

## Chapter 5 Land Use and Infrastructure

### **Objective 5.2.1 – Location, design and function of development (Entire Region)**

*Development is located and designed so that it functions in a way that:*

- 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:*
  - 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.*

### **Objective 5.2.2 – Integration of land-use and regionally significant infrastructure (Wider Region)**

*In relation to the integration of land use and regionally significant infrastructure:*

- 1) *To recognise the benefits of enabling people and communities to provide for their social, economic and cultural well-being and health and safety and to provide for infrastructure that is regionally significant to the extent that it promotes sustainable management in accordance with the RMA.*
- 2) *To achieve patterns and sequencing of land-use with regionally significant infrastructure in the wider region so that:*
  - a) *development does not result in adverse effects on the operation, use and development of regionally significant infrastructure.*
  - b) *adverse effects resulting from the development or operation of regionally significant infrastructure are avoided, remedied or mitigated as fully as practicable.*
  - c) *there is increased sustainability, efficiency and liveability*

### **Policy 5.3.2 – Development conditions (Wider Region)**

*To enable development including regionally significant infrastructure which:*

- 1) *ensure that adverse effects are avoided, remedied or mitigated, including where these would compromise or foreclose:*
  - a) *existing or consented regionally significant infrastructure;*
  - b) *options for accommodating the consolidated growth and development of existing urban areas;*
  - c) *the productivity of the region's soil resources, without regard to the need to make appropriate use of soil which is valued for existing or foreseeable future primary production, or through further fragmentation of rural land;*
  - d) *the protection of sources of water for community supplies;*
  - e) *significant natural and physical resources;*
- 2) *avoid or mitigate:*
  - a) *natural and other hazards, or land uses that would likely result in increases in the frequency and / or severity of hazards;*
  - b) *reverse sensitivity effects and conflicts between incompatible activities, including identified mineral extraction areas; and*
- 3) *integrate with:*
  - a) *the efficient and effective provision, maintenance or upgrade of infrastructure; and*
  - b) *transport networks, connections and modes so as to provide for the sustainable and efficient movement of people, goods and services, and a logical, permeable and safe transport system.*

### **Comment**

**Objective 5.2.1** is concerned with the location, design and function of development across the entire region. The objective is in two parts. The first part (a) is concerned with growth in and around existing urban areas and is not relevant to this request for plan change. The second part (b) is concerned that

people and communities are enabled to provide for their wellbeing, health and safety. This objective is qualified by a series of sub-clauses (a) to (i). For this plan change the relevant sub-clauses require that development functions in a way that:

- (2)(c) encourages sustainable economic development by enabling business activities in appropriate locations;
- (2)(e) enables rural activities that support the rural environment including primary production;
- (2)(f) is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure; and
- (2)(g) avoids adverse effects on ...regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects.
- (2)(i) avoids conflicts between incompatible activities.

The proposed plan change presents a strong alignment with this objective. A dairy plant already exists in this location and provides an appropriate node for future growth of dairy processing activities. The proposed DPMA is part of a continuum of rural production and is appropriately located in the Outer Plains, accessible to the farms it services.

The DPMA is a generator of potentially significant traffic, including heavy vehicles. The effects of the existing and future potential traffic on regionally important infrastructure has been assessed and provisions have been incorporated into the plan change to ensure that effects on the efficiency and safety of both State Highway 1 and the Main Trunk Railway line are addressed on an on-going basis as part of any building consent processes which increase milk processing or storage capacity.

Similarly, the provisions of the plan change include rules which, whilst enabling of dairy processing activities, set limits in respect of environmental effects on adjoining activities and property eg noise limits (that are more stringent than the operative District Plan), landscape treatment, lighting etc. As such, the provisions avoid and/or mitigate conflicts between activities in the DPMA and those on adjoining property.

In summary, the Plan Change enables appropriate business activity in the rural environment, whilst establishing standards and limits to development. As noted in the Principal Reasons and Explanation to Objective 5.2.1, primary production is of significance to the economic and social wellbeing of the community. The proposed DPMA reflects the significance of the dairy industry in this context.

