

SECTION 32  
INDUSTRIAL CHAPTER - PHASE 2

Addendum to Section 32 in Phase 1

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## **Chapter 16 Industrial Zones**

### **Section 32**

#### **1.0 EVALUATION OF POLICIES/ 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. 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.

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## Chapter 16 Industrial Zones Section 32

### 1.1 REZONING OF GREENFIELD AREAS IN THE NORTH WEST

#### BACKGROUND

The Land Use Recovery Plan (LURP) identifies greenfield priority areas, additional to existing urban areas to meet growth to 2028. Action 24 of LURP requires Council to include provisions for these areas through the District Plan Review.

The LURP identifies four areas in the north west of Christchurch as greenfield priority areas for business as described below (from north to south):

- i. Land north of Waimakariri Road, comprising 15ha (referred to hereafter as Area 1)
- ii. Land north of Wairakei Road, between Wooldridge Road and Russley Road, comprising 50ha (referred to hereafter as Area 2)
- iii. Land between Memorial Avenue and Avonhead Road, to the immediate east of Russley Road, comprising 25ha.
- iv. Land between Hawthornden Road and Russley Road, comprising 35 hectares (referred to hereafter as Area 3)

The focus of this evaluation is on the greenfield priority areas, numbered i, ii, and iv, in the LURP, which were identified through a review by Christchurch City Council of a wider area known as the North West Review Area (NWRA). The NWRA, also known as Special Treatment Area 1, was identified in Canterbury Regional Council decisions on Proposed Change 1 to the Regional Policy Statement (December 2009), which had a specific policy as follows

*Policy 12: Special Treatment Areas*

*Specific analysis and planning shall be undertaken to achieve the sustainable management of the natural and physical resources of the following areas and to meet the stated expectations:*

*(a) In Northwest Christchurch (STA1) to determine the medium and long-term sustainable future of the area affected by airport noise*

...

The Council subsequently undertook specific analysis to determine the long term role of the Special Treatment Area and the activities appropriate in the area. This was on the basis that its ongoing use for rural activities over the long term is constrained due to a number of issues including small lot sizes, limited access by heavy machinery, and potential reverse sensitivity issues, while other activities (residential, education activities, health care facilities) are not appropriate given the area is inside the 50 dBA air noise contour line.

The review culminated in a report, dated September 2012, which made the following recommendations as copied below –

- (b) To direct staff to rezone the North West Review Area to a special 'Rural-Urban Fringe' zone as a part of the District Plan review, with the exception of the those areas subject to recommendation (c)*
- (c) To direct staff to prepare a Council led plan change to rezone 100 ha for industrial business purposes in the following areas (refer to Attachment 3)*
  - *approximately 15 ha for industrial purpose purposes at 711 Johns Road, north of Waimakariri Road (Area 1)*

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- approximately 50 ha for industrial business purposes, north of Wairakei Road between Woolridge Road and Russley Road (Area 2), and
  - approximately 35 ha for industrial business purposes, between Hawthornden Road and Russley Road (Area 3)
- (d) That individual Outline Development Plans shall be prepared for the whole of each area identified for business in Recommendation (c) as a plan change. The Outline Development Plans shall be prepared in accordance with the decisions version of Proposed Change 1 (or Chapter 12A should it be reinstated)
- (e) To direct staff to prepare a Council led plan change to provide a clearer policy framework in the City Plan for the Special Purpose (Airport) zone and for consideration to be given to enabling a wider range of industrial business activities in Dakota Park

Recommendation (c) is of particular relevance to this evaluation. Following Council's approval of the report and its recommendations, staff initiated a number of technical reports to assess the appropriateness of development in each of the three greenfield areas (i, ii and iv) (e.g. geotechnical investigations) and the effects associated with rezoning each area. The technical reports are summarised below.

Report title	Author	Date
Report – Proposed Plan Change 83 Preliminary Geotechnical Investigation Report	Tonkin and Taylor	May 2014
Plan Change 83 Business Land Study	Property Economics	December 2013
Report – Preliminary Site Investigation for Ground Contamination – Proposed Plan Change 83	Tonkin and Taylor	November 2013
Archaeological Assessment North-west Plan Change 83 and ODP area Proposed Urban Plan Change for Christchurch City Council	Kevin L. Jones Archaeologist Ltd	August 2013
Draft - Proposed Plan Change 83 – Urban Design Technical Report	Urban Design Team, Christchurch City Council	July 2013
Plan Change 83 North West Review Area Business Zones Integrated Transport Assessment	Quality Transport Planning (QTP)	July 2013
Draft Report - Plan Change 83 North West Review Area Stormwater Treatment and Disposal Options	Capital Programme Group, Christchurch City Council	May 2013
Proposed Plan Change 83 – Landscape Evaluation	Capital Programme Group, Christchurch City Council	May 2013
Memorandum from Peter Barnes, Greenspace to Mark Stevenson, re. Parks Planning Assessment - Plan Change 83: North West Area Business Zone	Greenspace unit, Christchurch City Council	May 2013

The Key issues identified from the technical assessment of the three areas are summarised below under the heading "Issue".

In addition to a technical assessment, consultation was undertaken with the wider community on the proposed rezoning of the three areas as summarised under the subheading 'Consultation'.

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### STRATEGIC CONTEXT

In a strategic context, the LURP provides a clear direction to ensure a suitable and sufficient supply of land:

*To ensure there is sufficient and suitable industrial land for the recovery through to 2028, this land (greenfield priority areas for business) has been identified primarily for industrial use (LURP, s 4.3.2 'Provide for Industrial needs').*

Paragraph 4.3.2 of the LURP states "To ensure there is sufficient and suitable industrial land for the recovery through to 2028, this land has been identified primarily for industrial use". This is also reflected in policy 6.3.6 (1) of the RPS, which refers to the provision of "sufficient additional greenfield priority area land".

Action 24 of the LURP specifically requires Council to enable the following in the review of the District Plan-

...

*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).*

An integrated approach has been taken in the north-west to the planning of greenfield areas in the north west. For example, the transport assessment has considered the cumulative effects of rezoning each area while also incorporating assumptions on the level of traffic generated by development in other areas identified for growth. This includes the other greenfield priority area land within the Special Purpose (Airport) Zone, subject to a Council led plan change.

The Canterbury Regional Policy Statement (CRPS) reinforces the need for a sufficient supply of land. Objective 6.2.2 states

*The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by:*

...

*(4) providing for the development of greenfield priority areas on the periphery of Christchurch's urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure;"*

Clause 1 of Policy 6.3.6 promotes the utilisation and redevelopment of existing business land, while 'providing sufficient additional greenfield priority area land for business land through to 2028'.

While the CRPS identifies greenfield priority areas to accommodate growth, Objective 6.2.2 indicates that it is appropriate that it is at a rate and in locations that meet demand while enabling the efficient provision and use of infrastructure.

The Statement of Expectations in Schedule 4 of the Order in Council<sup>1</sup> also seeks to ensure 'sufficient and suitable development capacity and land for industrial activities' (clause (e) of Schedule 4).

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<sup>1</sup> Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014

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### ISSUE

While the LURP identifies the three greenfield priority areas in the North West for business, there is a need to consider the appropriateness of rezoning the three areas.

Property Economics have evaluated the three areas in the NWRA from an economic perspective and make the following conclusions –

*“The fact that an increasing proportion of industrial growth is locating in both the South (Island) and North West illustrates the attributes that make the NWRA a positive location for industrial supply. In terms of the City this redistribution provides little. The positive economic benefits provided to the City through this potential rezoning include both an increase in competitively located industrial land (providing greater regional and national competitiveness) thus maintaining the level of business activity within the City and the ability for this competitive land to create an environment, with the potential SPAZ land that increases expected growth thus producing unique employment growth”*

Notwithstanding the positive economic effects from rezoning the three greenfield priority areas, there are potential costs, which Property Economics describe as the “*relative risks associated with over supplying industrial land*”. The costs with oversupplying land at one time include (but are not limited to) the following

- Greater costs for the community in servicing additional areas, each competing for funding
- Inefficiencies in the utilisation of infrastructure
- Inefficient development due to disjointed activity/uses across a large area

Property Economics also evaluate the relative merits of each of the three areas, building on the earlier work undertaken by Council as part of the review of the NWRA and technical reports prepared by other specialists. The key issues identified in respect of each area can be summarised as follows:

#### Area 1 North of Waimakariri Road (approximately 15ha)

- Pressure on the intersections of Waimakariri Road/Harewood Road and Watsons Road/ Harewood Road with long delays for traffic seeking to turn onto Harewood Road;
- Significant costs to mitigate effects with a new road recommended (by QTP) between Area 1 and Harewood Road, to consolidate the primary access to Area 1 with the existing intersection of Harewood Road and Stanleys Road. Alternatives were considered including:
  - Signals at Watsons Road/Harewood Road (in addition to signals at Wooldridge Road/ Harewood Road to mitigate the effects of Area 2)
  - Realignment of Waimakariri Road to form an all-movements intersection with Sawyers arms Road, to the east of its existing alignment
  - Reduced area for rezoning without upgrades to intersections with Harewood Road

These alternatives raise other issues, for example, signals at Watsons/Harewood Road would not be supportive of the intended function of an arterial road while also leading to delays for traffic on Harewood Road.

