

**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.

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

b.	Canterbury Earthquake Recovery Strategy	Economic Recovery Programme	<p>Consistency is achieved with the following provisions:</p> <ul style="list-style-type: none"> - <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; - <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 - <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.
c.	The Land Use Recovery Plan (LURP)	Action 8	<p>Consistency is achieved with the following provisions:</p> <ul style="list-style-type: none"> - Providing for the development of greenfield priority areas that are not already zoned through rezoning as part of the DPR (Action 8, LURP); - Maintaining the role of existing industrial areas, zoned business, for Industrial activities (Action 24, LURP); - Providing for comprehensive developments in existing business areas including brownfield sites (Action 24, LURP); and - 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

			<p>areas as a part of the DPR (Action 24, LURP);</p> <ul style="list-style-type: none"> - Supporting an integrated approach to greenfield priority areas for business located near the airport; and - Establishing thresholds for commercial activities in greenfield priority areas to avoid reverse sensitivity effects or effects 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"> - encouraging the use of indigenous species in landscaping and planting; - protecting waahi tapu waahi taonga including springs; and - ensuring treatment of stormwater.

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 Park Zone on the corner of Memorial Avenue and Russley Road, 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:

	Title of report	Author	Date	Description of report
a.	Report – <i>Christchurch City District Plan Business Chapter Economic Analysis</i>	Property Economics Limited	March 2014	The report provides an evaluation of demand for industrial land against the current and future supply
b.	Document – <i>An Assessment on the Effectiveness of Existing Rules in the City Plan</i>	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 (Confidential)</i>	Canterbury Development Corporation	2012	Survey from May–June 2012 of 70 manufacturers in the worst affected suburbs of Bromley, Woolston and Phillipstown
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 Appendix 3 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 Canterbury 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 Canterbury 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 are required to enable repair and rebuilding activity
- h. Positive support needs to be provided for residential development of brownfield sites, by way of Discretionary activity status
- i. Question 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. There is a need to encourage 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.

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
Total:		553ha

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)¹;
 - 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

¹ 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 2011² 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 2000m² 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 (*Christchurch City District Plan Business Chapter Economic Analysis*, 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 relocate to other areas in Canterbury, the South Island or New Zealand.

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

³ Property Economics Ltd (November 2013), “*Christchurch City District Plan Business Chapter Economic Analysis*”, p54.

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”*.³
- 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 10,000m² 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 24,000m² per annum, representing nearly 60 per cent of all consented commercial floor space. In 2010 and 2011 the total floor space approved was 56,100m², 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

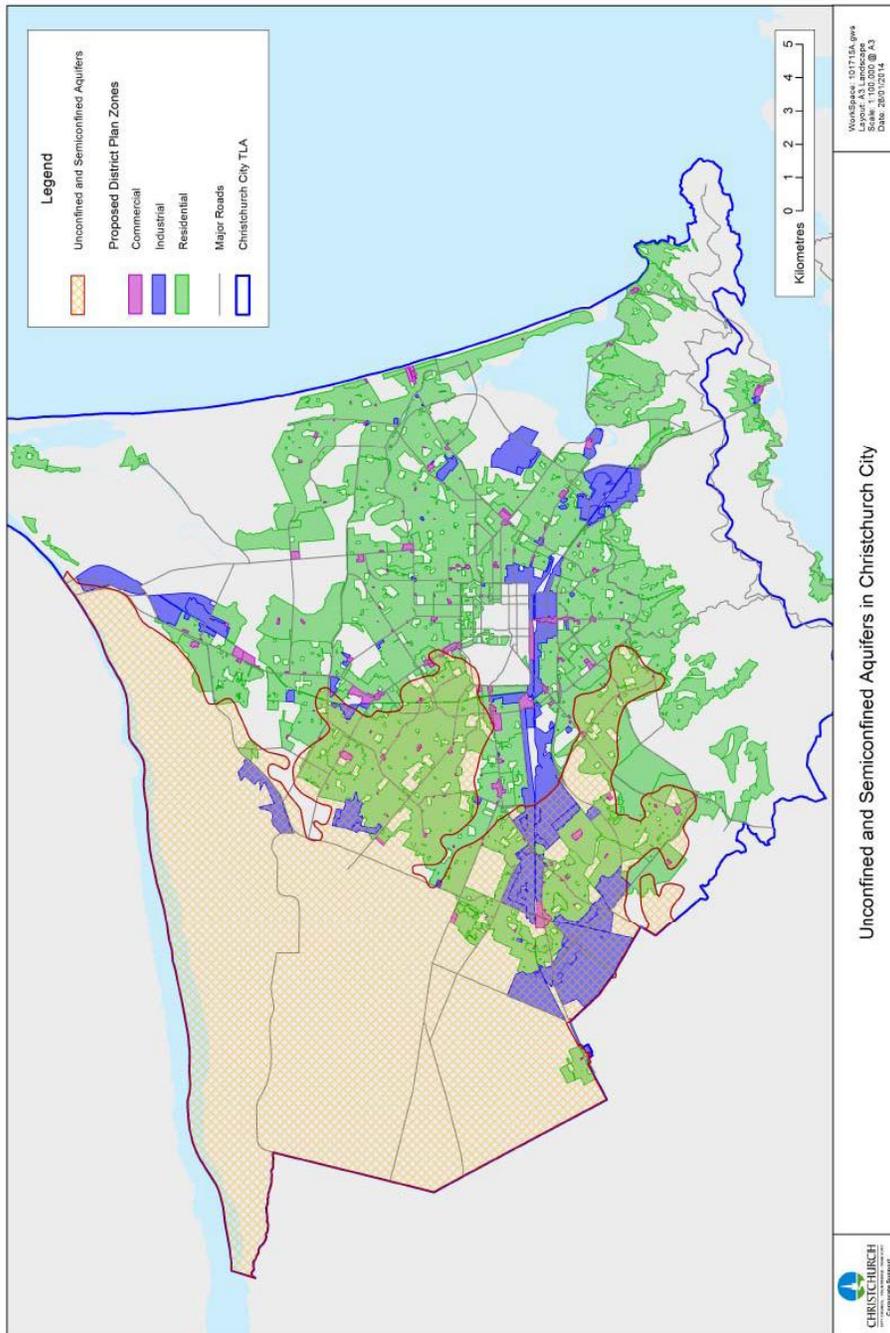
- 17. Having regard to the strategic context, a more restrictive approach is required to non-industrial activity in industrial zones providing a greater limit retail and office activities. Any options are therefore subtle variations.
- 18. This is a significant policy shift in the proposal from the current 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 2000m² 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.⁴ 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”*.⁵
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.

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

⁵ 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>Objective 1 (Option 1)</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"> 1. Ensuring that the demand for land can be met to accommodate future industrial growth and to support the recovery 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. 2. The potential of non-industrial activities to restrict opportunities for industrial activities to operate 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). 3. The potential traffic and employment implications resulting from a shift in industrial activity to the west of the City 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. 4. Poor amenity levels in existing industrial areas and the potential for conflict at the interface with other zones or land uses 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. <p>Option 1 (Proposed Objective 1) would (in the context of Part 2 matters):</p> <ol style="list-style-type: none"> 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; 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; c. contribute to the well-being of communities by supporting recovery of the city's industry in a way that facilitates growth;

	<ul style="list-style-type: none"> d. enable industrial areas to be efficiently served by infrastructure, with cost efficiencies for both industrial land developers and the wider community; e. enable business growth and recovery in existing and new industrial areas that provide opportunities for agglomeration and efficiencies in the market place; 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; 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; 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; 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; 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; 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); 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; 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 n. agglomeration of commercial activity in centres is promoted, which provides economic benefits to business through co-
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	location of suppliers/other businesses providing services, e.g. copy services.
<p>Option 2 (Status quo – existing City Plan ‘Role of Industrial Areas’)</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 RMA⁶ Option 2 could result in:</p> <ul style="list-style-type: none"> 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; 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; c. potentially affecting the growth and recovery of the Central City by <ul style="list-style-type: none"> i. decentralising jobs, particularly office jobs; 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 iii. eroding the role of centres as focal points and the appropriateness of areas surrounding centres for higher density housing; 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. e. could make industrial land less affordable, particularly for small business; f. a greater take-up of industrial zoned land for non-industrial purposes could lead to: <ul style="list-style-type: none"> - reverse sensitivity constraints on the operation of industrial

