

Commercial Film or Video Production Facilities

Proposal to exercise the power under section 71 of the Greater Christchurch
Regeneration Act 2016 to provide for the development and operation of
commercial film or video production facilities

18 June 2020



REGENERATE
CHRISTCHURCH
TE KŌWATAWATA



1. BACKGROUND

- 1.1 This Proposal is provided to the Associate Minister for Greater Christchurch Regeneration (the **Minister**) in accordance with section 66(2)(b) of the Greater Christchurch Regeneration Act 2016 (the **GCR Act**). It proposes the exercise of power by the Minister under section 71 of the GCR Act to amend the Christchurch District Plan (the **District Plan**) and the Canterbury Regional Policy Statement (the **Regional Policy Statement**) to provide for the development and operation of commercial film or video production facilities¹ in specified zones within the Christchurch district.
- 1.2 The Proposal has been prepared in response to a request from Christchurch City Council (the **Council**).² As the recipient of several requests for information regarding the planning framework within which film studios would fall to be considered (including with respect to the proposal to redevelop the former Templeton Hospital site³), the Council identified that the film industry was an area of potential economic growth but noted that permanent commercial film or video production facilities were not specifically contemplated within the District Plan.
- 1.3 The Council therefore requested Regenerate Christchurch to consider whether the tools in the GCR Act could lawfully be deployed to more specifically provide for commercial film or video production facilities. This Proposal is in response to that request.

¹ Also referenced in this Proposal as “film studios”.

² Letter to Regenerate Christchurch from Christchurch City Council dated 1 May 2020.

³ <https://www.stuff.co.nz/entertainment/121752860/film-studio-proposed-for-christchurch-could-inject-millions-into-the-city-economy>.

2. THE PROPOSAL

- 2.1 Recognising the growing international and national interest in establishing commercial film or video production studios in New Zealand, together with the potential for such activities to support regeneration, the aim of this Proposal is to encourage the establishment of such facilities by introducing a clear, certain and enabling resource consent process into the District Plan (**section 65(2)(a) GCR Act**).
- 2.2 The consent process proposed and the amendments to the District Plan and the Regional Policy Statement are set out in Section 4 of the Proposal.
- 2.3 If the amendments identified in this Proposal are implemented, they would form part of the District Plan and the Regional Policy Statement until both documents are reviewed under the Resource Management Act 1991 (the **RMA**) (**section 65(2)(b) GCR Act**).
- 2.4 In accordance with **section 65(2)(c) GCR Act** and as outlined more fully in Section 6 of this document, the Proposal:
- (a) enables rebuilding via the conversion of land and/or infrastructure and/or buildings for the purposes of permanent commercial film studio or video production facilities;
 - (b) enables the renewal of existing urban areas via the development of commercial film studio or video production facilities, and in doing so enables an improvement in the economic, social and cultural wellbeing and resilience of the Christchurch community whilst ensuring that environmental well-being is maintained;
 - (c) enables a focussed and expedited regeneration process by enabling the development of commercial film studio or video production facilities in the district;
 - (d) facilitates the ongoing planning and regeneration of greater Christchurch;
 - (e) enables community input into the decision making process in accordance with the statutory process for inviting such comment under section 68 GCR Act; and
 - (f) recognises the local leadership of the Canterbury Regional Council, Christchurch City Council, Regenerate Christchurch, Selwyn District Council, Te Rūnanga o Ngāi Tahu and Waimakariri District Council through their input into the development of the Proposal, and in particular recognises the leadership of the Christchurch City Council by ensuring it retains its consenting function in respect of any specific application for a film studio consent.
- 2.5 In accordance with **section 65(2)(d) of the GCR Act** and as outlined more fully in Section 6 of this document, Regenerate Christchurch as the Proponent of the Proposal has considered the alternatives to the exercise of power under section 71 of the GCR Act and considers it necessary and preferable that the power under section 71 is utilised in the manner sought.
- 2.6 Despite the progress made since the Canterbury earthquakes, the economic position of the Christchurch district has continued to decline necessitating continued focus on identifying and converting regeneration opportunities. The film industry has been identified as an immediate regeneration opportunity which the Christchurch district is not yet appropriately positioned to respond to. The Proposal provides the most effective and expedient pathway to enable the opportunity within the District Plan and the Regional Policy Statement.
- 2.7 In accordance with **sections 65(2)(e) and (f) of the GCR Act** the relevant notices are contained in Appendices 2 and 3 of this Proposal.

3. THE REGENERATION OPPORTUNITY

- 3.1** Currently, New Zealand's only dedicated film studios are located in Auckland and Wellington. Despite extensive use of South Island locations for filming, there are no purpose-built and fully equipped commercial films or video production facilities outside of the North Island.
- 3.2** As the screen industry has continued to grow in New Zealand, there has been mounting interest in establishing state of the art, purpose built studio and production facilities in other parts of the country to encourage growth in the industry, both by attracting new and existing screen entertainment industries from overseas and by encouraging local industries to grow and expand. Of particular relevance to this Proposal is the desire to see pre- and post-production facilities locate in the South Island to capitalise on the growing reputation of the South Island as a filming location.
- 3.3** Commercial film or video production facilities are characterised by large sites of between 5,000m² and 300,000m², comprising a mix of large footprint industrial-style buildings used for acoustically insulated studios and sound-stages, with smaller buildings used for offices, costume and make-up, workshops, storage and staff areas. Large, (usually) paved outdoor areas known as 'backlots' are also used for filming, storage and car-parking. Activities carried out on site include production (filming) and post-production (reviewing, assembling, editing film and sound), set design and construction, and related office activities.
- 3.4** A report commissioned by ChristchurchNZ in 2019⁴ indicates that while, historically, Canterbury has successfully attracted on-site filming of major international films, it lacks the infrastructure to benefit from the pre- and post-production activity outlined above.
- 3.5** Additional analysis from Development Christchurch Limited, commissioned by Regenerate Christchurch, has confirmed the original analysis undertaken by ChristchurchNZ and identified a range of regeneration benefits that the development and operation of commercial film or video production facilities could bring to the district and greater Christchurch.⁵ These include:
- (a) the generation of between \$50m - \$200m in revenue per year depending on the type and quantity of film production activity secured;
 - (b) the provision of employment opportunities for approximately 270 people in a 'base-case' scenario, moving to a considerably higher number if a large scale production (such as a feature film or a high value television series) were to be secured;
 - (c) the potential for further benefits to accrue from film distribution and exporting activities (in addition to the revenue quantified in (a) above); and
 - (d) down-stream economic benefits accruing from related activities such as film based tourism (again in addition to the revenue quantified in (a) above).
- 3.6** In recent months, the Council has received enquiries from three separate parties interested in developing permanent commercial film or video production facilities in the Christchurch district. In each instance, the Council has considered the planning environment in which such an application would be assessed and determined that the lack of any explicit provision for such facilities creates a barrier to realisation of this opportunity.

⁴ ChristchurchNZ (2019) *The Economic Impact of the Screen Entertainment Industry in Canterbury*, July 2019.

⁵ Development Christchurch Limited, Balderstone, M (2020) *Economic Benefit of Production Studios for the Greater Christchurch Region*, June 2020.

- 3.7** An analysis of the existing planning framework (commissioned independently by Regenerate Christchurch, and undertaken by Boffa Miskell⁶), confirms that the District Plan does not specifically contemplate, and therefore does not appropriately provide for, the development and operation of permanent commercial film or video production activities in any part of the Christchurch district. Rather, such activities fall to be assessed by default rather than design as “not provided for” activities.
- 3.8** As set out more fully in Section 5, depending on the zone in question, permanent commercial film or video production facilities are assessed as either fully discretionary or non-complying activities under the current District Plan provisions. Although the non-complying status results in an additional test to be overcome (section 104D RMA), in both instances, because the activity is not specifically contemplated within the District Plan, there is no guidance available as to how such activities are to be evaluated.
- 3.9** The planning assessment undertaken by Boffa Miskell outlines in more detail the implications of an uncertain planning environment for the Council, potential applicants, and the wider community but put simply, in an uncertain planning environment, applicants are discouraged from making an application for consent because the parameters for approval are unclear. The lack of clarity results in a wider analysis being required (because there is no certainty around the matters the decision maker should take into account) with consequential cost implications which can become prohibitive. It is this lack of certainty and clarity of decision-making that was identified by the Council as a potential barrier to realisation of the projected regeneration outcomes of such facilities.
- 3.10** To provide more certainty and clarity as to the planning process (and thus enhance the attractiveness of establishing new commercial film or video production facilities in the District) the planning assessment recommends that changes are made to both the District Plan and the Regional Policy Statement. This Proposal includes those recommended changes.
- 3.11** The amendments proposed, in conjunction with the existing District Plan provisions, are however still expected to trigger a requirement for resource consent for any specific commercial film studio or video production facility. The amendments proposed to the District Plan do not remove environmental protections but provide a pathway for commercial film or video production facilities to be assessed and, if appropriate, consented within a clear and certain framework.
- 3.12** Making the amendments sought will not, in and of itself, deliver the projected regeneration benefits. These will only be realised if an application is made, consent granted and a facility established. However, as set out above, making the amendments proposed will establish a more enabling regulatory environment, which, in turn, is more likely to encourage the establishment of such facilities.
- 3.13** In assessing the use of the power in the GCR Act to effect such changes, consideration has been given to the alternative processes available to achieve the same or similar outcomes. As set out in Section 6 of this Proposal, while the changes could be effected through standard processes available under the RMA, such processes would be unlikely to enable the full realisation of this opportunity and its regeneration benefits, particularly within the expedited timeframe necessary to take advantage of the opportunity and, if realised, contribute to much needed job creation and economic recovery.

