

Your Comment on the Ryans Road Industrial Area Application

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	TWT Holdings Ltd C/- Aston Consultants Ltd Resource Management & Planning		
First name	Fiona		
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Email (a valid email address enables us to communicate efficiently with you)	██		

2. We will email you draft conditions of consent for your comment			
☒	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

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

TWT Holdings Ltd (TWT) owns and operates its consented¹ trucking (heavy truck and trailer cartage) and landscape supplies business from 614 Pound Road, located opposite the application site on the south east corner of Ryans and Pound Roads.

TWT is a member of the PRG Ltd (PRG) which includes owners of the properties shown on the map below (Fig 1). PRG was incorporated on 3 July 2024, with the intent of pursuing industrial rezoning of the land in Fig 1 i.e. properties on the east side of Pound Road, between Pound and Yaldhurst Roads, two properties 'deep' – 'the PRG Site'.

¹ Resource consents granted including variations are RMA2016/3080, RMA2017/2472 and RMA2018/2516.



Figure 1: TWT site (purple star), PRG site (outlined in red) and locality

The PRG Site contains a range of existing industrial activities including the TWT site, NZ Building Removals, contractors yards and engineering, firewood supplies and processing, and storage, as well as undeveloped rural land. These activities can be further developed, or resited where they are 'rural related', freeing up the land for 'higher order' industrial activities, including airport related.

The PRG Site, with frontage to Pound Road and immediate proximity to CIAL (Christchurch International Airport) is also ideally located for similar uses to those proposed by the Ryans Road application ie logistics, warehousing etc.

PRG has been actively working on a rezoning/industrial development proposal for the PRG Site and its consultants have prepared a draft Outline Development Plan (which can be supplied confidentially on request). It has held several consultation meetings with Christchurch City Council staff, most recently in July 2025. Servicing matters are currently being investigated. The PRB Site (34.5 ha) adjoins the Ryans Road site (55.5 ha) and the two sites jointly (89.5 ha) would be a regionally if not nationally significant industrial development.

As part of the Council consultation, Christchurch City Council planners have advised that they are progressing a West Christchurch Area Plan, which will consider industrial and residential rezoning of land generally west of Yaldhurst Road, south of Christchurch International Airport (CIAL) to SH1 and west to Pound Road and potentially further west. This is in response to a shortage of freehold industrial land and greenfield residential land in the City; remodelled airport noise contours; and recent direction (including in the Greater Christchurch Spatial Plan) that sensitive activities, including residential, are to be managed rather than avoided between the CIAL 50-55 dBA Ldn noise contours.

TWT supports the Ryans Road application to the extent that it agrees that there is shortage of freehold industrial land in the City and the West Christchurch area, in the Pounds Road vicinity, including the TWT and wider PRG Site, is an ideal location for industrial development to meet that shortage.

However, it is concerned to that the Ryans Road application :

- 1) will adversely affect the operation of its current business at 614 Pound Road, and/or compromise possible future further development or redevelopment of the TWT site, either for TWT purposes, or for other future industrial uses in the event that the PRG Site (and potentially a wider area) is rezoned and/or granted consent for industrial purposes.
- 2) appears to be inadequate and/or incomplete in its identification and/or proposed mitigation of the effects of the proposed development.
- 3) without limiting the generality of the above, TWT is particularly concerned regarding traffic effects including any upgrades to the Pounds Road/Ryans Road intersection and impacts on the TWT Site and PRG proposed rezoning; and wider traffic/transport effects.
- 4) does not propose any upgrades to the Pounds/Yaldhurst/School Road/Old West Coast Rd intersection even though this is understood to already be beyond capacity. Major further works would seem to be necessary as a result of the additional traffic which will be generated by the Ryans Road industrial development proposal (both individually and potential in combination with other such proposals). It is understood that there is no legal mechanism for NZTA to share costs with developers whose proposals will generate additional traffic utilising such state highway assets. This matter needs to be properly addressed and resolved as part the Ryans Road application if approved.
- 5) is not 'future proofed' eg in terms of infrastructure servicing in a manner that will facilitate additional land including the TWT and PRG Sites to be developed for industrial purposes in an efficient and cost effective manner
- 6) as currently proposed, is inconsistent with Fast Track Approvals Act 2024 (FTAA) referral criteria 22.2.a) in that it will not enable the continued functioning of existing regionally or nationally significant infrastructure and a) in that it does not adequately address significant environmental issues.
- 7) as currently proposed, appears to be inappropriate for approval under the FTAA.

TWT notes the further information that has been requested by the Expert Panel in Minute 3 dated 15 August 2025 (Appendix 5). TWT seek to be served copies of all of the information supplied by the applicant in response, and to be given adequate time to comment on the same. This is essential to ensure TWT fully understands the nature of the application and its impact on their interests or those of PRG, or any wider future rezoning of the area.

Thank you for your comments