

## Your Comment on the Ryans Road Industrial Area Application

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to [substantive@fasttrack.govt.nz](mailto:substantive@fasttrack.govt.nz).

| 1. Contact Details                                                                                         |                                 |            |               |
|------------------------------------------------------------------------------------------------------------|---------------------------------|------------|---------------|
| Please ensure that you have authority to comment on the application on behalf of those named on this form. |                                 |            |               |
| Organisation name (if relevant)                                                                            | Canterbury Regional Council     |            |               |
| First name                                                                                                 | Tim                             |            |               |
| Last name                                                                                                  | Davie                           |            |               |
| Postal address                                                                                             | PO Box 345<br>Christchurch 8140 |            |               |
| Home phone / Mobile phone                                                                                  |                                 | Work phone | (03) 365 3828 |
| Email (a valid email address enables us to communicate efficiently with you)                               | fasttrack@ecan.govt.nz          |            |               |

| 2. We will email you draft conditions of consent for your comment |                                                      |                          |                                                          |
|-------------------------------------------------------------------|------------------------------------------------------|--------------------------|----------------------------------------------------------|
| <input checked="" type="checkbox"/>                               | I can receive emails and my email address is correct | <input type="checkbox"/> | I cannot receive emails and my postal address is correct |

**Please provide your comments below, include additional pages as needed.**

**Thank you for your comments**

15 September 2025

Chris Fowler

Expert Panel Chair

substantive@fasttrack.govt.nz



Customer Services  
P. 03 353 9007 or 0800 324 636

PO Box 345  
Christchurch 8140

P. 03 365 3828  
F. 03 365 3194  
E. [ecinfo@ecan.govt.nz](mailto:ecinfo@ecan.govt.nz)

[www.ecan.govt.nz](http://www.ecan.govt.nz)

Tēnā koutou,

## **Attention: The Chair and Members of the expert Panel for Ryans Road Industrial Development**

*Carter Group Limited - Fast Track Consent Application – MINUTE 3 OF THE EXPERT PANEL - Canterbury Regional Council comment on the substantive application for the Ryans Road Industrial Development [FTAA-2504-1054] under section 53(2) of the Fast Track Approvals Act 2024.*

Canterbury Regional Council (CRC) has reviewed the substantive application for the Ryans Road Industrial Development Fast Track application and provides the following written comments, made in accordance with section 53(2) of the Fast-Track Approval Act 2024. These comments summarise CRC's overall feedback on the proposal. The technical support for the feedback is contained in Appendices 1 – 5 attached to these comments. CRC's written comment also responds to specific questions from the Panel as set out in Minute 3.

### **Summary**

1. CRC's review of the application has not identified any material matters of contention.
2. The proposal is generally considered to align and be consistent with the relevant objectives and policies and rules set out in the Canterbury Land and Water Regional Plan (LWRP) and the Canterbury Air Regional Plan (CARP).

3. CRC considers that any adverse environmental effects that may arise from the proposal can be appropriately avoided, remedied or mitigated subject to conditions of consent, should the Panel approve the application
4. CRC has been working with the applicant regarding consent conditions in advance of these written comments. There are however further changes still considered necessary. A set of conditions showing those changes are in Appendix 5.
5. The key outstanding matters in the condition set relate to:
  - a. splitting conditions into construction phase and operational phase condition sets, so this has been amended by CRC;
  - b. several conditions are located under the incorrect activity, so these have been inserted into the correct condition set.
  - c. Conditions for culvert installation are considered necessary. Additional information from the applicant on the design and construction methodology for the installation of culverts is necessary to ensure full assessment of effects and complete the conditions.
  - d. Conditions regarding groundwater monitoring are considered necessary and are still to be worked through with CRC and the applicant.
  - e. The applicant will need to provide the relevant plans attached to each conditions set and referred to in the conditions that identifies the location and/or area of the activity.
6. CRC will continue to work with the Applicant on the conditions as we move forward.
7. While acknowledging the Panel will determine the application under the purpose and provisions of the Fast-Track Approvals Act 2024 (FTAA), and will give more weight to the purpose of the FTAA than to the relevant parts of the RMA, clause 17 of the FTAA still requires the Panel to consider the matters listed in the RMA on an individual basis, prior to standing back and conducting an overall weighting.<sup>1</sup> CRC has therefore considered the proposal through a Resource Management Act 1991 (RMA) lens, focusing on parts 2, 3 and 6 as relevant. A full statutory assessment under section 104(1) of the RMA has not been undertaken, rather an exercise undertaken to better understand the scale and nature of potential effects and how

---

<sup>1</sup> Record of Decisions of the Expert Panel under Section 87 of the Fast-track Approvals Act 2024, for the Bledisloe North Wharf and Fergusson North Berth Extension, at [121(b)]

these might measure up. CRC planners consider the proposal aligns with the purpose and principles of the RMA.