⁶ Boffa Miskell Limited (2020) *Film Studio Proposal – Planning Assessment*. Report prepared for Regenerate Christchurch, 17 June 2020, 3.3.

4. THE AMENDMENTS

4.1 The proposed amendments to the District Plan and Regional Policy Statement are set out in full at **Appendix 1**.

4.2 Broadly, the changes to the District Plan propose to:

- (a) Amend the existing definition of “commercial film or video production” to clarify that it does not incorporate any residential component.
- (b) Insert specific recognition for “commercial film or video production” activities within strategic objective 3.3.7.
- (c) Insert specific policies supporting the development of commercial film or video production activities within the commercial, rural and industrial zones.
- (d) Make “commercial film or video production” activities permitted in the following zones:
 - (i) Commercial Mixed Use.
 - (ii) Commercial Central City Mixed Use.
 - (iii) Industrial General.
 - (iv) Industrial Heavy.
 - (v) Industrial Park.
 - (vi) Rural Urban Fringe.
 - (vii) Rural Templeton.
- (e) Include additional permitted activity standards in zones where these are required to ensure appropriate environmental outcomes.

4.3 As set out more fully in Section 5 of this Proposal, the planning analysis undertaken by Boffa Miskell confirms that a number of the activities currently permitted in these zones share similar characteristics to commercial film or video production facilities. As such, the existing standards within those zones will also appropriately control the development and operation of such facilities. In zones where additional standards are required to provide the same level of environmental protection, such standards are identified for inclusion.

4.4 In addition to the existing standards and to any standards recommended to be included through the proposed amendments, the current district-wide rules will also continue to apply.

4.5 The changes to the Regional Policy Statement propose to:

- (a) include express provision for commercial film or video production activities to occur both within and outside of the existing urban areas and greenfield priority areas in the Christchurch district as identified in Map A;
- (b) ensure that commercial film or video production facilities are connected to reticulated water and wastewater systems (thus ensuring no unnecessary load on the district’s aquifers); and

(c) classify commercial film or video production activities as activities that are not “noise sensitive” as that term is used within the Regional Policy Statement.

4.6 The decision being sought is that the Minister exercise the powers under section 67 of the GCR Act to proceed with this Proposal and seek public comment, and then to consider whether to exercise the power under section 71 of the GCR Act to approve the proposed amendments.

4.7 If the Minister decides to proceed with this Proposal and seek public comment, a notice to that effect must be published in accordance with section 68. A draft notice meeting the statutory requirements is included as **Appendix 2**.

4.8 If the Minister decides to exercise the power under section 71 of the GCR Act, the proposed amendments are made by notice in the Gazette. A draft notice meeting the statutory requirements in this regard is included as **Appendix 3**.

5. BASIS FOR AMENDING THE DISTRICT PLAN AND THE REGIONAL POLICY STATEMENT

- 5.1 The District Plan currently provides that “commercial film or video production” may occur “as of right” in any zone except an industrial zone provided any such production does not operate in the same exterior location for more than 30 days per year.⁷
- 5.2 By contrast, *permanent* commercial film or video production facilities in all zones under the District Plan fall to be considered under the default “catch-all” rules, being the rules which apply to activities which are not specifically identified. Generally, these rules result in the activity being classified as a fully discretionary or non-complying activity, with very little (if any) guidance or support from objectives and policies of the District Plan.
- 5.3 Such activities, and the opportunity they present to promote the sustainable management of natural and physical resources, can therefore be seen to be already recognised and provided for in the District Plan but only in a limited and temporary manner. The intention of this Proposal is to extend the existing planning provisions to enable consideration of permanent facilities in much the same way.
- 5.4 The provisions of the District Plan do not suggest that the absence of explicit recognition for these activities on a more permanent basis is the result of any identified incompatibility with the District Plan’s outcomes or because these activities could be expected to generate unknown and potentially significant adverse effects. Rather, as discussed further below, the development and operation of commercial film or video production facilities and their potential environmental effects are generally compatible with the purpose and functions of a number of zones, the environmental outcomes they seek to achieve, and the characteristics of the activities they currently provide for. The current non-complying or fully discretionary status of permanent commercial film or video production facilities is therefore a result of such activities not being explicitly provided for rather than any identified inconsistency with the planning regime.
- 5.5 Nevertheless, and irrespective of the genesis, under the existing classifications, obtaining resource consent for such activities could be expected to be complex, lengthy, expensive and without any certainty of outcome, significantly reducing the prospect of such facilities establishing and thereby losing the opportunity to generate the regeneration benefits identified by the relevant analysis. This is the case even where the activity status defaults to fully discretionary.
- 5.6 In zones where the activity defaults to a non-complying activity the prospect of obtaining consent is even more difficult again. In order to grant resource consent for a non-complying activity under the RMA, a consent authority must determine that the activity is either not contrary to the objectives and policies of the relevant plan, or that the adverse effects are not more than minor before consent can lawfully be granted.⁸ Even if the consent authority considers that one of those two gateways is met, it may still determine to decline resource consent on the basis that it does not promote the sustainable management of natural and physical resources.⁹ As discussed above, the current absence of any guidance within the District Plan on these activities means that the nature of this assessment and the matters it should consider are uncertain.
- 5.7 In addition to the above provisions of the District Plan, Chapter 6 of the Regional Policy Statement restricts new urban activity to existing urban areas or greenfield priority areas

⁷ Christchurch District Plan, rule 6.2.4.1.1(P6) “Commercial film or video production” and ancillary buildings or structures are permitted in any zone except an industrial zone, provided that, among other standards, any such production does not operate from the same exterior location for more than 30 days per year.

⁸ Resource Management Act 1991, section 104D.

⁹ Resource Management Act 1991, section 104.

(identified on Map A) unless expressly provided for in the Regional Policy Statement (*emphasis added*). As set out in the planning assessment, commercial film or video production activities have characteristics of both urban and rural activities, and as such, do not comfortably fit into either definition.¹⁰ Moreover, the land area typically required for such facilities is, in many instances, more compatible with rural areas which generally fall outside existing urban or greenfield priority areas in the Regional Policy Statement. Consequently, to address these potential constraints, the amendments outlined in this Proposal are intended to enable commercial film or video production as an activity “expressly provided for” in the Regional Policy Statement.

- 5.8** The primary function of this Proposal is to address the constraints outlined above and in doing so enhance the ability of the District Plan and the Regional Policy Statement to enable the development and operation of commercial film or video production facilities within the Christchurch district.
- 5.9** It is important to note that the proposed amendments would result in an applicant for a specific commercial film or video production facility proposal still being required to meet a range of standards and in most instances still having to apply for resource consent. However, the consent pathway facilitated by this Proposal and its proposed amendments would be more enabling, certain, timely and cost effective than the current District Plan provisions provide for.
- 5.10** In determining the zones in which commercial film or video production facilities are enabled, the analysis undertaken by Boffa Miskell considered:
- (a) the extent to which the zone already contemplates and provides for development that has similar environmental characteristics, and would likely generate similar effects, to commercial film or video production facilities; and
 - (b) the extent to which the establishment and operation of commercial film or video production facilities would be consistent with the objectives and policies for the zone.
- 5.11** As a result, the zones identified as appropriate for a consenting pathway for commercial film or video production facilities are those zones where such facilities are consistent with the environmental outcomes expected in the District Plan and where such facilities would not be unusual or inappropriate.
- 5.12** A full assessment of the proposed amendments and the extent to which commercial film or video production activity is otherwise consistent with the District Plan and Regional Policy Statement is set out in the planning assessment.¹¹

District Plan Objectives and Policies

- 5.13** A limited range of amendments to objectives and policies of the identified zones in the District Plan are considered necessary to provide for commercial film or video production facilities. The proposed amendments reinforce the intent of this Proposal to enhance the provision for these facilities in specified industrial, rural and commercial zones in the District Plan. To that end:
- (a) An amendment to objective 3.3.7 is proposed in order to give effect to the Regional Policy Statement which anticipates express provision for this activity outside existing areas.

¹⁰ Boffa Miskell Limited (2020) *Film Studio Proposal – Planning Assessment*. Report prepared for Regenerate Christchurch, 17 June 2020, 2.1.

¹¹ Boffa Miskell Limited (2020) *Film Studio Proposal – Planning Assessment*. Report prepared for Regenerate Christchurch, 17 June 2020, section 3.

- (b) Explicit references to commercial film or video production activities are proposed for inclusion in policies 15.2.7.1, 6.2.1.4 and policy 17.2.2.1. These references will ensure there is specific policy support for this type of activity in the identified zones.

District Plan Rules

- 5.14** As noted above, the identified commercial, industrial and rural zones each anticipate and provide for business activities that share similar characteristics to that of commercial film or video production facilities. In its planning assessment, Boffa Miskell identifies that these facilities also compare favourably with the intended outcomes anticipated by the zones, and the standards which apply to activities within them.¹²
- 5.15** For those reasons, Boffa Miskell considered it appropriate to list “commercial film or video production activities” as permitted, subject to compliance with specified standards. It also considered that a ‘restricted discretionary’ classification would be appropriate in the event of non-compliance with those standards to enable assessment of relevant potential adverse effects (other than with respect to connection to reticulated water or wastewater services where non-adherence triggers non-complying status).

