

Appendix 4: s53(2)(a) Fast Track Approvals Act 2024, Technical Advice- Policy Planning

Date	1 September 2025
To	Joanne Mitten, Principal Consents Planner, Environment Canterbury
From	Rachel Tutty, Principal Planner, Environment Canterbury
Project advice provided for	Ryans Road Industrial Development
Documents referred to	Ryans Rd - assessment against RPS.docx Ryans Road - response to draft RPS question.docx
Qualifications	My qualifications include a Bachelor of Science from the University of Canterbury, and a Postgraduate Certificate in Environmental Management (with Distinction) from Lincoln University. I have worked in planning since 2020 and have experience in plan making and policy analysis. This experience includes drafting submissions on national legislation, district council plan changes and district council notified consents. It also includes preparing and presenting evidence on Plan Changes to the Mackenzie District Plan, and on notified consents.
Code of Conduct	I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This technical report has been prepared in accordance with that Code. In particular, unless I state otherwise, the opinions I express are within my area of expertise, and I have not omitted to consider material facts that might alter or detract from the opinions that I express.

Executive summary/overview

1. The Panel posed a question relating to the relevance of the draft Regional Policy Statement. My response to that question is that the draft Regional Policy Statement (and any associated mapping) has no legal status and should not be considered when making an assessment. It has not been tested through the RMA Schedule 1 submissions and hearing process.
2. Assessment of the proposed activity against the operative Canterbury Regional Policy Statement (RPS) (document attached) shows that the main issues associated with the proposal relate to
 - Development outside identified areas
 - Loss of primary production and versatile soils
 - Effects on infrastructure
 - Managing contaminated land at the site
3. Most of the issues identified could be addressed through consent conditions, however the loss of the availability of versatile soils for primary production cannot be addressed in

that way. This issue is separate from considerations relating to whether the site should be considered to be Highly productive Land under the NPS-HPL.

4. More information about the proposed planting and restoration of the water race is needed to determine compliance with RPS objectives and policies. There is also disagreement between experts as to whether there is already sufficient land identified for industrial development within Christchurch City.

Agreement with the Applicant

5. Christchurch International Airport is regionally significant infrastructure. The proposed consent conditions are designed to allow the continued safe, efficient and effective use of that airport.
6. Although the site has not been identified as a priority area for development, it is able to be appropriately serviced with reticulated drinking water and wastewater, as well as electricity and telecommunications. Stormwater consent conditions allow for the appropriate disposal of both construction-phase and operational-phase stormwater.
7. Assessments provided by the Applicant indicate that Community Drinking Water supplies are unlikely to be contaminated by activities taking place in the proposed development. The proposed consent conditions have been designed to minimise risk to those supplies.
8. Consent conditions have been developed to manage dust at the site.
9. Contaminated land has been identified at the South-East corner of the site.
10. The proposed consent conditions seek to protect people and the environment from adverse effects of that contaminated land.
11. Proposed consent conditions cover spills of fuel or any other hazardous substances within the site.

Benefits of the project

12. The development will help to enable people and communities to provide for their economic well-being. That is consistent with Objective 5.2.1 of the RPS.
13. The development is taking place close to an existing urban area, with its associated workforce availability, and is adjacent to key transport infrastructure (Christchurch International Airport and State Highway 1).

Outstanding areas of contention and significance of these

Outstanding areas of contention

14. More information is needed regarding the proposed planting and restoration of the water race that adjoins the site in order to determine whether the overall quality of the natural environment will be maintained or enhanced.
15. Assessments of the anticipated demand for industrial land in the Christchurch City area disagree. As a result of that disagreement, it is not possible to determine whether the proposal is consistent with some RPS provisions.
16. The site contains versatile soils that are currently used for rural production activities. Productive use of those soils will be foreclosed by the proposed use of the site

Table 2: Solutions

Issue	Solution	Condition wording	Consideration against FTAA
More information is needed regarding the proposed planting and restoration of the water race that adjoins the site. The water race feeds into streams that run through Christchurch City and as such maintenance of its health is important.	Applicant to provide a Management Plan for the water race		
Development outside identified areas The site has not been identified as a greenfield priority area for business in the RPS. A determination should be made as to whether	Panel to determine whether the site is highly productive land, and whether there is sufficient industrial land already available within Christchurch City.	These issues are not able to be resolved through consent conditions	

the site is highly productive land. There is also disagreement between experts as to whether there is already sufficient land identified for industrial development within Christchurch City.			
Loss of primary production and versatile soils The site is currently used for rural activities, and the proposed development would foreclose the ability to continue those activities on the site. The site meets the definition of versatile soils in the RPS.	Panel to determine whether the benefits of the proposal outweigh the loss of productive use of versatile soils at the site.	This issue is not able to be resolved through consent conditions.	

