

Response ID ANON-URZ4-5FKU-G

Submitted to Fast-track approval applications
Submitted on 2024-05-03 17:05:47

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
Carter Group Limited

2 Contact person

Contact person name:
Tim Carter

3 What is your job title

Job title:
Project Director

4 What is your contact email address?

Email:
s 9(2)(a)

5 What is your phone number?

Phone number:
s 9(2)(a)

6 What is your postal address?

Postal address:

Level 2, ASB House, The Crossing, 166 Cashel Street, Christchurch 8011

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

The site is generally located at 104 Ryans Road, Harewood, Christchurch 8042. The site/location relates to an approximately 55.5 hectare parcel of land on the north side of Ryans Road, adjacent to Christchurch International Airport. The land is legally described as Pt Lot 3 DP 22679, Lot 4 DP 22679 and Pt Lot 1 DP 2837 and is currently zoned and used for rural purposes.

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Do you have a current copy of the relevant Record(s) of Title?

Yes

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Who are the registered legal land owner(s)?

Please write your answer here:

John Bowden Mackintosh and Matthew Chadlow Hall

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

The applicant has a signed contract to purchase the property from the registered land owner(s). This contract is conditional on the applicant obtaining the necessary approvals for the project. This condition is solely for the benefit of the applicant and therefore for all intents and purposes, the contract is not conditional on any other matter outside the applicant's control. The applicant does not see any other barriers to the transfer of the title and has every intention of completing the purchase once the relevant approvals are obtained. No third party finance is required for the acquisition of this property or for the completion of the works proposed by this project.

Section 2: Project details

What is the project name?

Please write your answer here:

Ryans Road Industrial Development

What is the project summary?

Please write your answer here:

To provide for a regionally significant industrial development of approximately 55 hectares of land in Harewood, adjacent to Christchurch International Airport.

What are the project details?

Please write your answer here:

Purpose: The purpose of this project is to develop an industrial zone that meets the specific demands for industrial land in the immediate vicinity of and in association with Christchurch International Airport. This includes providing land suitable for the establishment logistics, warehousing, light manufacturing, and other airport-related businesses. The purpose includes delivering significant regional economic benefit. During construction it will sustain the employment equivalence of 1,800 workers working for one year and contribute \$220 million to the region's GDP. Once operational, it will contribute \$316 million to the region's GDP annually.

Objectives: The objectives include:

- Providing additional industrial land supply to meet growing demands for general and airport-related industrial land in this location.
- Creating job opportunities and stimulating economic growth.
- Ensuring compatibility with the adjacent airport operations.

Activities: The project activities primarily involve subdivision and land development to create the specified industrial sites and associated infrastructure development, including roads, utilities, and other necessary facilities. This would facilitate subsequent development activity, including the construction of industrial buildings and facilities and the implementation of landscaping and environmental management measures.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

The project is ready to proceed immediately after receiving the relevant approvals and would likely be completed as a single stage of development.

The applicant has all of the relevant titles under contract to purchase and has funds reserved and set aside for the development of this project and requires no external or bank funding. The applicant is ready to commence development immediately after obtaining the required approvals.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource consents under the Resource Management Act 1991.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Christchurch City Council and Canterbury Regional Council (Environment Canterbury)

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

No other applications (or decisions) for a resource consent or a notice of requirement have been made in relation to the project.

Is approval required for the project by someone other than the applicant?

Yes

Please explain your answer here:

Standard approvals would be required from Christchurch City Council in regards infrastructure connections.

Approval from Christchurch International Airport Limited would be required under section 176 of the Resource Management Act for the use of that part of the subject land that is designated for airport purposes.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

The applicant is ready to commence development immediately after obtaining the required approvals.

Detailed Design: Detailed design will start immediately on approval(s) and is anticipated to take 6-8 months.

Procurement: Contractor tendering and engagement anticipated to take 1 month.

Funding: The applicant has funds reserved and set aside for the development of this project and requires no external or bank funding.

Site Works Commencement: Will commence three months following relevant approvals being obtained.