District Plan Standards

- 5.16** With two exceptions in the two rural zones, the existing standards are generally considered appropriate to control the outcomes and effects of commercial film or video production facilities in the identified zones. Utilising the existing standards will assist in ensuring that commercial film or video production facilities align with the intent and character of these zones, and are compatible with other activities existing in and anticipated for these various areas.
- 5.17** In the two rural zones, additional standards and amendments to existing standards are proposed where they relate to site coverage and landscaping. These changes are designed to ensure more appropriate management of any adverse effects resulting from commercial film or video production activity. In the Rural Templeton zone, the district wide high trip generator rule is considered more appropriate for maintaining oversight of traffic effects arising from this activity than the zone specific traffic movement standard. As such, the removal of the zone specific traffic movement standard is proposed as it applies to commercial film or video production activity.¹³
- 5.18** Under the proposed amendments, existing district-wide rules (including those relating to traffic and noise) would continue to apply to future commercial film or video production activity. This is appropriate to ensure compatibility with the surrounding environment and alignment with the amenity values anticipated. The application of these standards (and the high-trip generator rule in particular) will mean any proposal for a large scale film studio is highly likely to trigger the need for resource consent (on a non-notified basis). Where necessary, additions have been made to the relevant District wide standards to ensure that they apply to commercial film or video production facilities or aspects of the same as appropriate (see for example Rule 6.1.7.2.2 relating to the requirement for acoustic treatment with respect to airport noise).

¹² Boffa Miskell Limited (2020) *Film Studio Proposal – Planning Assessment*. Report prepared for Regenerate Christchurch, 17 June 2020, 3.3

¹³ Boffa Miskell Limited (2020) *Film Studio Proposal – Planning Assessment*. Report prepared for Regenerate Christchurch, 17 June 2020, 3.4.

Regional Policy Statement

5.19 The proposed amendments to the Regional Policy Statement are required to clarify that:

- (a) commercial film or video production activity is an expressly identified form of development which may be located in the Christchurch district outside of existing urban areas and greenfield priority areas;
- (b) commercial film or video production facilities are expected to be connected to reticulated water and wastewater systems to avoid additional load on the aquifers; and
- (c) commercial film or video production activities are a compatible use of land within the noise contours as activities that are not “noise sensitive” as that definition applies.¹⁴

5.20 It is noted that a similar approach to expressly providing for an identified activity outside of existing urban areas and greenfield priority areas was adopted in relation to the Yaldhurst Sports and Recreation Facility owned by Canterbury Sports Limited. As in that case, the proposed amendment to the Regional Policy Statement here would enable commercial film or video production facilities as a policy exception to the general requirement to avoid new development outside existing urban areas and greenfield priority areas.

5.21 The other proposed amendments seek to address aspects of commercial film or video production activities relating to infrastructure, noise and reverse sensitivity, and are considered appropriate to enable management of potential adverse effects relating to those matters.

5.22 The definition of “noise sensitive” activities currently within the Regional Policy Statement defines the types of activities deemed sensitive to higher noise levels being residential, educational and healthcare. Commercial film or video production activities do not share characteristics of these listed activities and as such this is made clear in the amendments proposed.

Outcome of the Proposed Amendments

- For the **Commercial Mixed Use** and **Commercial Central City Mixed Use** zones, commercial film or video production activities would go from being assessed as a discretionary activity, to having a permitted activity status subject to compliance with built form standards.

District wide standards would continue to apply, and it is likely that any proposal would need resource consent under the High Trip Generator rule (restricted discretionary and predetermined as non-notified).

- For **Industrial** zones, commercial film or video production activities would go from being assessed as a discretionary or non-complying activity, to having a permitted activity status subject to compliance with built form standards.

District wide standards would continue to apply, and it is highly likely that any proposal would need resource consent under the High Trip Generator rule (restricted

¹⁴ Note that the relevant District wide rules are amended to apply to commercial film or video production activities with respect to the requirement for acoustic insulation relevant to airport noise. This amendment does not negate that requirement.

discretionary and predetermined as non-notified).

- For the **Rural Urban Fringe** and **Rural Templeton** zones, commercial film or video production activities would go from being assessed as a non-complying activity, to having a permitted activity status subject to compliance with activity specific and built form standards.

District wide standards would continue to apply, and it is likely that any proposal would need resource consent under the High Trip Generator rule (restricted discretionary and predetermined as non-notified).

In addition, and depending on site layout and design, the more restrictive rules in these rural zones may mean that a development needs to seek resource consent for a breach of building height or site coverage rules. A breach of either of these rules in these zones would require restricted discretionary activity consent. The height rules are not predetermined as non-notified (thus a decision on potential notification or limited notification would be made under the usual provisions of the RMA), whereas the site coverage rules are predetermined as non-notified. Additionally, if a development were to exceed 50% site coverage by buildings, impervious surfaces and outdoor storage in the Rural Templeton zone, it would require resource consent as a non-complying activity.

6. GCR ACT CONSIDERATIONS

6.1 The GCR Act and its tools (including the power under section 71) were passed for the specific purpose of supporting the regeneration of greater Christchurch through:

- (a) *Enabling a focused and expedited regeneration process;*
- (b) *Facilitating the ongoing planning and regeneration of greater Christchurch;*
- (c) *Enabling community input into decisions on the exercise of powers under section 71 and the development of Regeneration Plans;*
- (d) *Recognising the local leadership of Canterbury Regional Council, Christchurch City Council, Regenerate Christchurch, Selwyn District Council, Te Rūnanga o Ngāi Tahu, and Waimakariri District Council and providing them with a role in decision making under the Act; and*
- (e) *Enabling the Crown to efficiently and effectively manage, hold, and dispose of land acquired by the Crown under the Canterbury Earthquake Recovery Act 2011 or the Act.*

6.2 ‘Regeneration’ is defined in the GCR Act as:

- (a) *rebuilding, in response to the Canterbury earthquakes or otherwise, including—*
 - (i) *extending, repairing, improving, subdividing, or converting land:*
 - (ii) *extending, repairing, improving, converting, or removing infrastructure, buildings, and other property:*
- (b) *improving the environmental, economic, social, and cultural well-being, and the resilience, of communities through—*
 - (i) *urban renewal and development:*
 - (ii) *restoration and enhancement (including residual recovery activity).*

urban renewal means the revitalisation or improvement of an urban area, and includes—

- (a) *rebuilding:*
- (b) *the provision and enhancement of community facilities and public open space.*

6.3 Providing a clear, certain and enabling planning framework for the development of commercial film or video production facilities would enable the conversion of land and/or infrastructure and/or buildings for such purposes thus contributing to regeneration by rebuilding as set out above.

6.4 Moreover, consistent with the definition of “urban renewal”, providing for the development of commercial film or video production facilities in the zones identified as appropriate for such development will contribute to the revitalisation and improvement of these areas.

6.5 Although some rural zones are included in the proposed amendments, development in such zones can still constitute *urban renewal* (being the *revitalisation or improvement of an urban area*).¹⁵ “Urban area” is not defined in the GCR Act. However, the Regulatory Impact Statement was clear that there was a distinction to be made between the “rural areas of

¹⁵ Greater Christchurch Regeneration Act 2016, section 3(2).

Selwyn District and much of Waimakariri District and Banks Peninsula” where urban regeneration was considered to be “less relevant” and the balance of the Greater Christchurch Area (considered to comprise the metropolitan areas of Christchurch City and Lyttelton Basin, and urban satellites in Selwyn and Waimakariri). The geographical scope of the Act was stated to include “*all areas where there is a reasonable case for needing to use powers for regeneration purposes*”.¹⁶ There is, therefore, no evidence to support a proposition that the GCR Act intended to limit the term “urban areas” to include only those areas that have a fully urban zoning within the relevant District Plan.

6.6 Commercial film or video production facilities bring economic activity and employment opportunities to the areas in which they locate. In addition, physical revitalisation or improvement of existing land and/or infrastructure and/or buildings can be supported through the application of the amendments together with the operation of the existing standards in the District Plan. By enabling commercial film or video production facilities in this manner, the regeneration outcomes can be realised while ensuring that the environmental outcomes sought in the District Plan are also realised.

6.7 Commercial film or video production facilities are examples of urban renewal and development which improve the wellbeing and resilience of communities. Analysis prepared as part of this Proposal illustrates that:

- (a) In terms of **social wellbeing**: a permanent commercial film or video production facility could offer employment opportunities for approximately 270 people if, as conservative estimates indicate, it was capable of securing 10% of the film production activity in New Zealand. That number could be expected to rise significantly if larger scale production was secured. By way of example, work undertaken by ChristchurchNZ estimates that securing 5% of the total investment proposed for Amazon’s \$1.5b Lord of the Rings television series would provide approximately 640 jobs in greater Christchurch.¹⁷

Available data on employee numbers and types of employment within the film industry also indicates that the establishment of film studios in the Christchurch district could offer a particular opportunity to improve the social and economic wellbeing of young people.

Young people are strongly represented in employment statistics for the film industry, with a report commissioned in November 2017 from the New Zealand Institute of Economic Research indicating that 68% of workers in the industry are less than 40 years old.¹⁸ Extrapolating that demographic to the job creation projections set out in the analysis by Development Christchurch Limited referenced above would translate into a variety of employment opportunities for approximately 183 people aged under the age of 40.¹⁹ With unemployment rates in economic downturns being generally much higher for young people when compared to other parts of the workforce²⁰, industries which enable and attract youth employment offer particular value to the Christchurch district in the current post pandemic circumstances.

¹⁶ Regulatory Impact Statement (2015) Greater Christchurch Regeneration Bill, October 2015, Canterbury Earthquake Recovery Authority.

¹⁷ ChristchurchNZ (2019) *The Economic Impact of the Screen Entertainment Industry in Canterbury*, July 2019.

¹⁸ Bealing, M. Krieble, T. (2017) *The economic contribution of the screen industry*, New Zealand Institute of Economic Research, November 2017, at 5.4.

¹⁹ Refer also Development Christchurch Limited, Balderstone, M (2020) *Economic Benefit of Production Studios for Greater Christchurch Region*, June 2020 for discussion on variety of employment opportunity within the film industry.

