18 December 2025

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Fast Track Approvals Act 2024 – FTAA-2504-1054

Christchurch City Council Reference – RMA/2025/1208

104 RYANS ROAD, HAREWOOD

1. The purpose of this letter is to respond to the request for further information under from the Christchurch City Council (CCC) made by the Expert Panel in Minute 6, dated 10 December 2025.

2. A number of requests were made to the CCC, broadly relating to transport matters, being the adequacy of assessment provided by the Applicant and reasons for conditions recommended, and legal mechanisms to ensure proposed stormwater management for individual lots will be implemented and enforced.

Transport

3. Andrew Milne, Team Leader Asset Planning Transport, has reviewed the transport assessment provided by the Applicant under section 55 and the requests for further information made by the Panel. Mr Milne's response is attached in Appendix 1 and summarised below.

4. Appendices to the transport comments provided by the CCC under section 53 were not included with the full comment provided to the EPA on 15 September 2025. This was identified by the Applicant's representatives and the appendices were provided directly to the applicant on 30 September 2025. The appendices, referred to as 8a and 8b, are attached to this response.

Adequacy of assessment

5. The adequacy of the assessment undertaken by Nick Fuller on behalf of the applicant has been considered by Mr Milne in paragraphs 1-24 of his memo. In brief, Mr Milne highlights:

5.1. The CAST model relied on, while being the best available at the time, is based on 2018 census data and includes limited growth. Accordingly, Mr Milne considers that this reduces the level of confidence in the results and conclusions drawn.

5.2. In terms of interpreting the modelled results, that CAST model itself includes a number of assumptions relating to the functioning of the transport network that may not be borne out, while the trip generation rates are generic and may differ significantly from the activities that may ultimately establish. Accordingly, caution should be applied when applying CAST traffic volumes to the SIDRA model of intersection function. Notwithstanding, the modelled results show poor levels of service for critical movements.

5.3. Calibration of the SIDRA model occurred at a time when works affecting the operation of the Ryans Road and Grays Road were being carried out, and would not be representative of normal operating conditions.

5.4. Modelling still relies on assumed improvements in the wider network that are not certain or funded.

6. Mr Milne concludes that the assessment provided includes uncertainties that can be best managed via conditions of consent recommended by the CCC in comments under section 53, being additional assessment and a staging condition.

7. Acknowledging the Applicant's preference to avoid a staging condition, Mr Milne highlights that the Council would be open to working with the Applicant and other parties to investigate upgrades to the Pound Road/Ryans Road intersection.

Necessity for shared path connections

8. In terms of the Panel's questions relating to the conditions recommended by CCC requiring shared paths with a width of 2.5m along Ryans and Grays Road, Mr Milne has addressed these issues in paragraphs 25-38 of his memo.

9. As noted by Mr Milne, the application proposes to subdivide and use land for industrial purposes within a rural zone, as is the surrounding area. Accordingly future development or strategic planning with a view to urban development in the surrounding area has not been undertaken at this stage.

10. I note that that greenfield development across a wide area incorporating a number of property owners would typically be coordinated through an Outline Development Plan included in the District Plan, including specifying the location and standard of transport infrastructure.

11. Notwithstanding the absence of anticipated future urban development to the west of Pound Road, Mr Milne notes that other upgrades in the area, including the Pound Road improvements, may contribute to increase demand for cycle infrastructure. While the shared paths will not link to similar infrastructure in the short term, they will connect other parts of the transport network more suitable for shared traffic by nature of their formation, road classification, and sped limit, for example George Bellew Road.

12. Noting that no further subdivision consent is likely to be required to the Ryans Road frontage of 104 Ryans Road, this application may be the only opportunity to secure a shared path in this location in the short to medium term.

Undergrounding of power lines

13. With regard to the Panel's request for reasoning for the condition recommended by CCC for the undergrounding of powerlines along Ryans Road, Mr Milne has addressed this in paragraphs 39-46 of his memo.

