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Fast-Track Approval - Resource Consent Applications & Wildlife Act Permit

prepared for

NTP DEVELOPMENT HOLDINGS LIMITED

Pound Rd Industrial Development

July 2025

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Document Date:	July 2025
Document Version/Status:	Final
Project Reference:	0383012
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Executive Summary

Introduction

1. The Fast Track Approvals Act 2024 (**the Act** or **FTAA2024**) came into force on 23 December 2024, with its purpose being "to facilitate the delivery of infrastructure and development projects with significant regional or national benefits".

2. Within the Act, Schedule 2 lists 149 projects that the Government has determined meet the Act's purpose, granting them direct access to the Fast-track pathway. This includes the project that is the subject of this application and assessment of environmental effects (**AEE**).

Project Overview

3. NTP Development Holdings Limited (**NTP**) is seeking fast-track approval to develop a 60.4-hectare industrial subdivision at 173 and 111 Pound Road, 570 and 578 Waterloo Road, 2, 38, 64, 86 and 94 Barters Road and 4, 22, 30, 40 and 48 Hasketts Road. The site is located adjacent to the existing Industrial General Zone of Waterloo Business Park. The project aims to meet the growing demand for industrial land in Canterbury, Christchurch City and in the Islington-Hornby South locality particularly for logistics, warehousing, and light manufacturing businesses.

4. The proposed development will deliver 74 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping. This will provide for its subsequent development for industrial businesses that would be permitted in the Christchurch District Plan's Industrial General zones.

5. The project is ready to proceed immediately after receiving the relevant approvals, with stage one to be completed within two years of obtaining approval, and with the further stages to follow. The applicant has all of the relevant titles either in their ownership, under contract to purchase, or with landowner approval for inclusion in the development, and has funds reserved and set aside for the development of this project such that they require no external or bank funding. The applicant is ready to commence development immediately after obtaining the required approvals.

6. The objectives of the project include:

    - Providing **additional industrial land supply** to meet growing demands for general industrial land in this location.

    - Creating job opportunities and stimulating economic growth.

    - Ensuring compatibility with the adjacent industrial zone and surrounding environment.

Economic Benefits

7. The project is expected to deliver significant regional economic benefits, including job creation and contributions to the region's GDP during both construction and operational phases. Specifically:

- **Substantial job creation:** The project is estimated to support the creation of an annual average of **282 jobs** during the construction phase of the development, and approximately **4,192 jobs** over multiple years (including direct, indirect and induced jobs).

- **Significant contribution to Christchurch's Gross Household income:** The total impact of the project phases is estimated to add **$260 million** to Gross Household Income.

- **Considerable increase in value added to the economy:** The project development is projected to add a **total of $568 million**[1] in Value Added to the Christchurch economy during its project phases.

8. In addition to those direct benefits, the land demand assessment, land market assessment and economic assessment provided as part of this AEE all conclude that there is:

   - **High demand for** industrial land in Greater Christchurch, Christchurch City, in the Islington-Hornby South locality, and in the warehousing logistics sector; and,

   - A corresponding **shortage of supply** of unencumbered, freehold, vacant industrial land which will be exhausted in the medium or long-term, with a total shortfall ranging between 15.1ha and 43.9ha by 2034.

9. The economic assessment also finds that additional economic benefits will also be derived from the project in the form of enhanced industry co-location and market competition, and only modest economic costs associated with the insignificant loss of rural land and production.

10. For these reasons, the economic assessment provided by Savvy Consulting (see **Appendix 16**) for this project concludes that:

    - Development of the land and future construction of new buildings/lots will generate value added in the Greater Christchurch economy, sustaining short-term jobs and associated household incomes (estimated at $559 million in total value added).

    - The proposed site is a suitable and effective location for industrial development that will contribute to a well-functioning urban environment in Christchurch City and Greater Christchurch.

    - Providing additional industrial development capacity in Islington-Hornby South responds to high relative demand for (purchasable) industrial land in this part of Greater Christchurch. It would address a projected insufficiency of industrial development capacity zoned in the District Plan in the locality to meet expected medium-term demand.

    - While the site includes LUC2 land, and productive capacity of the site (limited to an estimated 8.1ha land parcel) would be lost with the proposed industrial development, such costs do not outweigh the significant direct and indirect economic benefits that the site offers to the industrial and wider regional economy.

[1] In 2020 NZ dollars

11. Having considered the economic costs and benefits of the proposal, the tests of Clause 3.10(1) of the NPS-HPL, and the objectives and policies of the NPS-UD, the proposal is supported from an economic perspective and is considered to deliver significant regional benefits.

12. Based on the evaluation above, the project is concluded to have **low economic costs** and **significant economic benefits**.

Environmental Effects

13. The assessment of actual and potential effects evaluates the relevant matters listed in Schedule 5, Clause 7 of the Act, including the following specific matters:

Clause 7, Schedule 5 Matters	Specific Effects Assessed
(a) Any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:	· Economic Effects (including sufficiency of industrial development capacity)
(b) Any physical effect on the locality, including landscape and visual effects:	· Landscape and Visual Amenity Effects · Urban Design Effects · Transport Network Effects · Regionally Significant Infrastructure and Reverse Sensitivity Effects · Climate Change and Green House Gas Effects · Highly Productive Soils and Rural Production · Three Waters Infrastructure · Water Quality Effects (Ground and Surface Water)
(c) Any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:	· Ecology and Biodiversity Effects (Herpetology, Terrestrial, Freshwater and Avifauna)
(d) Any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:	· Cultural Effects
(e) Any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:	· Earthworks and Land Contamination Effects
(f) Any unreasonable emission of noise:	· Noise Effects
(g) Any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.	· Geotechnical and Natural Hazard Effects

14. Accounting for the expert assessments appended to this AEE, the evaluation of these matters concludes that the proposal will generate no more than **minor** and **acceptable** actual or potential adverse effects on the environment.

Planning Instruments

15. The AEE includes an assessment of the activity against the relevant provisions of the applicable statutory and non-statutory planning instruments (under the RMA) per clause 5 of Schedule 5 of the FTAA2024.

16. It is important to note that given the application is tantamount to a de facto plan change (to urbanise rural land), this assessment:

    - Considers policy that legally only applies to plan changes but is still relevant to consider as to whether the application meets national policy aims and objectives, noting that to do otherwise would disregard the intent of those provisions.

    - Gives limited weight to strict 'avoidance' policies in RMA planning documents concerning the urban development and use of rural zoned land, given that the FTAA2024 clearly provides for the urbanisation of rural land by way of resource consent (and without the need for rezoning in the first instance).

17. Accounting for the applicable statutory and non-statutory planning instruments and provisions, it is concluded that the proposal is generally **consistent** with the relevant provisions in an overall sense.

Key Issues or Effects

18. Whilst the following assessment considers that the effects of the proposal are acceptable, it is considered that the key issues or affected associated with the proposal relate to the following:

    - **Transport effects** on the strategic network and the timing of the necessary upgrade of the SH1 / Pound Road intersection, recognising that this work is outside of the authorised persons control, that it is an existing issue that is modelled to worsen with development growth and the application proposal.

    - **Wastewater / potable water servicing** recognising that there are known capacity constraints within the surrounding environment. Consultation with Christchurch City Council has been undertaken and the majority of the conditions recommended by CCC are adopted as part of the application. Discussion is ongoing with CCC in regard to the outstanding matters of dispute.

    - **Lizard management** recognising that the release site is contingent on further survey work that is to be completed prior to the lizard salvage. Notwithstanding, contingency sites are in place as set out in the Lizard Management Plan (**Appendix 8**).

    - **Urban Environment** noting that the development will result in the 'urbanisation' of land that may not form a part of the urban environment.

    - **Loss of Highly Productive Soils** as the development will be undertaken on a part of the site containing Land Use Classification 2 soils.

    - **Inconsistency with outcomes sought by the Canterbury Regional Policy Statement and the Christchurch District Plan** recognising that the development will result in the

‘urbanisation’ of land that is not identified as ‘urban’ or a ‘greenfield priority area’ under the RPS and is zoned for rural purposes under the District Plan.

Adverse Impacts and s85 of the FTAA2024

19. As summarised above, the proposal is assessed as:

- Having no more than **minor** and **acceptable** actual or potential adverse effects on the environment; and
- Being generally **consistent** with the applicable statutory and non-statutory planning instruments and provisions in an overall sense.

20. Accordingly, there are no adverse impacts that reach the threshold of a “sufficiently significant adverse impact” such that they need to be taken into account in terms of an assessment under s 85 of the FTAA2024.

Conclusion

21. The Pound Road Industrial Development project is expected to deliver significant regional economic benefits while managing environmental effects to acceptable levels and generally aligning with the relevant planning instruments.

22. The project is consistent with the purpose of the Fast Track Approvals Act 2024, facilitating the delivery of infrastructure and development projects with significant regional benefits.

23. Overall, taking into account the purpose of the Act as the primary consideration, this assessment concludes that there is no basis to decline the approvals sought in this application.

Assessment of Effects on the Environment (AEE)

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Introduction

24. This substantive application is made under the Fast-track Approvals Act 2024 (**FTAA2024** or **the Act**). It is made by NTP Development Holdings (**NTP**), by Dean Christie, who is the authorised person for the Pound Road Industrial Development project listed at Schedule 2 of the FTAA2024.

25. NTP propose to subdivide and develop the 60.4-hectare subject site for industrial purposes as described in the applicant's statement attached as **Appendix 1**. This land is currently subject to rural zoning and rural / rural-residential land use.

26. A comprehensive suite of resource consents covering District Plan, Regional Plan and National Environmental Standard rules and requirements are sought, as detailed below, along with a wildlife permit under the Wildlife Act 1953. This comprises all of the necessary consents authorising and enabling subdivision and land development, operation of infrastructure services for the site, and the subsequent establishment of industrial activities, buildings and associated site improvements by future businesses.

27. The application seeks the following approvals under s 42(4)(a) (resource consents that would have otherwise been applied for under the Resource Management Act 1991 (**RMA**)) and s 42(4)(h) (wildlife approvals as defined in clause 1 of Schedule 7) of the FTAA2024:

    - **Subdivision consent:** For 74 industrial lots and infrastructures / service lots (a non-complying activity).
    - **Land use consent:** For future industrial activities, buildings and site improvements (a non-complying activity).
    - **Section 15 Discharge permit:** For the discharge of construction and operational phase stormwater (construction phase will discharge to ground, operational phase from discharge of roof for the 74 lots) (a non-complying activity).
    - **Section 14 Water permit:** For the non-consumptive take of water from an artificial watercourse and discharge of that water back into the same watercourse (as part of the damming to install a culvert) (a restricted discretionary activity).
    - **Section 9 Land-use consent:** To undertake earthworks over an aquifer and within riparian margins (including vegetation clearance) (a restricted discretionary activity).
    - **Wildlife Permit:** To authorise the trapping, salvage and relocation of native lizards.

28. The application complies with the requirements of s43 of the FTAA2024 and notably, it does not involve any ineligible activities as defined by s5 (s 13(4)(c)). Schedule 5 (clauses 5 - 8) of the Act sets out the information requirements for persons making an application for resource consent or subdivision consent (that would have otherwise been applied for under the RMA). The following assessment and its associated appendices are made in accordance with these requirements.

29. Schedule 7 (clause 2) sets out the information requirements for wildlife approval. The assessment contained in **Appendix 8** and **Appendix 25** is made in accordance with these requirements.

Site and Surrounding Environment

Site Particulars

Site Name	Parcel	Title(s)
173 Pound Road, Islington, Christchurch	Lot 3 DP 33334 Area: 9.659 ha	CB13A/921
111 Pound Road, Islington, Christchurch	Lot 2 DP 33334 Area: 9.994 ha	CB13A/920
38 Barters Road, Templeton, Christchurch	Lot 10 DP 23834 Area: 4.775 ha	CB4C/386
40 Hasketts Road, Templeton, Christchurch	Lot 2 DP 23834 Area: 2.022 ha	CB4C/378
570 Waterloo Road, Islington, Christchurch	Lot 1 DP 33334 Area: 9.601 ha	CB13A/919
578 Waterloo Road, Islington, Christchurch	Lot 2 DP 20738 Area: 6,460m²	CB818/45
2 Barters Road, Templeton, Christchurch	Lot 1 DP 20738 Area: 3,891m²	CB821/98
64 Barters Road, Templeton, Christchurch	Lot 2 DP 38418 Area: 2.157 ha	CB20A/841
94 Barters Road, Templeton, Christchurch	Lot 7 DP 23834 Area: 2.913 ha	CB4C/383
4 Hasketts Road, Templeton, Christchurch	Lot 6 DP 23834 Area: 2.022 ha	CB4C/382
22 Hasketts Road, Templeton, Christchurch	Lot 2 DP 24156 Area: 2.026 ha	CB39D/83
30 Hasketts Road, Templeton, Christchurch	Lot 1 DP 24156 Area: 2.056 ha	CB5C/28
48 Hasketts Road, Templeton, Christchurch	Lot 1 DP 23834 Area: 2.491 ha	CB4C/377
86 Barters Road, Templeton, Christchurch	Lot 1 DP 38418 Area: 9.605 ha	CB20A/840

Site and Surrounding Environment Description

The Application Site

30. The application site[2] (hereafter referred to as **the site**) is located in the suburb of Templeton, which is situated on the south-western rural-urban fringe of Christchurch City. The legal descriptions of the site are set out in the 'site particulars' section of this report, and a copy of the records of titles are attached as **Appendix 2**.

31. The site is depicted on the aerial image in **Figure 1** below.

Figure 1. Aerial image of locality (Source: Canterbury Maps)

32. The site has a total area of approximately 60.4-hectares (**ha**), which is proposed to be subdivided and developed for industrial uses. The site is situated on the west side of Pound Road, to the east of Barters Road and south of Hasketts Road, adjacent to Templeton Country Club Golf Course to the north.

33. The site is currently occupied by rural-residential activity, with all of the underlying properties (asides 570 Hasketts Road) containing a residential unit and associated ancillary buildings. Existing shelter belt style planting is located across the site and along the boundaries of the various allotments, with established garden vegetation concentrated around the residential buildings. 173 Pound Road is used for productive purposes (an onion farm), and 111 Pound Road is grazed by deer. The site is generally flat with a gentle slope from north to south.

34. A water race flowing north to south is located along the Barters Road frontage, with a 200m section of this also located within the site at 94 Barters Road. This is a lateral channel of the

[2] The 'site' comprises those properties listed in the 'site particulars' section of this report.

Paparua Water Race Network (**PWRN**) and is owned and operated by Selwyn District Council (**SDC**). The section of race within the Site was part of a larger historical race network which is now mapped as 'obsolete' in the Selwyn District Council water race maps[3]. The PWRN channels are considered artificial waterways. There are no other ecological, waterway, cultural or heritage items/areas associated with the site identified in the Christchurch District Plan (**CDP** or **District Plan**) or identified by the project's ecologists.

35. For completeness, hydrological indicators of potential wetland habitat were identified (via aerial photography) within 111 Pound Road, refer to the Wildlands terrestrial assessment in **Appendix 7**. Access to this part of the site has not been possible due to timing constraints and existing land use activity on this site, and thus the project ecologist has not been able to confirm if this is wetland habitat or not. A condition of consent is volunteered requiring that a site assessment of this habitat occurs prior to commencement of any works within this part of the site. Should wetland habitat be confirmed, NTP will obtain any necessary consents and/or ensure necessary offsets are provided. Due to the size and location of this potential habitat, it will not prevent development of the majority of the site.

36. The site is subject to several significant noise sources and experiences higher noise levels which distinguish it from typical or more remote rural environments. Existing noise levels at the site already exceed the District Plan noise rules, particularly during more sensitive nighttime hours. This is described in further detail in the acoustic assessment in **Appendix 4**, however in summary, the key factors contributing to the noise levels at the site include:

- Aircraft approaching and departing the Christchurch International Airport.
- Road traffic noise from nearby public roads.
- Ruapuna Speedway to the north-west of the site.

37. These key features are depicted in **Figure 2** above.

The Site Ground and Groundwater Characteristics

38. The Canterbury Maps GIS system shows that the site is over the unconfined/semi-confined Groundwater Aquifer system. The groundwater is deep and is considered to fluctuate between 13m - 17m depth below ground level (**bgl**) based on ECan well data.

39. The site stratigraphy has been derived from the geotechnical investigations as carried out by KGA Geotechnical, provided in detail in the geotechnical report attached as **Appendix 5**. In summary, the subsurface conditions generally comprise silty and sandy soils overlying dense gravels of variable depth.

40. Groundwater was not encountered during site testing or nearby shallow testing, and as above is likely to fluctuate between 13m to 17m depth bgl.

41. Given the depth to groundwater the site does not contain spring upwellings or other natural surface water features. No visible stream channels, saturated ground or hydrophytic vegetation has been observed on site.

[3] Refer to Figure 1 of **Appendix 9** for a copy of this map showing the 'obsolete' water race.

42. A Detailed Site Investigation (DSI) for contamination has been undertaken on the site by Momentum Environmental and is attached as **Appendix 6**. The contamination found on site that will require remediation is largely limited to historical burn piles across numerous parts of the site, dumped material on 22 Hasketts Road, an above ground storage tank on 173 Pound Road, and fragments of asbestos at 64 and 95 Barters Road. Further investigation will be undertaken on site as well as the preparation of a Remedial Action Plan (RAP) prior to commencement of bulk earthworks. This is discussed further within the assessment of effects.

The Site Ecology

43. The site's ecological environment has been determined through ecological investigations carried out by Wildlands and Instream Consulting and is reported in detail in the terrestrial ecological assessment attached as **Appendix 7** (covering lizards, terrestrial and avifauna), and **Appendix 9** (covering aquatic ecology).

44. In summary, the site is located within the Low Plains Ecological District of the Canterbury Plains Ecological Region and is situated on the fringe of Christchurch District. The site is primarily actively grazed and cultivated farmland, containing farm buildings, dwellings and gardens.

45. The vegetation on site is highly modified and dominated by exotic species, including exotic pasture grasses, crops, and trees. The vegetation is considered of low ecological value, noting that whilst twenty indigenous vascular plant species were recorded, only one was naturally occurring and the others were planted in gardens and borders.

46. With regard to avian habitat, during the site visit thirteen species were observed within the site, including three not-threatened species. The site provides habitat for bird species, although it is recognised that these highly modified habitats are dominated by exotic species and habitat values and unlikely to be high.

47. In terms of herpetofauna, targeted lizard surveys have been undertaken across the site using Artificial Cover Objects (ACO's). The ACO's were left for a period of six weeks before being checked multiple times between 24 April and 8 May 2025. The surveys have confirmed the presence of southern grass skink on the site, a total of 8 were caught and 37 sighted. No other lizard species identified in the initial desktop assessment were detected as part of the surveys.

48. Noting the identification of the southern grass skink (Oligosoma aff. polychroma Clade 5), a Lizard Management Plan (LMP) has been prepared by Wildlands, attached as **Appendix 8**, and of which forms a part of the application for approval under the Wildlife Act 1953 (WA). This is also supported by **Appendix 25** which addresses the information requirements for wildlife approvals under Schedule 7 (clause 2) of the Act. The LMP sets out the lizard values on site, salvage and relocation of the lizards during site works. All lizards will be trapped and relocated to the neighbouring Templeton Golf Course where a release site will be established.

49. Lastly, with regard to aquatic ecology, the artificial water race that flows partially within the site and the frontage of Barters Road may contain some limited aquatic values but is not considered a natural hydrological feature of the landscape.