²⁰ Johnson, A (2016) *Addressing New Zealand’s Youth Unemployment*, The Salvation Army Social Policy and Parliamentary Unit, October 2016, page 1; see also Tipper, A., Fromm, A. (2013) *Earning, learning or concerning? Youth labour market outcomes and youth incomes before and after the recession*, Paper presented at the New Zealand Association of Economists Conference at Wellington, New Zealand, page 9.

Further, the establishment of commercial film or video production facilities offers the opportunity to integrate with, and add value to, tertiary courses related to the screen industry that are already delivered by the three major tertiary education providers within the Christchurch district.²¹

- (b) With respect to **cultural wellbeing**, work undertaken by Regenerate Christchurch (and shared with Mahaanui Kurataiao Limited on behalf of Te Rūnanga o Ngāi Tahu and Te Ngai Tūāhuriri Rūnanga during the development of this Proposal), identifies a range of increased funding, educational and training opportunities for Māori (and particularly Māori rangatahi) within the New Zealand film industry.

A wide variety of organisations and entities participate in the screen industry in New Zealand, ranging from non-profit advocacy and promotional agencies to commercial film production companies and training programme providers. A number of these entities have specific initiatives targeted toward supporting Māori and Pasifika in the industry and/or are established specifically for that purpose. Approximately \$43 million of Crown funding has been granted to projects produced by Māori owned production companies, and/or written and directed by Māori for film or television through to 2013. Accordingly, it can be viewed as an important contributor to Māori economic development, and to aspirations for revitalisation of language, culture and authentic Māori authorship.²²

The recently released draft Screen Sector Strategy 2030 is based on four 'values' of tikanga Māori and identifies a purpose and vision for the screen industry in New Zealand, and five goals and matching outcomes designed to fulfill that purpose and vision. It also establishes the framework for a three year plan to implement those goals. In its description of challenges and opportunities in the industry, the draft Strategy highlights both the importance and value of Te Ao Māori and tikanga generally in shaping both how the industry functions and the content it produces. It also identifies that elements of tikanga are already being incorporated into production practice, and that there is further opportunity for the sector to show its commitment to Te Tiriti o Waitangi by working more closely with iwi and the Māori screen production community, and by supporting further development of indigenous creators and businesses.²³

Haea Te Awa is an economic development strategy developed by Te Rūnanga o Ngāi Tahu in response to the Papatipu Rūnanga Aspirations Group presentations, 'Auahi-Auora', in 2016. A central theme in those presentations (now reflected in Haea Te Awa) was the need for a new phase for Te Rūnanga o Ngāi Tahu moving forward, with focus on regional rangatiratanga and papatipu rūnanga development. In November 2019, the Regional Development Strategy was approved as a pou within the Haea Te Awa programme. The core principle of that Strategy is to "enable papatipu rūnanga and whānau to achieve economic self determination in order to improve whānau outcomes". Among other matters, the Strategy is designed to achieve improved employment and business ownership opportunities for whānau, and to increase the mana and presence of each papatipu rūnanga within their respective takiwā. Implementation of the Strategy is identified to first require the establishment of a regional investment fund to invest alongside papatipu rūnanga in regional opportunities. It is understood that the fund is aimed to be established and 'open for business' by 1 July 2020.²⁴

²¹ Ara Institute of Technology, University of Canterbury and Yoobee School of Design.

²² Dr. Ella Henry and Melissa Wikaire *The Brown Book: Māori in Screen Production* (Te Ara Poutama, July 2013) at 36.

²³ *Aotearoa New Zealand Screen Sector Strategy 2030*, Draft – March 2020, page 17; <https://screensectorstrategy.nz.files.wordpress.com/2020/04/draft-screen-sector-strategy-as-at-804.pdf>

²⁴ Haea Te Awa – Regional Development Strategy, < <https://ngaitahu.iwi.nz/runanga/haea-te-awa/regional-development-strategy/>>

Funded through collaboration between Te Rūnanga o Ngāi Tahu and the JR McKenzie Trust, Tokona Te Raki is a Māori “future-making” organisation with a mission to “use social innovation tools and techniques to drive longer term systemic change boosting Māori success and tackling inequality and racism at its roots”. Its vision is for all rangatahi to be inspired by their futures, thriving in education and confident in their culture and determining their own path. It has a goal to see equity in education, employment and income for all Ngāi Tahu and Māori in the Ngāi Tahu takiwā by 2040.²⁵ The core areas in which Tokona Te Raki works to deliver these outcomes include:

- (i) Influence – connecting partners with rangatahi who can support them to transfer their practices and collectivise their impact (for example, events, publications, partnerships).
- (ii) Innovation – Supporting rangatahi future-makers to take on leadership roles in their communities and to create solutions to the challenges and opportunities they see in the world (for example, rangatahi internships, training workshops and wānanga, prototyping and solution building).

Most relevantly for the Proposal, Tokona Te Raki recognises that:

- (i) the future of work globally and in New Zealand is undergoing a significant shift and will require different skills, continual upskilling and flexibility in the face of technological advancements, automation and globalisations;
- (ii) rangatahi Māori represent the fastest growing sector of New Zealand’s population, and by 2038 the Māori workforce will comprise a fifth of the working age population; and
- (iii) many rangatahi are not currently being equipped with the tools necessary to succeed in the future of work, and that new whānau-centred solutions linking education providers, employers and communities are required to address this.

Overall, and against this background, it is considered that the continued growth and development of the New Zealand film industry, including via the enablement of new commercial film or video production facilities in the Christchurch district, has the potential to positively impact cultural wellbeing.

- (c) In terms of **economic wellbeing**: the economic analysis undertaken by Development Christchurch Limited establishes a conservative base-case scenario where four smaller feature films and 20 smaller screen series and one-off productions are secured per year (representing approximately 10% and 1% of the annual national production activity respectively).²⁶ In that case, a facility could expect to generate approximately \$50m per year in additional revenue for greater Christchurch for every year of the production. That figure does not account for any potential economic benefit from film distribution/exporting or related “down-stream” industries (including film based tourism).

If a larger production, such as a feature film, were to be secured alongside a range of other small screen and commercial production activities, the economic benefits in terms of additional revenue generated are estimated to increase significantly from \$50m to three or four-fold that amount.²⁷ In this regard, the analysis by

²⁵ < <http://www.maorifutures.co.nz/our-vision/> >

²⁶ Development Christchurch Limited, Balderstone, M (2020) *Economic Benefit of Production Studios for Greater Christchurch Region*, June 2020.

²⁷ Development Christchurch Limited, Balderstone, M (2020) *Economic Benefit of Production Studios for Greater Christchurch Region*, June 2020.

Development Christchurch Limited is consistent with work undertaken by ChristchurchNZ which suggests that if a Christchurch-based studio could secure 5% of a large scale production such as Amazon's proposed Lord of the Rings television series, it could generate \$124m in additional sales and a further \$59.8m in additional gross value to the Canterbury economy.²⁸

At either end of this spectrum, the potential economic benefits generated by film studio developments would be experienced by a range of suppliers and service industries required for production, including freight and storage, accommodation, food and beverages, air transport, and a wide range of equipment providers.²⁹

- (d) In terms of **environmental wellbeing**, the proposed amendments have been developed to provide the opportunity for these facilities to locate in appropriate areas of the Christchurch district in a manner which supports the environmental outcomes sought for those areas and the wellbeing of the communities that live and/or work within them. As described above, the zones subject to the proposed amendments are those which already seek to enable activities that share similar characteristics to typical film-studio developments.³⁰ These facilities are therefore expected to be generally consistent with the existing functions of these zones and the environmental outcomes they secure. For that reason, while the proposed amendments are necessary if the opportunity to establish these facilities in the Christchurch district is to be realised, they are also limited in their scope and application.

The development of permanent commercial film or video production facilities in the identified zones utilises the existing provisions of the District Plan to ensure that they are constructed and operated in a way which maintains the environmental standards designed to protect the environmental wellbeing of the surrounding communities. Moreover, planning analysis has confirmed that the establishment of these facilities, as enabled and shaped by the proposed amendments, is consistent with the existing objectives and policies of both the Regional Policy Statement and the District Plan.

6.8 In summary, if approved by the Minister in accordance with section 69 of the GCR Act, the Proponent considers that this Proposal would provide for an activity which would support the regeneration of greater Christchurch as that term is defined under the Act. The exercise of power would also:

- (a) *Enable a focussed and expedited regeneration process.* As set out below, compared to the alternative options available, the Minister's exercise of the power under section 71 is considered by the Proponent to be the most expedient way of enhancing the District Plan and the Regional Policy Statement's recognition of, and provision for, commercial film or video production facilities to locate in the Christchurch district. The proposed amendments are limited in scope and application and are focussed specifically on enabling focused consideration of an activity that has regeneration benefits for the Christchurch district, greater Christchurch and the New Zealand film industry generally.
- (b) *Facilitate the ongoing planning and regeneration of greater Christchurch.* The enhanced provision for these activities in the Christchurch district is consistent with the various strategic directions and initiatives undertaken by key agencies that are focussed on supporting the wellbeing and growth of the city. The Christchurch Economic Development Strategy 2017 outlines the strategic priorities and projects

²⁸ ChristchurchNZ (2019) *The Economic Impact of the Screen Entertainment Industry in Canterbury*, July 2019.

²⁹ Bealing, M. Krieble, T. (2017) *The economic contribution of the screen industry*, New Zealand Institute of Economic Research, November 2017 at p10.

