

Your Comment on the Pound Road Industrial Area Application

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Canterbury Regional Council		
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Home phone / Mobile phone		Work phone	
Email (<i>a valid email address enables us to communicate efficiently with you</i>)			

2. We will email you draft conditions of consent for your comment			
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Please provide your comments below, include additional pages as needed.

Thank you for your comments

4 November 2025



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Mr Chris Thomsen

Expert Panel Chair

substantive@fasttrack.govt.nz

Tēnā koutou,

Attention: The Chair and Members of the expert Panel for Pound Road Industrial Development

Ngai Tahu Property Limited – Fast-track Consent Application – MINUTE 2 OF THE EXPERT PANEL- Canterbury Regional Council comment on the substantive application for the Pound Road Industrial Development [FTAA-2505-10547] under section 53(2) of the Fast-track Approvals Act 2024.

Canterbury Regional Council (CRC) has reviewed the substantive application for the Pound Road Industrial Development Fast-track application and provides the following written comments, made in accordance with section 53(2) of the Fast-track Approvals Act 2024. These comments summarise CRC's overall feedback on the proposal. The technical support for the feedback is contained in Appendices 1 – 5 attached to these comments, and a marked up version of the Condition Set is in Appendix 6.

Summary

1. CRC's review of the application has not identified any material matters of contention.
2. The proposal is generally considered to align and be consistent with the relevant objectives and policies and rules set out in the Canterbury Land and Water Regional Plan (LWRP) and the Canterbury Air Regional Plan (CARP).

3. CRC considers that any adverse environmental effects that may arise from the proposal can be appropriately avoided, remedied or mitigated subject to (amended) conditions of consent, should the Panel approve the application.
4. CRC has been working with the Applicant regarding consent conditions in advance of these written comments. There are, however, further changes still considered necessary. A set of conditions showing those changes CRC considers are necessary are in Appendix 6.
5. The key outstanding matters in the condition set relate to:
 - a. The Applicant will need to provide the relevant plans attached to each condition set and referred to in the conditions that identify the location and/or area of the activity.
 - b. The Applicant will need to provide more detailed information regarding which Land and Water Regional Plan water quality tables they are referring to in their discharge consent.
 - c. The Applicant will need to provide additional information regarding the inspection and maintenance of soakage pits condition in their discharge consent.
 - d. In their operational phase discharge consent, the Applicant has added a construction phase condition regarding spills. This needs to be deleted and the operational phase condition added.
 - e. The Applicant needs to provide their requested duration for the requested consents. CRC has set out recommended durations for each consent in Appendix 6.
 - f. Two additional conditions have been recommended by CRC's contaminated land expert and are set out in Appendix 6.
6. The other changes to the conditions are explained in the condition set and are generally minor drafting changes that are considered necessary for certainty/clarity.
7. CRC is open to continuing to work with the Applicant on the conditions as we move forward.
8. While acknowledging the Panel will determine the application under the purpose and provisions of the Fast-track Approvals Act 2024 (FTAA), and will give more weight to the purpose of the FTAA than to the relevant parts of the Resource

Management Act 1991 (RMA), clause 17 of the FTAA still requires the Panel to consider the matters listed in the RMA on an individual basis, prior to standing back and conducting an overall weighting.¹ CRC has therefore considered the proposal through an RMA lens, focusing on Parts 2, 3 and 6 of the RMA as relevant. A full statutory assessment under section 104(1) of the RMA has not been undertaken, rather an exercise undertaken to better understand the scale and nature of potential effects and how these might measure up. CRC planners consider the proposal aligns with the purpose and principles of the RMA.

Background

9. The substantive application by Ngāi Tahu Property Limited was lodged on 11 July 2025 and deemed complete under section 46(2) of the FTAA by the Environmental Protection Authority (EPA) on 13 August 2025.

