Stantec

Memo

To:	Dean Christie Ngāi Tahu Property, 15 Show Place, 8024, Christchurch, New Zealand	From:	Laura Drummond Level 3, 2 Hazeldean Road Addington, Christchurch 8024 NEW ZEALAND Mail to: PO Box 13052, Christchurch 8140
Project/File:	NTP Development Holdings Ltd	Date:	16 December 2025

Reference: Section 55 Applicant Response to Pound Road Fast Track Comments – Aquatic Ecology

Declaration and Qualifications

My name is Laura Drummond; I have a MSc in Ecology and 18 years' experience in aquatic ecology research and consulting and am a Senior Principal Aquatic Ecologist / Group Leader – Environmental Science at Stantec NZ. I previously held the position of Principal Scientist at Instream Consulting and authored the original Aquatic Ecology Assessment Report (Instream 2025).

I have been asked by NTP Development Holdings Limited ('NTP') to provide a response to the aquatic ecological matters contained within the written comments on Pound Road Industrial Development application from persons invited by the Panel to comment under Section 53 of the Act. My response is primarily in regard to the technical review undertaken by EOS ecology (review dated 31 October 2025) on behalf of Christchurch City Council (CCC). I also provide comment on the Section 53 comments from the Department of Conservation (DoC) associated with aquatic ecology. I have also reviewed the Section 53 comments from Canterbury Regional Council (CRC) related to surface water, and I note that there are no further concerns or matters in disagreement. The conditions of consent relative to surface water effects are agreed between NTP and CRC.

Although this is not an Environment Court proceeding, I confirm that I have read the Environment Court Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 and agree to comply with it. I confirm that the opinions expressed in this statement are within my area of expertise except where I have relied on the evidence of other persons. I have not omitted to consider materials or facts known to me that might alter or detract from the opinions I have expressed.

The technical review was in agreement with a number of matters within the ecology assessment, including agreement with the classification of the waterways in relation to the District Plan and LWRP, with the section of race within the site classified as an 'artificial watercourse' and the Paparua water race flowing along the boundary of the site being classified as a 'network waterway' and not a 'river'. This is an important distinction, as artificial watercourse do not meet the definition of 'river' in relation to

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the National Policy Statement for Freshwater Management 2020, as amended October 2024 (NPS-FM) policy 3.24 to avoid the loss of river extent and values. Thus, mitigation for the loss of the artificial watercourse is not required under the NPS-FM. Despite this, mitigation planting along the Paparua water race was recommended in the Aquatic Ecology Assessment Report, recognising the artificial watercourse provides aquatic habitat for fish as it is connected to the Barters Road extent of the Paparua water race. It is recognized that varying technical reports cited different reasons for this riparian planting.

A point of disagreement with the EOS Ecology technical review is the recommendation for an assessment of environmental effects to the Paparua water race, which flows adjacent to the site. This level of assessment is not considered to be required for this application, the reasons being that the water race flows along the boundary of the site, and no changes to the water race, such as closure, piping or discharges to the watercourse, are proposed. It is acknowledged that two culverts will be installed, and the road will be widened by 1m. However, the culvert installation is a permitted activity under the Christchurch District Plan, subject to design (which has been met), and the road widening will be undertaken predominantly outside of the 5m waterway setback (4.8m buffer to be retained, on average). Therefore, no effects assessment is considered necessary (nor is any offset required). The ecological assessment highlighted the extensive downstream piping of the Paparua water race, which would limit fish passage and the ecological value of the water race at this location. Apart from the culvert installations, which will be undertaken with appropriate works area isolation, flow bypass and fish salvage, there are no other physical works or discharges that will impact the ecological values of the stream. I have also reviewed the Section 53 Comments received from CRC in regard surface water values. It is noted that CRC have not raised any concerns with this work, and the applicant is in agreement with CRC conditions regarding the culvert works/fish passage. Because of the negligible level of effects considered to the Paparua water race as a result of these permitted activities, the proposed mitigation (isolation and pumping, fish salvage and erosion sediment control) and the extensive piping of this waterway downstream, no habitat offset is considered needed.

In regard to construction phase stormwater, this was addressed in section 4.3 of the Ecology Assessment Report. Construction phase stormwater will be stage specific and discharged to ground. Therefore, risk of overland flow to the Barters Road extent of the Paparua water race or infiltration to ground surfacing at water bodies downgradient is very low. Erosion and sediment control plans will be required for any ground disturbance work in proximity to the Paparua water race, such as culvert installations and road widening to minimize risk of overland runoff to the water race.

The DoC Section 53 comments include a recommendation to ensure a Fish Management Plan is prepared, and certified by CRC, with a recommended condition update provided. I have reviewed this condition and consider conditions 22-25 of the CRC land use consent cover the requirements for fish salvage at this site. I also note that CRC have not raised any concerns with the proposed fish salvage conditions. I agree with the EOS Ecology technical assessment that freshwater mussels/kakahi should also be relocated if encountered during salvage efforts. I also agree that the existing bankside vegetation should be retained (Swamp kiokio (*Blechnum minus*) and swamp sedge (*Carex secta*) should be retained, where practicable.

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With respect to the additional condition recommended by EOS Ecology (see Table 3 of their comments), I agree that a condition specifying culvert are to be designed in accordance with NZ Fish passage guidelines, and that a suitably qualified ecologist should review the design.

In summary, I maintain the opinion that there are no adverse impacts that reach the threshold of a 'sufficiently significant adverse impact' such that they need to be taken into account in terms of an assessment under s85 of the Fast-track Approvals Act 2024. The loss of approximately 280m^2 of artificial watercourse does not have a requirement under the NPS-FM for offsetting. However, mitigation for the artificial aquatic habitat loss has been provided for in the form of native riparian planting along the true left bank of the site. Current designs show this from 0.8m (average) to the property boundary. To improve the ecological value of this planting it is recommended that this 5m planted area starts from the top of the watercourse bank. Maintenance and management of the native planting area alongside the Paparua water race should be specified as part of a planting plan, as per a consent condition.

Yours sincerely

Stantec New Zealand

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