50. No wetland habitat was observed within the surveyed areas of the site. Some hydrological indicators of potential wetland habitat were identified on aerial imagery within the property at 111 Pound Road, but they have not been investigated due to access constraints. A condition of consent is recommended requiring a site visit to determine this habitat, and if necessary, any

resource consent approvals obtained (including potential mitigation or offsetting from the habitat), before works commence on this part of the site.

The Surrounding Environment

51. Properties opposite the site on Barters Road are of a rural-residential nature (33 Barters Road to 1 Maddisons Road). The wider area also contains a number of rural-residential homes located along the local roads and further within the landscape accessed via long driveways. Land use is predominantly agricultural with stock grazing and crop fields present.

52. To the east is Waterloo Business Park, which is an established Industrial General Zone, comprising warehousing type industrial activities.

53. To the immediate north of the site is Templeton Country Club Golf Course (273 Pound Road), which occupies and leases a 53ha site owned by Christchurch City Council. Established mature trees and scrub bush is located on the boundary of the Golf Course of the application site.

54. This site is zoned Open Space Community Parks and is also identified as a Site of Ecological Significance in the Christchurch District Plan. Whilst identified as a Site of Ecological Significance it is recognised that this site is highly modified due to its use as a golf course.

55. North-west of the site, on the opposite side of Hasketts Road is Ruapuna Park and Speedway. Ruapuna Park is zoned 'Specific Purpose 'Ruapuna Motorsport' Zone' in the Plan, providing for motorsport activities.

56. As noted above, along the Barters Road boundary of the site is the lateral channel of the PWRN. Over time the water race channels have generally either been decommissioned or piped within the Canterbury area as the land-use changes from rural urban fringe to industrial or residential. The water race traverses the majority of the Barters Road frontage, before being piped beneath the southern end of Barters Road.

57. Overall, the character of the surrounding area is very mixed, and not typical of more remote rural areas. The area is a transitional space between the industrial and urban rural fringe zones along Pound Road and is strongly influenced by the presence of quarries, Ruapuna Park Speedway, and the airport flight path.

The Surrounding Transport Environment

58. The transport environment in the vicinity of the site has been described in the transport assessment carried out by Novo Group, attached as **Appendix 10**. A summary is provided below.

59. The site has frontage to Pound Road, Barters Road and Hasketts Road. Pound Road is defined a Minor Arterial Road in the District Plan and serves as a connector between key arterial routes of Main South Road (SH1) and Waterloo Road. Waterloo Road is defined as a Collector Road in the District Plan.

60. Barters and Hasketts Roads are classified as local roads in the District Plan, the road corridors are rural in character with wide grass shoulders and no formal pedestrian infrastructure. The roads have an operating speed of 80km/h.

61. The Waterloo Road / Barters Road intersection provides a right turn bay on Waterloo Road, safely accommodating traffic turning into Barters Road. A level railway crossing is located on Pound Road between Waterloo Road and Main South Road (SH1), the crossing includes barrier arms and signals. The Pound Road / Waterloo Road and Pound Road / SH1 intersections are linked traffic signals encompassing the rail crossing. There are existing capacity and safety concerns at this intersection, discussed further within **Appendix 10**.

62. Pound Road includes a separated / painted cycle lane on both sides of the road. A bus stop is located just south of the site on Waterloo Road providing a service between New Brighton and Rolleston, via Central Christchurch.

The Proposal

63. NTP propose an industrial subdivision of 60.4ha of rural land at Pound Road, Templeton. NTP propose to develop this land into a freehold industrial subdivision of 74 lots and to provide a framework for the development of the lots by future purchasers for industrial activities, buildings and site improvements. NTP have provided the applicant's / authorised person's statement in **Appendix 1**.

64. It is generally proposed that the operative District Plan's Industrial General Zone (IG) rules and relevant District Plan general rules applicable to the IG Zone (e.g. noise, lighting and signage rules), applicable at the date of this application, shall apply to the newly created lots in order to govern future land use activities and development on individual sites. In addition to consent conditions that provide for this, some additional conditions propose bespoke requirements for site development and activities in order to address the context of the site.

65. Anticipated industrial activities include dry industrial uses (with low water/wastewater use requirements), light manufacturing, warehouse and logistics businesses. Specifically excluded from the application are noise-sensitive activities (i.e. residential activities) and bird-attracting activities (i.e. fish or meat processing).

66. The application also includes associated infrastructure for the development such as roads, three-waters utilities and site landscaping.

67. Scheme plans for the proposal prepared by Davie Lovell-Smith are attached as **Appendix 3** to this AEE and a proposed subdivision plan is shown in **Figure 4** below. Further details of the proposal are set out below under the relevant headings.

Consents Sought

68. The following approvals are sought under s42(4)(a) of the Act (resource consents that would have otherwise been applied for under the RMA) for the proposed activity:

- **Subdivision consent:** For 74 industrial lots and infrastructure/service lots (a non-complying activity).
- **Land use consent:** For future industrial activities, buildings and site improvements (a non-complying activity).

- **Discharge permit (s15):** For the discharge of construction phase stormwater and operational phase stormwater (for discharge from the roof) (a non-complying activity).

- **Water permit (s14):** For the non-consumptive take of water from an artificial watercourse and discharge of that water back into the watercourse as part of the installation of a culvert in the Paparua Water Race Network (Barters Drain) (restricted discretionary activity).

- **Land-use consent (s9):** To undertake earthworks over an aquifer (restricted discretionary activity).

69. In addition to the resource consents described above, approvals for a Wildlife Act Authority (WAA) Permit are sought under s 42(4)(h) of the Act for disturbing native lizard habitat and for the capture and relocation of any native lizards.

Subdivision

Allotments and Staging

70. Four stages (that may occur simultaneously or consecutively) are proposed for subdividing the 74 lots of varying sizes, as set out in the Scheme Plans in **Appendix 3**, and as depicted in **Figure 2** over the page.

71. The subdivision also includes the creation of lots for roads to enable access and for installing civil infrastructure and for three-waters utilities. Timing for the construction of the stages and the proposed sequence of works are outlined in the applicant's statement (see **Appendix 1**).

72. The proposed 74 industrial lots range in size from 800m^2 - 5000m^2 for the lots located along Barters Road and in the centre of the development along the main roads. Two larger lots are positioned along the Hasketts Road frontage of the site, Lot 43 being 4ha in area, and Lot 73 (balance lot) having an area of 8ha.

73. The proposed staging of the development is set out below:

- **Stage one** comprises 26 industrial lots, Roads 2, 3 and 4, Lot 200 for stormwater management, the installation of a culvert in association with the construction of Road 3 connection to Barters Road.

- **Stage two** provides 32 industrial lots and a stormwater management area (proposed Lot 201). Stage two will also include the construction of the intersection with Pound Road and Road 1 (including the proposed roundabout), as well as the continuation of Roads 2 and 3.

- **Stage three** provides 15 industrial lots and a stormwater management area (proposed Lot 202), and extensions of Road 4.

- **Stage four** has a total area of 8.6ha and is for a balance lot. At the time this allotment is developed it would be subdivided further, with a road connection provided to Hasketts Road, as indicatively shown on the scheme plan.

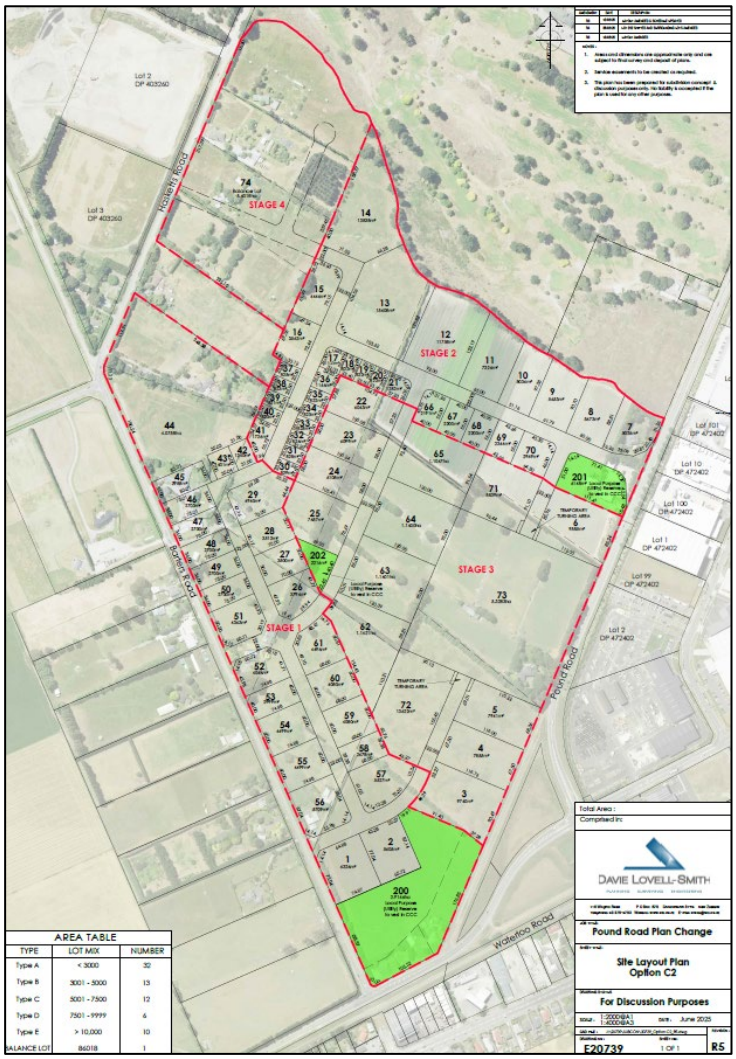

Figure 2. Proposed subdivision plan (Source: Davie Lovell Smith)

74. Given the industrial nature of the proposal, no local reserves/green spaces are proposed. All existing buildings will be removed prior to subdivision works commencing, aside from the existing buildings on Lot 73 and Lot 74, which will be retained until such time as these sites are developed for industrial purposes.

Roading

75. This involves creating and vesting legal roads for access and installing civil infrastructure for servicing the development as per the plans in **Appendix 3** and detailed within the Infrastructure Report (**Appendix 12**).

76. All roads are proposed to be vested as part of the subdivision ('roads 1 – 4'). The roads will have a typical width of 22m, with formed width of 12.5m to enable on-street parking and to facilitate tow-way movement of heavy vehicles. Footpaths will be provided on both sides of all internal

roads. A shared path will be provided through Lot 200 to form a connection with the existing Waterloo Road share path, ensuring pedestrian and cycle connectivity through to the Waterloo bus stop and various surrounding cycle and pedestrian paths.

Landscaping

77. A 5m wide landscaping strip is proposed along the Barters Road frontage of the site, between the future development and the Barters Road water race. The landscaping strip will be planted with a variety of indigenous species, as per the plan attached as part of **Appendix 11**. Following development of the sites, the landscaped strip will be the responsibility of future lot owners to maintain, and a consent notice will be imposed to reflect this.

78. A 1.5m landscaped strip is proposed along the Pound and Hasketts Road frontages, in line with the Industrial General provisions. Street-tree planting is proposed throughout the road reserves (see attached concept landscape plan prepared by Novo Group (refer **Appendix 11**).

79. A condition of consent is also proposed which will require the planting of 1 tree/10m of boundary along the northern boundary of the site and the Open Space Community Parks Zone (Templeton Golf Course). Following development of these lots, the trees will be the responsibility of future lot owners to maintain, and a consent notice will be imposed to reflect this.

80. All proposed planting will be either native and selected from the planting list in Appendix 6.11.9 of the District Plan and comprise indigenous species.

Servicing and Infrastructure

81. The proposed three water servicing is outlined in detail in the Davie Lovell-Smith Infrastructure Report (**Appendix 12**) and is summarised below:

Water Supply

82. Water supply is proposed to be provided via a new 200mm watermain connecting to the existing 200mm watermain at the intersection of Waterloo and Pound Road. This new main will be extended into the development to Lot 202, of which will contain the proposed tank and pump infrastructure. From the tank, a network of mains will be extended through the road network of the development. Refer to the **Appendix 12** for further detail.

83. The provisional sizing of the tank is based on achieving FW4 fire hazard category as well as to provide sufficient buffering in the network. All water supply infrastructure will be designed and constructed in accordance with the requirements of the CCC Infrastructure Design Standards (IDS) and Construction Standard Specification (CSS).

84. The application does not propose that the Water Take Permits for the existing bore will be transferred to the applicant for industrial use.

Wastewater reticulation

85. Wastewater reticulation is proposed to be serviced by the CCC wastewater network via a new low-pressure sewer (LPS) reticulation network, discharging into the 375mm pipe in Pound Road/Waterloo Road (WW Access ID 45971). This will involve the establishment of private storage and associated LPS tank and pump on individual lots, based on their anticipated flows.

86. The LPS system will be designed and sized by IOTA in accordance with CCC requirements. The development works will include the installation of a lateral pipe, isolation valve and boundary box to each lot located at the road boundary; the pump tanks will then be installed at time of building consent and connect to the boundary box installed by the developer.

87. The wastewater system has been designed in consultation with the CCC 3-waters team. Council have suggested conditions of consent for the proposed LPS network, which are adopted as part of the application.

Stormwater

88. The stormwater management strategy will utilise both public and private stormwater discharge consents to treat, convey and dispose of stormwater. Refer to the Infrastructure Report in **Appendix 12** for further detail.

89. It is proposed to have individual lots soaking all stormwater up to and including the 2% AEP event for roof areas directly to ground within the lot, and consent is sought (as part of this application) under the provisions of the Regional Plan. The intention is that this consent will be partially transferred to future lot owners, who will be responsible for installation of the stormwater system within their lot, and ongoing compliance with conditions.

90. Stormwater from public roads and reserves, and individual hardstand areas will be managed under the Christchurch City Council Global Discharge Consent. A discussion with CCC has been had in regard to this, including through the provision of a methodology and consent conditions from CCC. Stormwater from these surfaces will be directed to kerb and channel where it will then enter the piped network via sumps and be conveyed to the treatment and soakage facilities at Lots 200 and 201. This piped network will be sized to convey all flows up to and including the critical duration 20% AEP event, in accordance with the CCC IDS. All lots will be expected to provide their own treatment for hardstand areas prior to discharge to the public network, and a consent notice is to be registered on the title for all lots to enforce this.

91. Secondary flow paths will be utilised for flows exceeding the capacity of the piped network and graded as such to convey flows to Lots 200 and 201. Secondary flow paths will be designed to ensure no flow enters the private lot in the critical duration 2% AEP event. Flood modelling will be undertaken as part of detailed design for the 1 in 50-year and 1 in 200-year storm events. Sites will be sufficiently elevated to ensure compliance with District Plan requirements for flooding of private property and minimum finished floor levels.

92. The design incorporates treatment mechanisms to ensure the discharge to ground will not have the potential to adversely affect groundwater. Further detail of this is attached as part of the Infrastructure Report (**Appendix 12**).

93. Consultation has been undertaken with CCC in regard to the above stormwater strategy. A series of standard conditions and proposed consent notices have been provided by Council Stormwater Engineer, Mr. Brian Norton. It is proposed to adopt all of the suggested conditions, with the exception of two (Council's suggested condition 17 and 20). Further detail on this reasoning is included within **Appendix 12**.

Power and Communications

94. Power and telecommunications will be provided to all sites to utility company and industry standards. Undergrounding of overhead power lines will be required along Pound Road where Road 1 forms the new intersection. There are no known telecommunication or power capacity constraints in this area that would affect the proposed development.

Waterways and culvert installation

95. As described in the infrastructure report (refer culvert construction methodology attached at the rear of **Appendix 14**), it is proposed to install one culvert within the PWRN as part of the construction of Road 3 and its connection to Barters Road. The culvert has been designed based on the sizing of existing culverts further downstream and to minimise any potential adverse effect on ecological habitat and prevent the blocking of fish passage.

96. The installation of the culvert will require clearance of grass, gorse hedging and other non-indigenous vegetation along this boundary. As recommended by the aquatic ecologist, a fish salvage will be required to be undertaken by a suitably qualified freshwater ecologist prior to works being undertaken, and with the required permits in place.

97. The aspect of the PWRN that flows into the site will be infilled as part of the development. This drain has been assessed by the aquatic ecologist as having low ecological value. In order to mitigate the loss of this waterway, a 5m planted landscape buffer is proposed along the Barters Road frontage of the site. The buffer will be planted, at time of subdivision with a variety of indigenous species from Christchurch City Council's streamside planting guide, as depicted in the indicative landscape plan at **Attachment 11**.

98. Consultation with Selwyn District Council has been undertaken in regard to the proposed culvert installation. Approval from Selwyn District Council has been obtained to undertake the works within the PWR, attached as part of **Appendix 18**. Approval has also been obtained from CCC, recognising that the culvert crossings will be vested as road to CCC as part of the subdivision.

Earthworks and Construction

99. As noted above, development and associated earthworks are proposed to be undertaken in four stages. Earthworks for subdivision are described in detail in the Davie Lovell-Smith Infrastructure Report and Earthworks Management Plan attached as **Appendix 12** and **Appendix 13** respectively.

100. Earthworks will be carried out on the site to ensure that all future lots will drain towards the new roads at a grade of at least 1/300. All lots will be elevated above the road and utility lot frontages to ensure sufficient secondary flow conveyance without inundation on the lot in low AEP events. The natural fall of the site from north to south will be generally maintained to ensure secondary flow is conveyed to the stormwater facilities located on Lots 200 & 201. This will involve grading the roads towards these facilities to carry any excess runoff from the lots and flows generated from within the road reserve.

101. The total estimated on-site cut to fill volume is approximately 175,000m^3. The significant areas of cut are in the roadways and proposed stormwater basins, where the depth to subgrade may be up to 3.5m below existing ground level. It is proposed to fill the two low areas of the site (historic channels), as described within **Appendix 12**.

102. Erosion and sediment controls are to be installed in accordance with the Environment Canterbury (ECan), 2023 Erosion and Sediment Control Toolbox for Canterbury prior to the commencement of any earthworks on the site and maintained for the full duration of the works. The controls to be installed are detailed in the Davie Lovell Smith Earthworks Management Plan (see **Appendix 15**) and include: stabilised site entrances, clean water diversion bunds/channels, dirty water diversion bunds, super silt fences and sediment retention areas and soakage devices.

103. A number of DSI's for contamination have been undertaken on the site by Momentum Environmental, as attached as **Appendix 6**. The contamination found on site includes a number of historical burn piles, fragments of asbestos containing materials, and above ground storage tank. The areas of contamination above background level are proposed to be remediated in accordance with industry standards per a Remediation Action Plan (RAP) that will be implemented prior to earthworks on the wider site commencing. It is recognised that there were parts of the site that will require further testing, and as such, a condition of consent is volunteered requiring provision of a full DSI investigation to be completed with remediation required to be completed prior to any bulk earthworks commencing on site. To this extent, an updated final DSI and RAP will be provided to CCC and ECan following the finalised and updated DSI.

Land Use - Industrial Activities

104. The site is currently zoned Rural Urban Fringe (RUF) under the operative Christchurch District Plan. As such, the zoning of the site does not anticipate the urban industrial development and activities that this application seeks to provide for. Therefore, the application proposes that the RUF provisions of the District Plan do not apply to future land use within a majority of the proposed 74 lots (see exceptions below) and instead proposes a framework for future industrial development of the lots by way of consent conditions that are broadly based on the IG Zone rules.

105. This approach (to essentially rezone the site via consent) will facilitate subsequent development, including the construction of industrial buildings and activities without the need for (or reducing the need for) further resource consents under the current RUF District Plan provisions.

106. For reasons detailed in the following assessment of effects, the activities that are specifically excluded/not provided for within the application are as follows (and as defined in the District Plan):

- Residential activities / residential units including for management / security purposes (noise-sensitive),
- Education activities (noise-sensitive), and
- Heavy industrial activities including fish processing or packing plants and abattoirs or freezing works.

