

Date of Response	Topic	Question	Response
17-Aug-22	Coastal Hazards	<p><i>Would it be possible to get Tom Logan's contacts? Is there anyone else that might be good to invite to a community meeting, if I organise one with a focus on climate /environmental issues in the ward? I was hoping to make this meeting relatively youth focused (get Avonside/Shirley students along).</i></p> <p><i>Would it be possible to get briefing document / summary of key points about the Niwa Sand budget and how this has been incorporated into the recent CHA (aware this may not be possible, due to workload) and or/other key points.</i></p> <p><i>Darel mentioned that there was a talk coming up somewhere around the peninsula (I believe) and that there might be some useful resources I could share from that? (I heard Derek is a speaker?)</i></p> <p><i>Finally, I am giving a talk at the WEA this Friday on the subject of "a discussion about climate change and other local issues". I wondered if you might have any education resources I might use/borrow from?</i></p>	Please see attached PDF
22-Aug-22	Rates	<p><i>What would be the average rates income received by Council from \$300 million of residential rates?</i></p> <p><i>What would be the average rates income received by Council from \$300 million of commercial rates?</i></p> <p><i>Approximate amounts will be fine.</i></p>	Please see attached PDF

17-Aug-22	Smart Bins (Phillipstown)	<p><i>I know our parks team are part way through a program of replacing park bins with new smart bins. I know the first wave has been deployed and staff are assessing demand for additional bins based on user feedback and requests.</i></p> <p><i>I wanted to submit a request I have had from three residents for bins at Olliviers Reserve and Philips Reserve in Phillipstown. It's worth me mentioning in the past I have similar requests for bins at the Richmond Playground.</i></p>	<p>The additional smart bins have already been installed in parks and reserves which required further litter provision beyond what was previously provided. However parks staff have met representatives of the Phillipstown Community Hub regarding maintenance and potential upgrades at Cross (Phillips) Reserve. These upgrades include a pathway, the playground, signage, and tree lifting and pruning to open up sight lines to prevent antisocial</p>
23-Aug-22	Managing Industrial Activities	<p><i>Candidate request to share memo on Managing Industrial Activities in the District Plan.</i></p>	<p>Please see attached PDF</p>

Coastal Hazards

Your questions below relate to your proposed workshop and so with regard to the election period conventions I can only point you to some factual information:

- Speakers – Dr Tom Logan is someone who is involved in climate adaptation work and is an engaging and progressive voice in that space – but he is not a coastal scientist and was not involved in the Coastal Hazards Assessment and so he is not an expert on the NIWA report and so should not be put forward on that issue specifically (Tom.logan@canterbury.ac.nz) In the youth space you could try Gen Zero perhaps? I think its Sian Carvell (Future Curious) that you are thinking of in the teaching adaptation and climate change space – while you could approach her, she is a Council contractor and we would not be able to fund her time for this purpose. Sian tends to focus on working directly with young people and I'm not sure of her level of comfort in speaking in a public meeting like this.
- Key points about the NIWA sand budget and how it was integrated into the Coastal Hazards Assessment:
 - The [Coastal Hazards Assessment for Christchurch District Technical Report](#) (2021) has a section on Sediment Supply (pp16-18) which references the NIWA work and perhaps the most useful statement to note is that “The study assesses the impacts of future sand budget on beach volumes and shoreline position and concludes that at least until 2120, the city shore sand budget should remain in surplus except under the RCP8.5M climate change scenario.”
 - This is also referenced in the [Coastal Hazards Assessment for Christchurch District Summary Report](#) (2021) in plain language in the A3 ‘area specific summary pages – see p.17 for Brooklands Lagoon to Bottle Lake and p.18 Waimari Beach to Southshore Spit. In both of the top right hand ‘Overall hazard context’ summaries there is commentary about the short, medium and long term erosion rates based on the NIWA sand budget reports being integrated into the Coastal Hazards Assessments.
 - The video on “Coastal hazards Brooklands to Southshore” <https://www.ccc.govt.nz/environment/coast/adapting-to-coastal-hazards/coastalhazards/how-we-assess-coastal-hazards/> is a great visual resource to potentially play – it has Derek Todd explaining these processes in a way that's v engaging.

Lastly the [Coastal Hazards Online Portal](#) has a function that allows people to consider different sediment supply information – see the drop-down “Long-term coastal processes” on the right hand side of the ‘erosion’ tab.

Amount of Rates per Household

The amount of rates charged to \$300 M of property will depend on characteristics of the properties. For example, the number of properties, as some rates are a set amount per property.

On our website, the 2022/2023 Rates page has examples of rates for standard and business may vary with capital value. <https://www.ccc.govt.nz/services/rates-and-valuations/setting-rates-and-valuations/this-years-rates/>

For reference, please find the tables for Standard and Business below.

Extrapolating these examples for a capital value of \$300 M:

- For the average home
 - Capital value of \$508,608 and annual rates of \$3,113
 - Equates to 590 properties with **annual rates of \$1,836,188**
- For the average business
 - Capital value of \$1,858,572 and annual rates of \$14,604
 - Equates to 161 properties with **annual rates of \$2,357,294**

Standard

We assume this ratepayer pays the following rates: General Standard, Uniform Annual General Charge, Water Connected, Land Drainage, Sewerage, Waste Minimisation, Active Travel, Heritage (Cathedral) and Heritage (Arts Centre).