#### Area 2 North of Wairakei Road (approximately 50ha)

- Catchment of existing industrial activity with “some degree of growth” in business activity (Property Economics, 2013);
- Large area provides for growth and facilities agglomeration with similar industries to the south;

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- Interface with an industrial environment limits the potential for adverse effects on the adjoining environment to the south;
- Accessibility to the State Highway network and airport via Harewood Road and Wairakei Road, albeit limited with the upgrade to Russley Road;
- Mitigation of traffic effects can be achieved with upgrades to intersections in close proximity
- Insufficient capacity in the wastewater network but capable of being addressed through upgrades to the network.

#### Area 3 Land between Hawthornden Road and Russley Road (approximately 35ha)

- The Integrated Transport Assessment concluded that the space between the interchanges of Memorial Ave and the Southern Airport Access is 'substandard' without the development of Area 3, resulting in efficiency and safety effects. In practical terms, vehicles travelling southbound on SH1 have difficulty moving from the right hand to the left hand lane to exit at the Southern Airport Access due to the large volume of traffic predicted to join the left hand lane southbound on Russley Road from Memorial Ave.
- The issue described above is exacerbated by the development of Area 3 on the basis that additional traffic from Area 3 increases the load on the network, making weaving movements more difficult.
- A connection with the Southern Airport Access (proposed interchange adjoining Area 3) would require the designation and/or acquisition of land. This would be at a significant cost for the Council, notwithstanding the ability to recover costs through development contributions.
- Additional traffic on Hawthornden Road and Merrin Street as a result of Area 3 may pose an actual or perceived risk for school children. In addition to effects on safety, the increased traffic on Hawthornden Road and Merrin Street is anticipated to impact on residential amenity.
- Insufficient capacity in the wastewater network but capable of being addressed through upgrades to the network.

## CONSULTATION

### A. North West Review Area – Consultation on future use of area

The Council undertook consultation with land owners, occupiers and interest groups in the North West Review Area at an initial stage in the review (June – August 2011) to inform the analysis of issues and planning of the area's long term future. Views were sought on the future development potential and types of land use activities sought in this rural-urban fringe location.

The key findings from community and stakeholder feedback indicated a desire to retain the area's rural character and amenity, respondents valuing the sense of openness and spaciousness. There was also support for the retention of a buffer between rural/urban activities and residential areas/airport.

There was also support for change over the next 30 years with an increase in development including business activities. The locations considered most appropriate for business were alongside or as an extension of existing business/commercial areas on Wairakei Road or to compliment the existing developments on the Airport land near Russley and Johns Road.

While there was recognition of the airport noise contour acting as a constraint to residential activities, submitters sought a change from the 50 dBA Ldn airport noise contour to a reduced 55 dBA Ldn contour to enable residential development.

- Consultation on the rezoning of the three areas identified for business in the NWRA

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The Council sought feedback on the proposed rezoning of each of the three greenfield priority areas in February and March 2013 to inform the proposed plan change. Input was sought on the issues that needed to be addressed in the planning of each area and ideas on how the issues can be addressed.

There was a significant response from the community with a total of 1,276 written responses received. A petition was also received, which was signed by 500 people opposing the proposed rezoning of the area between Hawthornden Road and Russley Road. The Council held two drop-in sessions in late February 2013 with more than 100 members of the public attending, and a public meeting in mid-March 2013, which was attended by more than 400 people.

The key issues raised in responses included -

- Impacts of increased traffic and parking on the amenity and safety of the area (all three areas)
- Loss of rural character and views (all three areas)
- Loss of greenbelt/buffer between residential areas and the airport/ State Highway 1 (all three areas)
- Impacts on Avonhead Cemetery and the Earthquake Internment site (Area 3)
- Risk of polluting the unconfined aquifers (all three areas)
- Negative impacts on property values (particularly Area 3)
- The need for additional business land has not been sufficiently proven (all three areas)
- Alternative locations for industrial land across Christchurch are considered more appropriate (all three areas)
- Rezoning land for business on the city fringe will draw investment away from the city centre (all three areas)
- Lack of sufficient infrastructure (sewerage, water supply, etc.) to support more development (all three areas)

Respondents also gave their views on how issues should be addressed and how each of the three areas should develop. Many respondents chose not to respond to the question of how each area should 'look and feel' if the areas were developed for business, reflecting their opposition to development of the area(s) for industrial activities. Some respondents presented ideas on alternative uses for each of the three areas including a park; residential development; retaining the area for rural activities; extending Avonhead Cemetery into Area 3 or other activities.

Those who gave their views on how each area should develop generally sought a high amenity business environment with low rise buildings, wide setbacks, and landscaping to screen buildings. Respondents also sought the provision of on-site car parking and upgrades to roads and intersections amongst other matters. In respect of Area 3, respondents sought a significant landscaped buffer between any development and the cemetery/earthquake internment site, immediately adjacent to Area 3.

### EVALUATION

The following evaluation considers the information above including feedback through consultation and technical recommendations to determine the appropriate option for Areas 1 and 3.

The evaluation of Area 2 (North of Wairakei Road) is provided from page 12.

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>
Relevant objectives: Objective 1 (Option 1) The recovery and economic growth of the district's industry are supported and



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strengthened in existing and new greenfield industrial zones.	
Provision(s) most appropriate	Effectiveness and Efficiency
<p>Option 1: Rezone Areas 1 and 3 as Rural Urban Fringe</p>	<p><b>EFFECTIVENESS</b></p> <p>The proposal to rezone Areas 1 and 3 as Rural Urban Fringe achieves Objectives 3.6.1 and 3.6.2 of the Strategic Directions proposal by</p> <ul style="list-style-type: none"> <li>• Supporting the long-term sustainable and efficient use of resources (Objective 3.6.1 viii). It achieves this by retaining a resource for future generations;</li> <li>• promoting the efficient provision and use of infrastructure (clause vi of Objective 3.6.2) as it does not necessitate extension or upgrades to infrastructure beyond that required to service other greenfield priority areas in the north west;</li> <li>• providing certainty about where development can occur (clause i of Objective 3.6.2) through the rezoning of other greenfield priority areas for business in the north west;</li> <li>• consolidating development for urban activities (clause iii. of Objective 3.6.2) through rezoning those areas that adjoin the existing urban edge rather than rezoning Area 1, which is isolated in this respect;</li> </ul> <p>However, the option does not</p> <ul style="list-style-type: none"> <li>• Provide land to immediate recovery and longer term needs for businesses (clause i. of Objective 3.6.1)</li> <li>• Support the provision of a diverse range of opportunities, in terms of land supply, for businesses to establish and prosper (clause iii. of Objective 3.6.1)</li> </ul> <p>The option of rezoning Areas 1 and 3 as Rural Urban Fringe is not consistent with the LURP which identifies the two areas (Areas 1 and 3) as greenfield priority areas with Action 19 stating that the City Council is <i>"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"</i>.</p> <p>In respect of Chapter 6 to the CRPS, the option does not give effect to Policy 6.3.1 (3) in that it does not enable development of greenfield priority areas. However, Objective 6.2.2 of the CRPS states <i>"The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by:</i></p> <p>...</p> <p><i>(4) providing for the development of greenfield priority areas on the periphery of Christchurch's urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure"</i>.</p>

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	<p>(Underlining is my emphasis)</p> <p>The rezoning of other greenfield priority areas (MAIL and land north of Wairakei Road) provides capacity for growth in the short to medium term to meet anticipated demand.</p> <p>From a review of land supply across the city, there is 598 ha identified in the LURP as greenfield priority areas for business use. Of this, 226ha is zoned for commercial (12ha) or industrial activity (214ha). The balance yet to be zoned (315ha) (excluding Areas 1 and 3) is proposed to be zoned through the District Plan Review</p> <p>With take up rates in the order of 20 hectares per annum, the potential land available in greenfield areas amounts to at least 25 years supply, excluding the available capacity in established industrial areas of the city. It can be concluded from this overview that there is sufficient land for rebuilding and recovery needs at a city wide level, giving effect to the RPS.</p> <p>In respect of the North West, the rezoning of land north of Wairakei Road (47 ha) and the MAIL site (25 ha) in Phase 2 of the District Plan Review (and by a private plan change request for MAIL) is supplemented by a Council led plan change for the airport. This plan change provides additional capacity for industrial activities. When combined with greenfield priority areas, there is close to 200ha available in the North West for the short to medium term.</p> <p>By zoning the land as Rural Urban Fringe, it does not preclude the future development of the two areas for urban activities. In effect, it safeguards the resource for the longer term and should the issues associated with rezoning the two areas be addressed, they can be developed at a future date.</p> <p><b>EFFICIENCY</b> Benefits</p> <ul style="list-style-type: none"> <li>• Maintains a resource for the future development of urban activities;</li> <li>• Consolidates growth in a reduced area, enabling more efficient use of that land zoned for business;</li> <li>• Avoids the inefficient use of infrastructure to service additional areas beyond what is required in the short to medium term;</li> <li>• Avoids potential adverse effects on strategic infrastructure (state highway network) and other infrastructure (wider transport network) associated with the development of Areas 1 and 3;</li> <li>• Avoids additional costs for the Council and community of upgrades to existing and new infrastructure to service Areas 1 and 3 in addition to the funding of other infrastructure;</li> <li>• Maintains amenity of a fringe location, adjacent to residential and rural residential properties;</li> </ul>
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	<p>Costs</p> <ul style="list-style-type: none"> <li>• Reduced quantum of land available in the short to medium term to meet unforeseen growth/demand;</li> <li>• Potential for reduced economic activity and employment due to reduced capacity in north west (relative to what would otherwise occur)</li> <li>• Loss of potential value for landowners of properties in each area;</li> <li>• Future use of land is constrained and does not enable their development for a broader range and scale of activity.</li> </ul>
Options less or not as appropriate to achieve the objectives and policies:	
<p>Option 2: Zone Areas 1 and 3 for industrial activities</p>	<p>Appropriateness</p> <p>Effectiveness</p> <p>This option achieves Objectives 3.6.1 and 3.6.2 of the Strategic Directions proposal by</p> <ul style="list-style-type: none"> <li>• Providing additional capacity to meet the community's immediate recovery and longer term needs (clause i. of Objective 3.6.1)</li> <li>• Supporting diverse opportunities in terms of land for businesses to establish and prosper (clause iii. of Objective 3.6.1)</li> </ul> <p>The option will also support the recovery and economic growth of the district's industry (clause a. of Objective 16.1.1) by providing additional capacity to meet demand. Notwithstanding this, the option may not</p> <ul style="list-style-type: none"> <li>• Support the sustainable and efficient use of resources (clause viii. Objective 3.6.1 of Strategic Directions proposal) due to an oversupply of land (and therefore inefficient use of a larger area)</li> <li>• Promote the efficient provision and use of strategic infrastructure namely State Highway 1, due to additional traffic volumes from Area 3 in particular.</li> </ul> <p>Benefits</p> <ul style="list-style-type: none"> <li>• Provides certainty on the future use of the land</li> <li>• Enables development to proceed, subject to overcoming infrastructure constraints;</li> <li>• Provides economic benefits for landowners while also providing capacity for employment and economic growth.</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>• Zoning the land will signal that the land is appropriate for development, despite significant adverse effects;</li> <li>• Potential for significant adverse effects on the surrounding environment and community e.g. additional traffic impacting on residential amenity of the area adjacent to Area 3;</li> <li>• Adverse effects on the effective functioning of State Highway 1 due to additional traffic from Area 3 exacerbating issues of vehicles seeking to merge/weave between Memorial Avenue and the</li> </ul>