**Objective 5.2.2** is concerned with integration of land use and significant infrastructure. The provisions of the request for plan change include specific rules in respect of the state highway intersection to Old South Road and the need to have a mechanism for on-going review of its efficiency and safety as development proceeds within the DPMA. Similarly, the ODP provides opportunity to take advantage of the proximity of the Main Trunk Railway Line as an alternative for transporting freight. These provisions demonstrate that the DPMA is cognisant of its potential effect on the operation and use of the State Highway and the railway line as well as the opportunities this infrastructure provides.

**Policy 5.3.2** is specifically concerned with development conditions and the enablement of development in the wider region. In providing for this enablement the policy requires a list of particular adverse effects, (a) to (e), to be addressed.

Of relevance to this plan change is ensuring that effects do not compromise or foreclose on:

- (a) existing... regionally significant infrastructure
- (c) productivity of the region's soil resources

Avoiding or mitigating reverse sensitivity effects and conflicts with transport networks (Policy 5.3.2(2)(b)) along with integrating with transport networks and modes so as to provide for the sustainable and efficient movement of goods(Policy 5.3.2(3)(b)) are also achieved through the

proposed provisions.

Whilst further hardstand and built development will result in a loss of available soil, the area of soil lost is very small relative to the expansive area of the wider plains. Nor are the soils within the DPMA considered highly versatile.

The maintenance of soils for productive uses must also be considered in the context that the DPMA is processing and adding value to rural produce, and is best located in a rural environment to be close to the product source and to optimise efficiency in transport and production.

**Policy 5.3.3 – Management of development (Wider Region)**

*To ensure that substantial developments are designed and built to be of a high-quality, and are robust and resilient:*

- 1) *through promoting, where appropriate, a diversity of residential, employment and recreational choices, for individuals and communities associated with the substantial development; and*
- 2) *where amenity values, the quality of the environment, and the character of an area are maintained, or appropriately enhanced.*

**Comment**

This proposal will provide certainty in respect of dairy processing activities, which in turn offers employment opportunities as detailed in the Economic Impact Memorandum in **Appendix 8**.

**Policy 5.3.5 – Servicing development for potable water, and sewage and stormwater disposal (Wider Region)**

*Within the wider region, ensure development is appropriately and efficiently served for the collection, treatment, disposal or re-use of sewage and stormwater, and the provision of potable water, by:*

- 1) *avoiding development which will not be served in a timely manner to avoid or mitigate adverse effects on the environment and human health; and*
- 2) *requiring these services to be designed, built, managed or upgraded to maximise their ongoing effectiveness.*

**Comment**

The DPMA will be self-sufficient in terms of servicing i.e., it is not required to be part of a reticulated, urban system.

The existing plant has its own consents for water take.

With respect to stormwater the report by Pattle Delamore and Partners (PDP) in **Appendix 9** has assessed the capacity of the site to manage future stormwater. The report assesses the maximum area of hard stand within the DPMA (based on the development assumptions described in Section 6) and having regard to subsurface conditions, the available land area and assuming best practice management techniques. The report confirms that stormwater can be effectively managed within the DPMA boundaries.

The treatment and disposal of wastewater from the processing activities will depend on the nature of the different activities that may be established over time e.g., infant formula compared with a cheese making factory. The particulars of the treatment method required will be addressed through specific resource consent applications to the Regional Council on an “as needed basis”.

**Policy 5.3.12 – Rural production (Wider Region)**

*Maintain and enhance natural and physical resources contributing to Canterbury’s overall rural productive economy in areas which are valued for existing or foreseeable future primary production, by...*

- 2) *enabling tourism, employment and recreational development in rural areas, provided that it:*
  - a) *is consistent and compatible with rural character, activities, and an open rural environment;*
  - b) *has a direct relationship with or is dependent upon rural activities, rural resources or raw material inputs*

- sourced from within the rural area;*
- c) *is not likely to result in proliferation of employment (including that associated with industrial activities) that is not linked to activities or raw material inputs sourced from within the rural area; and*
- d) *is of a scale that would not compromise the primary focus for accommodating growth in consolidated, well designed and more sustainable development patterns, and;*

## **Comment**

The request for plan change has a direct relationship to rural production and will enable employment as described in the Economics Impact Memorandum in **Appendix 8**.

