at the interface with the road environment and more sensitive zones.</li> <li>b. Contributes to the enhancement of city-wide amenity.</li> <li>c. Requirement for offices at the front of buildings facing the street across all zones and not allowing outdoor storage within setbacks provides for a higher level of visual amenity at the interface with public space and adjoining zones than would otherwise be the case.</li> <li>d. Tree planting and landscaping has wider environmental benefits beyond screening, e.g. carbon sink/mitigates noise, heat and dust/biodiversity.</li> <li>e. A new requirement for car parking to be to the side or rear of a building in the Industrial Park Zone will support improvements to the amenity of sites as viewed from the road (public realm).</li> <li>f. The proposed policy ensures that suitable amenity outcomes are achieved at key locations that are generally visible to a large number of people, i.e. along State Highway corridors.</li> <li>g. Policy approach will not prevent high levels of development or the utilisation of space for companies to establish and operate.</li> </ul> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>h. Requirements for landscaping and buildings to be setback or restricted in scale results in additional costs for developers or landowners.</li> <li>i. Requirements for offices to be at the front of the site may not 'fit' with the business model of a company, generating additional site development costs to meet functional requirements.</li> <li>j. Limitations on fencing at the boundary with a road boundary may compromise the security of a business and its resources by making areas more visible and accessible than is sought.</li> </ul>
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<b>Options less or not as appropriate to achieve the objectives and policies:</b>	
<p><b>Policy 8 – Option 2 (Status quo)</b></p> <p>To improve the visual amenity and street environment in industrial areas.</p> <p>Retain existing provisions including site coverage, plot ratio, landscaping and visual amenity rules.</p>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>1. As discussed earlier, the existing District Plan rules have not achieved improvements to amenity in existing industrial areas (Objective 2 seeking amenity improvements) and may therefore not be the most effective means of achieving Objective 2.</li> <li>2. The ability to achieve improvements at the interface with the road is limited by rules on the siting of car parking (in existing provisions). As described earlier, it is apparent from site visits that car parking dominates the road frontage, resulting in offices with less prominence than is intended. While the current rules for offices to locate on the frontage are generally achieved, the benefit of this in improving visual amenity from the street is being compromised.</li> <li>3. In addition, the existing policy and rules contribute to higher development costs and reduced land for development. If the current policy and rules are retained, it could lead to unnecessary consents, in conflict with the intention of both the LURP and proposed Industrial chapter Objective 1, which seeks to strengthen and support the recovery and economic growth of the district's industry.</li> </ol>
<p><b>Option 3 (Liberal)</b></p> <p>Reduced requirements for landscaping or setbacks in recognition of the functional requirements of industrial activities.</p>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>1. This option would not support either tenet of proposed Objective 2.</li> <li>2. Whilst this option would provide for economic growth by reducing development costs for business (landscaping and requirements for the siting of buildings), it may lead to poor environmental outcomes in terms of lower visual amenity (particularly from the street frontage) and adverse effects on adjoining zones (particularly visual amenity, outlook, noise, traffic and pollution effects).</li> </ol>
<b>Risk of acting or not acting</b>	
<ol style="list-style-type: none"> <li>3. It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).</li> </ol>	

#### 4.8 POLICY 9 ‘DEVELOPMENT IN GREENFIELD AREAS’ AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p><b>Relevant objective(s):</b>  <b>Objective 2 ‘Amenity in Industrial Zones and the effects of Industrial Activities’</b>            a. Adverse effects of industrial activities and development on the environment are avoided, remedied or mitigated and the level of amenity anticipated in the adjoining zone is not adversely affected by industry.</p> <p>b. Industrial sites visible from the road have a higher level of visual amenity, particularly the Industrial General Zone (North Belfast) and Industrial Heavy Zone (South West Hornby) that are in highly prominent locations and act as gateways to the City.</p> <p>c. The cultural values of Ngāi Tahu/ manawhenua are recognised, protected and enhanced through the use of indigenous species in landscaping and tree planting, a multivalued approach to stormwater management in greenfield areas, and the protection and enhancement of waahi tapu and waahi taonga including waipuna.</p>	
Provision(s) most appropriate	Effectiveness and efficiency
<p><b>POLICY 9 – Option 1</b>  <b>Development in greenfield areas</b>            a. To achieve environments in greenfield priority areas with larger setbacks and landscaping, reflecting their location at the interface with adjoining rural zones and in prominent locations, some of which act as gateways to the city.</p> <p>b. Manage the development of greenfield areas in a manner aligned with the delivery of infrastructure, including upgrades to networks, to avoid adverse effects on networks serving these areas.</p> <p><b>Methods</b>            Specific rules for areas on the fringe of the City (refer to 16.2.7 North Belfast, 16.2.9 Trents Road, and 16.3.5 SW Hornby) incl. provisions re. landscaping and infrastructure upgrades.</p> <p>Also refer to evaluation of specific rules in Section 6.0 of this document.</p>	<p><b>Effectiveness</b></p> <p>a. The option of a policy and rules for larger setbacks and landscaping in greenfield areas reflects their location on the edge of the city, adjacent to strategic corridors and therefore prominent. The policy approach supports Objective 2 of higher levels of visual amenity in what are highly prominent locations.</p> <p>b. The opportunity exists to achieve a higher level of amenity in greenfield areas, given the spatial extent of the area and the absence of buildings that otherwise constrain the ability for larger setbacks and landscaping. Further evaluation of rules specific to each greenfield area are provided later.</p> <p>c. The approach is efficient and effective in only targeting boundaries with public space, i.e. roads, and adjoining the rural environment.</p> <p><b>Efficiency</b>  <b>Benefits</b></p> <p>d. Provides for environmental benefits by supporting improvements to visual amenity at the interface with the road environment and more sensitive zones.</p> <p>e. Contributes to the enhancement of city-wide amenity.</p> <p>f. Setbacks and landscaping enhance the transition between rural and urban areas.</p> <p>g. Cultural values can be recognised through the use of indigenous species in planting and landscaping.</p>

	<p>h. Provides a higher amenity environment for business and employees.</p> <p><b>Costs</b></p> <p>i. Requirements for landscaping and buildings to be setback or restricted in scale results in additional costs for developers and landowners.</p>
<p><b>Options less or not as appropriate to achieve the objectives and policies:</b></p>	
<p><b>Option 2</b>  <b>Apply general provisions to greenfield areas</b></p>	<p>1. A policy framework to require the same level of amenity in greenfield areas as existing industrial zones would not recognise the importance of sites that are in highly prominent locations on the edge of the city (Objective 2). It could lead to adverse effects on visual amenity, as viewed from the road and adjoining rural zone.</p> <p>It would enable the efficient use of land and support industry (Objective 1). However, this would be to the detriment of the area where the industrial land is.</p>
<p><b>Option 3</b>  <b>Provide for a level of amenity in greenfield areas akin to residential areas</b></p>	<p><b>Appropriateness</b></p> <p>1. Providing for a greater level of amenity in greenfield areas, more akin to residential areas would result in the loss of a significant area of land from development. This may adversely impact on the economics of developing the balance area, and not provide for the efficient use of land. It may also not be attractive to industry wishing to establish in a lower amenity industrial environment due to their potential effects.</p>
<p><b>Risk of acting or not acting</b></p>	
<p>2. It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).</p>	

**4.9 POLICY 10 ‘MANAGING EFFECTS ON THE ENVIRONMENT’ AND SUPPORTING METHODS**

<b>PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u></b>	
<p><b>Relevant objective(s):</b>  <b>Objective 2 ‘Amenity in Industrial Zones and the effects of Industrial Activities’</b>            a. Adverse effects of industrial activities and development on the environment are avoided, remedied or mitigated and the level of amenity anticipated in the adjoining zone is not adversely affected by industry.             b. Industrial sites visible from the road have a higher level of visual amenity, particularly the Industrial General Zone (North Belfast) and Industrial Heavy Zone (South West Hornby) that are in highly prominent locations and act as gateways to the City.             c. The cultural values of Ngāi Tahu/ manawhenua are recognised, protected and enhanced through the use of indigenous species in landscaping and tree planting, a multivalued approach to stormwater management in greenfield areas, and the protection and enhancement of waahi tapu and waahi taonga including waipuna.</p>	
<b>Provision(s) most appropriate</b>	<b>Effectiveness and efficiency</b>
<p><b>POLICY 10 – Option 1</b>  <b>Managing effects on the environment</b>            a. The effects of development and activities in industrial zones, including visual, noise, glare and other effects, are avoided, remedied or mitigated through the location of uses, landscaping, acoustic treatment, and screening            b. The scale and form of buildings reflects the surrounding built form of industrial areas while minimising visual effects on more sensitive zones.            c. The use and storage of hazardous substances and quantity of wastewater discharged in areas over unconfined or semi-confined aquifers is restricted to minimise any risk of</p>	<p><b>Effectiveness</b></p> <ol style="list-style-type: none"> <li>1. The policy of limiting the scale and form of development at the interface with more sensitive zones supports Objective 2 of ensuring that the level of amenity anticipated in the adjoining zone is not compromised by industry.</li> <li>2. Refer to Appendix 9.5 for evaluation of existing provisions, alternative approach and rationale for such an approach.</li> <li>3. In terms of height and setback, the proposed rules provide a simplified approach while also recognising that there is not a noticeable difference in built form between some industrial zones e.g. B4 and B5 zones that adjoin one another (refer to Appendix 9.5).</li> <li>4. A standard height of 15 metres (reflecting the built form from observations) is proposed, reflecting the existing height limit in the Business 4 zone. This also reflects the height of buildings observed from site visits. In large greenfield areas where larger buildings are likely to locate (due to land available), there is a greater opportunity to achieve higher stud heights. Provision is therefore made for buildings up to 20 metres in height in the Industrial Heavy zone (South West Hornby).</li> <li>5. Setbacks from the road and adjoining residential zones are standardised to simplify the plan and ensure consistency in terms of outcomes. A larger setback is considered inappropriate as it could lead to the inefficient use of land in existing industrial areas that is under-utilised and potentially ‘forgotten’, while a smaller</li> </ol>



