

2 July 2026

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Kia ora Mujahid Musa,

CANTERBURY REGIONAL COUNCIL (CRC) COMMENTS ON DRAFT CONDITIONS

Thank you for the opportunity to provide comment on the draft conditions released by the Panel determining the State Highway 1 North Canterbury- Woodend Bypass Project (Belfast to Pegasus)-FTAA-2512-1157 application by New Zealand Transport Authority (NZTA) under the Fast-track Approvals Act 2024.

As directed by Minute 10, please see the attached document which tracks any changes recommended by CRC on the draft conditions. You will note that 'comments' have been included where appropriate to support the recommended changes.

CRC has not worked on these comments with NZTA due to the limited timeframe to respond to the Panel.

Ngā mihi,

A handwritten signature in black ink, appearing to read "Dwayne Daly".

Dwayne Daly
Principal Consents Planner

IN-CONFIDENCE

ATTACHMENT 1: TRACKED CHANGES TO DRAFT CRC CONDITIONS

CRC have added track changes for any suggested changes and have provided reasons for the amendments sought.

Condition Number	Panel Condition	CRC reasons for amendments sought
C1.8	Upon completion or abandonment of any earthworks on the Site all areas of bare earth shall be permanently stabilised using grass or other landscaping to minimise erosion.	C1.8 and C1.12 as written are very similar. CRC suggests keeping C1.12 and deleting C1.8 as C1.12 aligns with the ten days set out in C1.10.
C1.12	Within ten working days of completion or abandonment of any earthworks on the Site all areas of bare earth shall be permanently stabilised using grass or other landscaping to minimise erosion.	
C3.6	Prior to the first exercise of this consent, the consent holder shall install fish screens on all pumps used to take water from the Quarry Lakes, in general accordance with Schedule 2 of the <u>Canterbury Land and Water Regional Plan-CLWRP</u> .	Use CLWRP rather than the full wording to keep consistent throughout the conditions.
C3.17	All Construction Works involving damming, diversion or surface water takes (over pumping) activities shall be undertaken in accordance with the:	The addition of these words to C3.17 would make this condition consistent with conditions C3.18 and C3.19.

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Condition Number	Panel Condition	CRC reasons for amendments sought
	▲ (a) EMP prepared and certified in accordance with conditions MP.1-MP.5 and MP.7-MP.8 in Schedule 2 of this resource consent. ▲ (b) ESCMP prepared and certified in accordance with conditions MP.1-MP.5 and MP.10 in Schedule 2 of this resource consent	
▲ O3.5	▲ The discharge into the receiving water must not, after reasonable mixing (as defined in Schedule 5 of the Canterbury Land and Water Regional Plan CLWRP), cause conspicuous oil or grease films, scums, foams, or floatable materials in the receiving water. ▲	▲ Use CLWRP rather than the full wording to keep consistent throughout the conditions.
▲ Table 1: Management plans to be certified by CRC	Remedial Action Plan (RAP) ▲	A typo was picked up here. The closed bracket needs to be added to RAP.
▲ Construction Air Quality Management Plan MP.9	The purpose of the CAQMP is to detail measures to minimise the effects of the discharge of dust from outdoor storage of bulk solid materials beyond the site boundary and ensure that any discharges of dust beyond the site boundary are not offensive or objectionable. The CAQMP must include: (a) A description of the outdoor storage of bulk solid materials as it relates to potential effects on air quality (including dust sources associated with this activity);	▲ CRC would find it very helpful if the Applicant could have methods to record and respond to air quality complaints from the public. This continues to be an issue for CRC over a number of consents and is generally a condition we have in air quality management plans. ▲

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	(b) A map indicating the location where stockpiling of bulk solid material may occur and the following adjacent activities: (i) any residential areas or zones (as defined in a district plan) within 250 metres; and (ii) any Sensitive Air Quality Receptor Activity (SAQRA) within 100 metres; (c) Measures to minimise dust emissions from outdoor storage of bulk solid materials, which must include: (i) Siting of stockpiles to maximise separation from SAQRAs; (ii) Minimising wind exposure of stockpiles; (iii) Use of water application (including via hoses, or sprinklers) in dry and windy conditions or temporary surface stabilising agents; (d) At minimum, the measures described in accordance with clause (c) must include the following requirements: (i) Heights of outdoor, uncovered stockpiles are to be minimised as far as practicable to reduce wind entrainment and must be no greater than 3 metres in	

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	height within 250 metres of a residential area or zone (as defined in a district plan) or within 100 metres of any other SAQRA and no greater than 5 metres in height at other locations; (ii) Water is to be applied to uncovered surfaces of stockpiles located within 250 metres of a residential area or zone (as defined in a district plan) or within 100 metres of any other SAQRA to suppress dust during dry weather periods (where less than 2 mm of rainfall has occurred in the preceding 72 hours). An adequate supply of water and equipment is to be maintained on site to fulfil this requirement at all times; (iii) Screens or barriers are to be erected around outdoor, uncovered stockpiles located within 250 metres of a residential area or zone (as defined in a district plan) or within 100 metres of any other SAQRA to reduce wind exposure; (iv) Stockpiles inactive for longer than three months are to be covered or stabilised (such as through hydroseeding or application of temporary stabilising agents); (e) Methods for visual monitoring of dust emissions from stockpiles during construction, including specification of	