Framework for Future Development

<u>Conditions for Activities & Built Form:</u>

107. The framework (conditions) described below will apply to the future development of Lots 1 – 74. The proposal is to replace the RUF activity status and built form standards with the IG activity standards and built form standards (noting the excluded activities above). For ease of future reference and in the event of changes to the District Plan rules, it is proposed to attach the

relevant District Plan sections/rules as at the date of the decision to the decision document as an appendix.

108. The draft zone conditions are as follows:

Activity Standards

*a. Excepted as specified below in b., the future development of lots 1 –74 for industrial uses shall comply with the District Plan Activity Standards for the Industrial General Zone at rule 16.4.1.1 Permitted activities attached as [**Appendix XX**] to this decision.*

b. The following activities are not authorised by this consent:

- *Residential Activities / Residential Units / Visitor Accommodation (including for management / security purposes)*
- *Education Activities, and*
- *Heavy Industrial Activities (Fish Processing or Packing Plants and Abattoirs or Freezing Works).*

Built Form Standards

*a. Except as modified below in b., the future development of lots 1 – 74 shall comply with the Built Form Standards in Rule 16.4.2 - Industrial General Zone attached as [**Appendix XX**] to this decision; except that:*

b. The minimum building setback from Barters Road shall be 5m.

c. A minimum building setback of 3m applies to the northern boundary of Lots 7 – 14 and Lot 74 with the Open Space Community Parks Zone (Templeton Golf Course).

d. On lots 7 – 14 and 74 adjoining Open Space Community Parks Zone (Templeton Golf Course), trees shall be planted adjacent to the shared boundary at a ratio of at least 1 tree for every 10m of the boundary or part thereof. All trees required by this rule shall be in accordance with the provisions in Appendix 6.11.6 of Chapter 6 of the District Plan.

General Conditions

109. In addition to the conditions above specifying the activities and built form authorised under the consent, the application proposes that the other general chapters of the District Plan will also apply to the future development of sites as if they were zoned Industrial General, except where the site context warrants bespoke conditions to address adverse effects. These provisions can be brought to the attention of future purchasers via consent notices where relevant.

110. The following general conditions are proposed:

Noise

*a. Future development of lots 1 – 74 for industrial purposes shall comply with the District Plan noise rules in 6.1.4 General Noise Rules and 6.1.5 Zone Specific Noise Rules attached as [**Appendix XX**] to this decision.*

b. A 2.2m high acoustic fence shall be erected along the boundaries of the development with 14 Hasketts Road. The fence shall be constructed with a minimum surface mass of 10kg/m2 (20mm timber palings or equivalent) and shall be constructed such that there are no gaps.

c. The daytime limit of 55dB LAeq(15min) and maximum noise limit of 75dB Lamax shall be adopted as the daytime and nighttime noise limit within 14 Hasketts Road.

d. The daytime limit of 55dB LAeq (15min) and no maximum noise limit shall be adopted as the daytime and nighttime noise limit within the Templeton Golf Course (274 Pound Road).

Glare

*a. Future development and construction activities on Lots 1-73 for industrial purposes shall comply with the District Plan Glare rules in 6.3.4 Control of Glare attached as [**Appendix XX**] to this decision.*

Control of Light Spill

*a. Future development and construction activities on lots 1 – 73 for industrial purposes shall comply with the District Plan Light Spill rules in 6.3.5 Control of Light Spill and 6.3.6 Light Spill Standards by Zone for Industrial zones (permitted lux spill horizontal or vertical 20 Lux) attached as [**Appendix XX**] to this decision.*

Signs

*a. Any signs part of the future industrial development of lots 1 – 74 shall comply with the District Plan Sign Rules in 6.8.4 attached as [**Appendix XX**] to this decision, as if the site were zoned Industrial General (not Rural).*

b. Except there shall be no LED / Digital Signs or Billboards permitted by this consent.

Earthworks

*a. Any earthworks for the future development of lots 1 – 74 with buildings shall comply with the Industrial General zone in Table 9 Maximum Volumes - earthworks of Rule 8.9.2.1 of the District Plan attached as [**Appendix XX**] to this decision, as if the site were zoned Industrial General (not Rural).*

Transport

*a. Future development of lots 1 – 74 for industrial purposes shall comply with the District Plan Activity Status Tables – Transport in rule 7.4.2 attached as [**Appendix XX**] to this decision, as if the site were zoned Industrial General.*

*b. Future development of Lots 1 – 74 for industrial purposes must comply with the District Plan Transport Standards in Rule 7.4.3 attached as [**Appendix XX**] to this decision.*

Barters Road Landscaping Strip

a. A 5m landscaping strip shall be provided along the Barters Road frontage of the site at time of development of Stage One. The landscaping strip shall be planted with indigenous species listed within the plant palette, in accordance with the 'Landscape Offset Enhancement – Overall' and 'Landscape Offset Enhancement – Planting details' attached as Appendix 11 to the application.

Proposed / Draft Conditions

111. In addition to the above framework, the application includes a broader package of proposed draft consent conditions (see **Appendix 14**) which have been identified in the experts' effects assessment or that form part of CCC's or ECan's standard subdivision, earthworks and discharge conditions. These conditions take into account the feedback received from CCC and ECan, including their suggested alternatives for conditions (which have not been adopted for the reasons expressed in the experts' effects assessments).

112. Where possible, agreement has been sought with relevant authorities (CCC, ECan, DOC and NZTA) regarding the recommended conditions, as discussed within the following assessment.

Wildlife Act 1953 & Lizard Habitat

113. Wildlands has carried out an assessment to determine if the site contains habitat likely to support an indigenous lizard population, this is supported by lizard surveys which have been conducted across the majority of the site (see **Appendix 7**).

114. All native reptiles are legally protected under the Wildlife Act 1953, and the protection of habitats used by populations of native lizards (particularly threatened species) is considered a matter of national importance under the RMA. Lizards have been detected on site as part of the survey work, and therefore the applicant seeks a wildlife approval (under s 42(4)(h) of the Act) to handle and relocate lizard specimens.

115. Wildlands have prepared a Lizard Management Plan (LMP) (see **Appendix 8**), which details the methods involved with native lizard salvage and relocation of species at the site prior to or during development works. It is proposed that the species will be relocated to a release site within Templeton Country Club to the north of the site.

116. A copy of the draft LMP was sent to the Department of Conservation (DOC) prior to lodgement of the substantive application. Feedback provided from DOC is attached as part of the consultation summary in Appendix 18. As set out further below (consultation section), DOC are largely satisfied with the content and detail of the LMP however have raised some questions in regard the release site for lizards. NTP are continuing to work through these matters and will continue to engage with DOC through the process.

Statutory Context

Fast-track Approvals Act 2024

117. This application is made under the FTAA2024. Other legislation relevant to the application, as referred to in the Act, include the Resource Management Act 1991 (RMA) and the Wildlife Act 1953 (WA).

118. The purpose of the FTAA2024 is set out in section 3 as follows:

> *The purpose of this Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.*

Section 85 Considerations

119. As per the panel's decision-making considerations under the Act, because the proposal does not involve activities which would require refusal as referenced in s85(1) and (2) of the Act, this application could only be declined under s85(3)(b) if it would result in 'sufficiently significant adverse impacts' that are out of proportion to the project's regional or national benefits', even after taking into account:

- Any conditions that the panel may set in relation to those adverse impacts; and
- Any conditions or modifications that the applicant may agree to or propose to avoid, remedy or mitigate, offset, or compensate for those adverse impacts.

120. As per s85(5) of the Act, an adverse impact means any matter considered by the panel (as per s81(2)) that weighs against granting the approval. To avoid doubt s85(4) states that a panel may not form the view that an adverse impact meets the threshold in subsection (3)(b) solely on the basis that the adverse impact is inconsistent with or contrary to a provision of a specified Act or any other document that the panel must take into account or otherwise consider).

121. Relevant to adverse environmental effects, only the sufficiently significant adverse effects of the proposal – whether individual or cumulative – have the potential to weigh against granting of the approvals. Therefore, any significantly adverse environmental effects of the proposal that cannot be appropriately avoided, remedied, mitigated, offset or compensated would need to be balanced against the national or regional benefits of the project.

122. The following sections of this assessment evaluate all relevant effects and planning documents/provisions, prior to reaching a conclusion in regards s85.

Other Statutory Documents

Wildlife Act 1953

123. Approvals are sought under s42(4)(h) (wildlife approvals as defined in clause 1 of Schedule 7) of the FTAA2024. Wildlife approval means a lawful authority for an act or omission that would otherwise be an offence under any of the sections 58(1), 63(1), 63A, 64, 65(1)(f), 70G(1), 70P, and 70T(2) of the Wildlife Act.

124. It is an offence under s 65(1)(f) and 70P the Wildlife Act to interfere with protected animals, including indigenous lizards which may occupy areas of the site without the required licence, permit, concession, or other right or authority. As described above in the description of the proposal, approval is sought for developing land where indigenous lizards may be present in accordance with the LMP included in **Appendix 8**. This is also supported by **Appendix 25** which addresses the information requirements for wildlife approvals under Schedule 7 (clause 2) of the Act.

Resource Management Act 1991

125. This application is for approvals sought under s42(4)(a) (resource consents that would have otherwise been applied for under the RMA). The various resource consents (as described earlier in this report) and the corresponding assessment of effects on the environment (AEE) is prepared in accordance with the information requirements of the FTAA, specifically clauses 5 – 8 of the Schedule 5. Where logical, this has included an assessment of effects in accordance with the requirements of the RMA.

126. The statutory context described in the following sections of this report is focused on the relevant RMA context, which in summary includes:

- The National Policy Statement for Freshwater Management 2020 (NPS-FM);
- The National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB);
- The National Policy Statement for Highly Productive Land 2022 (NPS-HPL);
- The National Policy Statement on Urban Development 2020 (NPS-UD);
- The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES Soil);
- The Canterbury Land and Water Regional Plan (LWRP);
- The Canterbury Air Regional Plan (Air Plan); and,
- The Operative Christchurch District Plan.

National Environmental Standards

NES for Contaminants in Soil

127. The NES Soil controls soil disturbance on land where an activity on the Hazardous Activities and Industries List (HAIL) is being carried out, has been carried out, or is more likely than not to have been carried out.

128. The ECan Listed Land Use Register (LLUR) is used to hold information about sites that have used, stored or disposed of hazardous substances, based on activities detailed on the HAIL (MfE, 2011). It should be noted that the LLUR is not complete, and new sites are regularly being added as ECan receives information and conduct their own investigations into current and historical land uses. Part of the site is identified on the LLUR as having HAIL activity within the search

area. Further, the application site has been identified as HAIL land via a DSI **Appendix 6** and therefore the following provisions of the NES Soil apply.

Regulation 8:

(4) Subdividing land or changing the use of the piece of land is a permitted activity while the following requirements are met:

(a) a preliminary site investigation of the land or piece of land must exist:

(b) the report on the preliminary site investigation must state that it is highly unlikely that there will be a risk to human health if the activity is done to the piece of land:

(c) the report must be accompanied by a relevant site plan to which the report is referenced:

(d) the consent authority must have the report and the plan.

Regulation 9:

(3) If a requirement described in regulation 8(4) is not met, the activity is a controlled activity while the following requirements are met:

(a) a detailed site investigation of the piece of land must exist:

(b) the report on the detailed site investigation must state that the soil contamination does not exceed the applicable standard in regulation 7:

(c) the consent authority must have the report:

(d) conditions arising from the application of subclause (4), if there are any, must be complied with.

(4) The matter over which control is reserved is the adequacy of the detailed site investigation, including—

(a) site sampling:

(b) laboratory analysis

(c) risk assessment.

Regulation 10:

(1) This regulation applies to an activity described in any of regulation 5(2) to (6) on a piece of land described in regulation 5(7) or (8) that is not a permitted activity or a controlled activity.

(2) The activity is a restricted discretionary activity while the following requirements are met:

(a) a detailed site investigation of the piece of land must exist:

(b) the report on the detailed site investigation must state that the soil contamination exceeds the applicable standard in regulation 7:

(c) the consent authority must have the report:

(d) conditions arising from the application of subclause (3), if there are any, must be complied with.

129. The volume of the disturbance of the soil on the piece of land does not meet Regulation 8(3)(c), as the volume of soil disturbance will exceed 25m³ per 500m² on the piece of land. This triggers the requirement for consent under Regulation 9(1).

130. The DSI also shows that soil contamination exceeds the applicable standard in Regulation 7 in defined locations on site. Pursuant to Regulation 10 of the NES Soil, the proposal is a restricted discretionary activity.

NES Soil Consent Status

131. Overall, the proposal must be considered as a **restricted discretionary activity** under the NES Soil.

Regional Plans

Canterbury Land and Water Regional Plan (LWRP)

132. In terms of the LWRP, the information below is relevant to the application site.

- The site is located in the area covered by the Christchurch-West Melton sub-regional chapter (Chapter 9 of the LWRP).
- Catchment Name: Selwyn/ Waimakariri Plains.
- Aquifer System: Semi-confined or unconfined aquifers.
- Christchurch Ground Water Protection Zone.
- Christchurch West Melton Subregion / Water Allocation zone.

133. A full compliance check of the proposal against the LWRP including identification of permitted activities is contained in **Appendix 15**.

134. The table below includes a summary of the rules in the LWRP which the proposal requires consent under and the corresponding activity status. For completeness, consents are sought under s9, s14 and s15 of the RMA.

5.93A - 5.97 Region-wide Rules: Stormwater

Construction-phase stormwater not discharged from a Reticulated Stormwater System		
5.94B The discharge of construction-phase stormwater, other than into or from a reticulated stormwater system, into a surface waterbody, or onto or into land in circumstances where a contaminant may enter groundwater or surface water, that does not meet one or more of the conditions of Rule 5.94A.	**RD (s15)**	The construction phase stormwater discharge to land will occur on a contaminated site and the area of land disturbed from which the discharge will generate exceeds 2ha.
Stormwater not discharged from a Reticulated Stormwater System		
5.97 The discharge of stormwater, other than from a reticulated stormwater system, into a river, lake, wetland or artificial watercourse or onto or into land in circumstances where a contaminant may enter water that does not meet one or more of the conditions of Rule 5.95 or Rule 5.96; and the discharge of stormwater or construction-phase stormwater into a reticulated stormwater system that does not meet the condition of Rule 5.93A. Within the boundaries of Christchurch City.	**NC (s15)**	The operational phase stormwater discharge from roofs will occur on a contaminated site and will occur within the boundaries of Christchurch City.

5.123 – 5.127 Region-wide Rules: Take and Use Surface Water

5.126 The non-consumptive taking and use of water from a lake, river or artificial watercourse and discharge of the same water to the same lake, river or artificial watercourse is a restricted discretionary activity where conditions (1) – (4) are met.	**RD (s14)**	The damming of the drain (as part of the installation of the culvert) will result in a non-consumptive take of water and discharge of that same water into the drain. The taking of water complies with Conditions 1 – 4.

5.175 - 5.178 Region-wide Rules: Earthworks over Aquifers

5.176 The use of land to excavate material that does not comply with one or more of the conditions of Rule 5.175.	**RD (s9)**	Excavation over the unconfined or semi-confined aquifer does not comply with 5.176 as excavation exceeds 100m^3 and excavation is within 50 of the PWR.

Canterbury Air Regional Plan (Air Plan)

135. The relevant rules in the Air Plan are Rules 7.32 to 7.36 which relate to dust generating activities. As an Earthworks Management Plan (refer to **Appendix 13**) is provided as part of the application, and this includes an Earthworks and Sediment Control Plan (ESCP) and dust management measures, the activity is a **permitted activity** under the CARP.

Operative District Plan

The Operative Christchurch District Plan (District Plan)

136. The site is zoned Rural Urban Fringe in the District Plan and is subject to the following notations and overlays:

- Rural Urban Fringe Zone
- 55 dB Ldn Air Noise Contour
- 50 dB Ldn Air Noise Contour
- Christchurch International Airport Protection Surface
- Ruapuna Inner Noise Boundary Overlay
- Ruapuna Outer Noise Boundary Overlay
- Network Utility Waterway
- Minor Arterial Road - Pound RoadLocal Road - Barters Road and Hasketts Road

137. An assessment of the proposal's compliance with the applicable rules in the District Plan is set out in **Appendix 15**. Based on that assessment, resource consent is required in respect of the matters listed below, with the corresponding activity status noted:

6.2 General Rules and Procedures: Noise

6.1.5 Zone Specific Noise Rules		
6.1.5.1.5 Non-complying activities		
NC1. Any activity listed in Rule 6.1.5.1.1 P1 or P3 that exceeds the noise limits in the activity specific standards by more than 10 dB.	**NC**	Within the site (i.e. between the proposed industrial lots) noise levels could exceed the Rural Urban Fringe noise standards by more than 10dB.

6.3 General Rules and Procedures: Outdoor lighting

6.3.5 Rules -- Activity status tables -- Control of Light Spill		
6.3.5.3 Restricted discretionary activities		
RD1 Any activity listed in Rule 6.3.5.1 P1 that does not meet the activity specific standard.	**RD**	It is proposed that the Industrial General zone light spill lux levels (20 lux) apply to the site, as such the Rural Urban Fringe zone light spill levels (10 lux) will be exceeded within the site (i.e. between the proposed industrial lots). Light spill will comply at the Rural Urban Fringe zoned properties across Barters and Hasketts Roads.

6.6 General Rules and Procedures: Water Body Setbacks

6.6.5 Rules - Activity status tables - Rural Water Body Setbacks		
6.6.5.3 Restricted discretionary activities		
RD1 Earthworks: a. not exempt by Rule 6.6.3 h. and not provided for by Rule 6.6.5.1 P1; and/or b. listed in Rule 6.6.5.1 P1 that do not meet one or more of the activity specific standards; other than earthworks provided for by Rule 6.6.5.4 D1 or Rule 6.6.5.6 PR1.	**RD**	Earthworks are proposed within 5m of a network utility waterway for the construction of the development site.

6.7 General Rules and Procedures: Aircraft Protection

6.7.4 Rules - Christchurch International Airport		
6.7.4.3 Activity status tables - Birdstrike Management Areas		
6.7.4.3.3 Restricted discretionary activities		
RD2 Any activity listed in Rule 6.7.4.3.1 P3 that does not meet one or more of the activity specific standards.	**RD**	Both of the stormwater basins proposed would exceed 1000m^2 and are currently within 0.5km of each other. Refer Davie Lovell Smith Report **Appendix 13**.

6.8 General Rules and Procedures: Signs

6.8.4 Rules		
6.8.4.1.3 Restricted discretionary activities		
RD1 a. Any sign listed in Rule 6.8.4.1.1 P1 - P15 and P18 (other than P7, P8, P9 or P15), that does not meet one or more of the activity specific standards, other than: i. signs provided for in Rule 6.8.4.1.2 C1, Rule 6.8.4.1.3 RD2 - RD4; or ii. discretionary or non--complying activities in Rule 6.8.4.1.4 and Rule 6.8.4.1.5. b. In the Specific Purpose (Ōtākaro Avon River Corridor) Zone, any sign listed in Rule 6.8.4.1.1 P7 that does not meet one or more of the activity specific standards other than signs provided for in Rule 6.8.4.1.2 C1 and Rule 6.8.4.1.4 D1.	**RD**	The maximum area and height of signs attached to buildings and free-standing signs permitted in Rural zones will be exceeded and not meet P1, as it is proposed that the Industrial zone sign areas and heights in 6.8.4.2.6 apply to the future development of the site for Industrial Purposes.

