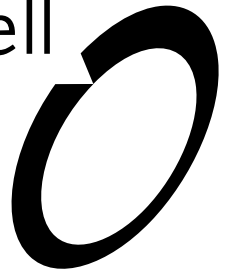


Boffa Miskell





Film Studio Proposal

Planning Assessment

Prepared for Regenerate Christchurch

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1.0 Introduction

This planning assessment provides an analysis of the extent to which the current provisions of the Canterbury Regional Policy Statement (CRPS) and the Christchurch District Plan (CDP) enable the development and operation of commercial film or video production facilities within the Christchurch District, and an assessment of ways in which such enablement can be improved if required.

Utilising a summary of other film production sites within New Zealand (attached as **Appendix 6**), a generic understanding of the characteristics of this type of activity has been developed and the likely effects that such an activity could give rise to have been considered. From this summary it is clear that these activities have attributes that are urban in nature (large buildings, carparking, high vehicle movements), but also other attributes that are not uncommon in a rural context (large sites, significant areas of landscaping, outdoor storage, intermittent noise).

The analysis in **Appendix 4** shows that currently this activity is not provided for explicitly in the CDP as a permanent facility¹. Rather, it would be treated as a discretionary or non-complying activity in most zones throughout Christchurch, with very little (if any) support from objectives and policies.

That “default” activity status adds uncertainty around both the process for pursuing a commercial film production facility (including the potential for an application to be publicly notified) and the possibility of such a proposal being approved. That same uncertainty exists for those advising a possible applicant, including the Council, and the local community and could be a contributing factor in proponents choosing not to pursue a proposal and the opportunity being lost for the region.

The CRPS is generally open to a wide range of activities where effects are appropriately managed but in relation to the rural areas there is a greater restriction on activities with urban qualities. The characteristics of film production facilities would not appear likely to conflict with the outcomes sought by the CRPS but more specific provision for this type of activity could enhance the opportunity for it to be provided for in the CDP and ultimately realised.

To the extent, therefore, that there is a desire to provide a more enabling consenting pathway for such facilities, this report provides a series of recommendations for changes to the CRPS and CDP to better enable this type of development.

Generally, the approach is to utilise the existing definition (Commercial film or video production²) currently in the CDP for temporary filming activity, but to extend the opportunity to permanent facilities in appropriate zones. The current definition suitably fits the general activity, and this keeps referencing simple. The use of the current definition also reflects that the CDP has anticipated this type of activity occurring, albeit in a spatially restricted, and very temporary way. This proposition therefore provides for such an activity being developed and operated on a more permanent basis, in

¹ It is provided for as a temporary activity under very limited circumstances.

² means activities associated with the creation of a film or video product where undertaken by a professional production company. It excludes filming by news organisations, students or private individuals.

appropriate zones, where the effects that would arise are compatible with the outcomes the planning framework is already anticipating.

For clarity, the assumptions underlying this analysis are that film production activity will not be common as it is expected to be a finite proposition in a relatively constrained market, and it does not need to include residential activity which could add to the complexity of effects to consider.

The recommended changes to the CRPS and the CDP to give effect to this proposition, are set out in **Appendices 1-2** to this assessment. Additional analysis of the key planning documents is also included in **Appendices 3-5**.

2.0 Canterbury Regional Policy Statement

In the planning hierarchy the CRPS sits above the District Plan and the CDP must give effect to it. The CRPS sets a direction for resource management for the Canterbury Region and specifically includes a direction for the recovery, regeneration and growth of Greater Christchurch.

2.1 Definitions

Within the Greater Christchurch area, the definitions of 'urban' and 'rural' provide a key but broad differentiator between activities, and direct where different activities are anticipated to occur. In this case, given the characteristics of the activity being considered and the specific amendments recommended to be made to the planning framework, it is not considered necessary or appropriate to determine whether the film production activity is 'rural' or 'urban' under the CRPS definitions. The permanent film production development that is envisaged is possibly more urban in nature but also has attributes not uncommon of some rural based activity. Accordingly, it can be considered to fit appropriately within both types of environment, subject to appropriate management of the effects of the activity. As well as being unnecessary to achieve an acceptable and enabling outcome, amending either of these definitions could potentially undermine the application of these definitions generally within the overall planning framework provided through the CRPS and associated district plans.

There is currently no definition in the CRPS that would directly address this activity and thus it is proposed to introduce a definition of 'commercial film or video production' to align with that used in the CDP and to support the use of this term within the policy framework as set out below.

The definition of 'noise sensitive activities' currently within the CRPS defines the types of activities deemed sensitive to higher noise levels, particularly in relation to the health and wellbeing of people, and includes residential activities, education activities, travellers' accommodation and healthcare. This definition is used to ensure that these activities can be managed or avoided in certain areas where there is potential incompatibility e.g. close to the airport or to arterial roads or the railway lines. Commercial film and video production activities do not share the same characteristics as those activities defined as being noise sensitive in the CRPS. To avoid any doubt, we have proposed to amend the definition of noise sensitive activities to explicitly exclude film production activity. Given that this type of activity currently is not listed as a noise sensitive activity there is no inherent risk in providing this clarification. To further reinforce this, it is also proposed to amend the definition of film production to explicitly exclude residential activity as set out in section 3.1 below.

2.2 Policy direction

As stated above, the CRPS is generally open to enabling a wide range of activities where effects are appropriately managed and where that is consistent with achieving

more strategic goals such as supporting urban consolidation and the integration of land use and infrastructure. In relation to the rural areas of the region the CRPS directs a greater restriction on activities with urban qualities so as to protect rural character and to promote efficiency in infrastructure provision, management of incompatible land uses and accessibility through urban consolidation goals.

A review of the policy direction of the CRPS has been undertaken (see **Appendix 3**) and in our assessment the nature of film production facilities does not conflict generally with the outcomes sought by the CRPS. However, it is accepted that film production activity is less well aligned with the approach to managing rural areas in particular. Consequently, careful consideration needs to be given to any approach that is more enabling of this type of activity in a rural context, and we have been particularly mindful of that inherent tension in formulating our recommendations.

To address this issue within the CRPS it is proposed to amend two key policies:

- policy 6.3.1, to expressly provide for this activity (as was done for the Canterbury Sport Ltd site in Yaldhurst Road); and
- policy 6.3.5, to require that any such development connect to reticulated services to protect the environment; and to clarify that this is not a noise sensitive activity.

2.2.1 Policy 6.3.1

The CRPS provides an explicit direction that new urban activity should only occur in existing urban areas and greenfield priority areas³. These urban and greenfield areas are shown in Map A to the CRPS. However, it does also anticipate in policy 6.3.1 that some urban activity outside these areas can be contemplated and that this can be indicated by such activities being “*expressly provided for in the CRPS*”³. To that extent the CRPS framework already contemplates the possibility of specific exceptions being acceptable without compromising the overall aims of the policy statement.

The approach of providing ‘express provision’ within the CRPS policy framework has been recently applied to the Canterbury Sport Ltd site in Yaldhurst Road, which was similarly introduced into the CRPS and CDP through a proposal under section 71 of the

³ Objective 6.2.1 Recovery framework

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

3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS; ... (emphasis added)

Objective 6.3.1 Development within the Greater Christchurch area

In relation to recovery and rebuilding for Greater Christchurch: ...

4. ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the CRPS; ... (emphasis added)

Greater Christchurch Regeneration Act 2016. That site and activity is expressly provided for in Policy 6.3.1 of the CRPS which states:

Policy 6.3.1 Development within the Greater Christchurch area

In relation to recovery and rebuilding for Greater Christchurch: ...

6. *provide for a metropolitan recreation facility at 466-482 Yaldhurst Road; and ...*

Acknowledging the substantially urban nature of this activity, the same 'exception' approach is proposed to be applied to film production as an activity. This is able to be achieved by referencing the activity specifically in policy 6.3.1 (as was done for the Canterbury Sport Ltd site). The distinction for this proposition from the approach adopted for the Canterbury Sport Ltd site, is that this proposition is not site specific and would be more generally enabling of commercial film or video production activity within suitable contexts. To facilitate that the proposal is to include an additional clause within the policy that states "*provide for commercial film or video production activities in appropriate commercial, industrial and rural zones*".

As stated, this will enable express provision for film production activities in those zones where consideration has been given to the nature of the activity and its compatibility with the 'host' zone, the activities anticipated in those areas, and the environmental outcomes and protections that are already envisaged.

The initial wording contemplated above for the amendment to 6.3.1 provides explicit provision for this activity, but in an open-ended manner that would apply to parts of the three districts within Greater Christchurch. This proposition only contemplates the provision for such activities within the CDP at this time, however the proposed unqualified wording would enable Selwyn and Waimakariri Districts (within Greater Christchurch) to consider if any areas within their jurisdictions are appropriate in the same way as has been considered for Christchurch. However, beyond just introducing that possibility it could be interpreted to in effect require Selwyn and Waimakariri to provide for this activity within comparable appropriate zones in those districts to give effect to the CRPS.

To address this issue, consideration has been given to whether that policy amendment should be specific only to within Christchurch District. This would more closely align with the current proposition to only amend the CDP and is our recommended approach. This "status quo" approach would however obviously limit any future consideration of this activity being more enabled in the other two districts to the existing planning framework without further and concurrent change to the CRPS. On balance we have elected to restrict the effect of this 'exception' clause to the Christchurch area only.

Although it is not anticipated there would be a proliferation of such activities at the scale envisaged, it is possible that a proposal for film production activity could be sought on a site that is not within one of the zones assessed as being appropriate for this activity. However, the way this clause is worded to relate to appropriate zones, and the high level that it sits within the CRPS, does not in our view provide any pre-emptive reason or justification to assume sites within other zones may also be

appropriate. Given the process to adoption and the recommended policy approach, our assessment is the risk of this being perceived as being more enabling in locations other than those identified is relatively low.

2.2.2 Policy 6.3.5

In addition to the changes to policy 6.3.1 it is proposed that there be some minor changes made to policy 6.3.5, including:

- inclusion of an additional clause 2.d. to make clear that commercial film and video production facilities are expected to be connected to reticulated water and wastewater systems.

This explicit requirement is intended to place a clear direction at the policy level that there is a need to avoid applications for water takes in this overallocated zone, and to ensure the protection of the natural environment from discharges of wastewater to land. These are significant issues in the rural environment surrounding urban Christchurch and merit strong guidance.

While this additional clause proposes a more specific wording than the other phrasing in this general policy, it is considered appropriate to do so in a very directive way. Alternative options of integrating this requirement into other policies have been considered but none cover the issues of infrastructure in the same way as this policy, and in our assessment, this is the most suitable place to insert this clause in the context of the CRPS.

- amending clause 4 to clarify that this type of activity is appropriate within the noise contours.

This is considered appropriate as the activity is likely to itself incorporate some noise generating activity for some aspects of the activity, and otherwise is designed to ensure sound proofing within the buildings.

This inclusion is proposed simply for the avoidance of any doubt and given that the activity is not listed as a noise sensitive activity we do not consider there to be any inherent risk with inserting this clarification.

2.2.3 Other policies

Beyond these policies, it is noted that the activity can rely also on support from CRPS objective 6.2.6 which provides for “*a range of other business activities are provided for in appropriate locations*”. As an ‘other business activity’ the film production activity can be provided for through specific provisions within the CDP to facilitate the appropriate locations for this activity, through provision within appropriate zones.

Further the film production activity can rely on being generally in accordance with all other relevant objectives and policies, especially those that seek to support and facilitate recovery, rebuilding and growth and wider economic and employment opportunities. Further objective and policy support for the activity in other zones

(commercial and industrial) at the CRPS level is not necessary as the activity would align with and comfortably fit under the general direction provided through policies such as 6.3.6 and 6.3.8 which anticipate business activities in business zones, greenfield priority areas and brownfield areas.

See **Appendix 1** for specific amendments proposed to the CRPS, and **Appendix 3** for further analysis of CRPS provisions.

3.0 Christchurch District Plan

3.1 Definitions

The CDP already contains a definition of '*Commercial film or video production*'⁴ which generally covers the nature of activity anticipated within this proposal. It is proposed to simply continue to apply this existing definition as outlined above.

It is however considered appropriate to amend the definition to be clear that the activity does not incorporate any residential component. Analysis of examples of film studios established elsewhere in New Zealand shows they do not incorporate a residential element and to do so introduces a risk of land use incompatibility that would very likely reduce the spatial extent of the opportunity that could be provided for this activity. Sensitive elements such as residential activity could be incompatible with the zones in which this overall activity is proposed to be located and significantly elevate the possibility of there being unavoidable reverse sensitivity effects. This clarification of the activity not including residential elements is also an important issue to ensuring that the activity is not considered to be a sensitive activity (as defined).

Acknowledging this is a very generic definition, we have considered the possible risks or advantages of alternative approaches, including there being separate definitions for larger production facilities and smaller facilities, and whether there is a need to differentiate between permanent and temporary activities (e.g. 'location filming'). We do not consider either of these alternative approaches to be necessary or consistent with the current approach adopted in the District Plan. For example, public artworks (a defined term) are enabled on a temporary basis in some locations through Chapter 6 but are then enabled as a permitted activity on a permanent basis within some specific zones e.g. the Commercial Core Zone in Chapter 15.

At present the defined term for commercial film or video production is only used within the temporary activities section of the Plan and is not used in any other zones or district wide rules. The application of the temporary activity rules would be unchanged and would continue to provide an enabling framework around such activities occurring on a short-term basis. This provides for 'location filming' or similar temporary filming activity occurring in generally what are public spaces. It is also noted that the temporary activity rules are not in this case particularly permissive including being very restrictive as to the timeframes in which this activity can operate (3 days in most cases).

The intent of this proposal is to add to the current rule framework and enable the same activity, or a larger more permanent form of it, to occur in specified appropriate areas. Any necessary differentiation is achieved, for example, by standards relating to activity size and location. Consistent with the general principle of only modifying the Plan where necessary, it is intended to be additive to the existing rules but not duplicating or overriding of them.

⁴ means activities associated with the creation of a film or video product where undertaken by a professional production company. It excludes filming by news organisations, students or private individuals.

Fundamentally the District Plan is not structured in a way that would prevent the same activity operating on a temporary basis in some situations and a permanent basis in others. Differentiation is not therefore necessary within the definition provisions. We also consider that having two similar definitions could lead to confusion around whether there is a deliberate intent to treat the same or similar activities differently, which is not inherently the case.

Similar to the discussion above, in relation to the CRPS definition of noise sensitive activity, and for the same reasons as set out in section 2.1 of this report, it is proposed to amend the CDP definition of 'sensitive activity' to be explicit that this does not include film production activity.

3.2 Objectives and policies

Having analysed the existing objectives and policies within the CDP (as set out in **Appendix 4**) it is considered that only minor amendments are necessary to integrate provision for this activity. These proposed changes are limited to:

- Amend strategic objective 3.3.7 to align with the 'expressly provided for' expectation within the CRPS. This is important in giving effect to the CRPS.
- Provide specific mention of film production activity within policy 15.2.7.1 and to compatible activities within policy 16.2.1.4 to give policy support to such proposals in commercial and industrial zones.
- The policies for the rural zones already anticipate a range of activities but explicit reference to this activity in policy 17.2.2.1 will provide more certain support for the activity.

We consider it necessary to introduce specific recognition for this activity within appropriate objectives and policies reinforcing the intent for this activity to be enabled within the CDP (subject to standards). Providing such explicit policy support addresses one of the consequences of what is effectively a "default" discretionary or non-complying activity status for this activity within the Plan at present, where more permanent film production activity and related development was not necessarily intentionally excluded when the Plan was prepared.

3.2.1 Strategic objectives

Specifically, it is considered necessary to amend strategic objective 3.3.7 to align this with the CRPS which anticipates express provision for urban activity outside existing urban areas. In our assessment, the current wording of the strategic objective does not align with the CRPS and thus does not adequately give effect to it.

3.2.2 Commercial and industrial policies

Additionally, while it could be considered that this activity implicitly falls under the general discussion in the commercial and industrial zone objectives and policies, it is

considered appropriate to make specific mention of film production within policy 15.2.7.1 and to compatible activities within policy 16.2.1.4 to give policy support to such proposals in commercial and industrial zones.

3.2.3 Rural policies

The policies in the CDP for the rural zones already generally anticipate a range of activities and could be considered to support this type of proposal, however explicit reference within the policy will assist to ensure that this is not ambiguous. Policy 17.2.2.1 sets out the anticipated types of activities within rural areas and it is efficient to integrate provision for this activity within that policy. It is proposed that this activity be specifically listed in the policy so as to be expected in some rural areas.

It is proposed that the expectation of areas generally suitable for this activity is expressed in this policy through reference to these being located “*on the rural flat land close to the main Christchurch urban area*”. This wording within the policy will further assist to support overall consolidation outcomes and connections to reticulated services, and also is consistent with the terminology used in other policies. It also provides clear direction in terms of the rural environments where the activity is not considered to be suitable. To that extent, the rules that give effect to this policy will not enable such activity within all rural zones e.g. it is not proposed to be listed as a permitted activity in the Rural Port Hills or Rural Banks Peninsula zones.

Consideration was also given to listing the appropriate zones within the policy. Technically, there is no strict requirement that a policy must be interpreted to apply to all zones but there can be a policy approach which is applied to appropriate locations through the rule framework. Listing zones within a policy is therefore not strictly necessary. This is evident in the mixed approach taken in the current CDP policies for the rural zones with some activities e.g. plantation forestry and quarrying having their own specific policy with direction on where and how such activities will be managed, and other activities being more generally mentioned e.g. “*recreation activities in the rural flat land area surrounding the main Christchurch urban area*”. We have taken the latter approach as the more appropriate and certain in this situation.

3.2.4 Other policies

Similar, to the CRPS, this activity can generally rely on support from key objectives and policies already in place in the CDP, including:

- Generally, as a business activity – strategic objectives 3.3.1⁵ and 3.3.5⁶.

⁵ Strategic objectives: 3.3.1 Objective - Enabling recovery and facilitating the future enhancement of the district

- a. The expedited recovery and future enhancement of Christchurch as a dynamic, prosperous and internationally competitive city, in a manner that:
- i. Meets the community's immediate and longer term needs for housing, economic development, community facilities, infrastructure, transport, and social and cultural wellbeing; and
 - ii. Fosters investment certainty; and ...