Site and Subdivision works completion: 8 months from site works commencing, with titles to likely to be issued 4 months following completion of stage.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Persons likely to be affected by the project include:

- Christchurch City Council and Canterbury Regional Council (as the relevant local authorities)
- Christchurch International Airport Limited (as requiring authority with a designation over part of the subject land).
- Te Ngāi Tūāhuriri as the relevant iwi authority.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

The land is subject to a contract to purchase and consultation is commencing immediately with all of the parties above. In particular, consultation will be occurring with Christchurch Airport to ensure the project is well connected to and supportive of the growth of the Christchurch International Airport.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

Not applicable.

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The Ngāi Tahu Claims Settlement Act 1998 applies to the geographical region within which the project is located. However, there are no statutory acknowledgement areas relevant to, or affected by this project. The Act is aimed at redressing historical grievances of the Ngāi Tahu iwi against the Crown. In summary, its key principles and provisions include:

1. Apology: The Act includes an apology from the Crown to Ngāi Tahu for historical breaches of the Treaty of Waitangi and for other injustices suffered by Ngāi Tahu.
2. Redress: Ngāi Tahu received financial and non-financial redress as compensation for past grievances. This includes monetary settlements, the transfer of Crown-owned land, and the establishment of cultural, environmental, and economic initiatives to benefit Ngāi Tahu.
3. Cultural Redress: The Act recognizes Ngāi Tahu's cultural, spiritual, and historical connection to certain areas of land and natural resources. It provides for the return of specific culturally significant sites and the protection of customary rights.
4. Governance: The Act establishes mechanisms for the representation and participation of Ngāi Tahu in the management of natural resources, conservation areas, and other matters affecting the iwi's interests. This includes the creation of entities such as Te Rūnanga o Ngāi Tahu to oversee the iwi's affairs.
5. Co-Management: It promotes co-management arrangements between Ngāi Tahu and government agencies for the management of conservation lands, fisheries, and other natural resources within Ngāi Tahu's traditional territory.
6. Settlement Process: The Act outlines the process for negotiating and implementing the settlement, including mechanisms for dispute resolution and the establishment of a historical account of Ngāi Tahu's grievances.
7. Future Relations: The Act aims to establish a framework for ongoing cooperation and partnership between Ngāi Tahu and the Crown, recognizing the importance of building a positive relationship based on mutual respect and understanding.

The land is not subject to any culturally significant features or items as identified in relevant planning documents. However, Mahaanui Kurataiao Limited as the agency providing advice on behalf of Te Ngāi Tūāhuriri as the (relevant iwi authority) will be consulted in regards the project, in order to obtain guidance in regards the construction of the proposed development, and embedding cultural expression and narrative to leave enduring cultural markers beyond the period of development.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

N/A

Upload your assessment if necessary:

No file uploaded

Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

The anticipated effects of the project on the environment are summarised below:

Economic effects: The project will have regionally significant economic benefits. An independent economic consultancy (Market Economics) has concluded the project will have a one off total construction effect of \$220m into the Christchurch economy and an operational effect of \$316m annually into the Christchurch economy. In broader terms, economic benefits will arise in the form of additional employment, income and expenditure generated by the proposal, including increased economies of scale, increased competition, and reduced unemployment and underemployment. The project will also increase competition and choice in industrial land markets (particularly in the vicinity of the airport, where there is a scarcity of freehold land) in a manner that is strongly and directly consistent with the NPS-UD. No significant economic costs (adverse effects) are anticipated to arise. (See attached expert reports by Market Economics and Bayleys).

Infrastructure: Any adverse effects associated with infrastructure establishment and servicing can be adequately avoided or mitigated. As confirmed through early correspondence with Council staff and advice from civil engineering consultants, servicing capacity (water and wastewater) exists and connections to existing reticulated network infrastructure will be provided and funded by the applicant. Stormwater can be readily managed on the site. Power and communications infrastructure is already readily available in this locality. (See attached expert report by Inovo).

Natural hazards and contaminated land: The land is not susceptible to any significant flood hazard risks (including coastal or climate induced flood hazards) and has good geotechnical characteristics such that any adverse effects associated with natural hazards and/or contaminated land can be adequately avoided or mitigated.