Consultation

10. Consultation between CRC and the Applicant has been occurring since pre--lodgment of the application. Planning and technical staff have corresponded via meetings and emails throughout the process. Internally, CRC staff have met to discuss the Application to provide an opportunity for staff across different relevant disciplines to raise questions, identify issues and provide comments within their respective areas of expertise.
11. CRC provided high-level feedback via the Memorandum² filed for the purposes of the Panel Convenor Conference and the 'Issue' list in this Memorandum formed the basis of discussions going forward. CRC was provided with additional information, amended management plans and the updated proposed conditions along with Minute 2 of the Panel. Since then, CRC has sought planning and technical advice and have met with the Applicant to discuss the issues raised and the changes advanced in the updated information.

¹ Record of Decisions of the Expert Panel under Section 87 of the Fast-track Approvals Act 2024, for the Bledisloe North Wharf and Fergusson North Berth Extension, at [121(b)]

² Dated 5 September 2025.

Key Issues

12. CRC agrees that overall, the Applicant has appropriately identified and addressed the key issues of the proposal, subject to some further changes to conditions of consent that CRC considers are necessary and / or are minor drafting changes.
13. The key issues raised by the Application that are relevant to CRC are identified as:
 - a. Groundwater Effects
 - b. Terrestrial Ecology Effects
 - c. Surface Water Ecology Effects
 - d. Contaminated Land Effects
 - e. Policy Planning Effects
14. CRC's review of these key issues has been undertaken across the relevant areas of technical expertise (refer Appendices 1-5) and has been documented in the table of feedback below. The table of feedback captures the Applicant's assessment (summarised), CRC's assessment and any of CRC's recommended actions and/or conditions.
15. Based on a review of the relevant technical reports and updated technical reports and supporting assessments provided by the Applicant, CRC considers that the Applicant has adequately responded to the potential effects across the key areas relevant to CRC, subject to the changes in conditions set out in paragraph 5 above.
16. CRC considers that the key issues identified in the application can be appropriately managed and mitigated through robust conditions of consent.

Applicant's assessment summary	CRC technical assessment summary	CRC Changes required/conditions sought to address CRC's comment
Groundwater		
- As part of this proposal, the Applicant will require resource consent to discharge construction and operational phase stormwater to land. No other discharges of wastewater to land are covered by this Application. - Construction phase run off is proposed to be discharged to ground and operational phase stormwater from roof run off is proposed to have individual lots soaking all stormwater from roofs to ground within the lot. This consent is proposed to be partially transferred to future lot owners who will install the stormwater system for their particular lot. - As the site is within the Christchurch Groundwater Protection Zone, stormwater treatment is required, and the first flush will be treated via infiltration basins. - Stormwater from public roads, reserves and hardstand areas are proposed to be managed under CCC's Global Discharge Consent. - The Applicant's assessment of groundwater shows that the proposed development site is located over the unconfined/semi-confined Groundwater Aquifer System. They have stated that the groundwater is deep and fluctuates between 13m-17m depth below ground level (bgl). The site generally comprises of silty/sandy soils over dense gravels. - The Applicant did not encounter groundwater at any of the site-specific tests that were carried out and because of the	- CRC's groundwater specialist, Mr Hanson has peer reviewed the Application. His technical advice is in Appendix 1 and his views are summarised below. - Mr Hanson agrees with the Applicant and concludes that the proposed development at Pound Road does not pose a threat to groundwater quality. - He agrees with the Applicant's description of the ground and groundwater characteristics and is satisfied that the design of the stormwater infiltration basins will ensure that contaminants are removed to avoid adverse effects on groundwater. - Mr Hanson agrees that the Applicant's proposed consent condition to remediate all contaminated land prior to works occurring will be sufficient to prevent leaching of contaminants into groundwater.	The Applicant's proposed conditions are sufficient and no changes are needed with respect to groundwater.