## **Chapter 7 – Fresh Water**

### **Objective 7.2.1 – Sustainable management of fresh water.**

*The region's fresh water resources are sustainably managed to enable people and communities to provide for their economic and social well-being through abstracting and/or using water for irrigation, hydro-electricity generation and other economic activities, and for recreational and amenity values, and any economic and social activities associated with those values, providing:*

- (1) *the life-supporting capacity ecosystem processes, and indigenous species and their associated freshwater ecosystems and mauri of the fresh water is safe-guarded...*

### **Objective 7.2.4 – Integrated management of fresh water resources**

*Fresh water is sustainably managed in an integrated way within and across catchments, between activities, and between agencies and people with interest in water management in the community, considering:*

- (1) *the Ngai Tahu ethic of Ki Uta Ki Tai (from the mountains to the sea);*
- (2) *the interconnectivity of surface water and groundwater;*
- (3) *the effects of land uses and intensification of land uses on demand for water and water quality; and*
- (4) *kaitiakitanga and the ethic of stewardship; and*
- (5) *any net benefits of using water, and water infrastructure, and the significance of those benefits to the Canterbury region.*

### **Policy 7.3.6 – Freshwater quality**

*In relation to water quality:*

- (1) *to establish and implement minimum water quality standards for surface water and groundwater resources in the region..... and to manage activities which may affect water quality (including land uses), singularly or cumulatively, to maintain water quality at or above the minimum standard set for that water body.*

## **Comment**

The proposed DPMA provides for dairy processing activities, but as a form of “zoning” is not prescriptive as to the exact activity that is proposed. Whilst infant and nutritional formulas are currently produced at the established plant, over time, it is possible that a wider range of dairy products may be processed.

The established activities have existing consents for water take. The future needs for fresh water are not known however, any additional water required beyond the volumes already consented, would require either a variation or new consent to be obtained. This would be considered in the appropriate manner at that point in time, in the context of the relevant statutory plans and their objectives and policies.

In respect of water quality, the report prepared by PDP on the feasibility of stormwater disposal, has considered if stormwater run-off from future development could still be managed on-site in a manner that accords with best practice and ensures the quality of the groundwater resource is maintained. Reference to **Appendix 9** confirms that the area of the DPMA is sufficiently large that effects of further hardstand and built development can be effectively treated before discharge to ground.

## **Chapter 11 - Natural Hazards**

### ***Objective 11.2.1 – Avoid new subdivision, use and development of land that increases risks associated with natural hazards***

*New subdivision, use and development of land which increases the risk of natural hazards to people, property and infrastructure is avoided or, where avoidance is not possible, mitigation measures minimise such risks.*

#### **Comment**

The DPMA will not increase the risk of natural hazards to people and infrastructure. The land is not subject to any known flood, instability or fault-line risk.

## **Chapter 14 – Air Quality**

### ***Objective 14.2.2 – localised adverse effects of discharges on air quality***

Enable the discharges of contaminants into air provided there are no significant localised adverse effects on social, cultural and amenity values, flora and fauna, and other natural and physical resources.

#### **Comment**

Synlait already has consents for discharge of contaminants to air from its established plant. As development occurs within the DPMA over time, variations or additional consents may be required, depending on the nature of the activities and processes proposed. Although the established plant requires particular consents, this does not mean that the same or similar consents will be required in the future for other types of dairy processing activities.

Acknowledging that consents for air discharges will require significant detail at the time of application, and that the development in technologies and processes will change and improve over time, it is appropriate that future activities in the DPMA are consented in respect of air discharge at the appropriate time.

## **Chapter 16 - Energy**

### ***Objective 16.2.1 – Efficient use of energy***

*Development is located and designed to enable the efficient use of energy, including:*

- ....  
2) *planning for efficient transport, including freight*

#### **Comment**

The proposed management area is located adjacent to State Highway 1 and the Main Trunk Rail Line, and this proximity will assist in efficient use of energy in transport of freight. The location of the DPMA within the Outer Plains, close to farms, also assists in reduction of transportation of milk to the plant.

## **Chapter 18 – Hazardous Substances**

### ***Objective 18.2.1 – Avoid, remedy or mitigate adverse effects***

Adverse effects on the environment from the storage, use, disposal and transportation of hazardous substances are avoided, remedied or mitigated.

#### **Comment**

The provisions of the DPMA require the nature and volume of hazardous substances stored and used to be fully recorded within a Management Plan and the mechanisms for appropriate management to be prescribed. This includes methods of containment, emergency response to accidental spills and achievement of statutory requirements.