⁶ 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>Option 3 (Conservative approach – only permit industrial activities in industrial zones)</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> <ol style="list-style-type: none"> 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; 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; 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); 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); 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; f. reduce employee accessibility to amenities including shops and services for local employees including cafes and lunch bars; 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
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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>Option 1 (Proposed Objective 2) Managing effects</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"> 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. 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

<p>amenity, particularly the Industrial Park Zone on the corner of Memorial Avenue and Russley Road, 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>	<ol style="list-style-type: none"> 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"> 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; 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; c. promote amenity improvements that may contribute to business retention, attracting investment and providing a healthy working environment; 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 e. limit the potential adverse effects of development thereby helping to sustain the life-supporting capacity of natural resources. 4. The Objective also recognises highly prominent sites that are at gateways to the city in Russley and Belfast. In achieving the purpose of the Act, the proposed Objective would: <ol style="list-style-type: none"> a. enhance visual amenity at strategically important locations, contributing to the maintenance and enhancement of amenity values and the environment (s 7); and b. limit the potential adverse effects of development (s 5(2)(c) on physical resources including the environment of Memorial Avenue, a memorial to air service personnel who died during World War II. In protecting this resource, the cultural well-being of people and communities is provided for. 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.
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<p>Option 2 (Status quo – existing City Plan ‘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>	<p>Option 2 would maintain the operative District Plan Objective, ‘Amenity and Effects of Industrial Areas’.</p> <ol style="list-style-type: none"> 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. 2. However, it is considered that the wording of this Objective (i.e. “<i>A standard of amenity in industrial areas recognising their location and function</i>”) 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. 3. Additionally, the s 35 Report⁷ 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).
<p>Option 3 (Liberal approach of accepting a lower amenity in industrial areas)</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"> 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. 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"> 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; b. is likely to affect an industrial area’s ability to retain

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

	<p>some types of business wanting a high amenity environment to attract interest and investment, and provide a healthy working environment, and 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"> 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 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. <p>However, such an approach may also:</p> <ul style="list-style-type: none"> e. be more attractive to businesses that have adverse effects (e.g. odour, noise, traffic generation) and require separation from other activities; f. support greater utilisation of land by business to meet their needs, supporting economic growth and employment; and g. reduce costs for business of providing landscaping.
<p>Option 4 (Conservative approach of requiring a higher standard of amenity in industrial areas to make them attractive places to work)</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"> 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"> 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; 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; c. contributes to an area's attractiveness, providing employment opportunities and promoting economic recovery and growth;

	<ul style="list-style-type: none"> 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 road and adjoining zones (notwithstanding that the standard of amenity anticipated should reflect the function of industrial areas); 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 f. limits the potential adverse effects of development thereby helping to sustain the life-supporting capacity of natural resources.
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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>Relevant objective: Objective 1 ‘Recovery and Growth’ 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>POLICY 1 – Option 1 Maintain a sufficient supply of industrial land</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>Method Rezone land to meet anticipated demand while also providing choice in location.</p>	<p>Effectiveness</p> <ol style="list-style-type: none"> 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"> • <i>Ongoing industrial business relocations</i> • <i>Anticipated industrial growth (including the growth of sectors involved in recovery</i> • <i>A range of industrial activities spread over a wider geographic area.”</i> 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. 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.

	<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>Efficiency</p> <p>Benefits</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>Costs</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>
Options less or not as appropriate to achieve the objectives and policies:	
<p>POLICY 1 – Option 2</p> <p>Stage the release of land to align with demand.</p>	<p>Appropriateness</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>
Risk of acting or not acting	
<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.

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p>Relevant Objective: Objective 1 ‘Recovery and Growth’ 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>POLICY 2 – Option 1</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>Methods</p> <ul style="list-style-type: none"> - Permit development in existing industrial areas (i.e. without consenting costs). - Through engagement with stakeholders including landowners and industry, identify constraints to development and work with groups to overcome these. 	<p>Effectiveness</p> <ol style="list-style-type: none"> 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. 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. <p>Efficiency</p> <p>Benefits</p> <ol style="list-style-type: none"> a. Utilisation of existing resources including land and infrastructure is promoted. b. Employment opportunities are retained in the east. c. Jobs are accessible to the local labour force, supporting the well-being of people in that community. d. Contributes to the more efficient use of land, supporting consolidation within the existing urban area <p>Costs</p> <ol style="list-style-type: none"> e. Ongoing constraints may sterilise land that is no longer appropriate for industry.
Options less or not as appropriate to achieve the objectives and policies:	
<p>POLICY 2 – Option 2 Status Quo ‘Distribution of Industrial Activity’</p> <p>Encourage the efficient use of the industrial land resource</p>	<p>Appropriateness</p> <ol style="list-style-type: none"> 1. The current policy in the City Plan supports Objective 1 of supporting economic growth in existing industrial areas by encouraging the redevelopment. 2. The current policy pre-dates the earthquakes and therefore

<p>(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.</p>	
<p>Risk of acting or not acting</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 s32(4)(b)).</p>	

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>Relevant Objective: Objective 1 'Recovery and Growth' 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>POLICY 3 – Option 1</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>Methods: Zoning areas as Industrial General,</p>	<p>Effectiveness</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>Efficiency</p> <p>Benefits</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>Costs</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>Refer to section 5.0 for further evaluation of methods for zoning industrial areas.</p>

Industrial Heavy and Industrial Park.	
Options less or not as appropriate to achieve the objectives and policies:	
<p>POLICY 3 – Option 2 (Status quo)</p> <p>Policy: ‘Role of Industrial Areas’</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>Appropriateness</p> <ol style="list-style-type: none"> 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). 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.
Risk of acting or not acting	
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)).	

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

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p>Relevant Objective: Objective 1 ‘Recovery and Growth’ 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>POLICY 4 – Option 1 Activities in industrial zones</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"> i. are ancillary in scale and on the same site as a permitted activity; ii. are not appropriate in more sensitive environments due to their potential noise, odour or other environmental effects; iii. comprise yard based or trade suppliers in the Industrial General Zone; iv. provide an emergency service which may generate adverse effects; or v. support the needs of workers and businesses in the zone for food and beverages, commercial services, and the care of children. <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 Central City, District, and</p>	<p>Effectiveness</p> <ol style="list-style-type: none"> 1. 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. 2. As summarised earlier, Objectives 6.2.6(1) and (2) of Chapter 6 seek to ensure industrial areas are primarily for industrial activities. 3. 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. 4. Research undertaken to inform the Industrial chapter also supports a restrictive approach to retail and office activity in industrial zones. Property Economics⁸ 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 without compromising industrial activity development.

⁸ Property Economics (Oct 2013), “Christchurch City District Plan: Business Chapter Economic Analysis”.

Neighbourhood Centres as focal points for commercial, community, residential, and other activities.

Definitions

- 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

5. 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.

Efficiency Benefits

- a. Industrial zones are used primarily for industrial activities, supporting employment opportunities in industrial sectors, and economic growth.
- b. Supports the efficient use of resources by avoiding the use of land for non-industrial activities, which is intended for industrial activities.
- c. Ensures capacity to meet future demand for industrial activities.
- d. 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.
- e. Avoids inefficient use of resources that are otherwise used in travelling to retail and office activities in less accessible locations.
- f. Minimises effects from general traffic on the road network and the function of roads for the movement of freight.
- g. Avoids the potential for expectations of a higher amenity environment due to the presence of retail and office activities.
- h. 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.
- i. Provides for food and beverage outlets to serve the needs of workers and visitors in the area.
- j. 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.
- k. Provides for emergency service facilities and other non-industrial activities that may be inappropriate in other locations and that serve the community.
- l. Enables an assessment of uses that may be appropriate in industrial zones including pre-schools and commercial services e.g. copy centre.