<p>contamination.</p> <p>d. The cultural values of Ngāi Tahu/manawhenua are recognised through the protection of waahi tapu and waahi taonga, including waipuna, from the adverse effects of development.</p> <p>e. Development is designed and laid out to promote a safe environment and reflects principles of Crime Prevention through Environmental Design (CPTED).</p> <p><b>Methods</b>  Built form standards for all zones incl.  Height  Setbacks  Recession planes  Outdoor storage of materials  Landscaping  Noise mitigation (Rule 16.2.9.2.8)</p>	<ol style="list-style-type: none"> <li>6. A 6 metre setback is more onerous in the existing Business 3/Business 3B zone (Inner suburban industrial zones) where a setback of 3 m applies (unless opposite residential in which case it is 6 m). However, the average lot size in these two zones is significantly less than other industrial zones. Sites within areas such as Sydenham (B3/ B3B zoning) are typically narrower in shape than other zones and car parking is generally at the front. Therefore a setback of 6 m is not likely to have a significant effect on future development.</li> <li>7. Provisions for recession planes and outdoor storage are consistent with the current City Plan and are effective in mitigating effects on visual amenity and adjoining residential zones while not imposing significant costs. It is therefore not considered necessary to amend these rules.</li> <li>8. The provisions for landscaping seek to make a distinction between the amenity anticipated in each of the three zones. In the Heavy Industrial zone, landscaping is only required on the road boundary and boundary with a residential zone. In the Industrial General zone, landscaping is required on the same boundaries but also in car parking areas at the front of a site, while in the Industrial Park zone, a requirement for a minimum percentage of the site to be landscaped also applies.</li> <li>9. As discussed earlier (refer to page 60), the provisions are simplified from the current City Plan and focus on where landscaping is required to either screen activity (Residential zone boundary) or contribute to visual amenity (road boundary). While the functional requirements of industry are recognised, landscaping on the road boundary is considered appropriate for a number of reasons – <ol style="list-style-type: none"> <li>a. Roads have a range of users e.g. Garlands Road used by those travelling to Sumner, and are therefore highly visible environments despite their role being for primarily industry. It is considered appropriate that what is seen from the road is at mitigated by tree planting.</li> <li>b. Notwithstanding industrial areas being of a lower amenity, they have a role in contributing to the image of Christchurch as a garden city.</li> <li>c. Planting can also have environmental benefits e.g. absorbing CO<sub>2</sub> emissions, while also breaking up the built form of what is otherwise a ‘concrete jungle’</li> <li>d. The planting requirements are not considered onerous and costs associated with such planting are not likely to be significant. When compared with existing provisions that</li> </ol> </li> </ol>
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require a minimum percentage of the site to be landscaped, the costs should be significantly less.

**Efficiency  
Benefits**

- a. The proposed regulatory approach provides for the social well-being of people and communities by minimising adverse effects on residential and other more sensitive zones used. e.g. parks, cemeteries and conservation areas.
- b. It gives greater recognition to the different levels of amenity sought in different industrial areas, with the requirement for a minimum percentage of a site to be landscaped limited to the Industrial Park Zone where a park-like setting is sought (reducing consents). In contrast, the Heavy Industrial Zone has no similar requirement in recognition of a lower level of amenity anticipated.
- c. Increased setbacks from residential and other sensitive zones reduces the potential adverse effects of industrial activities on adjoining properties and reduces potential for complaints (reverse sensitivity), which may otherwise constrain operations.
- d. Removal of a maximum plot ratio rule in the General Industrial and Industrial Park Zone, except on sites adjoining a residential zone, enables a greater level of development, which may contribute to economic growth and higher levels of employment.
- e. Policy recognition of Ngai Tahu/ manawhenua values, reflected in the list of trees/ shrubs that can be used to achieve landscaping requirements

**Costs**

- f. Provisions controlling the scale and form of development across the different zones are similar, if not the same (notwithstanding the types of activities e.g. noxious activities, non-industrial activities, and other rules e.g. noise, glare, hazardous substances) providing a clear distinction.
- g. Controls on the scale and form of development limits the potential for an industrial company to grow. Notwithstanding this, the existing built form of industrial areas visited is less than the rules enable.
- h. Rules prescribing a maximum limit on site coverage and minimum percentage of landscaping in the Industrial Park Zone limit the extent of the area that can be developed.
- i. Restrictions on the scale and form of development results in a lower yield for an industrial landowner or developer.

**Options less or not as appropriate to achieve the Objectives and policies:**

<p><b>POLICY 10 – Option 2 (Status quo)</b></p> <p>Status quo – retain existing provisions</p>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>1. The status quo option of retaining existing provisions will not support Objective 2 to the same extent as the proposed policy. The current rules are not effective across all areas, particularly in terms of screening or in terms of providing adequate separation from other activities, particularly along the interface with more sensitive zones.</li> </ol>
<p><b>POLICY 10 – Option 3 (Liberal)</b></p> <p>Provide for a greater scale or form of development across industrial areas</p>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>1. Whilst Option 3 would support economic growth by providing for a larger scale of development than was previously enabled, and would enable businesses to better utilise their existing sites, perhaps even obviate the need to relocate to larger sites, it would not support Objective 2 of limiting adverse effects that may arise if a larger scale and form of development is provided for at the interface with adjoining zones. Such an approach has the potential to result in greater adverse effects on adjoining properties and the environment and increase the likelihood of reverse sensitivity effects.</li> <li>2. Furthermore, the scale of development may not be appropriate in the context of the wider built form character, particularly if taller buildings are provided for and may therefore conflict with general urban design and form objectives contained elsewhere in the proposed Plan.</li> </ol>
<p><b>Risk of acting or not acting</b></p>	
<ol style="list-style-type: none"> <li>1. It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).</li> </ol>	

#### 4.10 POLICY 11 'MANAGING STORMWATER' AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p><b>Relevant objective(s):</b>  <b>Objective 2 'Amenity in Industrial Zones and the effects of Industrial Activities'</b>            a. Adverse effects of industrial activities and development on the environment are avoided, remedied or mitigated and the level of amenity anticipated in the adjoining zone is not adversely affected by industry.</p> <p>b. Industrial sites visible from the road have a higher level of visual amenity, particularly the Industrial General Zone (North Belfast) and Industrial Heavy Zone (South West Hornby) that are in highly prominent locations and act as gateways to the City.</p> <p>c. The cultural values of Ngāi Tahu/ manawhenua are recognised, protected and enhanced through the use of indigenous species in landscaping and tree planting, a multivalue approach to stormwater management in greenfield areas, and the protection and enhancement of waahi tapu and waahi taonga including waipuna.</p>	
Provision(s) most appropriate	Effectiveness and efficiency
<p><b>POLICY 11 – Option 1</b>  <b>Managing stormwater</b></p> <p>Ensure that stormwater is managed in a way that:</p> <p>a. supports a multivalue approach, using swales, wetlands, infiltration and retention basins having regard to the location and environmental constraints;</p> <p>b. is integrated within a wider network, reflecting a catchment based approach;</p> <p>c. limits the stormwater discharge to waterways through the use of retention facilities, storage tanks and/or rainwater harvesting, to reduce the risk of flooding;</p> <p>d. improves water quality;</p> <p>e. reduces the potential for birdstrike risk to aircraft</p> <p>f. utilises native species</p>	<p><b>Effectiveness</b></p> <ol style="list-style-type: none"> <li>1. The proposed policy supports Objective 2 in avoiding, remedying or mitigating the adverse effects of industrial activities. It also reflects broader objectives in the Strategic Directions chapter.</li> <li>2. The policy also gives effect to the Council's Surface Water Strategy 2009 –2039, to implement a multi-value approach to stormwater management, consistent with earlier strategies including the Natural Asset Management Strategy 1999 and Waterways and Wetlands Drainage Guide 2003. Prior to 1999, stormwater was only managed with one value in mind–drainage. A range of values are now considered including improvements to water quality, and improving the amenity of the area. A mechanism for achieving this includes swales and wetlands identified on ODPs for greenfield areas and subsequently implemented through the subdivision consenting process and development.</li> </ol> <p><b>Efficiency</b>  <b>Benefits</b></p> <ol style="list-style-type: none"> <li>a. Contributes to the enhancement of city-wide amenity.</li> <li>b. Enhances amenity and landscape values with the establishment of swales, retention and infiltration basins.</li> <li>c. Provides opportunities for recreation and open space.</li> <li>d. Cultural values can be recognised through the use of indigenous species in planting and landscaping.</li> </ol>

<p>within swales, basins and wetlands, where appropriate, recognising their ability to absorb water and filter waste.</p> <p><b>Methods</b> Resource consent required for any surface water management structure within 3km of the runways of Christchurch International Airport Limited</p> <p><b>Definitions</b> Bird strike Surface Water Management Structure</p>	<ul style="list-style-type: none"> <li>e. Avoids the risk of stormwater contaminating waterways and provides for higher standards of water quality.</li> <li>f. Reduces the risk of flooding on a catchment basis.</li> <li>g. Provides for efficiencies in managing stormwater across a catchment rather than individual site basis.</li> <li>h. Gives effect to resource consents the Council holds for stormwater management across the Styx and upper Heathcote catchments.</li> <li>i. A consistent approach is proposed to managing bird-strike risk in existing urban areas and greenfield areas that are in proximity to Christchurch International Airport Limited. A distance of 3km is proposed to recognise the greatest risk to aircraft is in close proximity to the airport, while enabling development beyond this that will otherwise require consent.</li> </ul> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>j. Costs of establishing the stormwater management system may be greater but over the long term, it provides for efficiencies, i.e. maintenance costs are less with a system involving swales or ponding areas.</li> <li>k. Some methods provide savings, e.g. rainwater harvesting.</li> <li>l. Larger area of land taken up for retention or infiltration basins relative to other options, which can reduce the potential area that can be developed.</li> </ul>
<b>Options less or not as appropriate to achieve the objectives and policies:</b>	
<p><b>Option 2</b> Provide for a range of solutions to stormwater management including piped infrastructure</p>	<p><b>Appropriateness</b></p> <ul style="list-style-type: none"> <li>1. The option of a range of solutions is broader than the first option in that it enables solutions that would be inconsistent with the Council's own strategies, i.e. piping of stormwater. While it supports Objective 2 of avoiding, remedying or mitigating adverse effects, it does not contribute to a higher level of amenity from public spaces.</li> </ul>
<p><b>Option 3</b> Status Quo – Retention of existing rules for greenfield areas to manage birdstrike risk from waterbodies</p>	<p><b>Appropriateness</b></p> <ul style="list-style-type: none"> <li>2. This option, while minimising birdstrike risk, does not enable the values of Ngai Tahu/ Manawhenua to be recognised and protected. The current rule does not enable interpretation to determine compliance.</li> </ul>
<b>Risk of ACTING OR NOT ACTING</b>	
<p>It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).</p>	

## 5.0 EVALUATION OF METHODS – ZONING

Zoning is a means of achieving Objective 1 and recognising the different functions of different industrial areas. It enables the management of areas where similar outcomes are sought in a coordinated and consistent manner.