⁶ Strategic objectives: 3.3.5 Objective - Business and economic prosperity

The critical importance of business and economic prosperity to Christchurch's recovery and to community wellbeing and resilience is recognised and a range of opportunities provided for business activities to establish and prosper.

- For the commercial zones – strategic objectives 3.3.7⁷ and 3.3.10⁸, and commercial objective 15.2.1⁹
- For the industrial zones – strategic objectives 3.3.7⁷ and 3.3.10⁸, industrial objectives 16.2.1¹⁰ and 16.2.2¹¹
- For the rural areas – strategic objective 3.3.16 a¹², and rural policy 17.2.2.1¹³

The activity can also rely on its ability to be designed and operated to be in accordance with all other objectives and policies for matters such as transport / traffic, servicing / infrastructure, urban design principles, amenity values, etc.

Appendix 4 contains further analysis of the objectives and policies within the CDP.

3.3 Rules and Activity Status

Currently this activity is not provided for explicitly in the CDP as a permanent facility or activity. It would be treated as a discretionary or non-complying activity in most zones as set out in **Appendix 5** to this report. There would be very little (if any) support for such an activity from objectives and policies with there being no specific reference to activity of this type. In our assessment, and relatively speaking, this situation of “default” activity status, combined with a lack of policy support, would make it more uncertain, potentially time consuming and costly to gain a resource consent for this type of facility. An uncertain and potentially discouraging position within the planning framework has a greater risk of being perceived negatively by potential applicants, regulators and the wider community. In our evaluation the sometimes subtle distinction

⁷ Strategic objectives: 3.3.7 Objective -- Urban growth, form and design

- a. A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that: ...
- xvi. Identifies opportunities for, and supports, the redevelopment of brownfield sites for residential, business or mixed use activities; and ...

⁸ Strategic objectives: 3.3.10 Objective - Commercial and industrial activities

- a. The recovery and stimulation of commercial and industrial activities in a way that expedites recovery and long-term economic and employment growth through:
- i. Enabling rebuilding of existing business areas, revitalising of centres, and provision in greenfield areas; and
- ii. Ensuring sufficient and suitable land development capacity.

⁹ Commercial zones: 15.2.1 Objective - Recovery of commercial activity

- a. The critical importance of commercial activity to the recovery and long term growth of the City is recognised and facilitated in a framework that supports commercial centres.

¹⁰ Industrial zones: 16.2.1 Objective - Recovery and growth

The recovery and economic growth of the district's industry is supported and strengthened in existing and new greenfield industrial zones.

¹¹ Industrial zones: 16.2.2 Objective - Brownfield redevelopment

- a. The recovery and economic growth of the Christchurch District is provided for by enabling redevelopment, including mixed-use development, of appropriate brownfield sites while not compromising the function of the wider industrial area for primarily industrial activities.

¹² Strategic objectives: 3.3.16 Objective - A productive and diverse rural environment

- a. A range of opportunities is enabled in the rural environment, primarily for rural productive activities, and also for other activities which use the rural resource efficiently and contribute positively to the economy. ...

¹³ Rural zones: 17.2.2.1 Policy - Range of activities on rural land

- a. Provide for the economic development potential of rural land by enabling a range of activities that: ...
- ii. have a functional, technical or operational necessity for a rural location; or ...

between how the current planning framework provides for this activity now and the more accommodating alternative approach recommended is an important one to appreciate in understanding how more enabling and encouraging the proposition is.

Partly for this reason, we favour an approach that is much more explicit about what the Plan envisages (or not) for an activity of this type, and an approach that is as enabling as it can be without unduly compromising the wider aims and intentions of the planning framework. Endeavouring to be that enabling and accommodating of the activity does introduce some risk, but in our evaluation, that risk in this case is adequately able to be managed by ensuring the opportunity is appropriate both spatially and in respect of site-specific controls over development. A key to that is providing for the activity in locations and in a manner that closely aligns with the outcomes already envisaged and anticipated by the Plan. That risk is further mitigated, and the degree of change that is necessary is lessened, because the current Plan does not appear to have been developed with the specific intention of excluding this type of activity if it were to be developed on a large and more permanent basis. Rather the activity has simply not been specifically contemplated.

3.3.1 Temporary activities

The Temporary Activities section of the General Rules¹⁴ is the only section of the Plan in which this term is used and applies as follows:

6.2.4.1.1 Permitted activities

Filming	
P6	<p><i>Commercial Film or video production and ancillary buildings or structures; in any zone except an industrial zone.</i></p> <ol style="list-style-type: none"> 1. <i>Any such production shall not operate from the same exterior location for more than 30 days in a year.</i> 2. <i>From 22:00 to 07:00, any such activity shall meet the noise standards for the relevant zone in Rule 6.1.5, but is otherwise exempt from noise standards in Sub-chapter 6.1.</i> 3. <i>From 22:00 to 07:00, any such activity shall meet the rules for outdoor lighting in Rule 6.3.6, but is otherwise exempt from Rule 6.3.6.</i>

6.2.4.1.4 Discretionary activities

D1	<p><i>b. commercial film or video production in an exterior location, other than such production using pre-existing formed tracks or paved surfaces or in a Permitted Temporary Activities Areas identified in Appendix 6.11.10, which:</i></p> <ol style="list-style-type: none"> <i>i. lasts longer than three days; or</i> <i>ii. involves more than 200 people; or</i> <i>iii. involves motorised vehicle use, other than in the area of open unvegetated beach on the seaward side between Heyders Road and the mouth of the Waimakariri River.</i>
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(Appendix 6.11.10 provides plans of specified beach and foreshore locations)

¹⁴ Chapter 6 General Rules and Procedures, Section 6.2 Temporary Activities, Buildings and Events.

On this basis this activity may already occur “as of right” as a temporary activity in any zone, except an industrial zone, provided any such production does not operate in the same exterior location (where the location is specified in the appendix) for more than 30 days per year, and in all other locations is limited to only 3 days as a permitted activity.

This proposal does not seek to change these provisions. They would continue to apply to temporary filming activity and would remain particularly applicable to the activity of film shoots or location filming, often occurring in public areas.

3.3.2 Permanent activities

By contrast to temporary activities, permanent commercial film or video production facilities are not listed in any zone chapter (see activity status analysis in **Appendix 4**) and thus in all zones under the District Plan this activity falls to be considered under the “catch-all” rules, being the rules which apply to activities which are not specifically identified (e.g. “*Any activity not provided for as permitted, restricted discretionary or non-complying.*”). Generally, these default rules result in the activity being classified as either a discretionary or non-complying activity, with very little (if any) support from objectives and policies.

Having reviewed the CDP provisions, we do not understand this default position to reflect a deliberate decision to exclude this activity from the CDP. This is not a completely foreign activity that was not contemplated but was simply envisaged to occur in a temporary filming capacity rather than as a permanent facility. In general, therefore, it is not our impression that the permanent aspects of this industry were deliberately excluded from any zone and in fact are very similar to the types of activities explicitly anticipated in several of the existing zones. Given the potential opportunity that is now apparent, and the benefits of that activity to the area, it is now appropriate to take advantage of such an opportunity and introduce rules that explicitly enable this industry in manner that is consistent with the expectations of the planning framework.

In our assessment, a discretionary or non-complying activity status is unnecessary in appropriate locations as the activity and its potential effects are well understood and able to be appropriately managed through the application of activity specific and built form standards. As stated, the current activity status of discretionary or non-complying has the potential to be discouraging of such activity, with its inherent benefits, establishing within Christchurch.

From our analysis of other established sites, it appears that film production activity generally incorporates a range of buildings, some large in scale, on a large site with ancillary activities, carparking, traffic movement, noise, landscaping and other associated activity. Analysis has been undertaken of film production activity (generically) against the existing rules and standards within the CDP (see **Appendix 5**) and this shows that the nature of the activity would fit more compatibly in some zones than others.

Appropriate zones that currently anticipate some form of business activity, including activities that have considerable traffic movements, large buildings and a range of activity types, are:

- Commercial Mixed Use
- Commercial Central City Mixed Use
- Industrial General
- Industrial Heavy
- Industrial Park
- Rural Urban Fringe
- Rural Templeton

All of these zones currently anticipate some form of business activity including activities that have similar characteristics. The film production activity compares favourably with these zones in terms of the intended outcomes anticipated by the existing zoning and standards that apply to each zone. The nature and likely effects of film production activity are proportionate to those that would occur from other anticipated activities within these zones and thus are considered to be reasonable and compatible in these areas. Informed by those comparable developments that already exist elsewhere in New Zealand, and in a planning framework that is effects orientated, we have evaluated the environmental impacts that are likely to arise from this type of activity to be consistent with the effects or other activities already occurring or provided for in these locations. That close correlation has been a key determinant in the selection of those zones where it is recommended the enhanced opportunity be provided and in the exclusion of other less suitable areas.

Accordingly, to incorporate this activity into the existing rule framework it is proposed to list it as a permitted activity in the appropriate tables relating to the above zones, with it subject to the relevant activity specific or built form standards (see commentary below). A specific development proposal not meeting the built form standards would then be a restricted discretionary activity to enable consideration of effects of the proposal in terms of the rule not met and the potential adverse effects of this.

All other zones have been considered and found to have higher sensitivity to large scale activities or are designed to provide for specific activities only and thus contemplate environments that are much less compatible with film production activities. For this reason, it is not proposed to enable this activity in any other existing zones.

3.3.3 Activity based approach

It is important to note that this proposition is not based around any particular proposal or application site and is intended to provide for an opportunity for this activity across various suitable environments rather than provide for a precise development. This proposition is not looking at identifying any specific sites that may be suitable for such development or providing an activity specific rezoning to any particular area.

Appendix 6 contains a summary of information relating to other commercial film production facilities around New Zealand and highlights the nature of these activities, and their likely effects. It is clear that these activities typically have attributes that are urban in nature (large buildings, carparking, high vehicle movements), but also other attributes that are not uncommon in a rural context (large sites, significant areas of landscaping, outdoor storage, workshops and intermittent noise). In this way the activity lends itself to compatibility with several zones as the density of development is balanced with large areas of open space and the ability to integrate high levels of amenity into a site-specific design.

While no specific proposal informs this report, the general understanding of the characteristics of these activities enables consideration of the areas in which such activity can be integrated without undue adverse effects. In providing this opportunity it is appropriate to find situations where the activity can fit comfortably in terms of anticipated effects and the character of areas generally. It is acknowledged that the activity will have effects, as do all activities, but that these can be controlled efficiently through the application of rules so as to be consistent with the expected environmental outcomes in these various areas. As in any plan drafting exercise, confidence in that compatibility is a key factor in mitigating the risk of unintended or unforeseen outcomes arising.

3.3.4 Other approaches

An area of concern to parties in the development of this proposal is the potential for enablement of the filming industry to unacceptably risk achieving the consolidation strategy intended for the urban areas of the district. The rules proposed, and the inclusion of the Rural Urban Fringe Zone in particular, could be seen to risk reverse sensitivity effects, precedent effects and a blurring of the urban / rural lines. In our assessment, this is the component of the recommended proposal that has inherently the greatest area of risk for the integrity of the planning framework and as such, one which we have carefully assessed.

In considering the application of rules and activity status to the proposed enablement of filming activity, we have also explored the application of a restricted discretionary activity status, either in all cases or specifically in the rural zones. At face value this could be seen to address issues such as reverse sensitivity, consolidation, priority of zones, precedent effects, and the like. While still providing an improved opportunity in the selected areas, variable activity status in the different identified zones is another method of “biasing” the opportunity in favour of certain areas, e.g. urban zones over rural zones.

On balance it is our considered view that it is unnecessary to impose a more restrictive activity status when the intent of the proposal is to be as enabling as possible while dealing appropriately with anticipated effects. This invariably requires a balancing of the opportunity that is provided with ensuring the fundamental aims of the Plan and the CRPS are still able to be realised.

It is considered that the permitted activity status, combined with application of appropriate rules, is an efficient and effective approach to this issue and managing the

associated risk. We consider that the inherent potential threat to consolidation can be mitigated through the application of appropriate rules that are explicitly related to this activity and not applicable to any other activity.

The application of a minimum site area requirement as an activity specific standard in the rural zones, as set out below, will further assist to address some of the above concerns. A minimum site area will protect against any potential for there to be a proliferation of smaller facilities in the rural areas and thus reduce precedent and reverse sensitivity concerns. In conjunction with the rule requiring connection to reticulation and the necessity for an Integrated Transport Assessment (ITA) through the high trip generator rule, we envisage that activities will naturally locate on main roads closer to the urban edge. This, together with the likelihood that there could reasonably be expected to be only be a couple of large facilities that would establish locally, will therefore not significantly undermine overall consolidation aims. While the entire Rural Urban Fringe and Rural Templeton zones are included in the zones where the activity will be enabled, the reality of the recommended provisions is a much more spatially limited opportunity within those rural environments.

In effect the combination of the minimum site area rule, the high trip generator rule and the rule requiring reticulation will mean that much of the Rural Urban Fringe zone will not be available for this activity. The areas of that zone located closest to the urban zones have the greatest potential to have reticulation available or to be realistically extended to service a site. The ITA would also effectively limit the location of sites away from small rural roads or those that have difficult access to the wider area. In contrast, applying a restricted discretionary activity status to the activity as a whole, risks sending a less encouraging signal to the enabling approach sought.

Although the general restricted discretionary activity approach is applied for some activities already in the CDP, we consider it would be challenging to determine what appropriate matters of discretion would apply if the proposal could otherwise meet all the expected outcomes (site coverage, building heights, landscaping, reticulation, site area, traffic management etc). Beyond these contextual matters for a chosen site, any assessment would seem to be related to consideration of “whether there is another better location” or analysis of all other options around the district. If it is to be genuine, that type of assessment would be very open ended requiring a widespread analysis of many factors influencing land availability and project feasibility, and in our assessment the associated costs and uncertainty of that process could very much run counter to encouraging this type of activity to seek to establish. In contrast, a rule based approach provides a great deal more certainty, and it is probable a resource consent will still be necessary under the proposed approach due to the district wide high trip generator rule at least (and other district wide rules may also be triggered). We note that the consent needed under the high trip generator rule is very narrow in application, easily and commonly dealt with through technical analysis, and predetermined as non-notified which provides a high level of certainty in how a related application would be processed.

We acknowledge that there could remain a perceived risk in relation to consolidation aims and precedent effect, but we consider this to be a relatively low risk, largely mitigated through the rules imposed and through proper assessment against the

holistic policy provisions. We note that should an application arise in the future for a 'similar' activity that is seeking to use precedent arguments, a processing planner and decision maker can rightly rely on the ability to reference the bespoke section 71 approach to introducing this particular activity, the associated appraisal of this activity to satisfy those legislative requirements, and the potential outcomes and opportunities sought. In our view this unique and very specific process cannot rightly be considered a general loosening of the approach to managing environmental effects, protecting rural areas and promoting urban consolidation.

We also take some comfort from the CRPS already contemplating specific exceptions to be identified without that undermining the overall consolidation philosophy inherent in the management of rural and urban land use. While it is proposed to take advantage of that "exception" opportunity, and been satisfied it is appropriate to do so, no other amendment to the essential policy framework managing that urban/rural interface (including Map A) is being proposed, and no removal of protective controls within the respective rural (or other) zones is contemplated.

3.4 Standards

3.4.1 Activity specific standards

The rule tables that set out permitted activity status within each zone also contain activity specific standards where applicable. Within the commercial and industrial zones, there are no activity specific standards considered relevant or necessary given the alignment of this type of activity with other permitted activities. It is common in these zones that there are no activity specific standards that apply to activities. In our evaluation there is very close alignment in that regard.

Within the two rural zones, it is proposed to include two activity specific standards.

Firstly, it is proposed to apply an activity specific standard requiring any proposal for a film or video production facility to ensure a connection to reticulated water and wastewater. This rule will give effect to the added CRPS and CDP policies and will assist to avoid adverse effects as discussed above. This is seen as an important requirement for a potential development of scale in the rural zones on the edge of the urban area. It is proposed that if this activity specific requirement is not met, the activity status will move to a non-complying activity which will provide clear direction that a lack of reticulation is a significant issue and not to be taken lightly. This will also align with the policy direction to ensure that reticulation is achieved and the water resource protected.

Secondly, it is proposed to include a minimum site area requirement for this activity within these rural areas. This will limit the enablement under the rule to larger sites to ensure that they would likely be utilised by larger campus style facilities, which is consistent with the form and scale of those permanent film studio and production facilities that already exist elsewhere in New Zealand, and to better align with anticipated rural outcomes. It is understood that such large-scale film production activities will not be common, and it is expected to be a finite proposition in a relatively

constrained market. In this way it not expected that this would set an unreasonable precedent or undermine the general intent for the rural zone. A breach of this activity specific standard would be considered as a restricted discretionary activity to enable consideration of the appropriate site area to the location and the ability to meet other standards, while still maintaining appropriate rural character and amenity values.

3.4.2 Built form standards

It is considered appropriate to generally rely on the existing standards that relate to each of these zones to control outcomes and effects (building height, setbacks, etc.) These standards provide for anticipated outcomes that contribute to the character of the zones and typically address critical elements of amenity or environmental protection.

In utilising the existing standards, it is more likely that a future film production activity will also align with the intent and character of these zones and be compatible with other existing activities and those anticipated to establish in these various areas. We have not identified any need to change the applicable standards in any of the identified commercial or industrial zones (see commentary in **Appendix 5**), with the existing provisions appearing well suited to the likely type of development associated with this activity.

3.4.3 Rural zone built form standards

In relation to the two rural zones that this activity would be enabled within (Urban Fringe and Templeton), it is proposed that the base built form standards continue to apply generally to the activity. This would include applying the existing rules for aspects such as building height and building setbacks from the boundaries. It is then proposed to incorporate additional / amended standards in relation to site coverage and landscaping to ensure appropriate management of effects and retention of compatible outcomes (see **Appendix 2** for specific amendments proposed).