Transport: The project can be readily accommodated by the existing road network, noting its frontage to an interconnected network of local roading and close proximity to the arterial and State Highway network. Aside from local roading and site access works and improvement, no significant road improvement works are anticipated. Notably, the Council's Draft LTP for 2024-34 has proposed \$7.7m for the Pound and Ryans Road Corridor Improvements between 2024/25-2030/31 and this is understood to make provision for a new roundabout at the Ryans Road/ Pound Road intersection, for which preliminary design work has been completed by Council. Other intersection upgrades in the vicinity are not anticipated, noting especially that the SH1/Ryans Road intersection provides for left in/out movements only and a deceleration lane on the approach to this intersection is already provided on SH1. In summary, the project can be readily accommodated by the surrounding road network and no adverse transport effects of significance are anticipated.

Landscape and visual effects and amenity values: Effects on broader amenity values are considered to be less than minor and consistent with those already experienced in association with the airport and its established industrial areas that adjoin the site. Any adverse effects associated with visual and landscape effects can be adequately avoided or mitigated and there are no significant landscape values on the site or nearby warranting particular management.

Urban design and urban form: The project is adjacent to and effectively integrated with the existing airport precinct and industrial areas. It is considered to provide an appropriate standard of urban design and urban form and deliver a well-functioning urban environment as sought by the NPS-UD such that there are no adverse effects in respect of urban design and form.

Ecological effects: There are no features of significant ecological or natural value on the subject land and therefore no effects in this regard are anticipated.

Reverse sensitivity: Given the project does not provide for noise sensitive or other sensitive activities, the project will be compatible with the airport, established industrial businesses and rural activities in the immediate area. There are no residential zones in the vicinity of the site. No reverse sensitivity effects are anticipated.

Loss of agricultural production: The site is currently zoned Rural Urban Fringe within the District Plan and under the land use capability classifications the land includes LUC class 2 soils. However, the current landowners have advised that limited cropping activity is possible on the site due to the associated birdstrike risks to the airport. Whilst the proposal will result in some loss of versatile soil, this is concluded to be acceptable given the relative importance of providing sufficient business land to meet the 'locality and market' specific demands for airport related industrial land.

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Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

The National Policy Statement on Urban Development 2020 (NPS-UD) is of particular relevance and the project strongly aligns with the national direction set in this document.

The site and existing airport precinct is within the Greater Christchurch "urban environment" and enabling a 55 hectare industrial subdivision for activities that include those directly related to or dependent on the airport will 'add significantly to development capacity' given the shortage of freehold industrial land in this location.

The NPS-UD provides a clear and intentional shift on how urban development around New Zealand is dealt with. While there is still some uncertainty in Canterbury around how this applies against the Regional Policy Statement which has not yet been updated to reflect the shift reflected in the NPS-UD, the directions in the NPS-UD are clear and are directly promoted by this project, as detailed below.

Objective 1 focuses on creating well-functioning urban environments to support social, economic, and cultural wellbeing, as well as health and safety. The project supports this objective by delivering a well-functioning urban environment through the provision of industrial capacity, which enhances industrial supply and choice (particularly in association with Christchurch International Airport), thereby supporting economic wellbeing.

Objective 2 seeks to improve industrial affordability by fostering competitive land and development markets. The project addresses constraints in the industrial land supply market, increases supply and competition, and contributes to industrial affordability in the vicinity of the airport and for Greater Christchurch generally.

Objective 3 aims to enable more businesses to operate in areas with employment opportunities, good transport links, and high industrial demand. The project strongly supports this, insofar as providing for industrial growth alongside the airport (an existing employment centre), and has good accessibility to existing transport networks, including State Highway 1.

Objective 4 emphasizes that urban environments should evolve over time to meet the changing needs of communities. The project is seen as a response to evolving industrial needs, consistent with this objective.

Objective 6 seeks decisions to be integrated with infrastructure planning and funding, strategic over the medium to long term, and responsive to proposals supplying significant development capacity. The project meets these criteria, despite potential tension between responsiveness and strategic planning.