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<b>Relevant Objective</b> Objective 1: Recovery and growth	
Provision(s) most appropriate	Effectiveness and efficiency
<b>Option 1.</b> <b>Introduce a new zone framework</b>	<b>Effectiveness</b>  <b>Efficiency</b> <b>Benefits</b> <ol style="list-style-type: none"> <li>1. <i>Environmental</i>            A new zone framework provides clarity on the outcomes sought for different industrial areas of the city and enables alignment between policy direction and methods to achieve outcomes sought. Fewer zones enables more effective and efficient monitoring and research on environmental conditions while still providing for some tailoring of rules to achieve desired outcomes for different industrial environments.</li> <li>2. <i>Social and cultural</i>            A reduction in the number and renaming of industrial zones supports people and communities by providing certainty about the intended function of different industrial areas and the uses anticipated. It also supports a tailored approach to managing effects, particularly at the interface between different zones.</li> <li>3. <i>Economic</i>            A reduction in the number of zones simplifies the Plan by avoiding a series of different policies and rules for areas where the same outcomes are sought, e.g. the outcomes sought for the Business 4T Zone, Business 4P and Business 7 Zones of a park-like setting with low density forms of development.</li> <li>4. In some areas, the rules may be more liberal as a result of consolidation, enabling a greater scale or form of development than the status quo.            Provided that the interfaces and main street frontages within industrial areas are well developed and landscaped from an amenity perspective, greater flexibility can and should be provided for development of the balance area.            This will facilitate a more efficient and effective use of the</li> </ol>

	<p>zoned land, and provide for a wide number of business activities.</p> <p><b>Costs</b></p> <p>5. <i>Environmental</i> The replacement of nine zones with three results in the consolidation of rules and other methods, which may have differed between zones. This may lead to similar outcomes across areas, reducing the diversity of environments and potentially not recognising the importance of rules specific to a stand-alone zone that provides a different level of amenity.</p> <p>6. <i>Social and cultural</i> A reduction in the number of zones and the consolidation of rules may result in different outcomes in some areas than what has been anticipated by the community.</p> <p>7. <i>Economic</i> The consolidation of zones and changes from the status quo results in a more restrictive approach than at present, e.g. areas zoned Business 3 in the City Plan that become part of the Heavy Industrial Zone, within which retail activities are restricted more so than at present. This will result in additional costs associated with consenting as well as compliance.</p>
<p><b>Options less or not as appropriate to achieve the objectives and policies:</b></p>	
<p><b>Option 2 (Status quo)</b> <b>Maintain Status quo – existing zone structure</b></p>	<p><b>Appropriateness</b></p> <p><b>Benefits</b></p> <p>1. <i>Environmental</i> The existing zone structure and provisions enable the effects of new development to be managed. The specific provisions for the existing nine industrial zones enables a tailored approach to different areas and to consolidate these zones may result in a loss of appropriate differentiation between zones. The current number of zones has primarily resulted from new zones being developed with area-specific rules appropriate to the environmental conditions of the local area. The area or zone-specific standards are intended to benefit the local environment.</p> <p>2. <i>Social and cultural</i> The existing framework enables people to provide for their social well-being by providing for a range of</p>

business activities including retail uses in industrial areas that serve the needs of those working and visiting the area, as well as those living in proximity. The existing provisions support employment opportunities, which support's people's well-being.

3. *Economic*

The existing framework enables the ongoing use of industrial areas for industrial and other business activities and identifies areas for new industrial development. This provides capacity to accommodate new businesses and the expansion of existing businesses within a market environment with relatively few restrictions, particularly on retail and office activity. This in turn provides employment opportunities for communities in the surrounding areas. The low level of restrictions within industrial zones may be an economic attractor to some investors, particularly those who have been displaced by the earthquakes.

**Costs**

4. *Environmental*

The current rules are not achieving all the outcomes anticipated in the City Plan. Amenity improvements within existing industrial zones and particularly at the interface between industrial zones and residential zones, is not being consistently achieved.

This has the potential to result in reverse sensitivity effects on existing businesses due to inadequate treatment of the interface. Sites have also not been efficiently and effectively developed, particularly in terms of required landscaping.

5. The encroachment of retail and office development within industrial areas can lead to reverse sensitivity issues as visitors could potentially be exposed to the effects of industrial activities including dust, noise and odour. The development of such activities could also under-utilise infrastructure designed for the area, such as roading (particularly freight networks), water, sewer and stormwater facilities. Conversely, it could put unplanned pressure on infrastructure such as public transport and on-street parking.

6. *Social and cultural*

The current framework does not provide for social and cultural values by enabling the establishment of retail activities in locations outside centres that are less



	<p>accessible by a range of modes and therefore not serving people's needs.</p> <p>7. <i>Economic</i> The existing policy framework does not give sufficient emphasis to the role of industrial areas as being for industrial activities, resulting in the encroachment of office and retail activities that can lead to reduced capacity and the displacement of demand to other locations.</p> <p>8. The existing zone framework results in a complexity of rules and site-specific exceptions, increasing administrative and compliance costs for the Council and public.</p>
<p><b>Option 3</b> <b>Single zone for all areas, providing for a range of business activities</b></p> <p>This option would zone all areas as one generic zone.</p> <p>Objectives and policies would reflect the existing City Plan, seeking a wide range of industrial areas, accommodating a diversity of activities, and where the amenity reflects the function of the area and effects are avoided, remedied or mitigated. However, a more restrictive approach to retail and office development would be introduced under this option to reflect draft Chapter 6 of the CRPS.</p>	<p><b>Appropriateness</b></p> <p><b>Benefits</b></p> <p>1. <i>Environmental</i> A single zone would enable consistent outcomes in new development across the city and provide certainty to businesses and the surrounding community over the outcomes anticipated.</p> <p>2. <i>Social and cultural</i> This option would support social and cultural well-being by providing for employment and business growth across the city with the potential for a diversity of businesses in all areas.</p> <p>3. <i>Economic</i> This option would result in a simplified approach and enable any user of the District Plan to refer to a single set of policies and rules, potentially reducing compliance costs.</p> <p><b>Costs</b></p> <p>4. <i>Environmental</i> A single zone across all industrial areas would imply that different industrial areas serve the same function or role, or that the effects, levels of amenity and other characteristics do not differ significantly across different areas. It would also not enable a tailored approach to different areas in recognition of their constraints, context and opportunities.</p>

	<p>5. <i>Social and cultural</i> This option of zoning all areas with similar provisions could lead to unintended outcomes on surrounding communities. Provisions to manage the interface between industrial and residential areas may be appropriate in one location but in another it may be unnecessary or insufficient due to the different functions of industrial areas.</p> <p>6. <i>Economic</i> This option would result in increased costs of consenting or compliance if activities appropriate in some industrial areas and not in others are not provided for. Likewise, activities may be provided for across all industrial areas but may not be appropriate in some locations, taking up the land resource that is better utilised for other activities.</p>
<b>Risk of acting or not acting</b>	
It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).	
<p><b>RECOMMENDED APPROACH:</b></p> <ol style="list-style-type: none"> <li>1. The proposed direction for the chapter is Option 3 of replacing the existing framework with a consolidated number of zones and objectives and policies setting the direction described above. This recognises that similar outcomes are sought across different zones while still enabling a tailored approach with several different zones achieving different outcomes. Option 3 also enables greater clarity on the function of different areas.</li> <li>2. While the option of reducing the number of zones may result in a more restrictive approach in some locations, the Council can consider the implications of changes through the process of review.</li> </ol>	

## 6.0 METHOD – SPECIAL PROVISIONS

1. The following evaluation considers specific provisions prepared for areas subject to an ODP and the appropriateness of these provisions.

### 6.1 GENERAL INDUSTRIAL ZONE (NORTH BELFAST)

#### Interface with Main North Road/Northern Arterial including the following:

- a. requirement for consent for any building within 30m of Main North Road and 50m of the Northern Arterial designation;
- b. setback from Northern Arterial Designation 15 m;
- c. setback from Main North Road 10m; and
- d. landscaping within setbacks.

Provision(s) most appropriate	Effectiveness and Efficiency
<p><b>Option 1</b> Provisions for setbacks, landscaping and requirement for consent to assess design and amenity of buildings adjoining Main North Road/Northern Arterial.</p>	<p><b>Effectiveness</b></p> <ol style="list-style-type: none"> <li>1. On the boundaries with Main North Road and the Northern Arterial, a setback of 10m and 15m is to maintain and enhance amenity adjacent to key corridors that currently serve as gateways to the city from the north.</li> <li>2. This supports Objective 2 of ensuring industrial sites visible from the road have a higher level of visual amenity, and are consistent with Policy 8, which recognises that greenfield areas such as North Belfast are in prominent locations, acting as a gateway for those arriving into the city from the south west.</li> </ol> <p><b>Efficiency</b></p> <p><b>Benefits</b></p> <ol style="list-style-type: none"> <li>a. Enhances the visual amenity at the interface with rural zones and at the gateway to the city.</li> <li>b. Maintains the character of the adjoining rural zones with a clear delineation between urban and rural development.</li> <li>c. Minimises the impacts of industrial buildings on outlook.</li> <li>d. Potential for increased investment.</li> </ol> <p><b>Costs</b></p> <ol style="list-style-type: none"> <li>e. Increased costs associated with land being set aside for setbacks and landscaping.</li> </ol>
<p><b>Options less or not as appropriate to achieve the objectives and policies:</b></p>	
<p><b>Option 2 Status quo</b> General set back of six metres</p>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>1. The general standard of a six metre setback would not contribute to visual amenity at a</li> </ol>

<b>Risk of acting or not acting</b>	
2. It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).	