14. In brief Mr Milne notes that changes to the layout of Ryans Road will reduce the clear zone between traffic lanes and existing power poles, while the industrial activity will increase the volume of traffic on Ryans Road. In combination these factors contribute to an increased likelihood of vehicle collision. Additionally, the nature of a non-frangible power pole increases the safety risks for occupants of vehicles, due to rapid deceleration of the vehicle, and first responders, due to downed live power lines, with a number of nuisance effects for other road users and utility subscribers also possible.

15. Undergrounding of powerlines and establishment of frangible lighting poles aligns with CCC *Infrastructure Design Standards*, NZTA *Specifications for Lighting Columns and Light Design*, and Orion's *Network Connection Standards*, and contributes to the safety of road users.

Stormwater management

16. The Panel has sought comment on what condition mechanisms will require individual lot owners to implement and comply with the various stormwater treatment requirements imposed in the resource consents.

17. It is noted that the Request for Further information was made to both the CCC and the Canterbury Regional Council (CRC), with the authorities invited to respond jointly or separately. CCC has liaised with the CRC and consider a separate response is appropriate in this case.

18. Ongoing compliance with regional consent conditions is ultimately a matter for the Regional Council to comment on, and the CCC defers to their response in this regard.

19. Brian Norton, Senior Stormwater Planning Engineer at the CCC, noted risks inherent in the proposed management of stormwater on individual sites and inconsistency with the CCC's Waterways, Wetlands and Drainage Guide in paragraph 8 of his evidence. Notwithstanding, in assessing the activity proposed Mr Norton recommended a condition requiring consent notices to ensure stormwater will be managed within individual sites, in particular achieving minimum treatment and infiltration standards.

20. The wording of this condition and consent notice is agreed between the Applicant and CCC, as set out in the commentary provided by the Applicant on Condition 63 in Appendix 03, Part 2: Christchurch City Council Subdivision Consent Conditions.

21. It is the view of CCC that the consent notice proposed will be appropriate to ensure adequate provision for stormwater collection, treatment, and disposal will be achieved and maintained on site, with a mechanism for enforcement if necessary.

22. Disposal of surface water to an appropriate outfall is a relevant consideration under Clause E1.3.3 of the Building Regulations 1992 (Building Code), which requires that surface water be conveyed to an appropriate outfall, which includes soakage systems. This outfall will be verified during the building consent process, however compliance of the system with regional council consent conditions is not assessed, this being the responsibility of the consent holder to achieve, and the CRC to monitor.

23. CCC systems can be updated to highlight particular sites are subject to a regional council consent for stormwater disposal. This would then be identified during the building consent process, at which time the building consent applicant would be reminded of their obligations under the resource consent, and shown in a Land Information Memorandum to inform prospective purchasers.

Conclusion

24. Council Officers are available to provide further information or engage in caucusing, mediation, or a hearing limited to a particular issue if necessary to assist the Panel, however it is noted that availability of specific officers may be limited in early 2026.

Assessment officer:	Delegated authority:
[redacted] Francis White Senior Planner	[redacted] Paul Lowe Manager Resource Consents

Appendix 1 – Transport Asset Planning Memo, Andrew Milne

Transport Asset Planning

Memo

Date: 15 December 2025

From: Andrew Milne, Asset Planning, Transport

To: Francis White Senior Processing Planner

Cc: Brent Pizzey, Senior Legal Council

As directed by the Panel, this memo sets out Councils response to transport matters highlighted in Appendix 1 to MINUTE 6 OF THE EXPERT PANEL - Invitation to comment Ryans Road Industrial Area [FTAA-2504-1054] (10 December 2025).

