

SUMMARY STATEMENT

1. My full name is **Brittany Olivia Ratka**. I am a Policy Planner in the City Planning Team of the Christchurch City Council (the **Council**).
2. Today I will address the Industrial Interface Qualifying Matter (**QM**). The Council documents relevant to this topic are:
 - (a) The Part 2 Qualifying Matters s32 report, especially section 6.22;
 - (b) Appendices 39 and 40 to the Part 2 Qualifying Matters s32 report, being Dr Trevathan's acoustic report and modelling assessment;
 - (c) My s42A report, especially section 7;
 - (d) The evidence of Dr Trevathan (on noise), Mr Osborne (on economic effects), and Mr Scallan (on enabled and feasible capacity); and
 - (e) Paragraphs 14 – 38 of my rebuttal evidence.
3. The Industrial Interface is a new QM and has been considered under s771(i)¹. It includes a new objective, policy, and building height rule in the residential chapter, as well as a spatial overlay in the planning maps.
4. It proposes to restrict residential building height at two storeys or 8m, whichever is the lesser, where properties zoned Medium and High Density Residential are within 40m of industrial zoned properties. Where this is not achieved, resource consent would be required as a fully discretionary activity.
5. The District Plan (**the Plan**) currently includes rules in the Industrial and District-Wide Chapters that help manage the interface where existing residential zones adjoin industrial zones. The enablement for greater residential heights at this interface would create a new receiving environment for industrial noise. While the industrial zone noise limits are more enabling than other zones, where noise is received within residential zones the residential noise limits apply. Noise is not measured at the boundary of residential zones, rather it is measured at 1.2 – 1.5 metres above ground level over the entire outdoor area of the site, as well as 1.2 – 1.5 metres above the 'floor level of interest' at upper-level façades. Increasing building height would result in new 'floor levels of interest' where compliance with the noise limits is measured.

¹ S771(i) relates to the requirement in the NPS-UD to provide sufficient business land suitable for low density uses to meet expected demand.

6. The modelling undertaken by Dr Trevathan² demonstrates that there are realistic scenarios where industrial activities currently achieving the residential noise limits over residential properties would no longer comply due to increased building heights at the interface. As dwelling height increases there is less screening from industrial noise sources provided by intervening structures such as existing buildings and fences. The increased noise exposure could result in adverse amenity effects on future occupants and reverse sensitivity effects on industrial activities, potentially constraining their operation. The proposed 40m buffer reflects that the interface has a varying extent of screening (from no screening, to screening of the ground and first floor of dwellings) and it captures most scenarios.
7. Three submissions were made in support of the Industrial Interface QM without changes, four were in opposition, and a number sought specific changes. In my s42A Report, I agree with a minor change to the proposed policy, and provide a section 32AA analysis to support this change.³ In my s42A Report I explain that to avoid potential *Waikanae* scope issues I recommend that the proposed height limit of 7m/two-storeys be increased to 8m/two storeys for the medium and high density residential zones and that the QM be removed in the Residential Suburban and Residential Suburban Density Transition zones, to ensure that PC14 does not result in provisions that are more onerous than the operative Plan.⁴ My s42A report also sets out why I do not support other changes.
8. An associated correction I would like to make is to the table in proposed Chapter 6.1A of the Plan. The notified mapping shows the QM over the Residential Suburban and Residential Suburban Density Transition Zone and, as noted above, my s42A report recommends removing the QM from these zones. However, they are still referenced in this table and I recommend those references be removed. Whilst not explicit in my s42A report I also recommend removing this QM from the Future Urban Zone given this zone predominantly has an 8m height limit; again, a 7m/two storey height limit would result in PC14 being more onerous than the operative Plan.

Date: 1 November 2023

Brittany Ratka

² Refer to Appendix 40 of the Part 2 Qualifying Matters s32 report.

³ Refer to page 54 of my section 42A Report.

⁴ Refer to pages 54 - 56 of my section 42A Report.