

MEMORIAL BUSINESS PARK

Assessment of Environmental Effects

**Plan Change Request pursuant to clause 20 of the
Canterbury Earthquake (Christchurch Replacement
District Plan) Order 2014**

MEMORIAL AVENUE INVESTMENTS LIMITED

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1. INTRODUCTION AND CONTEXT

- 1.1 This report has been prepared to fulfil the requirements of Clause 22 (Assessment of Environmental Effects) of the Resource Management Act 1991 (**RMA**) and Clause 20(2)(c) of the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014 (**the Order**) in respect of the rezoning of the land on the corner of Russley Road and Memorial Avenue, Christchurch, referred to as Memorial Business Park (**MBP**). The rezoning of the site to a business zone is required by the Land Use Recovery Plan (**LURP**) promulgated by the Minister of Earthquake Recovery under the Canterbury Earthquake Recovery Act 2011.
- 1.2 The site is bounded by Memorial Ave to the north, Russley Road to the west, Avonhead Road to the south and the Living 5 (Travellers' Accommodation) Zone to the east. MAIL is the primary landowner in this area, holding five of the seven lots.
- 1.3 It is proposed to rezone the site from the current Rural 5 (Airport Influences) Zone to a new site specific Industrial Park (Memorial Avenue) Zone.

Land ownership

- 1.4 MAIL took ownership of most of the land in December 2008 and owns Lots 1, 2, 4 and 5 DP 28780 and Lot 1 DP 74459, or approximately 80% of the Plan Change site. Two lots are in separate ownership – Lot 6 DP 28780 (owned by Gary McVicar) and Lot 2 DP 74459 (owned by International Motor Inn Ltd).

Approach and key features of the proposed rezoning

- 1.5 The zoning proposed for the site is a site specific Industrial Park zoning.
- 1.6 The objective of the Industrial Park (Memorial Avenue) zone is to provide for a range of business industries and uses which seek a high amenity environment supported by a network of high quality streets and well-designed open space.
- 1.7 In addition to the general provisions of an Industrial Park zone, detailed provisions are proposed for the site which address resource management issues specific to the desired development outcome. In particular, the following matters have been recognised through the provisions proposed:
- a. Addressing the three main public realm edges of the site, including the 'gateway' function of the site along Memorial Avenue;
 - b. Effects on landscape and amenity;
 - c. Constraints of wastewater infrastructure;
 - d. Possible effects on the transport network; and
 - e. Restrictions on the types of retail and office development to avoid effects on the CBD and Key Activity Centres.
- 1.8 To address those issues, a number of amendments are proposed to the general provisions for the Industrial Park zone including:
- a. The provision of an Outline Development Plan (**ODP**) to provide for the integration of vehicle and pedestrian circulation, landscaping, stormwater management and built development;
 - b. Provision for buildings on the boundaries of the zone to be subject to specific urban design criteria assessment;

- c. Specific provisions in relation to building height and building coverage;
 - d. Constraints and restrictions on the type and amount of retail and office uses; and
 - e. Restrictions on certain activities within the proposed Runway Extension Protection Area and on the land owned by the Commodore Hotel.
- 1.9 The strategic outcomes for which have informed the development of the ODP and specific rules are to:
- a. conserve and enhance key features of the site;
 - b. develop built forms that integrate with the surrounding landscape and public realm;
 - c. create a well-connected, multi-use movement network; and
 - d. deliver high quality streets and open spaces.
- 1.10 The Outline Development Plan (ODP) will be the key method to ensure the integration of development and achieve the proposed environmental outcomes. There are four principal elements to the ODP. These are:
- a. Inclusion of setbacks which respond to each edge condition on the boundary of the zone;
 - b. The movement network, being to create a number of connections across the site and create a pedestrian and cycle friendly environment;
 - c. The creation of two open spaces located to ensure they are easily accessible for all users; and
 - d. Identification of areas where no additional building is permitted, where guest accommodation is restricted to, and where CIAL has sought a designation for a Runway End Protection Area.
- 1.11 The benefits of utilising the major area of the land for an integrated mixed use industrial park are significant and include:
- a. A larger part of the site is in single ownership and can be developed in an integrated, sustainable and comprehensive manner;
 - b. The land is well suited to the mixed uses which will not impact adversely on any neighbouring activities;
 - c. The site has excellent and immediate access to support facilities, employment and transport links;
 - d. The area is well served by all forms of transport be it the airport, road network, bus services, walking or cycling, with good access to recreation and open space;
 - e. It will give support to a number of other Christchurch businesses and facilities;
 - f. It can be developed in a manner which will improve wider community amenity in the area through walking access and a landscape and site design compatible with surrounding land; and
 - g. The activity will make a major contribution to the economic, employment, social and cultural recovery of Christchurch post-earthquake.