7 Transport

7.4.2.3 Restricted discretionary activities		
RD1 a. Any activity that does not meet any one or more of the standards in Rule 7.4.3 unless where otherwise provided for by Rule 7.4.2.5 NC3; or any activity that requires resource consent in accordance with Rule 7.4.3.10 - High trip generators except where otherwise provided for by Rule 7.4.2.2 C1.	**RD**	The proposal will not comply with the following standard: 7.4.3.8 Vehicle crossings – the sight distance requirements (113m) for a 50km/hr road may not be achieved for Lot 29.

8 Subdivision, Development and Earthworks

8.5.1.4 Discretionary activities - Subdivision		
D1 Subdivision in a rural zone resulting in allotments that does not meet the minimum net site area standards in Rule 8.6.1, unless specified otherwise.	**D**	Lots smaller than 4ha are proposed.
8.9.2.3 Restricted discretionary activities - Earthworks		
RD1 Any activity listed in Rule 8.9.2.1 P1 or Rule 8.9.2.2 C1 that does not meet any one or more of the activity standards.	**RD**	The maximum volume and depth of earthworks for Rural zones will be exceeded for construction of the subdivision and when the site is developed for industrial buildings and activities.

17.5 Rural: Rules - Urban Fringe Zone

17.5.1 Activity status tables - Rural Urban Fringe Zone		
17.5.1.3 Restricted discretionary activities		
RD1 Any activity listed in Rule 17.5.1.1 P1-P19 and Rule 17.5.1.3 RD2-RD9 that does not meet one or more of the built form standards in Rule 17.5.2, unless otherwise provided.	**RD**	The proposal does not comply with Rule 17.5.2.7 – vehicle trips.
17.5.1.5 Non-complying activities		
NC1 Any activity not provided for as a permitted, controlled, restricted discretionary, discretionary or prohibited activity.	**NC**	General Industrial activities are not provided for in the Rural Urban Fringe Zone and are therefore non-complying. As industrial activities are not provided for in the zone the Rural Urban Fringe built form standards will be breached when future development of the site for industrial activities occurs. The proposal is to replace these with the General Industrial built form standards.

Assessment of Actual and Potential Effects on the Environment

FTAA2024 Effects Framework

138. Clause 5(4) in Schedule 5 of the Act specifies that:

> (4) A consent application must include an assessment of the activity's effects on the environment that—
>
> (a) includes the information required by clause 6; and
>
> (b) covers the matters specified in clause 7.

139. Clause 6 specifies information requirements for an application and AEE, as follows:

> **6. Information required to assess environmental effects**
>
> (1) The assessment of an activity's effects on the environment under clause 5(4) must include the following information:
>
> (a) an assessment of the actual or potential effects on the environment:
>
> (b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use:
>
> (c) if the activity includes the discharge of any contaminant, a description of—
>
> (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and
>
> (ii) any possible alternative methods of discharge, including discharge into any other receiving environment:
>
> (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity:

(e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal:

(f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision:

(g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved:

(h) an assessment of any effects of the activity on the exercise of a protected customary right.

(2) A consent application need not include any additional information specified in a relevant policy statement or plan that would be required in an assessment of environmental effects under clause 6(2) or 7(2) of Schedule 4 of the Resource Management Act 1991.

140. The information listed above in Clause 6 is included in this AEE and in the appended technical reports, to the extent relevant.

141. Clause 7 specifies matters to be covered in an AEE:

7. Matters to be covered in assessment of environmental effects

The assessment of an activity's effects on the environment under clause 5(4) must cover the following matters:

(a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:

(b) any physical effect on the locality, including landscape and visual effects:

(c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:

(d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:

(e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:

(f) any unreasonable emission of noise:

(g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.

142. Taking guidance from the relevant statutory planning documents, including objectives, policies, rules, and the associated matters of discretion or control, a number of specific actual or potential effects of the activity have been identified. These effects are identified and assessed individually but are grouped in the following section with reference to each of the listed matters in clause 7 for clarity.

Scope of Assessment

143. Taking guidance from the relevant statutory planning documents, including objectives, policies, rules, and the associated matters of discretion or control, a number of specific actual or potential effects of the activity have been identified.

144. We understand that specific effects may relate to more than one effect classification under (a)-(g) of Clause 7, Schedule 5 however for simplicity and to avoid repetition these effects have been identified and assessed individually but are grouped in the following section with reference to each of the listed matters in clause 7 for clarity.

Clause 7, Schedule 5 Matters:	Specific Effects Assessed
(a) Any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:	· Economic Effects (including sufficiency of industrial development capacity)
(b) Any physical effect on the locality, including landscape and visual effects:	· Landscape and Visual Amenity Effects · Urban Design Effects · Transport Network Effects · Regionally Significant Infrastructure and Reverse Sensitivity Effects · Climate Change and Green House Gas Effects · Highly Productive Soils and Rural Production · Three Waters Infrastructure · Water Quality Effects (Ground and Surface Water)
(c) Any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:	· Ecology and Biodiversity Effects (Herpetology, Terrestrial, Freshwater and Avifauna)
(d) Any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:	· Cultural Effects
(e) Any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:	· Earthworks and Land Contamination Effects
(f) Any unreasonable emission of noise:	· Noise Effects
(g) Any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.	· Geotechnical and Natural Hazard Effects

Classification of effects

145. The adverse effects listed above are assessed and summarised in the following section of this report with reference to the descriptions and continuum of effects in **Table 1**.

Table 1. Terminology used to describe an effect's significance

Descriptor of an effect's significance	Meaning
Nil effects	No effects

Less than minor adverse effects	Adverse effects that are discernible but too small to have any meaningful impact
Minor adverse effects	Adverse effects that are noticeable but not at a concerning level, and mitigation or remediation may not be necessary
More than minor adverse effects	Adverse effects that are noticeable and may cause a serious adverse impact but could be potentially mitigated or remedied
Significant adverse effects (that could be remedied or mitigated)	An adverse effect that is noticeable and will have a serious adverse impact on the environment but could potentially be mitigated or remedied.
Unacceptable adverse effects	Significant adverse effects that cannot be avoided, remedied or mitigated

Actual or Potential Effects

(a) Any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:

Economic Effects

146. The economic effects of the proposal are addressed in the Economic Assessment prepared by Savvy Consulting Limited (**Appendix 16**) which also draws on the findings in the Industrial Land Market Assessment by Colliers **Appendix 17**. These reports are considered in the subsections below:

Industrial Land Market Assessment

147. Mr. Gary Sellars, a Registered Valuer at Colliers, has provided an in-depth analysis of the Greater Christchurch vacant industrial land market in order to assist with identifying the economic benefits of the Pound Road proposal (see **Appendix 17**).

148. In regard to industrial land supply, Mr. Sellar's assessment finds that the current vacant industrial land supply in Christchurch City is 474.8 hectares, and in Greater Christchurch (including Selwyn and Waimakariri Districts) it is 786.9 hectares. From a demand side, the average annual take-up of industrial land in Christchurch City from 2018 to 2022 was 58.1 hectares, with a significant increase to 84.0 hectares per annum in the last two years. For Greater Christchurch, between September 2020 and June 2020, the take-up was 57.4 hectares per annum.

149. Relevantly, this assessment finds that there is *"only a limited supply of vacant land across the Greater Christchurch area with this diminishing supply resulting in significant land price escalation over the last four years where land values have increased by as much as 75% over this period"*. The assessment points out the important distinction between land that is freely available and land which is not available to the market or which constitutes a different market in terms of supply and demand, including land owned by the Crown and territorial authorities, or land that is only available in the form of leasehold tenure (such as that owned by Calder Stewart and CIAL).

150. Accounting for this distinction, the Colliers report finds that for Christchurch City:

- Excluding land owned by the Crown, CCC, ECan and CIAL, the current supply of vacant industrial land will be exhausted in approximately 7.7 years; and
- If the NPS-UD competitiveness margin of 20% in the short and medium term is factored in, the current supply of vacant industrial land will be exhausted in 6.4 years.

151. Evaluating the supply and uptake of the preferred IG and Industrial Heavy (IH) zones, Colliers find that the existing supply of IG and IH zoned vacant land will be exhausted in 6.4 years and 9.6 years respectively when the 20% competitiveness margin is factored in.

152. Colliers further state that *"our forecast of existing supply data presents an optimistic picture and does not take into account whether or not the land is actually available to the market or suited to market preference in terms of location and zone type"*.

153. On the basis of this analysis, it is clear that there is a shortage of supply of vacant industrial land in Christchurch, and that supply will likely be exhausted in the short-medium term.

154. Colliers' evaluation goes further and examines the specific industrial 'locality and market' supply and demand characteristics in the vicinity of Islington Hornby-South locality. They note that there is only 157 hectares (approximately) of freehold industrial land which is vacant and potentially available for development and even if this supply of land is supplemented by that proposed in this application, capacity in this location would be exhausted in 6 years (inclusive of the NPS-UD competitiveness margin of 20%). Accordingly, Colliers conclude that:

- There is a limited supply of vacant industrial land across the Greater Christchurch area, leading to significant land price escalation; and
- The Islington Hornby-South industrial market faces a severe shortage in terms of capacity in the short-medium term.

155. The Site is a logical addition to the industrial district in the south-west Hornby locality where there is an extreme shortage of vacant freehold industrial land which is readily available for development. Development of the site for Industrial General purposes would contribute to satisfying the pent-up demand for land in this locality, close to strategic infrastructure such as the State Highway (providing accessibility to the Port of Lyttelton and the Inland Port) as well as Christchurch International Airport.

Economic Costs & Benefits

156. Savvy Consulting have provided an economic assessment of the proposal, which considers the project in the context of industrial development capacity and otherwise evaluates the economic costs and benefits of the proposal (**Appendix 16).**

157. That assessment finds that:

158. The project aligns with the purpose of the FTAA2024 insofar that it will deliver "significant regional or national benefits", including driving regional economic growth, creating employment opportunities, and contributing to Canterbury's broader development objectives.

- The project also provides much needed development capacity for industrial land in the vicinity of the south-west Hornby locality and for the logistics sector in Christchurch generally, with associated economic benefits.

159. In drawing this conclusion, Savvy Consulting makes the following key findings on industrial development capacity in Christchurch city, in the south-west locality, and in the warehousing and logistics sector:

- **High demand locality:** The site is located in an area of Greater Christchurch which is characterised by 'very high demand relative to other industrial localities'. The site is considered suitable (feasible and reasonably expected to be realised) for industrial development, due to its accessibility to major transport routes and freight ports, potential for co-location, flat and contiguous area, low natural hazard and ecological values.

- **Christchurch-wide Capacity Constraints for Logistics:** Christchurch lacks sufficient development capacity for the logistics sector, which is likely hindering economic growth.

- **The NPS-UD:** requires sufficient development capacity to meet the demands of different business sectors and the proposal helps fulfil this requirement.

160. Drawing on the points above, Savvy concludes that the 60.4ha development proposed will help to address shortfalls in industrial and logistics sector development capacity in the vicinity of Islington Hornby-South and Christchurch City generally.

161. Savvy otherwise identifies **significant economic benefits** that will be generated by the project, including:

- **Increased Business Land Supply:** by providing 42ha of net development capacity, the proposal will provide a valuable and significant contribution to vacant industrial development capacity in the locality and wider region.

- **Supporting a competitive land market:** by way of increased land supply, reducing monopolistic pricing, improving efficiency, and benefiting buyers and developers.

- **Generating significant value added (GDP):** the development phase is estimated to contribute $568 million in total value added to the Greater Christchurch economy over an indicative 16.5 years.

- **Creating employment opportunities:** total employment for around 4,290 FTE years across a broad range of sectors in Greater Christchurch, equivalent to approximately 260 full-time workers on average for 16.5 years.

- **Long-term Economic Contribution:** Provides ongoing economic stimulus through business operations and supply chain linkages.

162. By comparison, Savvy considers the **economic costs** of the project are limited. The development will remove the productive capacity of the land, although this is expected to be limited to the existing productive land at 173 Pound Road due to water and nitrogen loading contaminants that

would permanently constrain any further intensification of primary production on the site above the current baseline. The loss of HPL in the context of HPL in the district is minimal.

163. In conclusion, Savvy Consulting consider that:

- The proposed site is a suitable and effective location for industrial development that will deliver substantial economic benefits at a regional scale, the addition of 42.3ha of development capacity is significant in the context of Policy 8 of the NPS-UD and the region.

- Providing additional development capacity in Islington-Hornby South responds to a high relative demand for (purchasable) industrial land in this part of Greater Christchurch.

164. Accordingly, having considered the economic costs and benefits of the proposal, the tests of Clause 3.10(1) of the NPS-HPL and the objectives and policies of the NPS-UD, the proposal is supported from an economic perspective and is considered to deliver significant regional benefits.

Conclusions - Economic Effects

165. The assessments provided by Savvy Consulting and Colliers, as summarised above, point to a consistent picture of:

- High demand for industrial land in Greater Christchurch, Christchurch City, in the south-west Hornby locality, and in the warehousing logistics sector, and

- A shortage of supply of unencumbered, freehold, vacant industrial land in Greater Christchurch and Christchurch City, and especially in the south-west area where the current supply will be exhausted in the short-medium term.

166. These reports also conclude that the proposal will help to address this supply/demand imbalance and the shortfall in the south-west Hornby locality.

167. Aside from the associated benefits of providing much needed development capacity, additional economic benefits will be derived from the project in the form of enhanced industry co-location, market competition, and direct economic benefits through the construction and ongoing/operational phases of the project. Conversely, there will be modest economic costs associated with the loss of rural land and production. For these reasons, Savvy makes the following conclusions:

- The proposed site is a suitable and effective location for industrial development that will deliver substantial economic benefits at a regional scale.

- The addition of 42.3ha of net development capacity within the industrial locality experiencing the highest land demand in Greater Christchurch is significant in the context of Policy 8 of the NPS-UD and the region.

- The economic costs of the project are minimal and therefore do not need to be taken into account in terms of an assessment under s85 of the Act. Having considered the economic costs and benefits of the proposal, the tests of Clause 3.10(1) of the NPS-HPL, and the objectives and policies of the NPS-UD, the proposal is supported from an economic perspective.

- Savvy is firmly of the view that approval of the project would strongly align with the purpose of the Act to *"facilitate the delivery of infrastructure and development projects with significant regional or national benefits".*

168. Based on the evaluation above, the project is concluded to have low economic costs and significant economic benefits.

(b) Any physical effect on the locality, including landscape and visual effects:

Landscape and Visual Amenity Effects

169. The effects of the proposal on landscape and rural amenity values have been assessed by Novo Group Limited. The report is attached as **Appendix 11** and also provides a graphic supplement and landscape concept plans for the assessment.

170. Novo Group, in consultation with the herpetologist and the aquatic ecologist, has provided a planting plan and list for the 5m landscape strip along Barters Road, and street tree planting. These are expected to have a positive effect in terms of increasing canopy cover and indigenous biodiversity on site, assisting to reestablish lizard habitat as well as providing an ample visual buffer to the rural properties adjacent Barters Road.

171. The proposed industrial development at Pound Road is expected to have several effects on the landscape character and values of the area. These have been evaluated at a wider area scale and a local (adjacent property) level.

172. At a wider scale, Novo Group considers the proposal to be an appropriate addition to the existing landscape given the mix of rural-residential, agricultural, and industrial land uses in Christchurch's western rural-urban fringe, which is also heavily influenced by activities at the existing Waterloo Business Park, Ruapuna Speedway and nearby quarries. The development is seen to align well with existing mixed land uses and patterns of industrial development in the area. This semi-rural landscape tends to hold many of the functional requirements of communities, such as transport (e.g. state highways) and industry, having greater capacity to absorb such functions through being in proximity for logistical reasons, yet distanced from more sensitive urban areas. Proposing further industrial development in the area is therefore not considered inappropriate or out of place in the landscape context.

173. Looking from the northern aspect and from the section of Pound Road adjacent to the site, no landscape strip is proposed, and so open views to the industrial subdivision will be possible. These viewpoints already feature views of industrial activity, and so an industrial presence is already part of the visual character. Although the site will undergo a significant change, from these wider area outlooks it is not expected to appear unusual or out of place. At an area wide level Novo Group has assessed the landscape and visual amenity effects as low to moderate. Using the above scale of effects table this equates to a minor and acceptable effect on the wider environment.

174. From a planning perspective, it is noted that rural / industrial and open space / industrial interfaces occur in a number of locations across the city. Effects as assessed above are common at these interfaces and are anticipated by the CDP where they occur. As set out within **Appendix 11**, Novo Group consider that views from the Open Space zone (Golf Course) are already varied across the grounds, and in parts already contain views towards the large area of industrial land to the south (Waterloo Business Park), which provides some context to the proposed site. For

this reason, it is considered appropriate that the built form standards (e.g. road setback and internal boundary setback) of the IG Zone apply to the site with the only modification being the 5m planting strip along the Barters Road frontage to provide a buffer to the waterway and mitigation for the infilling of the drain within the site, a 3m building setback and planting of one tree per 10m of boundary along the interface of the Open Space Community Parks Zone (Templeton Golf Course) to the north. Novo Group have prepared an indicative planting plan for the Barters Road landscaping strip with planting varied in height in texture to provide visual amenity screening along the boundary adjacent to the existing rural-residential dwellings along Barters Road. With regard the 3m building setback to the Open Space Community Parks Zone, Novo Group consider the proposed setback and planting of trees will act to accommodate the open space and amenity values from the recreational area.

175. In addition to the above change of land use and built form, Novo Group has also considered an increase in signage along both Pound, Barters and Hasketts Roads. The proposed activities will comply with the applicable rules in the District Plan that manage glare and light spill, including at the interface between rural and industrial zones. In relation to signage, given the absence of or low numbers of internally lit signs, Novo Group considers that the amenity of rural properties surrounding the site will be maintained to the levels accepted by the District Plan.

176. Regarding landscape and visual amenity effects, the proposed mitigation that forms conditions of consent includes:

- The 5m wide native planting strip along Barters Roads (to be installed at time of subdivision),
- Street tree planting within the road corridors,
- Christchurch District Plan IG Zone built form standards to apply, and
- No digital or LED billboards/signs.

177. Overall, the landscape and visual effects of the proposed industrial subdivision are assessed to be low-moderate, with moderate effects on residents directly adjacent to the site. When evaluated in the Fast-track framework outlined above these effects are not considered significant.

Urban Design Effects

178. The effects of the proposal on urban form and design have also been assessed by Novo Group. The Urban Design report is attached as part of **Appendix 11**. As well as describing the proposed changes to urban form, an assessment against the 'seven C's' of the New Zealand Urban Design Protocol, being Context, Character, Choice, Connections, Creativity, Custodianship and Collaboration has been undertaken.

179. The proposed industrial subdivision at Pound Road is expected to have urban form effects given the proposed change of land use from a RUF to what will essentially function as an IG zone. The proposal will introduce urban activities to the application site, which represents a marked difference compared to the current rural nature of the site.

180. As set out within the above assessment on visual landscape effects, Novo Group acknowledges that the site will go through a change as it transfers from a rural land use to industrial. Nonetheless, Ms Wilkins considers that the proposal will support future industrial growth through

the range of lot sizes and configurations, incorporating good urban design practices in alignment with the New Zealand Urban Design Protocol, the MfE Principles and the NPS-UD.

181. Overall, the urban design assessment concludes that the proposed industrial subdivision at Pound Road and future development in accordance with the IG Zone rules is supportable from an urban design perspective and is not anticipated to not have any adverse urban design related effects, considering the location, existing context, and alignment with urban design principles and planning policies.

Transport Effects

182. The transport effects of the proposal have been assessed by Novo Group. The Integrated Transport Assessment is attached as **Appendix 10** and is based on the Davie Lovell-Smith Scheme Plans in **Appendix 3**.