The Rural Templeton zone is a bespoke zone recently introduced into the District Plan to provide for re-use of the site of the former Templeton Hospital and to recognise that this land does not demonstrate a typical rural character. The zone was designed to provide for a range of activities beyond usual rural activities to be controlled by a combination of standards and an Outline Development Plan (ODP). It is proposed that the ODP would not apply to film production activity if it were to establish in this zone as that ODP was not designed to fit an activity of that sort and its expected layout. However, the outcomes controlled by the ODP in terms of visual amenity, density and general layout would continue to be applied through the other standards and the additional controls proposed (see below). In that sense, the general amenity and other environmental outcomes that are currently anticipated would be maintained.

The inclusion of a landscaping rule within the Rural Urban Fringe zone has been aligned with other similar landscaping provisions for ensuring quality visual outcomes. In addition, it is proposed to require a 3m landscaping strip on both the road and residential zone boundaries to further maintain visual amenity. For completeness, we

also note that there is no need for this in the Rural Templeton zone as there are already landscaping rules that apply and would continue to apply unchanged to this activity.

The amendments to the site coverage rules seek to ensure that a site is not dominated by buildings or impervious surfaces but maintains a largely open appearance. In the Rural Urban Fringe zone, the approach to site coverage differs according to the size of the site and is also not consistently worded within the rule¹⁵. To ensure clarity it is proposed to specifically list this activity within the rule and apply a 5% site coverage restriction to buildings and a 40% coverage restriction to the combination of buildings, impervious surfaces (e.g. carparking) and outdoor storage. This addition to the rule will ensure that the site remains largely open in character. The additional clause will continue to be based on whether sites are above or below 4ha in area to maintain internal consistency within the rule. A situation could occur where a proposed site meets that rule but is under the activity specific standard minimum area of 6ha and in that case a consent would be needed under the specific rule to consider compatibility with the character of the area rather than the coverage of the site by buildings and surfaces.

In the Rural Templeton zone, a similar approach has been taken with a 40% coverage control proposed to be applied to buildings, impervious surfaces and outdoor storage areas. In addition, a stepped rule approach is proposed in this zone to align with the existing rules, introducing a restricted discretionary activity status to site coverage of 40%-50%, and non-complying activity status for site coverage above that.

Within the Rural Urban Fringe and Rural Templeton zones, there is a zone-specific traffic movement standard which limits the maximum number of vehicle trips per site for all non-rural activities to 100 per day before a resource consent is required to consider traffic movements. The district wide traffic rules also contain restrictions on vehicle trip numbers for sites, with the high trip generator rule (7.4.3.10) applying to all sites according to the type of activity. In the case of film studio activity, it would be an “other activity” and would have limits that are likely to be exceeded, meaning that a transport related resource consent would be needed and an ITA required. Given the standard trip generation rule would apply to this activity within the Rural Templeton zone and would maintain appropriate oversight of traffic effects, it is not considered necessary that an additional lower standard be applied in this zone.

3.4.4 District wide standards

There are a wide range of district wide rules covering many aspects of the base expectations for the district, and including matters such as transport and parking, noise levels from activities, protection of areas with particular values (cultural sites and areas, heritage items), protection of ecological areas and waterbodies, and basic standards for activities such as earthworks.

It is proposed that the district wide rules would continue to apply to any future film production activity. These general standards will apply to any future proposal for this

¹⁵ Rule 17.5.2.6 i. relates to buildings and outdoor storage areas, while clause ii also includes all impervious surfaces.

activity, according to the zone in which it is located, the nature of the proposal and the specific site, and other site characteristics such as the road type in relation to traffic matters.

One particular district wide standard we have looked at is the high trip generator rule which applies to activities generating larger numbers of traffic movements, especially at peak times. It is likely that any film production proposal would need resource consent under the high trip generator rule at least (which would be a restricted discretionary activity) and this is appropriate to ensure an adequate ITA is undertaken. Depending on design and location there may be other district wide rules that also apply to a proposal.

We have also further considered the issue of whether any aspects of the film production activity may be susceptible to effects from external noise. Given the location of some of the zones relevant to this proposal, there are some parts of the zones located within the airport noise contours which may be subject to higher noise levels than wider areas. Although this film production activity does not qualify as a sensitive activity by definition, as explained above, some parts of the activity within such a development (such as the sound stages) may have some susceptibility to noise simply in order to operate successfully. This would be an operational issue rather than a health and wellbeing issue but could still have potential reverse sensitivity outcomes if not appropriately managed.

The CDP includes an existing rule (rule 6.1.7.2.2) relating to noise from airport activities and requiring specified new activities to include sound insulation to ensure a level of compatibility and to protect people within buildings to be able to sleep or work safely. This existing rule includes sensitive activities, such as residential, as well as some further activities that are not included within the definition of sensitive activities e.g. retail activities, commercial services and offices.

Whilst the film industry might ordinarily be expected to insulate their buildings to a high standard where it is necessary in order to operate, the inclusion of this activity within the rule will provide an appropriate reassurance that such activity can achieve a level of internal insulation that will maintain operation as well as avoiding reverse sensitivity effects. It would appear that rule 6.1.7.2.2 has been based on Table 3.3 of Australian Standard AS 2021:2000¹⁶. To align with that approach, it is proposed that the susceptible elements of the film production activities also are included within this rule and are included at the same level as that applied in AS 2021:2000. We have taken acoustic advice that the appropriate conversion of the AS 2021:2000 Table 3.3 40 dB(A) level for recording studios equates to a 47 dB LAE level to be compatible with the current rule framework.

Beyond these rules outlined above, the continued application of all other district wide rules is appropriate to ensure compatibility with the surrounding environment and alignment with the amenity values anticipated, as well as alignment with other expectations for the district as a whole. It is not considered necessary or appropriate to amend these base rules.

¹⁶ Acoustics - Aircraft noise intrusion - Building siting and construction, AS 2021:2000

See **Appendix 2** for specific amendments proposed to the CDP, and **Appendices 4 and 5** for further analysis of CDP provisions.

4.0 Other Relevant Documents

4.1 National Policy Statements and National Environmental Standards

Under the Resource Management Act 1991 a number of National Policy Statements (NPS) and National Environmental Standards (NES) have been prepared to provide a national approach to key issues¹⁷. Some of these documents are relevant to the areas considered within this assessment and these national documents would continue to apply to any proposal for a Commercial Film Production activity depending on the site location identified and site-specific issues. For example, a development site in an industrial zone is likely to need assessment under the NES: Contaminated Soils to ensure no soil contaminants will affect human health. This proposition would not override any of the national directions and, with those provisions continuing to apply, would ensure alignment with the outcomes expected in those documents.

4.2 Land Use Recovery Plan (LURP)

The Land Use Recovery Plan has been prepared under the Christchurch Earthquake Recovery Act. It is a statutory document and any decisions under the Resource Management Act 1991 (RMA), must not be inconsistent with the Recovery Plan. The Land Use Recovery Plan focuses on the metropolitan urban area of Christchurch and towns stretching from Lincoln, Prebbleton and Rolleston in the south to Kaiapoi, Rangiora and Woodend/Pegasus in the north.

The LURP provides direction for residential and business land use development to support recovery and rebuilding across metropolitan greater Christchurch. The Recovery Plan directed the Christchurch City Council, Waimakariri and Selwyn District Councils and Canterbury Regional Council (Environment Canterbury) to make changes to RMA documents and other instruments to give effect to the Recovery Plan.

One of the key recovery needs addressed by the LURP is the need for provision for business activities to both recover and grow, and the enablement of commercial film production activities is aligned with this intent. Enablement of this activity within the urban areas of Christchurch City would be consistent with the LURP and the outcomes sought for recovery and growth.

4.3 Christchurch Central Recovery Plan (CCRP)

The Christchurch Central Recovery Plan is a critical statutory document developed under the Canterbury Earthquake Recovery Act 2011, for the central business district

¹⁷ National Policy Statements: Urban Development Capacity, Freshwater Management, Renewable Electricity Generation, Electricity Transmission and Coastal areas. National Environmental Standards: Air Quality, Sources of Drinking Water, Telecommunication Facilities, Electricity Transmission Activities, Assessing and Managing Contaminants in Soil to Protect Human Health and Plantation Forestry.

(CBD) – the area bounded by Bealey, Fitzgerald, Moorhouse, Deans and Harper Avenues.

The Recovery Plan directed the Christchurch City Council to make a series of changes to its District Plan to ensure the objectives of the Recovery Plan are met and those with existing functions or powers under the Resource Management Act 1991 must not make decisions that are inconsistent with the Recovery Plan.

The intent for the Central City Mixed Use Zone within the CCRP was to enable a range of activities, including light industrial, education, health facilities, residential activity and travellers' accommodation, and to restrict the extent of retail, commercial services and office development.

This proposal to enable commercial film production activity is compatible with the anticipated outcomes for the Central City Mixed Use Zone and such activity within this zone would contribute to the recovery, regeneration and growth of the Central City.

5.0 Summary of Changes

The proposed changes to the CRPS and CDP are intended to be as simple as possible to reflect that this is not an activity that is notably different from many already provided for by the planning framework. However, we anticipate these small changes will have significant benefits to enabling an opportunity for such activity to be realised. The activity was not deliberately excluded from the CDP and the existing rules instead reflect a 'default' status.

The intention in this proposal is to formulate a more deliberate approach of permitted activity status where applicable standards are met. This approach provides more certainty of the consenting process and will allow a very clear understanding of the information requirements for potential applicants. It takes the situation for a proposal from one of comparatively high uncertainty with no specific policy direction, to one of certainty of information and design elements, and clear understanding of process.

In our assessment, that can be achieved without introducing undue risk to the integrity of the planning framework, and in a manner that provides greater certainty of process and potential outcome for the film studio industry and those who may wish to take advantage of that opportunity locally.

Essentially the result of the proposed changes to the CDP rules can be summarised as:

- For the **Commercial Mixed Use** and **Commercial Central City Mixed Use** zones, commercial film or video production activities would go from being assessed as a discretionary activity, to having a permitted activity status subject to compliance with built form standards.

District wide standards would continue to apply, and it is likely that any proposal would need a resource consent under the high trip generator rule (restricted discretionary and predetermined as non-notified).

- For **Industrial** zones, commercial film or video production activities would go from being assessed as a discretionary or non-complying activity, to having a permitted activity status subject to compliance with built form standards.

District wide standards would continue to apply, and it is likely that any proposal would need a resource consent under the high trip generator rule (restricted discretionary and predetermined as non-notified).

- For the **Rural Urban Fringe** and **Rural Templeton** zones, commercial film or video production activities would go from being assessed as a non-complying activity, to having a permitted activity status subject to compliance with activity specific and built form standards.

District wide standards would continue to apply, and it is likely that any proposal would need a resource consent under the high trip generator rule (restricted discretionary and predetermined as non-notified).

In addition, and depending on site layout and design, the more restrictive rules in these rural zones may mean that a development may seek resource consent for a breach of building height or site coverage rules. A breach of either of these rules in these zones would require a restricted discretionary activity consent. The height rules are not predetermined as non-notified (thus a decision on potential notification or limited notification would be made under the usual provisions of the RMA), whereas the site coverage rules are predetermined as non-notified.

Additionally, if a development were to exceed 50% site coverage by buildings, impervious surfaces and outdoor storage in the Rural Templeton zone, it would require resource consent as a non-complying activity.

The following table provides a wider summary of the changes proposed and the effect of the amended provisions put forward in the proposition:

Table 1: Summary of Effect of Changes Proposed

Document	Change proposed	Effect of change
CRPS	Amend Policy 6.3.1 to include express provision for commercial film or video production activities in appropriate commercial, industrial and rural zones (and associated updates to reasons and explanation).	Provides clarity that such activities are anticipated to occur within Greater Christchurch even if located outside the existing urban areas or greenfield priority areas.
	Amend Policy 6.3.5 to direct that that new commercial film or video production facilities are connected to reticulated water and wastewater systems (and associated updates to reasons and explanation).	Provides direction on this anticipated outcome which will contribute to protection of environmental values and supports the requirement of this at the CDP level.
	Amend Policy 6.3.5 to clarify that commercial film or video production facilities are compatible activities within airport noise contours (and associated updates to reasons and explanation).	Provides clarity on compatibility.
	Add definition of Commercial film or video production.	Ensures alignment with CDP and defines the term used in policies.
	Amend definition of noise sensitive activity to explicitly exclude Commercial film or video production activities.	Provides clarity that commercial film or video production facilities are not noise sensitive.
CDP	Amend definition of Commercial film or video production to include buildings and exclude residential activity.	Provides clarity on what is included in this definition.
	Amend definition of sensitive activities to explicitly exclude Commercial film or video production activities.	Provides clarity that commercial film or video production facilities are not noise sensitive.

Document	Change proposed	Effect of change
	Amend strategic objective 3.3.7.	To align with and give effect to the CRPS.
	Amend rule 6.1.7.2.2 to include some aspects of commercial film or video production activity.	Provides clarity around indoor design sound levels.
	Amend Objective 15.2.7.1 to include commercial film or video production activity.	Provides clarity that this activity is anticipated in the Commercial Central City Mixed Use Zone
	Insert commercial film or video production into the Commercial Mixed Use Zone permitted activity table.	Provides for this as a permitted activity subject to standards.
	Insert commercial film or video production into the Commercial Central City Mixed Use Zone permitted activity table.	Provides for this as a permitted activity subject to standards.
	Amend policy 16.2.1.4 to provide for commercial film or video production as a compatible activity in industrial zones.	Provides clarity that this activity is anticipated in industrial zones.
	Insert commercial film or video production into the Industrial General Zone permitted activity table.	Provides for this as a permitted activity subject to standards.
	Insert commercial film or video production into the Industrial Heavy Zone permitted activity table.	Provides for this as a permitted activity subject to standards.
	Insert commercial film or video production into the Industrial Park Zone permitted activity table.	Provides for this as a permitted activity subject to standards.
	Amend Policy 17.2.2.1 to include commercial film or video production activity on flat land close to the main Christchurch urban area.	Provides clarity that this activity is anticipated in rural zones close to urban Christchurch.
	Insert commercial film or video production into the Rural Urban Fringe Zone permitted activity table. Include activity specific standards for minimum site area and connection to reticulation.	Provides for this as a permitted activity subject to standards. Includes requirements to address size of site and connections.
	Insert a clause in the restricted discretionary activity table to cover non-compliance with the site area standard.	Provides an activity status where the minimum site area is not provided.

Document	Change proposed	Effect of change
	Insert a clause in the non-complying activity table to cover non-compliance with the reticulation standard.	Provides an activity status where the reticulation is not provided.
	Amend rule 17.5.2.6 to provide site coverage standards for commercial film or video production.	Provides an appropriate level of site coverage for this activity.
	Amend rule 17.5.2.7 to not require an additional traffic rule to apply to commercial film or video production.	Enables this activity while traffic effects remain addressed by the High Trip Generator rule.
	Add an additional rule for landscaping for commercial film or video production (and associated matters of discretion).	Ensures a minimum level of site landscaping for this activity.
	Insert commercial film or video production into the Rural Templeton Zone permitted activity table (and consequential amendment to non-complying activity table). Include activity specific standards for minimum site area and connection to reticulation.	Provides for this as a permitted activity subject to standards. Includes requirements to address size of site and connections.
	Insert a clause in the restricted discretionary activity table to cover non-compliance with the site area standard.	Provides an activity status where the minimum site area is not provided.
	Amend the non-complying activity table to cover non-compliance with the reticulation standard and address activities exceeding 50% site coverage.	Provides an activity status where the reticulation is not provided and a stepped approach to site coverage.
	Amend rule 17.10.2.4 to provide an additional site coverage rule for commercial film or video production (and consequential amendment to non-complying activity table).	Provides an appropriate level of site coverage for this activity.
	Amend rule 17.10.2.7 to not require an additional traffic rule to apply to commercial film or video production.	Enables this activity while traffic effects remain addressed by the High Trip Generator rule.

The recommended changes to the CRPS and the CDP to give effect to this proposition, follow in **Appendices 1-2** to this assessment. Additional analysis of the key planning documents is also included in **Appendices 3-5**. **Appendix 6** contains a high level summary of other similar facilities in New Zealand.

Appendix 1: Amendments to CRPS

(Text proposed to be inserted is shown in red underlined while deletions are shown ~~red struck through~~.)

CHAPTER 6 - RECOVERY AND REBUILDING OF GREATER CHRISTCHURCH

6.3.1 Development within the Greater Christchurch area

In relation to recovery and rebuilding for Greater Christchurch:

...

6. provide for commercial film or video production activities in appropriate commercial, industrial and rural zones within the Christchurch District;

~~76.~~ provide for a metropolitan recreation facility at 466-482 Yaldhurst Road; and

~~87.~~ avoid development that adversely affects the function and viability of, or public investment in, the Central City and Key Activity Centres.

Principal reasons and explanation

To ensure that recovery resources are managed efficiently and sustainably, the provisions identify where certain types of development can take place, and where they cannot take place. The provisions also recognise that specific activities are provided for outside of urban areas elsewhere in the CRPS, such as papakāinga housing and marae under Policy 5.3.4; educational facilities where no other practicable options for locating the facility exist; commercial film or video production to support the regional economy and provide employment opportunities; and a metropolitan recreation facility at 466-482 Yaldhurst Road that serves the urban population. It is anticipated that established urban activities located outside of the identified urban area will be able to continue to operate their activities, with any expansion considered on a case-by-case basis.

6.3.5 Integration of land use and infrastructure

Recovery of Greater Christchurch is to be assisted by the integration of land use development with infrastructure by:

...