Capital value \$	2022/2023 rates (\$, incl GST)
200,000	1,443
400,000	2,525
500,000	3,066
508,608 (average home)	3,113
600,000	3,607
700,000	4,148
800,000	4,689
1,000,000	5,771
1,500,000	8,476

Business

We assume this ratepayer pays the following rates: General Business, Uniform Annual General Charge, Water Connected, Land Drainage, Sewerage, Waste Minimisation, Active Travel, Heritage (Cathedral) and Heritage (Arts Centre).

Capital value \$	2022/2023 rates (\$ incl GST)
200,000	1,894
400,000	3,426
600,000	4,959
800,000	6,492
1,000,000	8,024
1,500,000	11,856
1,858,572 (average business)	14,604
2,000,000	15,688
5,000,000	38,677

Memo

Date: 22 September 2021
From: Mark Stevenson, Team Leader – City Planning
To: Mayor and Councillors
Cc: Jane Davis, General Manager Infrastructure, Planning and Regulatory Services; David Griffiths, Head of Planning and Strategic Transport
Reference: 21/1305274

Managing industrial activities in the District Plan

1. Purpose of this advice

- 1.1 The purpose of this advice is to respond to a resolution of the Finance and Performance Committee on the 26th August 2021 that the Committee “Request staff advice on options to improve consenting requirements/district planning provisions in regards metal recycling and dumping yards to the Urban Design and Transport Committee rather than just a memo”. This follows a councillor raising this matter during deliberations on the Long Term Plan.

2. Executive summary

- 2.1 This advice is in response to a resolution for staff to provide advice on options for how the District Plan manages metal recycling and dump yards, arising from concerns about the impacts of these activities on residential areas.
- 2.2 Council has a responsibility under the Resource Management Act to control the effects of the use and development of land and in doing so, requires resource consent for heavy industrial activities in the Industrial Heavy zone and sets standards for noise and visual amenity e.g. requirements for landscaping and the screening of outdoor storage areas, amongst other matters.
- 2.3 Options are presented in this advice of requiring resource consent for metal recycling and dump yards in any industrial zone, or requiring additional standards for these activities e.g. increased setbacks from adjoining boundaries. A preliminary planning assessment identifies that neither option would be the most appropriate way to achieve those objectives and has costs that may outweigh any benefits. The Council would therefore need a fuller assessment of the merits and appropriateness of a Plan Change before having a reasonable basis to resolve to prepare one.

3. Context

- 3.1 Concerns have previously been raised by the community regarding the effects of industrial activities on residential neighbours and how the interface between industrial and residential zones is managed. Council staff have previously provided advice to Councillor Johanson on this including a memo investigating whether the Christchurch District Plan’s rules are effective in achieving the intended outcome (**Attachment 1**). The advice below summarises what has been provided previously while also assessing the options for a change to the District Plan to manage the effects of metal recycling and dump yards specifically.

Statutory context

- 3.2 Council has a function under Section 31 of the Resource Management Act 1991 to control any actual or potential effects of the use, development, or protection of land. Under section 7, the Council in managing the use and development of natural and physical resources, is to have particular regard to the efficient and development of resources, including land, the maintenance and enhancement of amenity values and also of the environment.
- 3.3 The Christchurch District Plan, required under the RMA, seeks to manage the effects of land use activities, by defining objectives (outcomes of what is sought), and policies and methods (rules) for achieving those objectives.
- 3.4 The relevant objectives of the District Plan concerned with managing the effects of industrial activities include:
 - 3.4.1 Controlling the location of activities, primarily by zoning, to minimise conflicts between incompatible activities where there may be significant adverse effects on the health, safety and amenity of people and communities (Objective 3.3.14 – Incompatible activities).
 - 3.4.2 Managing adverse noise effects on the amenity values and health of people and communities so that the noise levels are consistent with the anticipated outcomes for the receiving environment (Objective 6.1.2.1 Adverse noise effects).
 - 3.4.3 Limiting the sound level, location and duration of noisy activities in order to manage adverse noise effects (Policy 6.1.2.1.1 Managing noise effects).
 - 3.4.4 Managing the adverse effects on industrial activities, while recognising that sites adjoining an industrial zone will not have the same level of amenity as other areas with the same zoning (Objective 16.2.3 Effects of industrial activities).
 - 3.4.5 Recognising that the level of residential amenity in residential areas that adjoin industrial zones may be of a lower level than other residential areas (Policy 16.2.3.2(b) Managing effects on the environment).
- 3.5 Additionally, Policy 16.2.1.3 (Range of industrial zones) outlines the requirement to recognise and provide for industrial zones with different functions that cater for a range of industrial and other compatible activities depending on their needs and effects:
 - 3.5.1 Industrial General Zone - Recognise and provide for industrial and other compatible activities that can operate in close proximity to more sensitive zones due to the nature and limited effects of activities including noise, odour, and traffic, providing a buffer between residential areas and the Industrial Heavy Zone.
 - 3.5.2 Industrial Heavy Zone - Recognise and provide for a full range of industrial and other compatible activities that generate potentially significant effects, including relatively high levels of noise, odour, heavy traffic movements, and the presence of significant amounts of hazardous substances, necessitating separation from more sensitive activities.
 - 3.5.3 Industrial Park Zone - Recognise and provide for industrial activities in the high technology sector and other industries in a high amenity environment dominated by open space and landscaping, and that generate higher volumes of traffic than other industries while having negligible effects in terms of noise, odour or the use and storage of hazardous substances.
- 3.6 In the rules of the District Plan, activities are identified as being permitted or requiring resource consent, including industrial activities. Metal recycling and dumping yards are not

specifically identified and fall within the definition of **Industrial activity** unless there is a discharge of odour or dust beyond the boundary and/or burning of waste in which case, it becomes a **Heavy Industrial activity**.