183. Firstly, with regard access, the site will be provided with vehicle access to all frontages, albeit they will be constructed across the different stages of the subdivision. Access locations are summarised below:

- Primary site access will be via a roundabout on Pound Road, to be constructed as part of Stage 2 of the subdivision.
- Two priority intersections are proposed for site access, one of Barters Road and one on Hasketts Road. These will include right turn bays on the major roads.
- The existing carriageway of Barters Road and Hasketts Road will be widened along the site boundary to add sealed shoulders, resulting in a 9m sealed width with a 7m carriageway. The widening will occur when site access intersections are constructed to these roads.
- When the Hasketts Road site access is constructed, further upgrades to the intersection of Barters / Hasketts / Maddisons Road are proposed. This upgrade will occur when the Hasketts Road site access is constructed.
- All individual lot access will be internal to the subdivision.

184. Recognising the change in use from rural to industrial, the proposed industrial development is anticipated to generate 856 vehicle movements per hour in the AM peak, 780 vehicles per hour in the PM peak and 9,736 vehicles per day. In order to understand the potential effects of this generation, traffic modelling has been undertaken by QTP to supplement the traffic assessment. The modelling provides an understanding of the existing operation of the network, and a baseline of 2038 without the development and in 2038 with the development.

185. Novo Group notes that a key effect on the network is the operation of the SH1 / Pound Road and Pound Road / Waterloo Road intersections. Notably, existing queuing on the Pound Road approach to SH1 across the rail corridor affects the capacity of the Pound Road / Waterloo Road signals, and in Novo Group's opinion this is an existing safety concern that currently warrants consideration of an upgrade.

186. The modelling undertaken by QTP 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.

187. The assessment notes that to address existing and future capacity and safety concerns, upgrades are recommended for the SH1 / Pound Road / Waterloo Road intersections, specifically an additional right turn lane from Pound Road to SH1 and an additional southbound lane on Pound Road to Waterloo Road. It is recognised that the width for this upgrade exists within the designation road corridor, so the work to provide for this additional lane will be relatively straightforward to deliver.

188. The purpose of the FTAA is to 'facilitate' the delivery of development that provides regionally significant benefits. The development is a listed project within the Act, and the above economic advice demonstrates that the proposal will provide significant benefits, as well as addressing a shortfall in development capacity in this locality and within Christchurch. Recognising that the upgrades to this corridor are needed regardless of the application, and secondly that the upgrades are outside of the control of the authorised person, this should not form an impediment to the development.

189. To this extent, a condition of consent is considered a feasible method to give certainty toward the development whilst also providing sufficient time for NZTA to plan and fund for the upgrade. The condition of consent would delay the issuing of titles for the Lots until 31 December 2027, which would in turn delay-built development and associated traffic from the development, allowing for the upgrade before any adverse traffic effects arise. Consultation with NZTA was undertaken on 19 June 2025 to discuss the condition and proposed timeframe.

190. Further to this consultation, additional modelling was undertaken by QTP to assess the incremental effects of the development at the SH1 / Pound Road and Pound Road / Waterloo Road intersections. This was undertaken on the assumption of the above volunteered condition, and that development at the site will occur evenly from 2028 – 2038. The results of this modelling determined that the SH1 / Pound Road intersection is anticipated to require upgrading by 2030/2031, by which time 30% of the development will be generating traffic. For the Pound Road /Waterloo intersection the modelling determined that the intersection would require upgrading by 20233 / 2034 with 60% of the development generating traffic.

191. Based on the above, there is five – six years for NZTA and CCC to plan, fund and upgrade these intersections. As such, the proposed condition of consent is appropriate when considered within the overall context of the FTAA.

192. With regard to other transport network effects, the ITA notes:

- The operation of the SH1 / SH73 intersection is identified as being an existing issue that would also be exacerbated by the development. NZTA is planning on upgrades to this intersection, and the effects of the proposed development traffic at the intersection are acceptable noting that the level of effect would not occur until 2038 and that NZTA have funding in place for improvement works by 2034.

- The modelling identifies capacity constraints at the SH1 / Marshs Road intersection during the weekday PM peak. Again, based on the modelling it is understood that these are largely existing capacity issues, which will arise regardless of the development. In Novo Group's opinion the effects of the increased development on this intersection will not be unacceptable.

- The modelling report does not highlight any issue at Hasketts Road and Maddisons Road intersection, however Novo Group has considered the potential effects recognising the scale of increase in traffic on these roads and their classification (local roads). The modelling demonstrates that the development will increase traffic on these roads, although to a lesser degree than what is anticipated through the background traffic increases already anticipated in the area. To manage this effect, it is proposed to upgrade the Barters Road / Hasketts Road / Maddisons Road intersection to better accommodate traffic turning right from Hasketts to Maddisons. This upgrade will only be provided through Stage 4 of the subdivision, when access is taken to Hasketts Road, as there is otherwise little traffic demand heading around the bend.

193. Based on the above, Novo Group considers that the internal design of the development will manage traffic effects appropriately, such that a safe and efficient transport environment will arise. With respect to off-site / network effects, the modelling demonstrates that there are a number of known or emerging issues in the vicinity of the site which will increase as a result of general growth as well as due to the development. Whilst the majority of these issues will not result in unacceptable effects, the intersection of Pound Road / Waterloo Road / SH1 is a key intersection with capacity constraints that the proposal will exacerbate. Notwithstanding, subject to the recommended condition of consent and upgrade occurring, Novo Group concludes that the proposed activity is expected to have acceptable and no more than minor transport effects, based on the suggested upgrades to the Pound Road / Waterloo Road/ SH1 intersections being undertaken in a timely manner.

194. The advice set out within the assessment is accepted and relied on for the purpose of this assessment.

<u>Regionally Significant Infrastructure and Reverse Sensitivity Effects</u>

Birdstrike Risk

195. The proposed SMA's require consent pursuant to Rule 6.7.4.3.3 RD2 (Birdstrike Management) as they do not meet one of the activity specific standards in P3 requiring that the combined area of all stormwater basins and/or water bodies (that are wholly or partly within 500m of the proposed water body or stormwater basin's edge) does not exceed 1000m². As guided by the CDP, consideration is required in relation to the scale and significance of bird strike risk likely to be created by the proposal and mitigation of the risk, including by design measures, operation or management procedures, direct intervention practices and monitoring. Further, as a non-complying activity the change of land use to industrial also needs assessing in terms of any increased birdstrike risk.

196. The scale and significance of risk created is very low given the size and context of the stormwater basins which are small scale and have been designed by a stormwater engineer to fully drain within 48 hours of the cessation of a 2% AEP storm with sufficient rapid soakage overflow capacity to minimise any ponding of stormwater outside the infiltration area. It is noted that such mitigating drainage requirements are proposed to form consent conditions. Further, the characteristics of the stormwater basins should not result in any increase in avifauna water habitat attractants due to fast infiltration rates. Any planting within the SMA's will be from list in Appendix 6.11.9 of the CDP to avoid bird attracting species.

197. Subject to appropriate design, the stormwater management areas will not have an adverse impact upon Birdstrike risk.

Reverse Sensitivity

198. Reverse sensitivity relates to the potential for a new activity (in this case the proposed industrial uses) which may be sensitive to effects generated by an existing lawful activity (e.g. aircraft noise at CIA and Ruapuna Speedway) to generate complaints. The risk is that such complaints may lead to restrictions or limitations on the existing activity. The mere presence of adverse effects on neighbours or, for that matter, complaints in the absence of adverse effects does not necessarily produce reverse sensitivity effects. It is the potential for restrictions or limitations on the operation of the existing lawfully established activity as a result of those complaints that represents the effect.

199. Reverse sensitivity concerns for CIA and Ruapuna Speedway primarily relate to complaints about noise from 'sensitive activities' such as residential uses, guest accommodation, education activities, retail activities, commercial services and offices.

200. To address this potential effect, the conditions proposed in the application specifically exclude residential activities, residential units, visitor accommodation and education facilities from the activities sought in the consent. It is also noted that the IG Zone provisions that are proposed to apply to the site do not permit commercial services and only provide for retail and office activities ancillary to industrial uses. Stand-alone office activities would not be provided for. Ancillary office and retail components of industrial uses would be required to meet the acoustic insulation requirements of rule 6.1.7.2.2 (Activities near Christchurch Airport). This reduces the potential for complaints that may in turn result in curtailing of CIA or Ruapuna Park activities.

201. Overall, it is considered the proposal will not result in any unacceptable reverse sensitivity effects.

<u>Climate Change and Greenhouse Gas Emissions</u>

202. Lumen have carried out a Greenhouse Gas Emissions Overview of the proposal. Lumen's report is attached as **Appendix 19**. The relevant and key points of their assessment are summarised below:

- The centre of the site is approximately 1km from the centre of Waterloo business park, 2.5km from the Templeton residential area and 2.5km to the residential area of Hornby. It has excellent accessibility and connectivity to Canterbury's strategic arterial road network.

- The site is flat, with good ground conditions which means the amount of embodied carbon required in building foundations (a key component of building emissions) is limited.

- The proposal leverages existing infrastructure, meaning minimal new infrastructure (and embodied carbon) is required to be developed.

203. Overall, Lumen considers that the proposed industrial subdivision and development will contribute to a reduction in greenhouse gas emissions and fundamentally meets requirements for supporting emissions reductions. They conclude that the proposal does not give rise to significant adverse effects related to greenhouse gas emissions.

204. In addition to the above, Lumen identifies that there are multiple opportunities to further enhance sustainability and energy efficiency within the development. These opportunities are not essential but could strengthen the development's long-term environmental performance. Such initiatives would need to be developer imposed or encouraged or voluntarily adopted by future business activities establishing and as such measures may not be feasible for all activities establishing. NTP will encourage use of energy and water efficient technologies are possible.

205. In conclusion, based on the advice received from Lumen any climate change and greenhouse gas related adverse effects are less than minor and acceptable.

Highly Productive Soils and Rural Production

206. The site is classified as having LUC class 2 soils and is currently used for grazing purposes, with rural production also occurring at 173 Pound Road. Given the proposed change of use to industrial activity the productive potential of the versatile soils at the site will be lost.

207. The NPS-HPL requires regional councils to map highly productive land in their regional policy statements within three years of the NPS-HPL coming into force. In the interim period before mapping occurs, land must be treated as highly productive land for the purposes of the NPS-HPL if it, at the commencement date: is zoned General Rural or Rural Production; and is zoned LUC 1, 2, or 3; but is not: identified for future urban development; or subject to a council initiated, or an adopted, notified plan change to rezone it from general rural or rural production to urban or rural lifestyle.

208. Legal advice attached as **Appendix 24** has been obtained addressing whether the site, which is zoned Rural Urban Fringe, is a "General Rural or Rural Production Zone" for the purpose of the NPS-HPL. The legal advice is that the site is not zoned General Rural or Rural Production and therefore the NPS-HPL does not apply under the definition of highly productive land.

209. An assessment against the NPS-HPL has nevertheless been undertaken in case the panel adopt a different interpretation and decide that the RUF does constitute a General Rural or Rural Production zone and the NPS-HPL is therefore relevant. A full assessment of the provisions in the NPS-HPL is set out in **Appendix 23** and summarised in the section of this AEE titled 'Relevant Provisions of Planning Instruments'. Otherwise, evaluation of the proposal's effects on versatile soil resources and rural production is set out below, with reference to the NPS-HPL framework.

210. The NPS-HPL provides a framework for assessing a change of land-use from rural to urban on highly productive land (e.g. policies 7, 8, and 9 and clauses 3.6, 3.8, 3.9 and 3.10). Whilst this proposal is for resource consent rather than 'urban rezoning', the implementation provisions in the NPS-HPL concerned with rezoning (and clause 3.6 especially) provide relevant guidance to this application insofar that it proposes to urbanise rural land.

211. Whilst the provisions of the NPS-HPL restrict urban rezoning except in specific circumstances, its policies aim to balance development needs with the importance of maintaining land for agricultural and horticultural purposes.

212. Effects on versatile soils and rural production have been assessed by Reeftide Environmental & Projects Limited (Reeftide) with reference to NPS-HPL framework. Reeftide's assessment is attached as **Appendix 20.** In summary the key points of this assessment are as follows:

- Site-specific constraints affecting the agricultural productive potential of the site include moisture deficits and the limited availability of irrigation water in this allocation zone. Without sufficient irrigation, the LUC 2 soil within the site will never achieve its full productive potential and will remain limited.

- Nutrient limits in the Christchurch West Melton Nutrient Allocation Zone (a 'Red' zone), are identified as a long-term constraint that compromises the productive potential and economic viability of the soils on site.

- The current low productivity across the site and the inherent limitations due to water availability and nutrient restrictions indicate that the use of the land for land-based primary production is not economically viable.

- The potential for fragmentation of large geographically cohesive areas of highly productive land is not a concern. The proposal does not seek to fragment the land; it does the opposite as the proposed development area encompasses multiple titles. As noted, the land parcels individually or combined are not HPL, therefore the integration of the lots has no land based productive use benefits.

- Reeftide (see **Appendix 20)** concludes that there are multiple long-term constraints on the capacity of the site to support primary production activities. The productive potential of the soil is already constrained by factors such as limited irrigation water and nutrient restrictions. Reeftide otherwise notes that the proportion of highly productive land that the site represents within the Canterbury Region (0.006%) and Christchurch District (0.54%) is insignificant. Overall, Reeftide's assessment considers that the proposed industrial development is a more suitable land use considering these existing constraints and the potential risks associated with agricultural activities near the airport, rather than directly causing negative effects on the soil itself.

213. Savvy Consulting has also considered the **economic costs** of the potential loss of highly productive soils (see **Appendix 16**). Savvy concludes that under Clause 3.10(1) of the NPS-HPL, the proposal is supported from an economic perspective the benefits of the proposed development outweigh the costs associated with eh loss of long-term capacity for land-based primary productions.

214. For completeness, it is also noted that the proposed industrial use of the site will not have any significant reverse sensitivity impacts on surrounding land-based primary production. Industrial activities are not typically sensitive to neighbouring agricultural practices, and the site will not directly adjoin rural land use. There are existing examples of industrial and rural activities coexisting in the district, suggesting they are not inherently incompatible.

215. In conclusion, legal advice is that the NPS-HPL does not apply to the subject land, but in any event (and even accounting for the NPS-HPL framework), the proposal's effects on versatile soil resources and rural production will be minor and acceptable.

Three Waters Infrastructure

Water Supply

216. Water supply is a known constraint in the locality of the site, as the Islington suburban water supply is largely dependent on a series of booster pumps on Foremans Road, near its intersection with Main South Road. Water supply modelling was undertaken by Opus on behalf of CCC to confirm the effect of the proposed development on the network.

217. From the modelling three proposed options were considered, including:

- Upgrading the existing network;
- Installing a new bore on the site to boost supply and pressure; or
- Installing a water supply tank and pumps to provide buffering during base demand and for firefighting supply.

218. Option 1 and 2 both have a significant cost to the development. Option 1 would involve extensive disruption to the surrounding businesses and road users and would be heavily reliant on Council support to facilitate the upgrade. Aside from the cost, option 2 would involve complexity with regard to obtaining consent from the Regional Council for the installation of a new bore, take of groundwater, and transfer of allocations and required consents to Council.

219. Option 3 is therefore considered the most favourable option for the development. This would provide buffering of peak base demand, and ensure the existing network is not suffering excess headloss during these periods. This option would also provide necessary fire supply volume, flow and pressure without compromising the existing network.

220. The proposal therefore proposes to install a new 200mm watermain connecting to the existing 200mm watermain at the intersection of Waterloo and Pound Road, extending this new main into the development to Lot 202. Lot 202 will contain the proposed tank and pump infrastructure, from which a network of mains will be extended through the road network of the development. The layout of the tanks and mains are shown within the Engineering Concept plans.

221. The provisional sizing of the tank is based on achieving FW4 fire hazard category and providing sufficient buffering in the network, and further detail on the volume and firefighting flow is included within the Infrastructure Report. The tank will be serviced by a pump set designed in accordance with CCC IDS and supplementary CCC pumping station and reservoir design guides. A condition of consent is volunteered to require the final sizing of the tank to be confirmed during detailed design, based on an updated model from Opus incorporating the proposed servicing strategy and maximum available supply flow rate from existing Council infrastructure to the site.

222. For completeness, the above options have been presented to Council's 3waters team during preliminary consultation (21 May 2025). At the time Council did not confirm a preference, and a set of water supply conditions were provided for the proposed option 3. These conditions are considered suitable for the proposed option, as adopted within **Appendix 14**. However, a follow up meeting was held on 4 July 2025 whereby Council commented that their preference was option 1. Option 1 is preferred as they consider that the proposed option 3 has potential water quality risks and a high ongoing maintenance requirement for Council. Further, they do not consider a sufficient fire demand rating would be achieved with the proposed option.

223. In response to this, it is noted that there are concerns from DLS with regard to option 1 (as set out in **Appendix 12**), noting the fact that it does not address the lack of redundancy in the network, as the development would still be solely reliant on the booster pump station and the single feed from booster pumps. Redundancy is a positive feature within an industrial zone due to the potential fire risk nature of some industrial activities. Further, with regard to fire demand, purchasers will be aware of the demand provided and the need to provide for upgrades should their activity not be suitable for FW4. To this extent, option 3 is maintained as being the most appropriate method to service the development.

224. Accounting for the conditions, any effects on water supply to the site and on the wider network are considered minor and acceptable.

Wastewater

225. Wastewater is also a known constraint in the locality of the development site. Whilst the existing gravity network is currently sufficient and can cater for the development in both dry and wet weather flows, with future growth (including two potential plan changes) there are capacity constraints confirmed in the model.

226. Six different scenarios were modelled by Opus on behalf of CCC as part of preliminary design considerations, refer to the Infrastructure Report (see **Appendix 12**) for the scenarios and results. Based on this, two main servicing options have been considered for the development, being:

- A gravity network with either a downstream pump station upgrade or storage tank within the development site to buffer flows; or
- A Local Pressure Sewer (LPS) network with each lot to provide storage within their pump and tank unit corresponding to their expected wastewater discharge established at the time of building consent.

227. Option 2 is the preferred strategy for the development, as it will enable the development to progress without requiring alteration to the existing Council network or vesting a large storage facility to Council that would incur ongoing maintenance cost.

228. Providing LPS connections to each site, with the site then providing the required storage based upon the end use is the most effective outcome. It is well known that there can be a large variance in sewer discharge volumes depending on end use of an industrial allotment, this way excessive storage or upgrades are not required based on a worst-case scenario that may never eventuate.

229. Each lot will be required to provide 24hrs average dry weather flow storage, and therefore the level of storage provided will be suited to match the proposed demand on the system from that individual lot. The LPS option also allows Council to maintain a level of control over the discharge from each lot via the IOTA OneBox Control Panel if desired. This adds a further layer of buffering into the system with discharges able to be controlled by Council to allow off-peak discharge and holding of discharge in emergency situations. It is recognised that Council have imposed a sewer discharge limit of 0.09l/s/ha, controlled by way of consent notice on new titles, on development sites in the surrounding area. It is expected that a similar limit will also be applied to this site. This corresponds to a flow rate of 5.4l/s from the site with the tanks on each lot providing the buffer.

230. The above methodology and design have been discussed with Council during preliminary consultation. As above, Council did not initially provide a preference to the proposal and instead

provided suggested conditions of consent for the proposed LPS, which are adopted as part of the application. During a follow up meeting (4 July 2025) however, Council confirmed that their preference is for a gravity system as opposed to the LPS proposed, with the reasoning set out in **Appendix 18**. Notwithstanding this feedback, NTP consider the LPS the most suitable method for servicing the development.

231. Based on the above, any effects on the wastewater network and on the wider network are considered minor and acceptable.