FAST TRACK – RMA254537 - Ryans Road Industrial Development - CRC analysis of the Higher Order Documents

Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F)

The applicant is correct in stating that the water race does not meet the definition of a river under these regulations because it is an artificial watercourse. There are also no identified wetlands at the site. As such, these regulations do not apply to the proposal.

National Policy Statement for Freshwater Management (NPS-FM)

A very brief assessment has been carried out on the requirements of the NPS-FM. The NPS-FM applies to all freshwater (except groundwater) and as such analysis of its requirements is required. The following should be addressed:

1. Full Policy Analysis:
 - o An explanation of how the proposal aligns with each relevant policy
2. The water race at the site feeds into freshwater streams that flow through Christchurch City. It is important that its values are protected in order to be consistent with the higher order planning documents

Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect human Health) Regulations 2011 (NES-CS)

A full policy analysis has been carried out by the applicant.

Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007 (NES-DW)

The applicant is correct that the activity will not have the potential to affect a registered drinking supply so no analysis against these standards is needed.

National Policy Statement for Indigenous Biodiversity (NPS-IB)

A very brief assessment has been carried out on the requirements of the NPS-IB. The following should be addressed:

1. Full Policy Analysis:
 - o An explanation of how the proposal aligns with each relevant policy

Canterbury Regional Policy Statement (CRPS)

The assessment of the proposal against the CRPS is incomplete. The following areas require further information:

Chapter 9 Ecosystems and Indigenous Biodiversity

There is no assessment of this chapter. The ecological assessment has concluded that at least one threatened species is present at the site. An assessment of Chapter 9 should be included.

Chapter 14 Air Quality

The assessment does not address this chapter. Given that earthworks on the site will generate dust, an assessment of Chapter 14 should be undertaken, with reference to the dust management measures outlined in the application. Ongoing air quality impacts from industrial activity on the site should also be addressed.

Chapter 18 Hazardous Substances

There is no assessment of this chapter. Policy 18.2.2 new contamination of land, is relevant to the application as the HAIL sites within the proposal pose a risk of new contamination of land if adequate remediation is not undertaken. An assessment of CRPS chapter 18 should therefore be undertaken.

Chapter 19 Waste Minimisation and Management

The planning assessment notes that Chapter 19 is of limited relevance but provides no explanation to support this conclusion. Given that the applicant has chosen to include this chapter in the assessment, it should be supported with an explanation as to why the provisions are considered to have limited applicability.

Ryans Road industrial development (fast track) - Consistency with Canterbury Regional Policy Statement (CRPS)

Main issues identified:

- Out of sequence development – the site is not part of a Future Development Area or greenfield priority area in Map A in the RPS.
- There is disagreement between assessors as to whether there is sufficient industrial land available in Christchurch City to meet demand without the development of this site.
- Loss of primary production and versatile soils as defined by the RPS - this cannot be managed through consent conditions. This is independent of the determination that will need to be made by the Panel as to whether the site consists of highly productive land for the purposes of the NPS-HPL.
- Threatened species – geranium being managed through consent conditions, lizards being managed through the Lizard Management Plan.
- Water race – more information is needed in regards to the proposed planting and restoration of the water race to determine compliance with RPS objectives and policies
- Construction-phase stormwater – need to determine whether any will be discharged into a waterbody to determine compliance with RPS objectives and policies.
- Effects on Christchurch International Airport - these effects are identified and managed through the proposed consent conditions.

- Effects on other infrastructure - there is a need for more information regarding effects on the transport network to determine compliance with RPS objectives and policies.
- Contaminated land – consent conditions manage the effects.

Assessment against relevant RPS provisions:

Relevant definitions in the CRPS:

Definition	Relevance to the Ryans Road proposal
Biodiversity <i>Has the same meaning as biological diversity as defined by Section 2 of the Resource Management Act:</i> <i>Means the variability among living organisms, and the ecological complexes of which they are a part, including diversity within species, between species, and of ecosystems</i>	
Community-scale irrigation, stockwater and rural drainage infrastructure <i>Any community scale intake, canal, pipe, drain, pumps and overflow network, including associated structures, necessary to convey and store water for enhancing primary productivity and that serves multiple properties and is centrally administered.</i>	The water race along the boundary of the site meets the definition of community-scale irrigation, stockwater and rural drainage infrastructure.
Critical Infrastructure <i>Infrastructure necessary to provide services which, if interrupted, would have a serious effect on the communities within the Region or a wider population, and which would require immediate reinstatement. This includes any structures that support, protect or form part of critical infrastructure. Critical infrastructure includes:</i> <i>1. regionally significant airports</i> <i>2. regionally significant ports</i>	Christchurch International Airport meets the definition of critical infrastructure. The Christchurch sewage disposal system, to which the development would connect, also meets the definition of critical infrastructure.