Costs

	<p>m. Policy approach will result in additional costs for new commercial activities to locate in centres due to higher land values.</p> <p>n. Businesses that have relocated to industrial areas under the Order in Council have to relocate, resulting in additional costs to those businesses.</p> <p>o. 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>p. A larger number of consents are required if there is pressure for non-industrial development in industrial zones.</p> <p>6. Further analysis of the thresholds for retail and office development in the industrial zone is included in Appendix 3 (to follow).</p>
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Options less or not as appropriate to achieve the objectives and policies:

<p>POLICY 4 – Option 2 (Status quo)</p> <p>Retain existing policies.</p> <p>Range of Activities</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"> - 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 - the Central City and nine consolidation focal points to serve as effective centres around which to concentrate increased population densities. <p>Residential Activities</p>	<p>Appropriateness</p> <ol style="list-style-type: none"> 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. 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. 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. 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 referring to business activity, the policy provides for residential activity in association with a non-industrial activity, which could compromise the role of an area as an
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<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>POLICY 4 – Option 3 (Restrictive)</p> <p>No provision for non-industrial activities in industrial areas.</p>	<p>Appropriateness</p> <ol style="list-style-type: none"> 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. 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.
<p>Risk of acting or not acting</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>Relevant Objective: Objective 1 ‘Recovery and Growth’ 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>POLICY 5 – Option 1 Office development</p> <p>Avoid office development in industrial areas other than where it is:</p> <ol style="list-style-type: none"> a. ancillary to a permitted activity on the same site; b. located in the Industrial Park zone while supporting the function of the zone for primarily industrial activities seeking a park like environment. <p>Methods 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>Effectiveness</p> <ol style="list-style-type: none"> 1. The proposed policy and methods <ol style="list-style-type: none"> a. 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. b. are consistent with operative CRPS Objective 5.2.1, proposed CRPS Objective 6.2.5 and Policy 6.3.6. 2. 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. 3. 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. <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 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 m2 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>Efficiency</p> <p>Benefits</p> <ul style="list-style-type: none"> a. Ensures that industrial land is used for primarily industrial purposes. 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. 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. <p>Costs</p> <ul style="list-style-type: none"> d. Lost development potential value for landowners of sites where offices may have previously been a permitted activity. e. Less locational choice for prospective office developers and occupiers. f. Ongoing pressure for office development in industrial zones
Options less or not as appropriate to achieve the objectives and policies:	
<p>POLICY 5 – Option 2 (Restrictive) Office activity provided for but restricted to a lesser extent in industrial zones</p>	<p>Appropriateness</p> <ul style="list-style-type: none"> 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.
<p>Option 3 (Permissive) Provide for ‘offices associated with/ ancillary to an industrial activity without restrictions in terms of floorspace/ percentage of floor area.</p>	<p>Appropriateness</p> <ul style="list-style-type: none"> 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 the primary role of an industrial area.

Risk of acting or not acting
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%
Option 1 Proposed rule 25% or 250 m2 whichever is the lesser (e.g. Hamilton proposed plan)			
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%
Option 2 Auckland - General Business zone			
Less than or equal to 500m2	1973	2148	92%
<i>Variation on Auckland</i>			
Less than/ equal to 25% and less than/ equal to 500m2	1179	2148	55%
Option 3 Auckland - Light and heavy industrial zones			
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%
Less than/ equal to 30% and less than/ equal to 500m2	1340	2148	62%

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
Downers	671	1215	64.42

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

Occupant	Warehousing (sq m)	Office (sq m)	% of office to total
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>Relevant Objective: Objective 1 ‘Recovery and Growth’ 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>POLICY 5 – Option 1 Office Parks 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>Effectiveness</p> <ol style="list-style-type: none"> 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"> 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. 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. c. Property Economics⁹ 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. d. Is consistent with operative CRPS Objective 5.2.1, proposed CRPS Objective 6.2.5 and Policy 6.3.6. <p>Efficiency</p> <p>Benefits</p> <ol style="list-style-type: none"> e. Recognises and enables ongoing use and activity lawfully established and therefore gives certainty for existing

⁹ Property Economics (Oct 2013), “Christchurch City District Plan: Business Chapter Economic Analysis”.

	<p>landowners, occupiers and investors on the future use of their land.</p> <ul style="list-style-type: none"> f. Ensures that industrial land is used for primarily industrial purposes. g. No need for landowners to rely on existing use rights to retain their lawful status. h. Clear direction for prospective developers looking for office park zoning (e.g. “no more anticipated”). 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. 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. <p>Costs</p> <ul style="list-style-type: none"> k. Lost development potential value for landowners of sites where office park development may have previously been a permitted activity. l. Less locational choice for prospective office developers and occupiers. 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. n. Ongoing pressure for growth and expansion of office and ancillary activities in proposed office park areas.
Options less or not as appropriate to achieve the objectives and policies:	
<p>POLICY 6 – Option 2 Industrial zoning applied to existing office parks</p>	<p>Appropriateness</p> <ul style="list-style-type: none"> 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.
<p>Option 3 (Permissive) Offices limited in industrial areas but commercial rezoning of the three office parks.</p>	<p>Appropriateness</p> <ul style="list-style-type: none"> 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 Zone) either as a new centre (William Pickering Drive) or

	<p>extension to an existing centre (e.g. Addington/Show Place).</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>Risk of acting or not acting</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>Relevant Objective: Objective 1 'Recovery and Growth' 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>POLICY 7 – Option 1 Brownfield redevelopment</p> <p>To support the redevelopment of brownfield sites for residential or mixed use activities where:</p> <p>a. 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.</p> <p>b. The residential or mixed use development would not hinder the establishment or ongoing operation of surrounding industrial activities.</p> <p>c. The anticipated amenity values of the adjoining industrial zone are not compromised.</p> <p>d. The safety and efficiency of the current and future transport system is not significantly adversely affected.</p> <p>e. A high level of residential amenity can be achieved on the site.</p> <p>f. There is good walking and cycling access to public transport routes, commercial and community services, and open space.</p> <p>g. If necessary, contaminated land is remediated in accordance with national and regional standards.</p> <p>h. 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.</p>	<p>Effectiveness</p> <p>a. 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.</p> <p>b. 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.</p> <p>Efficiency</p> <p>Benefits</p> <p>c. Supports the efficient use of land by enabling the redevelopment of under-utilised sites.</p> <p>d. Provides opportunities for residential development in close proximity to work, encouraging shorter journeys and walking and cycling.</p> <p>Costs</p> <p>e. Potential costs for developers of a consenting process and requirements to be met in criteria.</p> <p>f. 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.</p>

Options less or not as appropriate to achieve the objectives and policies:	
<p>POLICY 7 – Option 2</p> <p>Limit brownfield opportunities to suitable sites identified in the District Plan.</p>	<p>APPROPRIATENESS</p> <ol style="list-style-type: none"> 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). 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.
<p>POLICY 7 – Option 3 (Permissive)</p> <p>Enable the redevelopment or use of brownfield sites (permissive).</p>	<p>APPROPRIATENESS</p> <ol style="list-style-type: none"> 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.
Risk of acting or not acting	
<ol style="list-style-type: none"> 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)). 	

4.7 POLICY 8 ‘IMPROVE VISUAL AMENITY’ AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p>Relevant objective(s): Objective 2 ‘Amenity in Industrial Zones and the effects of Industrial Activities’ 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 Park Zone on the corner of Memorial Avenue and Russley Road, 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>POLICY 8 – Option 1 Improve visual amenity</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. Maintain and enhance the amenity values of Memorial Avenue and its function as a war memorial and visitor gateway through well designed buildings, limited signage and significant setbacks and landscaping.</p> <p>d. 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</p>	<p>Effectiveness</p> <p>The proposed policy approach of improvements to visual amenity along road frontages, at the interface with more sensitive zones and on visually prominent sites supports Objective 2 of achieving (a) an appropriate level of amenity and effects for areas interfacing with industrial areas and (b) a high level of visual amenity along road boundaries (street scene).</p> <p>The policy approach and rules recognise that the interface with public space and more sensitive zones is the most important across all zones, supporting Objective 2(b).</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.</p> <p>Efficiency Benefits</p> <p>a. Provides for environmental benefits by supporting improvements to visual amenity at the interface with the road environment and more sensitive zones.</p> <p>b. Contributes to the enhancement of city-wide amenity.</p> <p>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.</p>

<p>General Zone (North Belfast).</p>	<ul style="list-style-type: none"> d. Tree planting and landscaping has wider environmental benefits beyond screening, e.g. carbon sink/mitigates noise, heat and dust/biodiversity. 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). 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. g. Policy approach will not prevent high levels of development or the utilisation of space for companies to establish and operate. <p>Costs</p> <ul style="list-style-type: none"> h. Requirements for landscaping and buildings to be setback or restricted in scale results in additional costs for developers or landowners. 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. j. Limitations on fencing at the boundary with a road boundary or adjoining Open Space, Rural, Cultural or Conservation may compromise the security of a business and its resources by making areas more visible and accessible than is sought.
<p>Options less or not as appropriate to achieve the objectives and policies:</p>	
<p>Policy 8 – Option 2 (Status quo)</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>Appropriateness</p> <ol style="list-style-type: none"> 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. 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.