**Resource consent for any development within the North Belfast area**

<b>Provision(s) most appropriate</b>	<b>Effectiveness and Efficiency</b>
<p><b>Option 1</b> All development subject to resource consent to enable an assessment of the potential effects on waahi tapu me waahi taonga (unless the non-compliance has previously been considered through the resource consent process).</p>	<p><b>Effectiveness</b></p> <ol style="list-style-type: none"> <li>1. The requirement for resource consent for any development within the North Belfast ODP area enables an assessment of potential effects on sites of significance to Ngai Tahu. This is consistent with Objective 3.6.3 (Tangata whenua) and Policy 3.6.3.2 (Protection of cultural heritage of significance to Ngai Tahu) of the Strategic Directions chapter.</li> <li>2. It also supports Objective 2 of the Industrial chapter in avoiding adverse effects on the environment of industrial activities.</li> </ol> <p><b>Efficiency</b></p> <p><b>Benefits</b></p> <ol style="list-style-type: none"> <li>a. Protects waahi tapu and preserves values for future generations.</li> <li>b. Provides an opportunity for input from Ngai Tahu in consideration of potential effects, therefore being consistent with policy direction in the Maahanui Iwi Management Plan.</li> </ol> <p><b>Costs</b></p> <ol style="list-style-type: none"> <li>c. Additional consenting and compliance costs unless dealt with through subdivision consent process.</li> <li>d. Does not enable development (i.e. development is not permitted).</li> </ol>
<b>Options less or not as appropriate to achieve the objectives and policies:</b>	
<p><b>Option 2 Status quo</b> No requirement for resource consent.</p>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>1. This option would enable development of the North Belfast industrial area without additional consents (unless addressed through the subdivision consent process). However, it could lead to the loss of waahi tapu me waahi taonga, thereby compromising Ngai</li> </ol>

<b>Risk of acting or not acting</b>	
2. It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).	

### Separation from Springs

<b>Provision(s) most appropriate</b>	<b>Effectiveness and efficiency</b>
<b>Option 1</b> Setback of 20m from springs	<p><b>Effectiveness</b></p> <ol style="list-style-type: none"> <li>1. A setback of 20m from springs will enable recognition and protection of the springs identified in the ODP, which are regarded as waahi tapu to Runanga and referenced in the Maahanui Iwi Management Plan<sup>10</sup>.</li> <li>2. The provision supports Objective 2 by avoiding adverse effects of industrial activities on the environment including waahi tapu. It is also consistent with objectives and policies in the Strategic Directions chapter including <i>“a strong enduring relationship between the Council and Ngai Tahu in the sustainable management of natural and physical resources that recognises -... the objectives and policies of the Maahuanui Iwi Management Plan”</i> and <i>“ensuring development retains and recognises values of historic and cultural significance to Ngai Tahu, and the relationship, culture and traditions of Ngai Tahu”</i>.</li> </ol> <p><b>Efficiency</b></p> <p><b>Benefits</b></p> <ol style="list-style-type: none"> <li>a. Recognises and protects Ngai Tahu/Manawhenua values, therefore supporting cultural well-being.</li> <li>b. Avoids potential effects on built form, i.e. instability.</li> <li>c. Opportunities to enhance amenity, recreational and landscape values.</li> </ol> <p><b>Costs</b></p> <ol style="list-style-type: none"> <li>d. Land set aside for protection of springs cannot be utilised for development, reducing financial return from the land.</li> <li>e. Setbacks may constrain use of the land in proximity to the springs, limiting the opportunities that would</li> </ol>

	otherwise arise.
<b>Options less or not as appropriate to achieve the objectives and policies:</b>	
<b>Option 2 Status quo</b> No setback requirement from springs.	<b>Appropriateness</b> <ol style="list-style-type: none"> <li>1. This option would not provide any recognition or protection of springs, potentially resulting in a loss of waahi tapu and therefore cultural values.</li> <li>2. This would be inconsistent with Objective 2 of the Industrial chapter and objectives and policies in the Strategic Directions chapter referenced above.</li> </ol>
<b>Risk of acting or not acting</b>	
There is not precise information on the location of springs. However, springs have been identified. For this reason, the proposed rule refers to any spring within the greenfield area rather than identification of their locations on the ODP.	

## 6.2 GENERAL INDUSTRIAL ZONE (TRENTS ROAD) AND (NORTH BELFAST)

### Interface with Residential Zone boundary including the following:

#### North Belfast

- a. setback from Residential Zone of 15m; and
- b. landscaping within setback.

#### Trents Road

- a. setback from Residential Zone of 25m for industrial activities; and
- b. landscaping within setback.

<b>Provision(s) most appropriate</b>	<b>Effectiveness and efficiency</b>
<b>Option 1</b> Introduce special setback requirement of 25m from Residential Zones for industrial activities.	<b>Effectiveness</b> <ol style="list-style-type: none"> <li>1. This option would support Objective 2, which seeks to ensure adverse effects of industrial activities on the environment are avoided and the level of amenity anticipated in the adjoining zone is not adversely affected by industry.</li> <li>2. Through consultation on the ODP for North Belfast and the ODP proposed rezoning of land at Trents Road, feedback from residents in the adjoining residential zone sought greater separation between industry and their properties to minimise visual effects, noise, dust and odour.</li> <li>3. As a greenfield area, there is greater opportunity to achieve separation between different land use activities than built up areas, and the ability to address issues of</li> </ol>

	<p>reverse sensitivity.</p> <p><b>Efficiency</b></p> <p><b>Benefits</b></p> <ol style="list-style-type: none"> <li>Maintains separation, reducing the potential effects on adjoining landowners.</li> <li>Provides for higher visual amenity at the interface with more sensitive zones, supporting people's social well-being.</li> <li>Avoids impacts of industrial scale buildings on the surrounding more sensitive environments.</li> <li>Enables recognition of the landscape values that exists pre-development in any setbacks.</li> </ol> <p><b>Costs</b></p> <ol style="list-style-type: none"> <li>Increased costs associated with land being set aside for setbacks or landscaping.</li> <li>It does not enable the land to be utilised efficiently by the landowner.</li> <li>Constrains the potential opportunities for development on the balance of any parcel adjoining the residential boundary, particularly smaller properties where a 15m setback will have a significant impact.</li> </ol>
<b>Options less or not as appropriate to achieve the objectives and policies:</b>	
<p><b>Option 2</b> <b>Status quo</b> Apply general setback of six metres</p>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>While a setback of six metres is proposed where an industrial zone adjoins a residential zone, it would not address the issue raised through consultation, nor be consistent with Objective 2 of avoiding adverse effects on the level of amenity anticipated in adjoining areas.</li> </ol>
<p><b>Option 3</b> Provide larger setback (20m +)</p>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>This option would provide a buffer between the proposed industrial and residential zone, providing adequate separation. However, it would result in the loss of a significant area of land for development, which may adversely impact on the economics of developing the balance area and not provide for the efficient use of land.</li> </ol>
<b>Risk of acting or not acting</b>	
<ol style="list-style-type: none"> <li>It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).</li> </ol>	

## 6.3 GENERAL INDUSTRIAL ZONE (SOUTH WEST HORNBY)/ SIR JAMES WATTIE DRIVE

### 1. Interface with rural boundary/Shands Road/Main South Road

Provision(s) most appropriate	Effectiveness and efficiency
<p><b>Option 1</b> Rule requiring a setback of 20m from the boundary with the Rural Zone (Marshs Road, Shands Road and Main South Road).</p>	<p><b>Effectiveness</b></p> <ol style="list-style-type: none"> <li>1. A setback of 20m with the adjoining Rural Zone will maintain and enhance the interface between rural and urban areas. On the boundaries with Main South Road and Shands Road, a setback of 12m is to maintain and enhance amenity adjacent to key corridors that currently serve as gateways to the city from the south west.</li> <li>2. This supports Objective 2 of ensuring industrial sites visible from the road have a higher level of visual amenity, and consistent with Policy 8, which recognises that greenfield areas such as South West Hornby are in prominent locations, acting as a gateway for those arriving into the city from the south west.</li> </ol> <p><b>Efficiency</b></p> <p><b>Benefits</b></p> <ol style="list-style-type: none"> <li>a. Enhances the visual amenity at the interface with rural zones and at the gateway to the city.</li> <li>b. Maintains the character of the adjoining rural zones with a clear delineation between urban and rural development.</li> <li>c. Minimises the impacts of industrial buildings on outlook.</li> <li>d. Potential for increased investment.</li> <li>e. Rural residential amenity maintained for adjoining landowners.</li> <li>f. Provision of cycle and walking route through landscaped area provides for recreation and therefore social well-being.</li> </ol> <p><b>Costs</b></p> <ol style="list-style-type: none"> <li>g. Increased costs associated with land being set aside for setbacks and landscaping.</li> </ol>
<p><b>Options less or not as appropriate to achieve the objectives and policies:</b></p>	
<p><b>Option 2</b> General provision applicable to Heavy Industrial Zone. Setback of</p>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>1. The general standard of a six metre setback would not contribute to visual amenity at a prominent location on the edge of the city and result in</li> </ol>



