



Appendix 18 Consultation Documents & Records – Novo Group

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Pre-application planning advice

Site Address	173 and 111 Pound Road 570, 578 Waterloo Road 2, 38, 64, 86 and 94 Barbers Road 4, 22, 30, 40 and 48 Hasketts Road (inclusion of 14 Hasketts TBC).
Proposal description	Fast Track Industrial Subdivision
Applicant	Ngai Tahu Property Limited
Pre-app reference #	PRE1355578

Meeting			
Date	21/05/2025	Start time	2:00pm
		Finish time	3:00pm
Council attendees			
Name:	Role:	Contact Information:	
Sean Ward	Team Leader Planning	Sean.ward@ccc.govt.nz	
Rachel Wilson	Senior Planner	Rachel.Wilson@ccc.govt.nz	
Alison Tang	Water Supply & Wastewater Assets Planning Engineer	Alison.Tang@ccc.govt.nz	
Brian Norton	Senior Stormwater Planning Engineer	Brian.Norton@ccc.govt.nz	
Chris McClure	Herpetologist	christine.mcclure@ccc.govt.nz	
Katie Kerr	Waterways Ecologist	katie.kerr@ccc.govt.nz	
Peter Rodgers	Transport Network Planner	peter.rodgers@ccc.govt.nz	
Yvonne McDonald	Senior Subdivision Engineer	Yvonne.McDonald@ccc.govt.nz	
William Field	Senior Urban Designer	William.Field@ccc.govt.nz	
Applicant attendees			
Name:	Role / Company:	Contact Information:	
Dean Christie	NTP Development Holdings Limited		
Tallulah Park	Chapman Tripp		
Jo Appleyard	Chapman Tripp		
Laura Drummond	Instream		
Jeremy Phillips	Novo Group		
Georgia Brown	Novo Group		
Todd Inness	DLS		
Anne Wilkins	Novo Group		
Nick Fuller	Novo Group		
Mark Lewthwaite	Powell Fenwick		
Samantha King	Wildland Consultants Limited		

Advice

Proposal / Scope of advice

60ha industrial development proposed. The intent is to consent the development to be similar to the industrial general zone. Very similar to the Ryan's Road fast track proposal.

Sought feedback on how to make fast track applications easier to review by Council.

The consent is to be staged starting with the Lot 200 reserve and surrounds and staging upwards.

Lot 72 is owned by a neighbouring property. If this site was to be subdivided it would create a through road. The collection of smaller allotments are likely to be used for contractors yards and no commercial or retail.

Aiming to submit their application within three weeks.



Planning / District Plan – Rachel Wilson
<ul style="list-style-type: none"> - Noise: the assessment will need to show compliance with the District Plan or provide acoustic treatment. As mentioned in the meeting, it is unlikely this will be needed until a specific activity is proposed. Careful consideration of permitted industrial activities are needed to in terms of maintaining rural amenity generally in the surrounding area. - In terms of earthworks, if filling is higher than 500mm along exterior boundaries, fencing and filling cross sections would need to be identified to assess the visual amenity effect. Not many dwellings are located near the boundaries therefore higher fencing could address this matter. - The key area of rural amenity assessment is the exterior boundaries, particularly Barbers Road as the rural/residential activity are oriented towards the road. The applicant has proposed trees to replace the existing shelter belts on site which would assist with this effect. Consideration of a vegetation buffer and larger building setback may assist. The landscape approvals team have recommended 5 metres to ensure successful planting but it is noted that the separation created by the waterway may also achieve this. Replication of the width and location of shelter belts could be of assistance with mitigating rural amenity. The south west industrial zone (heavy) have a buffer zone rule which might be a good guidance tool (noting it is a large buffer (10 metres) proposed due to the industrial heavy status). The policies of the rural zone also might be a helpful guide. - While sites directly within the proposed industrial area may change over time, the temporal effects of the interface between this site and neighbouring properties need to be considered. - As recommended by the ecology section below a vegetation buffer from the site of ecological significance (golf course is proposed). - No concerns raised in terms of the internal design.
Urban Design – William Field
<ul style="list-style-type: none"> - Concerned about the boundary interfaces along external boundaries. This includes adjoining neighbouring land, the golf course and to the southwest which is rural residential (Rural Urban Fringe). Further to this, consideration of effects from potentially tall and bold coloured buildings, signage, lighting (glare), boundary fencing and services screening design, and visibility of car parking and vehicle accessways. - Potentially requiring conditions to keep road along barbers road appear rural including boundary tree planting and setbacks. - In relation to the golf course (ccc owned land and SES) boundary, a planted buffer of appropriately scaled trees and edge planting would help to mitigate potential adverse visual effects of industrial activities and buildings on the recreation and landscape amenity of the golf course. Conditions could address this. - Need to understand which way the industrial activities will face along Barbers Road - Barbers road, depending on water ecology report, landscaping buffer and building setback/outdoor storage space restriction may be imposed in this area.
Transport – Liqi Chen and Peter Rodgers
<ul style="list-style-type: none"> - The applicant has utilised the QTP Modelling for the area. Pound Road is proposed to have roundabout intersection (or traffic lights if needed) and to reduce the speed to 60. This would be in line with the current legislation and would reflect the change from rural to industrial activities. - There is potential the southern area of pound road (remaining as legal road after the NZTA realignment of Pound Road to be road stopped. This is not a process of subdivision but can occur during the construction phase. This could be sold back to the developer or utilised as reserve if needed. This may require further discussion along the fast track process and could be added as an advice note in conditions. - Applicant is proposing to have no occupation of industrial activities along pound road until an approach to upgrading pound road is decided/proposed by NZTA. It is recommended that the applicant consult with NZTA due to the importance of Pound Road (the road is currently considered over capacity currently). Action: Applicant to contact NZTA Mike Blyleven michael.blyleven@nzta.govt.nz

- Barter Road intersections are proposed to be roundabouts also.
- Speed Limits: The change in land use from this subdivision would change the classification of this Pound Road and Barter Road from "Peri-Urban Road" and "Rural Roads" respectively, to "Urban Connector" under the One Network Framework classification system.
- The current 80km/h would be inappropriate for the non-rural land use under the current legislation and therefore the new intersection(s) should be designed assuming a speed limit of 60km/h at most. Note that due to the time required to consult on speed limit changes following this subdivision being consented, and the upcoming local government elections, any decision on speed limits would be made by the incoming Council after this subdivision has been consented, early 2026 at the earliest. As a result this subdivision might proceed to detailed engineering design prior to a decision on the speed limit being reached. If so, assume a design speed of 60km/h with a possibility of 50km/h.
- No direct road access is proposed for the allotment facing Barter Road. This will need to be conditioned or consent notice to ensure this occurs.
- Kiwirail consider themselves an affected party when nearby developments increase the use of railway crossings in a location. It is recommended the applicant consult with Kiwirail before applying for the fast track application.
- Lot 200's footpath is an appropriate solution for pedestrians to get to neighbouring bus stop. The formation is likely to be 2.5m wide.
- Internal roads are of a sufficient width. 2m wide tree berms recommended for the road to ensure good street species.
- Cul de sacs will need to provide evidence of truck manoeuvring

Stormwater/Flooding - Brian

- Onsite mitigation will be required. First flush treatment and 2% AEP disposal to ground.
- There will likely be consent notices requiring specialised treatment of high zinc- or copper-generating roof materials.
- Council's preference is for all stormwater, both public roads and private hardstand (except building roofs) to discharge into integrated subdivision stormwater treatment and rapid soakage basins to vest as reserves.
- Potentially apply for road network to be under CCC global consent and individual sites under ECan approval, however, it can get complicated with separate authorisations to know who is responsible for discharges if there is a compliance issue.
- Individual onsite treatment systems are unlikely to be covered under CCC global consent because Council does not want to continually monitor sites for maintenance and compliance.
- **Action: Todd to provide summary to Brian to review.**
- If Lot 201/202 are not required for stormwater, they will need to revert to industrial lots. This can be conditioned.

Water/Wastewater – Alison Tang

- The applicant confirmed receipt and review of the WSP water supply & wastewater modelling output reports and is aware of the constraints for wastewater/water. They are aware the project creates a shortfall in capacity for both waters and there is no redundancy.
- While the applicant's preference is to install low pressure sewer servicing with storage provided for each allotment with a consent notice to discharge during off-peak periods, Council Three Waters will review options and discuss internally to confirm the required servicing type.
- For water, the three options being considered are to upgrade the existing network, sink a new bore, or store water onsite.
- Fire water design supply is likely to be FW3, with each lot designing from there in accordance to their site requirements.
- The water supply & wastewater Conditions of Consent will rely on a concept design that has concurrence in principle from Three Waters teams.
- **Todd Innes with DLS followed up on 22/05 with the summary:**
Sewer;

- Development to be serviced by LPS discharging to the 375mm pipe in Pound/Waterloo Road WWAcessID 45971.
 - Each lot will be required to provide private storage and their associated LPS tank and pump based on their anticipated flows.
 - Proposing storage is based on 8 hours ASF.
 - Lots to discharge at off peak time, enforced by way of consent notice.
 - This will provide the best "buffering", whilst ensuring CCC aren't stuck maintaining and owning a "communal" storage tank.
- Water Supply;
- Obvious constraints in the existing supply network, including residual pressure, headloss and redundancy.
 - Development to connect to the existing 200mm main in Waterloo Road/Pound Road intersection.
 - FHC3 anticipated to be the most likely end use. FW4 expected for the subdivision.
 - 50l/s fire demand, using Table 2 of SNZ PAS 4509 – 90-minute firefighting time = 540m³ storage for fire requirements.
 - Including redundancy, approximately 1000m³ tank, with jockey and booster pumps as required.
 - This would help buffer the base demand on the existing network as well.
 - If CCC were after additional storage, we would be happy to look at a PDA.
 - Upgrading of the existing network doesn't solve the issue of redundancy.
 - The only other option would be a new bore, however preference is going to be to avoid this at all costs for obvious reasons.