My comments respond to the transport matters taken from the above Minute and italicised below:

1) *The analysis and conclusions expressed by Mr Fuller (see Appendix 07: Memo: - 'FTAA-2504-1054: 104 Ryans Road, Christchurch Applicant S55 Response to Transport Comment'; prepared by Nick Fuller of Novo Group, 19 November 2025) regarding the current and future functioning of the Ryans Road / Pound Road intersection, and the need or otherwise for staging of the development and monitoring of traffic effects on that intersection.*

   Model Version

2) The project CAST model relied upon by Mr Fuller was necessarily based on the most up-to-day model release at the time of forming information to support the application. However, that model release is based on 2018 census data. Councils own CAST project model for the western area uses more recent growth data and indeed the CAST model is currently undergoing a significant update as commissioned by CCC, NZTA, Ecan, SDC, WDC to reflect better growth assumptions based on 2023 census data.

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3) This would offer a sounder basis on which to assess future infrastructure needs and will form the basis of NZTA's SH1 Hornby Access and Development study.

4) The current project model includes limited growth – allowing only for an uplift in trips from:
    i. Dakota Park
    ii. Waterloo Park
    iii. South Hornby
5) It takes no account of potential growth areas that Council has investigated following expressions of interest from landowners in the general area or the current industrial Fast-track (9000vpd) application at the southern end of Pound Road (FTAA-2505-1057).

6) Reliance on a now outdated model that doesn't take full account of wider growth that has occurred since 2018 and doesn't capture growth predictions as determined from the 2023 census data reduces the confidence in the results and subsequent conclusions drawn from the model relied upon by Mr Fuller.

Model Interpretation

7) CAST is an equilibrium model which uses the technique of assigning traffic to the road network on the basis of a lowest-cost route between an origin and destination. The model as part of calculating the lowest-cost route considers road network capacity constraints and reassigns traffic to avoid congestion until a state of equilibrium (i.e. generalised lowest journey cost across the network) is achieved.

8) The apparent reduction in traffic volumes as reported by the section 55 response arises through a combination of simplification in the transport modelling framework and the fact that, areas closer to the site are predicted to be under fairly heavy demand, compared to the capacity of the wider surrounding road networks. Essentially the apparent reduction in traffic is an artifact of how the model reassigns traffic based on lowest-cost routing to create equilibrium.

9) While assignment models are a valid method used by transport planners, there are two issues with the application of the assignment approach in this instance that require caution when drawing conclusions from their outputs:

    a. The model assumes that all traffic has perfect, prior knowledge of network congestion and what alternative lower-cost routes will be taken by traffic. This is an idealised representation of driver

behaviour and is used as a necessary modelling simplification. In reality, not all network users will choose to reassign for a range of reasons such as:

i. They didn't have prior knowledge of the congestion or a quicker alternative route;
ii. Not all road users will choose a route solely based on a lowest-cost decision.

b. General trip rate assumptions have been used in the absence of more detailed knowledge of the activity that will eventually establish on site. The effects of this may vary greatly from the trip rate of the activities that may ultimately establish on the site, particularly the timing of the peak trip generation relative to the network peak.

10) Some caution should therefore be applied when traffic volumes from CAST are used as an absolute input to the deterministic SIDRA model particularly given the slim margins for error between the intersection operating successfully or not.

11) Notwithstanding the above, the S55 SIDRA results show poor levels of service on critical movements.

Calibration

12) To bring a model to a closer representation of its subject road network performance, a calibration exercise should be undertaken. I note in Appendix 1 of Mr Fuller's S55 response that this has been attempted.

13) SIDRA guidelines require observed queues, delays, saturation flows and signal settings for calibration; observations affected by temporary road works must not be used as calibration inputs because they break the requirement for "normal operating conditions" and general SIDRA calibration practice.

14) However, as there were nearby significant road works on Ryans Road and Grays Road associated with underground cabling for the Kowhai Park development (not road upgrades), any observations of traffic conditions and behaviours at the Ryans Road/Pound Road intersection during that time would be unrepresentative of normal conditions which would invalidate any adjustments made to the model.

Modelled Network Assumptions

15) The modelling provided still relies upon the wider NZTA improvements to allow non-development traffic to reassign away from Ryans/Pound. This approach could be considered fanciful as it:
    - predetermines what the outcome and findings of NZTA's strategic study will be; and
    - assumes that any infrastructure upgrades identified from the study will be implemented and funded.