Stormwater

232. As set out within the Infrastructure Report (**Appendix 12**), the stormwater management strategy for the development will utilise both public and private stormwater discharge to treat, convey and dispose of stormwater.

233. Individual lots are proposed to soak all stormwater from roof areas directly to ground, for events up to and including the 2% AEP event. Resource consent is sought from ECan for this discharge.

234. Stormwater from public roads, reserves and individual lot hardstand areas is proposed to be managed under the CCC Global Discharge Consent. Individual lots are expected to provide their own pre-treatment for hardstand areas prior to discharging to the public network, and a requirement for this will be enforced by consent notices on each Title.

235. Noting the site is within the Christchurch Groundwater Protection Zone, stormwater treatment is crucial to dispose by soakage to the ground and the first flush will be treated via infiltration basins. The infiltration basins will be designed so that its base treatment media is exposed to natural gravels for efficient soakage. The media will provide an infiltration rate between 75mm/hr and 300mm/hr.

236. In terms of conveyance, primary and secondary networks will convey and dispose of the stormwater from roads, reserves and individual lot hardstand. Stormwater from roads and reserves will flow into sumps and then enter a piped network that follows the internal road alignment, this network will be sized to convey flows up to and including the critical 20% AEP event.

237. Secondary flow paths will be used for flows exceeding the pipe networks capacity and designed to prevent inundation on private lots during the 2% AEP. Flood modelling (1/50yr and 1/200yr events) will occur as part of detailed design, ensuring compliance with minimum finished floor levels and private property flooding requirements.

238. The main stormwater basins, Lots 200 and 201, have been strategically located on the site near the low points of the respective catchments to enable effective flow. The basins have been designed to allow storage of a 10% AEP 18-hour duration event, and any stormwater exceeding these requirements, up to and including the 2% AEP, will overtop to a series of rapid soakage chambers constructed into the natural gravels below the infiltration basin.

239. Consultation on the proposed stormwater management strategy has been undertaken with both CCC and ECan, with the intended strategy generally aligning with Council expectations.

240. CCC have provided a set of standard Council subdivision consent conditions as well as proposed consent notices to address the stormwater. The conditions are adopted as part of the application,

with the exception of conditions 17[4] and 20[5]. In DLS's opinion, Condition 17 is considered unnecessary as there are examples of infiltration infrastructure adjacent the site, showing soakage to ground is viable with reasonable soakage rates. In terms of Condition 20, this is testing will be undertaken to ensure compliance with Council requirements prior to section 224(c) issuing, and then again prior to the developer's maintenance period ending. As such there is no need to enter into a bond with Council. Further detail on this is included within the Infrastructure Assessment.

241. Subject to the above, any adverse effects arising from the stormwater strategy are considered to be less than minor and acceptable.

Water Quality Effects (Ground and Surface Water)

Ground Water

242. The effects of the proposed stormwater discharges to ground (construction, operational for the stormwater basins, and global operational for the 74 lots being created) are very low risk given the depth of groundwater (15m bgl), and proposed point of discharge (5-5.5m bgl), as well as the proposed treatment and infiltration measures. The Community Drinking Water Protection Zone does not overlap the site, and it is not expected the stormwater discharge will affect those drinking water supplies.

243. Overall, the stormwater management plan is considered to appropriately manage any potential adverse effects on groundwater quality. The plan includes treatment, attenuation, and disposal to ground. Measures involve collecting runoff from roofed areas, treating the first flush flow and using infiltration basins and soak pits. The mitigation measures are detailed in the proposed consent conditions.

244. Any effects on groundwater quality associated with the discharge are considered to be less than minor subject to appropriate robust erosion and sediment control as proposed in the volunteered consent conditions.

Surface Water

245. The construction of the culvert within the PWRN channel (artificial watercourse) is a permitted activity under the LWRP. However, during construction of the culvert, it is proposed that water will be dammed and diverted via a stabilised channel and discharged back into the same drain south of the culvert works. The proposed construction methodology is attached at the rear of **Appendix 12** and as shown on the Earthworks Plans attached to the Infrastructure Report.

246. The works associated with this take have the potential to adversely affect the quality of surface water and associated ecosystems. This could occur by way of the mobilisation of sediment in the waterway and disturbances / alterations to existing habitat and passage for fish.

247. Notwithstanding, to ensure that water quality in the drain is maintained the implementation of a ESCP will be necessary and consent conditions are proposed as part of the package in **Appendix 14.** All riparian earthworks and vegetation clearance (grass, gorse hedge and exotic

[4] Requiring infiltration testing to be undertaken at time of infrastructure construction to confirm it is sufficient.
[5] Which would require a bond to be entered into with Council.

trees) are to be undertaken in accordance with an ESCP. Through adherence to the ESCP, any adverse effects on the artificial watercourse will be less than minor.

248. In addition to the ECSP, fish salvage during the installation works has been recommended by the project ecologist in order to maintain the ecological values of the waterway. This is covered in further detail in the ecology section below.

249. In summary, any effects on the water quality of the drain will be less than minor, accounting for erosion and sediment controls as proposed in the conditions attached as **Appendix 14**.

(c) Any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:

Ecology and Biodiversity Effects (Herpetology, Freshwater and Avifauna)

Herpetology

250. Wildlands have assessed the site for native lizard habitat and potential effects on lizards. Targeted lizard surveys have been undertaken on site between 24 April and 8 May 2025. The surveys detected Southern Grass Skink in multiple locations across the site. The proposal will result in an impact and loss of this existing lizard habitat.

251. Recognising the disturbance of lizard habitat and species, a Wildlife Act Approval (WAA) permit to capture and translocate lizards is sought as part of the Fast-track application. The requirements in relation Schedule 7 of the FTAA2024 relating to Wildlife Act 1953 are addressed by Ms King in **Appendix 8.** This is also supported by **Appendix 25** which addresses the information requirements for wildlife approvals under Schedule 7 (clause 2) of the Act.

252. The LMP sets out the methodology for the salvage and relocation programme, summarised briefly below:

- Lizards will be trapped using live-capture traps, and all lizard management and handling being undertaken by DOC approved herpetologists.
- Salvage will be undertaken in stages, with increased trapping in the areas of confirmed habitat, earthworks will proceed a maximum of two weeks after salvage completion for each stage.
- Captured lizards will be placed in temporary holding containers and released within two hours of capture.
- The primary release site is located at Templeton Golf Course to the immediate north of the site, with the release site having an area of 2.2ha.
- A targeted survey of the release site will be completed prior to the lizard release. If the site is deemed unsuitable due to very high lizard density, alternative sites will be identified as set out in the LMP.
- The release site will undergo significant enhancement to improve its carrying capacity, and an enhancement landscaping plan is attached as part of the LMP.

- Ongoing monitoring of the release site will occur to assess lizard population persistence, plant survival and effectiveness of pest control.

253. Accounting for the above, the effects of the proposal on native lizards are considered to be appropriately managed such that any adverse effects will be minor and acceptable.

Freshwater ecology

254. Instream Consulting Ltd have assessed the freshwater habitat and ecology at the site, a copy of her report is attached as **Appendix 9**.

255. Instream has found that there are no natural surface water features on, or likely within 100m of the site. Instream notes that the water race (lateral channel of the PWRN) that flows along Barters Road is an artificial feature (not meeting the definition of a river in the LWRP) but may contain some limited aquatic values due to the potential presence of native fish populations. The water race also flows partially into the site before turning 'obsolete'.

256. To determine aquatic values of the water race, field surveys and fish surveys were undertaken. The results determined a very low habitat value, with fish presence limited to two upland bullies.

257. The proposed development will result in the loss of the internal artificial waterway. To mitigate for this loss, and to improve the aquatic ecology of the Barters Road drain, a 5m landscape strip is proposed along Barters Road between the waterway and future development. Indigenous planting is proposed within this strip, in line with the City Council's streamside planting guide.

258. With regard to the installation of the two culverts within the Barters Road drain, Instream comments that *designs should be as per the New Zealand Fish Passage Guidelines (2024), and designs should be reviewed by a suitably experienced freshwater ecologist to ensure consistency with the guidelines. Mitigation will be required for the works within the bed to install the culverts, including for the reach to be isolated and for a fish salvage to be undertaken with the required permits in place. A fish salvage is also recommended to be undertaken prior to infilling of the waterway internal to the site.*

259. It is considered that the above requirements can be imposed via a condition of consent. Accounting for the proposed conditions, the effects of the proposal on freshwater ecology are considered minor and acceptable.

Terrestrial Ecology

260. An ecological assessment of the development area has been undertaken by Wildlands, attached as **Appendix 7.**

261. The assessment included a desktop study and site walkover to determine potential effects relating to vegetation and flora, avifauna and invertebrates[6]. In summary the key findings of the ecological values of the site are summarised below:

[6] The assessment also included lizards, albeit that is discussed separately in the above section of this report.

- Vegetation on the site is highly modified, the land has been cleared of any remnant indigenous vegetation and planted/over sown with exotic pasture grasses, crops and trees.

- The one naturally occurring indigenous plant species (fireweed) is common throughout Canterbury and New Zealand; it is considered to be of low ecological value.

- Exotic vegetation in the study area provides habitat for indigenous fauna (including bird and lizard species), however these habitats are unlikely to be high, given these are all highly modified and dominated by exotic species.

- Wildlands consider the site to be classified as 'significant' under the ecological significance criteria in both the Canterbury Regional Policy Statement ('RPS') and the National Policy Statement for Indigenous Biodiversity (NPS-IB). This is due to the potential location of three species on site, being the southern grass skink, the New Zealand praying mantis and the tōrea/South Island pied oyster catcher. Notably however, whilst the southern grass skink was discovered during site survey, the latter two species were not found on site.

262. In terms of adverse effects, Wildlands consider that the potential development effects on vegetation and flora will be largely negligible given the characteristics of the existing site which is predominantly dominated by pasture.

263. With regard avifauna, it is acknowledged that there will be a minor effect with regard to habitat modification and/or loss as the development may affect various indigenous species including tōrea / South Island pied oyster catcher. However, Wildlands note that there is more suitable habitat within the surrounding area which these species can naturally relocate to. Conditions of consent are recommended to ensure the development works occur outside of the breeding season, and in the event that works are to occur within the breeding season, a bird management plan is to be implemented.

264. The potential impact on invertebrates is considered minor, recognising that existing habitat will be lost during the redevelopment of the site. Wildlands note that there is only a small amount of habitat that may support any notable invertebrates, and that avoidance of these areas is not always possible with a subdivision as proposed. In any event, landscaping proposed as part of the redevelopment will result in the creation of potential new habitat for invertebrates.

265. The following recommendations will form consent conditions to appropriately manage the effects on terrestrial ecology:

- Preparation of a Dust Management Plan to manage dust during site works[7].

- A pre-construction survey to identify any breeding birds on site, and preparation of an avifauna management plan to include how the works will be managed.

- Site investigation of 111 Pound Road to determine wetland habitat and whether delineation is required[8]. If the wetland is confirmed as absent, no mitigation will be

[7] This is already a requirement under the CARP

[8] Due to the private ownership of this part of the site, and the fact that it was the 'roar' (this site is grazed by deer) site access was not possible to confirm the potential wetland habitat.

required. If present, advice will be required from a qualified ecologist to manage the effects of this habitat.

266. Overall, the proposed development site is predominantly actively grazed and cultivated farmland, containing highly modified vegetation dominated by exotic pasture, crops and trees. Potential adverse effects on terrestrial ecology can be managed via the above conditions of consent, such that there will be no adverse effects that reach the threshold of 'sufficiently significant' such that they need to be taken into account in terms of an assessment under s85 of the FTAA2024.

Biodiversity Conclusions

267. Based on the advice of the ecologists at Wildlands and Instream Consulting, the effects of the proposal on lizard, freshwater and terrestrial ecology are considered minor and acceptable.

(d) Any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:

Cultural Effects

268. The site is not within any identified overlays for sites of Ngāi Tahu cultural significance (Wāhi Tapu/Wāhi Taonga; Mahaanui Iwi Management Plan Silent Files and Kaitōrete Spit and Ngā Taranga Tūpuna. The PWRN (Barters Road drain) is also not covered by the Ngā Wai overlay in the District Plan. However, this does not mean it is of no cultural value to Ngāi Tahu. As is the case with any potential works in proximity to a waterway or change of land use, there may be impacts on the likes of indigenous fauna and flora, mahinga kai values and on the mauri of water.

269. An assessment against the relevant Canterbury Iwi Management Plans including Mahaanui Iwi Management Plan 2013 and Te Rūnanga o Ngāi Tahu – Freshwater Policy is included in **Appendix 23**.

270. The Mahaanui Iwi Management Plan (IMP) objectives for papatuanuku (land), and wai māori (water) are primarily concerned with 'inappropriate land use' and 'managing effects' in the context of Ngāi Tahu cultural heritage. Regarding cultural values, it is noted that the applicant proposes to remediate areas of contamination, carefully manage stormwater sediment run-off during construction works and once established ensure that contaminants from hard stand areas are treated prior to discharge. This accords with the principals in the IMP and will ensure the cultural values of the waterway and groundwater are maintained.

271. The application also includes planting a 5m landscape strip along the Barters Road Frontage (length of approximately 1km) and two SMA's that will be planted with natives (from the CDP non-bird attracting list), and planting along all internal road corridors. Additionally, a 3m building setback and planting of one tree per 10m of boundary is proposed along the interface of the Open Space Community Parks Zone (Templeton Golf Course). Tree species will be indigenous and locally sourced, providing for a potential linkage with Significant Ecological Site of the Templeton Golf Course. There is very limited existing indigenous vegetation present on site that is being removed to enable the development. Regarding indigenous fauna, the project's ecologists have identified that there is no evidence of native bird species nesting at the site, however native lizards have been identified through lizard surveys. A Lizard Management Plan has been prepared which outlines how the lizards will be managed during the construction and development phase of the site, refer **Appendix 8**.

272. An assessment of the proposal against the Ngāi Tahu subdivision and development guidelines is contained in **Appendix 21**. Effects on ecological and waterways values are assessed in further detail under separate headings above.

273. The following rūnanga hold mana whenua over the project's location, as it is within their takiwā:

Te Ngāi Tūāhuriri Rūnanga. A copy of the preliminary feedback from consultation with Te Ngāi Tūāhuriri is attached as ***Appendix 22. Placeholder for feedback here.***

274. Feedback was received by Whitiora Centre who have been mandated by Ngāi Tūāhuriri Rūnanga to act on its behalf in matters of environmental policy and planning. Whitiora were largely in support of the proposal, on the basis that appropriate conditions and monitoring will be in place to manage potential environmental effects (earthworks, stormwater, indigenous flora and fauna). A concern was raised in regard the integration of the development with the surrounding environment, and subsequently NTP have taken this feedback on board through the proposed building setback and planting of trees along the northern boundary. Whitiora confirmed that they are in support of the proposed setback and planting, refer to **Appendix 22** for further detail.

(e) Any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:

Earthworks, Stormwater Discharge and Contamination Effects

Earthworks

275. Earthworks are required to construct the proposed subdivision including associated infrastructure (roads, stormwater management areas and culvert installation works). The proposed earthworks are detailed in the Davie Lovell-Smith report in **Appendix 12** (with cut fill plans appended) and Earthworks Management Plan (EMP) in **Appendix 13**. The EMP provided with the application is by necessity a draft, the details of which will be finalised in consultation with the project engineer when a contractor is appointed.

276. The proposed earthworks do not comply with the regional or district plan requirements due to the volumes involved, the large areas of land to be disturbed and the proximity of the earthworks to the waterway. The development and associated earthworks are proposed to be undertaken as each stage progresses. The earthworks for site development will generally be confined to the roading corridors and construction of infrastructure to limit the area of exposed earthworks at any one time.

277. The maximum anticipated earthwork cut depths are 175,000m^3. The maximum depth of excavation will be 5m – 5.5m (excavation to subgrade being 3.5m and stormwater soakpits a further 2m below this). Groundwater, indicated to be approximately 15-18 metres bgl, is not expected to be encountered during these activities. As a precautionary measure in the unlikely event that ground water is intercepted an Artesian Aquifer Interception condition is proposed.

278. With regards to installation of the culvert within the PWRN, a culvert construction methodology is attached at the rear of **Appendix 12** setting out how these works will be undertaken to manage adverse effects upon the waterway.

279. Management of the earthworks is crucial to minimise adverse environmental effects including dust, sediment runoff and stormwater flow paths and ponding in this context. The specific effect

of the earthworks and sediment mobilisation for diverting the drain are discussed under the effects on freshwater above.

280. Key mitigation measures that form part of the application include:

- Implementing sediment and erosion controls according to ECan guidelines and best practices**.**
- Staging of bulk earthworks, with a maximum area of 5ha of the site being open at any one time
- Progressive stabilisation of completed areas and monitoring of controls**.**

281. Implementing an EMP (see **Appendix 13**) involves:

- Dust control measures such as watering haul tracks and exposed areas, stabilising stockpiles, and limiting dust-generating activities during strong winds. This is particularly important given the proximity of the airport and the heightened risk of dust for this land use.
- Noise and vibration monitoring and adherence to relevant New Zealand and German standards.
- Preparing and implementing a Construction Traffic Management Plan.
- Sediment and erosion controls will be installed prior to the commencement of any earthworks and maintained for the duration of the works. These controls include stabilised site entrances, diversion bunds/channels, super silt fences, and sediment retention areas.
- Overland flow paths for the development will follow the road layout after earthworks to direct stormwater away from lots and future buildings.

282. The general construction sequence will involve a pre-construction meeting, site establishment, installation of erosion and sediment controls, vegetation and building removal, contamination remediation (if required), topsoil stripping, excavation and cut/fill balance, stockpiling and stabilisation of excess cut, re-topsoiling and progressive stabilisation, installation of services, road construction, removal of erosion and sediment control devices, and final landscaping.

283. The application includes earthworks conditions based on CCC and ECan standard conditions, which are proposed in **Appendix 14**. Accounting for these conditions, earthworks will be appropriately managed so that effects are less than minor and acceptable.

Stormwater – Construction phase

284. The Infrastructure Report (**Appendix 12**) and Earthworks Management Plan (**Appendix 13**) details how stormwater is to be managed during the construction phase of the development.

285. Firstly, with respect to management of contamination, as set out earlier, further investigations will be undertaken on site with a finalised DSI submitted to Council and ECan for acceptance, alongside a finalised RAP to demonstrate how the site will be remediated. This will occur ahead of bulk earthworks and stormwater discharge occurring. Momentum Environmental have confirmed that the areas of remediation are generally small discrete areas that could be

completed in a day or two of fine weather, thus not generating any stormwater discharge during remediation.

286. DLS note that disposing construction phase stormwater to ground is a more practical method than using a sediment retention pond (SRP). In particular, issues with a SRP include that there is no reticulated stormwater network to discharge to, there is no stormwater disposal facility sized to cater for runoff from the development site, an SRP often requires the use of flocculants to assist removal of suspended particles, which creates additional environmental risk, the base of a SRP would likely be excavated close or into the natural gravels, resulting in a 'soakpit' being created any way, and retention of dirty construction phase water on site in an SRP is an environmental risk that can otherwise be avoided through the proposal. To this extent, it is considered the environmental outcomes of soakage to ground outweigh the potential use of an SRP.

287. Overall subject to the detailed measures set out within **Appendix 12** and **13**, alongside conditions of consent, potential adverse effects will be appropriately managed such that effects on the environment will be acceptable.

Contamination

288. The NES for Managing Contaminants in Soil is a relevant statutory document that must be considered when subdividing or changing the use of a piece of land. A DSI undertaken by Momentum Environmental as attached as **Appendix 6**. The report includes a review of the site history, field observations and soil sample analysis.