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	triggers for investigation and mitigation response actions; (f) Contingency methods to address identified and verified effects of dust emissions from stockpiles on SAQRAs; (g) An explanation as to how any adverse effects on sites that are sensitive to Ngāi Tahu, such as statutory acknowledgement areas, silent file areas or wāhi tapu or wāhi taonga are to be managed; (h) The roles and responsibilities of staff and contractors for dust management; <u>(i) A method for recording and responding to complaints from the public in accordance with Condition C4.13</u>	

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	(j) Where not already addressed by preceding clauses, the relevant requirements of Schedule 2 of the Canterbury Air Regional Plan.	
MP.10	The purpose of the ESCP-ESCMP is to identify the erosion and sediment control (ESC) principles, procedures and practices that will be implemented to minimise sediment discharge from Construction Works beyond the site.	Added M into acronym for naming consistency.
MP.13	The purpose of the RAP is to document a remedial strategy for the contamination requiring active remediation in accordance with MP.12 (j). The RAP must include: (a) Remedial objectives and targets; (b) Remedial methodology; (c) Any additional controls required to manage contamination discharges during remediation works (beyond those controls already required by the CSMP); (d) Any validation sampling or methodologies that will be undertaken to demonstrate successful completion of the remedial works.	Add MP before 12 (j)
Schedule 4 CM.1	If Canterbury mudfish are detected during Construction Works within the Potential Mudfish Habitat WC_W6_NPSFM then Construction Works must cease	Canterbury mudfish may be found elsewhere at the site than just WC_W6_NPSFM.

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Condition Number	Panel Condition	CRC reasons for amendments sought
	until a Canterbury Mudfish Management Plan (CMMP) has been certified by CRC in accordance with Condition CM.7. This condition does not restrict Construction Works in other parts of the Project beyond <u>any individual wetland where Canterbury Mudfish are found, the Potential Mudfish Habitat WC_W6_NPSFM,</u>	
Schedule 4 CM.5	The CMMP shall include: (a) the location and extent of occupied Canterbury mudfish habitat within potential Mudfish Habitat WC_W6_NPSFM, to which the CMMP applies; (b) measures to avoid or minimise effects on Canterbury mudfish; (c) salvage and handling methods; (d) relocation methods, including timing, fish capture, temporary holding, transport and release procedures; (e) the location of proposed recipient site or sites, including confirmation by a suitably qualified and experienced freshwater ecologist that the site could potentially support Canterbury mudfish; (f) any habitat restoration, enhancement, preparation, or fencing required at the recipient site or sites prior to relocation;	Canterbury mudfish may be found elsewhere at the site than just WC_W6_NPSFM.

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	(g) post-relocation monitoring methods for a period of two years following relocation, with the purpose of assessing whether Canterbury mudfish establishment at the recipient site has been demonstrated; (h) performance measures for determining whether Canterbury mudfish establishment at the recipient site has been demonstrated; (i) reporting requirements to CRC and DOC, including reporting of capture and relocation data, habitat restoration or enhancement works, monitoring results and the outcome of the two-year monitoring period; and (j) further Canterbury mudfish compensation measures to be implemented if: (i) A suitable site for Canterbury mudfish relocation cannot be identified, or (ii) Canterbury mudfish establishment at the recipient site has not been demonstrated after two years of post-relocation monitoring; (k) The compensation measures must directly relate to Canterbury mudfish and may include research, recovery, survey, monitoring or habitat restoration.	
Schedule 4 CM.7	At least 20 Working Days prior to the recommencement of Construction Works within the area identified in the	This should include CM.2 as this has the purpose that the plan should achieve.

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	CMMP, the CMMP shall be provided to CRC for certification that it is in accordance with requirements of Conditions CM.2 to CM.3 CM.6 .	
Schedule 4 CM.8	The certified CMMP shall be implemented and complied with for the duration of Construction Works within the Potential Mudfish Habitat WC_W6_NPSFM , and for the duration of any post-relocation monitoring, habitat maintenance, reporting, or further compensation measures required by the CMMP.	Canterbury mudfish may be found elsewhere at the site other than just WC_W6_NPSFM.
Schedule 3 EM.3 & EM.4	(a) Except where modified by Condition EM.4, offset and compensation measures shall be carried out in accordance with the Ecology Offset Plan (Volume 4E of the Application) attached to and forming part of this resource consent. (b) The offsetting areas must include at least 2.6 ha of wetland area in the Southern Remnant Lake, 0.19 ha of stream bed and 2.5 ha of associated riparian planting along McIntosh Drain, and 6 ha of lizard habitat throughout the Project site area. <u>For the avoidance of doubt, this offset area cannot be reduced during the recalculation process under EM.4.</u>	It is unclear if the minimum area identified in (b) can be modified by the recalculation in EM.4 – If it can't be reduced then proposed track changes are recommended.

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