	<p>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.</p>
<p>Option 3 (Liberal)</p> <p>Reduced requirements for landscaping or setbacks in recognition of the functional requirements of industrial activities.</p>	<p>Appropriateness</p> <p>1. This option would not support either tenet of proposed Objective 2.</p> <p>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).</p>
<p>Risk of acting or not acting</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>	

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

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p>Relevant objective(s): Objective 2 ‘Amenity in Industrial Zones and the effects of Industrial Activities’ 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 Park Zone on the corner of Memorial Avenue and Russley Road, 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>	
Provision(s) most appropriate	Effectiveness and efficiency
<p>POLICY 9 – Option 1 Development in greenfield areas 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. 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>Effectiveness</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>Efficiency Benefits</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</p>

	<p>indigenous species in planting and landscaping.</p> <p>h. Provides a higher amenity environment for business and employees.</p> <p>Costs</p> <p>i. Requirements for landscaping and buildings to be setback or restricted in scale results in additional costs for developers and landowners.</p>
Options less or not as appropriate to achieve the objectives and policies:	
<p>Option 2 Apply general provisions to greenfield areas</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>Option 3 Provide for a level of amenity in greenfield areas akin to residential areas</p>	<p>Appropriateness</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>
Risk of acting or not acting	
<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

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p>Relevant objective(s): Objective 2 ‘Amenity in Industrial Zones and the effects of Industrial Activities’ 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 Park Zone on the corner of Memorial Avenue and Russley Road, 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>	
Provision(s) most appropriate	Effectiveness and efficiency
<p>POLICY 10 – Option 1 Managing effects on the environment 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 semiconfined aquifers is restricted to</p>	<p>Effectiveness</p> <ol style="list-style-type: none"> The policy of limiting the scale and form of development at the interface with more sensitive zones supports Objective 2(a) of ensuring that the level of amenity anticipated in the adjoining zone is not compromised by industry. <p>Efficiency Benefits</p> <ol style="list-style-type: none"> 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. 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. 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. Removal of a maximum plot ratio rule in the General Industrial and Industrial Park Zone, except on sites adjoining a residential

<p>minimise any risk of 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>Costs</p> <ul style="list-style-type: none"> e. 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. f. 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. g. Restrictions on the scale and form of development results in a lower yield for an industrial landowner or developer.
<p>Options less or not as appropriate to achieve the Objectives and policies:</p>	

<p>POLICY 10 – Option 2 (Status quo)</p> <p>Status quo – retain existing provisions</p>	<p>Appropriateness</p> <p>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.</p>
<p>POLICY 10 – Option 3 (Liberal)</p> <p>Provide for a greater scale or form of development across industrial areas</p>	<p>Appropriateness</p> <p>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.</p> <p>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.</p>
<p>Risk of acting or not acting</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>	

4.10 POLICY 11 'MANAGING STORMWATER' AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
<p>Relevant objective(s): Objective 2 'Amenity in Industrial Zones and the effects of Industrial Activities'</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 amenity, particularly the Industrial Park Zone on the corner of Memorial Avenue and Russley Road, 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>POLICY 11 – Option 1 Managing stormwater</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>Effectiveness</p> <ol style="list-style-type: none"> 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. 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. <p>Efficiency Benefits</p> <ol style="list-style-type: none"> a. Contributes to the enhancement of city-wide amenity. b. Enhances amenity and landscape values with the establishment of swales, retention and infiltration basins. c. Provides opportunities for recreation and open space. d. Cultural values can be recognised through the use of indigenous

<p>f. utilises native species within swales, basins and wetlands, where appropriate, recognising their ability to absorb water and filter waste.</p> <p>Methods Resource consent required for any surface water management structure within 3km of the runways of Christchurch International Airport Limited</p> <p>Definitions Bird strike Surface Water Management Structure</p>	<p>e. Avoids the risk of stormwater contaminating waterways and provides for higher standards of water quality.</p> <p>f. Reduces the risk of flooding on a catchment basis.</p> <p>g. Provides for efficiencies in managing stormwater across a catchment rather than individual site basis.</p> <p>h. Gives effect to resource consents the Council holds for stormwater management across the Styx and upper Heathcote catchments.</p> <p>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.</p> <p>Costs</p> <p>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.</p> <p>k. Some methods provide savings, e.g. rainwater harvesting.</p> <p>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.</p>
Options less or not as appropriate to achieve the objectives and policies:	
<p>Option 2 Provide for a range of solutions to stormwater management including piped infrastructure</p>	<p>Appropriateness</p> <p>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.</p>
<p>Option 3 Status Quo – Retention of existing rules for greenfield areas to manage birdstrike risk from waterbodies</p>	<p>Appropriateness</p> <p>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.</p>
Risk of ACTING OR NOT ACTING	
<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>	
Relevant Objective	
Objective 1: Recovery and growth	
Provision(s) most appropriate	Effectiveness and efficiency
Option 1. Introduce a new zone framework	Effectiveness Efficiency Benefits <ol style="list-style-type: none"> 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. 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. 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. 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

	<p>zoned land, and provide for a wide number of business activities.</p> <p>Costs</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>
Options less or not as appropriate to achieve the objectives and policies:	
<p>Option 2 (Status quo) Maintain Status quo – existing zone structure</p>	<p>Appropriateness</p> <p>Benefits</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>

	<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.</p> <p>3. <i>Economic</i> 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.</p> <p>Costs</p> <p>4. <i>Environmental</i> 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.</p> <p>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.</p> <p>6. <i>Social and cultural</i> 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>
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	<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>Option 3 Single zone for all areas, providing for a range of business activities</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>Appropriateness</p> <p>Benefits</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>Costs</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>
Risk of acting or not acting	
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>RECOMMENDED APPROACH:</p> <ol style="list-style-type: none"> 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. 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. 	

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 INDUSTRIAL PARK ZONE (MEMORIAL AVENUE)

Summary of Transport Assessment

Giving effect to LURP Action 24

2. In accordance with *LURP Action 24: Christchurch City Council District Plan Review*, a high level assessment of transport effects of proposed land use changes in greenfield priority areas located near Christchurch Airport has been undertaken. The assessment evaluates the future transport needs and the cumulative traffic impacts of rezoning the Industrial Park Zone (Memorial Avenue) site in association with potential widening of a range of uses within the Special Purpose (Airport) Zone and rezoning of the North West Review Area (NWRA) sites.
3. A range of potential development scenarios for the wider area were tested using strategic transport modelling techniques with development of the Industrial Park Zone (Memorial Avenue) site included within each scenario. In focusing on the effects of the rezoning of the site, it can be inferred from the modelling that the immediate surrounding road network, accompanied by appropriate intersection design, has the potential to accommodate the future trip generation anticipated for an industrial park zoning of the site.
4. Analysis of the wider area indicates that as an urban fringe location, public transport accessibility is relatively poor. Modelling indicates that accessibility is likely to remain at similar levels to existing for all future scenarios, assuming a bus-based public transport system similar to that currently in operation is maintained in the future. Analysis also indicates that overall transport-mode split is dominated by private vehicles (approximately 97 per cent of daily trips by car) and that this is likely to remain relatively constant.
5. Analysis also suggests that development within the wider area should integrate as much as possible with existing footpaths, cycleways and public transport stops, although, given the remote location of the area, this alone will not significantly increase accessibility for these modes.
6. From a sustainability perspective, the analysis identifies the benefits of locating freight-related activities in the area given its peripheral location and proximity to the strategic road network and the national significance of the Christchurch International Airport. Conversely, the analysis recommends that efficiency, environmental and social costs of increased travel by private vehicles are minimised by limiting office-related development at this urban fringe location.

Provisions for managing interface with Memorial Avenue

- a. requirement for consent for any new buildings or additions to buildings within 50m of Memorial Avenue;

- b. setback from Memorial Avenue for buildings up to 12m in height- 20m;
- c. setback from Memorial Avenue for buildings used for Guest accommodation between 12m and 20min height 50m;
- d. setback from Avonhead Road 15m;
- e. setback from Russley Road 10m;
- f. landscaping within setbacks; and
- g. limits on the number, size and location of signs.