16) While the future study may provide a strategic traffic solution for the wider area and indeed may subsequently be funded, to rely upon such an outcome to support the proposition that no future changes to Ryans/Pound intersection are necessary carries some risk.

Modelled future Growth

17) Councils own plan change modelling for the western corridor, based on an updated project model for the area, that includes this fast-track proposal, indicates significantly higher volumes on the Pound Road and Ryans Road approaches to the intersection. Whilst these potential growth areas are yet to be formalised as either Council or private plan changes, there is nevertheless some expectation of further likely growth in the area around the fast-track proposal that have not been considered.

18) Council's independent review of the modelling approach, undertaken by Stantec, identified that:
    a. the future growth may be underestimated and offered that this may be caused by land use forecasts being out-of-step with the 2021 base.
    b. SIDRA model was uncalibrated

19) Mr Fuller's S55 response does not satisfactorily address these issues in that no further investigation into the CAST modelling appears to have been undertaken and the SIDRA model calibration does not reflect current, normal operating conditions.

20) Assessing future-year impacts on infrastructure means that planning has to occur over a relatively long timeframe to account for general growth and traffic demands. This approach naturally accounts for growing demand over time from various sources such that the impact of a single development is less well defined as its effects blend into the noise of the general growth.

21) The most accurate and direct impacts of a particular development are therefore more discernible over a shorter period. Hence a periodic assessment of impacts is more likely to capture the true impacts of development in the network and allow for a timelier intervention.

22) The re-assignment process also means that the proportion of development traffic impacting on the local network, relative to non-development traffic increases as the non-development traffic seeks less congested routes. There is however still an external cost to the users of the network from this reassignment.

23) My assessment of the modelling presented in Mr Fuller's S55 response points towards a level of uncertainty that can best be managed through a condition of consent. The Pound Road/Ryans Road intersection plays a critical role in the safe and efficient functioning of the surrounding strategic road network as well as a critical 'front-door' point of entry to the area and the development site. Given the uncertainty in the modelling that has been undertaken and the potential safety issues that arise from poor levels of service, I remain of the view that periodic monitoring of the intersection performance that allows the roading authority to manage an identifiable influence on the intersection performance by way of a staging mechanism offers one pragmatic, safe and appropriate response to the situation.

24) As set out in paragraphs 43-45 of my original Evidence report 15 September, I referred to the potential for a funding agreement. This provided for an alternative to a staging condition. A funding application to NZTA through a Business Case approach could be initiated by Council for the intersection upgrade, citing the additional demands placed on the network because of the fast-track proposal. Such a Business Case is likely to have a greater chance of being approved for co-funding by NZTA if Council can demonstrate affordability through third party funding. This would be Council's preferred approach to the situation.

25) *CCC has requested that the footpath along Grays Road and Ryans Road be formed as a 2.5m wide shared path. Mr Fuller for the Applicant notes that achieving that width on Ryans Road would require significant road widening, and the opportunity to achieve that is constrained by the proposed naturalisation of the Paparua water race, which is supported by CCC. Further, he concludes that there is no known connection beyond Ryans Road that would justify a 2.5m wide shared path.*

26) *Please expand on the reason for this request, including identification of any walking and cycling strategy or similar planning that indicates a future use or connection of that path to the west of the site and which justifies the 2.5m width that it is requested. Similarly, Mr Fuller indicates that such a 2.5m width along Grays Road would not connect to other similar shared paths. Again, please expand on the reason for this request, including by reference to existing or planned improvements that would connect to such a path.*

27) Ryans Road has a 20m wide road corridor which provides for adequate width to deliver a 2.5m shared path along the site frontage. This can be achieved by relocating the road centre line an additional 1 meter to the south (away from the water race). Council's asset engineers advise that there is sufficient length along Ryans Road to provide for an adequate transition to tie back into the existing carriageway on either side of the site frontage.