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	<p>Southern Airport Access;</p> <ul style="list-style-type: none"> <li>• Necessitates the designation and/or acquisition of land in order to achieve an appropriate level of access to Areas 1 and 3;</li> <li>• Contributes to an oversupply of industrial land, resulting in competing demands for the implementation of infrastructure, the inefficient use of infrastructure, and inefficient use of land.</li> </ul>
<p>Option 3 Zone as a Future Development Area to signal its potential future use for urban activities</p>	<p>Appropriateness</p> <p>Effectiveness</p> <p>The proposal to rezone Areas 1 and 3 as Future Development Areas achieves Objectives 3.6.1 and 3.6.2 of the Strategic Directions proposal by</p> <ul style="list-style-type: none"> <li>• Supporting the long-term sustainable and efficient use of resources (Objective 3.6.1 viii). It does so by retaining a resource until demand necessitates the provision of land and infrastructure;</li> <li>• Promoting the efficient provision and use of infrastructure (clause vi of Objective 3.6.2) by limiting the demands for new or extended infrastructure;</li> <li>• Providing certainty about where development can occur (clause i of Objective 3.6.2) through signalling that development is anticipated in the future;</li> </ul> <p>However, the option does not</p> <ul style="list-style-type: none"> <li>• Provide land to immediate recovery and longer term needs for businesses (clause i. of Objective 3.6.1)</li> <li>• Support the provision of a diverse range of opportunities, in terms of land supply, for businesses to establish and prosper (clause iii. of Objective 3.6.1)</li> </ul> <p>Benefits</p> <ul style="list-style-type: none"> <li>• Signals that the area is 'earmarked' for development;</li> <li>• Enables growth to be managed through future changes to the District Plan, which can lead to efficient use of land zoned and proposed to be zoned for business;</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>• May cause confusion for landowners on their ability to develop;</li> <li>• Requires landowners/developers to go through a subsequent plan change process to rezone their land</li> <li>• It may result in industrial companies locating elsewhere, which may not be as desirable as the two areas proposed for rezoning. This may result in inefficiencies.</li> </ul>

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Risk of Acting or Not Acting

Technical reports have been prepared to inform the rezoning of each of the greenfield priority areas in the north west as explained earlier. Assumptions have been made in those reports regarding the anticipated land uses, scale and timing of development based on the knowledge of each area and other industrial areas in the city. Notwithstanding this, there is potential for lesser effects if the land use activities, scale and/or timing of development differ from what has been assumed. Similarly, if a reduced area is zoned relative to the greenfield priority areas identified in the LURP, there is potential for a lesser effect.

While the merits of rezoning Areas 1 and 3 are based on the technical reports prepared to date and assumptions in those reports, they are considered to be sufficient to proceed without rezoning the two areas for business activities. It is therefore not considered necessary to take account of the risk of acting or not acting (RMA s 32(4)(b)).

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### 1.2 EVALUATION - REZONING OF GREENFIELD PRIORITY AREAS INCLUDING

- LAND NORTH OF WAIRAKEI ROAD (Area 2)
- LAND BETWEEN MEMORIAL AVENUE AND AVONHEAD ROAD, TO THE IMMEDIATE EAST OF RUSSELY ROAD (MAIL site)
- LAND WEST OF SPRINGS ROAD

#### ISSUE

There is a need to ensure an adequate supply of land to meet future demand while also providing the market with:

- a. choice in where land is available as companies have different locational requirements;
- b. suitable land that is adequately serviced, accessible, in proximity to a labour force and appropriate on which to develop.

The LURP identifies greenfield priority areas, additional to existing urban areas to meet growth to 2028. Action 24 of LURP requires Council to include provisions for these areas through the District Plan review.

Three areas identified as greenfield priority areas in the LURP are proposed for rezoning to industrial in Phase 2 of the District Plan Review, being

- i. Land north of Wairakei Road, between Wooldridge Road and Russley Road (Comprising 47ha) (Area 2);
- ii. Land between Memorial Avenue and Avonhead Road, to the immediate east of Russley Road (comprising 25ha) (MAIL site);
- iii. Land west of Springs Road, to the immediate south of the industrial area off Columbia Ave (Comprising 13.8ha).

#### STRATEGIC CONTEXT

In a strategic context, the LURP provides a clear direction to ensure a suitable and sufficient supply of land-

*To ensure there is sufficient and suitable industrial land for the recovery through to 2028, this land (greenfield priority areas for business) has been identified primarily for industrial use (LURP, s 4.3.2 'Provide for Industrial needs').*

Action 24 of the LURP specifically requires Council to enable the following in the review of the District Plan-

...

*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).*

The CRPS reinforces the need for a sufficient supply of land. Objective 6.2.2 states

*The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by:*

...

*(4) providing for the development of greenfield priority areas on the periphery of Christchurch's urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure;"*

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Clause 1 of Policy 6.3.6 promotes the utilisation and redevelopment of existing business land, while 'providing sufficient additional greenfield priority area land for business land through to 2028'.

The Statement of Expectations in Schedule 4 of the Order in Council<sup>2</sup> also seeks to ensure 'sufficient and suitable development capacity and land for industrial activities' (clause (e) of schedule 4).

#### CONSULTATION

##### *Land north of Wairakei Road*

The identification of the area north of Wairakei Road as an area for rezoning to industrial was on the basis of a review of the future role and land uses in an area known as the North West Review Area. A report adopted by Council in October 2012 concluded that the land in question was one of three areas appropriate for rezoning.

Following Council's approval to proceed with a Council led plan change, consultation was undertaken with the wider community on the proposal (February/March 2013). A range of issues were raised which has informed the provisions in the proposed district plan including (but not limited to):

- Impact on the semi-rural environment and amenity
- Traffic impacts on the surrounding network including safety and capacity
- Upgrades required to infrastructure to support development of the area

Consultation with landowners on the principle of rezoning the area north of Wairakei Road has previously occurred (September 2012 and February/March 2013) as a part of the review of the North West Review Area and ahead of the review of the proposed Replacement District Plan.

##### *MAIL site*

Council undertook consultation on the proposed rezoning of the Memorial Avenue Investments Limited site in 2014 as a part of pre-notification consultation on Stage 1 of the proposed District Plan. A range of issues were raised through consultation which has informed the provisions in the proposed District Plan including (but not limited to):

- Potential loss of amenity at a gateway to the City
- Effects of traffic and parking on the road network and residential amenity
- Potential effects on the aquifers beneath the site of industry.

Since Council's decision to defer the consideration of provisions for the MAIL site to Stage 2, a plan change request has been lodged by MAIL for rezoning of the land between Memorial Avenue and Avonhead Road. The provisions in the plan change request as notified on 29<sup>th</sup> November are generally supported by Council as reflected in a submission on the plan change. Those matters opposed in the plan change or for which amendments are sought include:

- The absence of objectives and policies to acknowledge the site specific outcomes sought for the zone
- Provision for up to 4,100m<sup>2</sup> of retail floorspace
- Discharge flows permitted from any site and the infrastructure works required before activities can discharge to the wastewater network

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<sup>2</sup> Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014

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- Amendments to the ODP to identify stormwater facilities and remove the identification of open space as a stormwater facility
- Minimum setback from Memorial Avenue
- Activity specific standards for Industrial Activity and Warehousing and Distribution activities
- Amendments to rules for cycle access and hours of delivery.