- 3.7 **Industrial activities** are permitted in the Industrial General and Industrial Heavy zones while **Heavy Industrial activities** are Discretionary in the Industrial General zone and Permitted in the Industrial Heavy zone. This is subject to compliance with standards in the District Plan¹. Some of the standards that apply to industrial activities control noise and visual amenity e.g. requirements for landscaping and the screening of outdoor storage areas. Discharges to air are dealt with through regional plan rules. Any breaches of these standards require a resource consent, and any known breaches without resource consent would be subject to an enforcement assessment by the compliance unit.
- 3.8 While the District Plan objectives and policies recognise that residential areas adjoining industrial zones may have a lower level of residential amenity, Council staff conducted an investigation to determine the effectiveness of the rules in 2019 as explained in Attachment 1 (Memo to Office of the Chief Executive dated 10 December 2019). These investigations found 12 complaints received between 19 January 2017 and 23 April 2019. The issues identified were primarily related to noise (clanging of metal and droning of machines) while visual amenity, rubbish blowing into residential properties and dust were each also mentioned on at least one occasion. The complaints related to noise resulted in Environmental Health Officers attending the site and undertaking noise measurements, which indicated that in some instances there were breaches of the District Plan noise limits.
- 3.9 The nuisance issues of noise and dust identified from monitoring are not the result of ineffective District Plan provisions. There were attributed to non-compliance with existing rules on noise or are managed by ECan under the regional plan (with regard to discharges to air).

4. Options

- 4.1 The following options have been identified for amending the District Plan.
- 4.2 **Option 1: Staff initiate a plan change to require resource consent for metal recycling and dumping yards**
 - 4.2.1 Staff could initiate a plan change to require resource consent as a Restricted Discretionary, Discretionary or Non-complying activity for metal recycling and dumping yards in any industrial zone. This would enable an assessment on a case by case basis.
 - 4.2.2 Council would be able to initiate that process only if the Council, with planning advice, was satisfied that those rules would better achieve the objectives of the District Plan than do the current rules.
 - 4.2.3 The advantages and disadvantages of this option described below also indicate a preliminary planning staff view that they would not support this change to the District Plan:
 - 4.2.4 Advantages
 - a. It would enable an assessment of any proposed metal recycling or dumping yards on a case by case basis, and controls to be put on such activities by conditions of resource consent.

¹ Even if the activity complies with District Plan rules and operates as a permitted activity, resource consent may also be required under regional plans.

- b. This option may be more consistent with Objective 3.3.14 of the District Plan by managing the effects of activities so that “Conflicts between incompatible activities are avoided where there may be significant adverse effects on the health, safety and amenity of people and communities”.

4.2.5 Disadvantages

- c. A requirement for resource consent for metal recycling and dumping yards in industrial zones is less consistent (compared to the status quo) with objective 3.3.2 of the District Plan, which seeks that reliance on resource consent processes are minimised. It is also not as consistent as the status quo with objectives 3.3.5 and 16.2.1 of the District Plan of recognising the critical importance of business, supporting economic growth and to provide a range of opportunities for business activities to establish and prosper. By requiring resource consent, it would not facilitate these uses in locations intended for industrial activities.
- d. It is unlikely to change the outcomes, having regard to existing controls on noise and visual amenity amongst other matters under the District Plan, and air discharge, including dust and odour, under the regional plan.
- e. It is inconsistent with the function of industrial zones to provide for industrial activities. To require resource consent for some types of industrial activities would not reflect the anticipated outcomes for industrial zones, nor the existing use of these areas.
- f. The effects such activities may be comparable to other types of industrial activities that are deemed appropriate e.g. panel beaters in terms of noise.
- g. It would result in additional transaction costs for applicants, which may not be necessary, particularly on sites some distance from more sensitive activities.
- h. Any plan change will take time to prepare and progress through the process. If challenged, it could be a drawn out process, during which time, metal recycling and dumping yards could be established.

4.3 **Option 2: Staff initiate a plan change to require additional standards for metal recycling and dumping yards**

4.3.1 Additional standards could be introduced that are specific to metal recycling and dumping yards, including larger setbacks, limits on the height of any storage and requirements for screening.

4.3.2 Council would be able to initiate that process only if the Council, with planning advice, was satisfied that those rules would better achieve the objectives of the District Plan than do the current rules.

4.3.3 The advantages and disadvantages of this option described below also indicate a preliminary planning staff view that they would not support this change to the District Plan:

4.3.4 Advantages

- a. This option may be more consistent with Objective 3.3.14 of the District Plan by managing the effects of activities so that “Conflicts between incompatible activities are avoided where there may be significant adverse effects on the health, safety and amenity of people and communities”.