It is noted that the original modelling reports both considered the Innovation Park Industrial plan change as part of their worst-case modelling.

It is noted that this plan change application has since been withdrawn.

Goes without saying but mains and submains etc. will all be designed and located in accordance with CCC requirements. A full model will be undertaken at the time of detailed design as well.

Ecology

Lizards – Chris McClure

- 45 Skinks found across the whole site, high density to the southern end of the site but observations across.
- The rough area of the golf course (where pines have been removed) is proposed for the relocation. Predator control is proposed such as rabbit proofing to limit access for hedgehogs etc.
- Relocation needs to take into account planting establishment period (a couple of years) and whether the area is existing habitat for lizards (slush piles). Need to understand the carrying capacity of the area before introducing the relocated lizards.
- A wildlife permit is required
- Parks approvals will be required. Contact Anthony Shadbolt in the first instance - antony.shadbolt@ccc.govt.nz

Waterways – Katie Kerr

- Aquatic ecology assessments have been undertaken by the applicant and the assessment will be provided with application.
- CCC do not have any information on waterway and ecological value.
- The internal drainage channel is mostly dry except an alignment which has an artificial channel. The internal channel is proposed to be removed. The internal section of the water race found upland bullies but no other fish present. The ecological value is likely to be low. However, the presence of fish indicates water is present enough to support aquatic life.
- The water race along Barters Road will be left as is, two vehicle crossings with associated culverts will be required. The waterways would be classified as a network waterway and have a 5 metre setback. Network waterways are required, where feasible, to create and enhance ecological corridors for terrestrial and aquatic animals and plants.
- Discussions with Selwyn regarding the proposal will need to occur regarding any water race closures.

- Depending on the assessment provided, this would indicate whether enhancement of the drain along Barbers Road is required. Identification of any fish passage barriers downstream will assist with this determination on future potential and should be included in assessment.

Plant Ecology – Nicholas Head Nicholas.head@ccc.govt.nz

- North of the site, the Golf course is identified as site of ecological significance. This is due to uncommon kowhai species being located in the area. It is recommended that buffer zones are provided to protect ecological values as well as provide mitigation for the transition from rural activities to industrial. This would involve planting the boundaries in appropriate native species.
- Mr Head considered it likely there are no botanical values remaining as the site looks highly modified but an ecological assessment is needed to confirm this.

Bird Ecology – Andrew Crossland – Andrew.Crossland@ccc.govt.nz

- The site is outside the prescribed birdstrike area however, the usual approach to subdivisions is to address bird strike due to the retention ponds proposed. Council has standardised conditions, or an ecologist report can be submitted that birdstrike mitigation is not needed for the site.
- Earthwork season usually coincides the same time as bird breeding season. We have prescribed conditions on how to address this but essentially a bird management plan is required during the subdivision works. This is to avoid any issues in regard to protected species under the wildlife act.

Environmental Health - Agnes van der Erf

"I've checked the LLUR and only one property is listed as HAIL and this is at 40 Hasketts Road for pest control A11. This is possibly related to some broiler sheds that were built in the 1970's. On checking Council records most of the properties contain at least one septic tank (not HAIL) and to the north of 86 Barbers Road is what looks like a waste pit (snip below). 40 Hasketts Road also contained a tunnel house in the late 1990's. These areas will require investigating by a contaminated land specialist with at least PSI."

Water supply for fire fighting

Consult early on with the FENZ Risk Reduction Team - Canterbury-RRTeam@fireandemergency.nz

Post-meeting follow-up actions

Feedback for applicant prior to lodging fast track:

If possible, if draft conditions are provided to council for review prior to lodging fast track application this may assist with Council providing further guidance.

NOTE:

Pre-application advice is confidential and is given without prejudice on the basis of the information provided and the applicable District Plan rules at the time. Changes to the proposal, the provision of additional information, or subsequent changes to the District Plan may impact on this advice.

Please include your PRE number when applying for a consent

From: [Wilson, Rachel](#)
To: [Georgia Brown](#)
Subject: Pound Fast Track - Minutes from today's meeting
Date: 04 July 2025 17:25:22
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

Hi Georgia,

Thank you for your time earlier today. Here are some notes below with Alison's additional commentary:

Wastewater

- The model is getting re-run – Alison will query the expected updated model output availability date
- There are concerns about capacity even for lower pressure sewer flows
- The preference is gravity (if possible) as low pressure sewer is not compatible with some industrial activities, and Council cannot prevent pumps from being replaced with incompatible pump types, which would negatively affect the local network. In the Mania / Hornby South local pressure sewer limited discharge area, there is a 0.09 l/s/ha average restriction plus requirement to utilise domestic (residential) sized pumps for industrial application which are potentially not appropriate for the intended activity.
- While gravity would have the same flow restrictions, it will be easier understood by future land owners. Applicant states the wastewater for this development will not be able to be managed similarly to how Waterloo Business Park's wastewater flow allocations are being managed.
- DLS says pump stations are still being investigated.

Water

- Option 1 is the favoured option by Council, as it is considered that option three has water quality risks and a high maintenance requirement on a council asset
- FW4 fire demand would be achieved with option 3, but the applicant notes purchasers will need to understand the requirements of the upgrade before proceeding
- DLS raised concern with option one is that it does not deal with redundancy (while it addresses pressure and demand). Redundancy is good to have industrial zones due to the fire risk nature of some industrial activities.
-

Roading

- Culvert design seems fine as long as height of the road can be catered for carriageway and services.
- Altered design looks ok noting roundabouts will be assessed in detail at engineering design phase.
- Aiming to reduce the speed limit but can't guarantee what speed this will be in the

future. Road design is to cater a 60km/hr speed.

Alisons further commentary:

Also, here are our points about wastewater:

1. By providing for a gravity wastewater service, it will be possible to manage the overall capacity of the development as opposed to strictly regulating the sewer limit against each lot. Like Waterloo Business Park, this will enable some properties to exceed the 'sewer limit' set by Council's sewer limit overlay that constraints flow to 0.09 L/s/ha. This will not be possible for an LPSS service type which will require individual consent notices against each lot to strictly control the LPSS discharge from each individual lot.
2. There is a risk that at low design flows i.e. at 0.09 l/s/ha, the LPSS system will be undersized or rather a risk that property owners will change pumps / pumping rates / etc. that will negatively impact the system. This may result in the need to restrict the type and number of local pressure sewer pumps that can be deployed. In cases such as Hornby South, a consent notice dictates that 'residential only' pumps to be used. Property owners are not happy with this as it is not efficient or cost effective. A need has been expressed for the ability to install industrial (Aquatech) pumps because these pumps operate at higher flow rate.
3. Because the local pressure sewer units will be privately owned, Council will have limited to no control for O&M purposes. Because Council will be unable to control the system or maintain it, it will likely require that the LPSS network to remain in private ownership (same as the Airport) – especially since the LPSS connection will not be established on road to vest. Council does not have to take ownership of the network. This argument will not hold for a gravity network serviced by a dedicated wastewater pump station.

Depending on the decisions, the following specific consent conditions to be added:

- Consent notice of sewer limit at 0.09 l/s/ha
- Consent notice for type and size of local pressure sewer pump to limit flow
- Allow connection but keep LPSS network private
- Flow monitor to be put in place for LPSS discharge

Thanks,

Rachel Wilson
Senior Planner
Planning Team 5



[03 941 8650](tel:03_941_8650)



Rachel.Wilson@ccc.govt.nz



Te Hononga Civic Offices, 53 Hereford Street, Christchurch



PO Box 73013, Christchurch 8154



ccc.govt.nz



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From: [Keenan, Sheryl](#)
To: [Georgia Brown](#); [Wilson, Rachel](#)
Subject: Pound Road Fast-track consent - culvert approval in waterway corridor/overland flow path [Filed 16 Jul 2025 08:07]
Date: 15 July 2025 19:10:10
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image011.png](#)
[image012.png](#)
[Re Paparua Water Race Filed 01 Jul 2025 1156.msg](#)
[20739 - Culvert Design & Construction Methodology R0 .pdf](#)
[Cross section culvert.pdf](#)
[20739_ESCMP_R0.pdf](#)

Hi Georgia

As noted below, I have taken a very light touch to the review of this culvert in terms of the acceptability of this structure in the waterway channel as I understand the following matters are being separately addressed:

- Waterway asset owner approval including consideration of conveyance requirements – by Selwyn District Council.
- Any approval for vesting of the asset in CCC – by CCC's roading team.
- Stormwater discharge and erosion and sediment control matters – addressed separately with my team, through the final consenting and/or ECan as part of earthworks and/or stormwater discharge processes/approvals.
- Any waterway resource consenting needed for these works.

The waterway is not a CCC asset and the culvert will not vest in the Three Waters team at CCC, and therefore in this case, while Bylaw authorisation is required for this, the assessments relating to the acceptability of this structure placement are being undertaken by other parties. This approval is therefore subject to all other relevant approvals being in place.

Please consider this email to be authorisation under the Stormwater and Land Drainage Bylaw 2022 (s13-14) for the placement of the culvert (as detailed in the attached, or subsequent amendment, subject to all other relevant approvals being gained) within the waterway corridor/potential overland flow path.