## **Background**

8. The substantive application by Carter Group Limited was lodged on 21 March 2025 and deemed complete by the Environmental Protection Authority (EPA) on 15 May 2025. The EPA determined the application complied with section 46(2) of the FTAA 2024.

## Consultation

9. Consultation between CRC and the applicant has been occurring since pre-lodgment of the application. Planning and technical staff have corresponded via meetings and emails throughout the process. Internally, CRC staff have met to discuss the application to provide an opportunity for staff across different relevant disciplines to raise questions, identify issues and provide comments within their respective areas of expertise.
10. A meeting was held with the applicant, Christchurch City Council (CCC) and Selwyn District Council (SDC) to discuss any remaining areas of contention prior to the Panel overview meeting.
11. CRC provided feedback via the Memorandum filed for the purposes of the Panel Convenor and this formed the basis of discussions going forward. The purpose of this feedback was to help identify information gaps and clarify technical matters. This feedback did not include any response to conditions. CRC was provided with additional information, amended management plans and the updated proposed conditions along with Minute 3 of the Panel. Since then, CRC have sought planning and technical advice and have met with the Carter Group to discuss any changes.

## CRC's written comment

12. CRC's written comment has been supported through a series of technical reports. The technical advice is attached as separate appendices 1-5.

## Key Issues

13. CRC agrees that overall, the applicant has appropriately identified and addressed the key issues of the proposal.
14. The key issues that are relevant to CRC are identified as:
  - a. Groundwater Effects
  - b. Land Ecology Effects
  - c. Surface Water Ecology Effects
  - d. Contaminated Land Effects
  - e. Cultural Values Effects
  - f. Policy Planning Effects
15. CRC's review of these key matters has been undertaken across the relevant areas of technical expertise and has been documented in the table of feedback (Appendices 1-5). This table captures the Applicant's general assessment, CRC's assessment and any actions and/or recommended conditions.
16. Based on a review of the relevant technical reports and updated technical reports and supporting assessments, CRC considers that the applicant has adequately responded to the potential effects across the key areas relevant to CRC. Where any additional mitigation is required, CRC has discussed this with the applicant's planner and CRC has proposed changes in the condition set.
17. There are no fundamental remaining disagreements between CRC and the applicant regarding the nature of the issues or the general approach to their mitigation or management. Any fundamental disagreements were resolved through the consultation as set out above.
18. CRC considers that the key issues identified in the application can be appropriately managed and mitigated through robust conditions of consent. These conditions include condition requirements for specific works to be undertaken in accordance with best practice, and by suitably qualified and experienced professionals.

