



**aston**  
CONSULTANTS

*resource management & planning*

A PO Box 1435 Christchurch 8140 P 03 3322618 M 0275 332213

E [info@astonconsultants.co.nz](mailto:info@astonconsultants.co.nz) W [www.astonconsultants.co.nz](http://www.astonconsultants.co.nz)

1 April 2026

Re: Fast Track Approvals Act 2024  
Application: Ryans Road Industrial Development [FTAA-2504-1054]  
Applicant: Carter Group Limited  
Site address: 104 Ryans Road & 20 Grays Road, Christchurch

Comments by TWT Holdings Ltd on draft conditions pursuant to Section 70 of the Fast-track Approvals Act 2024.

TWT Holdings Ltd (TWT HL) makes the following comments:

### **Introductory comment**

This is a resource consent application which has strategic implications beyond the site. There are significant implications for the strategic transport network, and we draw the Panel's attention to Policies 6.3.4 and 6.3.5 of the Canterbury Regional Policy Statement and Objective 6 of the National Policy Statement – Urban Development (NPS-UD) (see **Attachment B**). We note that the transport assessment provided has confirmed the suitability of the adjoining road network for the vehicle movements anticipated and an integrated transport assessment (ITA) has been undertaken in support of the proposal. However, we understand from the draft decision that the potential effects of the development on the strategic road network (including cumulative effects) are still in contention between the main parties.

It is our understanding that the Christchurch City Council (CCC) is working on a proposed Area Plan to guide and help facilitate possible urban development between Russley and Pound Roads, south west of the Airport. This Fast Track application has potentially significant implications for the form and implementation of development within the Area Plan's boundary. This is particularly the case for the integration of land use, transport and other infrastructure.

We note further the caveat in the Applicant's ITA at 3.7.6 that the modelling only applies to the existing proposal (understandably). Nevertheless, under the RMA potential and cumulative effects are to be remedied or avoided. Such effects will be incremental as development gains momentum over time but at some stage will reach a point where mitigation is needed e.g. through intersection upgrades along Pound Road and SH 73.

**Property**

**Subdivision**

**Industry**

**Community**

**Environment**

As previously stated in earlier comments, we do not oppose the consent application in principle and see the proposed development has having significant economic benefits for the City, Greater Christchurch, and wider region. However, we share the Council's concern that traffic effects need to be monitored and that a staging rule is an appropriate method for managing uncertain future effects of the enabled development over time. Otherwise there is a risk that costs and delays associated with mitigation of downstream traffic effects will unfairly fall/be apportioned to other future development proposals in the vicinity, including by PRG Ltd, of which we are a member.

**Specific Comments on Conditions:**

CCC Conditions Part 2 Condition 3.

TWTHL is directly affected by any future performance and improvements to the Pound Road-Ryans Road intersection. We respectfully submit that the precautionary principle (discussed from [105] in the draft decision) be applied when imposing conditions to manage the effects of development on the local transport network, particularly the Ryans/ Pound Road intersection.

We assume the additional modelling undertaken would identify the approximate points in the future (thresholds) when successive intersection upgrading and mitigation could be needed. We therefore consider that the development should be staged accordingly.

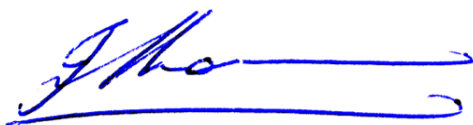
Our concern is that if the effects of the development are not monitored, future land owners could incur unfair costs for future upgrades, particularly in the absence of an appropriate development contributions policy or equitable cost sharing arrangements.

The staging condition as sought by the CCC is therefore supported with respect to intersection upgrades as one instrument for managing traffic effects.

CCC Part 2 Condition 81 Frontage Upgrades.

We seek confirmation and reassurance that the provisions made for berm and shoulder treatment in plan RC RD 32 attached to the Applicant's Ryans Road Plan set (Appendix A Updated Plans) will provide sufficient space to meet future frontage upgrades as per Council's specifications on the south side of Ryan's Road. An indicative cross section, showing the anticipated treatment of Ryans Road attached to a consent condition would provide the TWTHL comfort that sufficient road space will be provided for possible urban frontage upgrades that may be needed on the south side in the future. This will ensure an integrated approach to streetscape in the medium – long term if and when the south side gets developed (as is the intention of the Pound Road Group who are proposing GIZ of land at Pound Road/SH75 as shown on the map attached as **Appendix A)**