³⁰ Boffa Miskell Limited (2020) *Film Studio Proposal – Planning Assessment*. Report prepared for Regenerate Christchurch, 17 June 2020, 3.3.

of over 20 agencies contributing to economic growth for the city. Consistent with Christchurch City Council's overarching Strategic Framework, its focus is on recognising that Christchurch is a city of opportunity – “a place where people and enterprise choose to be”; “a place that is open to new ideas, new people, and new ways of doing things, and where anything is possible”.

This Proposal seeks to enhance the current planning framework to better enable the opportunity presented by permanent commercial film or video production facilities to be realised. To that end, approval of this Proposal is considered by the Proponent to support the realisation of this broader vision for the city.

Approval of this Proposal would also support the overarching aspiration in ChristchurchNZ's Prosperity Framework for Christchurch to be “an internationally relevant city; attractive to people, high value business and investment”. According to the Framework, core to realising that aspiration over the long term will be Christchurch's ability to grow scale and value in areas of regional strength with global growth headroom. The film industry has been identified by ChristchurchNZ as an area that has the potential to contribute to that aspiration.³¹

- (c) *Enable community input into decisions on the exercise of powers.* If the Minister decides to proceed with the Proposal, a public notice published by the Minister will invite written comments on the Proposal, which must be taken into account before making a final decision on exercising the power. That statutory process will provide the opportunity for the greater Christchurch community to have input on this Proposal.
- (d) *Recognise the local leadership of Canterbury Regional Council, Christchurch City Council, Regenerate Christchurch, Selwyn District Council, Te Rūnanga o Ngāi Tahu, and Waimakariri District Council in decision-making.* As one of the local leadership organisations mandated by the GCR Act, Regenerate Christchurch has prepared this Proposal following a request from Christchurch City Council (also identified within the GCR Act as a local leadership entity) to consider doing so in view of the opportunity these facilities present for the district. The initiating engagement by Christchurch City Council and the ensuing development of this Proposal by Regenerate Christchurch is therefore consistent with the local leadership that the Act was intended to deliver.

In addition, during the preparation of this Proposal Regenerate Christchurch has engaged with its strategic partners (Christchurch City Council, Selwyn District Council, Waimakariri District Council, Environment Canterbury and Te Rūnanga o Ngāi Tahu) together with the Department of Prime Minister and Cabinet. Their views have been sought in accordance with section 66 of the GCR Act, and have been considered as set out in the Concise Statement of Views prepared by Regenerate Christchurch (**Appendix 4**).

Explanation of why the exercise of power is necessary and preferable to any alternatives to the exercise of power

- 6.9** In considering the available options to effect changes to the District Plan and Regional Policy Statement to better enable and encourage commercial film or video production facilities, thought has firstly been given to the most appropriate decision making framework and secondly, within that framework, to the most timely and appropriate mechanism.
- 6.10** The GCR Act and its tools were passed for the specific purpose of supporting the regeneration of greater Christchurch. It is therefore considered that, for proposals that

³¹ ChristchurchNZ (2019) *Regional Growth Plan Briefing Document*, Growth Forum 28 February 2019, at page 17, <https://www.christchurchnz.com/media/stcl3pov/1-regional-growth-plan-briefing-document.pdf>

achieve that purpose, it is *prima facie* preferred as the most appropriate decision-making lens to apply.

- 6.11** Secondly, the GCR Act enables multiple planning instruments to be amended contemporaneously, thus accelerating the process. In the current circumstance, where amendments are required to both the District Plan and the Regional Policy Statement, the GCR Act is therefore also to be preferred as the most expedient.
- 6.12** As the Court of Appeal in *Independent Fisheries* made clear, expediency to no particular end is insufficient to establish that use of these tools is necessary.³² Expediency in enabling opportunity however becomes highly relevant to that determination where the context indicates that the failure to take expedient, bold action could frustrate the regeneration of greater Christchurch.
- 6.13** To that end, analysis from various agencies in recent years suggests that such action is necessary if greater Christchurch is to achieve its aspirations of becoming “a vibrant, competitive urban centre”, a “go-to place”³³ that is “open for business”³⁴ and a genuine “leading city in New Zealand”.³⁵ Commensurate with that, ChristchurchNZ’s *Christchurch Prosperity Framework* released in 2018 identified that the immediate challenge for Christchurch in the short term is delivering levels of economic activity (or building demand) that justify continued investment in the regeneration of the city. It also acknowledges that “Christchurch’s near and long term future will be significantly influenced by its success over the next few years in maintaining the regeneration momentum”.³⁶
- 6.14** Economic data collated by various agencies has highlighted a consistent decline in the growth of Christchurch’s gross domestic product over the period 2015 to 2019.³⁷ In Quarter 4 of 2019, that low rate and continuous shift to an economy less reliant on rebuild investment was forecast to continue putting pressure on the growth of the district. In such circumstances, an expedited response is both necessary and preferable.

Development of a Regeneration Plan under section 28 – 39 of the GCR Act

- 6.15** A Regeneration Plan under the GCR Act would enable the Minister to direct amendments to the District Plan and the Regional Policy Statement simultaneously.
- 6.16** Development of a Regeneration Plan is a two-stage process that requires the preparation of a draft outline, and then a draft Regeneration Plan. Reflecting the two stage approach, a regeneration plan can provide more opportunities for public input where this is warranted, for example, in the development of a community vision for a particular area.
- 6.17** Given the extended process for their development and approval, Regeneration Plans are generally considered to be better suited to more complex development proposals where the changes to the relevant RMA documents are more extensive and would benefit from being

³² *Canterbury Regional Council v Independent Fisheries Limited* [2012] NZCA 601, [2013] 2 NZLR 57, [17] – [23].

³³ Advisory Board on transition to long term recovery arrangements (2015) *First Report to the Minister for Canterbury Earthquake Recovery*, July 2015, at page 3.

³⁴ Ibid.

³⁵ Advisory Board on transition to long term recovery arrangements (2015) *Final Report to the Minister for Canterbury Earthquake Recovery*, December 2015, page 7. That analysis includes Westpac McDermott Miller (2019) *Regional Economic Confidence – December 2019*, <https://www.westpac.co.nz/assets/Business/Economic-Updates/2019/Bulletins-2019/Q4-Regional-Economic-Confidence-December-2019.pdf>; ChristchurchNZ (2018) *Christchurch Prosperity Framework 2018 – 2028: Addressing challenges and realising potential*, page 3, 4 and Appendix 1; Regenerate Christchurch, (2018) *Central City Momentum*, 30 June 2018.

³⁶ ChristchurchNZ, *Prosperity Framework*, at page 12.

³⁷ ChristchurchNZ (2019) *Quarterly Economic Update: Christchurch and Canterbury Economic Data – Quarter 2 2019*, June 2019, page 3.

accompanied by a supporting narrative in the form of the Regeneration Plan itself (which is also given specific statutory protection by the GCR Act).³⁸

- 6.18** In terms of timing, existing Regeneration Plans illustrate that the process for their development takes significantly longer than a proposal for an exercise of power under section 71. From preparation of the outline through to approval of the draft Regeneration Plan by the relevant Minister, the Cranford Regeneration Plan process took one year, while the Ōtākaro Avon River Corridor took three years, reflecting its more complex subject matter. As with an exercise of power under section 71, Ministerial decision-making is required to progress – and ultimately approve – a Regeneration Plan. The upcoming election could further impact the expected timeframes for this option.

Development of a Proposal authorised under Section 71 of the GCR Act

- 6.19** Section 65 of the GCR Act authorises a proponent to propose an exercise of power by the Minister under section 71 of the GCR Act. Where the Minister has decided to do so in accordance with section 69 of the GCR Act, section 71 authorises the Minister to, by notice in the Gazette, suspend, amend, or revoke all or part of the instruments identified in section 71(2) including the Christchurch District Plan and the Canterbury Regional Policy Statement.
- 6.20** As with a Regeneration Plan, the power under section 71 of the GCR Act was granted to support initiatives which could contribute to the regeneration of greater Christchurch. In proposing the exercise of this power, opportunities are provided for the strategic partners and DPMC to provide their views on the relevant proposal. If the Minister determines to proceed with the proposal, the public are also provided with an opportunity to comment.
- 6.21** Although designed to achieve a similar outcome to a regeneration plan, the exercise of power under section 71 is considered to better suit more discrete and stand alone amendments to the relevant planning instruments which do not require the additional explanation, analysis or additional statutory protections that can be found in a regeneration plan. For that reason, the process is somewhat more straightforward and therefore results in a shorter expected timeframe. Taking into account the time required to prepare this Proposal, completion of the statutory process could take between four to six months. While the upcoming election could extend this timeframe for three – four months, it would still represent the most expedient option currently available.

RMA Alternatives

- 6.22** In addition to options under the GCR Act, the following alternative options currently exist:
- (a) Do nothing.
 - (b) Using Schedule 1 of the RMA, initiate a change to the Regional Policy Statement. Once that change has been approved, initiate a change to the District Plan.
 - (c) Under section 80C and using Schedule 1 of the RMA, initiate a change to the Regional Policy Statement. Once that change has been approved, initiate a change to the District Plan.

Do nothing

- 6.23** As set out above, the operation of the current District Plan and the Regional Policy Statement would make obtaining consent for commercial film or video production facilities complex, lengthy, expensive and without any certainty of outcome. These conditions serve

³⁸ Refer Greater Christchurch Regeneration Act 2016, section 60; Regulatory Impact Statement (2015) Greater Christchurch Regeneration Bill, October 2015, Canterbury Earthquake Recovery Authority at [105].

to discourage applicants from pursuing their development aspirations in the Christchurch district, which in turn results in the loss of potential benefits that they could offer.

- 6.24** The “do nothing” option will result in the continuation of these conditions which may prevent or hinder the development of facilities that might otherwise contribute to the regeneration of the Christchurch district and greater Christchurch. As such, it is not considered to be the preferred approach.