| Applicant's assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | CRC technical assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | CRC Changes required/conditions sought to address CRC's comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Groundwater</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <ul style="list-style-type: none"> <li>As part of this proposal, Carter Group will require resource consent to discharge construction and operational phase stormwater to land. No other discharges of wastewater to land are covered by this application.</li> <li>Roof run off is proposed to be discharged to ground via soak pits, without treatment, and first flush stormwater from hardstand areas on individual lots will be treated before disposal to ground via soak pits. First flush stormwater from roads, footpaths and berms will be treated in infiltration basins prior to discharging to soak pits.</li> <li>The applicant's assessment of groundwater at the proposed development site shows that the proposed site is over the unconfined/semi-confined Groundwater Aquifer System. They have stated that the groundwater is deep with well M35/3176 displaying the highest groundwater level at 14.5m below ground water level (mbgl). The site has uniform layers with silty lenses observed within the sand layer.</li> <li>The applicant did not encounter groundwater at any of the site-specific tests that were carried out and because of the deep</li> </ul> | <ul style="list-style-type: none"> <li>CRC's groundwater specialist, Ms Scott has peer reviewed the application. Her report is in Appendix 1. Her review is summarised below, focussing on areas of agreement and disagreement.</li> <li>CRC's expert agrees with the applicant in that she does not anticipate that stormwater discharges will impact on any downgradient community water supply wells due to their depth.</li> <li>In terms of the shallow down gradient private drinking water wells, CRC's expert agrees with the applicant that these wells could be impacted by stormwater discharges, especially as they are likely to not have treatment systems. She agrees that the chromium and lead concentrations may need to be monitored in nearby domestic wells and that activities listed in Schedule 3 of the LWRP, namely hazardous industries and activities are excluded from the development.</li> <li>There are several areas that CRC's groundwater expert disagrees with. One such area is the estimated depth to groundwater. The applicant has assessed the depth to groundwater to be between 11.5 and 19m below ground level (mBGL). The applicant in</li> </ul> | <ul style="list-style-type: none"> <li>Ms Scott in her peer review report has recommended amended conditions of consent that will address the summarised matters.</li> <li>CRC considers that the groundwater expert's proposed solutions as described in the technical report (Appendix 1) at paragraphs 24-26, should be adopted.</li> <li>CRC has not included wording for these conditions as further consultation is required between CRC and the applicant's experts to finalise wording and a monitoring regime.</li> <li>Once worked through with the applicant, these conditions will be inserted into the S15 discharge permit conditions set (Appendix 5).</li> </ul> |

| Applicant's assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | CRC technical assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | CRC Changes required/conditions sought to address CRC's comment |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| <p>groundwater no visible springs were identified.</p> <ul style="list-style-type: none"> <li>Development of the site and the associated earthworks are proposed to be undertaken in two stages. The maximum earthwork cut depths are proposed to be approximately 6.0m maximum for the infiltration soakage pits with groundwater not expected to be encountered.</li> <li>The effects of the proposed stormwater discharges to ground were assessed by the applicant's consultant and in summary the assessments showed that bacterial contamination, metal concentrations and hydrocarbons indicate that levels are all acceptable. The proposed site does not contain any drinking water protection zones; therefore, no stormwater discharges will affect drinking water supplies.</li> <li>Overall, the applicant states that the proposed stormwater management plan will adequately manage any potential effects on groundwater quality. They also state that the effects on groundwater associated with discharge are considered to be less than minor subject to conditions of consent and an erosion and sediment control plan.</li> </ul> | <p>their assessment has not considered the long-term monitoring well M35/3614 which had one of the highest groundwater levels of 8.12mBGL. Ms Scott has recommended a more detailed survey of land surface and highest groundwater levels in all nearby wells to develop a more detailed depth to groundwater map across the site which may be required if the soak pits are at a depth of 7 mBGL and mounding occurs.</p> <ul style="list-style-type: none"> <li>Depth to groundwater also has an impact on Microbial Risk Assessments (MRA). The applicant's MRA indicates that there will be a 0.04% chance of exceeding the Maximum Acceptable Value (MAV) for <i>E.coli</i> at the closest private domestic well (37 m away) M35/9627. CRC's expert assessment results in a similar figure of 0.05%, however her assessment concludes that the chance of exceeding norovirus MAV is high at 86%. In terms of the <i>E.coli</i> risk, the applicant's assessment relied on a 2m unsaturated zone, which in the CRC's expert's view may not be able to be achieved if the soak pits are 7m deep with the likelihood of additional mounding. If the unsaturated zone reduced to 0m, CRC's assessment showed that the chances of exceeding MAV for <i>E.coli</i> rapidly increases to 84%. During rainfall events this</li> </ul> |                                                                 |

| Applicant's assessment summary | CRC technical assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | CRC Changes required/conditions sought to address CRC's comment |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
|                                | <p>may occur and well M35/9627 alongside other nearby domestic wells may have an increased risk of <i>E.coli</i> contamination.</p> <ul style="list-style-type: none"> <li>• CRC's groundwater expert has further concerns regarding the soak pit depth of 7m BGL because with mounding, the 2m unsaturated zone may not be present. If the treatment relies on the presence of this unsaturated zone, then it may not always be achieved.</li> <li>• The applicant has measured groundwater quality parameters in well M35/1382. CRC's expert has identified that the parameters measured by the applicant are not relevant to the contaminants expected in stormwater discharges. She proposes sampling shallow wells onsite for parameters expected in stormwater would be a better way to establish current groundwater quality and if monitoring is required in the future this initial assessment could be used as a baseline data.</li> <li>• One final issue that CRC's expert has raised in her assessment of the applicant's proposal is that there is no soil monitoring of the infiltration basins for the contaminants proposed in the conditions. Her recommendation is to monitor the soil every 5 years or more frequently if 50% of a set trigger is exceeded.</li> </ul> |                                                                 |