2. Ensuring that the nature, timing and sequencing of new development are co-ordinated with the development, funding, implementation and operation of transport and other infrastructure in order to:
 - a. optimise the efficient and affordable provision of both the development and the infrastructure;

- b. maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure;
 - c. protect investment in existing and planned infrastructure; ~~and~~
 - d. ensure that new commercial film or video production facilities are connected to reticulated water and wastewater systems; and
 - ~~e.~~ e. ensure new development does not occur until provision for appropriate infrastructure is in place;
3. Providing that the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained;
 4. Only providing for new development that does not affect the efficient operation, use, development, appropriate upgrading and safety of existing strategic infrastructure, including by avoiding noise sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport, unless the activity is within an existing residentially zoned urban area, residential greenfield area identified for Kaiapoi, or residential greenfield priority area identified in Map A (page 6-28) and enabling commercial film or video production activities within the noise contours as a compatible use of this land; and
 5. Managing the effects of land use activities on infrastructure, including avoiding activities that have the potential to limit the efficient and effective, provision, operation, maintenance or upgrade of strategic infrastructure and freight hubs.

Principal reasons and explanation

In order to achieve a co-ordinated and efficient recovery, development of urban areas must be integrated with the provision of infrastructure, including ensuring that existing strategic infrastructure can continue to operate efficiently and effectively. Access for freight movements to and from the major ports in Greater Christchurch must be maintained and enhanced, and not compromised by the location of new urban development.

Priority areas for development are generally clustered to the north, west and south-west of existing urban areas. These areas are all close to existing major infrastructure corridors which connect to the growth areas in the north and Waimakariri District, and to the south and on to Selwyn District. The growth areas have been assessed as having the best potential to accommodate residential and business growth through to 2028 whilst achieving a consolidated urban form and an efficient and orderly provision of infrastructure. It is important that timing and sequencing of development are aligned with funding and implementation of infrastructure. It is also important that new commercial film or video production facilities connect to reticulated water and wastewater systems, to avoid demand for water takes in an overallocated zone and to reduce impacts on the natural environment through discharges.

Strategic infrastructure represents an important regional and sometimes national asset that should not be compromised by urban growth and intensification. Strategic infrastructure such as Christchurch International Airport, the Lyttelton Port of Christchurch, the State Highway and strategic road networks and rail corridors is required to support Greater Christchurch’s recovery through transporting such things as building materials, equipment and personnel. The locational requirements and existing investment in strategic infrastructure means that it is extremely inefficient for them to relocate, and effects of land use on their operation can significantly reduce efficiency and attractiveness as transport options. The operation of strategic infrastructure can affect the liveability of residential developments in their vicinity, despite the application of practicable mitigation measures to address effects, which in turn exerts pressure on the infrastructure to further mitigate their effects. It is better to instead select development options, including activities such as commercial film or video production which are compatible with the strategic infrastructure, where such reverse sensitivity constraints do not exist.

The only exception to the restriction against residential development within the 50dBA LdN airport noise contour is provided for at Kaiapoi.

Within Kaiapoi land within the 50dBA Ldn airport noise contour has been provided to offset the displacement of residences as a result of the 2010/2011 earthquakes. This exception is unique to Kaiapoi and also allows for a contiguous and consolidated development of Kaiapoi.

6.4 Anticipated Environmental Results

...

5. Infrastructure, and urban and rural development, are developed in an integrated manner.

6. The use of existing infrastructure is optimised.

...

19. Development opportunities for a metropolitan recreation facility at 466-482 Yaldhurst Road are provided for.

20. Commercial film or video production activities are enabled to support the regional economy and provide employment opportunities.

DEFINITIONS FOR GREATER CHRISTCHURCH

<p><u>Commercial film or video production</u></p>	<p><u>means activities and buildings associated with the creation of a film or video product where undertaken by a professional production company but excludes any residential activity. It excludes filming by news organisations, students or private individuals.</u></p>
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Noise sensitive activities	<p>means</p> <ul style="list-style-type: none"> • Residential activities other than those in conjunction with rural activities that comply with the rules in the relevant district plan as at 23 August 2008; • Education activities including pre-school places or premises, but not including flight training, trade training or other industry related training facilities located within the Special Purpose (Airport) Zone in the Christchurch District Plan; • Travellers' accommodation except that which is designed, constructed and operated to a standard that mitigates the effects of noise on occupants; • Hospitals, healthcare facilities and any elderly persons housing or complex. <p><u>But does not include:</u></p> <ul style="list-style-type: none"> • <u>Commercial film or video production activity.</u>
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Appendix 2: Amendments to CDP

(Text proposed to be inserted is shown in red underlined while deletions are shown ~~red struck through~~.)

Chapter 2 Definitions

Commercial film or video production

means activities and buildings associated with the creation of a film or video product where undertaken by a professional production company but excludes any residential activity. It excludes filming by news organisations, students or private individuals.

Sensitive activities

means:

- a. residential activities, unless specified below;
- b. care facilities;
- c. education activities and preschools, unless specified below;
- d. guest accommodation, unless specified below;
- e. health care facilities which include accommodation for overnight care;
- f. hospitals; and
- g. custodial and/or supervised living accommodation where the residents are detained on the site;

but excludes in relation to airport noise:

- h. any residential activities, in conjunction with rural activities that comply with the rules in the relevant district plans as at 23 August 2008;
- i. flight training or other trade and industry training activities located on land zoned or legally used for commercial activities or industrial activities, including the Specific Purpose (Airport) Zone;

j. commercial film or video production activities; and

~~j-k~~ guest accommodation which is designed, constructed and operated to a standard to mitigate the effects of aircraft noise on occupants.

Chapter 3 Strategic Objectives

3.3.7 Objective -- Urban growth, form and design

- a. A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that:

...

- iii. Provides for urban activities only:
 - A. within the existing urban areas unless they are otherwise expressly provided for in the CRPS; and
 - B. on greenfield land on the periphery of Christchurch's urban area identified in accordance with the Greenfield Priority Areas in the Canterbury Regional Policy Statement Chapter 6, Map A; and ...

Chapter 6 General Rules and Procedures

6.1 Noise

6.1.7.2.2 Activities near Christchurch Airport

- a. The following activity standards apply to new buildings and additions to existing buildings located within the 55 dB Ldn air noise contour or the 55 dB Ldn engine testing contour shown on the planning maps:
 - i. Any new buildings and/or additions to existing buildings shall be insulated from aircraft noise and designed to comply with the following indoor design sound levels:
 - A. Residential units:
 - I. Sleeping areas – 65 dB LAE/40 dB Ldn
 - II. Other habitable areas – 75 dB LAE /50 dB Ldn
 - B. Guest accommodation, resort hotels, hospitals and health care facilities:
 - I. Relaxing or sleeping - 65 dB LAE /40 dB Ldn
 - II. Conference meeting rooms - 65 dB LAE / 40 dB Ldn
 - III. Service activities – 75 dB LAE /60 dB Ldn
 - C. Education activities:
 - I. Libraries, study areas – 65 dB LAE /40 dB Ldn
 - II. Teaching areas, assembly areas – 65 dB LAE /40 dB Ldn
 - III. Workshops, gymnasiums – 85 dB LAE /60 dB Ldn
 - D. Retail activities, commercial services and offices:
 - I. Conference rooms – 65 dB LAE /40 dB Ldn
 - II. Private offices – 70 dB LAE /45 dB Ldn
 - III. Drafting, open offices, exhibition spaces - 75 dB LAE /50 dB Ldn

- IV. Typing, data processing – 80 dB LAE /55 dB Ldn
- V. Shops, supermarkets, showrooms - 85 dB LAE /60 dB Ldn

E. Sound stages and studios for filming and/or sound production for Commercial film or video production activities - 47 dB LAE

- ii. Noise insulation calculations and verification shall be as follows:
 - A. Building consent applications shall be accompanied with a report detailing the calculations showing how the required sound insulation and construction methods have been determined.
 - B. For the purpose of sound insulation calculations, the external noise levels for a site shall be determined by application of the air noise contours Ldn and LAE. Where a site falls within the contours the calculations shall be determined by linear interpolation between the contours.
 - C. If required by the Council, in conjunction with the final building inspection the sound transmission of the façade shall be tested in accordance with ISO 16283-3:2016 to demonstrate that the required façade sound insulation performance has been achieved, and a test report is to be submitted to the Council’s Head of Building Consenting (or any subsequent equivalent position). Should the façade fail to achieve the required standard then it shall be improved to the required standard and re-tested prior to occupation.

Chapter 15 Commercial

15.2 Objectives and Policies

15.2.7.1 Policy - Diversity of activities

- a. Enhance and revitalise the Commercial Central City Mixed Use Zone by enabling:
 - ...
 - vi. light service industry and commercial film or video production activity compatible with other activities envisaged for the zone; and ...

15.9 Rules - Commercial Mixed Use Zone

15.9.1.1 Permitted Activities

	Activity	Activity specific standards
P1	Any new building or addition to a building for any permitted activity listed in Rule 15.9.1.1 P3 to P8 and P11 to P27 below.	Nil
...
P29	<u>Commercial film or video production</u>	<u>Nil</u>

15.11 Rules - Commercial Central City Mixed Use Zone

15.11.1.1 Permitted activities

	Activity	Activity specific standards
P1	Retail activity	...
...
P22	<u>Commercial film or video production</u>	<u>Nil</u>

Chapter 16 Industrial

16.2 Objectives and Policies

16.2.1.4 Policy - Activities in industrial zones

- a. Maintain and support the function of industrial zones while, subject to Clauses (b) and (c), providing for limited non-industrial activities that:
 - i. are ancillary in scale (subject to Clause (d)) and on the same site as a permitted or consented activity;
 - ii. are not appropriate in more sensitive environments due to their potential noise, odour or other environmental effects;
 - iii. incorporate characteristics that are compatible with the industrial zone and do not cause an undue constraint on other permitted activities within the zone;
 - iv. comprise yard based supplier or trade suppliers in the Industrial General Zone;

...

16.4 Rules - Industrial General Zone

16.4.1.1 Permitted activities

	Activity	Activity specific standards
P1	Any new building or addition to a building for any activity listed in Rule 16.4.1.1 P2 to P21.	Nil
...
P22	<u>Commercial film or video production</u>	<u>Nil</u>

16.5 Rules - Industrial Heavy Zone

16.5.1.1 Permitted activities

	Activity	Activity specific standards
P1	Any new building or addition to a building for any activity listed in Rule 16.5.1.1 P2 to P18.	Nil
...
P19	<u>Commercial film or video production</u>	<u>Nil</u>

16.6 Rules - Industrial Park Zone

16.6.1.1 Permitted activities

	Activity	Activity specific standards
P1	Any new building or addition to a building for any activity listed in Rule 16.6.1.1 P2 to P18.	Nil
...
P19	<u>Commercial film or video production</u>	<u>Nil</u>

Chapter 17 Rural

17.2 Objectives and Policies

17.2.2.1 Policy - Range of activities on rural land

- a. Provide for the economic development potential of rural land by enabling a range of activities that:
 - i. have a direct relationship with, or are dependent on, the rural resource, rural productive activity or sea-based aquaculture;
 - ii. have a functional, technical or operational necessity for a rural location; or

- iii. recognise the historic and contemporary relationship of Ngai Tahu with land and water resources;
- iv. provide for commercial film or video production activities and facilities on the rural flat land close to the main Christchurch urban area; and
- ~~v. iv-~~ represent an efficient use of natural resources.

17.5 Rules - Rural Urban Fringe Zone

17.5.1.1 Permitted activities

	Activity	Activity specific standards
P1	Farming	...
...
<u>P20</u>	<u>Commercial film or video production</u>	<ul style="list-style-type: none"> a. <u>The minimum site area for the activity shall be 6ha.</u> b. <u>The site shall be connected to reticulated water and wastewater.</u>

17.5.1.3 Restricted discretionary activities

- a. The activities listed below are restricted discretionary activities.

...

Activity		The Council's discretion shall be limited to the following matters:
RD1	<ul style="list-style-type: none"> a. Any activity listed in Rule 17.5.1.1 P1 - P19 and Rule 17.5.1.3 RD2 - RD9 that does not meet one or more of the built form standards in Rule 17.5.2, unless otherwise specified. ... 	As relevant to the built form standard that is not met: <ul style="list-style-type: none"> a. Building height – Rule 17.11.1.1; ...
...
<u>RD11</u>	<ul style="list-style-type: none"> a. <u>Any activity listed in Rule 17.5.1.1 P20 that does not meet activity specific standard a.</u> 	<ul style="list-style-type: none"> a. <u>Site area – Rule 17.11.2.18</u>

17.5.1.5 Non-complying activities

- b. The activities listed below are non-complying activities.

Activity

NC1	Any activity not provided for as a permitted, controlled, restricted discretionary, discretionary or prohibited activity.
...	...
NC6	<u>Any activity listed in Rule 17.5.1.1 P20 that does not meet activity specific standard b.</u>

17.5.2 Built form standards - Rural Urban Fringe Zone

17.5.2.6 Site coverage

The maximum percentage of the net site area, and the maximum total area, covered by buildings, impervious surfaces and outdoor storage areas shall be as follows:

	Activity	Standard
i.	Buildings and outdoor storage areas on sites greater than 4ha in area	5% of the net site area or 2,000m ² whichever is lesser
ii.	Buildings, impervious surfaces and outdoor storage areas on existing sites between 0.4 and 4ha in area	10% of the net site area or 2,000m ² whichever is the lesser
iii.	Buildings, impervious surfaces and outdoor storage areas on existing sites less than 0.4ha in area	35% of net site area
iv.	<u>For Commercial Film or Video Production activity on sites greater than 4ha in area:</u> 1. <u>Buildings</u> 2. <u>Total coverage by buildings, impervious surfaces, and outdoor storage</u>	<u>5% of the net site area</u> <u>40% of the net site area</u>

17.5.2.7 Vehicle trips

The maximum number of vehicle trips per site for all activities, other than for farming or Commercial Film or Video Production, shall be 100 per day.

17.5.2.9 Landscaping

For any Commercial Film or Video Production activity landscaping and trees shall be provided as follows:

	Standard
i.	<u>The minimum percentage of the site to have landscaping shall be 10%, excluding those areas required to be set aside for trees within or adjacent to parking areas (refer to clause (iv) below).</u>
ii.	<u>The area adjoining the road frontage of all sites shall have a landscaping strip in accordance with the following standards.</u> A. <u>Minimum width - 3 metres</u>

	B. <u>Minimum density of tree planting – 1 tree for every 10 metres of road frontage or part thereof.</u>
iii.	<u>On sites adjoining a residential zone, there shall be a landscaping strip along the shared boundary in accordance with the following standards.</u> A. <u>Minimum width - 3 metres</u> B. <u>Minimum density of tree planting – 1 tree for every 10 metres of boundary or part thereof.</u>
iv.	<u>In addition to clauses (i), (ii) and (iii) above, where parking areas are located at the front of a site, 1 tree shall be planted for every 5 car parking spaces within any car parking area.</u>
v.	<u>All landscaping/ trees required for these rules shall be in accordance with the provisions in Appendix 6.11.6 of Chapter 6.</u>

17.10 Rules - Rural Templeton Zone

17.10.1 Activity status tables - Rural Templeton Zone

	Activity	Activity specific standards
P1	Templeton rural activity	...
...
P5	<u>Commercial film or video production</u>	a. <u>The minimum site area for the activity shall be 6ha.</u> b. <u>The site shall be connected to reticulated water and wastewater.</u>

17.10.1.3 Restricted discretionary activities

a. The activities listed below are restricted discretionary activities.

...

Activity		The Council's discretion shall be limited to the following matters:
RD1	a. Any activity listed in Rule 17.10.1.1 P1 – P4 that does not meet one or more of the built form standards in Rule 17.10.2, except as provided for in Rule 17.10.1.5 below. ...	As relevant to the built form standard that is not met: a. Building height – Rule 17.11.1.1; ...
RD2	a. <u>Any activity listed in Rule 17.10.1 P5 that does not meet activity specific standard a.</u>	a. <u>Site area – Rule 17.11.2.18</u>

17.10.1.5 Non-complying activities

b. The activities listed below are non-complying activities.

	Activity
NC1	Any activity not provided for as a permitted, controlled, restricted discretionary, discretionary or prohibited activity.
NC2	Development and use of land not in accordance with the Templeton Development Plan in Appendix 17.12.2, <u>except for Commercial Film or Video Production activity.</u>
...	...
<u>NC6</u>	<u>Any activity listed in Rule 17.10.1.1 P5 that does not meet activity specific standard b.</u>
<u>NC67</u>	Buildings, impervious surfaces and outdoor storage areas in the Rural Templeton Business 1 and Rural Templeton Facilities Precincts in excess of 30% of the net site area.
<u>NC78</u>	Buildings, impervious surfaces and outdoor storage areas in the Rural Templeton Business 2 Precinct in excess of 20% of the net site area.
<u>NC9</u>	<u>Buildings, impervious surfaces and outdoor storage areas for a Commercial Film or Video Production activity in any precinct in excess of 50% of the net site area.</u>
...	...

17.10.2 Built form standards - Rural Templeton Zone

17.10.2.4 Site coverage

a. The maximum percentage of the net site area covered by buildings, impervious surfaces and outdoor storage areas shall be as follows:

	Applicable to	Standard
i.	Buildings, impervious surfaces and outdoor storage areas in the Rural Templeton Business 1 and Rural Templeton Facilities Precincts	Less than 20% of net site area
ii.	Buildings, impervious surfaces and outdoor storage areas in the Rural Templeton Business 2 Precinct	Less than 10% of net site area
<u>iii.</u>	<u>Buildings, impervious surfaces and outdoor storage areas for a Commercial Film or Video Production activity in any precinct</u>	<u>Less than 40% of net site area</u>

17.10.2.7 Vehicle trips

- a. The maximum number of vehicle trips per site for all non-rural activities, except for Commercial Film or Video Production activities, shall be 100 per day.
- b. Any application arising from this rule shall not be publicly notified.

17.11 Rules – Matters of Discretion

17.11.1 Matters of discretion for built form standards

17.11.1.13 Landscaping and trees

- a. The visual effects of buildings taking account of their scale and appearance, outdoor storage areas, car parking areas or other activities as a result of reduced landscaping.
- b. The extent to which the site is visible from adjoining residential sites and/or identified arterial roads fulfilling a gateway function and the likely consequences of any reduction in landscaping or screening on the amenity of those sites/roads.
- c. Whether there are any compensating factors for reduced landscaping or screening, including the nature or scale of planting proposed or the location of parking areas or manoeuvring areas.
- d. The extent to which the proposal is consistent with the anticipated amenity of the zone.
- e. The extent to which tree planting under the electricity transmission network would adversely affect the safe and efficient functioning of the electricity network or restrict maintenance of that network.
- f. The extent to which indigenous species are used to recognise and enhance Ngāi Tahu/manua whenua cultural values, particularly where development is located within a Site of Ngāi Tahu Cultural Significance identified in Appendix 9.5.6.
- g. The extent to which stormwater facilities are integrated into landscaped areas to achieve a multi-value approach.
- h. The appropriateness and placement of landscaping having regard to the potential adverse effects on safety for pedestrians and vehicles and the functional requirements of the activity.