3. <i>gas storage and distribution facilities</i> 4. <i>electricity substations, networks, and distribution installations, including the electricity distribution network</i> 5. <i>supply and treatment of water for public supply</i> 6. <i>storm water and sewage disposal systems</i> 7. <i>telecommunications installations and networks</i> 8. <i>strategic road and rail networks (as defined in the Regional Land Transport Strategy)</i> 9. <i>petroleum storage and supply facilities</i> 10. <i>public healthcare institutions including hospitals and medical centres</i> 11. <i>fire stations, police stations, ambulance stations, emergency coordination facilities.</i>	Strategic road networks are no longer defined in the Canterbury Regional Land Transport Plan. However, State Highway 1, which runs very close to the development, must be seen as critical infrastructure.
Ecological health <i>Refers to the condition of an ecosystem and its ability to function normally supporting the life-forms and processes naturally associated with it.</i>	
Ecosystem <i>A system of interacting terrestrial or aquatic living organisms within their natural and physical environment. ...</i>	
Electricity transmission network <i>The electricity transmission network/ electricity transmission activities/ assets/ infrastructure/ resources/ system, all being part of the national grid of transmission lines and cables (aerial, underground and undersea, including the high-voltage direct current link), stations and sub-stations and other works used to connect grid injection points and grid exit points to convey electricity throughout the North and South Islands of New Zealand.</i>	
Essential Structures <i>Structures that support or form part of:</i> 1. <i>a maritime, road or rail transport network or service;</i>	The road transport network including State Highway 1 is an essential structure, as is the sewerage system.

2. water supply, including irrigation infrastructure; 3. a telecommunications or radio-communication network; 4. an energy generation, supply or transmission facility or network; 5. a flood-protection work or facility; 6. water containment, flow or diversion infrastructure; 7. a water level or flow-measurement facility; 8. a drainage or sewerage system; or 9. the infrastructure forming parts of other network utilities. This includes any structures that support essential infrastructure.	
greater Christchurch <i>greater Christchurch means the districts of the Christchurch City Council, the Selwyn District Council, and the Waimakariri District Council, and includes the coastal marine area adjacent to these districts, as defined in the Canterbury Earthquake Recovery Act</i>	The site is within greater Christchurch
Hazardous activity or industry <i>An activity or industry that appears on the Hazardous Activity and Industry List (HAIL) 2004. The HAIL is published as Schedule A in the Contaminated Land Management Guidelines - Ministry for the Environment (2004) updated September 2007.</i>	A HAIL site has been identified on the site.
Primary production <i>The production (but not processing) of primary products including agricultural, horticultural, pastoral, aquacultural, and forestry products and includes the use of land and auxiliary buildings for these purposes.</i>	The site is currently used for primary production.
Regionally significant infrastructure <i>Regionally significant infrastructure is:</i> ... 8. Sewage collection, treatment and disposal networks ...	The wastewater system and the water race are regionally significant infrastructure.

11. Established community-scale irrigation and stockwater infrastructure ... 14. Infrastructure defined as ‘strategic infrastructure’ in this regional policy statement. Note: For the avoidance of doubt, this infrastructure is also referred to as ‘infrastructure that is regionally significant’.	
Threatened species A species facing a very high risk of extinction in the wild and includes nationally critical, nationally endangered and nationally vulnerable species as identified in the New Zealand threat Classification Systems lists.	One threatened – nationally vulnerable species (<i>Geranium retorsum</i>) has been identified at the site. Lizards may also be present on site. These need to be identified and will be managed through a Lizard Management Plan
Versatile soil Land classified as Land Use capability I or II in the New Zealand Land resource Inventory.	The land covered by the proposal is Land Use capability II and is versatile soil.

Objective and Policy Assessment:

Objective/ Policy	Assessment
Chapter 5 – Land Use and Infrastructure	
Objective 5.2.1 Location, Design and Function of Development (Entire Region) Development is located and designed so that it functions in a way that: 1. achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region’s growth; and	1. The development is taking place close to an existing urban area. 2. The development will help to enable people and communities to provide for their economic well-being a. More information is needed regarding the proposed planting and restoration of the water race that adjoins the site in order to determine whether the overall quality of the natural environment will be maintained or enhanced.

2. enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which: a. maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values; b. encourages sustainable economic development by enabling business activities in appropriate locations; c. minimises energy use and/or improves energy efficiency; d. enables rural activities that support the rural environment including primary production; e. is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure; f. avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure; g. facilitates the establishment of papakāinga and marae; and h. avoids conflicts between incompatible activities.	b. A determination needs to be made as to whether the site is an appropriate location for business activities. The determination should include an assessment of whether the site is highly productive land. The site has not been identified as a greenfield priority area for business. d. the site is currently used for rural activities, and the proposed development would foreclose the ability to continue those activities on the site. e. Christchurch International Airport is regionally significant infrastructure. The proposed consent conditions are designed to allow the continued safe, efficient and effective use of that airport. Effects on the water race and Christchurch wastewater system can also be managed through consent conditions. f. No significant natural resources have been identified at the site. The proposed consent conditions are designed to avoid adverse effects on Christchurch International Airport which is regionally significant infrastructure. h. There is a potential conflict between the proposed industrial activity and the existing rural activities on the site and in the surrounding area. More information is needed to determine whether the proposal is consistent with Objective 5.2.1.
Objective 6.2.1 Recovery framework	1. Greenfield Priority areas have been identified in Map A of the RPS. The site is not within a priority area for urban development.

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that: 1. identifies priority areas for urban development within Greater Christchurch; ... 3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS; ... 5. protects and enhances indigenous biodiversity and public space; 6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air; 7. maintains the character and amenity of rural areas and settlements; ... 9. integrates strategic and other infrastructure and services with land use development; 10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs; 11. optimises use of existing infrastructure; and ...	3. The site is outside of existing urban areas and greenfield priority areas identified in Map A of the RPS, and the development is not expressly provided for in the RPS. 5. More information is needed regarding the proposed planting and restoration of the water race that adjoins the site in order to determine whether the proposal protects indigenous biodiversity. 6. More information is needed regarding the proposed planting and restoration of the water race that adjoins the site in order to determine whether the proposal maintains or improves the quality of water in surface waterbodies. The proposed stormwater consent conditions are designed to protect the groundwater aquifers below the site. The site is located in a red nutrient allocation zone so protection of groundwater is particularly important. 7. The proposal is likely to have a significant effect on the character and amenity of the rural area. 9. Although the site has not been identified as a priority area for development, it is able to be appropriately serviced with reticulated drinking water and wastewater, as well as electricity and telecommunications. Stormwater consent conditions allow for the appropriate disposal of both construction-phase and operational-phase stormwater. 10. The proposed consent conditions are designed to manage adverse effects on the efficient operation, use, development, appropriate upgrade, and future planning of Christchurch International Airport.
--	--

	The development is inconsistent with Objective 6.2.1(3). More information is needed on the planting and restoration of the water race before consistency with (5) and (6) can be determined.
Objective 6.2.2 Urban form and settlement pattern The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by: ... 4. providing for the development of greenfield priority areas, and of land within Future Development Areas where the circumstances set out in Policy 6.3.12 are met, on the periphery of Christchurch’s urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure; ...	4. The site is not within a greenfield priority area or Future Development Area identified in Map A of the RPS, but is on the periphery of Christchurch’s urban area. Assessments of the anticipated demand for industrial land in the Christchurch City area disagree between the applicant’s expert and the Greater Christchurch Partnership’s view. As a result of that disagreement, it is not possible to determine whether the proposal is consistent with this objective.
Objective 6.2.6 Business land development Identify and provide for Greater Christchurch’s land requirements for the recovery and growth of business activities in a manner that supports the settlement pattern brought about by Objective 6.2.2, recognising that:	1. The site is not located within a greenfield priority area 4. A determination needs to be made as to whether the site is an appropriate location for business activities. The determination should include an assessment of whether the site is highly productive land. The site has not been identified as a greenfield priority area for business.