Regards

Sheryl Keenan

Planning Engineer – Surface Water
Asset Planning - Stormwater & Waterways

 03 941 5298
 Sheryl.Keenan@ccc.govt.nz
 Te Hononga Civic Offices, 53 Hereford Street, Christchurch
 PO Box 73014, Christchurch 8154
 ccc.govt.nz



From: Georgia Brown <Georgia@novogroup.co.nz>
Sent: Thursday, 3 July 2025 11:46 am
To: StormwaterApprovals <Stormwater.Approvals@ccc.govt.nz>; Wilson, Rachel <Rachel.Wilson@ccc.govt.nz>
Subject: RE: Pound Rd - FT meeting and culvert details

Hi both

See attached confirmation from SDC regarding the culvert works. I suspect we still need to speak to CCC roading team too however, [@Wilson, Rachel](#) – can you please let me know who would be best placed to talk to about this?

Thanks,

Georgia Brown
Senior Planner

M: 021 193 6484 | O: 03 365 5570
E: Georgia@novogroup.co.nz | W: www.novogroup.co.nz
Level 1, 279 Montreal Street | PO Box 365 | Christchurch 8140



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From: Georgia Brown
Sent: 01 July 2025 08:29
To: StormwaterApprovals; Wilson, Rachel
Subject: RE: Pound Rd - FT meeting and culvert details [Filed 01 Jul 2025 08:29]

Thanks for the quick feedback, Sheryl. We've been in discussions with SDC but will get something in writing for them to provide you with.

Georgia Brown
Senior Planner

Pre-Application Advice for Ngai Tahu Property Development Holdings – RMA254638

Disclaimer: This technical advice note does not constitute legal advice and should not be relied upon as such. Please note this preliminary advice has been given prior to any official guidance from the Ministry for the Environment relating to CRC's role under the Fast-Track Approvals Act 2024.

Meeting Date:	22 May 2025
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Executive Summary

Ngai Tahu Property Development Holdings (NTP) (the applicant) have sought a meeting with Canterbury Regional Council (CRC) to discuss the potential option of using the Fast-Track Approval Act (FTAA) for the project to subdivide land and develop industrial lots (approximately 50 lots ranging between 2,000 square metres and 1.5 hectares, comprising approximately 84 lots across the full site) at or about 173 Pound Road, east of Barbers Road. The project is listed in Schedule 2 of the FTAA.

CRC Staff – David Sluter, Anna Stewart, Vaughan van Noorden and Mihail Davidovski (Consent Planning) and Kate Williman (Policy Planning),
APPLICANT – Georgia Brown (Novo Group), Tood Inness (DLS) and Laura Drummond (Instream)

Introduction

Fast-Track Act Consenting:

Under the Act, the applicant is required under section 11(1)(a) to consult with relevant local authorities. NTP will need to provide evidence of this consultation as part of their application.

This pre-application meeting forms part of this consultation and discusses the process going forward for any potential applications by NTP under the FTAA.

Pound Road Industrial Development Project:

The applicant requested a pre-app meeting to discuss the proposed Fast-Track application. Specifically, the applicant sought advice relating to:

Water consent

- Unlikely to be required as no water take or dewatering is required and the permitted standards can be met regarding works around the water race.

Land use consent

- Earthworks required to establish subdivision.

Discharge consent

- Construction phase stormwater will need consent meanwhile operational stormwater from the roads will be captured under the Christchurch City Council (CCC) global consent. Operational stormwater from the roof will also need consent.

Minutes – Notes – Advice

- The applicant has acquired all of the land that the proposal will occur on, or the owners are on board and an agreement is in place.
- The current existing lots include lifestyle blocks and an onion farm.
- Note 14 Hasketts Road is not included in the proposal as it will become a temple.
- The site is currently zoned rural urban fringe.
- The proposal is that the lots will provide for general industrial activities.
- The applicant is proposing to supply reticulated services to the site including water supply, stormwater, wastewater and power supply.
- Stormwater from roads will be captured under the CCC global stormwater consent.
- It is intended that a stormwater basin, to be owned by CCC, will capture the first flush events prior to discharge. The basin will be constructed in the southeast corner of the site to utilise the current topography.
- The stormwater basins are designed to be dry approximately 12 hours after a rain event rather than retain water, ensuring birds are not attracted to the site, which is beneficial for the airport.
- Stormwater from roofs will discharge direct to ground as per a discharge consent.
- Groundwater has been assessed at 14 to 16 metres below ground level so there will be good separation at the site to allow for stormwater treatment.
- The applicant is not proposing dewatering nor the use of flocculant.
- There is a water race that runs parallel to Barters Road. Rather than adjoining sites having direct access from Barters Road, two culvert crossings are proposed.
- The two culverts to be constructed in the water race will meet the fish passage guidelines.
- There is also a non-active section of water race on site that will be filled in but this has been assessed as not an artificial watercourse. The only connection to the active Barters Road water race is at the bottom end of the channel but it is artificial and of very low value.
- The applicant is willing to send the watercourse assessment to CRC so that the science team can comment on the assessment.
- The site will be graded to capture stormwater runoff in the system rather than flowing directly into the water race.
- As mitigation for the short section of non-active water race, the applicant is proposing a building setback for the water race and planting the riparian margin. A five metre setback is proposed from the waterway and will be planted with indigenous vegetation from the CCC riparian planting list.
- During the terrestrial ecology assessment lizards were found on site so the ecologist is looking at creating a relocation plan.

- Shelter belts around existing lots will be removed but this will be offset with tree planting.
- The golf course is identified as a significant ecological area in the Christchurch District Plan (due to presence of a species of kowhai), albeit no works are proposed within this site.
- Significant earthworks will be required however the applicant will look to minimise these where possible.
- Earthworks will be undertaken with an Erosion and Sediment Control Plan (ESCP) & Dust Management Plan (DMP) in place.
- A contaminated land assessment is currently being undertaken. Nothing unexpected of the rural site has been found so far but if any contaminated hot spots are found these will be remediated prior to bulk earthworks beginning. The Detailed Site Investigation (DSI) can be provided to CRC once available.
- The applicant is already meeting with CCC to discuss the proposal and is meeting with the Department of Conservation (DOC) in the coming weeks prior to lodgement.
- The applicant has also engaged with Whitiara.

ACTION – Georgia to send through rules assessment for CRC to check and provide feedback

ACTION – Laura to send through watercourse assessment for CRC to comment on

ACTION – Georgia to send through ESCP & DMP for review if possible prior to lodgement

ACTION – CRC to supply a copy of the standard conditions

ACTION – David to type up meeting minutes

Additional Information

Charging: CRC to charge work prior to FTAA lodgement to pre-app code RMA254638.

Process: Applicant to pursue FTAA application.

Communication (going forward): Via email between Georgia and David.

Timelines for pre/ referral and substantive notification: Applicant hoping to lodge 13 June.

Signed by



David Sluter

Senior Consents Planner - Project Management Officer

Pre-Application Advice for Pound Road Industrial Development – RMA254638

Disclaimer: This technical advice note does not constitute legal advice and should not be relied upon as such. Please note this preliminary advice has been given prior to any official guidance from the Ministry for the Environment relating to CRC's role under the Fast-Track Approvals Act 2024.

Meeting Date:	07 July 2025
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Executive Summary

Ngai Tahu Property Development Holdings (NTP) (the applicant) have sought a meeting with Canterbury Regional Council (CRC) to discuss the potential option of using the Fast-Track Approval Act (FTAA) for the Pound Road Industrial Development Project. The project is listed in Schedule 2 of the FTAA.

CRC Staff – Anna Stewart, Joanne Mitten, Sam Prystupa and David Sluter (Consent Planning), Maiya Sadler (Contaminated Land), Georgia Simmonds (Compliance) and Isolina O'Brien (Planning)

APPLICANT – Georgia Brown (Novo Group) and Dean Christie (NTP)

Introduction

Fast-Track Act Consenting:

Under the FTAA, the applicant is required under section 11(1)(a) to consult with relevant local authorities. NTP will need to provide evidence of this consultation as part of their application.

This pre-application meeting forms part of this consultation and discusses the process going forward for any potential applications by NTP under the FTAA. This is the second meeting between the applicant and CRC after the meeting on 22/05/25.

Pound Road Industrial Development Project:

The applicant requested a pre-app meeting to discuss the proposed Fast-Track application. The project is to subdivide land and develop industrial lots (approximately 50 lots ranging between 2,000 square metres and 1.5 hectares, comprising approximately 84 lots across the full site) at or about 173 Pound Road, east of Barthers Road.

Minutes – Notes – Advice

CRC staff have raised the following concerns regarding this proposal:

Consents

- The planning assessment is very high level therefore it is hard to determine whether everything that is required is captured.
- Headings of the applicable RMA sections (9,15) and activity type with the cascading rules underneath would be more helpful for us to carry out our assessment.
- Will need to quantify the wetland as in this assessment it is unclear as to whether a wetland is present within the site. A wetland assessment would need to occur and then an assessment against the applicable higher-level documents would be required (NES-F, NPS-FM).
- We are uncertain that the discharge of scheduled contaminants to air would be a permitted activity under the Canterbury Air Regional Plan (CARP) due to the proposed size and nature of the works.
- We need an Assessment of Environmental Effects (AEE) in order to assess the effects and then understand the appropriate rules.
- Appropriate landowner approvals would need to be supplied as part of the application.
- Rūnanga consultation evidence and assessment against rule frameworks would be helpful for our assessment.
- Once a full application has been lodged, CRC will need to receive technical advice from internal science teams and from external consultants where we don't have the specialities in house.
- In the meeting it was mentioned that you will be basing your suggested conditions on CRC standard conditions. This is a good place to start, but it is likely that this site will require more site-specific conditions and mitigations once we understand the full proposal.
- It would be beneficial to have a discussion with relevant experts at CCC once the application has been lodged.

Planning

- The site is Zoned Rural Urban Fringe in the Christchurch District Plan and is classified as LUC 2.
- The planning assessment does not address the National Policy Statement for Highly Productive Land.