Applicant's assessment summary	CRC technical assessment summary	CRC Changes required/conditions sought to address CRC's comment
deep groundwater no visible springs or other natural surface water features were identified. • Development of the site and the associated earthworks are proposed to be undertaken in four stages. The maximum earthwork cut depths are proposed to be approximately 5.0-5.5m bgl with groundwater not expected to be encountered. • The effects of the proposed stormwater discharges to ground is considered by the applicant to be appropriately managed through the stormwater management plan. The Community Drinking Water Protection Zone does not overlap the site and is not expected to have any adverse effects on drinking water supplies. • Overall, the Applicant states that the proposed stormwater management plan will adequately manage any potential effects on groundwater quality. They also state that the effects on groundwater associated with discharge are considered to be less than minor subject to conditions of consent and an erosion and sediment control plan.		
Terrestrial Ecology		
• The Applicant's terrestrial ecologist assessed the site in relation to vegetation and flora, avifauna and invertebrates, including lizards. • The ecologist concluded that on-site vegetation is highly modified. Indigenous vegetation has been cleared and land planted with exotic pasture grasses, crops and trees. • The ecologist considers the site to be 'significant' under both the Canterbury Regional Policy Statement (RPS) and the	• CRC terrestrial ecologist, Ms Jack, has provided input to the management of native lizards and has worked with the Applicant to identify suitable sites on CRC land for lizard relocation. Ms Jack is now satisfied with the updated LMP. Her technical advice is in Appendix 2. • Ms Jack also agrees with the updated wetlands assessment carried out by the	• The Applicant's proposed conditions are sufficient and no changes are needed with respect to terrestrial ecology .

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National Policy Statement for Indigenous Biodiversity (NPS-IB) as there is potential for the presence of southern grass skink, the New Zealand praying mantis and the tōrea/South Island pied oyster catcher. • During the site survey the Southern Grass Skink was found to be present, however the New Zealand Praying Mantis and the Tōrea were not. • Initially the Substantive Application as lodged proposed to mitigate any adverse effects on skinks/lizards by way of a Lizard Management Plan (LMP) including methods for salvage, relocation and incidental discovery protocol. • The LMP that was provided set out the lizard values on site, and anticipated salvage and relocation of the lizards during site works. It stated that all lizards will be trapped and relocated to the neighboring Templeton Golf Course where a release site will be established. • Through the process of consultation, CCC, the Department of Conservation (DOC) and CRC technical experts voiced their concerns regarding the Applicant's proposed lizard management. The Applicant has worked through this issue in detail with DOC, CCC and CRC and an agreed lizard relocation programme has resulted (as provided with the Minute 2 additional information). • The Applicant's ecologist did observe some hydrological indicators of potential wetland habitats that were not initially investigated. Since conversations with CRC and CCC, the Applicant has carried out an on-site survey and has concluded that there are no wetlands present on site.	Applicant's consultant and agrees that no natural inland wetlands occur on site. • While Ms Jack's primary recommendation is that the proposal be reconsidered so that some areas of lizard habitat be avoided, Ms Jack also agrees that the Applicant's proposed conditions are appropriate to address actual and potential effects on land ecology values.	