A submission made by MAIL on the plan change seeks a different outcome to the plan change request with provision sought for approximately 30,000 m2 of retail floorspace and an unspecified quantum of office floorspace. At the time of writing, further submissions were invited on the decisions sought in submissions.

### Basis for proposing the rezoning

Council is notifying provisions for the MAIL site as part of Phase 2 as it is required under clause 6(a) of the Order in Council to "*undertake a full review of the operative provisions of the existing district plans*". In undertaking a full review of the operative City Plan, Council must notify provisions for the MAIL site.

The proponents of the plan change request can withdraw their plan change request at any time up until decisions by the Hearings Panel on the request (clause 22). Therefore, if Council did not include provisions in Phase 2 of the proposed Replacement District Plan for the MAIL site and MAIL were to withdraw their request, Council would not be fulfilling its obligation under clause 6 of a full district plan review.

### EVALUATION

The methods for including provisions in the District Plan are evaluated below while ensuring such options are not inconsistent with the LURP.

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY</u> TO ACHIEVE THE OBJECTIVES	
Relevant objectives: Objective 1 (Option 1) The recovery and economic growth of the district's industry are supported and strengthened in existing and new greenfield industrial zones.	
Provision(s) most appropriate	Effectiveness and Efficiency
Option 1: Rezone the subject land as Industrial (Industrial Heavy for land west of Springs Road, and Industrial Park for land north of Wairakei Road, and between Avonhead Road and Memorial Avenue) with an Outline Development Plan to guide future development	<p>1. EFFECTIVENESS</p> <p>By rezoning the land for industrial activities, it will contribute to the supply of land required to accommodate future growth, consistent with Objective 1 of the Industrial proposal.</p> <p>While there are other greenfield areas identified in the LURP, some of which have been rezoned in Phase 1, the provision of additional land provides choice and supports/strengthens the economic and employment base of the District's industry. It is also considered sufficient and suitable to meet future demand to 2028 based on the historical levels of uptake.</p> <p>2. EFFICIENCY</p> <p>Benefits</p> <ul style="list-style-type: none"> <li>• Provides certainty on future use of the land</li> <li>• Supports a comprehensive approach to the development of greenfield areas that enables integration with existing networks including roads and other infrastructure</li> </ul>



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- Enables alignment between the planning and funding of infrastructure with land use
- An ODP enables the more efficient use of land by integrating infrastructure requirements i.e. stormwater facilities to serve the whole or a large part of the greenfield area, rather than each property having individual facilities
- The rezoning provides for the economic and social well-being of landowners due to increased land values and opportunities for further development of their properties
- Avoids landowners having to apply to rezone their land for industrial development, removing unnecessary costs of a private plan change process
- An ODP enables existing values e.g. protected tree, to be identified, which can be protected and integrated as a part of a development

In respect of the option to rezone land north of Wairakei Road, it supports development of an area that is more suitable for industrial development than other greenfield priority areas in the north west as it:

- Consolidates development adjacent to an established industrial area, facilitating agglomeration benefits for businesses in the area;
- Enables expansion of business activities without relocation to a new area;
- Supports efficiencies in the extension of infrastructure from the adjoining industrial area;
- Adjoins an existing industrial area, therefore reducing the potential for adverse effects on more sensitive land use activities.

In respect of the option to rezone land between Memorial Avenue and Avonhead Road, it also

- Supports development and growth in close proximity to a significant employment node. This may give rise to agglomeration benefits for business as well as efficiencies in the movement of air freight due to close proximity to the airport;
- Supports development in a location highly accessibly by vehicle from the state highway network. This can contribute to efficiencies in movement across the city while minimising adverse effects on surrounding residential communities;
- Consolidates development adjacent to a significant employment node, facilitating agglomeration benefits in the area;
- Provides for employment and services due to the development of business activities, which, in turn, supports the wellbeing of the community

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	<p>In respect of the option to rezone land west of Springs Road, it also:</p> <ul style="list-style-type: none"> <li>• Consolidates development adjacent to an established industrial area, facilitating agglomeration benefits for businesses in the area</li> <li>• Supports efficiencies in the extension of infrastructure from the adjoining industrial area</li> <li>• Adjoins an existing industrial area, therefore reducing the potential for adverse effects on more sensitive land use activities.</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>• Residents/ property owners adjoining the greenfield areas are likely to suffer a partial loss of rural outlook and level of amenity that currently exists in the rural-urban fringe</li> <li>• There are not considered to be additional costs borne by developers/ landowners from the proposed approach</li> </ul>
<p>Reasonably practicable options less or not as appropriate to achieve the objectives and policies:</p>	
<p>Option 2: Zone as a Future Development Area with an Outline Development Plan</p>	<p>Appropriateness Effectiveness</p> <p>This option does not contribute to the supply of land required to meet short to medium term demand, therefore being inconsistent with Objective 1. It may also result in industrial companies locating elsewhere, which may not be as desirable, leading to inefficiencies e.g. greater travel time between customer and business.</p> <p>Benefits</p> <ul style="list-style-type: none"> <li>• Signals that the area is 'earmarked' for development</li> <li>• Enables growth to be managed through future changes to the District Plan, which can lead to efficient use of existing zoned land including the development of vacant land in existing industrial areas</li> <li>• An ODP enables an integrated approach to development and the delivery of infrastructure</li> <li>• Reduces opportunity for ad-hoc development to occur</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>• May cause confusion for landowners on their ability to develop.</li> <li>• Requires landowners/developers to go through a subsequent plan change process to rezone their land</li> </ul>
<p>Risk of Acting or Not Acting</p>	
<p>Technical reports have been prepared to inform the rezoning the greenfield priority areas. Assumptions have been made in those reports regarding the anticipated land uses, scale and timing of development based on the knowledge of each area and other industrial areas in the city. Notwithstanding this, there is potential for greater/lesser effects if the land use activities, scale and/or timing of development differ from what has been assumed.</p> <p>While the merits of rezoning the three areas is based on technical reports/other information for which assumptions have been made, this information is considered to be sufficient to proceed with rezoning the</p>	

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three greenfield priority areas for business activities. It is therefore not considered necessary to take account of the risk of acting or not acting (RMA s 32(4)(b)).

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### 1.3 AREA SPECIFIC PROVISIONS FOR GREENFIELD AREA WEST OF SPRINGS ROAD

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES	
<p>Relevant objectives: 16.1.2 Objective 2 - Amenity in industrial zones and the effects of industrial activities</p> <p><i>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.</i></p> <p><i>b. Industrial sites visible from the road have a higher level of visual amenity, particularly the Industrial General Zone (North Belfast) and Industrial Heavy Zone (South West Hornby) that are in highly prominent locations and act as gateways to the City.</i></p> <p><i>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 multi-value approach to stormwater management in greenfield areas, and the protection and enhancement of waahi tapu and waahi taonga including waipuna.</i></p>	
Provision(s) most appropriate	Effectiveness and efficiency
<p>Option 1 Proposed rules</p> <ul style="list-style-type: none"> <li>i. Rules restricting site and road access to the zone from Springs Road</li> <li>ii. Setback and landscaping adjoining the proposed Southern Motorway (Springs Road)</li> </ul>	<p><b>Effectiveness</b> The methods proposed are to:</p> <ul style="list-style-type: none"> <li>• achieve an integrated approach to development and infrastructure delivery, supporting the achievement of Objective 2(a) of the Industrial proposal and Objective 3.6.1(a)(iv) of the Strategic Directions proposal;</li> <li>• manage the effects of development in the zone on infrastructure, supporting the achievement of Objective 2(a) of the Industrial proposal; and</li> <li>• manage the interface with a proposed strategic corridor into the City, supporting the achievement of Objective 2(b) of the Industrial proposal.</li> </ul> <p><b>Efficiency</b> <b>Benefits</b></p> <ul style="list-style-type: none"> <li>• Identification of the location for access to the zone from Springs Road on the ODP and associated rules restricting access minimises the potential for adverse effects on the effective functioning (incl. efficiency and safety) of Springs Road, having regard to changes planned as part of the Southern Motorway extension i.e. Springs Road comprising an over bridge above CSM2</li> <li>• Setback and landscaping rules reduce the dominance of buildings and support a higher level of visual amenity as viewed from the adjoining motorway</li> </ul> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>• Rules limiting access may inhibit</li> </ul>

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	<p>development of a part of the area if reliant on another landowner to provide access. However, this is only an issue if the land is subdivided and sold to multiple parties</p> <p>Rules for setbacks, landscaping</p> <ul style="list-style-type: none"> <li>• Reduce the development potential across the zone, which may necessitate more land to be zoned over the long term;</li> <li>• Greater costs associated with landscaping and compliance;</li> <li>• Inefficient use of land for development</li> </ul>
<p>Reasonably practicable options less or not as appropriate to achieve the objectives and policies:</p>	
<p>Option 2 Reliance on generic provisions i.e. No specific controls on access or the interface with the Southern Motorway</p>	<p>Appropriateness</p> <p>While this option reduces potential compliance costs and contributes to the more efficient use of land, it will not support a higher level of amenity adjacent to a strategic corridor. This does not support Objective 2 of the Industrial proposal.</p> <p>No controls on access to Springs Road or Colombia Avenue may also lead to adverse effects on the adjoining road network, which is not aligned with Objective 2(a) of the Industrial proposal. Any form of access closer to the proposed Springs Road over bridge above CSM2 may result in effects on safety and efficiency of the network.</p>
<p>Risk of acting or not acting</p>	
<p>The traffic effects of access from the proposed greenfield area have been evaluated with assumptions made regarding the anticipated land uses, scale and timing of development as well as the proposed transport network around the site. An assumption has been made that the extension of the Christchurch Southern Motorway (CSM2) is in place which is scheduled to be constructed from the 2015/16 financial year.</p> <p>There is a risk that changes in the environment or the changes to the design of CSM2 affects transport movements in the vicinity of the site, which necessitate a review of the assumptions made in rezoning the land west of Springs Road and specific provisions to manage traffic effects. However, this risk is considered low and the effects of rezoning the subject land can be adequately mitigated through rules in the District Plan.</p> <p>Similarly, rules specifying setbacks and landscaping from CSM2 assume that the motorway is in place during the course of development within the zone. Given the scheduling of construction works for the CSM2, the risk of it not proceeding is low and provision for setbacks/landscaping are appropriate. Even if CSM2 were not to proceed, the rules would only apply when it is in place.</p>	