- As the draft CRPS has not been notified the draft Highly Productive Land maps have no legal effect.
- The planning assessment refers to a future assessment against the CRPS; this assessment should be completed and included at the time of lodgement.

Compliance

- No cut/fill plans provided, this limits the extent to which CRC can currently assess the practicality of the staging without understanding which stages will have deficit or excess of soil. It's noted that a cut/fill balance is provisionally expected across the site but stage by stage is not elaborated on.
- Limits proposed for area open at one time but stages have no areas listed to understand what might be open at any one time.
- Need a staging plan or methodology - "substages" mentioned in email but not yet provided or detailed.
- ESCP currently shows stabilised entrances where culverting and over pumping is planned for the race, this requires checking and explanation as to how this would occur.
- Multiple soak pits proposed but large areas of open excavations would require detailed size calculations. It was questioned why SRP's were not being considered to manage construction phase stormwater? 60 ha is a huge area to manage construction phase stormwater for and even with limits of 5ha open at any one time – our ESC toolbox states that "They are the most appropriate control measure for catchments greater than 0.3 ha." SRPs have a catchment area maximum of 5ha. Soak pits have significant limitations when it comes to larger volumes of water, particularly if the soakage rates are exceeded by the volumes of water getting directed to them. If there is no established outlet point, or emergency spillway as in a SRP then when overwhelmed there will be large volumes of sediment laden water that has not had any treatment or chance for sediment to drop out of suspension. Batters can erode and or collapse which is even less controllable when there is no clear outlet point for water to go.
- It appears soak pits are proposed adjacent to site entrances with cut off drains indicated to cross the stabilised entrances – CRC is concerned that this will not work to have a cut off drain crossing a "stabilised entrance" and having soak pits adjacent to entrances could cause stability issues in heavy/persistent rain.
- Silt fence noted to wrap around stage 1 – CRC staff are querying why this is needed and what is the risk that a silt fence is protecting against? If it is to prevent run-on water, or retain water within the boundary of the stage why not

consider a bund? That is a huge length of plastic fencing otherwise that needs maintenance and repairs.

- Clarification is required to determine if grey arrows indicate traffic flow or water flow direction.
- Construction of a sediment pond and outlet is mentioned in section 5 of the EMP but no outlet is mentioned anywhere else as only soakage is referenced.
- Please clarify when it states “Proposed stormwater basins for the development are not to be used for storing or soaking construction phase stormwater” but it appears temporary soak pits are located within these areas in lot 200 and 201.
- EMP does not show contaminated areas or include the remediation prior to bulk earthworks within the construction sequence - If all contaminated areas are proposed to be remediated at once prior to bulk works then there is a significant area of exposed land not within sequence.
- There are currently no reticulated services available to the current properties (see figure below) which indicates the presence of both consented and potentially unconsented on-site wastewater systems, disposal fields and drinking water bores. On-site wastewater systems will have contaminated the land and this is not included in the DSI. No information is provided as to what is proposed to happen with the bores or the systems.

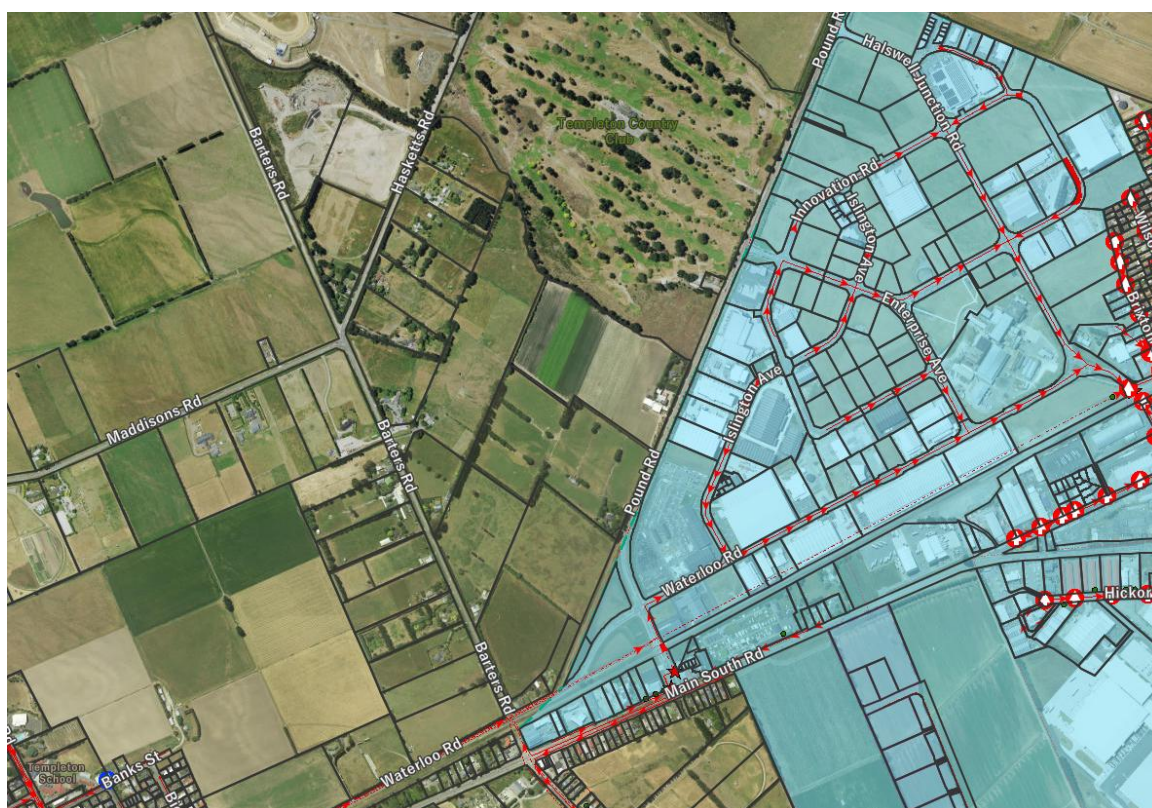


Figure showing wastewater connections near the site, note there are no laterals to service the previous and current land users or the proposed subdivision.

- Are bores on site proposed to be decommissioned?
- Removal of on-site wastewater infrastructure?
- Planning assessment contains conflicting information regarding the presence of wetlands (some state yes while others state no)
- No culvert installation methodology provided



Figure showing water races near the proposed industrial subdivision.

Water Ecology

- The internal water race has low ecological value, and it is considered that the loss of this section will not have a measurable impact on the ecology of the connected water races. However, a fish salvage should still be undertaken prior to the works to ensure any fish are moved out of the area of works.
- It is considered the proposed 5m setback along the Bartera Road water race is appropriate if stormwater is prevented from entering the water race.
- An erosion and sediment control plan to manage stormwater and overland flows should be developed for the construction phase (until the stormwater infrastructure is in place).
- The installed culverts must be consistent with the updated New Zealand Fish Passage Guidelines. Reach isolation and a fish salvage will be necessary for this. Works will need to be done in such a way to not create sediment discharges into the water race.

Contaminated Land

- The investigation references separate contamination investigation reports for some of the addresses in the development area however none were provided to CRC to review.
- 2 Barters Road had a pit identified with some concrete blocks. It was proposed that the unexpected contamination discovery protocol could manage the pit, however it is best practice to investigate the pit and determine if remediation is required. This would not constitute unexpected contamination as it was identified in the reporting as contaminated.
- The bund at 94 Barters Road returned a positive bulk asbestos laboratory test. This area should be investigated further and remediated/managed appropriately.
- It was recommended that 111 Pound Road and 40 Hasketts Road have a site inspection to determine if a DSI is required. As there were identified HAIL activities at 40 Hasketts Road, the need for a DSI is likely. There were a few properties in the proposed development area that were not able to be investigated or have site inspections by the contaminated land SQEP, deeming the investigation inadequate under the contaminated land management guidelines (MfE, revised 2021).
- The potential for HAIL E1 was ruled out due to no observations of asbestos containing material in a deteriorated condition, however there wasn't substantial asbestos in soil testing to make this determination. All historical buildings with potential ACM and lead-based paint products were not investigated for these contaminants of concerns.
- Some areas, particularly soil underneath burn piles was not accessible for the XRF at the time of testing. These areas need to be investigated further.
- The concerns could be worked into the conditions of the consent and were mostly raised in the report too. This indicates some understanding that more investigation is required prior to a finalised RAP. This would also inform more robust and enforceable conditions.

Please note we have yet to engage feedback from Land Resources, Land Ecology and Water and Groundwater Quality.

Initial pre-lodgement consultation meeting for Pound Road Industrial Development

Attendees:

Asher Cook – DOC

Dean Christie – Ngāi Tahu Property

Georgia Brown – Novo Group

Samantha King – Wildlands

Date: 17/6/25

Meeting summary

The Applicant's ecologist gave a summary of the lizard surveys completed:

- The site is flat and predominately covered in pasture and cropland.
- Southern grass skinks (At Risk – Declining) were confirmed. No other species have been confirmed so far.
- Surveys were not completed at the following properties (no access was available) – 111 Pound Road, 14 Hasketts Road, 40 Hasketts Road, 2 Barters Road and 7 Pound Road. These are likely to contain lizard habitat and therefore will require lizard management.
- The Ecologist expects a total of 650 – 670 Southern Grass Skinks to require relocation.
- A relocation site has been identified (a wetland area on the Templeton Golf Course)
 - Agreement from the Christchurch City Council is still required.
- Lizard surveying is yet to be completed at the release site
 - This is planned for early spring
 - Artificial Cover Objects will be used.
- On-site remediation is planned to create habitat connectivity.
- A lizard management plan is currently being prepared for the site in order to address potential adverse effects from site development.