Yours sincerely



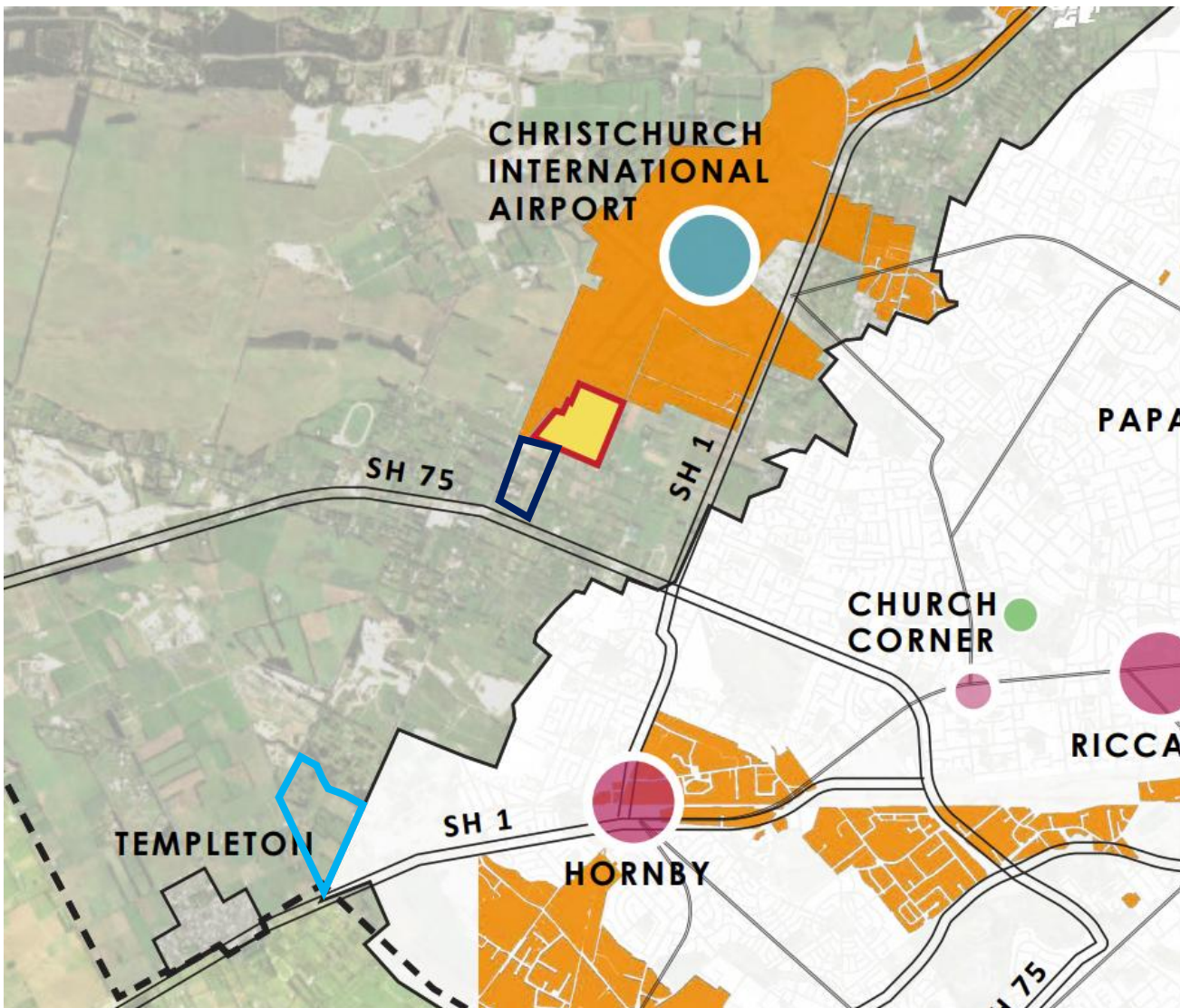
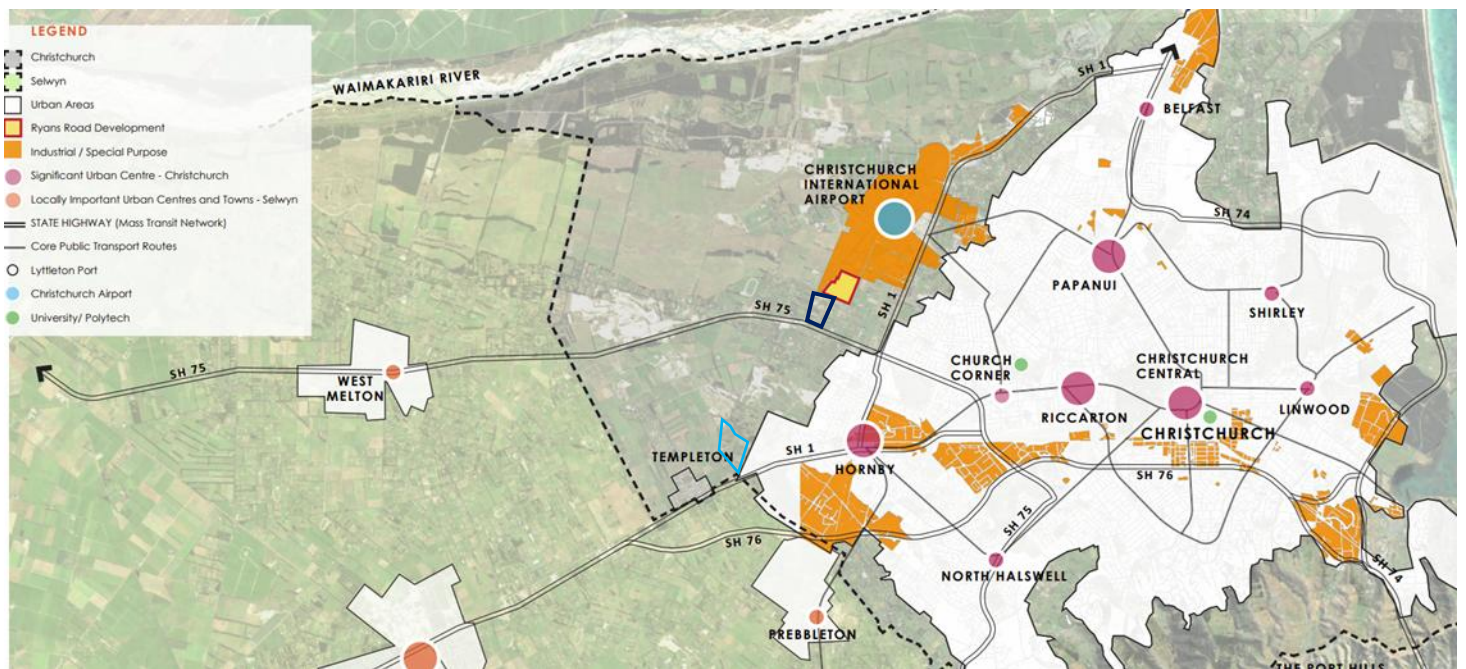
**IVAN THOMSON**