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**1.4 AREA SPECIFIC PROVISIONS FOR GREENFIELD AREA NORTH OF WAIRAKEI ROAD**

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES	
<p>Relevant objectives:</p> <p>16.1.2 Objective 2 - Amenity in industrial zones and the effects of industrial activities</p> <p><i>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.</i></p> <p><i>b. Industrial sites visible from the road have a higher level of visual amenity, particularly the Industrial General Zone (North Belfast) and Industrial Heavy Zone (South West Hornby) that are in highly prominent locations and act as gateways to the City.</i></p> <p><i>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 multi-value approach to stormwater management in greenfield areas, and the protection and enhancement of waahi tapu and waahi taonga including waipuna.</i></p>	
Provision(s) most appropriate	Effectiveness and efficiency
<p>Option 1 Proposed rules</p> <p>i. Rules restricting road and site access to the zone (From Russley Road, Harewood Road)</p> <p>ii. Limit on development to align with infrastructure upgrades;</p> <p>iii. Protection of landscape feature i.e bed of the Styx River (Wairakei Road);</p> <p>iv. Setbacks and landscaping from the Rural Urban Fringe and Specific Purpose (Schools) zones.</p>	<p>Effectiveness</p> <p>The methods proposed are to:</p> <ul style="list-style-type: none"> <li>• achieve an integrated approach to development and infrastructure delivery, supporting the achievement of Objective 2(a) of the Industrial proposal and Objective 3.6.1(a)(iv) of the Strategic Directions proposal;</li> <li>• manage the effects of development in the zone on infrastructure (limit on development to align with infrastructure) and the surrounding environment (through setback and landscaping requirements), supporting the achievement of Objective 2(a) of the Industrial proposal; and</li> <li>• recognise a natural resource, being the bed of the Styx river, supporting Objective 3.6.4 (a)(iii) of the Strategic Directions proposal (in retaining and enhancing the special character and amenity values associated with the resource);</li> </ul> <p>Efficiency</p> <p>Benefits</p> <ul style="list-style-type: none"> <li>• In respect of limits on access, it enables the development and associated transport movements to be managed to avoid adverse effects on the function, efficiency and safety of the adjoining transport network, particularly Russley Road and Harewood Road</li> </ul> <p>Similarly, provision to achieve integration between development and upgrades to the transport network enables effects on the</p>

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	<p>network to be managed;</p> <ul style="list-style-type: none"> <li>• Recognition and protection of the function of SH1 as strategic infrastructure through restrictions on any road or site access to Russley Road;</li> <li>• Retains and recognises a special feature through the proposed Industrial Park Zone (Wairakei Road). This supports amenity, landscape and cultural values</li> <li>• Higher quality outcome for the Industrial Park zone, with landscaping commensurate with the environment anticipated</li> <li>• Effects of buildings on visual amenity in adjoining zones minimised by setbacks and landscaping</li> <li>• Setbacks and landscaping at interface supports function of the zone with buildings not dominating open space and landscaping.</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>• Rules limiting access may inhibit development of a part of the area if a landowner is reliant on another landowner to provide access</li> <li>• Additional costs for landowners of landscaping</li> <li>• Increased compliance costs if insufficient landscaping provided</li> <li>• Reduced development potential due to inability to develop all of land for industrial activities if their property is traversed by the bed of the Styx river or at interface with adjoining zones</li> <li>• Inefficient use of land for development</li> </ul>
<p>Reasonably practicable options less or not as appropriate to achieve the objectives and policies:</p>	
<p>Option 2 Reliance on generic provisions i.e. No specific controls for zone</p>	<p><b>Appropriateness</b> While this option reduces potential compliance costs and contributes to the more efficient use of land, it will not support values associated with a landscape feature through the site and has the potential to result in adverse visual effects on adjoining zones. This does not support Objective 2 of the Industrial proposal.</p> <p>Without specific controls on road or site access or when upgrades need to occur relative to development progress, there is anticipated to be adverse effects on the effective functioning of strategic infrastructure (State Highway 1) and the surrounding road network. This includes effects on</p>

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	the efficient movement of vehicles, safety and capacity of the network due to increased vehicle generation and the increased presence of heavy vehicles. This also does not support Objective 2 of the Industrial Proposal.
Risk of acting or not acting	
<p>The traffic effects of access from the proposed greenfield area have been evaluated with assumptions made regarding the anticipated land uses, scale and timing of development as well as the proposed transport network around the site.</p> <p>There is a risk that changes in the environment or the changes to designs for the widening of Russley Road affects transport movements in the vicinity of the site, which necessitate a review of the assumptions made in rezoning the land and specific provisions to manage traffic effects. However, this risk is considered low on the basis that NZTA are seeking the designation of land for widening. Subject to the resolution of an appeal, there is an indication that works will commence. Notwithstanding this, the effects of rezoning the subject land can be adequately mitigated through rules in the District Plan.</p> <p>Provision to recognise the landscape feature of the former Styx river bed is based on assumptions regarding the westerly extent of the Styx River (west of Stanleys Road). However, there is certainty of its path to the immediate west of Wooldridge which suggests the course it took ran in general alignment with that indicated on the ODP.</p> <p>On this basis, there is not a need to take account of the risk of acting or not acting (RMA s32(4)(b)).</p>	

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**1.5 INDUSTRIAL PARK ZONE (MEMORIAL AVENUE)**

**1.5.1 EVALUATION OF OBJECTIVE 2**

OBJECTIVE MOST APPROPRIATE WAY TO ACHIEVE THE PURPOSE OF THE RMA	
Objective	Summary of Evaluation
<p>16.1.2 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 <u>in the Industrial General Zone (North Belfast) and Industrial Heavy Zone (South West Hornby) and Industrial Park zone (Memorial Avenue)</u> that are in highly prominent locations and act as gateways to the City</p> <p>...</p>	<ol style="list-style-type: none"> <li>1. The proposed amendments to Objective 2 are to recognise the importance of the site on the corner of Russley Road and Memorial Avenue, given its prominence at a gateway to the city.</li> <li>2. With regard to achieving the purpose (s 5) of the RMA and the related principles contained in s 6, 7 and 8 of Part 2 of the Act, the proposed Objective would:               <ol style="list-style-type: none"> <li>a. ensure that adverse effects are minimised and a higher level of visual amenity is achieved;</li> <li>b. enhance the quality of the environment at a gateway to the city (section 7);</li> <li>c. promote amenity improvements (section 7) that may contribute to business retention, attracting investment and providing a healthy working environment; and</li> <li>d. limit the potential adverse effects (section 5(2)(c) of development, contributing to the sustainable management of physical resources (including the urban area at the fringe of the city e.g. 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.</li> </ol> </li> </ol>
Option less appropriate in achieving the purpose of the RMA.	
<p>Option 2 Reliance on Objective 2 of the Industrial Proposal as notified in Phase 1.</p>	<ol style="list-style-type: none"> <li>1. This option would give effect to the purpose (s 5) of the RMA and the related principles contained in ss 6, 7 and 8 of Part 2 of the Act as outlined in the Section 32 on phase 1 provisions. However, the Phase 1 provisions do not clearly articulate what is anticipated on the site in question which has unique attributes</li> <li>2. The option would therefore not support the enhancement of amenity values or quality of the particular area to the same extent as other areas, specifically referenced in Objective 2 of the Phase 1 provisions</li> </ol>

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1.5.2 EVALUATION OF NEW POLICY 12 'MEMORIAL AVENUE' AND SUPPORTING METHODS