<p>six metres from road boundaries.</p>	<p>industrial buildings being in close proximity to boundaries with residential properties and the adjoining Rural Zone. It would therefore not support Objective 2 of ensuring a higher level of amenity at highly prominent locations.</p>
<p><b>Option 3</b></p> <p>Setback of 40m from the boundary with the Rural Zone (Marshs Road, Shands Road and Main South Road).</p>	<p><b>Appropriateness</b></p> <ol style="list-style-type: none"> <li>2. A setback of 40m (as applies to the land east of Shands Road, south of Sir James Wattie Drive, at the boundary with Marshs Road) would maintain and enhance visual amenity at the rural interface and as a gateway. However, this results in a significant area of land being set aside, which reduces the ability to use land efficiently while also having economic effects on the financial return from development.</li> <li>3. A designation for the second stage of the Southern Motorway also runs through a part of the Heavy Industrial Zone (Sir James Wattie Drive), which effectively alters the adjoining rural environment.</li> </ol>
<p><b>Risk of acting or not acting</b></p>	
<p>4. It is considered that sufficient information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).</p>	

**Interface with a residential property (Setback from Lot 1 DP 64487) within the General Industrial Zone (South West Hornby)**

Provision(s) most appropriate	Effectiveness and Efficiency
<p><b>Option 1</b></p> <p>Setback of 20m from the boundary of Lot 1 DP64487 within the Heavy Industrial Zone.</p>	<p><b>Effectiveness</b></p> <ol style="list-style-type: none"> <li>1. This option would support Objective 2, which seeks to ensure adverse effects of industrial activities on the environment are avoided. In this context, the option is to maintain residential amenity of a property used for residential purposes within the Heavy Industrial Zone (South West Hornby).</li> <li>2. Through consultation on the ODP/proposed rezoning of land between Main South Road and Shands Road, a resident at 187 Marshs Road (within area proposed for rezoning) sought greater separation between industry and their property to minimise visual effects, noise, dust and odour while they reside at the property.</li> <li>3. As a greenfield area, there is greater opportunity to achieve separation between different land use activities than built up areas, and the ability to address issues of reverse sensitivity, which a 50m setback would provide.</li> </ol> <p><b>Efficiency</b></p>

	<p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>a. Maintains separation, reducing the potential effects on the landowner.</li> <li>b. Provides for higher visual amenity at the interface with a more sensitive land use, supporting the social well-being of the residents of the property.</li> <li>c. Avoids impacts of industrial scale buildings on the residential property.</li> <li>d. Enables recognition of the landscape values that exists pre-development in any setbacks.</li> </ul> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>e. Increased costs associated with land being set aside for setbacks and landscaping.</li> <li>f. It does not enable the land to be utilised efficiently by the landowner who is required to provide the setback.</li> <li>g. Constrains the potential opportunities for development on the balance of any parcel adjoining the residential boundary, particularly smaller properties where a setback will have a significant impact.</li> </ul>
<b>Options less or not as appropriate to achieve the objectives and policies:</b>	
<p><b>Option 2 Status quo</b> Introduce setback requirement of six metres consistent with the setback requirement for a building in an industrial zone, adjoining a residential zone.</p>	<p><b>Appropriateness</b></p> <ul style="list-style-type: none"> <li>1. While a setback of six metres is proposed where an industrial zone adjoins a residential zone, it would not address the issue raised through consultation, nor be consistent with Objective 2 of avoiding adverse effects on the level of amenity anticipated in adjoining areas.</li> </ul>
<p><b>Option 3</b> Setback of 50m between industrial development and the boundary of Lot 1 DP 64487 (while the property is in residential use).</p>	<p><b>Appropriateness</b></p> <ul style="list-style-type: none"> <li>2. This option would provide a buffer between the proposed industrial and residential zone, providing adequate separation. It also reflects what has been sought and discussed with the landowner of the residential property affected. However, it would result in the loss of a significant area of land for development, which may adversely impact on the economics of developing the balance area and not provide for the efficient use of land.</li> </ul>
<b>Risk of acting or not acting</b>	
<ul style="list-style-type: none"> <li>3. It is considered that sufficient</li> </ul>	<ul style="list-style-type: none"> <li>information exists about the proposed provisions without the need to take account of the risk of acting or not acting (RMA s 32(4)(b)).</li> </ul>

## 7.0 SUMMARY OF CONSULTATION

### 7.1 SUMMARY OF PUBLIC FEEDBACK ON THE INDUSTRIAL CHAPTER AS REPORTED TO EARTHQUAKE RECOVERY COMMITTEE OF THE WHOLE

#### A: PUBLIC FEEDBACK RECEIVED VIA ONLINE SURVEY

Proposed Direction: **Limiting non-industrial activity (retail, offices and housing) in industrial areas.**

The proposed direction of limiting non-industrial activity in industrial areas was supported by the majority of respondents (59% of respondents in Proposed KAC Intensification Areas and 51% of general public respondents) (20% opposed).

<b>Main Reason cited for <u>supporting</u> proposed direction:</b>		<b>Additional comments (summary)</b>
<i>Proposed Key Activity Area Intensification Area Respondents</i>	Industrial activity has unique requirements that don't mix well with other activities.	Heavy industry needs to be kept separate.
<i>General Public Respondents</i>	Same as above	Heavy industry impacts on housing; encroaching retail areas impact on existing industries.
<b>Main Reason cited for <u>opposing</u> proposed direction:</b>		<b>Additional comments (summary)</b>
<i>Proposed Key Activity Area Intensification Area Respondents</i>	It is more convenient for workers and people living close by to have a mix of activities in industrial areas.	A local mix of activities can improve lifestyle and quality of life.
<i>General Public Respondents</i>	As above	Freedom of choice for business owners, consumers and developers to be able to locate throughout the district; strong and vibrant communities; lessen commuting.

**Industrial Business Landscaping** – An overwhelming majority of respondents (93%) **agreed** that landscaping should be used to reduce the visual impact of industrial businesses where they border residential and other sensitive areas to make the environment more pleasant.

**B: PUBLIC FEEDBACK RECEIVED VIA PUBLIC MEETINGS AND EMAILS**

The following is a summary as reported to Council. The actions do not necessarily reflect Council’s decisions.

Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
Specific Zones				
1. Industrial Park - Memorial Ave/ Russley Road	1.1 Concerns about Outline Development Plan provisions and built form standards including – <ul style="list-style-type: none"> <li>• stormwater provision</li> <li>• setbacks/buffers from road, residential, hotel</li> <li>• building heights</li> <li>• pedestrian linkages through site.</li> </ul>	11	<p>Provisions seek a higher amenity at the interface with roads, adjoining activities and residential properties within the zone through</p> <ul style="list-style-type: none"> <li>• height restrictions,</li> <li>• large setbacks from roads and sensitive uses e.g. residential,</li> <li>• active uses (e.g. ancillary offices/retail) facing the street</li> <li>• landscaping, and</li> <li>• assessment for buildings within 50 metres of Memorial Ave.</li> </ul> <p>Development needs to conform with the Outline Development Plan, including on-site stormwater facilities.</p> <p>Reduced height limit of 12 metres appropriate for any building within 50m of Memorial Ave rather than just those within the area identified for Guest Accommodation</p>	Rule amended to limit the height of buildings to 12 metres within 50 metres of Memorial Avenue, thereby ensuring a higher level of amenity and maintaining the vista through the gateway feature (arches) proposed on the Memorial Avenue / Russley Road overbridge.
	1.2 Concerns about design of development including gateway and visual impact.	7	<p>Visual amenity of the gateway site is maintained with a 20m building setback from Memorial Ave.</p> <p>As above, height limits of 12 m within 50 metres of Memorial Avenue and controls on design can also ensure a positive outcome. Extensive landscaping requirements and no car parking provision along the Memorial Ave</p>	As above

Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
			frontage also limits the potential for adverse effects.	
	1.3 Concern re. the loss of visual amenity from Avonhead and Russley Roads. Appearance sought is one of a park like environment with trees fronting to a 'rural lane', and 60 m setbacks with mounding along both frontages	1	A setback of 15 metres is proposed on the frontage with Avonhead Road and 10 metres on the Russley Road frontage, with landscaping required in these setbacks. In addition, an urban design assessment is required for any development within 50 metres of these roads to ensure buildings are well designed. This will minimise the potential visual effects of development	No change
	1.4 More specific landscape requirements need to be addressed on all boundaries	1	Landscaping rules (Rule 16.4.5.2.7 and Appendix 16.7.1) are specific and include minimum densities, heights for trees and requirement for landscaping to be maintained	No change
	1.5 Noise restriction is required (limited hours or limited access) to ensure amenity levels are protected	1	Restrictions on the hours of delivery are considered appropriate to minimise disturbance to residents in the surrounding area. However, as public roads, there is no ability to restrict the use of these roads to certain hours	Rule introduced to minimise the hours for deliveries as follows - <i>"No service deliveries shall occur on site between the hours of 10.00pm to 7.00am"</i>  <b>Refer to Rule 4.5.2.10, page 129</b>
	1.6 In principle concern about proposed uses including retail activity having regard to policy context (including effects on CBD Recovery), over supply of industrial land and loss of green belt. Suggested alternative uses.	9	Uses provided for are consistent with a higher amenity light industrial zone, suitable for areas adjacent to a residential environment. Consistent with RPS, LURP (priority site for industrial zoning) and CBD recovery. Rural uses not considered viable due to land fragmentation. Exception made for a maximum 200 bed hotel. The impact on the recovery of the CBD has been considered in a report and is unlikely to have significant effects.	No change

Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
	1.7 Concerns about infrastructure (sewer / water) constraints.	3	Alternative solutions for the site are considered viable.	No change
	1.8 Concerns about traffic congestion and on-street parking spilling into residential areas, pedestrian safety. Restrictions sought to avoid car parking outside proposed zone	3	Transport assessment indicates there is network capacity to accommodate future development on the site. Minimum parking requirements in place. High traffic generating uses will trigger consent and transport assessment.	No change
	1.9 Concern about the environmental effects of proposed uses e.g. Service Industry, incl. noise, odour, visual, traffic, water quality, and proximity of industrial uses to residential zones.	10	Rules in the proposed plan will address potential environmental effects of development on their surroundings. Separation by roads, large setbacks and landscaping requirements will mitigate visual and other impacts on residential areas in the vicinity.	No change
	1.10 Impact on airport operations	4	The height proposed is within the acceptable limits to avoid impacts on landing/ take off of aircraft	No change
	1.11 Impact on Commodore Hotel – amenity, outlook, noise, odour, visual impact. Seeks exclusion of service industry and any activities with potential significant amenity effects.	3	Amenity issues can be dealt with through setbacks, landscaping, and controls to retain sunlight/ outlook. Rules in the proposed plan will address potential environmental effects of development on their surroundings	No change
	1.12 Support proposed uses including industrial.	1	Noted	No change
	1.13 Opposes inclusion of Commodore land in industrial rezoning - suggests 'Residential Guest Accommodation' appropriate.	1	It is recognised that properties within the area proposed for rezoning are used for residential purposes and effects of development on these properties need to be addressed. These properties cannot be zoned residential	Rules propose setbacks and landscaping from these properties within the zone to minimise effects of development  <b>Refer to Rules 16.4.5.2.4(b) (Setback) and 16.4.5.2.7(c), pages 126 and 127</b>

Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
			as the site is in the airport noise contour line, nor remain rural due to the size of the lots.	
2. North West Review Area	2.1 Industrial use inappropriate. Inadequate servicing, transport, parking, water quality.	2	Options for the NWRA will be considered as a part of phase 2 of the DPR.	No change
	2.2 Suggestion to consider the use of NWRA Area 3 for Avonhead Cemetery extension.	1	Not part of this review. The zoning and uses to be considered in Phase 2 of the review.	No change
3. Industrial Park – Tait Campus	3.1 Seeks removal of proposed restrictions on office activity on the basis it is inconsistent with the Christchurch Central Recovery Plan and proposed Objective 1 of the chapter.  There should be no restrictions on the type of office activities or the percentage floor space they can occupy	1	It is recognised that there is a finer distinction between office and industrial activities in the high technology sector relative to other industries, and therefore provision should be made for offices that are not necessarily ancillary in nature. However, there is a need to ensure offices do not become the primary activity and that the function of the Industrial Park zone is retained, being for primarily industrial companies	Amendments proposed to Rule 16.4.4.1.1(Permitted Activity P10) <b>(Top of page 107)</b> to allow for offices up to 5,000 sq m (10% of the zone area) that are not associated with High Technology Industrial Activity. Any other office activity shall be limited to an ancillary role (no more than 500m <sup>2</sup> or 30% of the total floorspace on a site, whichever is the lesser).
	3.2 Seeks retention of current approach whereby ODPs are flexible and development must be 'in general accordance' with rather than directive 'must comply with'.	1	The issue with the current provision is that interpretations of what is in 'general accordance' with an ODP may differ and rules need to provide certainty and be clear.	No change
	3.3 Seeks controlled activity status for the erection of new buildings and additions to existing buildings rather than Restricted Discretionary	1	A change to the Activity status provides Council with the ability to approve or reject an application rather than being required to grant it with the scope limited to conditions in a consent.	No change
	3.4 Seeks various changes to the rules regarding car parking, food	1	The Plan change provisions have been reviewed and amendments sought in	Amendments to Built form standards in <b>16.4.4.1.1 (Starting on page 105)</b> to reflect

Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
	and beverage floorspace limits, access, shelter belts, trigger for provision of a footpath		comments are reflected in changes to the chapter.	plan change or to provide clarity regarding the timing of works
4. Industrial Park Zone – Wilmers Road	4.1 Seeks Industrial General Zoning. The zoning as Industrial Park is too restrictive (particularly regarding site coverage)	1	The maximum building coverage rule as amended in light of feedback is consistent with the Council led plan change for the land off Wilmers Road.	Specific provisions incorporated for the Industrial Park zone (Awatea) to reflect plan change <b>Refer to 16.4.6 for rules, beginning on page 131</b>
5. General Industrial Zone - Sydenham	5.1 Supports changes to building height and setbacks	1	Noted	No change
6. South West Hornby Industrial area (between Shands Road and Main South Road)	6.1 Light industrial should continue to be used as a buffer between residential and industrial uses	1	Agreed. The Industrial General Zone provides this buffer function.	No change
	6.2 Road identified on the ODP from the industrial area through residential area to Main South Road opposed	10	Potential impacts on residents of heavy traffic if road provided for to Main South Road through residential area. Further consideration to be given to alternative routes to Main South Road	Outline Development Plan ( <b>Appendix 16.7.8(i), p177</b> ) amended to not identify route of road from industrial area to Main South Road with note stating “ <i>Route of the Minor Arterial Road to Main South Road to be determined</i> ”
	6.3 Area with good soils, south of Heinz Watties land should be retained as open space	1	Land identified as Greenfield priority area in the Land Use Recovery Plan, and benefits from location close to proposed motorway and wider road network	No change
	6.4 Setback of 40 metres from Marshs Road and residential properties should be introduced (not 20 metres)	1	Setback of 40 metres considered but results in inefficient use land. A buffer of 20 metres is considered to be sufficient to provide a buffer between industry and rural lifestyle/ residential properties	No change
	6.5 Identification of stormwater facilities on the ODP is not necessary as retention/	1	Agree, the identification of stormwater facilities on the ODP does not reflect what is proposed within the greenfield area.	ODP ( <b>Appendix 16.7.8(ii), p177</b> ) and Rule 16.3.5.1.1 ( <b>page 88</b> ) amended to remove ‘stormwater facility’



Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
	infiltration basins are not proposed			
	6.6 Requirements for infrastructure works as a part of any development within the zone is onerous and would necessitate resource consent for any development within the zone	1	There is a need to assess proposals for new development that proceed roading improvements to avoid/ minimise adverse effects on the transport network	No change
	6.7 Requirement for traffic signals at the intersection of Shands Road and the 'northern spine road' (marked 'B' on the ODP) is not considered necessary to address traffic effects of the south western part of the greenfield area	1	Agree, the proposed rule requiring the construction of the intersection is not required to service the south western part of the greenfield area. It is understood the construction of the intersection will commence in the near future in conjunction with development of the northern part of the ODP area	<b>Rule 16.3.5.1.3 RD3 (page 91)</b> amended with deletion of requirement for construction of the intersection
	6.8 Setback of 50 metres from residential property within proposed industrial zone is inappropriate given the minimum building setback from adjoining residential properties is 20 metres	1	Agree, a 50 metre setback would consume a significant area within the site, resulting in the inefficient use of land. Having regard to the minimum building setback on other boundaries of 20 metres, this is considered to be sufficient to avoid adverse effects on the residential amenity of the property on Marshs Road	Amend <b>rule 16.3.5.2.3(b) (page 95)</b> minimum building setback from 50 m to 20m.
	6.9 Individual site access from Marshs Road should be allowed for	1	Restrictions on individual site access is to avoid multiple access points, which could compromise the function and efficiency of Marshs Road. Road access is enabled which seeks to consolidate access to individual properties internally within the zone. Restrictions to avoid individual site access also seeks to retain the function and	No change

Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
			character of Marshs Road, at the interface between rural and urban areas.	
	6.10 Requirement for a legal public access way through the landscaping strip is not appropriate as a future cycle route is likely to continue along the south side of Marshs Road, as a continuation of the proposed cycle route east of Shands Road	1	Agree, Marshs Road will provide a more direct route to Main South Road from Shands Road and continuity from a proposed cycle route on the south side of Marshs Road, east of Shands Road	<b>Rule 16.3.5.2.6 (page 96)</b> amended to remove references to accessways
7. Sir James Wattie Drive Industrial area (east of Shands Road)	7.1 Identification of stormwater basins and cycleways/ walkways on the ODP are not necessary	1	Stormwater basins are not proposed to manage stormwater and are not considered necessary. A cycling/walking route through the landscaped area on the ODP is not required as an accessway is proposed along the southern side of Marshs Road	ODP and <b>16.3.4.1.1 (page 80)</b> amended to remove references to stormwater basins and cycleways/walkways
	7.2 Requirement for upgrade of the intersection of Shands Road and Sir James Wattie Drive ahead of development is not necessary given the programmed works to occur at this intersection	1	It is not appropriate to remove rule given the works are yet to be completed and there is uncertainty on the timing of their completion. With further development having the potential to have adverse effects on the road network, retention of the current rule is considered appropriate	No change
	7.3 Requirement for a legal public access way through the landscaping strip is not appropriate as a future cycle route is proposed along the south side of Marshs Road	1	Agree	<b>Rule 16.3.5.2.5 (page 86)</b> amended to remove references to accessways
8. North Belfast	8.1 Support rezoning to General	1	Noted	No change

Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
Industrial Area	Industrial subject to amendments to ODP (access).			
	8.2 Seeks residential zoning of a southern part of the proposed industrial zone (adjoining existing residential) due to the (supported) setback and landscaping provisions of the zone limiting the potential use of their land for industrial redevelopment.	1	The land in question is in the LURP as a greenfield priority area for business and is considered appropriate for this use. While it is recognised that the setback and landscaping requirements are onerous and have a significant effect on the area that can be developed, they are intended to minimise effects on the adjoining residential properties. Shifting the zone boundary to the north would simply displace the issue onto another property.	No change
	8.3 The existing composting operation of Silver Fern Farms should be provided for in the proposed rules to recognise the rural use of land that may continue for the short to medium term	1	The existing rural activities within the proposed industrial zones have existing use rights and can continue as of right subject to the effects of the use being similar in terms of character, intensity, and scale	No change

Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
	<p>8.4 The springs identified on the ODP should be removed on the basis that the exact locations have not been accurately identified and other springs in the ODP area have not been included on the ODP.</p> <p>The setback of 30 metres from the springs should be amended to 20 metres to reflect the Iwi Management Plan</p>	1	<p>It is acknowledged that not all springs are identified and the existing springs may change over time with changes in land use and drainage patterns. It is therefore appropriate that the ODP in Appendix 16.7.5ii is amended to remove the springs. However, rule 16.2.7.2.4 is retained with amended wording to refer to 'any spring within the area'.</p> <p>Following review of the IMP and consideration of an appropriate distance to ensure protection of the springs, a 20 metre setback is proposed rather than 30 metres.</p>	<p>ODP in Appendix 16.7.5ii amended to remove spring locations Rule 16.2.7.2.4 (page 50) amended to remove reference to springs identified on the ODP. Also, the setback is amended from 30 m to 20 m.</p>
9. Woolston Heavy Industrial Area	<p>9.1 Extent of the Heavy Industrial Zone is inappropriate. Opportunities are sought for mixed use redevelopment of brownfield sites, with specific reference to the area bounded by Radley Street, Marshall Street, Cumnor Tce and the railway (incl. Maunsell St and Tanner Street). Seek rezoning to Industrial General zoning with modifications including an overlay to recognise existing uses and to provide for retail activities as per Variation 86. Alternative relief sought is for retail activities with maximum floorspace limits.</p>	2	<p>Site visits indicate that a number of sites are vacated (e.g. Skellerup) and without investment or opportunities, the area could remain underutilised. To support redevelopment and to provide for a mix of uses without compromising the ability for heavy industrial businesses to operate, an Industrial General zone is appropriate. The existing use of land in the area for retail activities e.g. the Tannery, are established and while an overlay could enable recognition of these uses, the area remains primarily industrial in nature.</p>	<p>Rezone area bounded by Radley St, Marshall St, Cumnor Terrace and the railway line from Heavy Industrial to General Industrial.</p>

Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
	9.2 Land at 94 – 96 Marshall Road specifically sought for rezoning to Industrial General	2		
	9.3 Support restrictions on non-industrial activities and separation of more sensitive land uses from industry by means of buffers	10	Noted	No change.
	9.4 Extend the Heavy Industrial zone to include residential properties, therefore providing a larger buffer between industry and non-industrial areas	1	Properties identified for rezoning are in residential use and this reflects the predominant use of those areas sought for rezoning. It is not considered appropriate to rezone the land in question for heavy industrial activity which could result in encroachment on more sensitive uses.	No change
10. Industrial General - 2 Waterman Place	10.1 Opposes Industrial General Zoning. Need to recognise existing commercial activities and Environment Court decision on variation 86. Seeks commercial rezoning or overlay.	1	Commercial rezoning not considered appropriate given the significant quantum of commercial development that this would enable at Ferrymead, to the detriment of the CBD's recovery.	No change.
11. Cookie Time, Templeton	11.1 Queries zoning of 698 Main South Road – existing zoning inappropriate in context.	1	Agreed.	Industrial rezoning proposed.
	11.2 Concern regarding road access close to residential properties + traffic	8	Changes to road access will separate inward and outward movements from the site, rather than use of single access that currently adjoins residential property,  It has been agreed with the applicant that the southern most access point is shifted to the south, so it is at least 25 metres from the southernmost residential property	ODP in Appendix 16.7.6 amended to show new location of southern road access to zone

Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
	11.3 Sufficient separation sought from residential properties	6	<p>A number of rules are proposed to address potential effects of industry on adjoining residential properties including</p> <ul style="list-style-type: none"> <li>- setbacks</li> <li>- acoustic fencing</li> <li>- assessment of the design of any building greater than 500 sq m or with long frontage.</li> </ul> <p>A setback of 25 m for industrial buildings is still considered appropriate. However, uses including a gymnasium, commercial services and ancillary retail and offices are anticipated to have lesser effects and a reduced setback of 10 metres is more appropriate.</p>	<p>Changes proposed to setback rule to allow for ancillary retail and offices, gymnasium and commercial services up to 10 metres from the residential boundary, while maintaining separation between industrial buildings and residential properties of 25 metres</p> <p><b>Rule 16.2.9.2.4, page 66</b></p>
	11.4 Concern over the scale of proposed industrial buildings	1	Height limits and recession plane requirements are intended to minimise effects on adjoining residential properties	No change
	11.5 Business needs to expand, preferably here, or would consider relocating to Auckland.	1	Noted.	No change.
	11.6 Need to ensure expansion is for Cookie Time use, not wider industrial use / on-selling or leasing to others.	1	The rezoning and provisions cannot limit ownership or the use of land to a specific business	No change
	11.7 Non-industrial uses including gymnasiums and commercial services are considered appropriate uses to serve the needs of businesses and workers	1	Given the light industrial nature of activities in the proposed Industrial General Zone, provision for commercial services and gymnasium may be appropriate to serve the needs of businesses and workers respectively. However, it is appropriate that an assessment is made of each proposal to ensure it does not undermine the function of the zone for industrial uses.	<b>Refer to Permitted activity Table (Rule 16.2.9.1.3, page 63)</b>

Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
	11.8 Setback of 25 metres from residential properties is not appropriate and the effects can be minimised through other methods	1	Agree, the use of the land within 25 metres for ancillary retail and office activities, gymnasium and commercial services is appropriate and a reduced setback should apply to these uses (10 metres), while retaining a larger setback (25 metres) for industrial uses	Amendments to <b>Rule 16.2.9.2.4 (page 66)</b>
12. Industrial General - Waterloo Business Park	12.1 Oppose restrictions on office floorspace in the context of Chapter 6 which provides for brownfield redevelopment). An overlay should be introduced to recognise the site as a brownfield area. In addition, office activities should be permitted without restriction or in the alternative, ancillary offices be limited to 50% of the overall floorspace rather than 250 m2 with the activity status for stand-alone offices and retail being discretionary rather than non-complying.	1	Chapter 6 of the RPS, forming part of the LURP sets a clear direction that industrial areas are for primarily industrial activities, with commercial uses restricted. To allow for offices without restrictions as currently provided for, would be inconsistent with the LURP. Objectives to support the recovery and growth of centres, particularly the Central City and Key Activity Centres would be compromised by a permissive approach to offices in the zone. Furthermore, 80 ha of the land rezoned was previously zoned Rural and is therefore not considered to be a brownfield site which the submission relies on.	No change
	12.2 Restrictions on showrooms and the display of goods as an activity standard for industrial activity overlaps with restrictions on ancillary retail activities	1	The definition of retail activity relates to the display of goods for sale. The standard is seeking to limit the display of goods/showroom, which is not necessarily intended for the sale or hire of goods on-site	No change
	12.3 Restrictions on the hours of operation for food and beverage	1	Food and beverage outlets include restaurants and the restriction on hours of	No change

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	outlets are considered unnecessary given the 24 hour nature of business activities		operation is to avoid the establishment of restaurants, which otherwise become a destination	
	12.4 Commercial services, day care and gymnasium are considered a necessary component in serving a large business park	1	Given the large quantum of employment anticipated and light industrial nature of activities in the proposed Industrial General Zone, provision for commercial services, day care and gymnasiums may be appropriate to serve the needs of workers and businesses. However, there is a need to assess proposals for these uses to avoid eroding the function of the zone.	Amendments to Activity tables for the Industrial General zone ( <b>Permitted Activity Table 16.2.4.1.3, page 20</b> )
	12.5 Ancillary office activity should not be restricted to an ancillary role to industrial activity i.e. offices ancillary to any permitted activity should be permitted	1	Agree. It is recognised that other non-industrial activities which are permitted e.g. Trade suppliers in the Industrial General zone may have an office component and this should be provided for	Definition amended to allow for offices ancillary to any <u>permitted</u> activity, rather than <u>industrial</u> activity. Activity Tables throughout chapter amended to refer to 'Ancillary Office activity'
	12.6 The standard requiring ancillary offices at ground floor level is not appropriate as offices are often at first floor/ mezzanine level	1	Agree, provision should be made for offices above ground floor while still requiring a location at the front of buildings facing the street to enhance the visual amenity of an industrial site	Activity specific standard requiring offices to be at ground floor is removed throughout the chapter
	12.7 Applications for consent for new buildings or additions to buildings adjoining Pound Road should not be notified with a clause to this effect	1	Agree. The design elements of a proposal do not necessitate notification to other parties and a clause is appropriate	<b>Rule 16.2.4.1.3, RD4 (Page 19)</b> amended to state " <i>Any application arising from non-compliance with this rule will not require written approvals and shall not be publicly or limited notified</i> ".
	12.8 Requirement for a setback or recession plane at the boundary with the adjoining rural zone to the north is not appropriate, particularly given	1	Agree that the recession plane requirement should not apply to industrial sites adjoining the rural zone.	Amendments applied throughout plan to remove recession plane requirement where a site adjoins a Rural zone



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	the nature of the adjoining rural environment			
	12.9 Provision clarifying the relevant group that applies for the purpose of rules on hazardous substances should be an advice note	1	It is not considered necessary for rules to be included with reference to other chapters that will be subject to review in phase 2. In effect the City Plan rules continue to apply and the existing zoning in the City Plan applies for the purpose of interpreting these rules	Remove rules specifying the relevant group that the zone fits into for the purpose of interpreting rules on hazardous substances, glare and noise.
	12.10 The existing rule in the Operative plan, which seeks to minimise birdstrike risk associated with the creation of waterbodies should be retained	1	The current rule in the City Plan, which applies to other greenfield areas, prescribing standards for waterbodies does not enable someone to determine compliance without technical advice and an understanding of how a waterbody can be designed to avoid attracting bird species.	No change
13. Wigram Industrial area (off Haytons Road)	13.1 Object to requirement for consent for any development within the Wigram industrial zone given subdivision consent approval for the zone	1	Accept that subdivision has been approved and is well advanced to the extent that an integrated approach is being achieved	Rule deleted
14. Land between Moorhouse Ave and railway line, from Colombo to Waltham	14.1 The proposed industrial zoning is opposed on the basis that the existing environment developed in accordance with expectations for the zone incl. commercial activities (office and retail). A commercial zoning/ overlay should be applied	1	Having regard to the current uses and proposed uses, the land is not likely to be developed in a way that reflects the outcomes sought for an industrial zone. The area sought for rezoning (5 ha) is reasonably large and there is a need to avoid impacts on the Central City. Having regard to potential effects while recognising the existing land uses, a Commercial Retail Park zone is considered the most appropriate to provide for large format retail activities, reflecting its	Amend zoning maps so the area between Moorhouse Ave, the railway line, Colombo Street and Waltham Road is zoned Commercial Retail Park.