Objective 8 emphasizes the importance of urban environments supporting reductions in greenhouse gas emissions and being resilient to climate change. The project supports this through its proximity to the airport and associated transport efficiencies for airport-related industry establishing in this location rather than more distant alternatives. The subject site is otherwise resilient to climate change effects, such as sea-level rise and increased rainfall.

Additionally, the NPS-UD policies further support the project and its alignment with the objectives, particularly in terms of providing diverse industrial options, supporting businesses, ensuring accessibility, promoting competition in land markets, and addressing climate change resilience. In regards to development capacity, the project will deliver additional capacity in the short, medium and long term for freehold industrial land immediately adjacent Christchurch International Airport.

Overall, the project contributes positively to well-functioning urban environments and addresses key objectives and policies outlined in the NPS-UD.

The subject land has LUC Class 2 soils (highly productive land or 'HPL') and therefore the NPS for Highly Productive Land (NPSHPL) is potentially relevant. The proposal is consistent with the NPSHPL and clause 3.6 concerning the urban rezoning of land, on the basis that:

1. The rezoning is required to provide sufficient development capacity to meet the specific demands for freehold industrial land adjoining and in association with Christchurch International Airport.
2. There are no other reasonably practicable and feasible options to provide this development capacity within the same locality and market (i.e. adjacent to the airport) in a way that achieves a well-functioning urban environment on less productive land.
3. The benefits of rezoning outweigh the costs, noting the significant benefits of enabling airport-related industry to establish directly adjacent the airport generally, the significant economic benefits assessed by Market Economics, and otherwise noting that the land has limited scope for productive use given cropping (with associated birdstrike risk) is inappropriate alongside the airport.

Given the particulars of the land and the project, the following NPS are not relevant: the New Zealand Coastal Policy Statement, NPS for Renewable Electricity Generation 2011, NPS for Electricity Transmission 2008, NPS for Greenhouse Gases from Industrial Process Heat 2023, NPS for Freshwater Management 2020 or the NPS for Indigenous Biodiversity 2023.

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Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

Fast-tracking this project would enable construction of the project to commence as soon as possible once approvals are received, potentially in late 2024.

If this project is unsuccessful in this fast-tracking application, the timing of the commencement is less certain and unlikely to occur for many years following a likely long, costly and protracted process through the CRPS review and appeals, subsequent district change processes to rezone the land, and subdivision consent applications.

The slow speed, high cost and uncertainty associated with these conventional planning processes is a significant deterrent to investors, has opportunity costs (from not enabling development and business activity in the interim) and has arguably contributed to the current shortage of freehold industrial

land in the vicinity of the airport. The applicant needs more certainty at an earlier stage than the other processes can offer in order to be able to make certain decisions and investments in relation to the project.

The Fast-Track Approvals Bill 2024 was introduced with a specific purpose to provide a streamlined decision-making process that facilitates the delivery of infrastructure and development projects with significant regional or national benefits. Essentially, it aims to expedite approvals for projects that contribute to the overall well-being and growth of communities.

The project would align with this purpose in the following key ways:

1. Accelerated Commencement: Fast-tracking would enable the project to commence in late 2024. Without fast-tracking, the project is unlikely to start until around 2030 due to the time-consuming conventional planning processes.
2. Investor Attraction: The slow speed, high cost, and uncertainty associated with conventional planning processes can deter investors. Fast-tracking provides more certainty at an earlier stage, making the project more attractive to investors.
3. Opportunity Cost Reduction: Fast-tracking reduces opportunity costs associated with delays. Enabling development and business activity sooner, captures opportunities that would otherwise be lost or delayed whilst awaiting the conclusion of lengthy planning processes.
4. Addressing Industrial Land Shortage: The project directly addresses the current shortage of freehold industrial land in the vicinity of the airport. Fast-tracking would allow this issue to be addressed more quickly.
5. Supporting Christchurch International Airport Growth: The project supports the growth and development of Christchurch International Airport and related industry. Fast-tracking would accelerate the benefits this growth brings to the region.
6. Economic Growth and Job Creation: The project will stimulate economic growth and create jobs, both during construction and through the subsequent establishment of business activity. Fast-tracking would bring these benefits to the community sooner.