Provision(s) most appropriate	Effectiveness and efficiency
Visual amenity of development on sites adjoining Memorial Avenue (building setbacks, design of buildings and signage controls)	
<p>Option 1 Proposed rules</p> <ol style="list-style-type: none"> 1. Provide for the standard Industrial Park Zone six metre setback from all road boundaries, with a reduced 1.5 metre setback for one boundary on corner sites, and 1.5 metres for ancillary offices. <p>However, greater setbacks from Memorial Avenue are proposed:</p> <ol style="list-style-type: none"> a. a 20m setback for any activity on a site adjacent to Memorial Avenue, except that; b. a 50m setback shall apply to buildings located along Memorial Avenue, and which are between 12m and 20m in height. <ol style="list-style-type: none"> 2. Erection of any new buildings and additions to existing buildings on sites within 50m of Memorial Avenue trigger consents and require a design and amenity assessment. 3. Provision is made for a hotel with a maximum of 200 rooms and up to 20m in height within a specified area of the zone (hatched area on the ODP). 4. Restrictions are placed on the number, type and size of 	<p>Effectiveness</p> <ol style="list-style-type: none"> 1. The standard six and 1.5m setbacks are consistent with the provisions for all other Industrial Park Zones and Objective 2 by promoting offices at street frontage and limiting adverse effects on the adjoining sites and zones. 2. The increased setbacks from Memorial Avenue have a two-fold purpose. Firstly, in keeping with the character of that road, its memorial and gateway functions, the setbacks allow for enhance landscaping, including space for large-scale trees. Extensive planting for the purposes of screening buildings that do not have active frontages facing Memorial Avenue would also be enabled. 3. Secondly, the setbacks combined with a reduced building height should ensure the appearance and amenity of the Memorial/Russley overbridge arches, symbolising the Port Hills and the Alps, are not adversely affected. 4. The ability to achieve the outcomes sought by Objective 2 would further strengthened by the required design and amenity assessment for all new buildings or additions to buildings. 5. Provision for guest accommodation of up to 200 rooms and up to 20m in height within the zone provides an opportunity to create a landmark building, which could add to the interest and amenity of this important gateway site. 6. Provision for a hotel on the site is consistent with Policy 4 by allowing a non-industrial activity in this Industrial Park area, which may support the functions of industrial activities within the zone and of the nearby airport. <p>Efficiency</p> <p>Benefits</p> <ol style="list-style-type: none"> a. The 20m setbacks would allow for extensive landscaping and planting of large specimen trees in keeping with the current

<p>signage along Memorial Avenue:</p> <ul style="list-style-type: none"> a. no more than two double sided directional only signs within the 20m setback from Memorial Avenue; b. a 10m² maximum area per side of each sign; c. maximum 10m sign height and five metre width; d. signs to be located at least 10m away from a vehicle access point; and a. illumination by lights directed on the sign only. 	<ul style="list-style-type: none"> b. Larger setback would provide sufficient space for additional screening of buildings through dense planting. c. The increased setbacks between industrial activities on the site and residential areas across the road would help maintain the sense of separation and enhance visual amenity. d. Locating taller buildings further away from the Memorial Avenue frontage would ensure that the prominence of the gateway bridge sculpture is not compromised by visual intrusion of such buildings; e. The role of Memorial Avenue as a war memorial and an important gateway to Christchurch would be protected and enhanced through well-designed buildings of a scale appropriate to its context. <p>Costs</p> <ul style="list-style-type: none"> f. Less flexibility in development location choices. g. A hotel development may be less visible to potential customers from Memorial Avenue. <ul style="list-style-type: none"> a. Potential added costs associated with enhanced landscaping requirements.
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Options less or not as appropriate to achieve the objectives and policies:

<p>Option 2 <i>Status quo</i> <i>Retain the existing provisions which distinguish between different Industrial Park zoned areas and either add Memorial Avenue Industrial Park Zone to one of the sets of rules or duplicate some of these for the Memorial Avenue site.</i></p> <p>Current rules for Business 4T zones require the following setbacks:</p> <p>For B4T (Sir William Pickering) – on boundaries with a living zone 5m on the western boundary of the zone; 13.5m on all other boundaries with living zones; 15m setback from road boundaries except for: 3m setback for service station canopies and 1.5m for one road on corner sites; and 5m setback from internal boundaries.</p> <p>For B4T (Tait Campus) –</p>	<p>Appropriateness</p> <p>This option would be difficult to apply to the Industrial Park Zone (Memorial Avenue) as the existing rules were created for two specific sites with their unique circumstances not necessarily appropriate or applicable to the proposed Memorial Avenue Zone.</p> <p>Effectiveness</p> <p>Applying the setback rules from either the Sir William Pickering Drive or the Tait Campus Business 4T Zone could result in insufficient or excessive setbacks from Memorial Avenue. The applied rules would not take into account the site-specific circumstances such as the scale of development and amenity of the area, the importance of the gateway function of Memorial Avenue or the bridge art. The result may lead to undesirable or poor outcomes.</p> <p>Efficiency</p> <p>Benefits</p> <p>Potentially fewer constraints on development therefore promoting economic growth. Reduced costs of compliance if no consents required for taller buildings in close proximity to Memorial Avenue or in the sight lines of the overbridge arches.</p> <p>Costs</p> <p>Undesirable visual impact on the gateway art of the Memorial/Russell overbridge. May lead to poor amenity outcomes along Memorial Avenue, e.g. out-of-context bulky buildings too close to the road boundary.</p>
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<p>20m setback from Wooldridge Road and Stanleys Road boundaries; and 15m from internal boundaries (with Rural 5 Zone).</p>	<p>Would not provide incentives for ancillary offices to be placed within setbacks to improve the street amenity. Potential adverse effects on the amenity of the nearby residential areas along Memorial Avenue.</p> <p>A number of resource consents for breaches of inappropriate rules could be triggered.</p>
<p>Option 3 <i>No setback or a reduced setback from Memorial Avenue</i></p>	<p>Appropriateness</p> <p>1. This option may result in adverse effects on the street environment (street frontage dominated by bulky buildings) and outlook and amenity of those across the street from the site. The quality of the important gateway to Christchurch could be compromised.</p> <p>Effectiveness</p> <p>2. Reduced or no setbacks from road frontages may lead to industrial buildings dominating the street and the immediately adjoining environment. This could result in reduced amenity of this important gateway site, which would be inconsistent with Objective 2 and Policy 2.</p> <p>Efficiency</p> <p>Benefits</p> <ul style="list-style-type: none"> a. Reduced number of consents for development. b. More efficient use of sites supporting economic growth. <p>Costs</p> <ul style="list-style-type: none"> c. Potential adverse effects due to visual dominance of buildings and overshadowing the street. <p>Building close to Memorial Avenue may appear out of scale, dominate the leafy avenue outlook and compromise the visual effect of the Russley/Memorial overbridge art.</p>
<p>Risk of acting or not acting 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 Russley Road, Avonhead Road and sensitive uses along the eastern boundary of the zone

- a. requirement for consent for any new buildings or additions to buildings within 50m of Avonhead Road and Russley Road;
- b. setback from Avonhead Road 15m;
- c. setback from Russley Road 10m; and
- d. landscaping within setbacks.