28) While Council has not yet received landowner interest in developing to the west of the application site, Council's current Pound Road upgrade project aims to provide targeted widening and shoulder strengthening to benefit the road strength but also to offer a higher level of service to cyclists in the area through the use of the widened shoulders and increased separation between cyclists and high speed freight traffic.

29) The completion of this project is anticipated to attract more cyclists to the area and as has been evidenced through the progress of the Major Cycle Route Programme which to-date has resulted in a 40% increase in cycle trips and projected to result in 14,000 fewer vehicle trips per day on completion[1] it is likely that cyclists in the area will be attracted to use a shared path facility along Ryans Road if provided. It is also anticipated that NZTA's SH1 – Hornby Access and Development project will investigate higher cycle provision in the area.

30) NZTA National Cycle Design Guidance[2] for treatments between intersections indicates thresholds for the separation of bicycles and motor vehicles according to traffic speed and volume. The guidance indicates that separated cycle paths should be considered where traffic volumes exceed 5000vpd. The traffic volume counts and analysis suggest that this threshold would be exceeded in the future with most of the traffic associated with the proposed development where no mitigations occur. The requested shared path would offer a safe, separated facility for the area. The frontage works are likely, once established, to be in existence beyond the life span of Councils' 30-year Transport Strategy, therefore it is reasonable for a facility that can address the future safety needs along Ryans Road and Grays Road is provided at a once-off construction stage of the development.

31) Current Council strategies do not consider cycling and walking routes along Ryans Road and Grays Road.

[1] Ōtautahi Christchurch Future Transport 2024–54 Our 30-year strategy for getting around, pp7 & 33

[2] Cycle route components between intersections | NZ Transport Agency Waka Kotahi

However, this is largely because development was not envisaged for this land when those strategies were developed. It would be unusual for Council to have planned walking and cycling networks in an area where the current zoning permits only minimal levels of development. If that expectation has now changed due to this out-of-zone fast-track application, then ideally it would follow that this portion of Council's strategies would be reviewed in time.

32) The requested 2.5m shared path represents a bare minimum level of infrastructure provision to ensure public safety in the face of the projected uplift in traffic volumes, of which a high proportion will be heavy vehicles.

33) In the medium-longer term it is likely that Council strategies will be reviewed, particularly in these locations of unplanned development, to ensure connectivity with the wider network.

34) From a general perspective Council seeks to accommodate growth through providing facilities for a range of road user groups based on various development opportunities including assets vested to Council. The following goals from the Strategic Transport Plan, highlight Council's vision for transport:

    a. *Goal 3: A safer transport network – Build and maintain safer infrastructure to ensure that everyone get to where they're going safely, regardless of how they are travelling.*
    b. *Goal 5: Improve alternative options to reduce transport emissions, increase road network efficiency and enable inclusive access for all transport users as our city grows.*

35) As a first mover developer, the fast-track application, through frontage upgrades, provides a rare, possibly unrepeatable opportunity to deliver infrastructure to achieve these goals.

36) Dakota Park to the east of the site contains a mixture of private CIAL and Council Roads. George Bellew Road is a Council road that connects directly to Grays Road. George Bellew Road was constructed to the industrial local road standards as they prevailed at the time it was built. This has a 14m road width and a posted speed limit of 50kph. Council traffic count data indicates traffic volumes below 5000vpd. Based on the above description, cyclists can currently safely use the road to connect to Grays Road.

37) The District Plan[3] in its description of the function hierarchy of roads identifies a range different networks including cycle networks and states that these networks are not specifically shown in the District Plan as they will be subject to change over time. However, they are an important part of Christchurch's transport network and will be considered as part of the Integrated Transport Assessment process.

38) For the reasons set out above, I maintain that the provision of a shared cycleway of minimal 2.5m width should be provided as part of the frontage upgrades of this development proposal.