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY</u> TO ACHIEVE THE OBJECTIVES	
<p>Relevant objective(s): Objective 3 Amenity in the Industrial Park Zone (Memorial Avenue) (a) The Industrial Park Zone (Memorial Avenue) has a high visual and aesthetic quality given its prominent location as a gateway to the city and adjacent to Memorial Avenue.</p>	
Provision(s) most appropriate	Effectiveness and efficiency
<p>Policy 12 Memorial Avenue</p> <p>(a) Maintain the amenity values along Memorial Avenue and its function as a war memorial and visitor gateway through the provision of buildings of a high visual and aesthetic quality, limited signage, a large building setback and landscaping along the frontage with Memorial Avenue.</p> <p>Methods Rules</p> <ul style="list-style-type: none"> <li>- Design assessment for new buildings/ additions within 50m of Memorial Avenue/ Russley Road</li> <li>- Non-complying activity status for billboards within the zone</li> <li>- Non-complying activity status for industrial activity or warehousing/ distribution activity within 50m of Memorial Avenue</li> <li>- Non-complying activity status for food and beverage outlets (with drive-through facilities) within 50m of Memorial Avenue or Russley Road</li> <li>- Restricted area for guest accommodation</li> <li>- Reduced height limit within 50m of Memorial Avenue of 12m</li> <li>- Reduced height limit of 15m across other parts of the zone relative to other zones</li> <li>- Setback of 20m from Memorial Avenue and 10m from Russley Road, and associated landscaping</li> <li>- Restrictions on use of setbacks from Memorial Avenue and Russley Road, and the location of car parking</li> <li>- Controls on signage adjacent to Memorial Avenue</li> </ul>	<p>Effectiveness</p> <p>The policy and associated methods directly support proposed Objective 2(b) by contributing to a high quality environment in a highly prominent location at a gateway to the city.</p> <p>Increased setbacks, landscaping, restrictions on the use of setbacks and signage adjoining Memorial Avenue maintains a level of amenity in keeping with the character of Memorial Avenue, its role as a war memorial and gateway. In respect of both the frontage with Russley Road and Memorial Avenue, it also reduces the visual dominance of buildings and maintains a higher level of amenity than would otherwise occur.</p> <p>The reduced height limit (12m) adjacent to Memorial Avenue seeks to maintain the anticipated views through the proposed arches of the overbridge, by avoiding adverse effects created by the intrusion of buildings within this space.</p> <p>A height limit of 15m across the balance of the site is to recognise that the site is at a gateway to the City where buildings should not dominate or protrude in terms of height relative to the surrounding built form. It also has regard to the amenity values of the immediately surrounding environment and Memorial Avenue's role as a memorial. A height limit of 15m also minimises the potential for adverse effects on the adjoining zones, including the Residential Guest Accommodation zone to the East, the residential area to the south and east, and residential properties within the zone.</p> <p>Controls on activities within 50m of Memorial Avenue facilitates and the definition of a restricted area for guest accommodation seeks an outcome where buildings intended for specific uses (offices, guest accommodation and that exhibit a higher quality, are encouraged on these frontages, as opposed to industrial buildings/ warehousing. The latter would not contribute to a level of amenity anticipated on these frontages.</p> <p>Efficiency Benefits</p> <ul style="list-style-type: none"> <li>• The proposed policy provides a high quality environment for those passing this gateway to the City, along Russley Road or</li> </ul>

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	<p>Memorial Avenue</p> <ul style="list-style-type: none"> <li>• Recognises the importance of Memorial Avenue as a memorial and the significance of this site;</li> <li>• Supports the wellbeing of people and communities by contributing to a sense of pride in what is developed at a gateway to the city;</li> <li>• Built form standards support the vision of a high quality environment for business where there is not a dominance of buildings over open space;</li> <li>• Controls on the scale and siting of development minimises the effects of development on the surrounding environment while also ensuring that buildings are commensurate with their context;</li> <li>• Provision for guest accommodation provides an opportunity for a landmark building, which could add interest and amenity in this important location;</li> <li>• Providing for guest accommodation is efficient in avoiding the need for resource consent for such development</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>• Proposed rules place additional constraints on development in this area compared to other areas in the Industrial Park Zone, which, depending on the particular proposal may lead to additional consenting costs compared to similar developments in different parts of the Industrial Park Zone.</li> <li>• Restrictions on land use and built form may not enable developers/landowners to achieve the outcome they desire.</li> <li>• Reduced area for development due to required setbacks.</li> </ul>
Options less or not as appropriate to achieve the objectives and policies:	
<p>Policy 8 – Option 2 (Status quo – Operative City Plan)</p> <p>To improve the visual amenity and street environment in industrial areas.</p> <p>Apply general provisions to the zone</p>	<p>Appropriateness</p> <p>This option does not support the achievement of Objective 2 as amended in that it does not articulate how that objective will be achieved for the site. This option could lead to adverse effects on the anticipated amenity of the site and adjoining space, particularly Memorial Avenue.</p> <p>It would reduce the number of consents required relative to Option 1 and result in the more efficient use of land. However, it could lead to development out of scale and context with its surroundings.</p>
Risk of acting or not acting	
<p>Sufficient information exists on the history, function and amenity of Memorial Avenue and the proposals for an overbridge at the Memorial Avenue/Russley Road intersection to make informed decisions on provisions for managing the interface with Memorial Avenue and Russley Road.</p> <p>There is a risk that changes in the environment or the planning/ design of the widening of Russley Road affects proposals for the intersection of Memorial/Russley Road. However, this risk is considered low on the basis that</p>	

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NZTA are seeking the designation of land for widening and subject to the resolution of an appeal, there is an indication that works will commence in the near future.

With this in mind, there is no need to take account of the risk of acting or not acting (RMA s 32(4)(b)).

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### 1.6 BROWNFIELD SITES

#### ISSUE

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. This has led to a shift of businesses on either a temporary or permanent basis to other parts of the city, sub-region and country.

The shift in focus of employment to the west exacerbates a trend from the last decade. With the shift in demand, there are potentially sites that will remain under-utilised or vacant and which are suitable for residential or mixed use development.

#### STRATEGIC CONTEXT

The LURP seeks to 'Provid(e) for comprehensive developments in existing business areas including brownfield sites (Action 24) while direction in chapter 6 of the CRPS is to enable the redevelopment of suitable brownfield sites for housing or mixed use development (CRPS, Objectives 6.2.2(2) and 6.2.6(2), Policy 6.3.7(2) and (6) and Policy 6.3.8). The direction in policy 6.3.8 is supported by a method under that policy that "Territorial authorities ...should ...(2) identify in district plans brownfield sites that are appropriate for redevelopment

The CRPS is given effect to in the Strategic Directions proposal, which includes the following policy -

*Increase the housing development opportunities in the urban area to meet the intensification targets specified in the Canterbury Regional Policy Statement, Chapter 6, Objective 6.2.2 (1), particularly: ... (iii) in suitable brownfield areas."*

#### CONSULTATION

The Crown's submission on Phase 1 of the proposed district plan has sought explicit support 'to enable or encourage the redevelopment of brownfield sites in the proposals', with further provisions including objectives and rules to provide a very clear signal of support.

#### PROPOSAL

Brownfield sites identified from previous work, a review of sites in Council's industrial vacant land register and the planning maps (to identify 'isolated' sites zoned industrial) have been rezoned in Phase 1 or are the subject of submissions received on Phase 1. These include

- 64 Port Hills Road – proposal to rezone in Phase 1 to Suburban Residential
- Sydenham School site – proposal to rezone in Phase 1 to Commercial
- Firestone site – proposed as a Business Park. Submission seeking rezoning in Phase 1.
- 338 Pages Road, Aranui – Submission seeking rezoning in Phase 1.
- 186 Breezes Road – Submission seeking rezoning in Phase 1.
- Land between Lincoln Road and railway line – Submission seeking rezoning in Phase 1.
- Railway land between Wilsons Road south and Ensors Road - Proposal to rezone in Phase 2 to Transport zone.

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There are no additional sites identified for rezoning or identification as brownfield sites in Phase 2 due to the limited number of large vacant industrial sites considered suitable. However, policy support in the Industrial proposal of Phase 1 provides the opportunity for proposals for the redevelopment of brownfield sites for residential/mixed use activities.

### 1.7 INTERFACE WITH OTHER ZONES

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES	
<p>Relevant objectives:</p> <p>3.6.6. (Objective – Amenity, Health and Safety) of the Strategic Directions Proposal</p> <p><i>The health and safety of the district’s residents is protected, and the amenity values they enjoy are protected or enhanced, including:</i></p> <p><i>i. the protection of people and the environment from the adverse effects of contaminated land and hazardous substances</i></p> <p><i>ii. new activities and development do not create significant health, nuisance or other adverse effects for people or the environment</i></p> <p><i>iii. sensitive activities are not established near lawfully established activities that generate noise, odour and other adverse effects.</i></p> <p>16.1.2 Objective 2 – Amenity in industrial zones and the effects of industrial activities</p> <p><i>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.</i></p> <p>...</p>	
Provision(s) most appropriate	Effectiveness and efficiency
Options less or not as appropriate to achieve the objectives and policies:	
<p>Option 1 (Apply visual amenity/screening provision)</p> <p><i>Where a site adjoins an Open Space or Specific Purpose or Rural zone, provision shall be made for landscaping, fence(s), wall(s) or a combination to at least 1.8m along the length of the zone boundary, excluding any road frontages.</i></p> <p><i>Where landscaping is provided, it shall be for a minimum depth of 1.5m along the zone boundary.</i></p>	<p>Effectiveness</p> <p>The proposed rule minimises adverse effects on adjoining land uses, supporting Objective 2 (a) of the Industrial proposal and Objective 3.6.6 (ii) of the Strategic Directions proposal.</p> <p>The proposal reduces the level of control relative to the operative plan in respect of the interface with non-residential zones and provides flexibility for a range of outcomes to manage effects at the zone boundary.</p> <p>Benefits</p> <ul style="list-style-type: none"> <li>• Reduces the visual effect of an industrial buildings on adjoining zones and the amenity anticipated in that zone</li> <li>• Provides flexibility in the screening of industrial buildings</li> <li>• Enables utilisation of the site and therefore efficient use of land within the industrial zone</li> <li>• Provides sufficient space for trees to grow with</li> </ul>