4.3.5 Disadvantages

- b. The introduction of additional standards for metal recycling and dumping yards in industrial zones would be less consistent (compared to the status quo) with objective 3.3.2 of the District Plan, which seeks that the number, extent and prescriptiveness of development controls is minimised. It is not as consistent as the status quo with objectives 3.3.5 and 16.2.1 of the District Plan of recognising the critical importance of business, supporting economic growth and to provide a range of opportunities for business activities to establish and prosper. By introducing additional standards, it would not facilitate these uses in locations intended for industrial activities.
 - c. It is unlikely to change the outcomes, having regard to existing controls on noise and visual amenity amongst other matters under the District Plan, and air discharge, including dust and odour, under the regional plan.
 - d. The effects such activities may be comparable to other types of industrial activities that are not subject to additional standards e.g. panel beaters in terms of noise.
 - e. It would result in additional transaction costs for applicants, which may not be necessary, particularly on sites some distance from more sensitive activities.
 - f. Any plan change will take time to prepare and progress through the process. If challenged, it could be a drawn out process, during which time, metal recycling and dumping yards could be established.
- 4.4 The Council can notify a proposed change to the District Plan only if it reasonably believes that the proposed change is the most appropriate way to achieve the objectives of the District Plan (s32(1)(b)). The preliminary planning assessment above identifies that neither option would be the most appropriate way to achieve those objectives and has costs that may outweigh any benefits. The Council would therefore need a fuller assessment of the merits and appropriateness of a Plan Change before having a reasonable basis to resolve to prepare one.
- 4.5 Central government intends to replace the RMA with new legislation before the end of 2022. This could have implications for management of land use activities. Staff will at that time provide advice to the Council about possible resultant changes to the District Plan.

5. Conclusion

- 5.1 Industrial activities, including but not limited to 'metal recycling and dumping yards', can have adverse effects. The District Plan manages the effects of industrial activities through a range of methods including:
- 5.1.1 Built form standards for building heights, setbacks, outdoor storage, landscaping, visual amenity and screening requirements including at boundaries between zones
 - 5.1.2 Requiring resource consent for heavy industrial activities in industrial zones that adjoin residential areas
 - 5.1.3 General rules in the District Plan that manage noise and lighting effects from activities by placing limitations on the noise/ light levels received at the boundary of adjoining zones. These standards are to be complied with regardless of the activity or its location relative to the site or zone boundary.
- 5.2 The Council's compliance staff continue to work with residents and businesses to ensure that District Plan standards are not being breached, and in the instances where they are, that appropriate enforcement action is taken.
- 5.3 As explained above, a change to the district plan to either require resource consent for metal recycling and dump yards or require additional standards for these activities are not

considered appropriate, however planning staff will continue to monitor the effectiveness of the District Plan. Should the Council deem it appropriate, a fuller assessment of the merits and appropriateness of a Plan Change could be undertaken to inform any decision.

Attachments Ngā Tāpirihanga

No.	Title	Page
A	Memo on effects of activities in industrial zones, December 2019	

Signatories Ngā Kaiwaitohu

Author	Mark Stevenson - Team Leader City Planning
Approved By	Brent Pizzey - Senior Legal Counsel David Griffiths - Head of Planning & Strategic Transport Jane Davis - General Manager Infrastructure, Planning & Regulatory Services

PREVIEW

Strategy and Transformation Group Memo

Date: 10 December 2019

From: Alison Outram, Policy Planner - City Planning; and Mark Stevenson, Team Leader – City Planning

To: Office of the Chief Executive

Effects of industrial activities on the adjoining residential zone

Introduction

This memo has been prepared as a response to concerns raised regarding the interface between industrial and residential zones, and follows discussions at the Council meeting of 19th December 2018. Matters raised at the meeting related specifically to an area of industrial zoning in Woolston, which is adjacent to land zoned residential. The Linwood-Central-Heathcote Community Board had previously requested information about the activity in the area, and this was supplied to the Board in a memo dated March 2019.

Starting in early 2019, a period of information gathering and monitoring took place. This was followed by analysis and gathering further information to enable a better understanding of the emerging issues, which has culminated in the preparation of this memo.

Purpose

The purpose of this report is to investigate whether the Christchurch District Plan rules, for managing the effects of industrial activities on adjoining residential zones, are having their intended outcome. While it is recognised through District Plan objectives and policies that residential areas adjoining industrial zones may have a lower level of residential amenity, an investigation was undertaken to determine the effectiveness of the rules. I.e. are the rules working as intended and are any complaints isolated incidents, or are the rules not having the desired effect and subsequently causing widespread complaints.

Strategic Context

The Resource Management Act 1991 (RMA) sets out the role of Regional Councils and Territorial Authorities (city and district councils) in Sections 30 and 31. Amongst other things, city and district councils are responsible for managing the effects of land use activities including noise, while regional councils are responsible for managing discharges of contaminants (including odours) into or onto land, air, or water.

The RMA also requires territorial authorities to have a district plan to manage the effects of the use, development, or protection of land and associated natural and physical resources of the district. This is the purpose of the Christchurch District Plan, which seeks to manage the effects of land use activities using zoning to define different objectives/outcomes, policies and rules, including the activities anticipated to occur in each zone. The relevant objectives and policies of the District Plan concerned with managing effects include:

- Controlling the location of activities, primarily by zoning, to minimise conflicts between incompatible activities where there may be significant adverse effects on the health, safety and amenity of people and communities (Objective 3.3.14 – Incompatible activities).

- Managing adverse noise effects on the amenity values and health of people and communities so that the noise levels are consistent with the anticipated outcomes for the receiving environment (Objective 6.1.2.1 Adverse noise effects).
- Limiting the sound level, location and duration of noisy activities in order to manage adverse noise effects (Policy 6.1.2.1.1 Managing noise effects).
- Managing the adverse effects on industrial activities, while recognising that sites adjoining an industrial zone will not have the same level of amenity as other areas with the same zoning (Objective 16.2.3 Effects of industrial activities).
- Recognising that the level of residential amenity in residential areas that adjoin industrial zones may be of a lower level than other residential areas (Policy 16.2.3.2(b) Managing effects on the environment).