Provision(s) most appropriate	Effectiveness and efficiency
Visual amenity of development on the interface with other boundaries (Russley Road, Avonhead Road and internal boundary with the Living 5 – Commodore Hotel site)	
<p>Option 1 Proposed rules Provide for the standard Industrial Park Zone six metre setback from all road boundaries, with a reduced 1.5m setback for one boundary on corner sites, 1.5m for ancillary offices, and 3m for service station canopies.</p> <p>However, greater setbacks are required from Russley Road, Avonhead Road and eastern site boundary with the Commodore Hotel site (Living 5 Zone):</p> <ul style="list-style-type: none"> b. 10m setback for any activity on sites adjacent to Russley Road; c. 15m setback for any activity on sites adjacent to Avonhead Road; d. 20m setback for any activity on sites adjacent to the Eastern boundary of the zone. 	<p>Effectiveness</p> <ol style="list-style-type: none"> 1. The standard six metre and 1.5m setbacks are consistent with the provisions for all other Industrial Park Zones and Objectives by promoting offices at street frontage and limiting adverse effects on the adjoining sites and zones. 2. Residents in the suburb of Avonhead have expressed concern about the effects of an industrial development on the amenity of their residential area. The potential adverse visual effects would be mitigated by an increased setback for buildings along Avonhead Road and the added requirement for half of that setback to be landscaped. 3. A 10m setback from Russley Road would help mitigate any adverse visual and noise effects of Russley Road (SH1) and the overhead bridge traffic on the development within the Industrial Park Zone. Conversely, such landscaped setback would help screen any unsightly buildings from SH1 travellers 4. The potential adverse effects of industrial development on the adjacent sensitive zone (Commodore Hotel complex) would be mitigated by the requirement for a 15m landscaped setback from the eastern boundary of the zone. The distance and planting buffer would help screen potentially unattractive buildings, mitigate potential noise effects and help maintain amenity along that zone interface. <p>Efficiency</p> <p>Benefits</p> <ul style="list-style-type: none"> b. The setbacks will allow for extensive landscaping. c. Screening provided by landscaping would help mitigate adverse noise effects. d. The increased setbacks between the sensitive Guest Accommodation Zone and industrial areas would help maintain the sense of separation and enhance visual amenity. <p>Costs</p> <ul style="list-style-type: none"> e. Less flexibility in development location choice.

	f. Potential added costs associated with additional landscaping.
Options less or not as appropriate to achieve the objectives and policies:	
<p>Option 2 Status quo Retain the distinction between different areas. The difficulty is that the existing provisions relate to specific sites and environments that are not necessarily applicable to the Memorial Avenue Zone.</p> <p>Current rules for Business 4T zones require: For B4T (Sir William Pickering) – on boundaries with a living zone</p> <ul style="list-style-type: none"> - 5m on the western boundary of the zone; - 13.5m on all other boundaries with living zones; - 15m setback from road boundaries except for: <ul style="list-style-type: none"> o 3m setback for service station canopies and 1.5m for one road on corner sites; and - 5m setback from internal boundaries. <p>For B4T (Tait Campus) –</p> <ul style="list-style-type: none"> - 20m setback from Wooldridge Road and Stanleys Road boundaries; and - 15m from internal boundaries with Rural 5 Zone. 	<p>Appropriateness</p> <ol style="list-style-type: none"> 1. This option would be difficult to apply to the Industrial Park Zone (Memorial Avenue) as the existing rules were created for two specific sites with their unique circumstances not necessarily applicable to the proposed Memorial Avenue zone. <p>Effectiveness</p> <ol style="list-style-type: none"> 2. Applying the setback rules from either Sir William Pickering Drive or Tait Campus Business 4T Zone could result in insufficient or excessive setbacks from Avonhead Road, Russley Road, or from the boundary with the neighbouring sensitive zone to the east. The applied rules would not take into account the site-specific circumstances, such as the need to protect the amenity of the adjacent sensitive zones or the impact of the Russley Road traffic noise on the site. The result could be undesirable or poor outcomes. <p>Efficiency</p> <p>Benefits</p> <ol style="list-style-type: none"> a. Fewer constraints on development therefore promoting economic growth. <p>Costs</p> <ol style="list-style-type: none"> b. Undesirable visual and amenity impacts on the adjacent sensitive zones. c. May lead to poor amenity outcomes along Avonhead and Russley Roads or the eastern boundary of the zone, e.g. out-of-context bulky buildings too close to the boundaries. d. Would not provide incentives for ancillary offices to be placed within setbacks to improve the street amenity. e. Potential adverse effects on the character of adjacent residential and sensitive areas.
<p>Option 3 No setback or a reduced setback</p>	<p>Appropriateness</p> <ol style="list-style-type: none"> 1. This option may result in adverse effects on the street environment and outlook and amenity of those in the adjacent sensitive zones as well as visitors to the area. <p>Effectiveness</p> <ol style="list-style-type: none"> 2. Reduced or no setbacks from road frontages or sensitive zone may lead to industrial buildings dominating the street and the immediately adjoining zones. This could result in reduced

	<p>amenity of the surrounding environment, which would be inconsistent with Objective 2.</p> <p>Efficiency</p> <p>Benefits</p> <ol style="list-style-type: none"> Reduced number of consents for development. More efficient use of sites supporting economic growth. <p>Costs</p> <ol style="list-style-type: none"> Potentially adverse effects due to visual dominance of building and overshadowing the street. Buildings close to Avonhead or Russley Roads may appear out of scale and compromise the character of the adjacent residential areas. Loss of pleasant open space or rural outlook for the residents and hotel visitors and excessive reduction in the amenity of the area.
Risk of acting or not acting	
<p>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)).</p>	

Height limits

- Height limit for buildings used for Guest Accommodation within the area defined as “Guest Accommodation restricted to this area” on the ODP and set back 50 metres from Memorial Avenue- 20 metres
- Height for all buildings within 50 metres of Memorial Avenue- 12 metres
- Height limit for all other areas 15 metres

Provision(s) most appropriate	Effectiveness and efficiency
Maximum Height of Buildings	
<p>Option 1 <i>Proposed rules</i> <i>Control height across the zone with a maximum height of 15m (standard for the proposed Industrial Park Zone) except that:</i></p> <ol style="list-style-type: none"> <i>Buildings for Guest accommodation building /s can be up to 20m high provided that:</i> <i>buildings over 12m in height are set back a minimum of 50m from Memorial Avenue; and</i> <i>located within an area to which guest accommodation is limited as defined on the ODP.</i> 	<p>Effectiveness</p> <ol style="list-style-type: none"> The 15m height limit for buildings is consistent with the provisions for all other industrial zones and supports Objective 2 by limiting adverse effects on adjoining sites and zones. Hotel buildings tend to be multi-storey to maximise the efficiency in the use of space and services. The 20m height limit for guest accommodation allows for a more efficient hotel development while providing an opportunity to create a landmark building that could add to the amenity of this important gateway site. Having particular regard to the adverse effects a taller building would have on the visual amenity of the future bridge art of Russley Road/Memorial Avenue SH1 overbridge, a 50m building

<p>Current Business 4T Zone rules have no building height limit other than recession planes applicable to boundaries with sensitive zones. However, for Business 4T (Tait Campus) Zone the height limit is 15m except that within 50m of the road boundary with Stanleys Road and Wooldridge Road that limit is lowered to 11m.</p>	<ol style="list-style-type: none"> 4. An assessment of visual effects of 12m, 15m and 20m high buildings on the overbridge has been undertaken and indicates that buildings over 12m in height and set back 20m from Memorial Avenue (standard setback from Memorial Avenue at the site) would be highly visible through the bridge arches on the approach from the airport into the city. This would have detrimental effects on the appearance of the arches, which symbolise the Port Hills and the Alps, and will mark the Memorial Avenue gateway to Christchurch (as viewed from the airport side). 5. Such effect can be mitigated by requiring that any buildings over 12m in height and located in the hatched area of the ODP including guest accommodation buildings up to 20m in height be set back 50m from Memorial Avenue and remain clear of the bridge art site lines. <p>Efficiency</p> <p>Benefits</p> <ol style="list-style-type: none"> a. A maximum 20m building height for guest accommodation in this zone provides for an economically viable multi-storey hotel development. b. A well-designed hotel building may contribute to the amenity of the area. c. The 50m setback for buildings over 12m in height in the hatched area of the ODP would ensure these are less visible from Memorial Avenue and further protect the amenity of the memorial road and the gateway. <p>Costs</p> <ol style="list-style-type: none"> d. A hotel development may be less visible to potential customers from Memorial Avenue. e. Less flexibility in location choice.
<p>Options less or not as appropriate to achieve the objectives and policies:</p>	
<p>Option 2 <i>Status quo</i> <i>Remove the height limits and control the scale of buildings through maximum site coverage and recession planes (Status quo for Business 4T Zone with control of the scale of development through the maximum 25 per cent or 35 per cent site coverage by buildings).</i></p>	<p>Appropriateness</p> <ol style="list-style-type: none"> 1. This option would control the scale of development by means of a maximum 25 per cent site coverage (or 35 per cent for Tait Campus) and recession planes on the boundaries with sensitive zones rather than height. <p>Effectiveness</p> <ol style="list-style-type: none"> 2. Control by site coverage only (where the site is not directly adjoining a sensitive zone) could result in taller buildings, out of context with the surrounding area. Such development may

