

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)	[REDACTED] C/- Aston Consultants Ltd Resource Management & Planning		
First name	Fiona		
Last name	Aston		
Postal address	PO Box 1435 Christchurch 8140		
Home phone / Mobile phone	[REDACTED]	Work phone	[REDACTED]
Email (a valid email address enables us to communicate efficiently with you)	[REDACTED]		

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.

We own the property at 211 Ryans Road which is located opposite the Ryans Road application site, east of the Ryans/Pound Road intersection (see Fig 1 below). It is a 4 ha rural lifestyle property with an existing dwelling, used for low intensity grazing.

We are members 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'.



Figure 1: 211 Ryans Road (blue 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 and dwellings on some sites. The industrial 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.

We support the Ryans Road application to the extent that we agree that there is shortage of freehold industrial land in the City; and that the West Christchurch area, in the Pounds Road vicinity, including 211 Ryans Road and the wider PRG Site, is an ideal location for industrial development to meet that shortage.

However, we are concerned that the Ryans Road application :

- 1) will adversely affect the use and enjoyment of our property at 211 Ryans Road, and/or compromise possible future development of our site, including for 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, we are particularly concerned regarding traffic effects including any upgrades to the Pounds Road/Ryans Road intersection and impacts on our land 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 potentially 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 our land, the PRG Site and potentially wider area 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.iii) in that it will not enable the continued functioning of existing regionally or nationally significant infrastructure and iv) in that it does not adequately address significant environmental issues.
- 7) as currently proposed, would appear to be inappropriate for approval under the FTAA.

We note that further information that has been requested by the Expert Panel in Minute 3 dated 15 August 2025 (Appendix 5). We 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 we fully understand the nature of the application and its impact on our interests and those of PRG, and any future wider rezoning of the area.

Thank you for your comments