The applicant was provided with the following guidance on applying for Wildlife Approvals under the Fast-Track Act: [Guidance for applying for a wildlife approval](#).

Asher Cook
Senior Permissions Advisor
Te Papa Atawhai | Department of Conservation
PO Box 10 420
Wellington 6143

8th July 2025

RE: Review of lizard management documentation for a Fast-Track Application for an Industrial Development at Pound Road, Christchurch

The Department of Conservation has engaged Kūkūwai Consulting Ltd to undertake a technical review of an Assessment of Ecological Effects (AEE) and a Lizard Management Plan (LMP) that have been prepared by Wildland Consultants Ltd, on behalf of the Applicant NTP Development Holdings Limited. The review of the AEE focused on sections that were relevant to indigenous lizards only, as this report contains information on the identification of lizard values, lizard survey methods, survey results and recommendations. These sections informed the LMP (still in draft stage), which has been developed specifically to address and manage adverse ecological impacts associated with lizard fauna within the project area.

This review seeks to evaluate the proposed lizard management strategy within the context of best practice requirements in accordance with the Department of Conservation's Key Principles for Lizard Salvage and Transfer (DOC, 2019)¹. The review also evaluates whether the proposed management strategy is in-line with DOC's recommended approach to tailor mitigation activities (plus offsets and compensation) to achieve a 'No-net-loss' of lizards (DOC, 2018)². Each (relevant) section of the AEE and LMP has been reviewed and evaluated against a suite of criteria that are provided alongside this memo in spreadsheet format, labelled as 'LMP Checklist_Pound Road'.

The format of this memo combines the lizard assessment, survey and management planning information from both reports and provides a brief overview and commentary of the following assessments and/or management activities:

- Desktop and field surveys
- Assessment of effects
- Discussion of the effects management hierarchy
- Proposed mitigation strategy
- Identification and justification of an appropriate lizard release site
- Identification of risk and contingencies
- Inclusion of additional mitigating activities
- Additional information to request from the Applicant's Specialist

¹ Department of Conservation Lizard TAG (2019). *Key principles for lizard salvage and transfer in New Zealand*. Department of Conservation Lizard Technical Advisory Group publication, Department of Conservation, Wellington, New Zealand. 23 pp

² Department of Conservation Lizard TAG (2018). *Guidelines and model for producing management plans for New Zealand lizards*. Department of Conservation Lizard Technical Advisory Group publication, Department of Conservation, Wellington, New Zealand. 8 pp

Desktop and field surveys

A comprehensive desktop assessment was made during the AEE stage of planning. Appropriate species were identified with a reasonable limit of 20km and 20 years for Bioweb Herpetofauna Database records. A likelihood of presence assessment was made regarding each species, with a good explanation to support the assessment. This was followed by a robust field survey that was undertaken late in the approved lizard survey season (late April – early May), which was acknowledged as potentially having an influence on survey results. Survey devices were deployed intensively throughout a range of habitat types across accessible properties within the project area, with the required six-week settle-in duration of equipment observed. Inspections of survey devices were undertaken on six occasions during good weather conditions as would be expected.

Results are discussed in terms of the significance of the population of Southern grass skink (*Oligosoma* aff. *polychroma* Clade 5; At Risk-Declining) with recommended management outlined within the AEE and developed in the LMP.

Assessment of Effects

The potential effects of development activities on lizards are correctly identified, although important impacts pertaining to competitive pressures (within and between species) are omitted from the list and discussion in the AEE. With several hundred lizards potentially being moved into adjacent habitats that will be subject to on-going restoration disturbance for at least five years, competitive impacts should be acknowledged.

The effects management hierarchy is discussed in Section 6 of the LMP, acknowledging that avoidance measures will not be possible for this project. To minimise impacts associated with the project, an on-going site management regime is recommended to ensure that lizard values do not increase through the site. Suggestions to ensure that intensive grazing is sustained are sensible given the potential for lizards to rapidly increase in range if grasslands become rank. Overall, the assessment of the range and level of effects are appropriate and consistent with the assessment framework as per the Ecological Impact Assessment (EcIA) guidelines (EIANZ, 2018) used by New Zealand consultants.

Management of Effects

Lizard salvage: tools and methods

The LMP provides the proposed strategy to mitigate the impacts that are identified within the AEE. A robust lizard salvage is the main activity proposed. The results of the baseline survey have informed an assessment of lizard numbers that may be salvaged from each of the sites within the entire project footprint, noting a conservative approach has been taken for estimates where surveys were unable to be undertaken (due to access constraints). Lizard salvage effort is clearly defined within parameters for the number of devices to be used, duration of trapping and manual search hours. Trap intensity is defined at 5-10m spacings which is appropriate to ensure that a device is placed within the home range of each lizard within a habitat. The trap types proposed are appropriate and reference the approved and standardized monitoring document used by herpetologists. Overall, the description of the tools that will be used to salvage lizards and the methods described to ensure they are being applied appropriately are suitable for the species and the site. Additional considerations that have been identified appropriately within the LMP include seasonal and climatic constraints to ensure that lizards are not salvaged outside of the approved October – April timeframe or during poor weather conditions that would reduce detectability.

Lizard release: site selection

The proposed release site is in the adjacent Templeton Golf Club, comprising a 2.2ha area of unmaintained weedy habitat. Table 6 of the LMP identifies each of the criteria that must be met in order for a release site to be considered as suitable. In general, the proposed release site is a good option as it does fulfill several criteria and activities can be undertaken to address those that it does not fulfill. A good level of detail is provided regarding the activities to bring this site in-line with requirements; namely, predator management, pest plant management, enhancement planting with lizard friendly species and the construction of a comprehensive network of refuge stack made from woody debris and rocks. At this stage, a baseline survey is scheduled for Spring 2025 to determine if Southern grass skink is present within the proposed release site and at what estimated density. These findings will determine if an alternative release site is required. It is noted that the release site must be agreed upon by Christchurch City Council, as the golf club lease the land off them. A memorandum of understanding has been suggested between council and the golf club, and this will need to be confirmed as a requirement of the fast-track approval process.

Three alternative release sites have been identified: [REDACTED] The LMP proposes to use one or more of these sites in the event that i) Templeton Golf Club site-preparation has not been completed and salvaged lizards from Year 1 require an alternative site, ii) If resident lizards at the golf club are likely to exceed high density and consequently cannot support more lizards, or iii) if lizard capture numbers exceed the receiving capacity of the golf club. The LMP acknowledges the three alternative sites have differing carrying capacities and enhancement requirements but does not expand upon what is needed, or how many additional lizards could be supported within the context of existing lizard communities and their available resources. This is considered as a critical information gap in order to assess the suitability of these alternative sites if required for use.

Risks and Contingencies

A range of risks are clearly identified and appropriate associated contingency actions presented. Solutions include an Incidental Discovery Protocol, extensions to trapping efforts, intensification of predator control and modifications to the release site. Report updates may be required if an alternative release site is required, pending the results of the baseline survey at Templeton Golf Club.

Additional Mitigation Activities

Additional activities to monitor lizard establishment, pest animal suppression and planting establishment are described with key objectives identified to determine whether salvage and restoration efforts have been successful. These are good solutions to the usual challenges associated with post-salvage monitoring. In general, lizard monitoring programmes should be flexible, adaptive and closely tied in with salvage outcomes to ensure that objectives and benefits are appropriately balanced against impacts.

Additional information to request from the Applicant's Specialist

1. Can Table 7 of the LMP be expanded upon to include when lizard salvage will commence within the context of release site restoration efforts (i.e., Year zero, year one, year two etc.).
2. Please provide further details regarding how resident lizards at the release site will be protected from impacts (disturbance and habitat reduction) associated with pest plant management that will remove c.0.82ha of weedy habitats within the 2.2ha release area.
3. Please provide an estimate of 'very high density' populations that would render Templeton Golf Club unsuitable to receive hundreds of additional lizards (i.e., estimates of 500+, 1000+ etc).
4. Herbicide impacts remain largely unstudied with respect to indigenous lizards, and consequently application should avoid the potential to overlap with lizard foraging and activity. It is recommended that herbicide application timings be reconsidered with a preference to application during overcast, warm conditions (with a

slight breeze) that avoid the peak activity times of lizards. This will reduce the likelihood of lizards coming into contact with herbicide on foliage, and a light wind will speed up drying time.

5. Please provide further information regarding the staging of rock and wood stack refuges. Table 7 shows that rock and wood piles for all stages of salvage will be constructed in a single event prior to Year Zero. Please clarify whether additional refuges will be constructed each subsequent year of salvage in order to facilitate the release of each group of 5-10 lizards salvaged into refuges that are free of resident competitors.
6. Please provide confirmation that Christchurch City Council and Templeton Golf Club approve the proposed release site and corresponding activities (pest plant control, pest animal control, enhancement planting and maintenance for five years).
7. Release site alternatives: Please provide additional detail for each of the suggested alternative locations for release: Kowhai Grove, Kowhai Solar Farm and Weedons Ross Road.
 - a. Please expand Table 6 or provide additional tables to demonstrate how each alternative site fulfills the release criteria based on Principle 6 of DOC's salvage guidelines.
 - b. Please provide an estimate of lizard numbers that each site could potentially receive if they are required
 - c. Please provide a map of each alternative site.
 - d. Please provide confirmation that landowner approval can be obtained for each site.
 - e. Please provide details of additional mitigation that would be required to bring each site in line with requirements (i.e., predator control, pest plant management, enhancement planting, additional refugia).