Additionally, Policy 16.2.1.3 (Range of industrial zones) outlines the requirement to recognise and provide for industrial zones with different functions that cater for a range of industrial and other compatible activities depending on their needs and effects (see Table 1).

Table 1. Functions of different industrial zones (as per Policy 16.2.1.3, Christchurch District Plan)

Christchurch District Plan Zone	Function	Equivalent zoning under the Christchurch City Plan*
Industrial General Zone	Recognise and provide for industrial and other compatible activities that can operate in close proximity to more sensitive zones due to the nature and limited effects of activities including noise, odour, and traffic, providing a buffer between residential areas and the Industrial Heavy Zone.	B3, B4, B8
Industrial Heavy Zone	Recognise and provide for a full range of industrial and other compatible activities that generate potentially significant effects, including relatively high levels of noise, odour, heavy traffic movements, and the presence of significant amounts of hazardous substances, necessitating separation from more sensitive activities.	B5, B6
Industrial Park Zone ¹	Recognise and provide for industrial activities in the high technology sector and other industries in a high amenity environment dominated by open space and landscaping, and that generate higher volumes of traffic than other industries while having negligible effects in terms of noise, odour or the use and storage of hazardous substances.	B4T, B7

*There are some exceptions to these zoning changes.

Table 2 indicates the types of activities that may occur in the Industrial General Zone or Industrial Heavy Zone, and Table 3 outlines the built form standards² that apply to the zones. A range of activities are permitted across the industrial zones, however there are also rules that apply in regards to building height, setbacks from boundaries, recession planes, outdoor storage, landscaping, visual amenity and screening. In some cases, there are site-specific rules that apply to sites, reflecting the agreed outcomes of a previous plan change to the City Plan.

Table 2. Permitted activities in Industrial General and Industrial Heavy Zones (some may have activity specific standards)

Activity	Industrial General Zone	Industrial Heavy Zone
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¹ The Industrial Park Zone (IP Zone) has not been considered in this report as the IP Zone requires greater landscaping, open space and higher amenity than the Industrial General and Industrial Heavy Zones.

² See District Plan Chapter 16.4 and 16.5 for more detail.

Industrial activity	Y	Y
Heavy Industrial activity	N	Y
Warehousing and distribution activities	Y	Y
High technology industrial activity	Y	Y
Service industry	Y	Y
Trade and industry training activity	Y	Y
Ancillary retail activity	Y	Y
Retail activity on the Tannery site	Y	N
Food and beverage outlet	Y	Y
Trade supplier	Y	N
Yard-based supplier	Y	N
Service station	Y	Y
Second-hand goods outlets	Y	N
Ancillary office	Y	Y
Public transport facility	Y	Y
Emergency service facilities	Y	Y
Gymnasium	Y	Y
Preschool	Y	N
Parking lots / Parking building	Y	Y
Community corrections facility	Y	Y
Poultry hatchery	N	Y
Bulk fuel supply infrastructure	N	Y

Table 3. Built form standards for Industrial General and Industrial Heavy Zones

	Industrial General Zone	Industrial Heavy Zone
Maximum height for buildings	The maximum height of any building within 20 metres of a residential zone shall be 15 metres.	
Minimum building setback from road boundaries / railway	3 metres when opposite a residential zone	
Minimum building setback from the boundary with a residential zone	3 metres	3 metres (except for sites adjoining the residential zone at Wigram where there is no minimum setback)
Sunlight and outlook at boundary with a residential zone and road	Where an internal site boundary adjoins a residential zone, no part of any building shall project beyond a building envelope contained by a recession plane measured at any point 2.3 metres above the internal boundary in accordance with the relevant diagram in Appendix 16.8.11 of the District Plan (other site specific rules may apply)	
Outdoor storage of materials	Shall not be located within the minimum setbacks Shall be screened by landscaping, fencing or other screening to a minimum of 1.8m in height from any adjoining residential zone	
Landscaped areas	Road frontage opposite a residential zone shall have a landscaping strip with a minimum width of 1.5m and a minimum of 1 tree for every 10m of road frontage or part thereof. On sites adjoining a residential zone, trees shall be planted adjacent to the shared boundary at a ratio of at least 1 tree per 10m of boundary or part thereof	
Visual amenity and screening	If adjoining a Specific Purpose (School) Zone (or various other specific purpose zones or open space zone), provision shall be	Provision shall be made for landscaping and screening if adjoining certain specific

	made for landscaping and screening.	purpose zones (excludes school zone) or Open Space Zone.
There are additional area-specific rules for Waterloo Park, Portlink Industrial Park, Musgroves, North Belfast, Stanleys Road, Trents Road, South West Hornby, Sir James Wattie Drive, South West Hornby and Springs Road.		

In addition to the zone rules, there are rules in the District Plan that manage noise effects from activities by placing limitations on the sound level received at the boundary of adjoining zones (see excerpt below of Rule 6.1.5.2.1 in the Christchurch District Plan, 'Zone noise limits outside the Central City'). These noise standards are to be complied with regardless of the activity or its location relative to the site or zone boundary.

Zone of site receiving noise from the activity	Time (hrs)	Noise Limit (dB)	
		L_AEg	L_Amax
a. All residential zones (other than in the Accommodation and Community Facilities Overlay)	07:00-22:00	50	n/a
b. ...	22:00-07:00	40	n/a

Note that regardless of the setbacks and landscaping required by the District Plan, compliance with the noise limits specified above is required.