289. The site has historically been used for rural and rural residential land use, including various farming practices including horticulture and poultry farming, waste disposal through burning and burying, and storage of fuels and pesticides which has led to the identification of multiple potential and confirmed HAIL activities.

290. Momentum Environmental undertook a site walkover and identified potential HAIL activities including persistent pesticide bulk storage and use (HAIL A10), pest control (HAIL A11), and 'any other contaminants' (HAIL I) including lead paint, asbestos and coal ash.

291. Soil sampling was undertaken across the site, with targeted sampling around key risk areas (identified in section 8 and 9 of the Momentum report), with samples taken for heavy metals, organochlorine pesticides and asbestos.

292. Results from the sampling identified several small hotspots of contamination that exceed 'commercial/industrial' levels, these were associated with burning waste materials on the site.

293. Based on the above, the NES Soil applies due to the presence of contaminants above background concentrations and the development will exceed the permitted activity criteria for soil disturbance volumes and duration, as such resource consent is required as a restricted discretionary activity under the NES Soil.

294. Momentum recommend that all areas identified as having contaminants exceeding the 'commercial/industrial' levels are remediated. An initial Remediation Action Plan (RAP) has been prepared to support the recommendation and is attached as **Appendix 6**. However, as set out, there is further testing required to parts of the site where access has not been possible. Prior to commencement of bulk earthworks on site, further testing is proposed to be undertaken and a

final DSI will be provided to both CCC and ECan, alongside a final RAP. Conditions of consent are volunteered in this regard. Following remediation of the site, further sampling will be required to validate the site post building and/or infrastructure removal, and Site Validation Report (SVR) will be produced and sent to the respective Councils.

295. In conclusion, contaminated soils can be appropriately managed by standard practices and any risk to human health or in regard to runoff to waterways and stormwater discharge are less than minor and acceptable.

(f) Any unreasonable emission of noise:

Noise Effects

296. The noise effects of the proposal have been assessed by Powell Fenwick. Their acoustic assessment is attached as **Appendix 4** and considers a number of potential noise effects including:

- Noise from future industrial activities, including effects on nearby rural dwellings;
- Noise from Increased traffic generation;
- Noise from construction;

297. Prior to considering the above effects, it is important to understand the existing noise context of the site as it is uncharacteristically noisy for a rural property (as demonstrated in Powell Fenwick's survey work). In summary, the existing noise environment at the proposed development site is characterised by significant noise contributions from aircraft operations and road traffic on surrounding major roads including, Ruapuna Speedway (intermittently) and aircraft overheard. The quarries further north and north-west of the site were not found to add significantly to noise characteristics. This results in ambient noise levels that are elevated compared to typical rural settings and that are already above District Plan permitted levels of noise for rural zones, particularly at night-time (by approximately 10dB).

298. A majority of general industrial activities can be designed to comply with rural noise limits and there is no fundamental incompatibility between General Industrial Zone activities (as defined in the application) and the surrounding rural environment. An IG / RUF interface occurs in a number of locations across the city's urban edge and the District Plan noise provisions account for this scenario.

299. Compliant activities are expected to have minimal additional noise effects in this environment. In the less likely event of non-compliant noise levels, practicable mitigation and management measures are expected to be available.

300. Noise generation from future operational activities within the industrial development affecting people living in rural dwellings is the primary noise effect. In particular, the rural dwellings in the adjacent RUF Zone at 7 Hasketts Road, 1 and 18 Maddisons Road, 33, 41, 45, 55, 61, 75 and 79 Barters Road have been considered by Powell Fenwick. Powell Fenwick makes the following salient points as to why these parties are not affected in a more than minor way:

- 7 Hasketts Road contains a derelict residential building and is understood to have been purchased by Christchurch City Council due to noise complaints from Ruapuna.

- 1 Maddisons Road and 75 Barters Road appear to be used for truck parking, and thus not purely residential.

- Despite adjacencies to rural residential dwellings, Powell Fenwick considers it unlikely that industrial general activities directly adjacent to Barters Rd (Lots 44 to 55 and Lot 1) will exceed District Plan Rural noise limits.

- The lots fronting Barters Road are arranged with internal access, as such it is likely that yard area will be to the north of these sites, and away from the rural-residential interface on Barters Road.

301. Regarding night-time operations in respect of activities with yards, truck manoeuvring areas at road frontages, or factory building openings close to and facing road frontages, Powell Fenwick consider there is a greater risk for those Lots adjacent Barters Road to exceed acceptable noise levels if operating at night (due to closer proximity to neighbouring residents). However, Powell Fenwick acknowledge that such operators would consider noise effects of their activities prior to commencing operations and are expected to be able to put in place reasonable managerial measures if operating at night. To this effect, no noise specific condition is required to restrict operations above and beyond the standard IG zone noise limitations to these sites.

302. Regarding noise from traffic on nearby public roads generated by the proposed development, Powell Fenwick does not anticipate this to affect people living in nearby rural dwellings. Powell Fenwick concludes that the expected 0-2 dB increases in road traffic noise associated with the proposed industrial development will generate minimal additional noise effects.

303. It is important that construction is managed to mitigate noise effects on rural dwellings. This is particularly the case given the scale of the proposal which requires the use of heavy equipment, producing both noise and vibration. An appropriate means of identifying construction noise levels and planning for mitigation and management measures is an appropriately qualified and experienced acoustic engineer developing a Construction Noise and Vibration Management Plan, in conjunction with the construction contractor(s), or reviewed by the contractor(s) prior to implementation. This is recommended as a condition of consent.

304. Powell Fenwick considers that the operation of industrial activities at the site will result in minimal additional noise effects on rural dwellings, and that the noise environment is suitable for industrial activities to operate safely.

305. Based on the above, the following conclusions and necessary mitigation measures are made:

- 14 Hasketts Road is to be surrounded by the development on all boundaries, noting that the site has resource consent for the development and operation of a Temple. Notwithstanding, it is recognised the site is already subject to the existing noise from adjacent roads, Ruapuna Park and the CIA flight path. In order to minimise noise effects from the development, Powell Fenwick recommends that acoustic fencing is installed around the boundaries of this site, and recommends a daytime and nighttime

limit of 55 dB LAeq and 75 dB LAmax be sought for noise from industrial sites to 14 Hasketts Rd. A condition of consent is included to that extent.

- For lots adjoining Templeton Golf Course, Powell Fenwick does not consider that the nighttime noise requirements need to apply and instead recommends a condition that limits noise from these lots to be measured in accordance with daytime requirements, with no maximum. This is due to the fact that the Golf Course will not be occupied during nighttime hours and thus is not sensitive to noise at this time.

- Proposed Lot 43 is a larger lot and could have the potential to be used for container storage or similar, and if this was the case Powell Fenwick considers it could have the potential to result in greater noise exceedances by nature of its general operations. Powell Fenwick recommend a condition of consent requiring a noise assessment to be undertaken should this lot be used for this type of industrial activity. Notwithstanding this recommendation of the specialist, it is recognised that if a future occupier of this site were to operate container storage or similar activity, they would be required to comply with the noise standards of the IG zone (or otherwise obtain a resource consent). To this effect, the condition requiring provision of a noise assessment is not necessary and consequently is not adopted or volunteered as part of the application.

306. Accounting for the conditions and the advice of Powell Fenwick, the acoustic effects of the proposal are considered minor and acceptable.

(g) Any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.

Geotechnical and Flood Hazard Risks

Geotechnical Hazards

307. In terms of how the development may be affected by natural hazards, a geotechnical assessment of the site was undertaken by KGA Geotechnical to determine the suitability of the site for development. This assessment is attached as **Appendix 5**.

308. The key conclusions of the geotechnical assessment are:

- The site is classified as ‘Class D – Deep or soft soil sites’ according to NZS1170.5.

- The site has a low risk of geotechnical hazards including:

- Erosion: due to the flat topography and proposed stormwater system.

- Falling debris: there are no slopes or exposed hills or rock faces.

- Liquefaction-induced settlement: the site is in an area of very low long term settlement hazard and liquefaction hazards

- Inundation: the site is not within any Flood Management Areas, and provided stormwater is managed appropriately the risk of inundation will not be exacerbated by the site development.

- The site has relatively uniform layers of topsoil, sand and sandy gravel.

- As part of the proposed earthworks, it is recommended topsoil to be stripped and fill material checked for suitability or otherwise be replaced with engineered fill if required.

309. As set out within the assessment, there are parts of the site that were not able to be accessed for testing, and a condition and consent notice to this effect are proposed within the conditions package to undertake further geotechnical testing, and for the need for lot-specific geotechnical reports to address specific design criteria for new structures at the time of building consent.

310. The assessment concluded that the site is geotechnically suitable for a subdivision and future industrial construction providing a lot-specific geotechnical report is completed for each new structure. KGA's advice is accepted, and any geotechnical hazards are considered less than minor and acceptable.

Flood Hazards

311. In terms of how the development may be affected from climate change the site is not within any existing mapped flood zones or overlays in either the LWRP or CDP. However, as a non-complying activity flood hazards have been considered. The following summary is made in regard flood hazards (refer Infrastructure Report, **Appendix 12**):

- The site is not within either the High Hazard Flood Management Area or the Flood Management Area as identified in the Christchurch District Plan. Any historic flooding on the site is anticipated to have been restricted to natural low areas that would have corresponded to old river and water course channels.

- There are no known watercourses or water sources within the site that are anticipated to cause flooding. The low-lying areas of the site will be filled during bulk earthworks, and overland flow paths will be formed during the development to ensure secondary flow is transported to the stormwater detention and infiltration facilities.

312. Overall, the development is not expected to be affected by climate change and flood risk, nor is it considered that the development will exacerbate the flood risk to any adjoining land.

Conclusion – Actual or Potential Effects

Conclusion – Actual and Potential Effects on the Environment

313. In summary of the assessment above, the proposal will generate no more than **minor** actual or potential adverse effects on the environment and those effects are assessed as being acceptable.

314. Given the above, there are no effects that reach the threshold of a “sufficiently significant adverse impact” such that they need to be considered in terms of an assessment under s 85 of the FTAA2024.

Relevant Provisions of Planning Instruments

Introduction

315. An assessment of the activity against the relevant provisions of the applicable statutory and non-statutory planning instruments (under the RMA) (see clauses 5((1)(h) and 5(2) of Schedule 5 of the FTAA) is included in **Appendix 23** with the findings summarised below.

316. It is important to note that given the application is tantamount to a de facto plan change, the assessment in **Appendix 23** and the summary which follows below also considers policy that legally only applies to plan changes but is still relevant to consider as to whether the application meets national policy aims and objectives. For example, Policy 8 of the NPS-UD relates to plan changes that would add significantly to development capacity. To ignore this policy because the proposal is not a plan change would be artificial. To do so would disregard the intent of the NPS-UD to enable sufficient development capacity through the urbanisation of land, through rezoning under conventional RMA processes, or through fast-track consenting under the Act, as is proposed here. For similar reasons, strict 'avoidance' policies in RMA planning documents concerning the urban development and use of rural zoned land (for example in the NPS-HPL, CRPS and District Plan) need to be considered in the context of the FTAA2024 which provides for the urbanisation of rural land by way of resource consent (and without the need for rezoning in the first instance).

317. It is notable that the key consideration for the decision maker is the purpose of the Act. The test for accepting or declining a substantive application, as set out in s 85(3), requires a weighing exercise of any sufficiently significant adverse impacts. However, it does not allow a panel to form the view that an adverse impact is sufficiently significant to be out of proportion to the project's regional or national benefits solely because the adverse impact is inconsistent with or contrary to a provision of a specified Act or any other document that the panel must take into account or consider. The following sections of this assessment evaluate all relevant planning documents/provisions, before reaching a conclusion regarding s 85.

National or Regional Statutory Planning Documents

National Policy Statement for Freshwater Management 2020

318. The NPS-FM provides direction for local authorities on managing freshwater under the RMA.

319. The relevant provisions are assessed in **Appendix 23**. In summary, the NPS-FM emphasises the concept of Te Mana o te Wai, which prioritizes the health and well-being of water bodies, followed by the essential needs of people, and then other uses and its objectives and policies aim to ensure sustainable and equitable management of freshwater resources, balancing ecological health with human needs.

320. Accounting for the findings in the technical assessments on water quality, the assessment of effects on water quality, the condition of consent requiring further assessment to confirm wetland habitat, and the assessment of equivalent provisions concerned with freshwater in other statutory planning documents, the proposal is assessed as being consistent with the sole objective of this policy statement and its associated policies.

National Policy Statement for Indigenous Biodiversity 2023

321. The NPS-IB aims to protect and restore the country's unique indigenous biodiversity and provides direction to local authorities on how to identify, maintain, and protect significant natural areas and manage the adverse effects of activities on them.

322. The relevant provisions are assessed in **Appendix 23**. Based on the assessment of potential ecology and biodiversity effects (Herpetology especially), and the assessment of equivalent provisions concerned with indigenous biodiversity in other statutory planning documents, the proposal is assessed as being consistent with the sole objective of this policy statement and its associated policies.

National Policy Statement for Highly Productive Land 2022

323. The NPS-HPL aims to protect highly productive land for use in land-based primary production, ensuring its availability for future generations. Its objectives and policies focus on recognising and protecting highly productive land, restricting urban rezoning except in specific circumstances, identifying and mapping such land, managing adverse effects, supporting productive use, and involving tangata whenua in decision-making processes. These policies aim to balance development needs with the importance of maintaining land for agricultural and horticultural purposes.

324. Legal advice attached as **Appendix 24** addresses whether the site, which is zoned RUF, is a General Rural or Rural Production zone for the purpose of the NPS-HPL. The legal advice is that the site is not zoned General Rural or Rural Production and therefore the NPS-HPL does not apply under the definition of highly productive land.

325. An assessment against the NPS-HPL has been provided in case the panel adopt a different interpretation and decide that the RUF does constitute a General Rural or Rural Production zone and the NPS-HPL is therefore relevant (see **Appendix 23** for a full assessment).

326. Whilst this proposal is for resource consent rather than ‘urban rezoning’, the implementation provisions in the NPS-HPL concerned with rezoning (and clause 3.6 especially) provide relevant guidance to this application (insofar that it proposes to urbanise rural land).

327. Those provisions generally discourage urban rezoning of highly productive land but allow for exceptions under certain conditions. These include existing urban development plans, council-initiated plan changes, and a lack of alternative options for urban development. These exceptions provide flexibility to accommodate necessary urban growth and development when justified.

328. In the case of this proposal, the economic and industrial land market assessments in **Appendix 16** and **Appendix 17** have established a need for more urban industrial land, with limited alternatives available. An assessment from Reeftide is also included in **Appendix 20**, which concludes that the proposed development is appropriate and will not compromise the use of the highly productive land for land-based primary production, both now and in the future.

329. In conclusion, the legal advice is that is NPS-HPL does not apply to the subject land, but in any event, the proposed urbanisation of highly productive land in this context is considered to be generally consistent with the NPS-HPL, notwithstanding its advancement by way of resource consent rather than rezoning.

National Policy Statement on Urban Development 2020

330. The NPS-UD, updated in May 2022, aims to ensure that New Zealand's towns and cities are well-functioning urban environments. It sets out objectives and policies to support urban growth and development, addressing the needs of diverse communities, including different business sectors.

331. The NPS-UD focuses on creating well-functioning urban environments that enable social, economic, and cultural well-being, improving housing affordability, removing barriers to development, providing sufficient development capacity for housing and business land, and ensuring responsive planning to changes in demand.

332. The relevant provisions of the NPS-UD are assessed in **Appendix 23**. The specific objectives and policies of relevance to this application seek sufficient development capacity suitable for different business sectors and a well-functioning urban environment. They also recognise that urban environments develop and change over time and require responsiveness to proposals that supply significant development capacity.

333. The proposed development is unanticipated by lower-order planning documents being the CDP and CRPS, as discussed in the assessment contained in **Appendix 23**. However, the proposal will add significantly to development capacity and contribute to a well-functioning urban environment. Regarding development capacity, the contribution will be significant, given that the proposal will provide an additional 42ha of freehold industrial land in the Islington Hornby South locality. This is significant in the context of unencumbered freehold industrial land supply and demand in Christchurch, particularly for the businesses seeking to establish in this high-demand area which is facing a projected shortfall. This assessment is supported by the Economics Assessment of Savvy Consulting (**Appendix 16**).

334. Overall, the proposal is assessed as being consistent with the NPS-UD.

Canterbury Regional Policy Statement

335. The CRPS sets out the policies and objectives to achieve integrated management of natural and physical resources for the Canterbury Region.

336. Relevant objectives and policies to this proposal are found in the following chapters:

- Chapter 5 - Land-use and Infrastructure;
- Chapter 6 - Recovery and Rebuilding of Greater Christchurch;
- Chapter 7 - Freshwater;
- Chapter 11 - Natural Hazards;
- Chapter 12 - Landscape;
- Chapter 15 - Soils;
- Chapter 16 - Energy;
- Chapter 17 - Contaminated Land; and,

- Chapter 19 - Waste Minimisation and Management.

337. These provisions are assessed in **Appendix 23**, and based on that evaluation the proposal is found to have some tension with provisions in Chapter 6 that require new business zones to be located within identified greenfield priority areas (which do not encompass the site). However, as detailed in the assessment of the Chapter 6 provisions, the proposal will not necessarily offend those provisions.

338. The remaining provisions in the CRPS are generally concerned with issues and effects of regional significance, and in that respect, such matters will not arise or will be appropriately managed by way of proposed conditions and/or the attributes of the proposal.

339. Overall, the proposal is therefore assessed as being generally consistent with the CRPS.

Canterbury Land and Water Regional Plan

340. The objectives of the LWRP collectively seek to manage land and water as integrated natural resources (e.g. Objective 3.1), manage the quality and quantity of freshwater to safeguard the life-supporting capacity of ecosystems and ecosystem processes (e.g. Objective 3.8), maintain freshwater bodies and their catchments in a healthy state (e.g. Objective 3.16), protect the natural character of waterbodies (e.g. Objective 3.19), and maintain healthy and productive soils (e.g. Objective 3.23).

341. The key provisions of relevance in the LWRP have been assessed in **Appendix 23**. That assessment notes that the relevant rules and resource consent requirements under the LWRP have been identified and assessed in the AEE with supporting technical assessments that consider potential effects on land and water resources. Based on the assessment of those effects (which concludes that they will be avoided or managed to acceptable levels) the proposal is found to be consistent with the provisions in the LWRP.

Canterbury Air Regional Plan

342. As described in **Appendix 23**, the objectives and policies of the Air Plan broadly seek, in relation to industrial and trade activities and large scale fuel burning devices, the best practicable options to minimise the effects of discharges, manage and in some situations avoid discharges of PM10, manage discharges of odour and dust from solid or liquid waste, and address localised effects of discharges including relative to sensitive receptors.

343. Such discharges are not proposed in this application and any future discharges associated with individual developments will either fall to be permitted under the rules of the Air Plan, or will be assessed in an integrated manner through the resource consent process, with ECan as the consenting authority. When detailed development plans are advanced, various options for the design and management of discharges will be available (if required) to ensure any adverse effects are minimised.

The Christchurch District Plan

344. The proposal is assessed as being contrary to those provisions in the District Plan that are specific to the district's rural zones, including those in Chapter 17 (Rural) especially. Per the assessment of the Chapter 17 provisions in **Appendix 23** that conflict is to be expected, given

that the proposal entails urban development of the nature envisaged by the IG Zone on land that is presently zoned for rural purposes.