17.11.2 Matters of discretion for activity specific standards

17.11.2.18 Site area

- a. Whether the smaller site area will enable the site to remain dominated by open space and landscaping rather than buildings, hard surfaces and outdoor storage areas.
- b. The extent to which the activity on a smaller site will impact on rural character and amenity values.
- c. Whether the size or location of the site will adversely impact on the ability to achieve a consolidated urban area.
- d. The ability of the activity to locate on another larger site or on an urban site.

Appendix 3: CRPS Provision Analysis

Definitions

Definition	Analysis
<p>Brownfield means abandoned or underutilised business land, or land no longer required by a requiring authority for a designated purpose.</p>	
<p>Greenfield development means subdivision, use and/or development of land identified on Map A as a Greenfield Priority Area.</p>	
<p>Rural activities means activities of a size, function, intensity or character typical of those in rural areas and includes:</p> <ul style="list-style-type: none"> • Rural land use activities such as agriculture, aquaculture, horticulture and forestry. • Businesses that support rural land use activities. • Large – footprint parks, reserves, conservation parks and recreation facilities. • Residential activity on lots of 4 ha or more. • Quarrying and associated activities. • Strategic infrastructure outside of the existing urban area and priority areas for development. 	<p>Historical debate over application of this definition and need to ensure that it is not undermined for consistent application across the region.</p> <p>This type of activity is not a direct fit for this definition as it is a business that is not directly needed to support rural land use, and while it is likely to have large open areas and good landscaping it is not a public amenity like a park or reserve.</p>
<p>Urban activities means activities of a size, function, intensity or character typical of those in urban areas and includes:</p> <ul style="list-style-type: none"> • Residential units (except rural residential activities) at a density of more than one household unit per 4 ha of site area; • Business activities, except those that fall within the definition of rural activities; • Sports fields and recreation facilities that service the urban population (but excluding activities that require a rural location); • Any other land use that is to be located within the existing urban area or new Greenfield Priority Area. 	<p>This type of activity has a better fit under this definition as a business activity.</p>
<p>Noise sensitive activities means</p> <ul style="list-style-type: none"> • Residential activities other than those in conjunction with rural activities that comply with the rules in the relevant district plan as at 23 August 2008; • Education activities including pre-school places or premises, but not including flight training, trade training or other industry related training 	<p>It is appropriate to ensure that film production activity is clearly understood to not be a ‘noise sensitive activity’. This is linked to the understanding that this activity does not need to incorporate residential activity and so would be suitable to operate in some areas with higher noise levels such as within airport noise contours.</p>

Definition	Analysis
<p>facilities located within the Special Purpose (Airport) Zone in the Christchurch District Plan;</p> <ul style="list-style-type: none"> • Travellers' accommodation except that which is designed, constructed and operated to a standard that mitigates the effects of noise on occupants; • Hospitals, healthcare facilities and any elderly persons housing or complex. 	

Objectives

Objective	Analysis
<p>5.2.1 Location, design and function of development (Entire Region)</p> <p>Development is located and designed so that it functions in a way that:</p> <ol style="list-style-type: none"> 1. achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth; and 2. enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which: <ol style="list-style-type: none"> a. maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values; b. provides sufficient housing choice to meet the region's housing needs; c. encourages sustainable economic development by enabling business activities in appropriate locations; d. minimises energy use and/or improves energy efficiency; e. enables rural activities that support the rural environment including primary production; f. is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure; g. avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure; h. facilitates the establishment of papakāinga and marae; and i. avoids conflicts between incompatible activities. 	<p>Depending on location a proposed film production facility may or may not be consolidated around existing urban areas. By its nature (large buildings, moderate-high vehicle movements) this activity may not always be compatible with some urban areas e.g. residential or commercial centres.</p> <p>A film production facility can be well designed and laid out. This type of activity provides for regional growth in employment thus contributing to the wellbeing of people and the community. If well located and designed a film production facility should maintain natural environment values.</p> <p>This type of activity enables business development and thus contributes to sustainable economic development.</p> <p>An activity of this scale may utilise some productive rural land and thus remove rural use/potential for that land, but it is unlikely that there would be a proliferation of these activities taking up large rural areas.</p> <p>Depending on design this type of development may be able to minimise energy use and impacts on infrastructure.</p> <p>In terms of detailed design, this type of development should be able to avoid adverse effects on the surrounding environment and</p>

Objective	Analysis
	<p>avoid conflict with other activities.</p> <p>Overall, this type of activity is generally consistent with this objective (depending on specific site location and development design).</p>
<p>5.3.7 Strategic land transport network and arterial roads (Entire Region)</p> <p>In relation to strategic land transport network and arterial roads, the avoidance of development which:</p> <ol style="list-style-type: none"> 1. adversely affects the safe efficient and effective functioning of this network and these roads, including the ability of this infrastructure to support freight and passenger transport services; and 2. in relation to the strategic land transport network and arterial roads, to avoid development which forecloses the opportunity for the development of this network and these roads to meet future strategic transport requirements. 	<p>Depending on a specific site location a film production facility may or may not be an issue for these road types but should be able to be designed to avoid or minimise adverse effects.</p>
<p>6.2.1 Recovery framework</p> <p>Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:</p> <ol style="list-style-type: none"> 1. identifies priority areas for urban development within Greater Christchurch; 2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design; 3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS; 4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development; 5. protects and enhances indigenous biodiversity and public space; 6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air; 7. maintains the character and amenity of rural areas and settlements; 8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise; 9. integrates strategic and other infrastructure and services with land use development; 10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs; 11. optimises use of existing infrastructure; and 	<p>A film production facility would contribute to rebuilding and future development / growth of the district and region.</p> <p>A development of this type may not be within a priority area – especially as much of that land is now occupied / unavailable, and this scale of development would not be appropriate within a KAC.</p> <p>This type of activity could be considered to be urban development outside existing urban areas if located in rural zones and is not currently expressly provided for in the CRPS at this time.</p> <p>If well located and designed a film production facility should maintain natural environment / landscapes and should be able to be designed to fit with servicing and water/air quality, as well as infrastructure and transport network.</p> <p>If well located and designed a film production facility should maintain character and amenity for the environment in which it is located.</p>

Objective	Analysis
<p>12. provides for development opportunities on Māori Reserves in Greater Christchurch.</p>	<p>This type of activity should not be located in an area at risk from natural hazards.</p> <p>Overall, this type of activity is generally consistent with this objective (depending on specific site location and development design).</p>
<p>6.2.2 Urban form and settlement pattern</p> <p>The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by:</p> <ol style="list-style-type: none"> 1. aiming to achieve the following targets for intensification as a proportion of overall growth through the period of recovery: <ol style="list-style-type: none"> a. 35% averaged over the period between 2013 and 2016 b. 45% averaged over the period between 2016 to 2021 c. 55% averaged over the period between 2022 and 2028; 2. providing higher density living environments including mixed use developments and a greater range of housing types, particularly in and around the Central City, in and around Key Activity Centres, and larger neighbourhood centres, and in greenfield priority areas and brownfield sites; 3. reinforcing the role of the Christchurch central business district within the Greater Christchurch area as identified in the Christchurch Central Recovery Plan; 4. providing for the development of greenfield priority areas on the periphery of Christchurch’s urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure; 5. encouraging sustainable and self-sufficient growth of the towns of Rangiora, Kaiapoi, Woodend, Lincoln, Rolleston and Prebbleton and consolidation of the existing settlement of West Melton; 6. Managing rural residential development outside of existing urban and priority areas; and 7. Providing for development opportunities on Māori Reserves. 	<p>A film production facility would contribute to recovery and future growth.</p> <p>A development of this type does not need to affect residential areas or commercial centres or goals for the central city.</p> <p>It is likely that this scale of development would not easily fit into a greenfield priority area, given many of those areas are occupied now.</p> <p>A film production facility would be appropriate in a range of areas including some rural areas.</p>

Objective	Analysis
<p>6.2.3 Sustainability Recovery and rebuilding is undertaken in Greater Christchurch that:</p> <ol style="list-style-type: none"> 1. provides for quality living environments incorporating good urban design; 2. retains identified areas of special amenity and historic heritage value; 3. retains values of importance to Tāngata Whenua; provides a range of densities and uses; and 4. is healthy, environmentally sustainable, functionally efficient, and prosperous. 	<p>A film production facility should be able to locate and be designed to ensure this objective is met.</p>
<p>6.2.4 Integration of transport infrastructure and land use Prioritise the planning of transport infrastructure so that it maximises integration with the priority areas and new settlement patterns and facilitates the movement of people and goods and provision of services in Greater Christchurch, while:</p> <ol style="list-style-type: none"> 1. managing network congestion; 2. reducing dependency on private motor vehicles; 3. reducing emission of contaminants to air and energy use; 4. promoting the use of active and public transport modes; 5. optimising use of existing capacity within the network; and 6. enhancing transport safety. 	<p>A film production facility should be able to be located and designed to achieve this objective.</p>
<p>6.2.5 Key activity and other centres Support and maintain the existing network of centres below as the focal points for commercial, community and service activities during the recovery period:</p> <ol style="list-style-type: none"> 1. The Central City 2. Key Activity Centres 3. Neighbourhood centres. <p>These centres will be high quality, support a diversity of business opportunities including appropriate mixed-use development, and incorporate good urban design principles. The development and distribution of commercial activity will avoid significant adverse effects on the function and viability of these centres.</p>	<p>This is not the type of activity to locate in a commercial centre (given land availability and pricing) and so does not threaten the outcomes sought under this objective.</p>

Objective	Analysis
<p>6.2.6 Business land development Identify and provide for Greater Christchurch’s land requirements for the recovery and growth of business activities in a manner that supports the settlement pattern brought about by Objective 6.2.2, recognising that:</p> <ol style="list-style-type: none"> 1. The greenfield priority areas for business in Christchurch City provide primarily for the accommodation of new industrial activities; 2. Except where identified for brownfield redevelopment, areas used for existing industrial activities are to be used primarily for that purpose, rather than as a location for new commercial activities; 3. New commercial activities are primarily directed to the Central City, Key Activity Centres, and neighbourhood centres; 4. A range of other business activities are provided for in appropriate locations; and 5. Business development adopts appropriate urban design qualities in order to retain business, attract investment and provide for healthy working environments. 	<p>A film production facility is not inherently or by definition an industrial or commercial activity but would be compatible with some of these zones. It also could fit well in greenfield priority or brownfield areas.</p> <p>This type of facility is unlikely to fit in a commercial centre given the land size requirement and prices of land.</p> <p>It would fit as an ‘other business’ under this objective, and there is no specific provision for it to operate in any particular location currently and there is no appropriate location identified at present.</p> <p>A film production facility should be able to use appropriate urban design in a development proposal.</p>

Policies

Policy	Analysis
<p>6.3.1 Development within the Greater Christchurch area In relation to recovery and rebuilding for Greater Christchurch:</p> <ol style="list-style-type: none"> 1. give effect to the urban form identified in Map A, which identifies the location and extent of urban development that will support recovery, rebuilding and planning for future growth and infrastructure delivery; 2. give effect to the urban form identified in Map A (page 6-27) by identifying the location and extent of the indicated Key Activity Centres; 3. enable development of existing urban areas and greenfield priority areas, including intensification in appropriate locations, where it supports the recovery of Greater Christchurch; 4. ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the CRPS; 5. provide for educational facilities in rural areas in limited circumstances where no other practicable options exist within an urban area; 6. provide for a metropolitan recreation facility at 466-482 Yaldhurst Road; and 7. avoid development that adversely affects the function and viability of, or public investment in, the Central City and Key Activity Centres. 	<p>If defined as urban development, a film production facility would not currently fit this policy where located in a rural area as it is not presently expressly provided for. This can be amended to align with approach taken for Canterbury Sports Ltd at Yaldhurst site and include ‘express provision’.</p> <p>A film production facility would fit this policy if located on a greenfield priority or brownfield site or in a number of commercial zones</p>

Policy	Analysis
<p>6.3.2 Development form and urban design</p> <p>Business development, residential development (including rural residential development) and the establishment of public space is to give effect to the principles of good urban design below, and those of the NZ Urban Design Protocol 2005, to the extent appropriate to the context:</p> <ol style="list-style-type: none"> 1. Tūrangawaewae – the sense of place and belonging – recognition and incorporation of the identity of the place, the context and the core elements that comprise the Through context and site analysis, the following elements should be used to reflect the appropriateness of the development to its location: landmarks and features, historic heritage, the character and quality of the existing built and natural environment, historic and cultural markers and local stories. 2. Integration – recognition of the need for well-integrated places, infrastructure, movement routes and networks, spaces, land uses and the natural and built environment. These elements should be overlaid to provide an appropriate form and pattern of use and development. 3. Connectivity – the provision of efficient and safe high quality, barrier free, multimodal connections within a development, to surrounding areas, and to local facilities and services, with emphasis at a local level placed on walking, cycling and public transport as more sustainable forms of 4. Safety – recognition and incorporation of Crime Prevention Through Environmental Design (CPTED) principles in the layout and design of developments, networks and spaces to ensure safe, comfortable and attractive places. 5. Choice and diversity – ensuring developments provide choice and diversity in their layout, built form, land use housing type and density, to adapt to the changing needs and circumstances of the population. 6. Environmentally sustainable design – ensuring that the process of design and development minimises water and resource use, restores ecosystems, safeguards mauri and maximises passive solar gain. 7. Creativity and innovation – supporting opportunities for exemplar approaches to infrastructure and urban form to lift the benchmark in the development of new urban areas in the Christchurch region. 	<p>A film production facility should be able to be designed to fit these principles.</p>
<p>6.3.3 Development in accordance with outline development plans</p> <p>Development in greenfield priority areas and rural residential development is to occur in accordance with the provisions set out in an outline development plan or other rules for the area. Subdivision must not proceed ahead of the incorporation of an outline development plan in a district plan. Outline development plans and associated rules will: ...</p>	<p>If located in a greenfield priority area, then this policy applies. For any site investigated there may be an ODP already applicable to the site – if so, this activity may not fit that ODP or may fit well. This is an issue that would need to be worked through on a site/proposal specific basis.</p>

Policy	Analysis
<p>6.3.4 Transport effectiveness Ensure that an efficient and effective transport network that supports business and residential recovery is restored, protected and enhanced so that it maintains and improves movement of people and goods around Greater Christchurch by:</p> <ol style="list-style-type: none"> 1. avoiding development that will overload strategic freight routes; 2. providing patterns of development that optimise use of existing network capacity and ensuring that, where possible, new building projects support increased uptake of active and public transport, and provide opportunities for modal choice; 3. providing opportunities for travel demand management; 4. requiring integrated transport assessment for substantial developments; and 5. improving road user safety. 	<p>Alignment with this policy depends on site location for any specific development. This policy will provide guidance to a proposal to ensure it is well located to avoid unreasonable impact on network, freight routes, high demand areas, etc.</p>
<p>6.3.5 Integration of land use and infrastructure Recovery of Greater Christchurch is to be assisted by the integration of land use development with infrastructure by:</p> <ol style="list-style-type: none"> 1. Identifying priority areas for development to enable reliable forward planning for infrastructure development and delivery; 2. Ensuring that the nature, timing and sequencing of new development are co-ordinated with the development, funding, implementation and operation of transport and other infrastructure in order to: <ol style="list-style-type: none"> a. optimise the efficient and affordable provision of both the development and the infrastructure; b. maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure; c. protect investment in existing and planned infrastructure; and d. ensure new development does not occur until provision for appropriate infrastructure is in place; 3. Providing that the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained; 4. Only providing for new development that does not affect the efficient operation, use, development, appropriate upgrading and safety of existing strategic infrastructure, including by avoiding noise sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport, unless the activity is within an existing residentially zoned urban area, residential greenfield area identified for Kaiapoi, or residential greenfield priority area identified in Map A (page 6-28); and 5. Managing the effects of land use activities on infrastructure, including avoiding activities that have the potential to limit the efficient and effective, provision, 	<p>A film production facility should be able to fit infrastructure needs and elements of this policy.</p> <p>It is appropriate to provide direction that any such activities should be reticulated for water and sewer, to avoid additional impact on environment through septic tanks or demand for water takes in an overallocated area.</p> <p>Film production would be an appropriate activity to occur in noise sensitive areas as it is naturally noisy in some respects, and otherwise ensure sound proofing anyway (on the basis that residential activity is not part of this operation).</p>

Policy	Analysis
<p>operation, maintenance or upgrade of strategic infrastructure and freight hubs.</p>	
<p>6.3.6 Business land</p> <p>To ensure that provision, recovery and rebuilding of business land in Greater Christchurch maximises business retention, attracts investment, and provides for healthy working environments, business activities are to be provided for in a manner which:</p> <ol style="list-style-type: none"> 1. Promotes the utilisation and redevelopment of existing business land, and provides sufficient additional greenfield priority area land for business land through to 2028 as provided for in Map A; 2. Recognises demand arising from the relocation of business activities as a result of earthquake-damaged land and buildings; 3. Reinforces the role of the Central City, as the city’s primary commercial centre, and that of the Key Activity Centres; 4. Recognises that new commercial activities are primarily to be directed to the Central City, Key Activity Centres and neighbourhood centres where these activities reflect and support the function and role of those centres; or in circumstances where locating out of centre, will not give rise to significant adverse distributional or urban form effects; 5. Recognises that new greenfield priority areas for business in Christchurch City are primarily for industrial activities, and that commercial use in these areas is restricted; 6. Recognises that existing business zones provide for a range of business activities depending on: <ol style="list-style-type: none"> i. the desired amenity of the business areas and their surrounds; and ii. the potential for significant distributional or urban form effects on other centres from new commercial activity. 7. Utilises existing infrastructure availability, capacity and quality; 8. Ensures reverse sensitivity effects and conflicts between incompatible activities are identified and avoided or mitigated against; 9. Ensures close proximity to labour supply, major transport hubs and passenger transport networks; 10. Encourages self-sufficiency of employment and business activities within communities across Greater Christchurch; 11. Promotes, where appropriate, development of mixed-use opportunities, within Key Activity Centres provided reverse sensitivity issues can be appropriately managed; and 12. Incorporates good urban design principles appropriate to the context of the development. 	<p>A film production facility would meet the intent to support recovery and growth, maximise business, attract investment etc.</p> <p>Alignment with this policy depends on the location selected for a proposal but any such development should be generally compatible with a range of business zones and should be able to be designed to fit these policy outcomes.</p> <p>A film production facility should be able to meet provisions relating to infrastructure, effects, access, and urban design principles.</p>
<p>6.3.7 Residential location, yield and intensification</p>	<p>n/a</p>