1. The greenfield priority areas for business in Christchurch City provide primarily for the accommodation of new industrial activities; ... 4. A range of other business activities are provided for in appropriate locations; and ...	Assessments of the anticipated demand for industrial land in the Christchurch City area disagree. As a result of that disagreement, it is not possible to determine whether the proposal is consistent with this objective.
Policy 6.3.1 Development within the Greater Christchurch Area In relation to recovery and rebuilding for Greater Christchurch: 1. give effect to the urban form identified in Map A, which identifies the location and extent of urban development that will support recovery, rebuilding and planning for future growth and infrastructure delivery; ... 3. enable development of existing urban areas and greenfield priority areas, including intensification in appropriate locations, where it supports the recovery of Greater Christchurch; 4. ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are expressly provided for in the CRPS; ...	1. The site is not within a greenfield priority area or Future Development Area identified in Map A of the RPS. 3. The site is not within an existing urban area or greenfield priority area identified in Map A of the RPS. 4. The site is not within an existing urban area or greenfield priority area identified in Map A of the RPS, and the activity is not expressly provided for in the RPS. The proposal is inconsistent with Policy 6.3.1.
Policy 6.3.4 Transport effectiveness Ensure that an efficient and effective transport network that supports business and residential recovery is restored, protected and enhanced so that it maintains and improves	1. More information is needed to determine the effects on State Highway 1, which is a strategic freight route. The Integrated Transport Assessment provided by the applicant states that the proposed development is predicted to generate 774 vehicle movements per hour in the AM peak, 705 vehicles per hour in

movement of people and goods around Greater Christchurch by: 1. avoiding development that will overload strategic freight routes; 2. providing patterns of development that optimise use of existing network capacity and ensuring that, where possible, new building projects support increased uptake of active and public transport, and provide opportunities for modal choice; 3. providing opportunities for travel demand management; 4. requiring integrated transport assessment for substantial developments; and 5. improving road user safety.	the PM peak and 8804 vehicles per day, which is a significant number of vehicle movements. 2. The site is close to existing public transport (bus) routes that would allow people working at the site to make use of that public transport. The site is not well served by cycleways so the use of active transport would be more challenging. 4. An integrated transport assessment was carried out by Novo Group for the applicant. The conclusion reached by that assessment was that the proposed activity would have acceptable and no more than minor transport effects. The proposal is likely to be broadly consistent with Policy 6.3.4.
Policy 6.3.5 Integration of land use and infrastructure Recovery of Greater Christchurch is to be assisted by the integration of land use development with infrastructure by: 1. Identifying priority areas for development and Future Development Areas to enable reliable forward planning for infrastructure development and delivery; 2. Ensuring that the nature, timing and sequencing of new development are co-ordinated with the development, funding, implementation and operation of transport and other infrastructure in order to: a. optimise the efficient and affordable provision of both the development and the infrastructure; b. maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure; c. protect investment in existing and planned infrastructure;	1. The site is not within a Future Development Area or greenfield priority area identified in Map A of the RPS. 2. Although the proposed development would take place outside the areas identified on Map A, it is able to connect to existing water and electricity infrastructure. 3. More information is needed to determine the effects on transport corridors. The Integrated Transport Assessment provided by the applicant states that the proposed development is predicted to generate 774 vehicle movements per hour in the AM peak, 705 vehicles per hour in the PM peak and 8804 vehicles per day, which is a significant number of vehicle movements 4. The proposed conditions relating to Christchurch International Airport are designed to ensure that the development does not affect its efficient operation, use,

d. ensure that new commercial film or video production facilities are connected to reticulated water and wastewater systems; and e. ensure new development does not occur until provision for appropriate infrastructure is in place; 3. Providing that the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained; 4. Only providing for new development that does not affect the efficient operation, use, development, appropriate upgrading and safety of existing strategic infrastructure, including by avoiding noise sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport, unless the activity is within an existing residentially zoned urban area, residential greenfield area identified for Kaiapoi, or residential greenfield priority area identified in Map A (page 6-28) and enabling commercial film or video production activities within the noise contours as a compatible use of this land; and 5. Managing the effects of land use activities on infrastructure, including avoiding activities that have the potential to limit the efficient and effective, provision, operation, maintenance or upgrade of strategic infrastructure and freight hubs.	development, appropriate upgrading and safety. No noise sensitive activities are proposed for the site. The proposal is likely to be broadly consistent with Policy 6.3.5.
Policy 6.3.6 Business land To ensure that provision, recovery and rebuilding of business land in Greater Christchurch maximises business retention, attracts investment, and provides for healthy working environments, business activities are to be provided for in a manner which:	1. The site is not existing business land, or a greenfield priority area identified in Map A in the RPS. 7. The proposal would utilise existing drinking water and wastewater infrastructure. 8. The proposed consent conditions are designed to address reverse sensitivity effects on Christchurch International Airport. More information is needed to determine whether reverse