- 1.12 The result will be to consolidate an important economic activity of benefit to both the city and the country undertaken in highly innovative buildings and a landscape setting which is attractive to a worldwide employment market.
- 1.13 MAIL has assembled a full complement of technical consultants to inform the development of the rezoning proposal, including:
- a. Kim McCracken – planning and resource management;
 - b. Pocock Design:Environment – urban design and landscape;
 - c. Davie Lovell Smith – infrastructure and servicing;
 - d. Carriageway Consulting Limited – traffic;
 - e. URS Corporation – groundwater and noise;
 - f. Insight Economics – retail economics and retail distributional effects; and
 - g. Telfer Young – business land and office distributional effects.
- 1.14 This report summarises the assessments made by the various technical consultants listed above, with those assessments appended to this report.

2. VISUAL IMPACT AND URBAN DESIGN

- 2.1 Pocock Design Environment Limited has been engaged to undertake an assessment of the landscape effects arising from the rezoning, and to recommend an urban design approach for inclusion in the proposed plan provisions which will achieve a functional and high amenity development.
- 2.2 The site currently forms an interface between the city edge and the Airport zone. It exhibits a different character to the nearby rural and open space land because of its enclosed nature within a number of urban activities. The landscape which the site sits within is not an outstanding natural landscape and does not contain outstanding natural features. Major changes will take place to the Russley Road / Memorial Avenue intersection and the assessment and consequent Outline Development Plan has taken into account the likely impacts with the design. In particular the 'gateway' to the city will be provided by developments within the Special Purpose (Airport) Zone, and the proposed feature bridge and overpass at the intersection of Memorial Avenue and Russley Road.
- 2.3 The proposal to develop the site for a range of business purposes has a strong design rationale and the site is located in an appropriate landscape and urban context for such development.
- 2.4 There are different design approaches for all four edges of the site, in order to effectively manage the existing and future sensitivities that may arise as a result of the development. In many cases the proposal will strengthen the surrounding community by enhancing the landscape amenity and pedestrian/cycle connections. Visual effects are appropriately mitigated by landscaped setbacks identified on the ODP and built standards.
- 2.5 Significant areas of open space and landscape amenity are proposed as well as a framework of tree-lined roads and planting to enhance existing cultural and historical values. There is also potential to recognise the memorial function of this location through landscape or art features.

- 2.6 All buildings within 50m of Memorial Avenue, Russley Road or Avonhead Road will be assessed for their urban design quality and contribution to the high quality business setting sought. This directive approach to urban design is considered to be the appropriate response to what is a high profile location for Christchurch City.

Effect on rural character

- 2.7 The site is bordered by at least two sides of urban activity, but is visibly rural in character. As a landscape type, it is fairly typical and widespread around the periphery of the City. Ultimately the proposal will result in a significant change from a rural landscape which is characterised by open space and pastoral landscape character to a more urban and built environment. This will be a significant change to the current landscape character and associated views into the site. However, this land is within the urban boundary, is surrounded by residential and industrial development, and accordingly such a change would not be an unexpected outcome. The development is appropriate within the local setting. The preparation and implementation of the Outline Development Plan and the landscape and urban design provisions for the Industrial Park Zone will enhance visual coherence and amenity in this sector of the city.

Effects on adjacent land users

- 2.8 The site will be subject to a comprehensive Outline Development Plan which specifically addresses the impacts on the surrounding neighbours. The land will be subject to a range of controls on site coverage, building height, open space and internal connectivity so as to minimise any impact on the adjoining neighbours. Setbacks of differing widths which are appropriate to each external boundary of the site are imposed to address visual impact and enhance landscape amenity for adjacent land users.