A change to the Regional Policy Statement followed by a change to the District Plan under Schedule 1 of the RMA

- 6.25** Under the RMA, a district plan must give effect to, or implement, a regional policy statement. Provisions within a district plan which are inconsistent with, or do not implement, the provisions of the regional policy statement are unlawful. For that reason, changes to both the District Plan and the Regional Policy Statement would be required to enable the development and operation of commercial film or video production facilities in the Christchurch district.

- 6.26** Unlike the GCR Act however, the RMA does not enable changes to regional policy statements and district plans within a single process unless those documents form part of a combined document prepared under section 80 of the RMA. That is not the case in greater Christchurch. As such, the necessary changes to those documents would need to be progressed sequentially, with the changes to the District Plan being conditional on the prior approval of the changes to the Regional Policy Statement.

- 6.27** Schedule 1 of the RMA governs how changes are made to regional policy statements and district plans. Only a territorial authority or Minister of the Crown may request a change to a regional policy statement, while any person may request a change to the district plan. For both documents, the proposed change is prepared, notified for public submission and further submissions, and hearings are held if required. In assessing a request for a change to either document, the critical inquiry for the decision-maker is whether it will promote the sustainable management of natural and physical resources. The decision on whether to approve the change may be subject to appeal to the Environment Court.

- 6.28** The completion of one of these processes (without the decision being subject to appeal) can take between 10 – 14 months. Any appeal of the final decision could add a further 12 months to the process. Allowing for completion of both processes sequentially (being the necessary changes to the Regional Policy Statement followed by the necessary changes to the District Plan), could be expected to take up to four years. This is before any application for a commercial film or video production facility could be expected to apply for or gain consent to locate in the Christchurch district.

A change to the Regional Policy Statement followed by a change to the District Plan under Section 80C of the RMA

- 6.29** This process enables councils to make a request to the Minister for the Environment to use a streamlined planning process, if one of six criteria can be met. It is highly unlikely that a film studio development would meet any of these criteria, and as such, this is not considered to be a realistic option. The same analysis above regarding the Schedule 1 option similarly applies to this alternative.

Other options

- 6.30** The COVID-19 Recovery (Fast-Track Consenting) Bill was made publicly available on 16 June 2020. While the Bill provides some indication of the scope of the proposed legislation, there is no guarantee that it will be passed, or, if it is, that it will be passed in its current form. As such, it is considered inappropriate to identify it as a viable alternative at this time.

Conclusion

- 6.31** As set out in this Proposal, commercial video or film production facilities in the Christchurch district have the potential to positively impact the economic and social wellbeing of the greater Christchurch community in circumstances where those indicators are at high risk of decline. Pursuit of an RMA approval for this Proposal under Schedule 1 would increase the risk that these regeneration benefits are compromised in terms of timeliness of delivery, if not entirely lost. That prospect is considered to be at odds both with the aspirations for greater Christchurch's regeneration and with the wider response towards economic and social recovery. As such, that option cannot be considered preferable.
- 6.32** While a Regeneration Plan under the GCR Act would ensure that the Proposal is assessed through the "regeneration lens", a Regeneration Plan is also considered to be less preferable than a section 71 proposal given the reasonably discrete nature of the proposed amendments and the absence of any requirement for the supporting statutory narrative found in a Regeneration Plan.
- 6.33** Approval of this Proposal under section 71 of the GCR Act will expediently result in a planning framework that is clear and appropriate in how it addresses commercial video or film production facilities the Christchurch district. This will create increased certainty both of process and outcome for those advising on such facilities (including the Council), those looking to invest in and/or establish them, and for the community in understanding where and how they are provided for. The anticipated result is that this increased clarity and certainty will encourage these facilities to locate in the Christchurch district in the near future, bringing with them economic and employment opportunities that could contribute to improving the wellbeing and resilience of the region and wider New Zealand.
- 6.34** In such circumstances, the exercise of power to approve this Proposal is considered to be both necessary and preferable to all other alternatives.

7. CONCLUSION

- 7.1** Based on the analysis outlined above Regenerate Christchurch considers that the exercise of power under section 71 of the GCR Act to amend the District Plan and the Regional Policy Statement as set out in **Appendix 1** of this Proposal is both necessary to enable the identified regeneration opportunity and preferable to any of the alternative options available.
- 7.2** In providing this Proposal to the Minister, it is the view of Regenerate Christchurch, that the Proposal meets the purposes of the GCR Act, and will enable the improvement of social, cultural, economic and environmental well-being and the potential realisation of regeneration benefits for the Christchurch district, greater Christchurch, the wider Canterbury region and the New Zealand film industry generally.

APPENDIX 1 - PROPOSED AMENDMENTS

Proposed amendments to the Canterbury Regional Policy Statement

(Text proposed to be inserted is shown in red underlined while deletions are shown ~~red struck through~~.

CHAPTER 6 - RECOVERY AND REBUILDING OF GREATER CHRISTCHURCH

6.3.1 Development within the Greater Christchurch area

In relation to recovery and rebuilding for Greater Christchurch:

...

6. provide for commercial film or video production activities in appropriate commercial, industrial and rural zones within the Christchurch District;

~~76.~~ provide for a metropolitan recreation facility at 466-482 Yaldhurst Road; and

~~87.~~ avoid development that adversely affects the function and viability of, or public investment in, the Central City and Key Activity Centres.

Principal reasons and explanation

To ensure that recovery resources are managed efficiently and sustainably, the provisions identify where certain types of development can take place, and where they cannot take place. The provisions also recognise that specific activities are provided for outside of urban areas elsewhere in the CRPS, such as papakāinga housing and marae under Policy 5.3.4; educational facilities where no other practicable options for locating the facility exist; commercial film or video production to support the regional economy and provide employment opportunities; and a metropolitan recreation facility at 466-482 Yaldhurst Road that serves the urban population. It is anticipated that established urban activities located outside of the identified urban area will be able to continue to operate their activities, with any expansion considered on a case-by-case basis.

6.3.5 Integration of land use and infrastructure

Recovery of Greater Christchurch is to be assisted by the integration of land use development with infrastructure by:

...

2. Ensuring that the nature, timing and sequencing of new development are co-ordinated with the development, funding, implementation and operation of transport and other infrastructure in order to:
 - a. optimise the efficient and affordable provision of both the development and the infrastructure;
 - b. maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure;
 - c. protect investment in existing and planned infrastructure; ~~and~~

required to support Greater Christchurch’s recovery through transporting such things as building materials, equipment and personnel. The locational requirements and existing investment in strategic infrastructure means that it is extremely inefficient for them to relocate, and effects of land use on their operation can significantly reduce efficiency and attractiveness as transport options. The operation of strategic infrastructure can affect the liveability of residential developments in their vicinity, despite the application of practicable mitigation measures to address effects, which in turn exerts pressure on the infrastructure to further mitigate their effects. It is better to instead select development options, including activities such as commercial film or video production which are compatible with the strategic infrastructure, where such reverse sensitivity constraints do not exist.

The only exception to the restriction against residential development within the 50dBA LdN airport noise contour is provided for at Kaiapoi.

Within Kaiapoi land within the 50dBA Ldn airport noise contour has been provided to offset the displacement of residences as a result of the 2010/2011 earthquakes. This exception is unique to Kaiapoi and also allows for a contiguous and consolidated development of Kaiapoi.

6.4 Anticipated Environmental Results

...

5. Infrastructure, and urban and rural development, are developed in an integrated manner.

6. The use of existing infrastructure is optimised.

...

19. Development opportunities for a metropolitan recreation facility at 466-482 Yaldhurst Road are provided for.

20. Commercial film or video production activities are enabled to support the regional economy and provide employment opportunities.

DEFINITIONS FOR GREATER CHRISTCHURCH

<u>Commercial film or video production</u>	<u>means activities and buildings associated with the creation of a film or video product where undertaken by a professional production company but excludes any residential activity. It excludes filming by news organisations, students or private individuals.</u>
Noise sensitive activities	means <ul style="list-style-type: none"> Residential activities other than those in conjunction with rural activities that comply with the rules in the relevant district plan as at 23 August 2008;

- Education activities including pre-school places or premises, but not including flight training, trade training or other industry related training facilities located within the Special Purpose (Airport) Zone in the Christchurch District Plan;
- Travellers' accommodation except that which is designed, constructed and operated to a standard that mitigates the effects of noise on occupants;
- Hospitals, healthcare facilities and any elderly persons housing or complex.

But does not include:

- Commercial film or video production activity.

Proposed amendments to the Christchurch District Plan

(Text proposed to be inserted is shown in red underlined while deletions are shown ~~red struck through~~.

Chapter 2 Definitions

Commercial film or video production

means activities and buildings associated with the creation of a film or video product where undertaken by a professional production company but excludes any residential activity. It excludes filming by news organisations, students or private individuals.

Sensitive activities

means:

- a. residential activities, unless specified below;
- b. care facilities;
- c. education activities and preschools, unless specified below;
- d. guest accommodation, unless specified below;
- e. health care facilities which include accommodation for overnight care;
- f. hospitals; and
- g. custodial and/or supervised living accommodation where the residents are detained on the site;

but excludes in relation to airport noise:

- h. any residential activities, in conjunction with rural activities that comply with the rules in the relevant district plans as at 23 August 2008;
- i. flight training or other trade and industry training activities located on land zoned or legally used for commercial activities or industrial activities, including the Specific Purpose (Airport) Zone;

j. commercial film or video production activities; and

~~j. k.~~ guest accommodation which is designed, constructed and operated to a standard to mitigate the effects of aircraft noise on occupants.