In summary, fast-tracking this project would accelerate its benefits, attract investors, reduce opportunity costs, address industrial land shortage, support airport growth, and stimulate economic development and job creation.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

Referring this project to the fast-track process under the Fast Track Approvals Bill 2024 is unlikely to negatively impact the efficient operation of the process for several reasons:

1. Alignment with the Bill's Purpose: The project aligns well with the purpose of the Bill, which is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. This alignment means that the project is exactly the type of initiative the fast-track process was designed to handle.
2. Clear Objectives and Scope: The project's objectives are well-defined: deliver 55 hectares of freehold industrial land that is well connected to and supportive of Christchurch International Airport and associated industry. Clarity in project scope ensures that decision-makers can assess its merits efficiently without unnecessary delays.
3. Efficient Use of Resources: By fast-tracking a project that is ready to commence and has clear regional benefits, the decision-making body can focus its resources on projects that are ready to proceed, rather than spending time on projects that are not yet ready or do not align with the Bill's purpose.
4. Maintaining Momentum: Fast-tracking this project could help maintain the momentum of the fast-track process, demonstrating its effectiveness and reinforcing its purpose. This could boost the confidence of stakeholders in the process, leading to its more widespread adoption and ultimately improving its efficiency.

In summary, referring this project supports the efficient operation of the fast-track process, insofar that it strikes a balance between speed and thoroughness, aligns with the bill's purpose, and delivers regionally and nationally significant benefits by addressing a shortfall in freehold industrial land alongside and supportive of Christchurch International Airport.

Has the project been identified as a priority project in a:

Other

Please explain your answer here:

Greater Christchurch Spatial Plan - As is addressed later in this application, the project aligns with the Greater Christchurch Spatial Plan (adopted in March 2024 by all Partner Councils, including Christchurch City Council and Environment Canterbury), insofar that this area of land south, and adjacent to the airport is identified as a 'new/expanded industrial area', is adjacent to the existing urban area, and is within the indicative green belt for Christchurch City.

Christchurch International Airport planning – through the Our Space regional planning process CIAL expressly sought provision for more industrial land between the runway and Ryans Road (encompassing the subject site). It noted that Christchurch Airport is a major employer and economic hub, second only to the Central Business District. It generates substantial economic benefits, with employment largely driven by operational and logistics operations, alongside ancillary activities. Further, the airport is recognised in all relevant statutory planning documents as regionally significant 'strategic infrastructure', that plays a crucial role in connecting the region, nation, and world, fostering trade and movement of goods and people. The airport employs approximately 6,000 people and serves as a transport hub for thousands daily. Its total economic impact on the Canterbury Region was an estimated \$2.6 billion in GDP in 2017, accounting for 7.6% of the regional economy and 8.5% of regional employment. The businesses at the airport, including engineering, logistics, wholesaling, and professional services, are unique compared to traditional industrial areas of Greater Christchurch. CIAL noted the airport is a distinct 'industrial market', with significant uptake of land for freight and warehousing. Therefore, CIAL asserted that future industrial land use in the Ryans Road area was necessary to cater to growing demand for airport-related sectors, deliver unique locational benefits and

meet specific industrial land demands that other parts of the city could not address. The project squarely aligns with the Airport's submission in this regard.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

As described above, Christchurch International Airport (inclusive of surrounding business land) is identified as regionally and nationally significant (strategic) infrastructure.

The project, located adjacent to the airport, is poised to deliver infrastructure of significant regional and national importance in several ways:

1. Industrial Land Development: The project addresses a critical need for airport-specific industrial land. By developing this land, the project will facilitate the growth of industries that are vital to the region and the nation.
2. Supporting Airport Growth: The project supports the growth and development of Christchurch International Airport, a key transport hub for thousands of people daily. This support enhances the airport's capacity to connect the region with the rest of the nation and the world.
3. Economic Impact: The project is expected to stimulate economic growth and create jobs, both during construction and through the subsequent establishment of business activity. This aligns with the national goal of economic development and job creation.
4. Specialised Infrastructure: The project will develop infrastructure that caters to highly specialised sectors such as logistics, Antarctic operations, and engine maintenance and development. This specialised infrastructure is not only unique but also crucial to the functioning of these sectors at a regional and national level.
5. Freight and Warehousing: The project will provide for future industrial land use for freight and warehousing, sectors that are essential for the movement of goods at a regional and national level.