3. TRAFFIC AND ACCESS ASSESSMENT

- 3.1 Carriageway Consultants Limited has identified, assessed and evaluated the various transport and access elements of the proposal.
- 3.2 A transport model has been used to assess the effects of developing the site and demonstrated that even with full development, each intersection and turning movement in the immediate area will operate with an acceptable level of service. . Any increased queues or delays at the location will be internal to the site and will not affect the operation of the frontage road.
- 3.3 The safety record in the area of the site is very good, and there is no evidence to suggest there are any deficiencies in the roading network, other than at the Russley Road / Memorial Ave intersection which is shortly to be upgraded. Accordingly, it is not considered that the presence of development related traffic will result in any road safety matters arising.
- 3.4 No adverse effects on non-car modes of travel are anticipated as a result of the development of the site. Rather it is considered that the provision for these road users will be enhanced through a new pedestrian crossing and new pedestrian and cycle routes.
- 3.5 Carriageway Consulting concludes that the proposed development can be supported from a traffic and transportation perspective.

4. RETAIL DISTRIBUTIONAL EFFECTS

- 4.1 Insight Economics has been engaged to ascertain the extent and type of retail floorspace that could be established on the subject land without resulting in adverse retail distributional effects on the CBD, existing key activity centres and district centres within the Christchurch network.
- 4.2 Insight used a retail gravity model to estimate potential trade effects replicating existing large retail centres found within Christchurch on the site. This is a significantly greater level of retail than are proposed in this plan change application.
- 4.3 The model demonstrated that trade impacts on the Central City and Key Activity Centres arising from the modelled level of development would be minor.
- 4.4 Insight's conclusion is that it is extremely unlikely that the trade effects for the modelled scenarios for would cause any stores to close. According, flow-on social and economic effects arising from the levels of retail proposed in this plan change on the CBD, key activity centres or other district centres will be very minor and short-lived.
- 4.5 One of the key reasons why the trade effects of even significantly greater levels of retail are so low on the MBP site is that it is located about the same driving distance from seven other centres. As a result, trade impacts are being widely dispersed, not shouldered by only one or two centres.
- 4.6 In respect of the CBD specifically, Insight report that the proposed retail development would have minimal impact on the CBD rebuild because:
- a. Estimated CBD trade impacts are low, ranging from less than 1% to only 8%, dependant on store type.
 - b. Retail has historically accounted for only a modest share of CBD employment (about 10%), and the CBD's share of retail activity has been steadily falling over time. Retail is not as critical to the CBD as some may believe.
 - c. According to a recent UMR Research survey, only 11% of retailers want to be in the new CBD, with most seeking a location elsewhere in Christchurch. With the specific rules on retail which are proposed, MAIL is unlike to attract retailers that would have otherwise sought a CBD location.

5. BUSINESS LAND ASSESSMENT

- 5.1 Telfer Young was commissioned to undertake a business land assessment to inform the development of the rezoning and consider the resource management merits of rezoning for mixed-business development. In doing so, Telfer Young considered the specific characteristics of the site and the existing and likely future supply of business land in the Greater Christchurch area.
- 5.2 Telfer Young conclude that the highest and best use of the property is for a mixed use development featuring industrial, retail, service, hospitality, office and tourist accommodation. The locational advantages of the site underpin the long term sustainability of this type of development.
- 5.3 Telfer Young analysed the supply of industrial land in Christchurch and conclude that the land available for industrial development comprises some 730 hectares. Based on long term take-up rates there is some 25 years supply of industrial land. Including all vacant zoned land and land identified within the Land use Recovery Plan for Christchurch and Selwyn there is some

35 years supply of industrial land. Having considered all factors Telfer Young concluded that provision for other activities within the plan change site will not have adverse effects on the supply of industrial land in Christchurch.

- 5.4 The analysis considered key activity centres in terms of their location, current product mix, and their recent economic performance. Retail essentially drives the desirability of the key activity centres. The effect on nearby key activity centres of establishing office accommodation on the site is likely to be minimal. The analysis considered that a selected group of office accommodation users could be permitted to establish on the site without adverse effect on the recovery of the CBD.
- 5.5 In respect of CBD recovery, construction activity is gaining momentum with a number of developments now completed. There is strong interest from pre-quake CDB tenants and the Government sector to re-establish in the CBD. Rental rates are high by Christchurch standards but not by national or international levels / benchmarks. Telfer Young conclude that the CBD recovery is underway.
- 5.6 Telfer Young recommended that potential effects on CBD recovery arising from enabling office activity on the site could be addressed one of the two means. The first is to restrict development to specific types of office use. These office types would locate at the site because of the site specific attributes of the site and would not consider the CBD as an alternative. Alternatively, limits could be imposed on the quantum of office development. The proposed rules limit office development to quantum which Telfer Young considers to be very conservative. Telfer Young assessed that a significantly greater level of office development than proposed could be accommodation on the site utilising a combination of the two controls.