	<p>adversely affect the memorial and gateway function of Memorial Avenue, including the adverse visual effects on the Memorial/Russley overbridge art.</p> <p>3. While control of height by recession planes on the boundaries with a sensitive zone may prevent shading of the immediate neighbours, it would not be effective in mitigating the visual effects of development out of scale with the surrounding environment (the deeper into the site, the taller the buildings may become), residential areas in particular.</p> <p>Efficiency</p> <p>Benefits</p> <ul style="list-style-type: none"> a. Fewer constraints on development therefore promoting economic growth. b. More efficient use of the site. c. Reduced costs of compliance as no consents required for taller buildings where recession planes do not apply. <p>Costs</p> <ul style="list-style-type: none"> d. Controls on site coverage by buildings without height limits may have detrimental impact on the outlook of adjoining areas. e. May lead to poor outcomes such as buildings out of scale with their surroundings, e.g. visual impact on the gateway art of the Memorial/Russley overbridge. f. Adverse effects on the character of Memorial Avenue, i.e. leaving the avenue with smaller scale, predominantly residential buildings.
<p>Option 3 <i>Manage the height by imposing limits only on sites directly adjoining a more sensitive zone and within a 50m strip along the Memorial Avenue frontage.</i></p>	<p>Appropriateness</p> <ul style="list-style-type: none"> 1. This option would only limit the height on sites adjoining a more sensitive zone and within 50m metres of Memorial Avenue. <p>Effectiveness</p> <ul style="list-style-type: none"> 2. A height limit on sites adjoining a more sensitive zone would limit adverse effects of industrial buildings on the immediate adjoining areas to some extent, supporting Objective 2. However, on narrower or smaller sites adjoining or across the road from sensitive zones, tall industrial buildings further away from the zone boundary may still have impacts on the outlook of the surrounding areas, residential properties in particular. 3. This zone is adjacent to an existing sensitive zone (Living 5) and faces residential and small scale rural lifestyle properties across the roads. No controls would apply to Industrial Park sites across the road from sensitive zones, which could potentially result in buildings out of scale with the surrounding residential development and adverse effects on the amenity of the

	<p>surrounding area.</p> <p>Efficiency</p> <p>Benefits</p> <ol style="list-style-type: none"> Fewer constraints on development and more efficient use of the site therefore promoting economic growth. Reduced costs of compliance as no consents required for taller buildings where height limits or recession planes do not apply <p>Costs</p> <ol style="list-style-type: none"> Detrimental effects on the amenity and outlook of the nearby residential/rural residential area. Poor outcomes, i.e. development out of scale and context with residential development. Despite the height limits on buildings within 50m of Memoria Avenue, taller buildings beyond the setback may still appear out of scale and dominate the memorial avenue and gateway outlook.
Risk of acting or not acting	
<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>	

6.2 GENERAL INDUSTRIAL ZONE (NORTH BELFAST)

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

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

Provision(s) most appropriate	Effectiveness and Efficiency
<p>Option 1 Provisions for setbacks, landscaping and requirement for consent to assess design and amenity of buildings adjoining Main North Road/Northern Arterial.</p>	<p>Effectiveness</p> <ol style="list-style-type: none"> 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. 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. <p>Efficiency</p>

	<p>Benefits</p> <ul style="list-style-type: none"> a. Enhances the visual amenity at the interface with rural zones and at the gateway to the city. b. Maintains the character of the adjoining rural zones with a clear delineation between urban and rural development. c. Minimises the impacts of industrial buildings on outlook. d. Potential for increased investment. <p>Costs</p> <ul style="list-style-type: none"> e. Increased costs associated with land being set aside for setbacks and landscaping.
Options less or not as appropriate to achieve the objectives and policies:	
<p>Option 2 Status quo General set back of six metres</p>	<p>Appropriateness</p> <ul style="list-style-type: none"> 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 industrial buildings being in close proximity to boundaries with key corridors. It would therefore not support Objective 2 of ensuring a higher level of amenity at highly prominent locations.
Risk of acting or not acting	
<ul style="list-style-type: none"> 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

Provision(s) most appropriate	Effectiveness and Efficiency
<p>Option 1 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>Effectiveness</p> <ul style="list-style-type: none"> 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. 2. It also supports Objective 2 of the Industrial chapter in avoiding adverse effects on the environment of industrial activities. <p>Efficiency</p> <p>Benefits</p> <ul style="list-style-type: none"> a. Protects waahi tapu and preserves values for future generations. 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. <p>Costs</p> <ul style="list-style-type: none"> c. Additional consenting and compliance costs unless dealt with

7.0 APPENDICES

APPENDIX 1 Key Strategic Documents

(a) Canterbury Regional Policy Statement

Chapter 5 Objective 5.2.1- Location, design and function of development (Entire Region)

Development is located and designed so that it functions in a way that:

1. *achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth; and*
2. *enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which:*
 - a) *maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values;*
 - b) *provides sufficient housing choice to meet the region's housing needs;*
 - c) *encourages sustainable economic development by enabling business activities in appropriate locations;*
 - d) *minimises energy use and/or improves energy efficiency;*
 - e) *enables rural activities that support the rural environment including primary production;*
 - f) *is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure;*
 - g) *avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure;*
 - h) *facilitates the establishment of papakâinga and marae; and*
 - i) *avoids conflicts between incompatible activities.*

Chapter 6 –

Objective 6.2.6 - Business Land Development

Identify and provide for Greater Christchurch's land requirements for the recovery and growth of business activities in a manner that supports the settlement pattern brought about by Objective 6.2.2, recognising that:

1. *The greenfield business priority areas in Christchurch City provide for the accommodation of new, primarily industrial business activities, restricting the development of these areas for office and retail activities;*
2. *Except where identified for brownfield redevelopment, areas used for existing industrial activities are to be used primarily for that purpose, rather than as a location for new office and retail activities;*
3. *New office and retail activities are primarily to be directed to the Central City, Key Activity Centres, and neighbourhood centres;*
4. *A range of other business activities are provided for in appropriate locations; and*
5. *Business development adopts appropriate urban design qualities in order to retain business, attract investment, and provide for healthy working environments.*

Policy 6.3.6 – Business Land

To ensure that provision, recovery and rebuilding of business land in Greater Christchurch maximises business retention, attracts investment, and provides for healthy working environments; business activities are to be provided for in a manner which:

- 1. Promotes the utilisation and redevelopment of existing business land, and provides sufficient additional greenfield business land through to 2028 as provided for in Map A;*
- 2. Recognises demand arising from the relocation of business and industrial activities as a result of earthquake-damaged land and buildings;*
- 3. Reinforces the role and attractiveness of the Central City, as the city’s primary commercial centre, and that of the Key Activity Centres;*
- 4. Recognises that new office and retailing is primarily to be directed to the Central City, Key Activity Centres and neighbourhood centres where these activities reflect and support the function and role of those centres; or in circumstances where locating out of centre, will not give rise to significant adverse distributional or urban form effects;*
- 5. Recognises that new greenfield business land in Christchurch City is primarily for industrial activities, and restricts these areas for office and retail use;*
- 6. Recognises that existing business zones provide for a range of business activities depending on the desired amenity of the receiving environment and the potential or otherwise for significant distributional or urban form effects from retail and office activity on other centres;*
- 7. Utilises existing infrastructure availability, capacity and quality;*
- 8. Protects existing and future communities from reverse sensitivity issues;*
- 9. Ensures close proximity to labour supply, major transport hubs and passenger transport networks;*
- 10. Encourages self-sufficiency of employment and business activities within communities across Greater Christchurch;*
- 11. Promotes, where appropriate, development of mixed-use opportunities, within commercial business areas, where reverse sensitivity issues can be appropriately managed; and*
- 12. Incorporates good urban design principles appropriate to the context of the development.*

Policy 6.3.8 - Regeneration of Brownfield Land

To encourage and provide for the recovery and regeneration of existing brownfield areas through new comprehensive residential, mixed-use or business developments, provided such activities will ensure the safe and efficient functioning of the transport network and will not have significant adverse distributional or urban form effects on the Central City, existing Key Activity Centres and neighbourhood centres, or give rise to significant reverse sensitivity effects.

(b) Canterbury Earthquake Recovery Strategy

Leadership and Integration

Facilitate a timely and efficient recovery, including intervening where necessary to remove impediments, resolve issues and provide certainty.