| Applicant's assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | CRC technical assessment summary                                                                                                                                                                                                                                                                                                                              | CRC Changes required/conditions sought to address CRC's comment                                                                                                                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Land Ecology</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                              |
| <b>Lizards</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Lizards</b>                                                                                                                                                                                                                                                                                                                                                | <b>Lizards</b>                                                                                                                                                                                                                                               |
| <ul style="list-style-type: none"> <li>The applicant's Freshwater and Terrestrial ecologists assessed the site for herpetology, freshwater and avifauna.</li> <li>The site was assessed for both native lizard habitat and potential effects on lizards. Detailed assessments were carried out and it was found that Lizards are present on site. Initially the applicant proposed to mitigate any adverse effects on lizards by way of a Lizard Management Plan including methods for salvage, relocation and accidental discovery protocol.</li> <li>Through the process of consultation, Christchurch City Council (CCC), the Department of Conservation (DOC) and CRC technical experts voiced their concerns regarding the applicant's proposed lizard management. The applicant has worked through this issue in detail with DOC and an agreed lizard relocation programme has resulted.</li> </ul> | <ul style="list-style-type: none"> <li>Ms Jack, CRC land ecologist, has provided input to the management of native lizards on-site. Ms Jack is now satisfied with the updated mitigation suggested by DOC and adopted the applicant, and agrees that relocating the lizards to another suitable habitat within the site is appropriate mitigation.</li> </ul> | <ul style="list-style-type: none"> <li>There is now agreement on the appropriate native lizard mitigation which is reflected in the conditions provided by the applicant. Therefore, CRC has no concerns about lizard management within the site.</li> </ul> |
| <b><i>Geranium retrorsum</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b><i>Geranium retrorsum</i></b>                                                                                                                                                                                                                                                                                                                              | <b><i>Geranium retrorsum</i></b>                                                                                                                                                                                                                             |
| <ul style="list-style-type: none"> <li>The applicant did not assess <i>Geranium retrorsum</i> as part of their AEE.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>CRC's land ecologist, Ms Jack commented on <i>Geranium retrorsum</i> being present at the development site. <i>Geranium retrorsum</i> is a threatened and nationally vulnerable plant</li> </ul>                                                                                                                       | <ul style="list-style-type: none"> <li>The applicant has included some conditions regarding <i>Geranium retrorsum</i>. CRC considers an additional condition regarding a maintenance plan is required, to ensure that</li> </ul>                             |

| Applicant's assessment summary                                                                                                                                                                                                                                                                                                                                                                                                           | CRC technical assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | CRC Changes required/conditions sought to address CRC's comment                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>species. Ms Jack has recommended that other than leaving them in-situ, the next best protection would be to translocate them to a suitable habitat.</p> <ul style="list-style-type: none"> <li>• After email correspondence between Mr Arthur, Carter group's consultant ecologist and Ms Jack, it was agreed that it would be appropriate to add in conditions to mitigate the effect on <i>Geranium retrorsum</i>. The applicant's planner has proposed some conditions regarding this. Ms Jack commented on these conditions and asked for one addition, that there is some form of on-going maintenance of these plants rather than solely translocating them and walking away.</li> </ul> | <p>the translocated plants are maintained [in a healthy state]. This condition is set out in the conditions table in Appendix 5, refer to conditions 25 and 26 of the s9- land use consent.</p>                                                                                                                                                                                                                                                                                                 |
| <b>Surface Water Ecology</b>                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <ul style="list-style-type: none"> <li>• The applicant's freshwater ecologist has assessed the freshwater habitat and ecology at the development site. They concluded that there are no natural surface water or wetlands within the site. They do note that the channel flowing along Ryan's Road is an artificial hydrological feature that may contain some limited ecological value and some native fish species habitat.</li> </ul> | <ul style="list-style-type: none"> <li>• CRC's surface water ecologist, Ms. Stevenson, disagreed with the ecological assessment provided by the applicant's consultants for the water race. The applicant's assessment relied entirely on two existing records in the NZ Freshwater Fish database.</li> <li>• CRC's technical expert considered that there is potential for more species to be present within the water race, particularly given the connection to downstream natural</li> </ul>                                                                                                                                                                                                  | <ul style="list-style-type: none"> <li>• CRC is now in agreement on the water race remaining as an open feature with original connections to lower, more natural waterways.</li> <li>• The proposed conditions provided by the applicant are appropriate however CRC considers additional conditions are required in relation to culvert installation. CRC is concerned that without these conditions, effects on ecological habitats and species may not be sufficiently mitigated.</li> </ul> |