In summary, the Industrial General Zone (IG Zone) provides for activities that can operate in close proximity to more sensitive zones (such as residential zones) due to the limited effects of noise, odour and traffic from this zone. Due to the more limited nature of activities that can occur in the IG Zone, the zone also acts as a buffer between these sensitive zones and the Industrial Heavy Zone (IH Zone). The IH Zone provides for a greater range of industrial activities that may generate high levels of noise, odour and traffic movements, and may potentially involve the presence of large amounts of hazardous substances (see Appendix A for the definitions of 'industrial activity' and 'heavy industrial activity').

Regardless of compliance with the District Plan provisions, Section 16 of the RMA says that it is the responsibility of every occupier of land to avoid unreasonable noise and that they should adopt the best practicable option to ensure that noise emission does not exceed a reasonable level.

Effectiveness of the District Plan

To understand the effectiveness of the current District Plan rules related to industrial activities (general or heavy) at the interface between residential and industrial zones, information was obtained from other Council units about the number and type of complaints that had been received from residential areas about industrial zones/activities. (See Appendix B for the map showing the interface that was considered).

Complaints were sourced from the Regulatory Compliance Unit, Citizen and Customer Services Unit and the Office of the Chief Executive for the period between 1st December 2016 and 20th March 2019³. A large number of complaints were outside the scope of this project as they related to residential activities, festivals, lime scooters, refuse collection, call centre wait time or traffic light phasing. However, 57 complaints were identified as being of relevance and they assist in understanding whether or not the District Plan is operating effectively at the interface between residential and industrial areas.

³ This time period was used as the replacement District Plan rules became operative in December 2016, and the 20th March 2019 was the date when queries were made of the various Council units.

Site Assessment

Of the 57 complaints, the majority have their origin in four industrial areas: Belfast (14), Woolston (12), Bromley (10) and Hornby South (9). The remaining industrial areas have between 0 and 3 recorded complaints for the time period used in this research.

Table 4. Number of complaints about industrial activities from adjacent residential zones

Industrial Area	Number of complaints*	Type			
		Noise**	Dust	Odour	Other
Belfast	14	14			
Woolston	12	11	1		2 x Visual 1 x Vibration 1 x Rubbish leaving site
Bromley	10	2		6	1 x Rubbish leaving site 1 x Unspecified
Hornby South	9	8	2		
Northcote	3	2	1		1 x Visual
Lyttelton	2	2			
Phillipstown	2	2			
Waterloo Business Park	2	2			
Wigram/Middleton	2	1			1 x Rubbish leaving site
Sydenham/Waltham	1	1			
Addington	0				
Harewood North	0				
Harewood South	0				
Hornby	0				
Templeton	0				
Wainoni	0				
Total	57	45	4	6	8
*Note that some complaints may relate to more than one type of adverse effect, therefore the complaints detailed in 'Type' may add to a number greater than that shown in 'Number of complaints'.					
**Noise complaints relate to daytime operating hours as well as complaints relating to late night or very early morning disturbances.					

Key findings

Complaints are concentrated in four industrial areas – Belfast, Woolston, Bromley and Hornby South. In Bromley, complaints are about odour from the composting facility, while complaints in other areas (Belfast, Woolston and Hornby South) relate to noise originating from the use of machinery (droning, site scraping, trucks and forklifts), banging and clanging of metal, and the moving of containers.

Further analysis of the complaints at each location follows.

Belfast

The main type of complaint in this industrial area is noise. Ten complaints (originating from adjoining residential zones) are related to the cutting of aluminium at 26 Belfast Road (Fairview Concepts), three complaints are related to noise from 20 Station Road, and one complaint was about noise occurring near Factory Road / the railway tracks.

Contact was made with the managing director of Fairview Concepts shortly after the complaint in March 2018, and the noise issue appears to be resolved through an agreement that the workshop door should not be left open while aluminium cutting was underway. The managing director advised that there would be a weekly reminder to staff about the need to keep the workshop door shut while cutting aluminium.

In regards to the noise complaints originating from the Cloud Ocean water bottling plant at 20 Station Road, compliance officers investigated the complaints and requested that Cloud Ocean cease any night time activities and provide an acoustic report that demonstrates compliance with the District Plan.



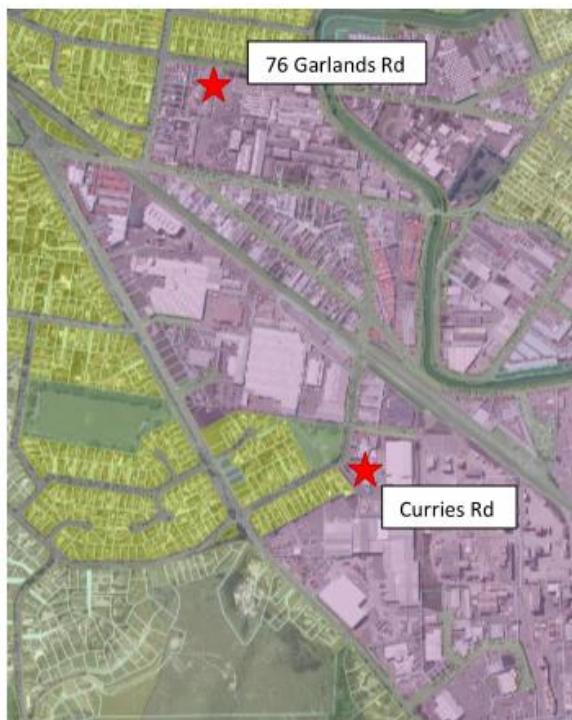
Source of complaints identified with a red star symbol.