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			accessibility, land area and constraints.	
15. South side of Blenheim Road	15.1 The proposed zoning as Industrial General does not take account of the lawfully established activities	1	The proposed Industrial General zoning recognises the existing activities but seeks to restrict further retail and office development going forward. The environment while mixed is still industrial in part and the zoning seeks further development of industrial activity.	No change
<b>Growth &amp; Recovery Strategy</b>				
16. Restricting offices in industrial zones	16.1 Opposes new restrictions on offices in industrial zones – specific areas cited: Wigram, Moorhouse, Blenheim Road, Leslie Hills Drive. Alternative commercial zoning sought to recognise existing uses.	4	The Proposed DP seeks to restrict non-industrial uses locating in industrial areas to avoid reverse sensitivity effects, and to support recovery of the central city. The existing commercial uses operating in this area can continue under existing use rights and/or resource consent.	No change
	16.2 Opposes office restrictions in the GI Zone, particularly in respect of currently zoned B4 land at 98 Wrights Road, Addington (approved under Plan Change 58 in 2012).	1	See above comments above re central city recovery. Submitter states that concept plans have been prepared for a resource consent application. The Operative City Plan policies and rules continue to have effect until such time as the Proposed Plan provisions are made operative or can be afforded sufficient weight through the Plan Review process.	No change
	16.3 Support additional controls and restrictions imposed on out of centre office and retail activity in recognition of the primary role of the Central City and other Centres to support activity and employment and to minimise reverse sensitivity	2	Noted.	No change

Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
	issues.			
	<p>16.4 Significant concerns with policy and regulatory approach to office development within industrial zones which is inconsistent with the Christchurch Central Recovery Plan</p> <p>- Industrial offices are considered to be fundamentally different in nature to professional and government offices sought within the CBD and should be provided for</p> <p>The current proposed limit of 250 m2 is considered impractical and inappropriate</p>	1	<p>Large scale office activity associated with an industrial activity can have similar effects as professional/ government offices if not subject to an assessment. In some cases, there may be merit in a larger quantum of offices beyond an ancillary function, which is reflected in a Full discretionary activity status.</p> <p>Limits are introduced to provide clarity and certainty regarding what is ancillary in function. Those with more office space than the threshold can be assessed on a case by case basis to determine the effects of a greater amount of office space. However, an increase in the thresholds for ancillary office floorspace is considered appropriate to recognise recent developments in industrial zones and to reduce the number of resource consents, relative to the draft rule.</p>	Rules amended for ancillary offices, increasing the thresholds from 250 m2 or 25%, whichever is the lesser, to 500m2 or 30%, whichever is the lesser.
17. Office Parks	<p>17.1 How the policy overlay or Policy 5 are to be interpreted or applied is not clear</p> <p>Amendments are put forward to Policy 5 with a new policy 6</p> <p>A specific zoning is sought for Office Parks or alternatively, provisions in the Activity table</p>		<p>It is recognised that the office park at Show Place is not fully developed and consents have been issued for its further development. Having regard to this and the potential for redevelopment in the other office parks, the existing office parks are zoned accordingly with clear policy direction in policy 6.</p>	<p>New policy 6 to support the continuation of office activities in office parks while providing a zoning specific to the activity</p> <p><b>Refer to 16.5.2, page 138 for the rules</b></p>
18. Retail activities in industrial zones	<p>18.1 The existing provisions in the City Plan are considered to be appropriate and there is no</p>	1	<p>The City Plan as amended by Variation 86 still provides for retail activities, subject to meeting different floor area thresholds. This</p>	No change

Chapter Reference / Issue	Views Expressed	No.	Staff Comments	Action
	explanation/awareness of evidence to demonstrate that the existing provisions are not efficient or effective		threshold approach is not considered to be effective in reducing the dispersal of retail activity that has occurred in recent years and in giving primacy to the Central City and Key Activity Centres	
	18.2 Policy 4 is considered to be weak in providing a suitable framework to consider and limit the proliferation of retail activity. Wording suggested	1	The policy should recognise the uses that are provided for in the rules and anticipated in industrial zones. An addition to refer to uses that support workers and businesses is appropriate. The proposed policy has been tested through internal and external reviews and does not require further change.	Policy 4 ( <b>page 4</b> ) amended to include the wording “support the needs of workers and businesses in the zone for food and beverages, commercial services, and the care of children”
19. Port of Lyttelton	19.1 Exemption from rules sought for containers to recognise role of the port (including inland port).	1	No restrictions on containers could result in adverse effects including shading, loss of outlook, on adjoining properties of containers stacked to significant height.	No change
	19.2 Opposes non-complying activity status for hazardous substances.	1	Standards for the use and storage of hazardous substances to be considered as part of phase 2.	Rules referencing the relevant standards for hazardous substances removed.
	19.3 Queries ancillary residential activity provided for in Industrial General Zones	1	Agree, there is potential for reverse sensitivity effects and forms of residential activity not appropriate in industrial zones	Ancillary residential units as a permitted activity deleted.
20. Lyttelton	20.1 Extension of town centre zone into industrial area sought	2	Extension of the town centre zone could constrain capacity for industry in Lyttelton while also leading to a lower concentration of activity in the town centre, limiting its vitality and amenity.	No change
<b>Other activities</b>				
21. Warehousing	21.1 With an activity based plan, explicit reference should be made to Warehousing in the list	1	While the definition of Industrial activity includes warehousing, separate reference to warehousing as a permitted activity makes it	Activity tables amended to include “Warehousing and Distribution activities” as permitted e.g. <b>Rule 16.2.2.1 P2 (page 7)</b>

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	of permitted activities. Interpretation that Warehousing is a Non-complying activity in draft.		explicit	
Proposed Rules				
22. Fence Height	22.1 Requests permitted threshold be amended to allow for fences up to 2.4m height where they are at least 50% transparent	1	Allowing fences up to 2.4 metres could impact on the amenity of public space. Appropriate to consider on a case by case basis.	No change
23. 6m setback	23.1 Opposes increase from 3m – inefficient use of land.	1	Separation of 3 metres is considered to be insufficient to minimise effects on the adjoining environment of industry.	No change
24. Hazardous substances	24.1 Appropriate recognition and provision in Plan needs to be made for LPG retail, storage and associated works. - Protection against reverse sensitivity, - Landscaping requirements should be appropriate (due to safety) - Provision should be made for LPG storage and retail in Rockgas' existing locations at Woolston (Business 5), Byron St (Business 3) and service stations throughout City. Provision should be made for ancillary retail activity	1	The use and storage of hazardous substances to be dealt with in phase 2 of the DPR.  Provisions for protecting industry including LPG facilities are included in the draft chapter with separation from more sensitive land uses through restrictions on non-industrial activities. Notwithstanding this, provision is made for ancillary retail activity  Landscaping requirements are more permissive than the current city plan, recognising the functional requirements of industry.	No change
25. Transmission lines/ infrastructure	25.1 The draft rules should be updated to reflect the most up to date guidance on the	1	The provisions put forward to enable buildings in the 12 metre setback (draft does not provide for any activity as a permitted	Amendments to Activity tables throughout chapter (e.g. <b>Rule 16.2.2.1 P15, 16.2.2.3 RD2 and 16.2.2.5 NC1 – NC3</b> )

<b>Chapter Reference / Issue</b>	<b>Views Expressed</b>	<b>No.</b>	<b>Staff Comments</b>	<b>Action</b>
	activities permitted in setbacks from transmission lines		activity) while also restricting buildings in proximity to National Grid support structures are appropriate and included.	
<b>Proposed Rules</b>				
26. Crime prevention and safety	26.1 There is no mention of CPTED or safety in the industrial chapter	1	It is acknowledged that safety and crime prevention are important issues in industrial zones and the chapter should address these issues	Addition to Policy 9 to state "Development is designed and laid out to promote a safe environment and reflects principles of Crime Prevention through Environmental Design (CPTED)"

## 8.0 BIBLIOGRAPHY

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Letter from Property Group – Peer review of chapter – Refer to Appendix 9.4	Property Group
Workshop – Multi-disciplinary workshop with Council officers, September 2013	Christchurch City Council staff
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<b>South West Hornby ODP area</b>	
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<i>(Hornby) and CB7 (Hornby West) Greenfield Business Areas, July 2013</i>	
<i>Archaeological Assessment Outline Development Plan (ODP) Hornby Greenfields Marshs and Shands Road SW Christchurch Proposed Urban Plan Change for Christchurch City Council, March 2013</i>	Kevin Jones
Memo dated 8 August 2013 from Jenny Moore, Senior Landscape Architect, CCC to Alison McLaughlin, CCC <i>“South West Greenfields Industrial Area CB2/ CB7 – Comments relating to Publicly notified plan change greenlayer”</i> Recommendations on landscaping for Southwest greenfields industrial area CB2/ CB7	CCC
Project: Geotechnical Investigation Report for the 132ha block of land in the southwest area of Christchurch for suitability for industrial development, May 2013	Aurecon
<i>Urban Growth Areas CB2 &amp; CB7: South-West Christchurch Plan Change Stage 1 Preliminary Site Investigation (Contamination), October 2013</i>	Aurecon
Email from Peter Barnes, Greenspace, CCC to Alison McLaughlin, CCC RE: Discussion re. open space in CB2/ CB7 greenfield area, 26 June 2013	CCC
<b>Cookie Time</b>	
<i>Plan Change Request to the Christchurch City Plan (PC38) – Proposed Business Zoning, September 2013</i>	Aurecon for Mayell Property Trust
Consultation letters, information for the affected parties and summary of feedback, 2013	Aurecon for Mayell Property Trust
Consultation with New Zealand Transport Agency on the proposed Private Plan Change 38 (Cookie Time), 2013	Christchurch City Council



## **9.0 APPENDICES**

APPENDIX 9.1	KEY STRATEGIC DOCUMENTS
APPENDIX 9.2	LINKAGES BETWEEN PROVISIONS
APPENDIX 9.3	PROPERTY ECONOMICS REPORT
APPENDIX 9.4	PEER REVIEW OF CHAPTER BY THE PROPERTY GROUP
APPENDIX 9.5	ADVICE FROM DAVID COMPTON-MOEN TO INFORM INDUSTRIAL CHAPTER