| Applicant's assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | CRC technical assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | CRC Changes required/conditions sought to address CRC's comment                                                                                                                                                                                                                                                                                                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Because of these limited ecological values, the applicant initially proposed to pipe the water race 840m.</li> <li>• The applicant's consultant proposed a condition regarding translocation and salvage of any freshwater fish prior to any diversion or construction within the bed of the flowing water race. They deemed that this mitigation is appropriate for the protection of ecological values.</li> <li>• Following feedback from CRC, CCC and SDC, the applicant has updated its proposal so that the water race would no longer be piped and would remain open and be landscaped to become more of a naturalised form and feature of the development.</li> <li>• The conditions were also updated to include a lizard management plan.</li> </ul> | <p>waterways. She concluded that an 840m length of pipe to replace the open water race would be a significant barrier for aquatic species. Therefore, the piping of the water race was not supported.</p> <ul style="list-style-type: none"> <li>• Given this response, the applicant then consulted further with CRC, CCC and SDC. An agreement was reached that the water race would no longer be piped and would remain open and be landscaped to become more of a naturalised form and feature of the development.</li> <li>• The applicant provided an updated water race plan for technical experts to review, CRC's expert is now largely in agreement with the water race proposal as it is a better outcome for the stream habitat and ecological values (Appendix 2). It would, however, be beneficial to receive additional detail from the applicant to understand the design and construction methodology for the installation of culverts to enable a more thorough assessment of potential effects.</li> <li>• In relation to conditions, CRC's expert agrees with the draft conditions provided regarding fish protection measures including the requirement for screens on any pumps used, no stranding of fish in pools or channels, a Fish Management Plan and fish salvage</li> </ul> | <ul style="list-style-type: none"> <li>• With the inclusion of the additional condition regarding culvert installation, that is still to be worked through with the applicant, as set out in Appendix 5 Condition 19 of the S9 – Land Use consent, CRC concludes there are no outstanding areas of disagreement in relation to surface water ecology effects.</li> </ul> |

| Applicant's assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | CRC technical assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | CRC Changes required/conditions sought to address CRC's comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | requirements. She does state that there is a need for a condition to limit the duration of works during culvert installation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Contaminated Land</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <ul style="list-style-type: none"> <li>• The applicant's contaminated land expert carried out a DSI.</li> <li>• They concluded that the historical use of the site has been for agriculture and cropping and that potential HAIL activities such as chemical storage and stockpiling had occurred.</li> <li>• The applicant carried out soil sampling across the site and found two areas in the south-east corner where arsenic exceeded guidelines. They noted that because of this the NES soil applies, and resource consent under this is required.</li> <li>• Because of the presence of contamination, the applicant stated their expert will develop a Remedial Action Plan (RAP) and a Site Validation Report (SVR) will be provided.</li> <li>• Overall, the applicant concluded that the contaminated soil can be managed through conditions.</li> </ul> | <ul style="list-style-type: none"> <li>• CRC's contaminated land expert, Ms. Mirabueno, assessed the AEE and relevant technical reports provided by the applicant (Appendix 3). She agrees with the DSI report and the applicant's recommendations regarding a Remediation Action Plan (RAP) prior to earthworks and a Site Validation Report (SVR) once remediation is completed. Although not required for certification in this FTAA process, CRC would still need to see these reports for compliance purposes.</li> <li>• CRC's expert identified that the applicant's proposed conditions (for the CRC consent) only provided for the discovery of contaminated soils. Contamination matters were only addressed in the NES regulations, implemented by CCC.</li> <li>• As well as conditions regarding the accidental discovery of contaminated soils there is also a requirement for contaminated land to be managed through the CRC consents.</li> <li>• CRC's expert also notes that if any operational stormwater discharges are</li> </ul> | <ul style="list-style-type: none"> <li>• CRC considers the RAP and SVR should be provided to CRC and that any technical guidelines are followed to ensure appropriate handling and disposal of any contaminated land.</li> <li>• Any contaminated soil removed should be taken to a site whose waste acceptance criteria would be met.</li> <li>• The issues identified by CRC's Contaminated Land expert can be addressed through the proposed changes to conditions as set out in Paragraph 19 of Appendix 3 and also included in the proposed conditions table in Appendix 5. Refer to condition 4, 6-12, 16-18, 21 and 28 in the S9- Land Use consent and conditions 2-10 and 18-19 in the s15- Discharge (construction phase) consent.</li> </ul> |