6. **GUEST ACCOMMODATION**

- 6.1 TRC Consultants have advised on the suitability of the site for guest accommodation and whether there would be any adverse effects particularly with respect to the rebuild of the CBD. The study concludes that guest accommodation comprising up to 200 rooms or a motel of up to 50 units could be accommodated on the site and would not impact on the CBD recovery.

7. **INFRASTRUCTURE AND SERVICING**

- 7.1 Davie Lovell Smith (“DLS”) was commissioned to address civil engineering, infrastructure and servicing issues related to the subject land. The key issues here relate to:
- a. Wastewater disposal;
 - b. Stormwater disposal; and
 - c. Water supply.

- 7.2 In addition, URS has been engaged to assess potential for effects on groundwater.

Wastewater Disposal

- 7.3 The city reticulated sewerage system is located on Avonhead Road and extends as far as the subject land. Following analysis of the greater Christchurch sewage network DLS has advised there is temporarily insufficient capacity in the network to meet the development's demand for servicing. Sewer upgrades currently being undertaken by the Council will provide the required

capacity by 2019 at the earliest. The plan change includes a rule which requires non-complying resource consent for development in advance of the sewer upgrade.

- 7.4 An investigation has begun into ways in which the connection delay can be avoided. The potential for storage of the sewer flows for release at night has been discussed with Council and they are now investigating this potential option. Council has previously approved this option at an industrial subdivision in Hornby. Such a solution would be temporary until upgrades are completed.
- 7.5 All business development areas within the site can gravitate sewage to the existing council infrastructure without a pump station. Connection to the Council sewer main could be obtained by constructing a single manhole on the line of the existing pipe on Avonhead Road. Connections to individual properties within the proposed development will be detailed at the time of the subdivision consent application but these connections will be constructed in accordance with City Council and New Zealand Building Code standards.
- 7.6 Should the Council consider that the storage of flow and release during the night is acceptable; the storage volume will need to be established. An off line tank may need to be incorporated into the system but initially at least the storage can be provided by the pipes and manholes of the proposed system.
- 7.7 While it is acknowledged that trade waste discharges may occur from a development of this nature, the extent of such discharges cannot be determined at this stage. Trade waste discharge approvals will need to be obtained from the Environment Canterbury and accordingly matters of quality and quantity will be addressed at that time.

Stormwater disposal

- 7.8 There is no formal City Council stormwater reticulation in the area to service this site.
- 7.9 Preliminary geotechnical testing and investigations have been carried out on site and these show that the underlying soils are conducive to good soakage conditions.
- 7.10 The natural fall of the site is to the southeast to two low points, one in the southernmost corner of the site and the other in the natural flow channel adjacent to Memorial Avenue. The site can be earthworked to ensure that the majority of the potential development will fall to the south of the site. A single large stormwater disposal facility will be constructed in this location. The smaller remaining northern catchment will have some roof area that will go directly to ground, a small amount of road surface that we would expect to drain onto Memorial Avenue and a remaining large area of planting that can also be discharged directly to ground.
- 7.11 Due to the site's proximity to the airport, it is important to ensure that standing water is avoided. Water left standing for a prolonged period will attract birdlife and this in turn elevates the risk of birdstrike with aircraft. For this reason the use of swales and basins need to be restricted. The options proposed recognise the airport's requirements.
- 7.12 The proposed drainage network layout and pipe size requirements will be designed in accordance with Council's standard assessment criteria for the Industrial Park zone. The stormwater design will also comply with the requirements of Christchurch City Council's Standard Specification, CSS: Parts 3: 2013, CCC IDS and the CCC Waterways, Wetland and Drainage Guide.
- 7.13 All pipes will be designed for a 1 in 5 year storm event. For all flows greater than this event a secondary flow path will be incorporated into the site. The secondary flow path will direct flows to the proposed road networks and onto the proposed stormwater disposal areas.

- 7.14 The storage areas will take the shape of basins and will be designed to contain up to a 1 in 50 year event. The storage basins will be fitted with soakage facilities to ensure that water from the 1 in 50 year event, is not standing in the basin for any period greater than 24 hours.