Applicant's assessment summary	CRC technical assessment summary	CRC Changes required/conditions sought to address CRC's comment
Surface Water Ecology		
- The Applicant's freshwater ecologist has assessed the freshwater habitat and ecology at the development site. They conclude that there are no natural surface water features within the site. They do note that the water race that flows along Barters Road is an artificial feature but may contain the potential for native fish populations. The water race partially flows into the site. - A field survey was undertaken and a very low habitat value for the water race was determined. - The proposed development will remove the internal artificial waterway; however, the Applicant has provided mitigation for this loss. - Two culverts will be required within the Barters Road Drain. The Applicant's ecologist has recommended that several mitigations will need to be provided as part of the conditions for culvert installation.	- CRC's surface water ecologist, Mr Meijer, agrees with the ecological assessment provided by the applicant's consultants. His technical advice is in Appendix 3. - Mr Meijer also agrees with the proposed methodology for culvert installation and considers that the Applicant's proposed conditions of consent adequately address other potential risks to water quality and ecological values in the adjacent water race.	The Applicant's proposed conditions are sufficient and no changes are needed with respect to surface water ecology.
Contaminated Land		
- The Applicant's contaminated land expert carried out several Detailed Site Investigation's (DSI). - They conclude that the contamination requiring remediation stems from historical burn piles across the site, dumped material, an above ground storage tank, and areas of asbestos. - Soil sampling was undertaken across the site, and they identified several areas of contamination that exceeded commercial/industrial levels. Because of this, the National Environmental Standard for Assessing and Managing	- CRC's contaminated land expert, Mr Cromwell, assessed the AEE and relevant technical reports provided by the Applicant. His technical advice is in Appendix 4. - Mr Cromwell considers that prior to bulk earthworks occurring, remedial works must be undertaken. - Mr Cromwell also considers that the majority of the site has been	Relying on Mr Cromwell's technical advice: - CRC considers that in relation to the CRC Land Use consent, an updated RAP and SVR should be provided to CRC after remediation and prior to bulk earthworks commencing. - CRC considers that in relation to the CRC Discharge Permit

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Contaminants in Soil to Protect Human Health Regulations 2011 (NES-Soil) applies. - Because of the presence of contamination, the Applicant stated their expert will develop a Remedial Action Plan (RAP), and a Site Validation Report (SVR). - The Applicant has stated that further testing will be required and a full DSI and final RAP will be completed prior to the commencement of any bulk earthworks and stormwater discharge. These will be provided to the councils. - Overall, the Applicant concluded that contaminated soil can be managed through standard industry practices.	appropriately investigated; however, there are some information gaps that will require additional investigation, remediation, and validation. - He would also like to see that any soak pits and stormwater basins within areas of contaminated soils have been remedied and validated prior to any bulk earthworks occurring. - He agrees with the Applicant that once remediation is completed and validated, the contaminant levels will be acceptable for the proposed development. - Mr Cromwell has proposed two consent conditions that he considers would mitigate any adverse effects.	(Construction Phase) the remaining soils in proposed soak pit and stormwater basins have concentration levels that meet the guidelines prior to use. CRC's proposed changes to conditions are in Appendix 6. Refer to condition 5 in the s9- Land Use consent and condition 6 in the s15- Discharge (construction phase) consent.
Cultural values		
The Application lists consultation that has occurred with Whitiara, Te Ngāi Tūāhuriri Rūnanga and Te Rūnanga o Ngāi Tahu (Appendix 22).	CRC lodged a Papatipu Rūnanga Environmental Entities (PREE) request with Mahaanui Kurataiao Ltd (MKT) and no response was received.	CRC defer to the iwi parties invited to comment.
Policy Planning		
The Applicant has assessed 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	CRC's expert policy planner, Ms. O'Brien, has provided an assessment of the relevant NPS regulations and the RPS (Appendix 5).	Relying on Ms O'Brien's advice, CRC does not seek any additional changes or conditions (aside from what is recommended in Appendix 6).