| Applicant's assessment summary                                                                                                                                     | CRC technical assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | CRC Changes required/conditions sought to address CRC's comment                                                                                                                                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                    | <p>proposed where the HAIL activity occurred, the soils also need to be remediated and validated to meet guidelines.</p> <ul style="list-style-type: none"> <li>• CRC's expert also states that testing of water prior to discharge should include, not only TSS as set out by the applicant, but should also include other relevant contaminants from the area of contamination.</li> <li>• Overall CRC's expert believes that these risks can be mitigated through appropriate conditions.</li> </ul> |                                                                                                                                                                                                                                    |
| <b>Cultural values</b>                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                    |
| <ul style="list-style-type: none"> <li>• The applicant has consulted with Te Ngāi Tūāhuriri Rūnanga and Te Taumutu Rūnanga.</li> </ul>                             | <ul style="list-style-type: none"> <li>• CRC have lodged a Papatipu Rūnanga Environmental Entities (PREE) request with Mahaanui Kurataiao Ltd (MKT) for both Te Ngāi Tūāhuriri Rūnanga and Te Taumutu Rūnanga and have been in email communication.</li> <li>• CRC offered to provide technical support to MKT if they felt they required it. At the time of writing this s53 comment, MKT have not reached out for any further support from CRC.</li> </ul>                                            | <ul style="list-style-type: none"> <li>• Both Te Ngāi Tūāhuriri Rūnanga and Te Taumutu Rūnanga have been asked to provide s53 comments to the Panel. CRC cannot provide any cultural comments on behalf of the Rūnanga.</li> </ul> |
| <b>Policy Planning</b>                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                    |
| <ul style="list-style-type: none"> <li>• The applicant has assessed the National Policy Statement for Freshwater Management 2020 (NPS-FM), the National</li> </ul> | <ul style="list-style-type: none"> <li>• CRC's expert policy planner, Ms. Tutty, has provided an assessment of the relevant NPS</li> </ul>                                                                                                                                                                                                                                                                                                                                                              | <ul style="list-style-type: none"> <li>• Relying on Ms. Tutty's advice, CRC considers that the applicant's review of the NPS-FM, and the NPS-IB is not comprehensive</li> </ul>                                                    |