**Senior Planner**

**Appendix A:** Pound Road GI (General Industrial) rezoning proposals

**Attachment B:** Relevant Policies

**Attachment A: Greater Christchurch Context – Proposed GI zones (appx location)**



GIZ Ryans Road outlined in red; GIZ Pound Road/SH75 outlined in dark blue; GIZ Pound Rd/Barters Rd/Hasketts Rd outlined in light blue

## **Attachment B: Relevant Policies**

### National Policy Statement – Urban Development

Objective 6: Local authority decisions on urban development that affect urban environments are:

- a) integrated with infrastructure planning and funding decisions; and
- b) strategic over the medium term and long term; and
- c) responsive, particularly in relation to proposals that would supply significant development capacity.

### Canterbury Regional Policy Statement

#### 6.3.4 Transport effectiveness

Ensure that an efficient and effective transport network that supports business and residential recovery is restored, protected and enhanced so that it maintains and improves movement of people and goods around Greater Christchurch by:

1. avoiding development that will overload strategic freight routes;
2. providing patterns of development that optimise use of existing network capacity and ensuring that, where possible, new building projects support increased uptake of active and public transport, and provide opportunities for modal choice;
3. providing opportunities for travel demand management;
4. requiring integrated transport assessment for substantial developments; and
5. improving road user safety.

#### 6.3.5 Integration of land use and infrastructure

Recovery of Greater Christchurch is to be assisted by the integration of land use development with infrastructure by:

1. Identifying priority areas for development and Future Development Areas to enable reliable forward planning for infrastructure development and delivery;
2. Ensuring that the nature, timing and sequencing of new development are co-ordinated with the development, funding, implementation and operation of transport and other infrastructure in order to:
  - a. optimise the efficient and affordable provision of both the development and the infrastructure;
  - b. maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure;
  - c. protect investment in existing and planned infrastructure;
  - d. ensure that new commercial film or video production facilities are connected to reticulated water and wastewater systems; and

e. ensure new development does not occur until provision for appropriate infrastructure is in place;

3. Providing that the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained;

4. Only providing for new development that does not affect the efficient operation, use, development, appropriate upgrading and safety of existing strategic infrastructure, including by avoiding noise sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport, unless the activity is within an existing residentially zoned urban area, residential greenfield area identified for Kaiapoi, or residential greenfield priority area identified in Map A (page 6-28) and enabling commercial film or video production activities within the noise contours as a compatible use of this land; and

5. Managing the effects of land use activities on infrastructure, including avoiding activities that have the potential to limit the efficient and effective, provision, operation, maintenance or upgrade of strategic infrastructure and freight hubs.