Groundwater

- 7.15 MAIL commissioned URS Corporation to assess the groundwater conditions of the subject land because it is situated over the unconfined aquifer which provides drinking water for Christchurch.
- 7.16 URS has assessed the soil characteristics and groundwater conditions of the land, and considered these in the context of the likely stormwater discharges to occur as a result of the proposed change in land use.
- 7.17 The proposed use of the site will result in higher volumes of stormwater being generated and a change in the type of contaminants present in stormwater at the site. Contaminants (because of the proposed urban use) will be suspended solids, heavy metals and hydrocarbons. Modern stormwater treatment devices allied to natural attenuation processes can minimise the contaminant load that finally enters the ground. Stormwater management on the site will utilise at source contaminant measures, low impact design methods, treatment devices, monitoring and maintenance to minimise the potential for adverse effects on groundwater quality beneath the site.
- 7.18 Stormwater discharges from larger sites have been authorised by ECan in recent times, including for activities on the airport land. This approach is consistent with both the NRRP and the proposed Canterbury Land and Water Regional Plan. The Environment Court has also taken the view that development can proceed over the aquifer where a high level of stormwater treatment is undertaken.

Water Supply

- 7.19 It is proposed that the site will be serviced from connections to the existing infrastructure. The existing water mains on Avonhead Road and Memorial Avenue will provide inadequate flows and pressure. It is currently intended that a pipe will be laid from Roydvale Avenue, along Memorial Avenue to the site, through the site to Avonhead Road and finally along Avonhead Road to a main in Hawthorndon Road. This connection will improve the reliability of service to the area.
- 7.20 The internal network of the site will be designed to the City Council's business standard (industrial/commercial). This will include standards for pipe sizes, residual water pressures and flows.
- 7.21 If it is determined that there is an actual shortfall in water supply and pressure in the vicinity of the site, supply can be improved by a number of means, including the provision of booster pump stations, upgrading pipe sizes and upgrading the existing pumps.

8. NOISE ASSESSMENT

- 8.1 URS Corporation has assessed the noise environment of the site to assess the range of activities that are appropriate, including noise mitigation / insulation measures recommended for specific activities. This is a particularly pertinent issue for the subject land because of the close proximity of Christchurch International Airport and the associated noise contours overlaid on the land in both the City Plan and the Regional Policy Statement (modified by the LURP). URS's assessment also addresses reverse sensitivity considerations imposed by the adjoining state highway (State Highway 1 / Russley Road).

- 8.2 Unless a resource consent is obtained, all activities located in the development are required to meet the noise limits of the neighbouring zones at the boundary, regardless of whether or not the land is rezoned. The neighbouring zones are a Special Purpose (Airport) Zone, Living 5 Zone and Rural 5 Zone. On the basis of the existing noise environment, URS predicted that the potential noise effects of activity in the proposed zone would be no more than minor at all neighbouring sites, given that the existing noise control provisions of the City Plan provide appropriate protection. In keeping with this URS recommends that the proposed Industrial Park zone be categorised as a “Group 2” zone in terms of noise in the City Plan. This will ensure that appropriate indoor noise levels and levels of amenity are achieved throughout the zone.
- 8.3 The development is adjacent to both an airport and major arterial roads. To ensure adequate protection is provided to future occupants of the proposed zone and to minimise any reverse sensitivity issues for Christchurch International Airport Limited and the New Zealand Transport Agency, both aircraft and road traffic noise must be appropriately mitigated.
- 8.4 Travellers' accommodation will be restricted to the Special Amenity Area in the north-west of the site and located between the 50 and 55 L_{dn} airport noise contours. Indoor design sound levels for hotels can be achieved in this location using standard construction techniques.
- 8.5 In respect of road noise, URS advises a rule requiring internal noise levels for bedrooms of travellers' accommodation meet $40dB L_{Aeq(24h)}$ would adequately address noise effects to travellers' accommodation.
- 8.6 URS concludes that in all instances, with appropriate rules adopted from the City Plan, the development could occur in the proposed zone with no more than minor noise effects.

9. GEOTECHNICAL CONSIDERATIONS

- 9.1 Detailed site investigations have been undertaken by Aurecon. The reports assessed the ground conditions and confirm that there are no findings which would preclude development on the site subject to the need for the appropriate foundation design. The investigations did not encounter anything adverse with regards to ground conditions in terms of building requirements. They conclude that from a geotechnical perspective the site is suitable for the proposed rezoning.

