

## Summary of written comments

A summary is provided below of the themes or issues raised through the public written comments.

### **Key themes arising from comments in support of the Proposal**

In general, comments that support the Proposal were aligned on the positive economic, educational and employment benefits of securing the activities in Christchurch. Several comments referred to specific proposals to build a studio development, but comments were largely focused on the option to build studios generally.

We note that, while many of the supportive comments came from people based in Christchurch, a notable portion also came from people in other locations around New Zealand.

A number of the commenters also appear to work in the industry or in supporting industries, while comments were also received from institutions or industry bodies such as the Australia New Zealand Screen Association (#155), the New Zealand Broadcasting School (#144), and the University of Canterbury (#153).

Key themes are summarised below:

- Christchurch is well-suited to support the film industry (as the gateway to the South Island and its varied locations, with infrastructure such as an international airport, accommodation and educational facilities, and with an existing talent/expertise base to support the industry).
- However, without commercial film or video production facilities Christchurch is missing out on opportunities to capitalise on real and increasing interest in New Zealand as a safe location for film production.
- The Proposal would help to develop the film industry in the region and diversify the Canterbury economy, with positive flow-on effects for a range of businesses and jobs for years to come.
- For those who work or are training in the industry, or in related fields, the expansion of opportunities and income streams in Christchurch would be appreciated.
- It would also provide wider benefits for the creative, hospitality and technological industries, support training and education, and increase the profile of Christchurch and the South Island, supporting tourism. It would make Christchurch more vibrant and fun.
- There are wider regional and national benefits to providing greater optionality and diversity within the New Zealand market. A film studio hub in the South Island, where there is space to expand, is an opportunity to attract more international film activity for New Zealand as a whole.
- The Proposal's approach makes sense and is needed as soon as possible to grow new economic activity as Christchurch continues to recover from the earthquakes and the impacts of COVID-19.

For example, some typical excerpts follow:

- *"I see this as a no brainer. We have the space and the access to an international airport as well as the most stunning scenery and suitable areas for shooting movies, TV*

series, and videos. It would provide a wonderful opportunity for talented kiwis living in the region and it will provide jobs. It will provide a wonderful boost to ChCh which is still struggling after the earthquakes.” (#27)

- “We train people in Christchurch for a career in the film industry, but once trained they have to leave our city in order to work in the field. They take that expertise with them and we lose both that and them.” (#73)
- “There is currently great talent in Christchurch within the film industry but there is little to no facilities to support us. This will help put Christchurch on the map for serious productions both nationally and internationally.” (#92)
- “I think this is a great opportunity to increase commercial and tourism activity as well as creativity in Christchurch and Canterbury. The sooner this can be initiated the better!” (#4)
- “It will allow the South Island to capitalise on the popularity of its locations and landscape to create an economically positive impact which will bring jobs to Greater Christchurch and Canterbury.” (#9)
- “The region has so much to offer in terms of incredible locations but it’s crucial we have film studio to facilitate these future productions. If there is a chance to fast-track planning decisions to build a studio in Christchurch, in particular the Templeton Studios, I will happily welcome the proposed change.” (#34)
- “As the last few years have shown, demand for local and international productions has increased and the South Island does not currently have the facilities to accommodate these demands, studios in the North Island are continuously busy so having more options would be a great thing for Christchurch and the New Zealand film and television industry.” (#8)
- “Currently, there is a global shortfall of screen infrastructure which has caused some major production companies to take out multi-year leases on soundstages. New facilities in Christchurch can therefore be expected to receive significant interest. That interest will be further bolstered by the beauty and variety of outdoor locations in the area surrounding Christchurch, as well as the quality and talent of New Zealand’s screen practitioners, and New Zealand’s stability, safety and security.” (#155)

#### Comments provided by strategic partners

We note that the comments in support of the Proposal include letters from two strategic partners – Christchurch City Council (#143) and Canterbury Regional Council (#146). The GCR Act requires you to have particular regard to any views received from the strategic partners through the written comment period.

