

Form 5
Submission on Publicly Notified Proposal for Plan Change
Clause 6 of Schedule 1, Resource Management Act 1991

To: Selwyn District Council

Name of submitter:

Hughes Developments on behalf of IZONE Industrial Park

This is a submission on the following change proposed to the Selwyn District Plan:

Private Plan Change – Dairy Processing Management Area – Synlait Milk Limited

The specific provisions of the proposal that my submission relates to are:

The whole of the Private Plan Change request.

Our submission is:

We oppose the Proposed Plan Change for the following reasons:

1. The Plan Change infers that the Dairy Processing Management Area is necessary to support the growth and expansion of the existing activity on the site, however no justification is provided as to growth expectations and land requirements in support of the large land area (113.5ha) included within the Plan Change.
2. Issues, Objectives, Policies and Rules provide for a wider scope of activity than that which relates explicitly to the existing dairy processing activity. Provision for 'related' and 'ancillary' activities as permitted activities within the Height Control Area and Discretionary Activities within the Rural Buffer Area will create a zone more consistent with a Business Zone than a Rural Zone. The provision for all 'other' activities except dairy processing within the statutory framework of the plan change is strenuously opposed.
3. By allowing related and ancillary activities to establish as a permitted activity, the threshold for non-related activities to establish on the site is lowered through the application of the permitted baseline test.
4. The reason for the Plan Change is stated as being the consolidation of existing activities, yet the Plan Change has been drafted to allow for the creation of new activities within the proposed dairy processing management area.
5. The Proposed Plan Change should be withdrawn and the issues, objectives, policies and rules amended so that the Dairy Processing Management Area relates exclusively to the growth and expansion of the existing dairy processing operation.
6. The Land Use Recovery Plan (LURP) identifies greenfield business priority areas. This plan change in its current form provides for a level of activity that is more akin to a

business zone. The Plan Change document refers to the industrial character of the processing activity and this will only be exacerbated by the extent of related and ancillary activities that are provided for. Although located outside the Greater Christchurch boundary the broad business zone characteristics exhibited by the plan change are contrary to the LURP in that it will directly impact on greenfield business priority areas identified within the LURP in respect of the Selwyn District and beyond.

7. The plan change fails to achieve the purpose and principles of the Resource Management Act and is therefore contrary to Part 2 of the Act. Whilst the dairy processing activity is consistent with sustainable development given its location and proximity to primary production areas, the remit for other activities to co-locate within the plan change area is not consistent with sustainable management and is contrary to Part 2 of the Act.
8. The economic impact assessment undertaken by Harris Consulting does not address any potential negative impacts the proposed plan change will have on areas already zoned for the levels of related and ancillary activity being promoted by the plan change.
9. The Section 32 evaluation and in particular the assessment of alternative locations is flawed due to the erroneous conclusions reached in relation to other industrial land available within the District. For instance, the Height Control Area within the plan change and where the majority of activity is supposedly located has an area of 44.1ha. Stage 7 of Izone has 42ha of zoned available. The greenfield business priority areas identified within the LURP provide an additional 32ha adjacent to Izone Stage 7 and a further 50ha on the opposite side of Hoskyns Road.
10. Furthermore the assessment of alternative locations fails to acknowledge the existing presence of dairy processing within Izone and therefore does not address the synergies and efficiencies that could be attained by locating ancillary and related activities within already zoned land.
11. It is also noted that one of the underlying principles supporting the location of the proposed plan change site is the access to rail, state highway networks and the proximity to Port of Lyttleton. All of these attributes can equally be applied to existing business zones within the Selwyn District.
12. The plan change document states that the District Plan Review process is not appropriate to achieve the outcomes sought by the plan change, especially due to the time associated with the review process. It should be noted that the plan change documentation also identifies a series of unimplemented consents which appear to allow for future growth, expansion and diversification which would mitigate any perceived time inefficiencies aligned within the review process.

We seek the following decision from the local authority:

- (a) To withdraw the Plan Change in its entirety
- (c) If (a) is not granted then the following changes are requested:
 - (i) To amend the plan change so that it explicitly relates and provides for the upgrade,

expansion and diversification of the existing dairy processing activity only.

- (ii) A draft a stronger set of objectives, policies and rules to restrict 'other' activities from establishing within the plan change area.

We wish to be heard in support of this submission.



on behalf of Hughes Developments

Signature of submitter (or person authorised to sign on behalf of submitter) Date

Address for service of submitter:

Hughes Developments

c/- Davie Lovell Smith P O Box 679

Christchurch

Contact person: Mark Brown

Email: mark.brown@dls.co.nz