Chapter 3 Strategic Objectives

3.3.7 Objective -- Urban growth, form and design

- a. A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that:

...

- iii. Provides for urban activities only:
 - A. within the existing urban areas unless they are otherwise expressly provided for in the CRPS; and

- B. on greenfield land on the periphery of Christchurch's urban area identified in accordance with the Greenfield Priority Areas in the Canterbury Regional Policy Statement Chapter 6, Map A; and ...

Chapter 6 General Rules and Procedures

6.1 Noise

6.1.7.2.2 Activities near Christchurch Airport

- a. The following activity standards apply to new buildings and additions to existing buildings located within the 55 dB Ldn air noise contour or the 55 dB Ldn engine testing contour shown on the planning maps:
- i. Any new buildings and/or additions to existing buildings shall be insulated from aircraft noise and designed to comply with the following indoor design sound levels:
- A. Residential units:
- I. Sleeping areas – 65 dB LAE/40 dB Ldn
 - II. Other habitable areas – 75 dB LAE /50 dB Ldn
- B. Guest accommodation, resort hotels, hospitals and health care facilities:
- I. Relaxing or sleeping - 65 dB LAE /40 dB Ldn
 - II. Conference meeting rooms - 65 dB LAE / 40 dB Ldn
 - III. Service activities – 75 dB LAE /60 dB Ldn
- C. Education activities:
- I. Libraries, study areas – 65 dB LAE /40 dB Ldn
 - II. Teaching areas, assembly areas – 65 dB LAE /40 dB Ldn
 - III. Workshops, gymnasiums – 85 dB LAE /60 dB Ldn
- D. Retail activities, commercial services and offices:
- I. Conference rooms – 65 dB LAE /40 dB Ldn
 - II. Private offices – 70 dB LAE /45 dB Ldn
 - III. Drafting, open offices, exhibition spaces - 75 dB LAE /50 dB Ldn
 - IV. Typing, data processing – 80 dB LAE /55 dB Ldn
 - V. Shops, supermarkets, showrooms - 85 dB LAE /60 dB Ldn

E. Sound stages, studios for filming and/or sound production for Commercial film or video production activities - 47 dB LAE

- ii. Noise insulation calculations and verification shall be as follows:
 - A. Building consent applications shall be accompanied with a report detailing the calculations showing how the required sound insulation and construction methods have been determined.
 - B. For the purpose of sound insulation calculations, the external noise levels for a site shall be determined by application of the air noise contours Ldn and LAE. Where a site falls within the contours the calculations shall be determined by linear interpolation between the contours.
 - C. If required by the Council, in conjunction with the final building inspection the sound transmission of the façade shall be tested in accordance with ISO 16283-3:2016 to demonstrate that the required façade sound insulation performance has been achieved, and a test report is to be submitted to the Council’s Head of Building Consenting (or any subsequent equivalent position). Should the façade fail to achieve the required standard then it shall be improved to the required standard and re-tested prior to occupation.

Chapter 15 Commercial

15.2 Objectives and Policies

15.2.7.1 Policy - Diversity of activities

- a. Enhance and revitalise the Commercial Central City Mixed Use Zone by enabling:

...

- vi. light service industry and commercial film or video production activity compatible with other activities envisaged for the zone; and ...

15.9 Rules - Commercial Mixed Use Zone

15.9.1.1 Permitted Activities

	Activity	Activity specific standards
P1	Any new building or addition to a building for any permitted activity	Nil

	listed in Rule 15.9.1.1 P3 to P8 and P11 to P27 below.	
...
P29	<u>Commercial film or video production</u>	<u>Nil</u>

15.11 Rules - Commercial Central City Mixed Use Zone

15.11.1.1 Permitted activities

	Activity	Activity specific standards
P1	Retail activity	...
...
P22	<u>Commercial film or video production</u>	<u>Nil</u>

Chapter 16 Industrial

16.2 Objectives and Policies

16.2.1.4 Policy - Activities in industrial zones

- a. Maintain and support the function of industrial zones while, subject to Clauses (b) and (c), providing for limited non-industrial activities that:
 - i. are ancillary in scale (subject to Clause (d)) and on the same site as a permitted or consented activity;
 - ii. are not appropriate in more sensitive environments due to their potential noise, odour or other environmental effects;
 - iii. incorporate characteristics that are compatible with the industrial zone and do not cause an undue constraint on other permitted activities within the zone;
 - iv. comprise yard based supplier or trade suppliers in the Industrial General Zone;
- ...

16.4 Rules - Industrial General Zone

16.4.1.1 Permitted activities

	Activity	Activity specific standards
P1	Any new building or addition to a building for any activity listed in Rule 16.4.1.1 P2 to P21.	Nil
...
<u>P22</u>	<u>Commercial film or video production</u>	<u>Nil</u>

16.5 Rules - Industrial Heavy Zone

16.5.1.1 Permitted activities

	Activity	Activity specific standards
P1	Any new building or addition to a building for any activity listed in Rule 16.5.1.1 P2 to P18.	Nil
...
<u>P19</u>	<u>Commercial film or video production</u>	<u>Nil</u>

16.6 Rules - Industrial Park Zone

16.6.1.1 Permitted activities

	Activity	Activity specific standards
P1	Any new building or addition to a building for any activity listed in Rule 16.6.1.1 P2 to P18.	Nil
...
<u>P19</u>	<u>Commercial film or video production</u>	<u>Nil</u>

Chapter 17 Rural

17.2 Objectives and Policies

17.2.2.1 Policy - Range of activities on rural land

- a. Provide for the economic development potential of rural land by enabling a range of activities that:
 - i. have a direct relationship with, or are dependent on, the rural resource, rural productive activity or sea-based aquaculture;
 - ii. have a functional, technical or operational necessity for a rural location; or

- iii. recognise the historic and contemporary relationship of Ngai Tahu with land and water resources;
- iv. provide for commercial film or video production activities and facilities on the rural flat land close to the main Christchurch urban area; and
- v. iv- represent an efficient use of natural resources.

17.5 Rules - Rural Urban Fringe Zone

17.5.1.1 Permitted activities

	Activity	Activity specific standards
P1	Farming	...
...
<u>P20</u>	<u>Commercial film or video production</u>	<ul style="list-style-type: none"> a. <u>The minimum site area for the activity shall be 6ha.</u> b. <u>The site shall be connected to reticulated water and wastewater.</u>

17.5.1.3 Restricted discretionary activities

- a. The activities listed below are restricted discretionary activities.

...

Activity		The Council's discretion shall be limited to the following matters:
RD1	<ul style="list-style-type: none"> a. Any activity listed in Rule 17.5.1.1 P1 - P19 and Rule 17.5.1.3 RD2 - RD9 that does not meet one or more of the built form standards in Rule 17.5.2, unless otherwise specified. ... 	As relevant to the built form standard that is not met: <ul style="list-style-type: none"> a. Building height – Rule 17.11.1.1; ...
...
<u>RD11</u>	<ul style="list-style-type: none"> a. <u>Any activity listed in Rule 17.5.1.1 P20 that does not meet activity specific standard a.</u> 	<ul style="list-style-type: none"> a. <u>Site area – Rule 17.11.2.18</u>

17.5.1.5 Non-complying activities

- b. The activities listed below are non-complying activities.

Activity

NC1	Any activity not provided for as a permitted, controlled, restricted discretionary, discretionary or prohibited activity.
...	...
NC6	<u>Any activity listed in Rule 17.5.1.1 P20 that does not meet activity specific standard b.</u>

17.5.2 Built form standards - Rural Urban Fringe Zone

17.5.2.6 Site coverage

The maximum percentage of the net site area, and the maximum total area, covered by buildings, impervious surfaces and outdoor storage areas shall be as follows:

	Activity	Standard
i.	Buildings and outdoor storage areas on sites greater than 4ha in area	5% of the net site area or 2,000m ² whichever is lesser
ii.	Buildings, impervious surfaces and outdoor storage areas on existing sites between 0.4 and 4ha in area	10% of the net site area or 2,000m ² whichever is the lesser
iii.	Buildings, impervious surfaces and outdoor storage areas on existing sites less than 0.4ha in area	35% of net site area
<u>iv.</u>	<u>For Commercial Film or Video Production activity on sites greater than 4ha in area:</u> 1. <u>Buildings</u> 2. <u>Total coverage by buildings, impervious surfaces, and outdoor storage</u>	<u>5% of the net site area</u> <u>40% of the net site area</u>

17.5.2.7 Vehicle trips

The maximum number of vehicle trips per site for all activities, other than for farming or Commercial Film or Video Production, shall be 100 per day.

17.5.2.9 Landscaping

For any Commercial Film or Video Production activity landscaping and trees shall be provided as follows:

	Standard
<u>i.</u>	<u>The minimum percentage of the site to have landscaping shall be 10%, excluding those areas required to be set aside for trees within or adjacent to parking areas (refer to clause (iv) below).</u>
<u>ii.</u>	<u>The area adjoining the road frontage of all sites shall have a landscaping strip in accordance with the following standards.</u> A. <u>Minimum width - 3 metres</u> B. <u>Minimum density of tree planting – 1 tree for every 10 metres of road frontage or part thereof.</u>

<u>iii.</u>	<u>On sites adjoining a residential zone, there shall be a landscaping strip along the shared boundary in accordance with the following standards.</u> A. <u>Minimum width - 3 metres</u> B. <u>Minimum density of tree planting – 1 tree for every 10 metres of boundary or part thereof.</u>
<u>iv.</u>	<u>In addition to clauses (i), (ii) and (iii) above, where parking areas are located at the front of a site, 1 tree shall be planted for every 5 car parking spaces within any car parking area.</u>
<u>v.</u>	<u>All landscaping/ trees required for these rules shall be in accordance with the provisions in Appendix 6.11.6 of Chapter 6.</u>

17.10 Rules - Rural Templeton Zone

17.10.1 Activity status tables - Rural Templeton Zone

	Activity	Activity specific standards
P1	Templeton rural activity	...
...
P5	<u>Commercial film or video production</u>	a. <u>The minimum site area for the activity shall be 6ha.</u> b. <u>The site shall be connected to reticulated water and wastewater.</u>

17.10.1.3 Restricted discretionary activities

a. The activities listed below are restricted discretionary activities.