After some delays, the necessary documents for a resource consent application were provided, and resource consent was granted. Although the plant is not currently operating (as of the 30 August 2019), emails to compliance staff indicate that the plant will be operational at the start of 2020. To address noise concerns, a noise barrier is being constructed, and regular noise monitoring is a condition of the resource consent (monthly, then six-monthly, then annually).

Date	Location	Detail
22/02/2017	26 Belfast Road	Noise from cutting of aluminium
18/04/2017	26 Belfast Road	Noise from cutting aluminium
21/04/2017	26 Belfast Road	Noise from cutting aluminium
14/09/2017	26 Belfast Road	Noise from cutting saw
29/01/2018	26 Belfast Road	Noise from aluminium cutting tool
01/02/2018	26 Belfast Road	Excessive noise from cutting aluminium
02/02/2018	26 Belfast Road	Noise from cutting aluminium
07/02/2018	20 Station Road	Noise coming from the plant at night
23/02/2018	Near Factory Road / Railway tracks	Loud droning noise, unsure of source - freezing works or bottling plant
15/03/2018	26 Belfast Road	Loud noise coming from the property
19/03/2018	26 Belfast Road	Noise from cutting sheet metal
23/03/2018	26 Belfast Road	Noise from cutting aluminium
02/10/2018	20 Station Road	Banging and clattering noise, trucks beeping throughout the night. Residents woken up multiple times during the night / early hours of the morning
09/10/2018	20 Station Road	Noise at all hours

Woolston

Most of the complaints (originating from adjoining residential zones) in Woolston are about noise as a result of the activities at 76 Garlands Road (the former Skellerup site). After Skellerup relocated to Wigram, the site has been occupied by National Steel and used for car crushing activities. The car crushing activity is considered to be an industrial activity, and therefore a permitted activity in the Industrial General zone, meaning it can operate without resource consent, provided it complies with the applicable standards in the District Plan⁴. Investigations by the compliance team have concluded that the activity is generally operating within the required noise limits, although there have been some breaches of noise limits (between 0.7dB and 1.5dB). Advice from the compliance team is that monitoring of the site is ongoing to ensure the activity complies with the standards in the District Plan.



Source of complaints identified with a red star symbol.

It should also be noted that the car crushing activity is a temporary use of the site, and that the site is being prepared for another activity. The temporary nature of the car crushing activity at its current location is unlikely to warrant any action in the form of a plan change, however stricter enforcement action could be taken for any, even minor, breaches of District Plan rules.

Date	Location	Detail
19/01/2017	Curries Road	Noise at Curries Road from trucks unloading containers, forklifts beeping (only quiet between 1am and 5am)
16/08/2017	Woolston (no specific location)	Email about dust issues in Woolston
02/03/2018	Garlands Road	Constant droaning and the sound of crushing metal at Garlands Road - happens frequently through the day
02/03/2018	Garlands Road	Noise and mess at Garlands Road
06/03/2018	76 Garlands Road	Noise and vibration
07/03/2018	76 Garlands Road	Noise - clanging of metal, droning of machines
12/02/2018	76 Garlands Road	Noise throughout the day
22/03/2018	76 Garlands Road	Ongoing noise - banging and clanging
12/12/2018	Garlands Road	Noise (extended hours), visual intrusion (views from their homes) and pollution (rubbish blowing onto residential properties) from Garlands Road
01/04/2019	76 Garlands Road	Machinery noise
12/04/2019	76 Garlands Road	Scraping noise - using a car as a broom in front of a forklift to sweep up debris
23/04/2019	76 Garlands Road	Noise from using forklift with a car on it to scrape yard

⁴ Even if the activity complies with District Plan rules and operates as a permitted activity, resource consent may also be required under regional plans.

Hornby South

The main source of complaints (originating from adjoining residential zones) in this industrial area relate to noise from trucks operating and noise from the loading and unloading of containers. There are also two complaints related to dust.

The noise complaints appear to occur during night time hours (for the records where a time of day is mentioned). This could be due to background noise being less during the night time, which can contribute to a greater effect of any noise from industrial sites i.e. sounding louder, and/or could be that the activities in question are exceeding the noise limits for the zone.



Source of complaints identified with a red star symbol.

However, emails from compliance staff indicate that noise monitoring has been carried out at 121 Branston Street and 80 Shands Road on several occasions, and the results were that the activities complied with noise limits.

Compliance records for 34 Branston Street only show communications with the compliance team about building warrants of fitness, and there does not appear to have been any recorded compliance or enforcement action related to 716 Halswell Junction Road. However, it should be noted that there was only one complaint allocated to each of these addresses.

Date	Location	Detail
17/01/2017	Container Transport & Storage Yard	Excessive noise from operation of Container Transport & Storage
19/01/2017	121 Branston Street	Noise from trucks (all night)
25/01/2017	121 Branston Street	Noise, hours of operation, dust
02/02/2017	121 Branston Street	Dust from exposed ground at Container Transport and Storage
22/08/2017	121 Branston Street	Loud crashing and banging noises from moving containers at this property. During the night and on Sundays
04/12/2017	80 Shands Road	Loading and unloading of containers prior to 7am
31/05/2018	121 Branston Street	Noise 24/7 from forklifts, really carries at night
10/09/2018	716 Halswell Junction Road	Excessive industrial noise from property
25/10/2018	34 Branston Street	Trucks loading and unloading containers from 9pm onwards

Bromley

In Bromley, the main source of complaints (from the residential area [REDACTED] approx. 1km away) are odour related and identify the Living Earth or the EcoDrop facility as the source. It should be noted that these activities and the residential zone are all longstanding rather than new activities, and can rely on existing use rights.