Policy	Analysis
<p>6.3.8 Regeneration of brownfield land To encourage and provide for the recovery and regeneration of existing brownfield areas through new comprehensive residential, mixed-use or business developments, provided such activities will ensure the safe and efficient functioning of the transport network and will not have significant adverse distributional or urban form effects on the Central City, Key Activity Centres and neighbourhood centres, or give rise to significant reverse sensitivity effects.</p>	<p>A film production facility would fit with this policy.</p>
<p>6.3.9 Rural residential development</p>	<p>n/a</p>
<p>6.3.10 Māori Reserves</p>	<p>n/a</p>
<p>6.3.11 Monitoring and Review</p>	<p>n/a</p>

Appendix 4: CDP Provision Analysis

Definitions

Definition	Analysis
<p>Brownfield means abandoned or underutilised commercial or industrial land, or land no longer required by a requiring authority for a designated purpose.</p>	
<p>Commercial activities means retail activities, offices and commercial services. It excludes industrial activities, high technology industrial activities and heavy industrial activities.</p>	
<p>Commercial film or video production means activities associated with the creation of a film or video product where undertaken by a professional production company. It excludes filming by news organisations, students or private individuals.</p>	<p>This current definition is a good fit for the proposed activity, and it is appropriate to continue to apply this existing definition. It would be useful to explicitly include 'buildings' in this definition to make clear that it is the structures involved as well as the activity itself.</p> <p>It would be appropriate to explicitly exclude residential activity within the definition as that could be incompatible in some otherwise appropriate zones or lead to reverse sensitivity effects.</p>
<p>Industrial activity 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>	
<p>Sensitive activities means:</p> <ul style="list-style-type: none"> a. residential activities, unless specified below; b. care facilities; c. education activities and preschools, unless specified below; d. guest accommodation, unless specified below; e. health care facilities which include accommodation for overnight care; f. hospitals; and g. custodial and/or supervised living accommodation where the residents are detained on the site; <p>but excludes in relation to airport noise:</p>	<p>Appropriate to explicitly exclude film production from this definition to ensure it is not considered a sensitive activity and recognise that it can be appropriate in noise sensitive areas.</p>

Definition	Analysis
<ul style="list-style-type: none"> h. any residential activities, in conjunction with rural activities that comply with the rules in the relevant district plans as at 23 August 2008; i. flight training or other trade and industry training activities located on land zoned or legally used for commercial activities or industrial activities, including the Specific Purpose (Airport) Zone; and j. guest accommodation which is designed, constructed and operated to a standard to mitigate the effects of aircraft noise on occupants. 	
<p>Templeton rural activity means the use of land and/or buildings within the Rural Templeton Zone for:</p> <ul style="list-style-type: none"> a. farming; b. activities that directly and primarily service farming, including offices and the warehousing (excluding general freight or distribution activities), wholesale and retail activity of rural supplies or rural produce; c. food and beverage outlets, excluding taverns; d. private parks, reserves and recreation facilities; e. a limited number of residential units for security/custodial purposes; f. boarding of domestic animals; and g. rural research facilities and laboratories that do not have an education or health care component. 	<p>This bespoke definition applies to the specific zone designed with limited outcomes in mind, but the zone is comparable with surrounding rural zoning and the film production activity would have similar character to the activities anticipated.</p>

Strategic Objectives

Objective	Analysis
<p>3.3.1 Objective - Enabling recovery and facilitating the future enhancement of the district</p> <ul style="list-style-type: none"> a. The expedited recovery and future enhancement of Christchurch as a dynamic, prosperous and internationally competitive city, in a manner that: <ul style="list-style-type: none"> i. Meets the community’s immediate and longer term needs for housing, economic development, community facilities, infrastructure, transport, and social and cultural wellbeing; and ii. Fosters investment certainty; and iii. Sustains the important qualities and values of the natural environment. 	<p>The film production activity would fit this objective in terms of providing for economic development and community wellbeing.</p>

<p>3.3.5 Objective - Business and economic prosperity</p> <p>a. The critical importance of business and economic prosperity to Christchurch’s recovery and to community wellbeing and resilience is recognised and a range of opportunities provided for business activities to establish and prosper.</p>	<p>The film production activity would fit this objective in terms of contributing to economic development and community wellbeing. At present there is no specific opportunity provided in the District Plan, within the zones and rules, for this specific business type to establish.</p>
<p>3.3.6 Objective -- Natural hazards</p> <p>a. New subdivision, use and development (other than new critical infrastructure or strategic infrastructure to which paragraph b. applies):</p> <p>i. is to be avoided in areas where the risks from natural hazards to people, property and infrastructure are assessed as being unacceptable; and</p> <p>ii. in all other areas, is undertaken in a manner that ensures the risks of natural hazards to people, property and infrastructure are appropriately mitigated. ...</p>	<p>A film production activity can be located to achieve this objective.</p>
<p>3.3.7 Objective -- Urban growth, form and design</p> <p>a. A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that:</p> <p>i. Is attractive to residents, business and visitors; and</p> <p>ii. Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and</p> <p>iii. Provides for urban activities only:</p> <p>C. within the existing urban areas; and</p> <p>D. on greenfield land on the periphery of Christchurch’s urban area identified in accordance with the Greenfield Priority Areas in the Canterbury Regional Policy Statement Chapter 6, Map A; and</p> <p>iv. Increases the housing development opportunities in the urban area to meet the intensification targets specified in the Canterbury Regional Policy Statement, Chapter 6, Objective 6.2.2 (1); particularly:</p> <p>A. in and around the Central City, Key Activity Centres (as identified in the Canterbury Regional Policy Statement), larger neighbourhood centres, and nodes of core public transport routes; and</p>	<p>A film production activity can be located and designed to meet this objective generally.</p> <p>As currently worded clause iii. of this objective restricts the location of film production activity to existing urban areas and greenfield land. The current wording does not provide for an activity to be ‘<i>expressly provided for</i>’ as is the wording used in the CRPS. This gap needs to be amended to enable such express provision, to give effect to the CRPS. Such amendment would also align with the change that has already occurred for the Yaldhurst site and is appropriate for this limited and compatible activity.</p> <p>A film production activity would fit in brownfield land, a range of commercial zones and the industrial zones.</p>

<ul style="list-style-type: none"> B. in those parts of Residential Greenfield Priority Areas identified in Canterbury Regional Policy Statement Chapter 6, Map A; and C. in suitable brownfield areas; and v. Maintains and enhances the Central City, Key Activity Centres and Neighbourhood Centres as community focal points; and vi. Identifies opportunities for, and supports, the redevelopment of brownfield sites for residential, business or mixed use activities; and vii. Promotes the re-use and re-development of buildings and land; and viii. Improves overall accessibility and connectivity for people, transport (including opportunities for walking, cycling and public transport) and services; and ix. Promotes the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure; and x. Co-ordinates the nature, timing and sequencing of new development with the funding, implementation and operation of necessary transport and other infrastructure. 	
<p>3.3.10 Objective - Commercial and industrial activities</p> <ul style="list-style-type: none"> a. The recovery and stimulation of commercial and industrial activities in a way that expedites recovery and long-term economic and employment growth through: <ul style="list-style-type: none"> i. Enabling rebuilding of existing business areas, revitalising of centres, and provision in greenfield areas; and ii. Ensuring sufficient and suitable land development capacity. 	<p>The activity would fit this objective in providing economic development.</p>
<p>3.3.14 Objective - Incompatible activities</p> <ul style="list-style-type: none"> a. The location of activities is controlled, primarily by zoning, to minimise conflicts between incompatible activities; and b. Conflicts between incompatible activities are avoided where there may be significant adverse effects on the health, safety and amenity of people and communities. 	<p>A film production activity should be able to be located and designed to meet this objective.</p>
<p>3.3.16 Objective - A productive and diverse rural environment</p> <ul style="list-style-type: none"> a. A range of opportunities is enabled in the rural environment, primarily for rural productive activities, and also for other activities which use the rural resource 	<p>This objective is aimed at rural production but also recognises the potential for <i>'other activities which use the rural resource efficiently and contribute positively to the economy'</i>. Such provision supports this type of activity that is</p>

<p>efficiently and contribute positively to the economy.</p> <p>b. The contribution of rural land to maintaining the values of the natural and cultural environment, including Ngai Tahu values, is recognised.</p>	<p>able to contribute to economic growth and employment.</p>
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Commercial Zone

Objectives and Policies	Analysis
<p>15.2.1 Objective - Recovery of commercial activity</p> <p>a. The critical importance of commercial activity to the recovery and long term growth of the City is recognised and facilitated in a framework that supports commercial centres.</p>	<p>The provision for film production activities will support this objective.</p>
<p>15.2.2 Objective - Centres-based framework for commercial activities ...</p>	<p>A film production activity is not a commercial activity by definition albeit sharing some compatibly characteristics. Such activity is unlikely to fit into one of the commercial centres given the scale of land and buildings required.</p>
<p>15.2.3 Objective - Office parks and mixed use areas</p> <p>a. Recognise the existing nature, scale and extent of commercial activity within the Commercial Office and Commercial Mixed Use Zones, but avoid the expansion of existing, or the development of new, office parks and/or mixed use areas.</p> <p>15.2.3.1 Policy - Office parks</p> <p>a. Recognise and enable office activities in the existing Addington and Russley office parks that are within the Commercial Office Zone.</p> <p>15.2.3.2 Policy - Mixed use areas</p> <p>a. Recognise the existing nature, scale and extent of retail activities and offices in Addington, New Brighton, off Mandeville Street and adjoining Blenheim Road, while limiting their future growth and development to ensure commercial activity in the City is focussed within the network of commercial centres.</p>	<p>A film production activity would be compatible with the outcomes anticipated for the office parks and mixed use zones. These areas expect a mixture of activities that are sensitive to those around them and this type of activity can fit into such an environment and provide high amenity spaces through large areas of landscaping.</p>
<p>Most of the rest of the objectives and policies step through the intent for each type of commercial zone and the outcomes anticipated. None of the other commercial zones are an obvious fit for this type of activity.</p>	
<p>15.2.7 Objective - Role of the Commercial Central City Mixed Use Zone</p> <p>a. The development of vibrant urban areas where a diverse and compatible mix of activities can coexist in support of the</p>	<p>A film production activity would be compatible with the outcomes anticipated for the Commercial Central City Mixed Use Zone which is designed to provide for a wide range of activities</p>

Commercial Central City Business Zone and other areas within the Central City.	that can operate together and bring revitalisation to this area.
<p>15.2.7.1 Policy - Diversity of activities</p> <p>a. Enhance and revitalise the Commercial Central City Mixed Use Zone by enabling:</p> <ul style="list-style-type: none"> i. a wide range of activities and a continuation of many of the existing business activities; ii. a range of types of residential activities to transition into this area in support of inner city residential intensification; iii. forms of retailing that support business and other activity within the zone, are consistent with consolidating retail activity in the Commercial Central City Business Zone, or are less suited to the Commercial Central City Business Zone environment; iv. large format retail activity to continue in parts of the zone where that form of retailing has previously existed and/or to an extent that does not threaten the consolidation of retail activity in the Commercial Central City Business Zone; v. opportunities for offices and commercial services in association with other business and residential activity, or where it is of a small scale so as to not compromise the role of the Commercial Central City Business Zone or the aim of consolidating that area of the Central City; vi. light service industry compatible with other activities envisaged for the zone; and vii. entertainment activities and hospitality activities of a scale, type and duration that do not conflict with or undermine existing and future residential activity, nor undermine the identified hospitality and entertainment precincts. 	The nature of this policy is quite specific in outlining the types of activities expected to operate and thus there is a need for inclusion of a specific provision within the policy that shows that film production activity is appropriate within this zone.

Industrial Zone

Objectives and Policies	Analysis
<p>16.2.1 Objective - Recovery and growth</p> <p>a. The recovery and economic growth of the district's industry is supported and strengthened in existing and new greenfield industrial zones.</p>	The provision for film production activities will support this objective.
<p>16.2.1.1 Policy - Sufficient land supply</p> <p>a. Maintain a sufficient supply of industrial zoned land to meet future demand up to</p>	N/A

<p>2028, having regard to the requirements of different industries, and to avoid the need for industrial activities to locate in non-industrial zones.</p>	
<p>16.2.1.2 Policy - Enable the development of industrial areas to support recovery</p> <p>a. Encourage the redevelopment of existing industrial zones for industrial activities, particularly in areas that have lost industry and associated employment opportunities due to the earthquakes.</p>	<p>The provision for film production activities will support this objective.</p>
<p>16.2.1.3 Policy - Range of industrial zones</p> <p>a. 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 as follows:</p> <p>i. Industrial General Zone</p> <p>A. 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.</p> <p>ii. Industrial Heavy Zone</p> <p>A. 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.</p> <p>iii. Industrial Park Zone</p> <p>A. Recognise and provide for industrial activities in the high technology sector and other industries in a high amenity environment dominated by open space and landscaping, and that generate higher volumes of traffic than other industries while having negligible effects in terms of noise, odour or the use and storage of hazardous substances.</p>	<p>A film production activity would have characteristics not unlike those seen in an industrial general or heavy zone, and would be compatible with anticipated and existing activities in many industrial areas.</p> <p>The higher amenity values expressed by the Industrial Park Zone would also be a good location for film production activity.</p>
<p>16.2.1.4 Policy - Activities in industrial zones</p> <p>a. Maintain and support the function of industrial zones while, subject to Clauses (b) and (c), providing for limited non-industrial activities that:</p>	<p>A film production activity would generally fit with intent of this policy, but given the approach is quite detailed in the types of expected activities, there is a need for it to be amended to explicitly include film production activity as a type of activity that is compatible with the</p>

<ul style="list-style-type: none"> i. are ancillary in scale (subject to Clause (d)) and on the same site as a permitted or consented activity; ii. are not appropriate in more sensitive environments due to their potential noise, odour or other environmental effects; iii. comprise yard based supplier or trade suppliers in the Industrial General Zone; iv. provide an emergency service and/or provide for community activities; v. support the needs of workers and businesses in the zone including food and beverage outlets, commercial services, and the care of children; vi. meet the convenience needs of residents, workers and businesses in the Industrial General Zone (Waterloo Park) in a Local Centre; vii. are rural activities associated with the irrigation of food processing wastewater in the identified area of the Industrial Heavy Zone (South West Hornby) (Appendix 16.8.8) that is integral to the ongoing operation of an established industrial activity. <p>b. Avoid any activity in industrial zones with the potential to hinder or constrain the establishment or ongoing operation or development of industrial activities and strategic infrastructure, or with the potential to be exposed to unacceptable risk. This includes but is not limited to avoiding:</p> <ul style="list-style-type: none"> i. sensitive activities located within the 50 dB Ldn Air Noise Contour, the Lyttelton Port Influences Overlay Area, the Woolston Risk Management Area and in proximity to the National Grid; ii. non-sensitive discretionary or non-complying activities specified by Rule 16.4.1.4 D1, Rule 16.5.1.4, and Rule 16.5.1.5 NC1 in the Woolston Risk Management Area unless the proposed activity in its location meets risk acceptability criteria appropriate to the applicable land use. <p>c. Avoid the use of industrial zones for non-industrial activities that could adversely affect the strategic role of the Central City, District Centres and Neighbourhood Centres as focal points for commercial activities, community activities, residential activities, and other activities.</p>	<p>industrial zone and would not cause undue constraint on other permitted activities.</p>
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<p>d. Provide for ancillary activities, recognising their role in supporting industry, while being incidental in scale and function to a principal activity on the same site, and not inconsistent with Clauses b. and c..</p>	
<p>16.2.2 Objective - Brownfield redevelopment a. The recovery and economic growth of the Christchurch District is provided for by enabling redevelopment, including mixed-use development, of appropriate brownfield sites while not compromising the function of the wider industrial area for primarily industrial activities.</p>	<p>Film production activity would generally fit with this objective.</p>
<p>16.2.2.1 Policy - Brownfield site identification a. Unless a site is identified by a 'brownfield' overlay on the planning maps, a brownfield site shall meet the following criteria: i. the land is abandoned or underutilised industrial land, or no longer required by a requiring authority for a designated purpose; and ii. the redevelopment of the brownfield site will not adversely affect the supply of land to meet anticipated needs of industrial activities to 2028, including industrial activities with specific locational requirements; and iii. the brownfield site is in a location that is not surrounded by industrial activities and/or will not erode the anticipated outcomes, including the function and amenity levels, of those parts of the zone not subject to brownfield redevelopment.</p>	<p>Depending on site location and identification, film production activity would generally fit with this policy.</p>
<p>16.2.3 Objective - Effects of industrial activities a. Adverse effects of industrial activities and development on the environment are managed to support the anticipated outcome for the zone while recognising that sites adjoining an industrial zone will not have the same level of amenity anticipated by the Plan as other areas with the same zoning. b. The cultural values of Ngāi Tahu/ mana whenua are recognised, protected and enhanced through the use of indigenous species in landscaping and tree planting, a multi-value approach to stormwater management in greenfield areas, low impact urban design, and the protection and enhancement of wāhi tapu and wāhi taonga including waipuna.</p>	<p>Film production activity can be designed to meet this objective.</p>
<p>16.2.3.1 Policy - Development in greenfield areas</p>	<p>Film production activity should be able to be designed to meet this policy.</p>