Both of the strategic partners were broadly supportive of the Proposal, noting (for example):

- Christchurch City Council: “The Council is supportive of the Proposal ... and considers that it will provide a range of benefits to the Christchurch District and the wider region. ... An enabling regulatory environment is of great importance as we consider how best to attract investment and facilitate the recovery of greater Christchurch in response to the impacts of Covid-19.”
- Canterbury Regional Council: “Environment Canterbury recognises the potential economic and employment benefits commercial film or video production activities

*could bring to Christchurch and the wider sub-region, and supports the overall intent of the Proposal to better enable this opportunity while ensuring that the effects of the activity are properly managed through appropriate planning provisions. Environment Canterbury supports the exercise of powers under section 71.”*

As noted below, Canterbury Regional Council also provided several discrete comments.

#### Any discrete issues noted by comments supporting the Proposal

We note that several of the comments identified above, while supporting the Proposal in general, raised discrete issues, preferences or recommendations. These include that:

- Canterbury Regional Council expressed a preference for a different numbering system for additional provisions, and noted it is unclear why the addition to Policy 6.3.5(4) and associated supporting text, which relates to the airport noise contours, is needed (**#146**).

*(We note the second comment had also been raised during the earlier stage of comments, and is in the concise statement of views prepared by Regenerate Christchurch (DPMC-2019/20-1012 refers). In response, Regenerate Christchurch noted it considered it was appropriate to be clear that the activity is not a ‘noise sensitive activity’);*

- One commenter noted a preference for eastern Christchurch to be the location for the facilities (**#79**);
- Some comments noted preferred design or operating arrangements for the facilities – for example:
  - One commenter noted that the facilities need to have power and cable access for broadcast trucks to park outside, or preferably a loading dock for trucks to drive inside and be secure overnight (**#84**); and
  - One commenter noted that pornographic film studios must have a licence and be monitored, and that areas for loud music and stunt work should be provided (**#142**).

#### ***Issues raised by comments opposing the Proposal***

##### Use of GCR Act powers at this stage in regeneration

One commenter considers that, “ten years after the earthquake, it is time to stop using the special powers granted to the central government and switch back to normal processes.” He clarifies that he is “not against developing a film studio”, but is concerned that “a government-driven process is not likely to produce an optimal outcome” (**#59**).

##### Relationship to the Woolston Risk Management Area overlay in industrial zones

Two comments were received from oil and gas companies – from Liquigas Limited (**#150**) and from three oil companies, jointly (**#151**). The two comments are largely similar, with both parties opposing the Proposal on the grounds that:

- The Proposal would allow the activities to be undertaken as a permitted activity within two zones (Industrial Heavy and Industrial General) which are subject to the Woolston Risk Management Area Overlay surrounding bulk fuel and gas terminals in Woolston;
- Permitted activity status would remove consideration of the potential risks those activities might be subject to by locating within the Risk Management Area, and therefore has the potential to:
  - expose the activities to unacceptable health and safety risks; and
  - constrain the development, operating, upgrading or maintenance of both the terminals (i.e. creating reverse sensitivity effects);
- Approving the Proposal would therefore create unacceptable risks and reverse sensitivity effects, and could potentially undermine the environmental, economic and social wellbeing or resilience of Christchurch communities; and
- It could also make the Canterbury Regional Policy Statement inconsistent with Objective 1 of the National Policy Statement on Urban Development 2020, and result in wording that inaccurately describe the activities as compatible with all strategic infrastructure and not giving rise to reverse sensitivity constraints.

Both comments therefore seek that you amend the Proposal, or if you do not have the ability to do so, that you either:

- Decline to exercise your power under section 71; or
- Decline to exercise your power in relation to the parts of the Proposal that would apply to the Risk Management Area.

Proactively released by the Associate Minister for Greater Christchurch Regeneration