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

The project will contribute to well-functioning urban environments in the following ways:

1. Variety of Sites for Different Business Sectors: The project provides a variety of sites suitable for different business sectors, but particularly those related to airport operations, logistics, and warehousing. The location next to the airport and the availability of different site sizes cater to the specific needs of these sectors.
2. Good Accessibility: The project's location adjacent to, and high degree of connectivity with Christchurch International Airport ensures good accessibility between housing, jobs, retail and community and a key transport hub that provides for both public and active transport. The site is otherwise very well connected to the strategic transport network, noting its proximity to State Highway 73 (Pound Road) and State Highway 1 (Russley Road).
3. Supporting Competitive Operation of Land and Development Markets: By addressing the shortage of freehold industrial land in the vicinity of the airport, the project supports the competitive operation of land and development markets. It also limits adverse impacts by providing more certainty for investors and preventing supply distortion and infrastructure inefficiencies.
4. Supporting Reductions in Greenhouse Gas Emissions: Enabling airport related industry to establish near the airport (rather than in general industrial zones elsewhere in Greater Christchurch), supports transport efficiency and reduced transport related emissions. The project will otherwise reduce both embodied and operational greenhouse gas emissions through subdivision design measures (low impact design) and initiatives promoting energy efficient and low-carbon site development.
5. Resilience to Climate Change: The subject land is resilient, insofar that it is not affected by coastal or other surface flooding risks that may escalate over time due to climate change.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

Regionally (and potentially nationally) significant economic benefits will arise in the form of additional employment, income and expenditure generated by the development and ongoing activity, increased economies of scale, and reduced unemployment and underemployment. The project will also increase supply, competition and choice in the industrial land market (particularly in the vicinity of the airport) in a manner that is strongly and directly consistent with the NPS-UD.

The applicant has engaged an economic expert to provide an estimate of the likely economic benefit that would arise from the project. An economic report has been provided as part of this application, which indicates that the project will:

- Contribute a one-off total construction-related economic benefit of \$220m into the Christchurch economy
- Contribute ongoing operational economic benefits of \$316m annually into the Christchurch economy.
- Have regionally significant economic benefits; and
- Have a range of nationally significant economic benefits that have not been quantified.

The project delivers regionally (and potentially nationally) significant economic benefits in the following ways:

1. Unique Industrial Market: The airport is both nationally and regionally significant and is identified as a unique 'industrial market'. The uptake of airport land for freight and warehousing has been substantial, indicating a strong demand for such spaces.

Nick O'Styke the Director (Industrial) of Bayleys Canterbury advises that:

'Whilst there is some industrial land near the Airport, almost all of that land is owned by Christchurch International Airport Limited (CIAL) and is offered to the market through leasehold arrangements. CIAL does not typically develop industrial land to sell to owner occupiers.

Bayley's has seen a strong demand in the market for industrial land that is able to be owner occupied, as opposed to leased. There is a significant lack of such land in and around the Airport, despite there being clear demand in that location for some time now. Strategically, locating near the Airport is very attractive to industrial land developers who commonly seek to locate in proximity to significant freight and transport hubs.

I consider the approximately 50 hectares of industrial land being proposed on the Site will significantly and positively change the district's industrial land supply, and would result in a significant regional benefit to Canterbury'.

2. Projected Growth: There is a projected growth in demand for land to cater to airport-related industrial sectors such as logistics, warehousing, and manufacturing. This demand is expected to increase across the planning horizon that far exceeds the 30 year horizon in the NPSUD.

3. Economic and Functional Reasons: There are economic and functional reasons for specialist industrial activities associated with freight and logistics to be located near to the airport. These activities require proximity to the airport and in some cases access to the runway, and hence, they will not locate in the city or in other areas away from the airport.

4. NPS-UD Capacity Considerations: The NPS-UD requires careful consideration of the demand for different types and locations of business land, providing for choices that will meet the needs of people and communities and future generations for a range of working environments and places to locate businesses. This proposal specifically responds to a particular demand for a type and location of business land.