1. Promotes the utilisation and redevelopment of existing business land, and provides sufficient additional greenfield priority area land for business land through to 2028 as provided for in Map A; ... 5. Recognises that new greenfield priority areas for business in Christchurch City are primarily for industrial activities, and that commercial use in these areas is restricted; ... 7. Utilises existing infrastructure availability, capacity and quality; 8. Ensures reverse sensitivity effects and conflicts between incompatible activities are identified and avoided or mitigated against; 9. Ensures close proximity to labour supply, major transport hubs and passenger transport networks; 10. Encourages self-sufficiency of employment and business activities within communities across Greater Christchurch; 11. Promotes, where appropriate, development of mixed-use opportunities, within Key Activity Centres provided reverse sensitivity issues can be appropriately managed; and 12. Incorporates good urban design principles appropriate to the context of the development	sensitivity effects on other activities in the area have been identified and avoided or mitigated against 9. The proposed activity is in close proximity to Christchurch City and its associated labour supply. The proposal is likely to be broadly consistent with Policy 6.3.6.
Policy 6.3.11 Monitoring and Review In relation to development in Greater Christchurch: 1. The Canterbury Regional Council, in conjunction with the territorial authorities, shall undertake adequate monitoring to demonstrate in the short, medium and the long term that there	1. The assessments supplied by the Applicant identify that existing available industrial land in Christchurch City is inadequate to meet demand in the medium to long term. This is in contrast to the assessment prepared by the Greater Christchurch Partnership in 2023 which concluded that there was sufficient industrial land in greater Christchurch for the

is an available supply of residential and business land to meet the Objectives and Policies of this Chapter and the requirements of the National Policy Statement on Urban Development 2020. ... 4. The Canterbury Regional Council, following relevant territorial authority input, shall initiate a review of the extent and location of land for development if any of the following situations occur: a. a shortfall in available land is identified by monitoring under Policy 6.3.11; or b. it is identified that altered circumstances have arisen or will arise either in one or more parts of Greater Christchurch, in relation to the expected availability of sub– regional infrastructure, and a reconsideration of the extent, location and timing of land for development is necessary to achieve the objectives and policies of this chapter; or c. Housing and Business Development Capacity Assessments undertaken to meet the requirements of the National Policy Statement on Urban Development 2020 indicate insufficient feasible development capacity to meet demand in the short to medium term. 5. Any change resulting from a review of the extent, and location of land for development, any alteration to the Greenfield Priority Areas, Future Development Areas, or provision of new greenfield priority areas, shall commence only under the following circumstances: a. infrastructure is either in place or able to be economically and efficiently provided to support the urban activity;	next 30 years and beyond, with a significant surplus in Christchurch City. 5. d. Assessments provided by the Applicant indicate that Community Drinking Water supplies are unlikely to be contaminated by activities taking place in the proposed development. The proposed consent conditions have been designed to minimise risk to those supplies. Assessments of the anticipated demand for industrial land in the Christchurch City area disagree. As a result of that disagreement, it is not possible to determine whether the proposal is consistent with this objective.
---	--

b. provision is in place or can be made for safe, convenient and sustainable access to community, social and commercial facilities; c. the objective of urban consolidation continues to be achieved; d. urban land use, including industrial and commercial activities, does not increase the risk of contamination of drinking water sources, including the groundwater recharge zone for Christchurch's drinking water; ... g. sufficient rural land is retained to maintain the open space landscape character either between or surrounding the areas of urban activity within Greater Christchurch; and h. the operational capacity of strategic infrastructure is not compromised.	
Objective 7.2.3 Protection of intrinsic value of waterbodies and their riparian Zones The overall quality of freshwater in the region is maintained or improved, and the life supporting capacity, ecosystem processes and indigenous species and their associated fresh water ecosystems are safeguarded.	Details on the protection and restoration of the water race that adjoins the property are needed to determine the effects of the proposal on freshwater quality, and the life-supporting capacity, ecosystem processes and indigenous species in and around that water race. More information is needed on the planting and restoration of the water race before consistency with Objective 7.2.3 can be determined.
Policy 7.3.1 Adverse effects of activities on the natural character of freshwater To identify the natural character values of fresh water bodies and their margins in the region and to:	Details on the protection and restoration of the water race that adjoins the property is needed to determine the effects of the proposal on the natural character of that water race and its margins.