Conclusions and general comments

The lizard survey and corresponding management plan prepared by Wildland Consultants for the Pound Road Industrial Development project provides a high level of effort, consideration and detail that are consistent with the expectations and requirements of DOC's guidelines for this type of specialized ecological work. The baseline survey was robust, despite being undertaken at the very end of the approved season. The subsequent recommendations for management provide a well-considered approach that provisions for the relevant species detected and describes a salvage approach that is appropriate in terms of methods, tools, duration and intensity. Several detailed tables provide clear parameters for a range of assessments regarding habitat suitability, impact to lizards, prescribed effort level, risks and solutions.

The key information gaps are around the proposed releases site(s) and their capacity to receive additional lizards. There remains a level of uncertainty around whether Templeton Golf Club is suitable to receive up to 650 additional lizards, and this information will not be available until baseline surveys are completed, likely October or November 2025. Consequently, the high-level overview of the alternative release sites does not contain sufficient information to make a well-informed assessment of suitability. Therefore, the same level of detail should also be provided for the three contingency sites. Confirmation of landowner approval must also be demonstrated for all four proposed release sites.

It is anticipated that once the above questions and information gaps are addressed that this LMP will provide enough detail to complete the assessment in accordance with fast-track legislation requirements. Thereafter, it is considered that this LMP will appropriately mitigate impacts to lizards in accordance with best practice objectives and guidelines.

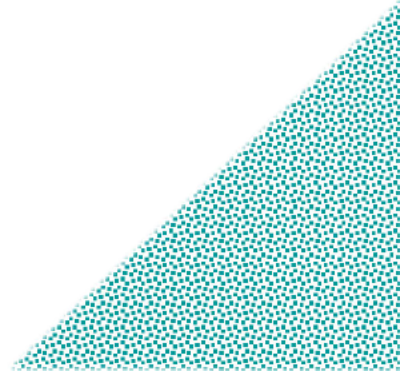
For any further questions regarding this review, please do not hesitate to contact me.



Kind regards,



Jacqui Wairepo
Director | Herpetologist
Kūkūwai Consulting Limited



NZ Transport Agency Waka Kotahi Reference: Fast Track Pre-Application Comments-Ref 2025-670

9 July 2025

Jeremy Phillips

Sent via Email: jeremy@novogroup.co.nz

Dear Jeremy,

Pre-Application Comment. Ngai Tahu, Proposed Fast Track Application – Pound Road Industrial Subdivision / Development

Thanks for the opportunity to engage with your team on this project. A project with the potential to make a substantial contribution to the expansion of industrial capacity in the Christchurch region.

It was good to sit down with your team, albeit virtually, to address points raised in NZTA 's preliminary memo and explore our common ground and differences of opinion. What quickly became apparent was that your team had little disagreement with the wider implications of the project raised in our memo and were focussed on mitigations for effects pertaining to the Pound Rd / State Highway 1 intersection. Reflected also in your emailed summary of your perspective of outcomes from our meeting of Thursday 19th of June.

On the broader transportation effects of the project, it is our intention is to share these with our Christchurch City Transportation counterparts as many of these are relevant to their sphere of operations.

To turn now to the meeting outcomes pertaining to the Pound Rd / SH 1 as reported by you in your email of 27th June 2025. I have addressed these by interleaving our responses point by point. (In italics)

1. We understand that the issue of relevance for NZTA is the performance of this intersection and the extent to which traffic from the proposal (estimated to be 856 vehicle movements per hour in the AM peak, 780 vehicles per hour in the PM peak and 9,736 vehicles per day) will affect its safe and efficient operation.

NZTA in its wider role as provider and part funder of safe and efficient NZ road transport networks affirms all points raised in our memo as being of relevance in the context of this application. Including the safe and efficient function of the Pound Road / SH 1 intersection.

2. As discussed, traffic modelling has been undertaken by QTP Limited as part of Novo Group's transport assessment for the application and in order to understand the existing operation of the network and the performance of the network in 2038 without the development (baseline) and with the development. The modelling indicates that existing queuing on the Pound Road approach to SH1 across the rail corridor affects the capacity of the Pound Road / Waterloo Road signals, and as described by Mr. Fuller at the meeting this is an existing safety concern that currently warrants consideration of an upgrade. We understand from James that NZTA acknowledge this.

NZTA acknowledge there are reports of queues extending across the level crossing. This is caused by both the NZTA and CCC intersections. NZTA did not state / acknowledge that the intersection of SH1 / Pound Rd warrants an upgrade at this time. I refer back to the NZTA memo on suggested improvements to the applicant's traffic modelling and design detail to better understand the transportation issues at this intersection.

3. The modelling also indicates that in 2038 (without the development), this intersection will be operating with further delays, with a Level of Service (LoS) E in the AM peak and D in the PM peak. Therefore, the development and associated increase in traffic generation will further impact on this existing issue.

Mr. Fuller noted that to address existing and future capacity and safety concerns, an additional right turn lane from Pound Road to SH1 and an additional southbound lane on Pound Road to Waterloo Road would be required. It was also clarified that no additional lanes are required on SH1 itself, as the additional Pound Road lanes provide sufficient additional capacity at the intersection as a whole.

We noted that it is unclear when exactly (between now and 2038) this upgrade would be required, but in order to provide sufficient time for NZTA to plan, fund and implement the upgrade, a consent condition is to be proposed (volunteered) as part of the Fast Track application that precludes the issuing of titles for any lots within the development until 31 December 2027 in order to sufficiently delay subsequent site development and traffic.

NZTA emphasised that the general principle underlying its standard practice in these circumstances is for the developer to mitigate effects generated by its proposal. As such the abovementioned condition is not fit for purpose. Furthermore, while avenues exist within the NLTP, and RLTP framework for the applicant to advance the case for intersection upgrades there is currently no way for NZTA to prioritise any upgrade within the time frames anticipated by the condition.

4. We understood (from James), that the additional right turn lane from Pound Road to SH1 and additional southbound lane on Pound Road to Waterloo Road could be implemented within the boundaries of the designation and land owned by NZTA / Council (no land acquisition or designations required), and therefore this design solution should be relatively easy to implement, and therefore timing and funding are the key issues from NZTA's perspective.

This assumption is based on the plan provided by Novo group – NZTA has not independently verified that sufficient room exists within current road boundaries for the required intersection upgrades. Furthermore, the plan provided does not actually show it is possible to accommodate two vehicles tracking side by side in the intersection area which would be critical to the proposed layout actually functioning and mitigating any effect,

5. In terms of timing, we understand NZTA wants to ensure that any design solution can be implemented within an appropriate timeframe, accounting for when the development will generate traffic. We understood from James that the proposed delay to the issue of titles (as noted in the condition described above) was likely to be sufficient for NZTA.

James stated that NZTA could not undertake any design in this NLTP (2024-2027). There followed some discussion around the rate of development and that development wasn't likely to be complete / at 100%, until around 2038. NZTA considers that the title issue time frame is unworkable without some constraint built into it via an acceptable side agreement between the Developer and NZTA to link site use and development to the funding and implementation of any required intersection upgrade.

6. In terms of funding, we understand that NZTA want to ensure that the developer/applicant (NTP Development Holdings Limited) pays its appropriate share of costs for mitigating its impacts on this intersection. We noted that as this intersection requires an upgrade irrespective of this development, the principal cost imposed by the applicant would be the potential bringing forward of works that might not otherwise be required until 2038 (at the latest) and that this entails a financing cost (in terms of the cost of bringing forward funding).

Based on NZTA comments on points 3 to 5 above, NZTA is not in agreement with the inferences made and conclusions drawn in this comment.

7. Other parts of the road network (beyond the State Highway and intersection noted above) are within the jurisdiction of the Council and in that regard, the applicant has engaged / is engaging with Council transport staff on the relevant matters.

Noted

8. Any additional upgrade works at the Pound Road /SH1 intersection (e.g. a fourth arm to service development to the south), is uncertain and speculative at this time.

Agreed

9. KiwiRail interests in this intersection and their rail corridor should be addressed directly to/with KiwiRail.

Agreed, noting contact details for KiwiRail have been passed to Nick Fuller – Novo Group

Conclusion

Once again, thank you for the opportunity to have some early input into this significant proposal. We hope that the input offered will be of assistance in optimizing your proposal and mitigating any potential adverse transport related effects on the Christchurch transport network.

However, to do so, the developer must mitigate the adverse transport effects generated by the development. In the absence of any wider programmed upgrade works at the Pound Road / SH 1 intersection, for the foreseeable future, any intersection upgrade or part thereof, necessary to mitigate the effects of the development, is the financial responsibility of your client.

If you have any queries regarding the above or wish to discuss matters further, please feel free to contact the Environmental Planning team at environmentalplanning@nzta.govt.nz.

Yours sincerely,

B.W.Hawkins

Bruce Hawkins

Senior Planner

Poutiaki Taiao / Environmental Planning, System Design, on behalf of NZ Transport Agency Waka Kotahi.

Enclosed:

- Attachment 1: Initial NZTA Commentary
- Attachment 2: Applicant Response

Attachment 1 Initial NZTA Commentary

NZTA SME input: Pound Road Fast Track – Application. 16/06/2025.

Produced for the purposes of Client Consultation – not for general distribution.