39) *CCC has sought the undergrounding of power lines along Ryans Road. Please explain the reason for this request in terms of existing or future potential effects of the power lines on the use of the road.*

40) Council has a statutory responsibility, delivered through its policies and strategies, to ensure the safety and wellbeing of current and future communities. From a transport perspective, this responsibility is implemented through the Transport Strategy[4], including the adoption of a Safe System approach to road design. A core element of this approach is the Road Safety Audit (RSA) process, which is required before approval to work within the road corridor can take place. In my view, concept designs submitted through the consenting process should not diminish the role or outcomes of the RSA process. Allowing road works to proceed in "general accordance" with consent plans provides the necessary flexibility to achieve compliant and safe detailed designs.

41) Ryans Road currently serves a rural environment and provides an adequate level of service for that use. However, the fast-track proposal which introduces an urban road environment and a significant increase in traffic volumes requires that the upgrade works be designed to current safety standards.

42) Councils' application of its current standards[5], for higher speed, straight roads is that above-ground utilities must be set back at least 3 m from the edge of the traffic lane. Whilst the current Ryans Road carriageway varies in width along its length, in general, the current road layout and pole locations achieve a 3m clear zone requirement. It is therefore feasible to provide for a 2.5m shared path within this minimal 3 m clear zone. The proposed cross-section plans as provided and shown in Figure 1 of the S55

[3] Christchurch District Plan - Appendix 7.5.12 Road classification system

[4] Ōtautahi Christchurch Future Transport 2024–54 Our 30-year strategy for getting around, pp27

[5] Infrastructure Design Standard April 2022, section 8.15.10,

response indicates that the existing clear zone is compromised, and this creates a road safety hazard as well as falling below road design safety standards.

43) A solution to the compromised clear zone is to remove the existing non-frangible poles and underground the power supply and provide lighting columns that are frangible. Retaining the existing power poles in their current location while establishing a road upgrade that brings increased, passing traffic closer to these poles presents a significant safety risk, including:

a. severe injuries and fatalities in the event of a run-off-road collision.
b. Increased Fatality and Injury Risk: Collisions with solid, fixed objects like non-frangible poles are among the most unforgiving types of crashes. The rigid design means the vehicle decelerates extremely rapidly on impact, causing massive deformation of the occupant compartment and high G-forces on occupants, which frequently leads to serious or fatal injuries.
c. Severe Vehicle Damage: The forces involved in a high-speed collision with a rigid pole result in extensive, often "write-off," damage to the vehicle.
d. Infrastructure Disruption: A damaged utility pole can lead to widespread power outages and communication network disruptions.
e. Downed Live Wires: If the pole does break or the lines snap, live electrical wires can fall onto the roadway or surrounding areas, posing a high risk of electrocution and potentially starting fires.
f. Traffic Congestion and Secondary Accidents: The initial collision and subsequent hazards often require road closures, leading to significant traffic disruption and the potential for secondary collisions if the scene is not secured quickly.
g. Risk to First Responders: Emergency personnel face added risks from potential electrical hazards when attending the scene of a collision involving utility poles.

44) Through the RSA process this issue is likely to be identified and the concept layout plans presented with the application will, through the engineering approvals process, will develop into detailed engineering designs amended to address RSA recommendations and comply with current design requirements. These design requirements are specified in Councils Infrastructure Design Standards and NZTA's Specifications for Lighting Columns and Light Design[6] .

[6] NZTA SP/SM26:2012 120712 Specification for Lighting Columns & M30 Specification and Guidelines for Road Lighting Design

45) Further, permissions to attach lighting to the existing power poles would need to be obtained from Orion whose own Network Connection Standards[7] that recommend undergrounding as an alternative to overhead lines. In addition, future access arrangements as well as the likely disturbance and potential removal of the poles to enable construction of the road upgrade may also require that the existing poles cannot be retained.

46) Given Council's responsibility for the safety of road users and considering the need to design to Council, NZTA and Orion's own standards, I maintain that the power lines should be undergrounded and frangible lighting columns that comply with clear zone requirements be provided as required by current road design standards.

[7] Orion Infrastructure Management Standard NW70.00.15 - Network Connection Standards May 2023