10. LAND CONTAMINATION

- 10.1 Preliminary site investigations were undertaken in accordance with the Contaminated Land Management Guidelines No 1 (MfE October 2011) in order to determine the suitability of the site for business use and the likelihood of consent being required under the National Environmental Standard for Assessing and Managing Contaminants in the Soil to Protect Human Health Regulations 2011 at the time the standard applies. The NES is not applicable at the plan change stage, but will apply on subdivision and development of the site to give effect to the business zoning.
- 10.2 The risk assessment identified on and off site source pathway receptor linkages (between potential sources of contamination and potential human and environmental receptors) with a risk classification in the range of negligible to moderate. Based on the risk assessment and in view of the future business use the report considered that it is highly unlikely for contamination to exist in concentrations significant to exceed human health screening criteria. The proposed change in land use is therefore considered to be a permitted activity under the NES. Earthworks associated with development of the site may exceed permitted volumes and consent would therefore be required for those activities.

11. OTHER POTENTIAL EFFECTS

Glare

- 11.1 The relevant provisions of the City Plan (Group 1 and 2) glare standards will apply. In terms of lighting, the development accords with the outcomes sought by the Civil Aviation Authority and the Airport Company.

Construction effects

- 11.2 Any potential adverse effects resulting from construction activities will be managed by the appropriate construction management plan at the time of construction. The principal effects are noise and dust. A number of mechanisms exist to manage dust nuisance (damping down, planting) while noise nuisance is unlikely to be unreasonable or noticeable given the current traffic and nearby industrial environment.

12. CONCLUSION ON EFFECTS

- 12.1 The subject land is located at the high profile intersection of Russley Road (State Highway 1) and Memorial Avenue. This is an important site for visitors arriving in and leaving Christchurch via the international airport. The current Rural 5 (Airport Influences) Zoning has undermined the potential of the land, and it has remained in an underutilised pastoral state for a number of years.
- 12.2 The proposed rezoning responds to all the relevant constraints and opportunities and the planning history of the subject land. It presents a well-rounded, site specific development concept that implements the Regional Policy Statement and the Land Use Recovery Plan. Specifically the plan change proposes a mixed business Industrial Park development within a high quality landscaped setting.
- 12.3 The rezoning will result in a number of beneficial effects, most particularly by providing a zoning outcome which is consistent with the objectives and policies of the City Plan, is supportive of the outcomes of the RPS, particularly and the more detailed outcomes sought by Chapter 6 in terms of new greenfield development and urban design, including Policy 7 (Development Form and Design) and Policy 8 (Outline Development Plans and Changes of Zoning in District Plans.)
- 12.4 The land is not being utilised for its most productive or efficient purpose and can provide for a more sustainable range of activities in terms of the City's natural and physical resources through the proposed zoning outcome. It will contribute significantly to the economic and social wellbeing of the community, delivering a consolidated business and employment opportunity in a location which is highly accessible to a large residential workforce.
- 12.5 Use of the land in the manner proposed does not conflict with, or necessitate any significant changes to the relevant operative and Replacement District Plan objectives and policies, and will satisfy principal objectives to provide for a range of business environments, accessible to employment, and developed to achieve a very high standard of site amenity.
- 12.6 The proposed zone rules will ensure that the development permitted by the zoning will not adversely affect the function and urban form of the CBD, Key Activity Areas or district centres.
- 12.7 All environmental effects, to the extent they have the potential to be adverse, can be mitigated and will allow business activity to be located and developed in a sustainable manner. The

outcome will be a substantial contribution to the city's social, economic, employment and social well-being and the built environment.

13. STATUTORY FRAMEWORK

Introduction

13.1 The rezoning has been prepared to implement the following documents which are addressed in this report:

- a. The Regional Policy Statement;
- b. Relevant regional plans;
- c. The operative City Plan and likely notified Replacement District Plan;
- d. Strategic Planning documents for Transport.
- e. The purpose and principles of the RMA.

Greater Christchurch Land Use Recovery Plan (LURP) and Canterbury Regional Policy Statement (RPS)

13.2 The purpose of the LURP is to ensure that efforts to restore and enhance greater Christchurch are well coordinated and facilitate a timely and expedited process for recovery from the effects of the Canterbury Earthquakes. The site is identified in the LURP as a Greenfield Priority Area – Business. The zoning proposed is consistent with the LURP – see Appendix 2 to the section 32 Report.