A. Overview Considerations

1. This proposed development needs to mitigate the issues it will either create or significantly worsen at the intersection of SH1 and Pound Road.
2. Pound Road a busy component of the local transport network intersecting with three key strategic corridors SH1, Waterloo Road, Rail Corridor – all of which are sensitive to the traffic implications of this project.
3. Pound Road is crucial to movement along the western fringe of Christchurch, and increasingly used (as seen by counts) including many trucks all the way to Sawyers Arms.
4. I am not convinced that CCC fully appreciate this significance and may not be protecting the throughput as well as they should.
5. Freight efficiency is a key government objective, and the suggestion of a roundabout (on Pound Rd) to reduce the sites exit delays has a much bigger "environmental effect" on freight users. (do their benefits outweigh the additional 15-30 seconds delay for other users, including freight on Pound Road?)
6. Not forgetting risks of other downstream impacts on rail crossings and SH intersections.
7. If a roundabout is agreed it needs to be big for efficient freight, example below further along Pound Road (Buchanan Road).
8. Interestingly the other intersection accesses into Islington Industrial are all priority controlled but they will presumably reach a time for upgrade.
9. Multiple intersections on Pound Road will degrade the wider efficiency
10. There is a longer-term plan to have a fourth leg at Pound/SH1 into the Hornby industrial development
11. Pound Road also performs a valuable by-pass role when other elements of the network are under pressure.
12. We know that SH1 at this intersection is constrained by land boundaries and there is no room for widening of SH1.
13. Concerned that concept design in Attachment 3 will not work due to this constraint.
14. Concerns with the proposed two right turn lanes out of Pound Road for side-by-side truck movements. (or even the lesser car and truck side by side) It may not be a solution and queuing back over the rail level crossing will be a serious safety concern.
15. The need for the applicant to include KiwiRail in this proposal given the complex interactions between the 3 Pound Road intersections, Waterloo, Railway, State Highway 1. (Queuing across intersections, lane provision, signal interaction effects on network safety and performance)
16. Changes to phasing is the only solution available for Right Turns from SH1 to Pound Road, this has potential flow on affects.

B Transportation Planning / Network Performance

1. SH1 / Pound Road Intersection Performance
 - I. The SIDRA outputs cover multiple sites and scenarios, including current and 2038 projections.
 - II. Without improvements, the SH1/Pound Road intersection shows deterioration to LOS D/E/F, particularly for right-turns from side roads. E.g., the right turn from Pound Road to SH1 in the AM peak hits 395 seconds delay, LOS F.
 - III. With intersection upgrades (e.g. additional turning lanes and a roundabout), LOS improves to B-C across most approaches, with right-turn delays reducing to 12-14 seconds.
 - IV. Opportunity for sensitivity analysis in the modelling
 - V. SIDRA confirms that intersection upgrades are essential to achieve acceptable performance.

2. Truck Turning Geometry and SH1 Layout Concerns
 - I. While the modelling highlights delay and LOS, it does not include any assessment of vehicle tracking or side-by-side heavy vehicle turning feasibility.
 - II. Attachment 3, which includes layout point, doesn't show turning paths or verify if large vehicles (e.g. semi-trailers or B-doubles) can safely perform movements at the SH1/Pound Road intersection given the industrial nature of the development.
 - III. We have had a few issues with trucks turning left into Pound Rd from SH1. The current width is not sufficient to clear the TS infrastructure with poles being hit on numerous occasions. Consideration of this issue needs addressing when the extra RT lane is added.
 - IV. I recommend including a vehicle tracking assessment to ensure operational functionality and safety under heavy vehicle demand.
 - V. Over dimension truck loads
 - VI. With the additional right-turn lane, is there still an opportunity for a left-turning vehicle to proceed simultaneously? Currently, the phasing allows the left turn to run at the same time as the right turn out. Not allowing the LT to run at the same time as Pound Road would reduce the LOS for the LT.
 - VII. With the additional width required (for the new lane), are we still able to accommodate the cycle lanes?
 - VIII. What happens when the fourth arm gets built on Pound Road? With a dual right-turn lane, we will need to operate the Pound Road approaches as split approach phasing, which is very inefficient. This would likely increase the delay significantly.
 - IX. What happens if/when? Pound Road is converted to be the state highway? This would have a significant impact on traffic volumes.
 - X. Also, what happens if the light rail/bus rapid transport goes ahead and the section of road at Homby Mall is closed to through traffic? This would shift more traffic onto Pound Road. I'm not sure how likely this is, but I know it is being looked into.
 - XI. I would be interested to know what happens to the Pound/Yaldhurst roundabout, as I know that it currently has large queues. More traffic on here might push this over its capacity and require signalising?
3. Rail Level Crossing Safety
 - I. Section 3.5 notes queueing over the railway crossing (up to 225m), and the memo flags this as an existing safety concern.
 - II. However, the report does not quantify how queueing will worsen post-development nor propose any specific mitigation.
 - III. SIDRA data shows 95% queues > 100m on some approaches (such as Pound Road RT Lanes), reinforcing the potential for spillback over the rail.
 - IV. I would suggest assessing the risk at level crossing, considering its proximity (within 100m) to SH1. This should include engagement with KiwiRail and propose mitigation measures.
4. Trip Distribution
 - I. The trip distribution is based on similar zones (e.g. Waterloo Park), but it is unclear how comparable these are in terms of land use types, operational profiles, or heavy vehicle intensity.
 - II. The 2:1 PCU assumption for HCV is standard. Slight changes in heavy vehicles assumptions can have big impacts on LOS, especially at constrained intersections. If the Fast Track site has more logistics-based tenants, the peak hour HCV percentage would exceed estimates, invalidating the intersection performance claims.
 - III. Suggest including considering higher HCV volumes, especially during peak hours.
5. Wider Network Impacts and Residual Congestion

- I. The modelling suggests SH1 west of Pound Road will exceed capacity by 2038, even with the proposed improvements.
 - II. There is potential for congestion to back-propagate into the site, particularly at SH1 / SH76 and SH1 / Waterloo.
 - III. Pound Road / Waterloo, SH1 / Pound Road, and the rail crossing are functionally interdependent. Queueing at one intersection will likely influence operations at the other intersections.
 - IV. I recommend analysing signal phasing integration and blockage effects more holistically and consider residual queueing effects on internal site access and egress points.
6. Resilience of Access and Incident Response
 - I. SH1 is a critical freight and regional route. Alternative routes (e.g. Pound Road or Waterloo) are limited by geometry and rail conflict.
 - II. In the event of incidents or maintenance on SH1, lack of detour options could lead to delays, particularly if the project adds further volume to this corridor.

Bruce Hawkins
Senior Planner
Environmental Planner

Attachment 2 Applicant Response

RE: Pound Road Fast Track Consent - Meeting re NZTA matters



Bruce Hawkins

To: Jeremy Phillips
Cc: Nick Fuller; James Long

Pound Road Final Input Letter.docx
75 KB

To: Bruce Hawkins <Bruce.Hawkins2@nzta.govt.nz>; James Long <james.long@nzta.govt.nz>
Cc: Georgia Brown <Georgia.Brown@novogroup.co.nz>; Nick Fuller <nick@novogroup.co.nz>; Dean Christie <dean.christie@airlinetia.mt.nz>
Subject: Pound Road Fast Track Consent - Meeting re NZTA matters

Some people who received this message don't often get email from jeremy@novogroup.co.nz. Learn why this is important.

Hi Bruce and James

Thanks for your time last Thursday (18 June) regarding the Pound Road Fast Track Consent application and the matters of relevance to NZTA and in particular, its management of the Pound Road / State Highway 1 intersection.

We understand that the issue of relevance for NZTA is the performance of this intersection and the extent to which traffic from the proposal (estimated to be 855 vehicle movements per hour in the AM peak, 780 vehicles per hour in the PM peak and 9,736 vehicles per day) will affect its safe and efficient operation.

As discussed, traffic modelling has been undertaken by QTP Limited as part of Novo Group's transport assessment for the application and in order to understand the existing operation of the network and the performance of the network in 2039 without the development (baseline) and with the development.

The modelling indicates that existing queuing on the Pound Road approach to SH1 across the rail corridor affects the capacity of the Pound Road / Waterloo Road signals, and as described by Mr. Fuller at the meeting this is an existing safety concern that currently warrants consideration of an upgrade. We understand from James that NZTA acknowledge this.

The modelling also indicates that in 2038 (without the development), this intersection will be operating with further delays, with a Level of Service (LOS) E in the AM peak and D in the PM peak. Therefore, the development and associated increase in traffic generation will further impact on this existing issue.

Mr. Fuller noted that to address existing and future capacity and safety concerns, an additional right turn lane from Pound Road to SH1 and an additional southbound lane on Pound Road to Waterloo Road would be required. It was also clarified that no additional lanes are required on SH1 itself, as the additional Pound Road lanes provide sufficient additional capacity at the intersection as a whole.

We noted that it is unclear when exactly (between now and 2038) this upgrade would be required, but in order to provide sufficient time for NZTA to plan, fund and implement the upgrade, a consent condition is to be proposed (volunteered) as part of the Fast Track application that **precludes the issuing of titles for any lots within the development until 31 December 2027 in order to sufficiently deasy subsequent site development and traffic.**

We understood (from James), that the additional right turn lane from Pound Road to SH1 and additional southbound lane on Pound Road to Waterloo Road could be implemented within the boundaries of the designation and land owned by NZTA / Council (no land acquisition or designations required), and therefore this design solution should be relatively easy to implement, and therefore timing and funding are the key issues from NZTA's perspective.

In terms of timing, we understand NZTA wants to ensure that any design solution can be implemented within an appropriate timeframe, accounting for when the development will generate traffic. We understood from James that the proposed delay to the issue of titles (as noted in the condition described above) was likely to be sufficient for NZTA.

In terms of funding, we understand that NZTA want to ensure that the developer/applicant (NTP Development Holdings Limited) pays its appropriate share of costs for mitigating its impacts on this intersection. We noted that as this intersection requires an upgrade irrespective of this development, the principal cost imposed by the applicant would be the potential bringing forward of works that might not otherwise be required until 2038 (at the latest) and that this entails a financing cost (in terms of the cost of bringing forward funding).

To the extent that other issues were discussed at the meeting:

1. Other parts of the road network (beyond the State Highway and intersection noted above) are within the jurisdiction of the Council and in that regard, the applicant has engaged / is engaging with Council transport staff on the relevant matters.
2. Any additional upgrade works at the Pound Road SH1 intersection (e.g. a fourth arm to service development to the south), is uncertain and speculative at this time.
3. Kiriwai's interests in this intersection and their rail corridor should be addressed directly to Kiriwai.