<ul style="list-style-type: none"> a. Manage effects at the interface between greenfield areas and arterial roads, rural and residential areas with setbacks and landscaping. b. Manage the development of greenfield areas in a manner aligned with the delivery of infrastructure, including upgrades to networks, to avoid adverse effects on networks serving these areas. c. Development shall recognise and support Ngāi Tahu cultural values through low impact urban design, the protection of sites of Ngāi Tahu cultural significance identified in Schedule 9.5.6.1, and recognition of other sites of Ngāi Tahu cultural significance identified in Appendix 9.5.6 including waterways, springs, wetlands and sites of indigenous vegetation where practicable. d. Enable the ongoing use of land in the Industrial Heavy Zone (South West Hornby), (identified on Appendix 16.8.8) for rural activities and the associated irrigation of food processing wastewater at South West Hornby as an integral component of the adjoining industrial activity. 	
<p>16.2.3.2 Policy - Managing effects on the environment</p> <ul style="list-style-type: none"> a. The effects of development and activities in industrial zones, including reverse sensitivity effects on existing industrial activities as well as, visual, traffic, noise, glare and other effects, are managed through the location of uses, controls on bulk and form, landscaping and screening, particularly at the interface with arterial roads fulfilling a gateway function, and rural and residential areas, while recognising the functional needs of the activity. b. Effects of industrial activities are managed in a way that the level of residential amenity (including health, safety, and privacy of residents) adjoining an industrial zone is not adversely affected while recognising that it may be of a lower level than other residential areas. c. Development and activities are managed to avoid adverse effects on strategic infrastructure within or in proximity to industrial zones. d. The quantity of wastewater discharged in areas over unconfined or semi-confined aquifers is restricted to minimise any risk of contamination. 	<p>Film production activity should be able to be designed to meet this policy.</p>

<p>e. The cultural values of Ngāi Tahu/mana whenua are recognised and supported through the protection of wāhi tapu and wāhi taonga, including waipuna, from the adverse effects of development, through the use of low impact urban design, use of indigenous species appropriate to the local environment, and stormwater management.</p> <p>f. Development in the Industrial Park Zone is designed and laid out to promote a safe environment and reflects principles of Crime Prevention through Environmental Design (CPTED).</p>	
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Rural Zones

Objectives and Policies	Analysis
<p>17.2.1.1 Objective - The rural environment Subdivision, use and development of rural land that:</p> <p>a. supports, maintains and, where appropriate, enhances the function, character and amenity values of the rural environment and, in particular, the potential contribution of rural productive activities to the economy and wellbeing of the Christchurch District;</p> <p>i. avoids significant, and remedies or mitigates other reverse sensitivity effects on rural productive activities and natural hazard mitigation works;</p> <p>ii. maintains a contrast to the urban environment; and</p> <p>iii. maintains and enhances the distinctive character and amenity values of Banks Peninsula and the Port Hills, including indigenous biodiversity, Ngāi Tahu cultural values, open space, natural features and landscapes, and coastal environment values.</p>	<p>If located in a rural zone, this type of activity could remove the potential for a piece of land to provide for rural productive uses. The market advice is that there is unlikely to be more than one or two of these developments, and not a proliferation of them, so there does not appear to be any risk of large areas of productive land being removed from rural use. Loss of an area of productive land in this case would be balanced by potential economic / employment benefits.</p> <p>A film production activity should be able to be designed to achieve amenity values but would not have rural character per se.</p>
<p>17.2.2.1 Policy - Range of activities on rural land</p> <p>a. Provide for the economic development potential of rural land by enabling a range of activities that:</p> <p>i. have a direct relationship with, or are dependent on, the rural resource, rural productive activity or sea-based aquaculture;</p> <p>ii. have a functional, technical or operational necessity for a rural location; or</p> <p>iii. recognise the historic and contemporary relationship of Ngai Tahu with land and water resources; and</p>	<p>A film production activity is an appropriate activity for the rural areas close to the urban boundary where a range of activities are anticipated and there are various activities already established.</p> <p>Given the scale of land required and the proximity to transport routes, a film production activity has at least in part a functional, technical or operational desire to be in a rural area.</p>

<p>iv. represent an efficient use of natural resources.</p>	
<p>17.2.2.2 Policy - Effects of activities utilising the rural resource</p> <p>a. Ensure that activities utilising the rural resource avoid significant adverse effects on areas of important natural resources and avoid, remedy or mitigate other adverse effects on rural character and amenity values.</p>	<p>A film production activity should be able to be designed to meet this policy.</p>
<p>17.2.2.3 Policy - Contributing elements to rural character and amenity values</p> <p>a. Recognise that rural character and amenity values vary across the Christchurch District resulting from the combination of natural and physical resources present, including the location and extent of established and permitted activities.</p> <p>b. Recognise that the elements that characterise an area as rural, from which desired amenity is derived, include the predominance of:</p> <ul style="list-style-type: none"> i. a landscape dominated by openness and vegetation; ii. significant visual separation between residential buildings on neighbouring properties; iii. where appropriate, buildings integrated into a predominantly natural setting; and iv. natural character elements of waterways, water bodies, indigenous vegetation and natural landforms, including the coastal environment where relevant. <p>c. Recognise that rural productive activities in rural areas can produce noise, odour, dust and traffic consistent with a rural working environment, including farming, plantation forestry and quarrying activities, that may be noticeable to residents and visitors in rural areas.</p>	<p>A film production activity should be able to be designed to meet this policy.</p>
<p>17.2.2.4 Policy - Function of rural areas</p> <p>a. Ensure the nature, scale and intensity of subdivision, use and development recognise the different natural and physical resources, character and amenity values, conservation values and Ngāi Tahu values of rural land in the Christchurch District, including:</p> <ul style="list-style-type: none"> i. the rural productive activities, recreation activities, rural tourism activities and conservation activities on Banks Peninsula and their integrated management with maintaining and 	<p>A film production activity should be able to be designed to meet this policy.</p>

<ul style="list-style-type: none"> enhancing landscape, coastal and indigenous biodiversity values; ii. the rural productive activities and recreation activities in the rural flat land area surrounding the main Christchurch urban area; iii. the flood management and groundwater recharge functions adjoining the Waimakariri River; iv. the open character and natural appearance of the rural Port Hills which maintain distinct urban/rural boundaries v. the re-use of the site of the former Templeton Hospital; vi. the historic and contemporary cultural landscapes, sites of Ngāi Tahu cultural significance and the use of land and water resources for mahinga kai; and vii. the conservation activities undertaken within the Peacock Springs Conservation Area. 	
<p>17.2.2.5 Policy - Establishment of industrial and commercial activities</p> <p>a. Avoid the establishment of industrial and commercial activities that are not dependent on or directly related to the rural resource unless they:</p> <ul style="list-style-type: none"> i. have a strategic or operational need to locate on rural land; or ii. provide significant benefits through utilisation of existing physical infrastructure; and iii. avoid significant, and remedy or mitigate other, reverse sensitivity effects on rural productive activities; iv. will not result in a proliferation of associated activities that are not reliant on the rural resource; and v. will not have significant adverse effects on rural character and amenity values of the local environment or will not cause adverse effects that cannot be avoided, remedied or mitigated. 	<p>Given the scale of land required and the proximity to transport routes, a film production activity has at least in part a strategic or operational desire to be in a rural area. A film production activity should be able to meet the other aspects of this policy.</p>

Activity Status

Zone	Activity Status	Analysis
Commercial Zones		
Commercial Core, Local, Banks Peninsula, Retail Park, Office	<u>Discretionary activity</u> (catch all clause)	While fitting within a discretionary activity status in these zones (default status due to being an 'other' activity), a film production activity would

Zone	Activity Status	Analysis
		not align well with the standards for these zones or the outcomes anticipated.
Commercial Mixed Use	<u>Permitted activity</u> for: <ul style="list-style-type: none"> Industrial activity in the Commercial Mixed Use Zone on Blenheim Road and Main South Road Warehousing and distribution activities Service industry High technology industrial activity Trade and industry training activity Tertiary education and research activities And similar activities within a wide range of activities. <p>Otherwise <u>Discretionary activity</u> (catch all clause)</p>	<p>The permitted activities have similar characteristics to what a film production activity would have in terms of the scale of buildings, traffic movements, etc.</p> <p>Currently the activity would be a discretionary activity status in this zone (default status due to being an ‘other’ activity) which is not well aligned with anticipated activities and effects.</p>
Commercial Central City Business	<u>Discretionary activity</u> (catch all clause)	While fitting within a discretionary activity status in this zone (default status due to being an ‘other’ activity), a film production activity would not align well with the standards for this zone or the outcomes anticipated.
Commercial Central City Mixed Use	<u>Permitted activity</u> for: <ul style="list-style-type: none"> Industrial activities Yard based suppliers Trade suppliers Commercial services And similar activities within a wide range of activities. <p>Otherwise <u>Discretionary activity</u> (catch all clause)</p>	<p>The permitted activities have similar characteristics to what a film production activity would have in terms of the scale of buildings, traffic movements, etc.</p> <p>Currently the activity would be a discretionary activity status in this zone (default status due to being an ‘other’ activity) which is not well aligned with anticipated activities and effects.</p>
Commercial Central City South Frame Mixed Use	<u>Permitted activity</u> for: <ul style="list-style-type: none"> Commercial services Tertiary education and research facilities And similar activities within a wide range of activities. <p><u>Non-complying activity</u> for ‘Industrial activity’</p>	A film production activity would not align well with the standards for this zone or the outcomes anticipated.

Zone	Activity Status	Analysis
Industrial Zones		
Industrial General	<p><u>Permitted activity</u> for:</p> <ul style="list-style-type: none"> • Industrial activity • Warehousing and distribution activities • High technology industrial activity • Service industry • Trade and industry training activity • Ancillary retail activity • Food and beverage outlet • Trade supplier • Yard-based supplier • Service station • Second-hand goods outlets • Ancillary office <p>(plus other similar activities)</p> <p>Otherwise <u>Discretionary activity</u> (catch all clause)</p> <p>Specific rules for Waterloo, Portlink, Musgroves, Stanleys Road, Trents Road, South West Hornby</p> <p>Non-compliance with the ODP's in the specific areas leads to a RDA status</p>	<p>The permitted activities have similar characteristics to what a film production activity would have in terms of the scale of buildings, traffic movements, etc.</p> <p>Currently the activity would be a discretionary activity status in this zone (default status due to being an 'other' activity) which is not well aligned with anticipated activities and effects.</p>
Industrial Heavy	<p><u>Permitted activity</u> for:</p> <ul style="list-style-type: none"> • Industrial activity • Heavy industrial activity • Warehousing and distribution activities • High technology industrial activity • Service industry • Trade and industry training activity <p>(plus other similar activities)</p> <p>Otherwise <u>Non-complying activity</u> (catch all clause)</p> <p>Specific rules for Sir James Wattie Drive, South West Hornby, Springs Road</p>	<p>The permitted activities have similar characteristics to what a film production activity would have in terms of the scale of buildings, traffic movements, etc.</p> <p>Currently the activity would be a non-complying activity status in this zone (default status due to being an 'other' activity) which is not well aligned with anticipated activities and effects.</p>

Zone	Activity Status	Analysis
	Non-compliance with the ODP's in the specific areas leads to a RDA status	
Industrial Park	<p><u>Permitted activity</u> for:</p> <ul style="list-style-type: none"> • Industrial activity • Warehousing and distribution activities • High technology industrial activity • Service industry • Trade and industry training activity • Ancillary retail activity (plus other similar activities) <p>Otherwise <u>Discretionary activity</u> (catch all clause)</p> <p>Specific rules for Tait Campus, Awatea, Wairakei Road, Memorial Avenue</p> <p>Non-compliance with the ODP's in the specific areas leads to a RDA status</p>	<p>The permitted activities have similar characteristics to what a film production activity would have in terms of the scale of buildings, traffic movements, etc.</p> <p>Currently the activity would be a discretionary activity status in this zone (default status due to being an 'other' activity) which is not well aligned with anticipated activities and effects.</p>
Rural Zones		
Rural Banks Peninsula, Waimakariri, Port Hills	<u>Non-complying activity</u> (catch all clause)	A film production activity would not align well with the standards for these zones or the outcomes anticipated.
Rural Urban Fringe	<u>Non-complying activity</u> (catch all clause)	<p>A film production activity would have similar characteristics to many rural activities and existing operations in terms of the scale of buildings, traffic movements, etc.</p> <p>Currently the activity would be a non-complying activity status in this zone (default status due to being an 'other' activity) which is not well aligned with anticipated activities and effects.</p>
Rural Quarry, Quarry Templeton	<u>Non-complying activity</u> (catch all clause)	A film production activity would not align well with the standards for these zones or the outcomes anticipated.
Rural Templeton	<p><u>Permitted activity</u> for:</p> <ul style="list-style-type: none"> • Templeton rural activity in accordance with ODP 	A film production activity would have similar characteristics to many rural activities and existing

Zone	Activity Status	Analysis
	Otherwise <u>Non-complying activity</u> (catch all clause)	operations in terms of the scale of buildings, traffic movements, etc. Currently the activity would be a non-complying activity status in this zone (default status due to being an 'other' activity) which is not well aligned with anticipated activities and effects.
Residential Zones		
All Residential Zones	<u>Discretionary activity</u> (catch all clause)	Despite being a discretionary activity within these zones, a film production activity would not align well with the standards for these zones or the outcomes anticipated.
Specific Purpose Zones		
All Specific Purpose Zones	<u>Discretionary or Non-complying activity</u>	These zones are designed specifically for the particular type of activities that contribute to the purpose of these zones. Other activities are generally not provided for and a film production activity would obviously not fit within the intent for any of these zones.
Open Space Zones		
All Open Space Zones	<u>Discretionary or Non-complying activity</u> (catch all clause)	These zones are designed specifically for the particular type of activities that contribute to the purpose of these zones. Other activities are generally not provided for and a film production activity would obviously not fit within the intent for any of these zones.

Appendix 5: Christchurch District Plan Standards Analysis Summary

Analysis of hypothetical commercial film production activity against existing Christchurch District Plan standards for identified appropriate zones, to assess likely compliance with standards.

	Height	Setback				Recession plane	Site coverage	Outdoor storage	Landscaping	Water supply for fire fighting	Other specific rules	Servicing	Traffic generation	Noise Rules	Film production activity assessment against applicable standards
		Road boundary	Internal boundary	To residential zone boundary	To rail corridor										
Film production activity	Up to 16m	Able to design to fit	Able to design to fit	Able to design to fit			Moderate to low overall site coverage by buildings but reasonable areas of impervious surfaces for carparking	Probably	Generous	Can provide		Reticulation if possible	May be considerable traffic generation at times	Generally buildings expected to be noise insulated but some aspects of the activity may be noisy at times	
Commercial mixed use	15m	3m or 1.5m on one boundary if a corner site	-	3m	4m	Applies at internal boundary	-	Required to be screened by 1.8 metre high fencing or landscaping	Road frontage landscaped to 1.5m width, planted in trees at 1 tree /10m frontage + Residential boundary 1 tree/ 10m boundary + 1 tree/ 5 car parks	Required		-	✓	✓	Good fit with standards applying to this zone. Likely also consent will be required under high trip generator rule (RDA, non-notified).
Commercial central city mixed use	Heights determined on Central City height plan depending on the location.	-	-	3m	-	-	-	Locate storage to rear of building or screen to 1.8m high	Road frontage landscaped to 2m width, planted in trees at 1 tree /10m frontage + 5% of total site area in landscaping + Residential boundary 1 tree/ 10m boundary	Required	Flexibility in building design to accommodate future change of use Fencing and screening requirements	-	✓	✓	Good fit with standards applying to this zone as it is a very enabling zone. Likely also consent will be required under high trip generator rule (RDA, non-notified).
Industrial general	15m if located within 20m of residential zone	1.5m or 3m if on an arterial road or opposite residential zone	-	3m	4m	Applies	-	Do not position in setbacks and screen to 1.8m high	Road frontage landscaped to 1.5m width, planted in trees at 1 tree /10m frontage + Residential boundary 1 tree/ 10m boundary	Required	Landscaping required on boundary with specific zones (Note other specific rules for stated areas - non-compliance with the ODP's in the stated areas lead to a RDA status)		✓	✓	Good fit with standards applying to this zone. Likely also consent will be required under high trip generator rule (RDA, non-notified).