13.3 RPS Chapter 5 (Land Use and Infrastructure) and Chapter 6 (Recovery and Rebuilding of Greater Christchurch) set out the policy context for the rezoning. Chapter 6 (as inserted by the LURP) provides a resource management framework for the recovery of Greater Christchurch, to enable and support earthquake recovery and rebuilding, including restoration and enhancement, for the area through to 2028. The site is within the Boundary of Infrastructure Supported Areas identified in Chapter 6. The land is identified as a Greenfield Priority Business Area.

13.4 Appendix 2 to the section 32 Report provides a detailed assessment of the Plan Change proposal against the relevant objective and policies in the Regional Policy Statement.

The operative Christchurch City Plan (City Plan)

13.5 The purpose of the plan change is to provide for business zoned land in the north west area of Christchurch as directed by the LURP. Although the City Plan objectives and policies will be replaced by those contained in the Replacement District Plan, the plan change has been assessed against the relevant provisions for completeness. The existing City Plan objectives (Volume 2) of relevance include those for Urban Growth (Part 6) and Business (Part 12).

13.6 Appendix 2 to the section 32 Report provides a detailed assessment of the Plan Change against the relevant objectives and policies of the City Plan, and concludes that the proposed rezoning is consistent with the City Plan.

Likely notified provisions of the Replacement District Plan (Replacement Plan)

13.7 The proposed use of the land for business zone purposes can generally comply with all the expected outcomes sought for an Industrial Park zone environment, supported by the

provision of a comprehensive ODP which will reinforce the importance of urban consolidation, and additional provisions around enhanced urban design, and the integration of all the essential service elements necessary for urban business growth.

- 13.8 Appendix 2 to the section 32 Report provides a detailed assessment of the Plan Change against the relevant likely objectives and policies of the Replacement Plan, and concludes the proposed rezoning is consistent with those provisions.

Natural Resources Regional Plan and the proposed Canterbury Land and Water Regional Plan

- 13.9 Also of relevance to the site are the Natural Resources Regional Plan (NRRP) and the proposed Canterbury Land and Water Regional Plan (pCLWRP). These plans set the framework for discharges (to air and land) and water takes. This may require specific developments on the land to obtain resource consents in the future.
- 13.1 The application site is located within Groundwater Protection Zone 1 (related to the unconfined aquifer). Preliminary investigations have been undertaken to ensure a solution exists to address stormwater management. Development will be serviced by reticulated sewerage and water systems and this will not cause a conflict with the NRRP and the pCLWRP.

Strategic Planning documents for Transport

- 13.2 The Canterbury Regional Land Transport Strategy (2012-2042) contains five objectives of: ensuring a resilient, environmentally sustainable and integrated transport system; increasing transport safety for all users; protecting and promoting public health; assisting economic development; and improving levels of accessibility for all.
- 13.3 This site is located where the opportunity exists for comprehensive access for all modes of transport, particularly in terms of pedestrian and cycle access. There are existing bus services within close proximity of the site and the potential exists to create improved pedestrian access to, through and from the site. The Transportation assessment concludes that development of the site can be accommodated on the roading network without any adverse safety related issues arising.
- 13.4 A detailed assessment of the plan change against the following strategic planning documents is included in the Transportation Assessment:
- a. Canterbury Regional Land Transport Strategy (2012-2042)
 - b. Christchurch Transport Strategic Plan (2012-2042)
 - c. Canterbury Regional Public Transport Plan (2012)
 - d. Canterbury Regional Travel Demand Management Strategy (2008)
- 13.5 The Transportation Assessment concludes that the plan change is consistent with these strategic planning documents.

Resource Management Act 1991

- 13.6 The requirements of the RMA are central to this rezoning and are comprehensively addressed in the Section 32 Assessment report and in the Assessment of Environmental Effects report.

Section 6 and 8 – matters of national importance / Treaty of Waitangi

- 13.7 There are no matters of national importance or in respect of the Treaty of Waitangi that will be impacted by the Plan Change.

Section 7

- 13.8 In considering the “efficiency” of the site for the proposed zoning, the following factors are paramount:

- a. The desirability of providing for a well located supply of business land;
- b. The ability to achieve a well-planned and integrated urban business environment;
- c. The proximity to strategic infrastructure;
- d. The efficient and sustainable extension and provision of services such as roads;
- e. Wastewater, stormwater, water supply and flood protection;
- f. Restricted ability for the site to be used reasonably and economically for rural activity;
- g. The opportunity to develop a business environment in an energy efficient and sustainable manner.