As the main complaint is to do with odour, it is generally a matter for Environment Canterbury, rather than the Christchurch City Council. However, the City Council and Environment Canterbury are working together on a project called 'Bromley Offensive and Objectionable Odours', and this includes joint investigations, community impact assessments, monitoring and mitigation processes.



Source of complaints identified with a red star symbol.

The 2018/19 Annual Report from Living Earth to Council indicates that the actual number of complaints is much greater than those reported to the City Council, as the report also includes complaints made via the Environment Canterbury pollution hotline and to Living Earth directly. It should be noted that Living Earth has made various improvements to their operations⁵ over time, and the overall number of complaints is decreasing year on year (shown in the table below).

CCC FY Year	F14/15	F15/16	F16/17	F17/18	F18/19	Change prev yr
Days of complaints	115	132	104	91	64	-30%
Number of complaints	227	286	178	165	92	-44%

These operational improvements and the joint project are to assist the operations at Living Earth to comply with their resource consent from Environment Canterbury⁶, in which one of the consent conditions requires no odour to cross the site boundary. There is also a resource consent from the City Council, however the matters covered by this are high traffic generation, site coverage and encroachment into a setback distance.

Date	Location	Detail
09/05/2017	Living Earth	Odour complaint
27/12/2018	Metro Place rubbish dump	Odour
30/12/2018	Living Earth	Odour from composting facility
17/01/2019	Metro Place EcoDrop	Strong rubbish smell
04/02/2019	Metro Place EcoDrop	Complaint about the ecodrop (no further info)
11/02/2019	Living Earth	Odour
13/03/2019	Metro Place EcoDrop	Terrible odour
18/03/2019	Berms outside Metro Place EcoDrop	Concern about plastic and glass on the berms at the Metro Place EcoDrop. This is then being mowed over, making it easier for the material to enter the environment.
09/05/2017	Living Earth	Odour complaint

⁵ Memorandum to Elected Members from the City Services Group, dated 18 May 2017, re. Organics Processing Plant.

⁶ Resource consent number CRC080301.1

Conclusion

It can be concluded that outdoor activities appear to be the main source of noise complaints. This is either where the activity is physically taking place outdoors or where operator's behaviour/conduct results in noise from internal machinery being able to be heard outdoors (i.e. through the opening of doors/windows).

If noise complaints persist, the recommendation is for further noise monitoring to assess whether or not noise limits are being breached. It should be noted that nuisance noise is not always captured through noise monitoring because of the manner in which noise is measured (as an average over 15 minute intervals). However, the reporting of noise incidents is vital as Council staff keep records of incidents and can work with business operators to ensure that they are meeting their duties under Section 16 of the RMA (avoiding unreasonable noise and adopting the best practicable option to ensure that noise emission does not exceed a reasonable level).

Where noise complaints are made, Council staff will continue working with business operators to ensure that they are aware of their duties and District Plan noise limits, and to identify opportunities for business operators to minimise their impact on their residential neighbours. Methods to manage effects will vary on a site by site, and may include moving an activity indoors (where possible), ensuring doors or windows are closed when noisy activity is taking place or through better landscaping / screening provision that may assist in reducing how sound carries.

From the information available, there is not an issue necessitating changes to the Christchurch District Plan, however planning staff will continue to monitor the effectiveness of the District Plan through liaising with compliance staff.

Appendix A – Definitions

Heavy industrial activity	<p>means:</p> <ul style="list-style-type: none"> a. blood or offal treating; bone boiling or crushing; dag crushing; fellmongering; fish cleaning or curing; gut scraping and treating; and tallow melting; b. flax pulping; flock manufacture or teasing of textile materials for any purpose; and wood pulping; c. storage and disposal of sewage, septic tank sludge or refuse; d. slaughtering of animals; storage, drying or preserving of bones, hides, hoofs or skins; tanning; and wool scouring; e. the burning of waste oil in the open air or in any combustion processes involving fuel-burning equipment; f. any other processes involving fuel-burning equipment, which individually or in combination with other equipment, have a fuel-burning rate of up to 1000 kg/hr; g. the open burning of coated or covered metal cable or wire, including metal coated or covered with varnish, lacquers, plastic or rubber; h. any activity with the potential to discharge asbestos to air, including the removal or disposal of friable asbestos, except where it complies with the Health and Safety in Employment (Asbestos) Regulations 1998 and is supervised and monitored by Occupational Safety and Health staff; i. burning out of the residual content of metal containers used for the transport or storage of chemicals; j. the burning of municipal, commercial or industrial wastes, whether by open fire or the use of incinerators for disposal of waste; k. any industrial wood pulp process in which wood or other cellulose material is cooked with chemical solutions to dissolve lining, and the associated processes of bleaching and chemical and by-product recovery; l. crematoriums; and m. any industrial activity which involves the discharge of odour or dust beyond the site boundary.
Industrial activity	<p>means the use of land and/or buildings for manufacturing, fabricating, processing, repairing, assembly, packaging, wholesaling or storage of products. It excludes high technology industrial activity, mining exploration, quarrying activity, aggregates-processing activity and heavy industrial activity.</p>

Appendix B – Map