| Applicant's assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | CRC technical assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | CRC Changes required/conditions sought to address CRC's comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Policy Statement for Indigenous Biodiversity 2023 (NPS-IB), the National Policy Statement for Highly Productive Land 2022 (NPS-HPL) and the National Policy Statement for Urban Development 202 (NPS-UD).</p> <ul style="list-style-type: none"> <li>• Overall, the applicant has concluded that the proposal is consistent with these planning documents.</li> <li>• The applicant has also assessed the Canterbury Regional Policy Statement 2013 (RPS), the Land and Water Regional Plan (LWRP) and the Canterbury Air Plan (CARP).</li> <li>• The applicant's planning expert found the proposal to be consistent with the overall objectives and policies.</li> <li>• The applicant has assessed the Mahaanui Iwi Management Plan and found the proposal to be generally consistent with its provisions.</li> <li>• The Canterbury Land Transport Strategy was also assessed, and the expert has concluded that the site has good connectivity to the local and strategic transport network.</li> <li>• Overall, the applicant's expert concluded that there are no conflicts with provisions that reach a sufficiently significant adverse impact under s85 of the FTAA.</li> </ul> | <p>and NES regulations and the RPS (Appendix 4).</p> <ul style="list-style-type: none"> <li>• She notes that only a brief assessment has been carried out by the applicant on the requirements of the NPS-FM, the NPS-IB and the NPS-HPL.</li> <li>• The applicant provided a full assessment of the proposal against the NPS-UD and CRC's policy expert notes that the conclusions drawn are dependent on whether the Panel deems the proposed site to be within an urban environment.</li> <li>• In terms of the RPS, CRC's expert agrees that the main issues associated with the proposal relate to development outside of identified areas, loss of primary production and versatile soils, effects on infrastructure and managing contaminated land at the site.</li> <li>• CRC's expert agrees with the applicant that the proposed consent conditions are designed to allow the safe development of the Christchurch International Airport and although the area has not been identified as a priority area for development, and thus is not entirely consistent with the RPS, it is able to be appropriately serviced and is on the fringe of the urban area.</li> <li>• The benefits as identified by CRC's expert is that development will enable people and</li> </ul> | <p>enough, and a more thorough review is required to justify the conclusion that the proposal is consistent with these higher order planning documents.</p> <ul style="list-style-type: none"> <li>• In relation to the RPS, generally, threatened species management (Geranium and lizards), contaminated land and effects on Christchurch Airport can be managed through consent conditions.</li> <li>• CRCs' planning expert has recommended a Management Plan for the water race as set out in Table 2 of Appendix 4. This Management Plan is captured in Condition 6 of the s9- Land Use proposed consent conditions.</li> </ul> |

| Applicant's assessment summary | CRC technical assessment summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | CRC Changes required/conditions sought to address CRC's comment |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
|                                | <p>communities to provide for their economic well-being (Objective 5.2.1 RPS). The development is proposed to occur close to an existing urban area and transport.</p> <ul style="list-style-type: none"> <li>• CRC's expert considers that additional information is required regarding the planting and restoration of the waterway to determine if the water way is maintained or enhanced.</li> <li>• CRC's consents expert agrees that the proposal is consistent with the objectives and policies of the LWRP and the CARP and agrees with the applicant's assessment. For this reason and because of the consensus of views, CRC has not set this out in its written comments.</li> </ul> |                                                                 |

## **Regional benefits**

19. The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.
20. While ultimately a matter for the Panel, the application has described the regional and national benefits of the industrial development at Ryan's Road.
21. The applicant's economic consultant, Market Economics, has assessed the regional benefits of the proposal. It is expected to deliver significant regional economic benefits in both the construction and operational phases, estimated as a one-off \$574 million in GDP and 2,205 FTE jobs. The operational phase is expected to contribute \$330 million annually to the Region with 2,770 FTE jobs.
22. Market Economics also expects that the development will generate positive national benefits, however, recognises that the proposed development at Ryan's Road is not considered significant at a national scale.
23. It has been identified by Market Economics that there will be limited economic costs associated with the loss of rural land and rural production.
24. The benefits of the industrial development at Ryan's Road, as set out by Market Economics, are not being questioned by CRC. An economic assessment was not undertaken by CRC.
25. CRC does note that CCC sought advice<sup>2</sup> in the form of a peer review of the applicant's economic assessment. The main area of disagreement raised is that the CCC's experts identified that a full cost-benefit analysis was not completed by the applicant.

---

<sup>2</sup> Ryans Road Fast track Economic review, prepared for Christchurch City Council 25 August 2025 by Formative



## Panel Questions for the CRC

26. The Panel has asked several questions that they would like CRC to provide specific responses to. These questions along with CRC responses are set out below.

**Question 1:** *Comment on whether the draft RPS plan changes associated with soils mapping is relevant to the proposal.*

**Answer 1:** the draft Regional Policy Statement (and any associated mapping) has no legal status including through any of Schedule 5 of the FTAA and should not be considered when assessing the proposal. It has not been notified, so is not a proposed plan.

**Question 2:** *Comment on the relevance of the NPS-HPL to the application, to the extent that ECan considers its comments are necessary*

**Answer 2:** CRC sought advice from Simpson Grierson regarding CRC's involvement in NPS-HPL related issues in a Fast-track consenting context.