Economic Recovery

- *Plan for a well-functioning Christchurch central city, thriving suburban centres, flourishing rural towns and a productive rural sector;*
- *Restoring the confidence of the business sector and the insurance and finance markets to enable economic recovery and growth.*
- *renewing the region's brand and reputation as a safe, desirable and attractive place to live, study, visit and invest;*
- *identifying and facilitating increased opportunities for early and substantial local and international investment;*
- *ensuring a range of employment options to attract and retain a high-calibre, appropriately skilled workforce;*
- *enabling a business-friendly environment that retains and attracts business;*

Social Recovery

- *Delivering community, health, education and social services that are collaborative, accessible, innovative and inclusive.*

Cultural Recovery

- *Acknowledging and celebrating the rich and diverse Ngai Tahu, colonial and other heritages and connections.*

Built Environment Recovery

- *Rebuild infrastructure and buildings in a resilient, cost effective and energy efficient manner;*
- *Developing a transport system that meets the changed needs of people and businesses and enables accessible, sustainable, affordable and safe travel choices.*
- *Zoning sufficient land for recovery needs within settlement patterns consistent with an urban form that provides for the future development of greater Christchurch;*

Natural Environment Recovery

- *Providing public access to and opportunities for outdoor recreation, cultural, social and economic activities;*
- *Enhance air quality through managing recovery activities that impact on air quality, such as heating, transport, demolition and construction.*

(c) Land Use Recovery Plan

Action 19: Christchurch City Council District Plan Review

Christchurch City Council to enable in the next review of its district plans, to provide for development of the Greenfield priority areas shown on map A, appendix 2 that are not already zoned for development in accordance with Chapter 6 of the Regional Policy Statement.

Action 24: Christchurch City Council District Plan Review

Christchurch City Council to enable in the next review of its District Plans the following measures:

Rebuilding of existing business areas

- i. existing industrial activities in business zones*
- ii. comprehensive developments in existing urban business areas, including brownfield sites.*
- iii. clarity and certainty about urban design requirements in key activity centres and other business zones*

Revitalising centres

- iv. zoning that defines the extent of each Key Activity Centre
- v. planning provisions for key activity centres and neighbourhood centres that have undergone a suburban centre master plan process.
- vi. mixed-use development within key activity centres.

Greenfield priority areas for business

- vii. *vii. Outline Development Plan to establish the broad land use pattern within the Hornby (B10, B11, and B12) and Belfast (B5) 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 (sic) that are located near Christchurch Airport.*
- ix. *zoning provisions for other greenfield priority areas for business shown on Map A, appendix 1.*
- x. *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 45: Christchurch City Council District Plan Review

Christchurch City Council to enable in the next review of its District Plans the following measures, as a matter of urgency:

- *Reduce consenting and notification requirements*
- *Address standards relating to urban design that ocule negatively impact upon recovery*
- *Provide for existing industrial activities in business zones*
- *Define the extent of key activity centres.*

In the prioritisation of these measures it is recognises that the policies, objectives and methods may be interim in nature and be superseded by subsequent amendments to the Christchurch City Council's District Plan.

(d) Mahaanui Iwi Management Plan

Issue P3: *Ngāi Tahu participation in urban and township planning and development.*

Issue P5: *The right to residence, use and development of ancestral land is inhibited by:*

- (a) Land zoning rules;*
- (b) Housing density rules;*
- (c) Provision of infrastructure and services;*
- (d) Multiple ownership; and*
- (e) Lack of council recognition of paper roads and easements as access points to Māori land.*

APPENDIX 2 BIBLIOGRAPHY

North Belfast ODP area	Author
<i>Project: CB1 Belfast CB1 Belfast - Integrated Transport Assessment, April 2013</i>	Aurecon
<i>Plan Change 82 Infrastructure Servicing Report, April 2013</i>	Pattle Delamore and Partners
<i>Archaeological Assessment Christchurch City Council Belfast Outline Development Plan (ODP) CB1 Northern Christchurch, July 2013</i>	Kevin Jones
<i>Landscape Assessment Report CB1 Outline Development Plan Belfast, May 2013</i>	CCC
<i>Plan Change 82 Belfast Geotechnical Assessment, April 2013</i>	Tonkin and Taylor
<i>Preliminary Site Investigation for Ground Contamination Belfast Greenfield Business Area - Plan Change 79 & 82, April 2013</i>	Tonkin and Taylor
Memo dated 16 January 2013 from Peter Barnes, Greenspace to Mark Stevenson and Peter Lovell, CCC - <i>Plan Change 82: CB1, Parks Planning feedback on draft ODP</i>	CCC
South West Hornby ODP area	
<i>CB2 CB7 Outline Development Plan Transport Assessment Informed by CAST Modelling, March 2013</i>	QTP
<i>CB2 CB7 Outline Development Plan Transport Assessment Informed by CAST Modelling – Addendum Report, April 2013</i>	QTP
<i>Stormwater Treatment and Disposal for Calder-Stewart and Watties land east of Marshs Road, May 2013</i>	CCC – Capital Programme Group
<i>Wastewater and Water Supply Servicing Report for the CB2 (Hornby) and CB7 (Hornby West) Greenfield Business Areas, July 2013</i>	CCC
<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
<i>Project: Geotechnical Investigation Report for the 132ha block of land in the southwest area of Christchurch for suitability for industrial development, May 2013</i>	Aurecon
<i>Urban Growth Areas CB2 & 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
Memorial Avenue/ Russley Road (MAIL)	Author

<i>Private Plan Change Request - Proposed Changes to Christchurch City Plan</i>	Memorial Avenue Investments Ltd	July 2010	Private proposal for a plan change (PC 35) to rezone the land between Memorial Ave, Russley Road, Avonhead Road and Living 5 Zone (Commodore Hotel)
<i>Revised Section 32 Report and Assessment of Environmental Effects</i>	Memorial Avenue Investments Ltd	July 2010	PC 35 Section 32 Report and Assessment of Environmental Effects
<i>Section 32 Landscape Assessment - Memorial Avenue Investments Ltd</i>	Pocock Design Environment	November 2013	Landscape assessment
<i>Memorial Avenue Investments Ltd Project – Tourism Market Information</i>	A report for Parkhill Properties	September 2013	Assessment of effects of establishing a hotel within the Memorial Avenue Investments Ltd site on other areas, including Central City
<i>Memorial Avenue Visual Study</i>	Pocock Design: Environment	March 2014	Assessment of effects of various height buildings on the Memorial/Russley overbridge gateway
<i>Minutes of Council Meeting (39.1 Notice of Motion - Memorial Ave)</i>	Christchurch City Council	3–4 October 2013	Council resolution on greater protection of the amenity and the gateway function of Memorial Ave

<i>Draft Submission on NZTA's Russley Road/Memorial Avenue Intersection Improvements Proposal</i>	Christchurch City Council, Strategy and Planning Group	March 2010	Assessment of landscape character and amenity
<i>Infrastructure Engineering Report 17215-001 R1</i>	For Memorial Ave Investments Ltd (MAIL)	March 2014	Assessment of infrastructure and services for the Plan Change site
<i>Plan Change 83 - North West Review Area Business Zones, Integrated Transport Assessment</i>	QTP for Christchurch City Council	July 2013	Assessment of transport effects of rezoning a number of sites in the North West Review Area, including the PC35 MAIL site
<i>Review of Draft Rules for MAIL Site from an Urban Design and Landscape Perspective</i>	Janet Reeves and Hannah Lewthwaite, Christchurch City Council	February 2014	A landscape and urban design assessment of the PC35 (MAIL) rezoning proposal
Cookie Time			
<i>Plan Change Request to the Christchurch City Plan (PC38) – Proposed Business Zoning</i>	Aurecon for Mayell Property Trust	September 2013	Proposed changes to the City Plan, assessment of effects and s 32 assessment, including transport, infrastructure, landscape, economic, noise and geotechnical assessments
Consultation letters, information for the affected parties and summary of feedback	Aurecon for Mayell Property Trust	2013	Records of consultation with and feedback and concerns from the adjoining neighbours and other parties
Consultation with New Zealand Transport Agency on the proposed Private Plan Change 38 (Cookie Time)	Christchurch City Council	2013	Records of consultation with New Zealand Transport Agency on the proposed private Plan Change 38 (Cookie Time)