345. That conflict aside, the proposal is assessed as being:

- Consistent with the strategic objectives in Chapter 3 which include a primary objective (3.3.1) to:
  - Meet the community's needs for economic development (industrial land), without diminishing wellbeing; and
  - Foster investment certainty (for the applicant and those businesses seeking industrial land in this locality and market).
- Consistent with those objectives and policies throughout the District Plan that are concerned with the avoidance or management of effects on the environment; and
- Consistent with the objectives and policies in Chapter 16 (Industrial), including:
  - Objective 16.2.1 which seeks *'The recovery and economic growth of the district's industry is supported and strengthened in …new greenfield industrial zones'.*
  - Policy 16.2.1.1 which seeks to *'Maintain a sufficient supply of industrial zoned land to meet short, medium and long term supply needs of industrial activities, having regard to the requirements of different industries…'.*
  - Policies 16.2.1.3 and 16.2.1.4 insofar that these specify what is envisaged for the Industrial General zone.

346. Overall, if the rural zoning and provisions are set aside (given this proposal seeks to urbanise the land) and the District Plan is considered in light of its strategic objectives, its comprehensive suite of effects-based objectives and provisions, and its objectives for Industrial activity and areas, the application is assessed as being generally (and strongly) consistent with the District Plan in an overall sense.

Proposed Plan or Changes

347. There are no proposed changes to the District Plan of relevance to this proposal.

Non-Statutory & Other Planning Documents

Mahaanui Iwi Management Plan

348. The IMP is the relevant iwi planning document that applies to this proposal.

349. The purpose of the IMP is to:

- Express kaitiakitanga by effectively and proactively applying Ngāi Tahu values and policies to natural resource and environmental management; and

- Protect taonga and the relationship of tāngata whenua to these by ensuring that the management of land and water resources achieves meaningful cultural and environmental outcomes.

350. An assessment of the relevant provisions in the IMP is set out in **Appendix 23**. That assessment includes an evaluation the proposal in terms of the Ngāi Tahu subdivision and development guidelines which guides the implementation of the IMP; and consideration of Te Rūnanga o Ngāi Tahu - Freshwater Policy which provides specific direction on freshwater matters.

351. Based on that evaluation, the proposal is generally consistent with the IMP.

Canterbury Regional Land Transport Strategy

352. As described in the assessment included at **Appendix 23**, the Canterbury Regional Land Transport Strategy establishes the strategic direction for land transport within the Canterbury Region over a 30-year period. The strategy identifies the region's transport needs, the roles of land transport modes along with the planning, engineering, education, encouragement and enforcement methods that will be applied in the achievement of objectives.

353. The proposed development accords with this strategy, insofar that the safety and efficiency of the transport network in the vicinity of the site will not be compromised by the proposal, the development site provides for accessibility by a variety of modes (including potential public transport services) and the site has good connectivity to the local and strategic transport network.

Conclusion - Relevant Provisions of Planning Instruments

354. Having assessed the activity against the applicable statutory and non-statutory planning instruments, if the current rural zoning and provisions are set aside (given this proposal seeks to urbanise the land), it is concluded that the proposal is generally consistent with the relevant provisions in an overall sense. As such, there are no conflicts with provisions that reach the threshold of a "sufficiently significant adverse impact" such that they need to be considered in terms of an assessment under s 85 of the FTAA2024.

Relevant Other Matters

Consultation

Consultation

355. The FTAA2024 outlines consultation requirements for substantive applications in section 29(1)(a) and states that authorised persons for listed projects must consult the persons and groups referred to in section 11 before lodging a substantive application. The consultation requirements outlined in section 29(1)(a) are specific to projects listed under Schedule 2, as referred projects undertake consultation with the groups referred to in section 11 as part of their referral application (i.e. a finalised substantive application is not required for consultation to occur).

356. Specifically, section 11 of the FTAA2024 requires consultation with relevant local authorities (ECan, CCC and SDC), iwi authorities / hapu and Treaty settlement entities (Te Rūnanga o Ngāi Tahu and Te Ngāi Tūāhuriri Rūnanga) and administering agencies (Department of Conservation and Ministry for the Environment) prior to lodgement. Consultation has also been undertaken

with NZTA Waka Kotahi and Kiwi Rail in good faith, recognising the proposed transport effects. A summary of the consultation undertaken to date is presented in **Table 2** below :

Table 2. Consultation Summary

Party Consulted	Method of consultation	Relevant Documents	Summary
Te Rūnanga o Ngāi Tahu	Email correspondence and meeting held with Dean Christie (NTP) and Lisa MacKenzie (Te Rūnanga o Ngāi Tahu)	Refer to **Appendix 22** for a copy of the feedback received, 17 July 2025.	Te Rūnanga o Ngāi Tahu providing confirmation that the application can be lodged, and that no additional consultation is required through Te Rūnanga.
Te Ngāi Tūāhuriri Rūnanga	Consultation via Whitiora, preliminary meeting was held on 1 May 2025, a draft copy of the AEE was supplied for review on 10 June 2025 and a final copy was supplied on 30 June 2025.	Refer to **Appendix 22** for a copy of the consultation and feedback received 4 July 2025.	Provided with a draft and final copy of the AEE and appendices for review and provision of feedback. Feedback has been acknowledged, with the application updated to reflect and resolve the concerns raised.
Canterbury Regional Council (Ecan)	Pre-application meeting with Consents Major Projects Team (David Sluter, Anna Stewart, Vaughan van Noorden and Mihail Davidovski and Kate Williman) on Thursday 22 May 2025 Email exchanges regarding ECan standard condition set and specific subdivision infrastructure conditions.	Pre-application meeting minutes attached in **Appendix 18**.	Where time has permitted draft reports (including the aquatic ecology assessment and Detailed Site Investigation) have been shared with CRC staff. A number of the standard conditions have been adopted.
Christchurch City Council	Pre-application meeting with CCC Planner (Rachel Wilson) and experts including three-waters infrastructure, transport, noise, waterways, ecology, urban design and civil engineering/ earthworks - Wednesday 21 May 2025. Email exchanges regarding CCC standard condition set and specific subdivision infrastructure conditions.	Pre-application meeting minutes attached in **Appendix 18**.	Advice received has been addressed by technical assessments. Where time has permitted draft reports have been shared with CCC staff. A number of the standard land-use and subdivision conditions have been adopted. Where there are disagreements over infrastructure conditions reasons have been provided for in the applicants alternatives.
Selwyn District Council	Consultation via email to confirm approval for the installation of the culvert in the Paparua Water Race,	Email from Luc Le Roux (Selwyn District Council Surface Water Environmental Engineer). Refer to **Appendix 18.**	SDC confirmed that the installation of the culvert is acceptable subject to any ECan requirements and fish salvage.

	recognising Selwyn District Council is the asset owner.		
Department of Conservation	Pre-lodgement consultation meeting was held on 13 June 2025.	See DOC Pre-lodgement Consultation response attached in **Appendix 18** received 9 July 2025.	Provided a copy of the ecological assessment and Lizard Management Plan for review. The advice received is acknowledged and NTP will continue to work with DOC through the process to resolve these outstanding queries.
New Zealand Transport Agency – Waka Kotahi	Consultation with NZTA (Bruce Hawkins – Planner, and James Long – Safety Engineer) via a Teams meeting on 19 June 2025. Main purpose was to discuss the impact of the proposal on the Pound Rd / SH1 intersection as well as proposed condition. A follow up email was sent to NZTA on 27 June 2025.	Refer to **Appendix 18** for a copy of the feedback provided from NZTA.	Provided with a copy of the QTP modelling report and a summary of the Integrated Transport Assessment. A meeting was then held to discuss the proposed condition and to seek feedback on this.
Ministry for the Environment (MfE)	Consultation via a copy of the draft application being sent to MfE as the relevant administering agency of the RMA.	Section 29 response letter provided on 10 July 2025, refer to Appendix 18.	Letter from MfE setting out the relevant statutory requirements and assessment required for the FTAA.
KiwiRail	High-level telephone call was held between Novo Group Transport Engineer and Fraser Scales (KiwiRail Project Manager, Project Delivery Team, Infrastructure) on 8 July 2025.	No relevant documents owing to the consultation occurring via phone call.	KiwiRail confirmed that they typically require a Level Crossing Safety Impact Assessment if new developments are expected to increase vehicle and/or pedestrian volumes at a level crossing. This assessment evaluates the potential increase in safety risk due to higher traffic volumes and informs any necessary upgrades to maintain a safe crossing environment. The existing Pound Road level crossing (constructed in 2017) is equipped with barrier arms, warning lights, and pedestrian chicanes. Novo Group considers these features represent a standard of safety appropriate for this location. Additionally, the safety of this crossing is expected to be reviewed (and potentially enhanced) as part of the upgrades to the SH1 / Pound Road and Pound Road / Waterloo Road intersections. Given these factors, Novo Group considers that there is no immediate need for a separate

safety review of the Pound Road level crossing at this time.

Section 30(3) Notices

357. Pursuant to s 30(2) of the Act, the applicant has notified CCC and ECan, who have jurisdiction over the area where the approvals would apply, of its intention to apply for approvals described in section 42(4)(a) (resource consent) under the Act. In response, ECan and CCC have confirmed via written notice, in accordance with s 30(3)(b) that there are no existing resource consents of the kind referred to in s 30(3)(a). The ECan notice is attached as **Appendix 26** and the CCC notice is attached as **Appendix 27** and in accordance with s 30(6)(b) this substantive application has been lodged within 3 months of receiving the earlier notice.

Owners and Occupiers of Adjacent Sites

358. The FTAA2024 includes requirements to provide contact details of adjacent landowners and occupiers. For resource consent applications, Schedule 5 outlines these requirements in clause 5(1)(d) which states that a resource consent application must include the full name and address of each owner of the site and of land adjacent to the site and each occupier of the site and of land adjacent to the site whom the applicant is unable to identify after reasonable inquiry.

359. The contact details for each landowner of the site, and all adjacent owners and occupiers (where able to be identified after reasonable enquiry) are attached in **Appendix 28**.

360. The persons and groups that NTP consider are likely to be affected by the project include the owners and occupiers of adjacent sites (see **Appendix 28**) and those who have been consulted (see **Appendix 18** and **Appendix 22**)

Mitigation Measures

Mitigation Measures & Monitoring

361. The Act outlines several requirements and considerations for setting consent conditions, depending on the type of approval sought. Clause 17 of Schedule 5 sets out the criteria and other matters for the assessment of a consent application, and clause 18 of Schedule 5 the provisions of the RMA relevant to setting conditions.

362. When setting conditions on a resource consent, the panel must apply Parts 6, 9, and 10 of the RMA that are relevant to setting conditions on a resource consent, subject to all necessary modifications (e.g. a reference to a consent authority is read as a reference to a panel). Section 83(1) of the Act specifies that a panel when exercising a discretion to set a condition under the Act, must not set a condition that is more onerous than necessary to address the reason for which it is set, in accordance with the provision of the Act that confers the discretion.

363. The conditions proposed as part of the application to address adverse effects or to cover aspects of the subdivision approval for infrastructures design / vesting are attached in **Appendix 14**. This includes monitoring conditions, that describe how and by whom effects will be monitored if the activity is approved.

364. Section 85(3) of the Act relates to a panel discretion to decline an approval under the Act. It does not remove the duty under s 5 of the RMA (as referenced to in the Act) to avoid, remedy or mitigate adverse effects[9]. In this regard, s 108 and s 108AA of the RMA (as referenced in clause 18 of Schedule 5 of the Act) provide the basis for imposing conditions of consent that would avoid, remedy or mitigate any adverse effects. The only limitation the Act applies in terms of conditions is expressed in s 83, which requires that conditions cannot be more onerous than necessary to address the reason for which it is set in accordance with the provisions of the FTAA2024 that confers the discretion.

Consideration of Alternatives

365. The preceding assessment of effects shows that the proposal will not have any significant adverse effects on the environment. Therefore, an assessment of alternatives is not required.

Resource Management Act 1991 Considerations

s106 Considerations

366. Section 106 of the RMA states:

> *(1) A consent authority may refuse to grant a subdivision consent, or may grant a subdivision consent subject to conditions, if it considers that—*
>
> *(a) there is a significant risk from natural hazards; or*
>
> *(b) (repealed)*
>
> *(c) sufficient provision has not been made for legal and physical access to each allotment to be created by the subdivision.*
>
> *(1A) For the purpose of subsection (1)(a), an assessment of the risk from natural hazards requires a combined assessment of—*
>
> *(a) the likelihood of natural hazards occurring (whether individually or in combination); and*
>
> *(b) the material damage to land in respect of which the consent is sought, other land, or structures that would result from natural hazards; and*
>
> *(c) any likely subsequent use of the land in respect of which the consent is sought that would accelerate, worsen, or result in material damage of the kind referred to in paragraph (b).*

367. This section of the RMA is particularly relevant in relation to geotechnical concerns following the Canterbury Earthquakes. Geotechnical and flood hazards have been covered in the effects assessment above and in **Appendix 5**.

368. The geotechnical assessment by KGA Geotechnical recommends the need for lot-specific geotechnical reports to address the specific design criteria of each new structure at the site at time of building consent. A condition and consent notice to this effect are proposed in the conditions package (**Appendix 14**). Overall, the assessment concluded that the site is geotechnically suitable for a subdivision and future industrial construction.

[9] While the duty is not removed, the purpose of the Act has primacy in the panel's considerations.

369. The advice provided regarding the risk of geotechnical and flood natural hazards is accepted, and it is concluded that there are no grounds to refuse consent under section 106(1)(a).

370. In terms of section 106(1)(c) adequate legal and physical access is provided to each allotment.

Part 2 Sections 5, 6 and 7

371. Information requirements under the Act require an assessment of the activity against sections 5, 6, and 7 of the RMA. Further, clause 17(2)(a) of Schedule 5 of the Act states that a reference in the RMA to Part 2 of the Act must be read as a reference to sections 5, 6 and 7 of the Act (i.e. it removes s 8 as a Part 2 consideration).

372. Section 5 of the RMA sets out its purpose, as follows:

> **5. Purpose**
>
> (1) The purpose of this Act is to promote the sustainable management of natural and physical resources.
>
> (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—
>
> (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
>
> (b) Safeguarding the life-supporting capacity of air, water, soil and ecosystems; and
>
> (c) Avoiding, remedying or mitigating any adverse effects of activities on the environment.

373. The proposal provides for the use and development of the site in a way that enables the applicant and future owners and occupiers to provide for their wellbeing, without detracting from the wellbeing of the wider community or detracting from the matters listed in s5(2)(a) – (c).

374. Whether Part 2 of the RMA (in terms of the FTAA2024) is being met also involves an assessment informed by reference to the matters set out in sections 6 and 7 of the RMA.

375. Section 6 sets out matters of national importance – none of which are offended by this application, noting that the proposal:

- does not affect the coastal environment;
- does not affect any outstanding natural features and landscapes;
- does not affect any areas of significant indigenous vegetation or significant habitats of indigenous fauna;
- does not affect public access to and along the coastal marine area, lakes, and rivers;
- recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga, as described earlier in this assessment and with reference to the IMP, subdivision and development guidelines, and the consultation undertaken;

- does not affect historic heritage;
- does not affect protected customary rights;
- is not subject to any significant risks from natural hazards (and otherwise recognises and provides for natural hazard risks).

376. Section 7 requires particular regard to be had to 'other matters.' Of relevance to this application, the proposal:

- Has had particular regard to kaitiakitanga and the ethic of stewardship as demonstrated through consultation with Rūnanga (**Appendix 22**) and the corresponding assessment of cultural effects (subsection (aa));
- Represents an efficient use and development of (finite) natural and physical resources, namely the land resource, accounting for the assessment of economic costs and benefits in **Appendix 16** (subsection (g));
- Supports the maintenance and enhancement of amenity values and the quality of the environment, as demonstrated in the assessments of landscape, visual amenity and urban design effects in **Appendix 11** (subsection (f));
- Has had particular regard to, and managed the intrinsic values of ecosystems per the ecological assessments in **Appendix 7**, **Appendix 8** and **Appendix 9** (subsection (d)); and
- Has had particular regard to the efficiency of the end use of energy, the effects of climate change and the benefits to be derived from the use and development of renewable energy as demonstrated by the greenhouse gas emissions assessment in **Appendix 19** (subsections (ba),(i) and (j)**.**

377. Overall, the proposal is consistent with the requirements of Part 2 (i.e. sections 5, 6 and 7), and therefore, it is considered that the purpose of the RMA would be better achieved by the granting of consent.

Conclusion

378. This application must be considered in light of the purpose of Act which is to "*facilitate the delivery of infrastructure and development projects with significant regional or national benefits*". The 'regional or national benefits' are the primary consideration in deciding whether to grant approval to a substantive application.

379. As detailed above, the Pound Road Industrial Development project will deliver significant regional economic benefits including driving regional economic growth, creating employment opportunities and increasing commercial activity. The project will address shortfalls in industrial and logistics development capacity in the vicinity of the airport, and Christchurch generally, and has been assessed by the economic experts to:

- **Result in Substantial job creation:** The project is estimated to support the creation of an annual average of **282 jobs** during the construction phase of the development, and approximately **4,192 jobs** over multiple years (including direct, indirect and induced jobs).

- **Provide a Significant contribution to Christchurch's Gross Household income:** The total impact of the project phases is estimated to add **$260 million** to Gross Household Income

- **Result in a Considerable increase in value added to the economy:** The project development is projected to add a **total of $568 million**[10] in Value Added to the Christchurch economy during its project phases

380. Regarding adverse impacts, for the purpose of s85(3) of the Act, the above assessment, informed by relevant experts, demonstrates that the proposal will:

(1) Have no more than **minor** and **acceptable** actual or potential adverse effects on the environment; and

(2) Be generally **consistent** with the applicable statutory and non-statutory planning instruments and provisions in an overall sense.

381. Accordingly, there are no adverse impacts that reach the threshold of a "sufficiently significant adverse impact" such that they need to be considered in terms of an assessment under s 85 of the FTAA2024.

382. Overall, taking into account the purpose of the Act as the primary consideration, this assessment concludes that there is no basis to decline the approvals sought in this application.

This AEE has been prepared by Jeremy Phillips and Georgia Brown of Novo Group Limited. Their relevant qualifications and experience is outlined in **Appendix 29.**

[10] In 2020 NZ dollars

Appendix 1: Applicants/ Authorised Persons' Statement

Appendix 2: Certificate of Titles

Appendix 3: Davie Lovell Smith Scheme Plan

Appendix 4: Acoustic Assessment

Appendix 5: Geotechnical Assessment

Appendix 6: Detailed Site Investigations and draft Remediation Action Plan

Appendix 7: Terrestrial Ecological Assessment

Appendix 8: Lizard Management Plan

Appendix 9: Aquatic Ecology Assessment

Appendix 10: Integrated Transport Assessment

Appendix 11: Landscape and Visual Impact and Urban Design Assessment

Appendix 12: Infrastructure Report

Appendix 13: Earthworks Management Plan

Appendix 14: Consent Conditions

Appendix 15: Compliance Assessment

Appendix 16: Economic Assessment

Appendix 17: Land Market Demand Assessment

Appendix 18: Consultation Documents & Records

Appendix 19: Greenhouse Gas Emissions Assessment

Appendix 20: Highly Productive Land and Soils Assessment

Appendix 21: Assessment of Ngāi Tahu subdivision and development guidelines

Appendix 22: Te Rūnanga o Ngāi Tahu and Ngāi Tūāhuriri feedback

Appendix 23: Assessment of Planning Provisions

Appendix 24: Legal Statement on Highly Productive Soils

Appendix 25: Schedule 7(2) Wildlife Act Approval

Appendix 26: s30(3) Notice – Canterbury Regional Council (Environment Canterbury)

Appendix 27: s30(3) Notice – Christchurch City Council

Appendix 28: Contact Details of Adjacent owners and occupiers

Appendix 29: Statement of Experience