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	<p>adequate light</p> <ul style="list-style-type: none"> <li>• Achieves a reduction in the number of standards and therefore the number of consents triggered.</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>• Additional cost for developer/landowner of screening</li> </ul>
<p>Option 2 Apply built form standards including setbacks, recession plane to the interface between industrial and other zones, consistent with rules for the interface with residential zones.</p>	<p>Effectiveness This option supports Objective 2 of the Industrial proposal, which seeks to minimise the effects of industrial buildings on adjoining areas and the amenity of those areas.</p> <p>Applying a setback provides space to accommodate tree growth, thereby softening the effect of larger industrial buildings while also reducing the visual dominance of a large building as viewed from adjoining public spaces.</p> <p>Application of recession plane rules also avoids shading effects consistent with Objective 2 of the industrial proposal. This enables enjoyment of the space that may otherwise be lost through dominance of an adjoining building and retention of a level of amenity consistent with the outcomes intended for the zone.</p> <p>Benefits</p> <ul style="list-style-type: none"> <li>• Reduces the visual effect of a commercial buildings on adjoining zones and the amenity anticipated in that zone</li> <li>• Provides sufficient space for trees to grow with adequate light</li> <li>• Maintains a level of sunlight and outlook in the adjoining zones, minimising effects on adjoining space and the use of that space</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>• Fails relative to the Statement of Expectations in not achieving a reduction in the number of standards or consenting</li> <li>• Additional cost for developer/landowner i.e. a part of their site cannot be used for buildings, potentially resulting in the inefficient use of land</li> <li>• Costs for developer/landowner of designing/locating a building to not breach the recession plane requirement</li> <li>• Costs of establishing and maintaining trees</li> </ul>

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<p>Option 3 No controls - No setback. Recession plane and landscaping requirements applied to interface with adjoining zones (excl. residential).</p>	<p>Appropriateness While this option enables efficient use of the land, provides for the flexible use of space, and reduces potential costs of compliance, it could result in adverse effects of industrial buildings on adjoining zones. This includes a visual dominance of building form, shading and the resultant loss of amenity, which transfers the cost of screening/ amenity improvements to the owner of the adjoining site. This will not support Objective 2 of the industrial proposal, which seeks to ensure development is integrated with its surroundings and adverse effects on adjoining land uses are minimised.</p>
<p>Risk of acting or not acting</p>	
<p>Applying screening requirements to the interface between industrial and other zones is based on an understanding of the potential effects that industrial activities can have on the use of adjoining space. This includes shading and a visual dominance of built form which can reduce the level of amenity in that space. There may be examples not known to Council of other methods that have achieved successful outcomes (beyond the use of a wall, fence or landscaping for screening purposes). Notwithstanding this, there is a understanding of the effects at an interface between an industrial zone and more sensitive zone, and not a need to take into account the risk of acting or not acting (RMA s 32(4)(b)).</p>	



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### 1.8 PROVISIONS TO RESTRICT THE DISCHARGE OF WASTEWATER

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES	
<p>Relevant objectives: 16.1.2 Objective 2 - Amenity in industrial zones and the effects of industrial activities</p> <p><i>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.</i></p> <p><i>b. Industrial sites visible from the road have a higher level of visual amenity, particularly the Industrial General Zone (North Belfast) and Industrial Heavy Zone (South West Hornby) that are in highly prominent locations and act as gateways to the city.</i></p> <p><i>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 multi-value approach to stormwater management in greenfield areas, and the protection and enhancement of waahi tapu and waahi taonga including waipuna.</i></p>	
Provision(s) most appropriate	Effectiveness and efficiency
<p>Option 1 Proposed rules Limits on wastewater discharge in the south west Hornby area (as per the Operative City Plan) and in greenfield priority areas proposed for rezoning in Phase 2</p>	<p><b>Effectiveness</b></p> <ul style="list-style-type: none"> <li>The rules proposed enable the effects of development on infrastructure and the environment to be managed, supporting the achievement of Objective 2(a) of the Industrial proposal</li> </ul> <p><b>Efficiency</b></p> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>Minimises the potential for overflows in the wastewater network due to insufficient capacity</li> <li>Reduces the potential for contamination of land and groundwater due to overflows from the network</li> <li>Recognises the sensitivity of the surrounding environment over unconfined and semi-confined aquifers</li> <li>Supports the outcome for a high amenity environment in the Industrial Park zones at Memorial Avenue and Wairakei Road, which heavy industry is not commensurate with.</li> </ul> <p><b>Costs</b></p> <ul style="list-style-type: none"> <li>Rules limiting the discharge of wastewater precludes some industries from locating in a large area, identified for heavy industry. Unmet demand may result in pressure for land in less appropriate locations;</li> <li>The location of 'wet industries' in alternative locations puts pressure on other parts of the wastewater network, which may have sustained damage in the earthquakes.</li> </ul>
Reasonably practicable options less or not as appropriate to achieve the objectives and policies:	

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<p>Option 2 No specific controls on wastewater discharge rates Reliance on the Trade Waste Permit process</p>	<p>Appropriateness While this option reduces potential compliance costs (due to the absence of rules in the District Plan), it will not support Objective 2 of the Industrial proposal, which seeks the avoidance, remedying or mitigation of adverse effects.</p> <p>A development may be well progressed before consideration is given to Trade Waste bylaw by which time resource consent has been issued for other non-compliances. By inclusion in the District Plan, it makes it clear that wet industries are not anticipated in the area defined and it enables consideration of the effects on natural and physical resources.</p>
<p>Risk of acting or not acting</p>	
<p>The provisions are based on the information available regarding the sensitivity of the receiving environment and capacity of the wastewater network. There is potential for new information to become available in the future on these matters but given the potential risks of overflows/contamination to ground, a precautionary approach is required.</p> <p>The risk of not acting is the potential for significant adverse effects on the receiving environment due to overflows of wastewater as has occurred elsewhere in the city.</p>	

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### 1.9 RESOURCE EFFICIENCY STANDARDS

#### ISSUE

There are two issues that the proposal seeks to address -

#### 1. *The quality of commercial buildings in industrial zones*

Poorly designed and constructed buildings are inefficient to operate, create unhealthy working environments and may adversely affect the amenity of the site and its surroundings.

#### 2. *Environmental impacts of commercial and industrial buildings/space*

Existing and new buildings can be designed and constructed in a manner that requires more energy and water to operate and may result in additional waste than is necessary. Greater use of energy and water reduces the supply available, which may not be sufficient to meet current and future needs. For example, increased demand for energy combined with a reduced supply (for other reasons e.g. low lake levels limit hydro-generation) may necessitate restrictions or require changes in how energy is used. Increased energy use can also lead to adverse effects on the local and global environment e.g. carbon emissions.

Similarly, increased demand for water at a time when there is a reduced supply (in dry periods) may necessitate greater restrictions than currently applies in the peak of summer as is the case in Akaroa and which may be necessary in other areas over the long term.

An increase in water use also increases the demand on infrastructure e.g. pump stations, and related energy and infrastructure costs.

As waste sent to landfill increases, this will necessitate a requirement for new areas for landfill, which will potentially lead to adverse effects on natural and physical resources and reduces what is a finite resource. A reduction in waste sent to landfill can reduce the effect on the land resource to ensure it is managed for future generations.

It is considered appropriate in achieving the purpose of the Act that the use of resources is managed to minimise negative effects and to provide for future generations.

#### SIGNIFICANCE

The proposal to include resource efficiency standards in the proposed District Plan supports Council's and the community's expectation of a quality built environment, which is able to respond to the effects of climate change.

The effects of the provisions will be most significant on landowners and developers of land in industrial zones. The provisions will result in an increase to building cost associated with these developments but these costs will be off-set in the medium term by benefits including:

- Reduced energy costs
- Reduced costs of waste disposal
- Employee productivity and health
- Increased building value

Note, these benefits are yet to be quantified.

As the proposal is new to the city, the significance of the change is considered to be high.

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### STRATEGIC CONTEXT

Chapter 6 of the CRPS provides a framework within which resource efficiency provisions are appropriate and therefore not inconsistent. The following excerpts are particularly relevant -

1. *Objective 6.2.1 Recovery framework:*

*Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:*

...

*(6) maintains or improves the quantity and quality of water in groundwater aquifers and surface water bodies, and quality of ambient air; (underlining is my emphasis)*

2. *Objective 6.2.3 – Sustainability*

*Recovery and rebuilding is undertaken in Greater Christchurch that:*

...

*(5) is healthy, environmentally sustainable, functionally efficient, and prosperous. (underlining is my emphasis)*

3. *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:*

...

*(5) Business development adopts appropriate urban design qualities in order to retain business, attract investment and provide for healthy working environments.*

The Strategic Directions chapter has two relevant objectives as follows -

#### Strategic Directions chapter

3.6.1 *Objective - Recovery and long-term future of the district.*

*The recovery and development of Christchurch as a dynamic and internationally competitive city with...*

*v. a distinctive identity and quality urban environment that is attractive to business, residents and visitors*

*vii. revitalised communities where people enjoy a high quality of life*

*viii. long-term sustainable and efficient use of resources, including those that contribute to the wellbeing of manawhenua.*

3.6.2 *Objective - Development form and function*

*a. An integrated pattern of development and well-functioning urban form that: ...*

*vii. improves energy efficiency and provides for renewable energy and use*

### CONSULTATION

The Energy Efficiency Conservation Authority and New Zealand Green Building Council have both been consulted on proposals and have provided input to the drafting of the provisions. Awareness will be raised through communication with the business community and stakeholders on the proposed provisions as part of the District Plan review process.