- 13.9 The RPS and the Land Use Recovery Plan direct that this site be rezoned for business activities. The site will supply business land for the anticipated growth of the city and will contribute to the growth of the Christchurch and New Zealand business economy, as well as community wellbeing. The ODP provides for efficient and well planned connections to the road network and infrastructure. The site can be connected to all the essential services.

- 13.10 Under sections 7(c) and 7(f), particular regard must be had to the maintenance and enhancement of amenity values and the maintenance and enhancement of the quality of the environment. The amenity of the existing rural environment will be changed, but the Plan Change provides for a sensitive development outcome that mitigates the effects on adjoining land. Potential for noise effects can be addressed by the imposition of the noise standards contained in the City Plan.

- 13.11 Under section 7(g) the RMA requires particular regard to be had to any finite characteristics of natural and physical resources. The rural resource is finite, although in this case the subject land cannot be efficiently maximised as a rural resource because of its size and the restrictions the City Plan places on intensive farming activities close to residential activity. The City Plan, Section 13, Rural - Objective 1.1 states that the rural resource is to be managed to achieve a number of outcomes including scope for the extension of urban activities.

- 13.12 In terms of section 7(i) and (j) the outcome represents an energy efficient and sustainable outcome for new business activity both at a macro level in terms of urban consolidation and use of infrastructure, and at a micro level where new development within the Industrial Park (Memorial Avenue) zone area will enhance all forms of transport.

Section 5(1)

- 13.13 Under section 5(1), the overall purpose of the Act is to promote the sustainable management of natural and physical resources. The proposed zone promotes the sustainable management of natural and physical resources by providing for an appropriate use of the land given its proximity to strategic infrastructure and the principal objectives of the RPS and the Land Use Recovery Plan, including to make provision for additional business land in the north west area of the City.

- 13.14 Continued use of the site for any agricultural purposes would be contrary to the RPS. It is also constrained by the site's size, location and proximity to urban users. Given the goal of providing for business land in the north west area of the City, retaining the existing rural zoning of the site is not the best or most sustainable use of the land. Extending urban business zoning to the site will better achieve the purpose of the Act and significantly enhance the economic and social wellbeing of the community.
- 13.15 The proposed zoning promotes the sustainable management of physical resources. Infrastructure can be provided for in a manner that efficiently utilises the systems already in place for the growth of north west Christchurch, minimizing the need for additional major new services.

Section 5(2) (a) – (c)

- 13.16 Utilising the land for mixed business activity in the manner proposed will help meet some of the future greenfield business land needs in Christchurch. It will also support a choice of business environments in the city, a supply of appropriately located business land within reasonable proximity of, and with access to strategic infrastructure (road network, the airport and other related services), and provide the opportunity to create an attractive urban environment and work place necessary to attract and retain staff. The rezoning and resulting provisions address the landscape, urban design and on-site amenity objectives and provide for an integrated zoning outcome, while avoiding or mitigating any adverse effects on neighbouring land.
- 13.17 The adverse effects of development of the site under the proposed site specific Industrial Park (Memorial Avenue) zoning are outlined in the previous sections of this report, which conclude that all adverse effects can be appropriately managed.

Conclusion

- 13.18 Having regard to the above, it is concluded that the objectives and policies of the operative City Plan, the likely notified relevant sections of the Replacement Plan, the Regional Policy Statement, and the Land Use Recovery Plan are met. The proposed plan change will achieve the principles and purpose of the Act for the following reasons:
- a. The use of the site in the manner proposed would be more efficient than the current rural zoning given both the City Plan and Regional Policy Statement objectives for urban activity and business growth and a general Industrial Park zoning;
 - b. Development of the site as proposed does not present any environmental risk;
 - c. The site is situated in a location which can provide for integrated and sustainable development for business activities including all the necessary servicing and infrastructure for those activities, as well as access to all transport modes be it private car, cycle, bus or walking. The methods proposed will enhance the opportunity for business use and the critical amenity considerations necessary for an attractive business development;
 - d. The proposed rezoning will allow positive benefits to accrue to the local, regional and national economy;
 - e. The development can be designed in a manner which will ensure an integrated outcome for future urban growth; and
 - f. The outcome will make a valuable contribution to earthquake recovery, and will not adversely affect the CBD recovery, Key Activity Centres or other centres.

- 13.19 Overall, properly managed business development as proposed by the plan change offers a range of significant resource management benefits, and is considered to be consistent with the purpose and principles of the RMA.