Applicant's assessment summary	CRC technical assessment summary	CRC Changes required/conditions sought to address CRC's comment
2022 (NPS-HPL) and the National Policy Statement for Urban Development 2020 (NPS-UD). - Overall, the Applicant has concluded that the proposal is consistent with the NPS-FM and the NPS-IB. The Applicant has concluded that the NPS-HPL does not apply to the proposed development site, however, regardless of whether it applies or not, the Applicant considers it to be generally consistent with the NPS' provisions. - The Applicant also considers that overall, the proposal is consistent with the NPS-UD stating that the proposal will add significantly to development capacity and to a well-functioning urban environment. - The Applicant has also assessed the Canterbury Regional Policy Statement 2013 (RPS), the LWRP and the CARP. - The Applicant's planning expert found the proposal to be consistent with the overall objectives and policies of these documents. The Applicant does recognise that there is some tension with the provisions of Chapter 6 of the RPS as the proposed site is not located in an identified Greenfield Priority Area. Despite this, the Applicant remains of the view that the proposal would not be out of place in terms of the existing surrounding land uses and infrastructure availability. - The Applicant has assessed the Mahaanui Iwi Management Plan and found the proposal to be generally consistent with its provisions. - The Canterbury Land Transport Strategy was also assessed, and the expert has concluded that the site has good connectivity to the local and strategic transport network.	- She notes that only a brief assessment has been carried out by the Applicant on the requirements of the NPS-FM, the NPS-IB and the NPS-HPL. - Ms O'Brien notes that the conclusions drawn in the Applicant's assessment of the proposals against the NPS-UD are dependent on whether the Panel deems the proposed site to be within an urban environment. - In terms of the RPS, CRC's expert agrees with the Applicant that the main issues associated with the proposal relate to development outside of an identified Greenfield Priority Area and loss of primary production and versatile soils. She also considers that the proposal slightly diverges from the policy direction in the RPS, but that the conditions proposed by the Applicant regarding infrastructure will continue to allow for its safe operation. - Regarding out of sequence development, the proposed site is not within the existing urban area, a Greenfield Priority Area for business development or a future development area identified in Map A of the RPS. Ms O'Brien notes that the proposed site borders the industrial zone	

Applicant's assessment summary	CRC technical assessment summary	CRC Changes required/conditions sought to address CRC's comment
Overall, the Applicant's expert concluded that the proposal is generally consistent with the relevant provisions in an overall sense. As such, the Applicant is of the view that there are no conflicts with provisions that reach a sufficiently significant adverse impact under s85 of the FTAA 2024.	and although the development is out of sequence, the development may not necessarily be in an inappropriate location. - The benefit as identified by Ms O'Brien is that development will enable people and communities to provide for their economic well-being (Objective 5.2.1 RPS). The development is proposed to occur close to an existing urban area and transport. - CRC has sought advice from a consents planner who has advised that they agree that the proposal is consistent with the objectives and policies of the LWRP and the CARP and generally agrees with the Applicant's assessment. For this reason and because of the consensus of views on the LWRP and the CARP, CRC has not set this out in a separate report/appendix.	

Regional benefits

17. The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.
18. While ultimately a matter for the Panel, the application has described the regional and national benefits of the industrial development at Pound Road.
19. The Applicant's economic consultant, Savvy Consulting, has assessed the regional benefits of the proposal. It is expected to deliver significant regional economic benefits in both the construction and operational phases, estimated to contribute \$568 million and 4,192 jobs to the Christchurch economy.
20. It has been identified by Savvy Consulting that there will be limited economic costs associated with the loss of rural land and rural production.
21. The benefits of the industrial development at Pound Road as set out by Savvy Consulting, are not being questioned by CRC. An economic assessment was not undertaken by CRC.

CRC's Concluding Comments

CRC have reviewed the substantive application and technical appendices for the proposed Pound Road Development by Ngai Tahu Property Limited. CRC's view is that there are no fundamental issues that cannot be resolved through amendments to CRC's proposed consent conditions.

Yours sincerely



Brett Aldridge
Director Operations

Appendices- as separate attachments

Appendix 1: CRC Technical Advice- Groundwater- Mr. Carl Hansen

Appendix 2: CRC Technical Advice- Terrestrial Ecology- Ms. Jean Jack

Appendix 3- CRC Technical Advice- Surface Water Ecology- Mr. Chris Meijer

Appendix 4- CRC Technical Advice- Contaminated Land- Mr. Edward Cromwell

Appendix 5- CRC Technical Advice- Policy Planning- Ms. Isolina O'Brien

Appendix 6- CRC's Proposed Conditions Table