...

Activity		The Council's discretion shall be limited to the following matters:
RD1	a. Any activity listed in Rule 17.10.1.1 P1 – P4 that does not meet one or more of the built form standards in Rule 17.10.2, except as provided for in Rule 17.10.1.5 below. ...	As relevant to the built form standard that is not met: a. Building height – Rule 17.11.1.1; ...
RD2	a. <u>Any activity listed in Rule 17.10.1 P5 that does not meet activity specific standard a.</u>	a. <u>Site area – Rule 17.11.2.18</u>

17.10.1.5 Non-complying activities

b. The activities listed below are non-complying activities.

	Activity
NC1	Any activity not provided for as a permitted, controlled, restricted discretionary, discretionary or prohibited activity.
NC2	Development and use of land not in accordance with the Templeton Development Plan in Appendix 17.12.2, <u>except for Commercial Film or Video Production activity.</u>
...	...
NC6	<u>Any activity listed in Rule 17.10.1.1 P5 that does not meet activity specific standard b.</u>
NC67	Buildings, impervious surfaces and outdoor storage areas in the Rural Templeton Business 1 and Rural Templeton Facilities Precincts in excess of 30% of the net site area.
NC78	Buildings, impervious surfaces and outdoor storage areas in the Rural Templeton Business 2 Precinct in excess of 20% of the net site area.
NC9	<u>Buildings, impervious surfaces and outdoor storage areas for a Commercial Film or Video Production activity in any precinct in excess of 50% of the net site area.</u>
...	...

17.10.2 Built form standards - Rural Templeton Zone

17.10.2.4 Site coverage

a. The maximum percentage of the net site area covered by buildings, impervious surfaces and outdoor storage areas shall be as follows:

	Applicable to	Standard
i.	Buildings, impervious surfaces and outdoor storage areas in the Rural Templeton Business 1 and Rural Templeton Facilities Precincts	Less than 20% of net site area
ii.	Buildings, impervious surfaces and outdoor storage areas in the Rural Templeton Business 2 Precinct	Less than 10% of net site area
iii.	<u>Buildings, impervious surfaces and outdoor storage areas for a Commercial Film or Video Production activity in any precinct</u>	<u>Less than 40% of net site area</u>

17.10.2.7 Vehicle trips

a. The maximum number of vehicle trips per site for all non-rural activities, except for Commercial Film or Video Production activities, shall be 100 per day.

b. Any application arising from this rule shall not be publicly notified.

17.11 Rules – Matters of Discretion

17.11.1 Matters of discretion for built form standards

17.11.1.13 Landscaping and trees

- a. The visual effects of buildings taking account of their scale and appearance, outdoor storage areas, car parking areas or other activities as a result of reduced landscaping.
- b. The extent to which the site is visible from adjoining residential sites and/or identified arterial roads fulfilling a gateway function and the likely consequences of any reduction in landscaping or screening on the amenity of those sites/roads.
- c. Whether there are any compensating factors for reduced landscaping or screening, including the nature or scale of planting proposed or the location of parking areas or manoeuvring areas.
- d. The extent to which the proposal is consistent with the anticipated amenity of the zone.
- e. The extent to which tree planting under the electricity transmission network would adversely affect the safe and efficient functioning of the electricity network or restrict maintenance of that network.
- f. The extent to which indigenous species are used to recognise and enhance Ngāi Tahu/manua whenua cultural values, particularly where development is located within a Site of Ngāi Tahu Cultural Significance identified in Appendix 9.5.6.
- g. The extent to which stormwater facilities are integrated into landscaped areas to achieve a multi-value approach.
- h. The appropriateness and placement of landscaping having regard to the potential adverse effects on safety for pedestrians and vehicles and the functional requirements of the activity.

17.11.2 Matters of discretion for activity specific standards

17.11.2.18 Site area

- a. Whether the smaller site area will enable the site to remain dominated by open space and landscaping rather than buildings, hard surfaces and outdoor storage areas.
- b. The extent to which the activity on a smaller site will impact on rural character and amenity values.
- c. Whether the size or location of the site will adversely impact on the ability to achieve a consolidated urban area.
- d. The ability of the activity to locate on another larger site or on an urban site.

APPENDIX 2 - DRAFT SECTION 68 NOTICE

DRAFT PUBLIC NOTICE:

OPEN FOR WRITTEN COMMENT

Proposal to exercise s71 of the Greater Christchurch Regeneration Act 2016 to amend the Christchurch District Plan and Canterbury Regional Policy Statement to provide for the development and operation of commercial film or video production facilities in the Christchurch District.

Pursuant to section 68 of the Greater Christchurch Regeneration Act 2016 (the **GCR Act**), the Associate Minister for Greater Christchurch Regeneration invites written comment on the Proposal to exercise the power under section 71 of the GCR Act to amend the Christchurch District Plan and Canterbury Regional Policy Statement to provide for the development and operation of commercial film or video production facilities in the Christchurch District.

The film industry has been identified as a sector which has the potential to deliver regeneration outcomes to the Christchurch District and greater Christchurch in the form of economic growth and job creation. The Proposal recommends limited changes to the Christchurch District Plan and the Canterbury Regional Policy Statement which will better provide for commercial film or video production facilities to be enabled in specified zones.

The amendments to the Christchurch District Plan include:

- (a) amending the existing definition of “commercial film or video production” to clarify that it does not incorporate any residential component;
- (b) inserting specific recognition for “commercial film or video production” activities within strategic objective 3.3.7;
- (c) inserting specific policies supporting the development of commercial film or video production activities within the commercial and industrial zones;
- (d) making “commercial film or video production” activities permitted in the following zones:
 - (i) Commercial Mixed Use.
 - (ii) Commercial Central City Mixed Use.
 - (iii) Industrial General.
 - (iv) Industrial Heavy.
 - (v) Industrial Park.
 - (vi) Rural Urban Fringe.
 - (vii) Rural Templeton.
- (e) inserting additional permitted activity standards in zones where these are required to ensure appropriate environmental outcomes.

The amendments to the Canterbury Regional Policy Statement include:

- (a) making express provision for commercial film or production activities to occur in the Christchurch district both within and outside of the existing urban areas and greenfield priority areas identified in Map A;
- (b) directing that commercial film or video production facilities are to be connected to reticulated water and wastewater systems (thus ensuring no unnecessary load on the District's aquifers); and
- (c) classifying commercial film or video production activities as activities that are not "noise sensitive" within the meaning of that term in the Canterbury Regional Policy Statement.

The full Proposal may be inspected on the Department of the Prime Minister and Cabinet's website at [website] and copies are available for inspection at Christchurch City Council, Waimakariri District Council and Selwyn District Council service centres and libraries from during normal business hours.

Written comments on the Proposal may be made to the Greater Christchurch Group of the Department of the Prime Minister and Cabinet by no later than [date].

Written comments may be made online at [website].

Or emailed to [email address]

Or posted to [address]

Date [date]

HON [XX], Associate Minister for Greater Christchurch Regeneration.

APPENDIX 3 – DRAFT SECTION 71 NOTICE

GREATER CHRISTCHURCH REGENERATION ACT 2016

Decision on the proposal to exercise section 71 of the Greater Christchurch Regeneration Act 2016 to amend the Christchurch District Plan to provide for the development and operation of commercial film or video production facilities in the Christchurch district

Pursuant to sections 69 of the Greater Christchurch Regeneration Act 2016 (the GCR Act), the Associate Minister for Greater Christchurch Regeneration has approved the Proposal to amend the Christchurch District Plan and the Canterbury Regional Policy Statement to provide for the development and operation of commercial film or video production facilities in the Christchurch district. Amendments are made to the Christchurch District Plan and Canterbury Regional Policy Statement using section 71 of the GCR Act.

The amendments to the Christchurch District Plan include:

- (a) amending the existing definition of “commercial film or video production” to clarify that it does not incorporate any residential component;
- (b) inserting specific recognition for “commercial film or video production” activities within strategic objective 3.3.7;
- (c) inserting specific policies supporting the development of commercial film or video production activities within the commercial and industrial zones;
- (d) making “commercial film or video production” activities permitted in the following zones:
 - (i) Commercial Mixed Use.
 - (ii) Commercial Central City Mixed Use.
 - (iii) Industrial General.
 - (iv) Industrial Heavy.
 - (v) Industrial Park.
 - (vi) Rural Urban Fringe.
 - (vii) Rural Templeton.
- (e) inserting additional permitted activity standards in zones where these are required to ensure appropriate environmental outcomes.

The amendments to the Canterbury Regional Policy Statement include:

- (a) express provision for commercial film or production activities to occur in the Christchurch district both within and outside of the existing urban areas and greenfield priority areas identified in Map A;
- (b) a direction that commercial film or video production facilities are to be connected to reticulated water and wastewater systems (thus ensuring no unnecessary load on the District's aquifers); and
- (c) classifying commercial film or video production activities as activities that are not "noise sensitive" within the meaning of that term in the Canterbury Regional Policy Statement.

The exercise of the section 71 power takes effect on [insert date]

Dated this [insert date]

Hon [XX], Associate Minister for Greater Christchurch Regeneration.