	Height	Setback				Recession plane	Site coverage	Outdoor storage	Landscaping	Water supply for fire fighting	Other specific rules	Servicing	Traffic generation	Noise Rules	Film production activity assessment against applicable standards
		Road boundary	Internal boundary	To residential zone boundary	To rail corridor										
Industrial heavy	15m if located within 20m of residential zone	1.5m or 3m if arterial road or opposite residential zone	-	3m	-	Applies	-	Screened by 1.8 metre high fencing or landscaping	Road frontage landscaped to 1.5m width, planted in trees at 1 tree /10m frontage + Opposite rural zone 10m landscape strip and trees 1 tree / 10m frontage + Residential boundary 1 tree/ 10m boundary	Required	Landscaping required on boundary with specific zones (Note other specific rules for stated areas - non-compliance with the ODP's in the stated areas lead to a RDA status)	✓	✓	Good fit with standards applying to this zone. Likely also consent will be required under high trip generator rule (RDA, non-notified).	
Industrial park	Buildings 15m Fences and screens 1.2m or 2m if 50% transparent	6m (with specific reductions)		6m	4m	-	50% of net site area by buildings	Do not position in setbacks and screen to 1.8m high Carparking to be located at rear of site	10% of total site area in landscaping + Road frontage landscaped to 1.5m width, planted in trees at 1 tree /10m frontage + Residential boundary 1 tree/ 10m boundary + 1 tree/ 5 car parks	Required	(Note other specific rules for stated areas - non-compliance with the ODP's in the stated areas lead to a RDA status)	✓	✓	Good fit with standards applying to this zone. The standards have higher expectations of amenity than other industrial zones to recognise higher amenity outcomes anticipated for this zone. Likely also consent will be required under high trip generator rule (RDA, non-notified).	
Rural urban fringe	9m generally 12m for farm buildings	15m generally 6m if site less than 0.4ha 30m for sites on major / minor arterial road or state highway	10m generally 3m if site less than 0.4ha 25m for new residential buildings	-	4m	-	Over 4ha = 5% of the net site area or 2,000m ² whichever is lesser Sites between 0.4 and 4ha in area = 10% of the net site area or 2,000m ² whichever is the lesser Sites less than 0.4ha in area = 35% of net site area	-	-	Required	Separation distances for residential and sensitive activities from intensive farming. The maximum number of vehicle trips per site for all activities, other than for farming, shall be 100 per day.	✓	✓	Moderate fit with standards applying to this zone. Would need consent under specific traffic rule applying to this zone (RDA) as well as the district wide high trip generator rule, which appears unnecessary for this particular activity type. Reliance on the high trip generator rule should be sufficient to achieve appropriate management through an ITA. Proposals may need consent for building height (depending on proposal) and it is reasonable to have this to protect different character of rural area (RDA). Proposals may need consent for site coverage under current rules	

	Height	Setback				Recession plane	Site coverage	Outdoor storage	Landscaping	Water supply for fire fighting	Other specific rules	Servicing	Traffic generation	Noise Rules	Film production activity assessment against applicable standards
		Road boundary	Internal boundary	To residential zone boundary	To rail corridor										
															<p>which seems very restrictive for this intentionally low density type activity - could amend to 5% total building coverage without the footprint restriction (and total coverage with impervious surfaces) and achieve appropriate outcomes.</p> <p>Would benefit from introduction of:</p> <ul style="list-style-type: none"> - Site area rule to keep activities to larger scale; - Requirement to provide reticulation to protect environment; and - Landscaping rule for film production activities to ensure minimum landscaping outcomes are achieved.
Rural Templeton	9m	-	5-10m from internal or precinct boundaries	5+20m from zone boundary	-	-	10-20% for buildings, impervious surfaces and outdoor storage	-	20% for each allotment up to 2,000m ² + existing trees + 20m landscape buffer with no parking or storage in it	Required	Must be in accordance with ODP. The maximum number of vehicle trips per site for all non-rural activities shall be 100 per day.	Restrictions	✓	✓	<p>Moderate fit with standards applying to this zone, although opportunities limited through bespoke zone provisions with limited flexibility.</p> <p>Currently application of ODP to specified activities. This strictly sets out layout and expectations to fit the intended development style from the rezoning. Current rules mean that not meeting the ODP is automatically a non-complying activity. Proposed solution is to list film production as a separate activity that is not required to meet ODP, with standards that achieve the same outcomes as those achieved by the ODP still applying to ensure effects are comparable and appropriate.</p> <p>Proposals may need consent for building height and/or site coverage (depending on proposal) and it is considered reasonable to have these rules continue to protect different character of rural area (RDA).</p> <p>Would benefit from introduction of:</p> <ul style="list-style-type: none"> - Site area rule to keep activities to larger scale; and

	Height	Setback				Recession plane	Site coverage	Outdoor storage	Landscaping	Water supply for fire fighting	Other specific rules	Servicing	Traffic generation	Noise Rules	Film production activity assessment against applicable standards
		Road boundary	Internal boundary	To residential zone boundary	To rail corridor										
															<p>- Requirement to provide reticulation to protect environment.</p> <p>Likely also consent will be required under high trip generator rule (RDA, non-notified).</p>

Appendix 6: Summary of other Film Production Sites in New Zealand

Comparative analysis of some existing / proposed Film Studios

Film Studio	Site size	Number of buildings and structures	Use of buildings/structures	Building footprint	Building height	Acoustic features	Traffic type/volume	Car parking	Other features	Zoning
Auckland Film Studios, Henderson [IMAGE A]	42,500m ²	Total: Three studios and six multi-purpose buildings	Studio Large industrial-looking building. Use for filming/stage area	Between 784m ² – 1924m ² . Total studio area 3,576m ² ,	Studio 1, 2 - 10.6m to apex	Studio 1, 2 - Sound proofed – 17db Studio 5 – 50dB	Cars, trucks (TBC)	Refer plan	Lighting grids Studio 5 – makeup, green room, costume area, toilets and showers. The site is secure with perimeter fencing, controlled entry and plentiful parking.	Auckland Unitary Plan – Business Light Industry
			Office Makeup, Casting, Greens, Locations, Safety, Stunts, costume, sound, production, accounts, Art department	2,151m ²	TBC	TBC				
			Canopy Construction/props storage, wet weather production area	2,050m ²	TBC	TBC				
			Workshop Lighting, catering, construction, permanent tenants: Propeller props hire, Maxminx prop maker, and A Bright Idea costume designer. A number of suppliers to productions also operate from AFS including construction managers, caterers, film scouts/location managers and production office equipment hire.	2,254m ²	TBC	TBC				
Kumeu Film Studios [IMAGE B]	269,925m ²	2	Sound stages (one in studio, one separate)	2,336m ² each	14m internal height	Unclear on acoustic treatment, but requirement to comply with noise standards in consent: 55dB LAeq most of the time.	Cars, trucks Max number of vehicles on site 250 per day (consent condition). If that number will be exceeded, consent holder must have an approved travel demand management plan.	(TBC)	12 hectares of forest Max number of people on site cannot exceed 500 people (consent condition)	Auckland Unitary Plan – Business Light Industry (Non-complying)
			Warehouse stage area	4,036m ²	9-11m height					
			Workshop and manufacture space/secondary stage area	6160m ²	TBC					
			Production offices	1215m ²	TBC					

Film Studio	Site size	Number of buildings and structures	Use of buildings/structures	Building footprint	Building height	Acoustic features	Traffic type/volume	Car parking	Other features	Zoning
		1	Permanent green screen	70mx13m, surface area of 920m2						
		3	Water tanks Temporary stunt rehearsal tank, underwater dive tank covered), ocean surface tank (outdoor)	Underwater tank Vol: 1.2m l Diameter: 18m Max depth: 4.9m Water treatment system - Ocean Surface tank Vol: 2.5m l Length: 36m – 54m Width: 40m Chlorine treatment						
Studio West, Auckland [IMAGE C]	32,500m2	Total: 7 buildings.	3 studios (with a large new studio/office space to come) Fully lined clear span sound stage, 3-phase power, 200 amps per phase, complete lighting grid, baffled variable speed air extractor fan.	1 – 312m2 2 – 252m2 3 – 700m2	~9m	Studio 3 - acoustic tile roofing. Consent noise limits: 65dB LAeq – Business zone boundary. 5dB LAeq – Residential zone boundary. Requirement for acoustically effective fence.	Cars, trucks (TBC)	New studio includes a lot of extra parking (TBC)	-	Auckland Unitary Plan – Business Light Industry
			Production offices 8 individual offices, reception area, green room, bathroom/toilets, kitchen facilities, alarmed, safe, fibre optic cabling and air conditioning.	475m2	-					
			Work+Paint shop A large open plan workshop, specialising in prop making. A spray room, moulding room, drying room, roller door access	252m2	-					
			Monster Shop Open plan, purpose-built workshop, air extraction, includes certified spray booth.	140m2	-					
			Costume/Art Department Multi purpose building, large open plan work spaces, with individual offices, laundry, kitchen, fitting rooms, furnished, high speed broadband, air conditioning.	300m2	-					
			Carpentry shop 3 Bay workshop. 3m x 4m high roller door access. Easy access for trucks and parking. Polycarbonate panels allowing extra light. Single and three phase power.	462m2	-					
			Green rooms, lunchrooms, locations office	300m2	-					
Temple Studios	250,000m2	9 buildings (6 studios)	Studios	Each studio: 2400m ²	Each studio: 16m high at the apex	The ideal internal noise level for film is	Cars, trucks (TBC)	411 parks proposed	Existing buildings on the site, previously	Christchurch District Plan

Film Studio	Site size	Number of buildings and structures	Use of buildings/structures	Building footprint	Building height	Acoustic features	Traffic type/volume	Car parking	Other features	Zoning
[IMAGE D]			Three buildings consisting of two studios, connected by covered accessway suitable of housing three trucks side-by-side.			NC25(LAmax) to minimise disruption to filming. Under flight path		2 accesses from Kirk Road	Westmount School, will be utilised and re-purposed for use by Temple Studios. Total hardstanding coverage will be approximately 69,756m	Rural Templeton
			Workshop/offices	2000m2	(TBC – existing buildings)					
			Gym/wetstage	750m2	(TBC – existing buildings)					
			Backlot	120,000m2	(TBC – existing buildings)					
Stone Street, Wellington [IMAGE E]	5,413m2	Two large buildings (looks like they are connected to smaller buildings) 4 sound stages 7 blocks 1 large Greens screen and Backlot area	K Stage The largest purpose-built fully soundproofed stage. It comes equipped with house lighting, power outlets and compressed air reticulation. The stage has an air handling system for fresh air and extraction, a grid of catwalks for set and lighting rigs, plus a grid level dimmer room and three purpose-built rails for green, white and solid screens. A Stage has been partially soundproofed to achieve a reverb time of approx 1.2 seconds. The stage has been equipped with an air extraction system, compressed air reticulation, an aircooling system and a grid of catwalks for set and lighting rigs. Includes three purpose-built rails for green, white and solid screens. The attached covered annex (3900sq ft) has been used by previous productions for either truck access or for still shoots. F+G Stages Fully sound proofed stage space each with an air handling system for fresh air and extraction, a grid of catwalks for set and lighting rigs, a grid level dimmer room and three purpose-built rails for green, white and solid screens.	K Stage: 24,100sq ft A Stage: 12,600sq ft F+G Stages: 17,500sq ft	Between 10 – 16m	Full – partial sound proofing	Cars, trucks (further details: TBC)	Carparking on site (number TBC)	-	Business 2
			Block D – multi purpose Block B is an adapted warehouse. It has brick/concrete walls and an iron roof. It is not soundproof but has material on exterior of roof to reduce rain noise. It has a power board output capacity of 280 kilowatts, standard warehouse lighting, power outlets and compressed air reticulation. Rate includes a certified painting room.	1505m2						
			Block C – paint shop Set painting and Art Department area with roller door access to the Backlot and adjacent to Block B. Rate includes certified painting booth, a casting booth, compressed air reticulation and three phase power. Includes kitchen and toilet facilities.	442m2						
			Blocks D and E – Warehouses Blocks D & E are multi use warehouses. They have access to Block 5 Art Department offices and Block E has access to catering and greens area, as well as F Stage and Block D.	~1100m2						
			Blocks H and J – Warehouses	~1400m2						

Film Studio	Site size	Number of buildings and structures	Use of buildings/structures	Building footprint	Building height	Acoustic features	Traffic type/volume	Car parking	Other features	Zoning
			Blocks H & J are two adjoining warehouse spaces. Block H Warehouse is typically used as a construction warehouse and has access to Kong Stage and G Stage. Block E Warehouse is typically used as a construction workshop with offices, kitchen, toilet facilities and storage.							
			Block 2 – Construction Block 7 provides construction workspace that includes offices, kitchen and toilet facilities and 3phase power and compressed air. There is exterior yard space and access from both Block C and from Stone Street.	500m2						
			Block 7 – Construction Block 7 provides construction workspace that includes offices, kitchen and toilet facilities and 3phase power and compressed air. There is exterior yard space and access from both Block C and from Stone Street.	200m2						
			Block 6 – Art Department Block 6 provides space for props making and storage with standard warehouse lighting, power outlets and compressed air. There is an additional laundry for fabric dyeing and drying.	200m2						
			Backlots Green screen	50,000sq ft with 50,000sq ft parking area						
			Office Blocks 1, 4 and 5	~1700m2						
			Block 2 and 3 Costume props, laundry and make=up	~700m2						

IMAGE A: Auckland Film Studios, Henderson



IMAGE B: Kumeu Film Studios

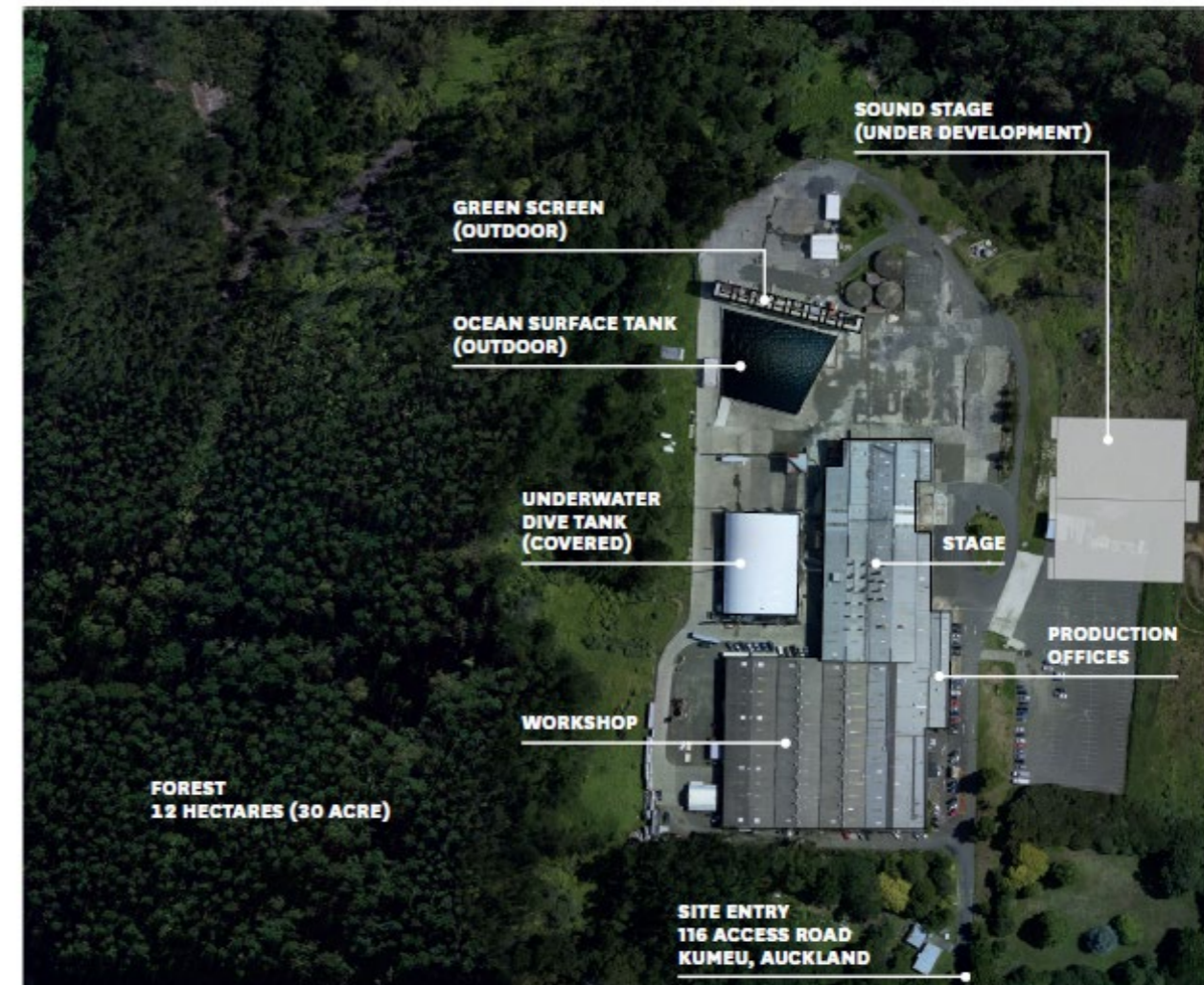


IMAGE C: Studio West, Auckland

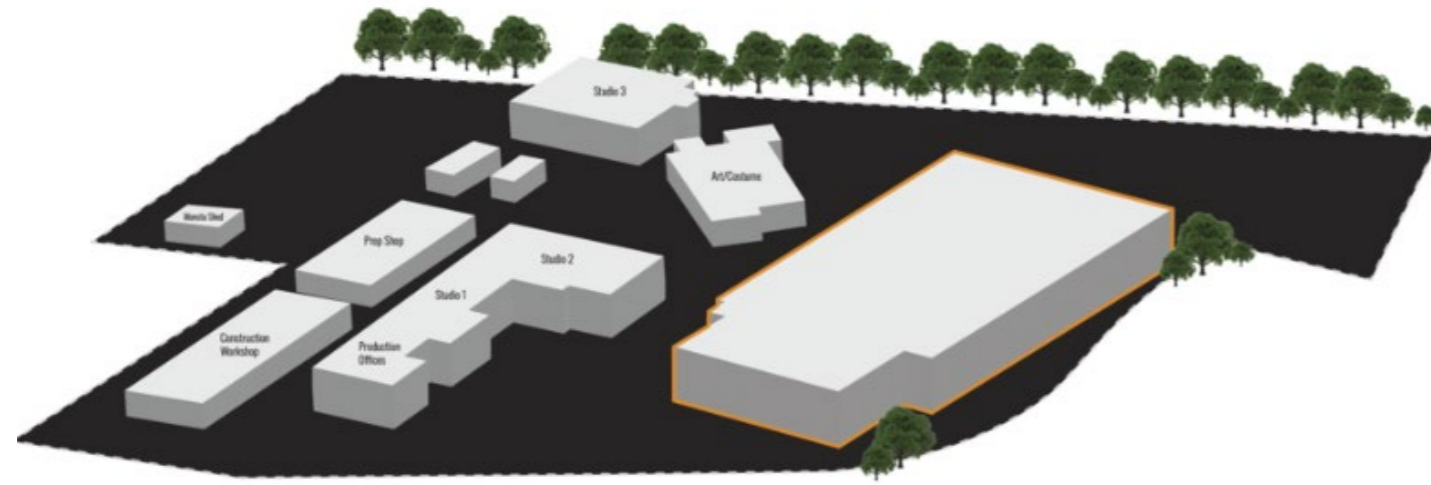


IMAGE D: Proposed Temple Studios



IMAGE E: Stone Street, Wellington