1. preserve natural character values where there is a high state of natural character; 2. natural character values where they are modified but highly valued; and 3. improve natural character values where they have been degraded to unacceptable levels; unless modification of the natural character values of a fresh water body is provided for as part of an integrated solution to water management in a catchment in accordance with Policy 7.3.9, which addresses remedying and mitigating adverse effects on the environment and its natural character values	More information is needed on the planting and restoration of the water race before consistency with Policy 7.3.1 can be determined.
Policy 7.3.6 Fresh water quality In relation to water quality: 1. to establish and implement minimum water quality standards for surface water and groundwater resources in the region, which are appropriate for each water body considering: a. the values associated with maintaining life supporting capacity, ecosystem processes and indigenous species including their associated ecosystems, and natural character of the water body; b. any current and reasonably foreseeable requirement to use the water for individual, marae or community drinking water or stockwater supplies, customary uses or contact recreation; c. the cultural significance of the fresh water body and any conditions or restrictions on the discharge of	Details on the protection and restoration of the water race that adjoins the property is needed to determine the effects of the proposal on the water quality of that water race. More information is needed on the planting and restoration of the water race before consistency with Policy 7.3.6 can be determined.

contaminants that may be necessary or appropriate to protect those values; and d. any other current or reasonably foreseeable values or uses; and 2. to manage activities which may affect water quality (including land uses), singularly or cumulatively, to maintain water quality at or above the minimum standard set for that water body; and 3. where water quality is below the minimum water quality standard set for that water body, to avoid any additional allocation of water for abstraction from that water body and any additional discharge of contaminants to that water body, where any further abstraction or discharges, either singularly or cumulatively, may further adversely affect the water quality in that water body: a. until the water quality standards for that water body are met; or b. unless the activities are undertaken as part of an integrated solution to water management in the catchment in accordance with Policy 7.3.9, which provides for the redress of water quality within that water body within a specified timeframe.	
Policy 7.3.7 Water quality and land uses To avoid, remedy or mitigate adverse effects of changes in land uses on the quality of fresh water (surface or ground) by: 1. identifying catchments where water quality may be adversely affected, either singularly or cumulatively, by	Details on the protection and restoration of the water race that adjoins the property is needed to determine the effects of the proposal on the water quality of that water race. More information is needed on the planting and restoration of the water race before consistency with Policy 7.3.7 can be determined.

increases in the application of nutrients to land or other changes in land use; and 2. controlling changes in land uses to ensure water quality standards are maintained or where water quality is already below the minimum standard for the water body, it is improved to the minimum standard within an appropriate timeframe.	
Chapter 9 – Ecosystems and Indigenous Biodiversity	
Objective 9.2.1 Halting the decline of Canterbury’s ecosystems and indigenous biodiversity The decline in the quality and quantity of Canterbury’s ecosystems and indigenous biodiversity is halted and their life-supporting capacity and mauri safeguarded.	Details on the protection and restoration of the water race that adjoins the property is needed to determine the effects of the proposal on the ecosystems and indigenous biodiversity of that water race. More information is needed on the planting and restoration of the water race before consistency with Objective 9.2.1 can be determined.
Objective 9.2.2 Restoration or enhancement of ecosystems and indigenous biodiversity Restoration or enhancement of ecosystem functioning and indigenous biodiversity, in appropriate locations, particularly where it can contribute to Canterbury’s distinctive natural character and identity and to the social, cultural, environmental and economic well-being of its people and communities.	More information is needed on the planting and restoration of the water race before consistency with Objective 9.2.2 can be determined.
Policy 9.3.2 Priorities for protection To recognise the following national priorities for protection:	One threatened species of geranium has been identified at the site. Consent condition have been proposed to protect that species.

1. Indigenous vegetation in land environments where less than 20% of the original indigenous vegetation cover remains. 2. Areas of indigenous vegetation associated with sand dunes and wetlands. 3. Areas of indigenous vegetation located in “originally rare” terrestrial ecosystem types not covered under (1) and (2) above. 4. Habitats of threatened and at risk indigenous species.	The proposal is likely to be consistent with Policy 9.3.2
Policy 9.3.3 Integrated management approach To adopt an integrated and co-ordinated management approach to halting the decline in Canterbury’s indigenous biodiversity through: ... 4. setting best practice guidelines for maintaining indigenous biodiversity values, particularly maintaining conditions suitable for the survival of indigenous species within their habitats, and safeguarding the life-supporting capacity and/or mauri of ecosystems	A Lizard Management Plan has been developed to protect any lizards that may be present at the site. The proposal is likely to be consistent with Policy 9.3.3
Policy 9.3.4 Promote ecological enhancement and restoration To promote the enhancement and restoration of Canterbury’s ecosystems and indigenous biodiversity, in appropriate locations, where this will improve the functioning and long term sustainability of these ecosystems.	More information is needed on the planting and restoration of the water race before consistency with Policy 9.3.4 can be determined.
Chapter 14 – Air Quality	