5. Avoiding Adverse Impacts: An oversupply of (general) industrial land can lead to dispersal of industrial activity, supply distortion, and infrastructure inefficiencies. The proposed approach does not result in these adverse impacts, given the specific airport-related market and demands that the land will provide for.

Given these factors and the need for airport-specific industrial land use in this area over the short, medium and long (and very long) -term, the proposed project has the potential to deliver significant economic benefits by fostering airport-related growth and meeting the related demands for business land.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

The project supports climate change mitigation through its distance from coastal and low lying areas susceptible to sea-level rise and storm surges and its resilience to heavy rainfall events/frequency.

The project will seek to reduce both embodied and operational greenhouse gas emissions. This will be achieved in a number of ways including:

- Achieving a high degree of connectivity and accessibility, by way of proximity and connections to the strategic roading network and the local road network servicing Christchurch International Airport. This connectivity (and the design of roading to accommodate buses if required) provides the potential for servicing by public transport and otherwise minimises commuter travel.
- Minimising paved areas in the development as much as possible;
- Planting trees and shrubs as part of the development (i.e. enabling carbon sequestration through biological processes).
- Encouraging energy efficient building design, the use of low carbon materials during the building phase (for example through encouraging greater use of timber), and the uptake of solar on buildings through the design of buildings as 'solar ready';

The applicant has engaged a consultant specialising in energy and carbon emissions and will work closely with them to develop the above initiatives further into the detailed design of the project.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

The project site strongly supports resilience from natural hazards. The land is not susceptible to sea-level rise, storm surges or significant flooding risks and is not subject to any other notable natural hazards. Civil engineering advice indicates that the land is generally suitable for industrial development and future land damage from liquefaction or other natural hazards is unlikely.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

There are no significant environment issues applicable to the project.

There are no significant or sensitive natural resources or features on the subject land. The site is immediately adjacent to Christchurch International Airport and its associated industrial business areas, it is well connected to the transport network and the proposed subdivision has a compact and linear urban form that effectively integrates with surrounding land use and roading patterns. The project is a logical form and location for urban development.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

The project is consistent with the Greater Christchurch Spatial Plan that was adopted in March 2024 by all Partner Councils (Christchurch City Council, Selwyn District Council, Waimakariri District Council and Environment Canterbury).

Specifically, the project site is identified in the general area identified as a 'new/expanded industrial area' (purple shading in the attached extract of the Greater Christchurch Spatial Plan), is adjacent to the existing urban area (grey shaded in the attached extract of the Greater Christchurch Spatial Plan) and is within the indicative green belt (green dashed arrow in the attached extract of the Greater Christchurch Spatial Plan).

As noted earlier, the project is also consistent with the Spatial Plan's direction regarding "Growth in appropriate places" insofar that it does not conflict with any sites and areas of significance to Māori, notable environmental areas and features, and strategic infrastructure or any identified areas to avoid or mitigate (being areas vulnerable to a high risk of flooding; areas vulnerable to a medium or high risk of coastal inundation, coastal erosion and tsunami inundation; and areas at risk from rockfall, cliff collapse, mass movement and fault lines). To the extent that the land is subject to Christchurch Groundwater Protection Zone 1 this can be appropriately managed, in the same manner as other established and new areas of industrial development within the western parts of Christchurch. Further, the presence of highly productive land does not reflect the airport-related constraints on productive use of the land or the specific 'locality and market' attributes of the land which warrant its prioritisation for airport-related business use.

The project is not otherwise identified in local or regional planning documents, which predate the Greater Christchurch Spatial Plan.

Anything else?

Please write your answer here:

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

The site is resilient to the likely current and future effects of climate change accounting for its distance from coastal and low-lying areas susceptible to sea-level rise and storm surges and the civil engineering advice received to date confirming the land's resilience to heavy rainfall events/frequency.

The project site is not subject to any notable natural hazards and civil engineering advice indicates that the land is generally suitable for business development and future land damage from liquefaction is unlikely.

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

N/A - There have been no compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill.

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Tim Carter

Important notes