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PROPOSAL

PROVISIONS (POLICY, RULE, METHOD) MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES	
<p>Relevant objectives: STRATEGIC DIRECTIONS chapter 3.6.1 Objective - Recovery and long-term future of the district a. <i>The recovery and development of Christchurch as a dynamic and internationally competitive city with...</i> v. <i>a distinctive identity and quality urban environment that is attractive to business, residents and visitors</i> vii. <i>revitalised communities where people enjoy a high quality of life</i> viii. <i>long-term sustainable and efficient use of resources, including those that contribute to the wellbeing of manawhenua.</i></p> <p>3.6.2 Objective - Development form and function a. <i>An integrated pattern of development and well-functioning urban form that...</i> vii. <i>improves energy efficiency and provides for renewable energy and use</i></p>	
Provision(s) most appropriate	Effectiveness and Efficiency
<p>Option 1 Require new buildings to meet energy and water efficiency standards in the District Plan higher than the Building Code</p>	<p><b>EFFECTIVENESS</b></p> <p>Option 1 is consistent with Part 2 of the Act. As described earlier, the way a building is designed and constructed directly impacts on the use of physical and natural resources and associated with this, its effects on the environment. A more sustainable building will use less water and energy and generate less waste. At an individual scale, this generates significant benefits for the occupants and owners of a building. At a larger spatial scale, these efficiencies contribute to the sustainable management of natural resources as well as promoting social and economic well-being.</p> <p>Having regard to section 7 of the RMA, the provisions provide for the efficient use and development of resources (7b), recognising that energy and water are finite resources (7g) and support the efficient end use of energy (section 7(ba) of the RMA).</p> <p>The draft provisions seek to achieve a balance by not imposing significant costs on a developer while ensuring new buildings are to a higher standard. In effect, compliance with the standards will limit effects on the environment and will contribute to the sustainable management of resources.</p> <p><b>Building Act v District Plan</b></p> <p>The Building Act is aimed more at addressing structural, and health and safety matters rather than environmental performance (with the exception of the insulation standards) of new buildings. The proposals for the District Plan address aspects of a building's design which relates directly to environmental performance (inclusive of economic and social performance) and therefore do not conflict with requirements of the Building Act. Although more onerous, the purpose of these provisions can be directly linked to the purpose of the RMA.</p>

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The outcomes sought by the proposals are clearly aimed at ensuring that new buildings of a medium to large-scale minimise environmental effects and maximise social and economic efficiencies. Therefore it is addressing a different purpose than the requirements of the Building Act.

In ensuring the provisions are reasonable and not onerous, rules for smaller developments are limited to metering, controls (on lighting; heating, ventilation and air conditioning (HVAC)) and differentiation between spaces within a building. For larger buildings, the standards are greater but generally reflect MBIE guidelines and other existing documents, familiar to professionals in the industry.

### EFFICIENCY

#### Benefits

Benefits are associated with reduced environmental effects. Buildings will be designed to run more efficiently and indoor environments will provide for a higher standard of amenity and health.

#### Benefits include

- energy saving
- water saving
- improvements in productivity and health
- increased asset value
- increased market value
- higher rental premium

#### Other less tangible benefits include -

- reduced energy consumption
- reduced water use
- reduced waste sent to landfill and cleanfill, placing less pressure on the land resource, one that is finite
- potential for growth in emerging businesses related to resource efficiency

Benefits of the provisions to society can include improvements in the quality of life, health, and well-being. These benefits can be realised at different scales – buildings, the community, and society in general. At a building scale benefits relate to health, comfort, and satisfaction.

#### Costs

Capital costs for offices in industrial zones that meet the standards are anticipated to be greater than compliance with the Building Code. The payback period to recover these costs is to be determined but initial estimates suggest 5 – 10 years.

Along with the capital costs, the following indirect costs are noted:

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	<ul style="list-style-type: none"> <li>• An increased emphasis on resource efficient design may change the way buildings are constructed and this may generate increased costs as the buildings techniques are normalised.</li> <li>• The introduction of new regulation may generate resistance from the development industry, particularly if it is not subsidised or incentivised. In the short term this may cause disruption as the development industry re-adjusts to the new requirements.</li> <li>• There is a need to raise awareness of the new provisions to ensure understanding amongst the development industry.</li> <li>• For the standards to be more successful, they should not stand alone. It will need commitment from Council through supporting policies and programmes.</li> </ul>
Options less or not as appropriate to achieve the objectives and policies:	
<p>Non-regulatory</p> <ul style="list-style-type: none"> <li>- Education</li> <li>- Target Sustainability services (Voluntary)</li> <li>- EECA support</li> </ul>	<p>Appropriateness</p> <p>Non-regulatory methods including education are only partially effective as they rely on an audience that is receptive to ideas and the concepts being promoted. Those that are willing to change their behaviour or adopt new ideas will find the information/advice beneficial and benefit if they adopt measures in building design and construction.</p> <p>Incentives/funding, as is provided under the Council's Target Sustainability services together with EECA support for commercial building designs, can increase the likelihood of energy, water efficiency and waste reduction measures being adopted. However, this is a cost for Council in terms of financial resources.</p> <p>Non-regulatory methods can be difficult to monitor and require funding to measure outcomes. To achieve widespread change with resource efficient commercial buildings requires regulation with a component of education.</p> <p>Non-regulatory methods alone are not therefore considered to be the most appropriate method of achieving the proposed objectives and policies.</p>
Risk of Acting or Not Acting	
<p>There is a need for further information on the costs and benefits of the proposed provisions as well as an understanding of impacts on the recovery and rebuild of the city. The proposal is therefore subject to a better understanding of these matters.</p> <p>Notwithstanding this, the risk of not acting is that:</p> <ul style="list-style-type: none"> <li>(a) An opportunity is lost to achieve greater levels of resource efficiency in the rebuild of the city.</li> <li>(b) The energy and water use in new buildings may continue to be ineffective in achieving significant savings in energy and water savings.</li> <li>(c) Objectives in the Strategic Directions chapter and CRPS will not be met.</li> </ul>	

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### 1.10 EVALUATION – POLICY RECOGNITION FOR THE INLAND PORT

#### ISSUE

The LURP identifies the strategic importance of the Port and associated freight logistics network for greater Christchurch as a priority matter.

The strategic importance of the Inland Port to the operation of the regionally significant infrastructure activity of the Lyttelton Port and the different nature of this activity relative to other industrial activities is considered to warrant specific recognition in the Plan.

This includes making the regional significance of enabling the operation of the Inland Port clear, and also to ensure other adjacent activities are suitable neighbours for such an activity.

#### STRATEGIC CONTEXT

In a strategic context, the LURP provides a clear direction to ensure that strategic infrastructure is enabled for recovery purposes.

The Statement of Expectations in Schedule 4 of the Order in Council<sup>3</sup> also seeks to ensure 'sufficient and suitable development capacity and land for industrial activities' (clause (e) of schedule 4).

#### Basis for proposing a specific policy

The area is subject to a combination of zoning of Industrial General and Industrial Heavy. As the operational requirements may trigger need for assessment for elements of its activity, ensuring there is a suitable and supportive Policy basis is important in terms of RMA assessment.

#### EVALUATION

The methods for including provisions in the District Plan are evaluated below while ensuring such options are not inconsistent with the LURP.

PROVISIONS (POLICY, RULE, METHOD) <u>MOST APPROPRIATE WAY TO ACHIEVE THE OBJECTIVES</u>	
Relevant objectives: Objective 1 (Option 1) The recovery and economic growth of the district's industry are supported and strengthened in existing and new greenfield industrial zones.	
Provision(s) most appropriate	Effectiveness and Efficiency
Option 1: Include a Policy specifically for the Inland Port operation.	<p>2. EFFECTIVENESS</p> <p>This Option would provide clarity as to the Policy basis for support of the Inland Port.</p> <p>3. EFFICIENCY</p> <p>Benefits</p> <ul style="list-style-type: none"> <li>• Provides certainty on future use of the land</li> </ul>

<sup>3</sup> Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014



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	<ul style="list-style-type: none"> <li>• Recognises the importance of the inland port, providing for economic growth and employment</li> <li>• Enables the efficient operation and development of the inland</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>• Owners adjoining the Inland Port are likely to experience higher activity levels which may or may impact their operations.</li> <li>• There are not considered to be additional costs borne by developers/ landowners from the proposed approach</li> </ul>
Reasonably practicable options less or not as appropriate to achieve the objectives and policies:	
Option 2: Provide a non-specific Policy regarding strategic infrastructure	<p>Appropriateness</p> <p>Effectiveness</p> <p>This option is likely to provide a lesser degree of clarity as to the Policy basis for the Inland Port operation.</p> <p>Benefits</p> <ul style="list-style-type: none"> <li>• Signals that the area is suitable for strategic infrastructure development.</li> <li>• Enables a more positive basis for RMA assessment than having no Policy.</li> </ul> <p>Costs</p> <ul style="list-style-type: none"> <li>• May cause uncertainty for landowners as to what activities may establish.</li> </ul>
Risk of Acting or Not Acting	
<p>The Greater Christchurch Transport Statement and technical reports have been prepared to inform the judgements as to the strategic significance of ensuring an Inland Port can operate efficiently on an on-going basis. It is considered that the risk of not acting (RMA s 32(4)(b)) outweighs that of providing a Policy to address provision of an Inland Port.</p>	