We would be grateful for your confirmation that the record above accurately reflects the matters discussed and agreed at the meeting and that this covers the principal issues of relevance to NZTA.

Please note that we are aiming to lodge the application with the EFA on the 11/07/2025, so we would appreciate a response prior to that date if possible.

Kind regards,

Jeremy

Jeremy Phillips

Director - Senior Planner

D: 03 365 5588 | M: 029 2811 310 | O: 03 365 5570

E: jeremy@novogroup.co.nz | W: www.novogroup.co.nz

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Tēnā koe Tallulah,

Pound Road Industrial Development – Pre-lodgement consultation under the Fast-track Approvals Act 2024 (FTAA)

Thank you for your correspondence dated 7 July 2025 in relation to Ngāi Tahu Property Development Holdings intention to lodge a substantive application for a listed project under the Fast-track Approvals Act 2024 (FTAA) in respect of the Pound Road Industrial Development project.

As you are aware, the Ministry for the Environment (the Ministry) is the “relevant administering agency” for approvals relating to the Resource Management Act 1991 (RMA) and Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (EEZ Act) under the FTAA.

We have received the information you provided on 7 July 2025. As part of your substantive application, you will need to provide an assessment of the project against any relevant national policy statement, national environmental standards and if relevant the New Zealand Coastal Policy Statement. The Ministry has prepared the following summary on the national direction made under the RMA, for your consideration.

National Direction

Under the RMA, the government can create national direction to support local authorities’ decision making under the RMA and develop a nationally consistent approach to resource management issues. This is typically done where an issue is of national importance, or involves significant national benefits or costs, or where necessary to give effect to other government policy or regulation. There are several types of national direction, including national policy statements and national environmental standards.

National Policy Statements (NPS)

National Policy Statements are instruments issued under section 52(2) of the RMA. An NPS is a vehicle for the government to prescribe objectives and policies for matters which are relevant to sustainable management. All National Policy Statements currently in force are published on the Ministry’s website and links are provided in the table below. It is recommended that you consider the relevance of each NPS to your project. If you are seeking an RMA approval, then under section 13(4)(y)(i) and schedule 5 paragraph 2 of the FTAA your application must include an assessment of your project against any relevant NPSs. Refer to the National Policy Statements linked below.

National Policy Statement	Description
---------------------------	-------------

National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023	This NPS provides nationally consistent policies and requirements for reducing greenhouse gas emissions from industries using process heat. It works alongside the National Environmental Standards for Greenhouse Gases from Industrial Process.
National Policy Statement for Highly Productive Land 2022	This NPS provides national direction to improve the way highly productive land is managed under the RMA. The objective is to ensure the availability of New Zealand's most favourable soils for food and fibre production.
National Policy Statement for Freshwater Management 2020	This NPS provides local authorities with updated national direction on how they should manage freshwater under the RMA.
National Policy Statement for Indigenous Biodiversity 2023	This NPS provides direction to local authorities to protect, maintain and restore indigenous biodiversity requiring at least no further reduction in indigenous biodiversity nationally.
National Policy Statement for Renewable Electricity Generation 2011	This NPS provides guidance for local authorities on how renewable electricity generation should be dealt with in RMA planning documents.
National Policy Statement on Electricity Transmission	This NPS sets out the objective and policies for managing the electricity transmission network.
National Policy Statement on Urban Development 2020	This NPS recognises the national significance of well-functioning urban environments. It removes barriers to development to allow growth in locations that have good access to existing services, public transport networks and infrastructure.
New Zealand Coastal Policy Statement 2010	The NZCPS provides guidance for local authorities in their day-to-day management of the coastal environment. The NZCPS is the only compulsory NPS under the RMA.

National Environmental Standards (NES)

National Environmental Standards are regulations issued under section 43 of the RMA. They prescribe technical and non-technical standards, methods or other requirements for land use and subdivision, use of the coastal marine area and beds of lakes and rivers, water take and use, discharges and noise. NESs require each local authority to enforce the same standard in respect of these areas unless otherwise specified. All National Policy Statements currently in force are published on the Ministry's website and links are provided in the table below. It is recommended that you consider the relevance of each NES to your project.

If you are seeking an RMA approval under the FTAA, section 13(4)(y)(i) and schedule 5 paragraph 2 require that an assessment of your project against any relevant NES must be included with your application. Refer to the National Environmental Standards linked below.

National Environmental Standard	Description
---------------------------------	-------------

National Environmental Standards for Air Quality	This NES prohibits discharges from certain activities and set a guaranteed minimum standard for air quality for people living in New Zealand.
National Environmental Standards for Commercial Forestry	This NES provides nationally consistent regulations to manage the environmental effects of forestry.
National Environmental Standards for Electricity Transmission Activities	This NES sets out which electricity transmission activities are permitted, subject to conditions to control environmental effects. They apply only to existing high voltage electricity transmission lines.
National Environmental Standards for Freshwater	This NES regulates activities that pose risks to the health of freshwater and freshwater ecosystems.
National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat	This NES sets out nationally consistent rules for certain greenhouse gas emitting activities from industrial process heat.
National Environmental Standards for Marine Aquaculture	This NES replaces regional council rules for existing marine farms and provides a more certain and efficient process for replacing consents, realigning farms and changing farmed species. In some instances, they allow regional council rules to remain in force.
National Environmental Standards for Sources of Human Drinking Water	This NES sets requirements to protect sources of human drinking water from becoming contaminated.
National Environmental Standards for Storing Tyres Outdoors	This NES provides nationally consistent rules for the responsible storage of tyres.
National Environmental Standards for Telecommunication Facilities	This NES sets national rules regarding the deployment of telecommunications infrastructure across New Zealand.
National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health	This NES includes requirements for assessing and managing potentially contaminated soil.

Please ensure your application includes a summary of this consultation with the Ministry, and an explanation of how this consultation has informed your project. This information must be included in your application, regardless of whether it is a referral application or a substantive application for a listed project.

Thank you for consulting with the Ministry for the Environment as the relevant administering agency for the RMA and the EEZ Act.

If you have any queries in relation to the FTAA process, please contact info@fasttrack.govt.nz for further assistance.

Ngā mihi,



Acting General Manager, System Enablement and Oversight

From: [Luc Le Roux](#)
To: [Georgia Brown](#)
Subject: Re: Paparua Water Race
Date: 01 July 2025 11:53:51
Attachments: [image003.png](#)
[image005.png](#)

Hi Georgia,

I confirm that SDC approves the installation of a new culvert over the water race.
Minimum size 450mm diameter and subject to CCC's vehicle crossing requirements + Ecan requirements/applicable consents.

Kind regards,
Luc

From: Georgia Brown <Georgia@novogroup.co.nz>
Sent: Tuesday, July 1, 2025 11:50 AM
To: Luc Le Roux <Luc.LeRoux@selwyn.govt.nz>
Subject: RE: Paparua Water Race

You don't often get email from georgia@novogroup.co.nz. [Learn why this is important](#)

Hi Luc,

I am the planner working with Todd on this project.

I understand based on the below that you are largely happy for the installation of the culverts? For completeness, so that we can advise CCC and ECan (who we are also in discussion with for the project), could you confirm that SDC approve the installation of the culverts, subject to meeting the below (min diameter of 450mm), and other standard procedures (ESCP, necessary ECan consents, fish salvage etc).

Kind Regards,
Georgia

Georgia Brown
Senior Planner

M: 021 193 6484 | O: 03 365 5570

E: Georgia@novogroup.co.nz | W: www.novogroup.co.nz

Level 1, 279 Montreal Street | PO Box 365 | Christchurch 8140

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From: Luc Le Roux <Luc.LeRoux@selwyn.govt.nz>
Sent: 01 July 2025 11:15
To: Todd Inness <Todd.Inness@dls.co.nz>
Cc: Surface Waters <SurfaceWaters@selwyn.govt.nz>
Subject: Re: Paparua Water Race

CAUTION: This email originated from outside of Davie Lovell-Smith. DO NOT click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Todd,

Correct, no water race closures will currently be accepted. Water race to remain.

Any new culverts over this specific race to be minimum diameter size of 450mm.

Of note: the men's prison above is undertaking expansion soon and this will include the realignment of the race throughout their site and the installation of new upsized culverts. May be beneficial to touch base with them so you could potentially align your works when the race is temporarily shut down. Fish survey and relocation/holding is a requirement so could also share this with them to save on costs and approvals.

Kind regards,
Luc

From: Todd Inness <Todd.Inness@dls.co.nz>
Sent: Tuesday, July 1, 2025 8:57 AM
To: Luc Le Roux <Luc.LeRoux@selwyn.govt.nz>
Subject: RE: Paparua Water Race

Morning Luc,

Following up on the below.
Would you please be able to come back to me?

Regards,

Todd Inness | Associate



116 Wrights Road, Addington, Christchurch | P (03) 379 0793 | M 027 213 9895 | www.dls.co.nz

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From: Todd Inness

Sent: Monday, 16 June 2025 2:22 pm

To: Luc Le Roux <luc.leroux@selwyn.govt.nz>

Subject: Paparua Water Race

Good afternoon Luc,

You may recall a discussion we had a while ago regarding a section of the Paparua Water Race along Barters Road (see snip below).

At the time you mentioned there was no intention of SDC to close this section of water race in the near future.

Would you please be able to confirm this is still the case?



Regards,

Todd Inness | Associate



116 Wrights Road, Addington, Christchurch | P (03) 379 0793 | M 027 213 9895 | www.dls.co.nz

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Luc Le Roux

Surface Water Environmental Engineer

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