In summary, for Ryans Road, the Canterbury Regional Policy Statement has not yet been updated with mapping of HPL, which is the key direction given in the NPS-HPL to regional councils. The NPS-HPL will generally not be relevant for regional consenting consents because the NPS provisions are focused on restricting urban and rural lifestyle zoning, subdivisions and land use on HPL. It is not directly within CRC's functions for CRC to comment on the HPL status of the land under the transitional definition, or whether an exemption pathway is available. CRC considers that it is for CCC, who is also best placed, to advise the Panel on the question of the nearest equivalent zone.

**Question 3:** *Comment on Appendix 27 Assessment of Groundwater Effects and any potential impacts of the proposal on groundwater recharge.*

**Answer 3:** Appendix 27 does not quantify the change on recharge volume. Even though the applicant didn't assess this there will likely be a slight increase that has not been quantified.

Some of the rainfall that normally falls on farmed soils is lost due to evaporation or plant uptake and some drains through and becomes recharge. If a farmed area is converted to an industrial area, then new sealed surfaces are created. Sealed areas will generate more runoff and less evaporation and plant uptake. This can lead to higher volumes of water becoming recharge to groundwater. The groundwater recharge is concentrated over a smaller area, and it occurs in soak pits and infiltration basins rather than more evenly over the whole property. Recharge may occur more frequently than under farmed land use.

Appendix 27 does look at mounding. It considered a 24 hour rainfall event and average annual mounding. The applicant's expert calculated a total combined annual mounding to be 0.79m. If this represents an increase in average groundwater level across the whole site then maybe this could be used to work out an increase in recharge. Given the depth to groundwater, surface flooding is not expected to be an issue.

The nature of contaminants also changes. Contaminants from farming are from nutrient losses (macro and micro nutrients) and pathogens. There may also be some pesticides and other farming chemicals that leach to groundwater. The stormwater in the proposed development may contain higher concentrations of metals and hydrocarbons than the farmed land use. There may be areas near the soak pits where pathogens are higher. There may also be unknown contaminants that may enter from the specific industrial activities that will occur on each new lot.

This may impact on nearby drinking water wells. Due to uncertainty in eventual use of each of the sites there is also potential for activities to introduce other contaminants into the stormwater that have not been considered in the applicant's assessment.

**Question 4:** *The appropriateness of the proposed naturalisation of the water race and any additional matters to be addressed, including construction issues.*

**Answer 4:** The water race has been addressed in Table 1 above, and these comments are provided alongside those earlier comments.

CRC has not received a detailed design for the 'naturalisation' of the water race but is supportive of the proposal to retain the watercourse as an open channel rather than piping it for a significant distance (~840 metres) as this is a better outcome for stream habitat and ecological values. A series of shorter culverts rather than one long pipe will allow for the retention and potential improvement of waterway and riparian habitat along Ryans Road and avoid creation of a barrier to fish passage. It would be useful to see further detail of the proposed design to understand the risks associated with the works in and around the waterway, e.g. culvert design, as well as the potential improvement in waterway values that could be gained by instream and riparian enhancement. Details of construction methodology for the culverts is also lacking to determine whether proposed mitigation is sufficient to manage potential effects, e.g. sediment discharge and fish disturbance.

**Question 5:** *Whether ECan should have a certification role in the various management plans required by the proposed consent conditions, and if so, to which plans certification should apply.*

**Answer 5:** CRC's position is that certification of documents such as management plans by CRC is not appropriate as CRC is not the decision maker on Fast Track applications.

CRC's position is that any conditions relating to management plans should set out that they are produced by a suitably qualified person and are submitted to CRC (in order for them to be used for future monitoring / compliance).

## **CRC's Concluding Comments**

CRC have reviewed the substantive application and technical appendices for the proposed Ryans Road Development by Carter Group. CRC's view is that there are no fundamental issues that cannot be resolved through CRC's proposed consent conditions and continuing to work with the applicant as we move forward.

A handwritten signature in black ink, appearing to read 'Tim Davie', with a stylized, cursive script.

Tim Davie  
Acting Director Operations

## **Appendices- as separate attachments**

**Appendix 1:** Technical Advice- Groundwater- Ms. Marta Scott

**Appendix 2-** Technical Advice- Surface Water Ecology- Ms. Michele Stevenson

**Appendix 3-** Technical Advice- Contaminated Land- Ms. Hannah Mirabueno

**Appendix 4-** Technical Advice- Policy Planning- Ms. Rachel Tutty

**Appendix 5-** CRC's Proposed Conditions Table