



## SUBMISSION

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To: Christchurch City Council

Submission: Plan Change 20 – Industrial Plan Change

Date: 31 March 2025

Sent to: [letstalk@ccc.govt.nz](mailto:letstalk@ccc.govt.nz)

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## **Ia Ara Aotearoa Transporting New Zealand submission to Christchurch City Council on Plan Change 20 – Industrial Plan Change**

### **Introduction**

- 1 Ia Ara Aotearoa Transporting New Zealand (Transporting New Zealand) welcomes the opportunity to make a submission on Plan Change 20 – Industrial Plan Change (the Change Proposal).
- 2 As a national road freight association, Transporting New Zealand has members and associates based in Christchurch including road freight transport businesses, scrap metal recyclers, and container park operators.
- 3 The Change Proposal was raised with us by members concerned that the changes will severely impact the economic viability of their operations and disrupt the local supply chain.
- 4 Transporting New Zealand acknowledges the importance of planning rules that carefully balance environmental, economic, social and cultural impacts.
- 5 Transporting New Zealand supports our members to operate in a responsible and compliant manner, including providing education and training opportunities, access to our national team of member advisors, and member advisories.
- 6 Transporting New Zealand has been in communication with the NZ Association of Metal Recyclers and understand we have common concerns with the Change Proposal.

### **Our concerns with the change proposal**

- 7 Transporting New Zealand is opposed to the Change Proposal (Option 2), and would instead support, in descending order of preference:
  - 7.1. Option 4 (A different plan change that puts controls on residential zones).
  - 7.2. Option 1 (No change – rely on the current policies).
  - 7.3. Option 3 (Correct errors, improve the clarity of rules and make minor changes to existing rules at the interface, including a new outdoor storage height and greater landscaping).
- 8 Transporting New Zealand is concerned that the Change Proposal puts the responsibility of mitigating noise on existing local industrial businesses rather than requiring the developers of new residential developments to include adequate acoustic mitigation.
- 9 It appears from the information provided by Christchurch City Council that insufficient acoustic mitigation and screening from property developers (particularly for three-story residential buildings) is causing an increase in noise complaints.
- 10 Firstly, we would encourage the Christchurch City Council to consider whether the noise complaints could be effectively addressed through more effective enforcement of non-compliance, rather than through rule changes.

- 11 We note that in Memo 21/1305274 “Managing industrial activities in the District Plan” dated 22 September 2021 from Team Leader – City Planning to Mayor and Councillors, para 3.8 noted:  
  
*“The nuisance issues of noise and dust identified from monitoring are not the result of ineffective District Plan provisions. They were attributed to non-compliance with existing rules on noise or are managed by ECAN under the regional plan.”*
- 12 Secondly, we submit that even in the event District Plan rules do require amendment, restricting existing industrial activities in order to mitigate poor residential property design is putting the cost and compliance burden on the wrong party.
- 13 Transporting New Zealand queries why the Change Proposal is the preferred option being considered, when previous Christchurch City Council advice (Memo 21/1305274) considering requiring resource consent for metal recycling and dump yards in any industrial zone or requiring additional standard for these activities recommended that *“neither option would be the most appropriate way to achieve those objectives and has costs that may outweigh any benefits”*.
- 14 A Memorandum AC22386 “CCC Proposed Plan Change 14 – Industrial-Residential interface Review of proposed noise insulation rules” dated 20 February 2024 from Acoustic Engineering Services to Christchurch City Council noted that *“A solution to the issue of potentially louder noise levels at the third storey (and above) or new buildings is to require the new building to have noise insulation to achieve appropriate internal noise levels.”*
- 15 Transporting New Zealand submits that with increasing three-story (plus) residential development in Christchurch, the Christchurch City Council’s approach cannot be to force industrial activity into smaller and smaller permitted areas, with increasingly restricting operating rules, if it wants to sustain regional economic growth above the national average.
- 16 More effective enforcement and better noise mitigation in residential developments can achieve improved outcomes at lower cost.

### ***Particular concerns raised by members***

- 17 Members have raised particular concern at the proposal to limit heavy “vehicle trips” per day to 60, that we understand would permit 30 round trips over 16 hours (two per hour). This could be crippling for businesses who operate their own heavy vehicles, or rely on deliveries and pick-ups.  
  
*“For industrial sites next to, or over the road from, residential zones, a maximum of 60 heavy vehicle trips per day and no operation of heavy vehicles or machinery outdoors between 10pm and 7am, otherwise it requires consent as a restricted discretionary activity with new assessment matters (new rule).”* (rule 16.4.2.10, 16.5.2.9 and 16.6.2.9).
- 18 The Change Proposal’s setbacks and height limits would pose particular operational challenges for container yard operators, that would have flow-on effects on Lyttleton Port, cargo owners and other freight customers.
- 19 Concern at the time and cost associated with applying for resource consents required by the Change Proposal, particularly given tough economic conditions and sluggish forecast economic growth.

## **About Ia Ara Aotearoa Transporting New Zealand**

Ia Ara Aotearoa Transporting New Zealand is a national membership association representing the road freight transport industry. Our members operate urban, rural and inter-regional commercial freight transport services throughout the country.

As the peak body and authoritative voice of the road freight sector, Transporting New Zealand's purpose is creating the environment where trucking operators can drive successful, safe, sustainable businesses. Our strategic priorities are:

- Providing one industry voice for advocacy
- Promoting the road freight transport industry
- Attracting talent and promoting workforce development
- Supporting our members and customers
- Sustainability, safety and responsible emissions reduction

New Zealand's road freight transport industry employs 33,000 people (1.2% of the total workforce), and has a gross annual turnover in the order of \$6 billion. This is part of a wider transport sector that employs 108,000 people and contributes 4.8 percent of New Zealand's GDP. Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand (MoT National Freight Demands Study 2018).

**END**