Objective 14.2.1 Maintain or improve ambient air quality Maintain or improve ambient air quality so that it is not a danger to people's health and safety, and reduce the nuisance effects of low ambient air quality.	Consent conditions have been developed to manage dust at the site. The proposal is likely to be consistent with Objective 14.2.1.
Objective 14.2.2 Localised adverse effects of discharges on air quality Enable the discharges of contaminants into air provided there are no significant localised adverse effects on social, cultural and amenity values, flora and fauna, and other natural and physical resources.	Consent conditions have been developed to manage dust at the site. The proposal is likely to be consistent with Objective 14.2.2.
Policy 14.3.1 Maintain and improve ambient air quality In relation to ambient air quality: 1. To set standards to maintain ambient air quality in Canterbury based on concentrations of contaminants that cause adverse health effects and nuisance 2. Where existing ambient air quality is higher than required by the standards set, to only allow the discharge of contaminants into air where the adverse effects of the discharge on ambient air quality are minor. 3. To give priority to ensuring that PM10 ambient air quality improvements are achieved in Rangiora, Kaiapoi, Christchurch, Ashburton, Timaru, Geraldine and Waimate.	Consent conditions have been developed to manage dust at the site. The proposal is likely to be consistent with Policy 14.3.1.
Policy 14.3.3 Avoid, remedy or mitigate localised adverse effects on air quality	Consent conditions have been developed to manage dust at the site. The proposal is likely to be consistent with Policy 14.3.3.

To set standards, conditions and terms for discharges of contaminants into the air to avoid, remedy or mitigate localised adverse effects on air quality.	
Chapter 15 - Soils	
Objective 15.2.1 Maintenance of soil quality Maintenance and improvement of the quality of Canterbury's soil to safeguard their mauri, their life supporting capacity, their health and their productive capacity.	The proposed activity will not maintain the productive capacity of the soil at the site. The proposal is inconsistent with Objective 15.2.1.
Policy 15.3.1 Avoid remedy or mitigate soil degradation Maintenance and improvement of the quality of Canterbury's soil to safeguard their mauri, their life supporting capacity, their health and their productive capacity.	The proposed activity will not maintain the productive capacity of the soil at the site. The proposal is inconsistent with Policy 15.3.1.
Chapter 17 – Contaminated Land	
Objective 17.2.1 Protection from adverse effects of contaminated land Protection of people and the environment from both on-site and off-site adverse effects of contaminated land	Contaminated land has been identified at the South-East corner of the site. The proposed consent conditions seek to protect people and the environment from adverse effects of that contaminated land. The proposal is likely to be consistent with Objective 17.2.1.
Policy 17.3.2 Development of, or discharge from contaminated land In relation to actually or potentially contaminated land, where new subdivision, use or development is proposed on that land, or where there is a discharge of the contaminant from that land:	Contaminated land has been identified at the South-East corner of the site. The proposed consent conditions seek to protect people and the environment from adverse effects of that contaminated land.

1. a site investigation is to be undertaken to determine the nature and extent of any contamination; and 2. if it is found that the land is contaminated, except as provided for in Policy 17.3.3, the actual or potential adverse effects of that contamination, or discharges from the contaminated land shall be avoided, remedied or mitigated in a manner that does not lead to further significant adverse effects.	The proposal is likely to be consistent with Policy 17.3.2.
Chapter 18 – Hazardous Substances	
Objective 18.2.1 Avoid, remedy or mitigate adverse effects Adverse effects on the environment from the storage, use, disposal and transportation of hazardous substances are avoided, remedied or mitigated.	Proposed consent conditions cover spills of fuel or any other hazardous substances within the site. The proposal is likely to be consistent with Objective 18.2.1.
Policy 18.3.1 Protection of sensitive areas and activities Avoid actual or potential adverse effects, resulting from the use, storage or disposal of hazardous substances, in the following locations: 1. High hazard areas 2. Within a community drinking water protection zone, or within such a distance from a community drinking water supply that there is a risk of contamination of that drinking water source 3. In areas of unconfined or semi-confined aquifer, where the depth to groundwater is such that there is a risk of contamination of that groundwater	Proposed consent conditions cover spills of fuel or any other hazardous substances within the site. The proposal is likely to be consistent with Policy 18.3.1.

4. Within the coastal marine area and in the beds of lakes and rivers 5. Within any area identified by a district or regional plan as being sensitive to the potential effects of hazardous substances, which may include, but are not limited to, areas such as wāhi tapu, urupā, institutions and residential areas.	
Policy 18.3.2 Avoid, remedy or mitigate adverse effects To avoid, remedy or mitigate adverse effects on the environment, including contamination of land, air and water, associated with the storage, use, transportation or disposal of hazardous substances.	Proposed consent conditions cover spills of fuel or any other hazardous substances within the site. The proposal is likely to be consistent with Policy 18.3.2.