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4 June 2026

Ryans Road Industrial
Development Expert Panel
Environmental Protection
Authority
Private Bag 63002
Wellington 6140
ATTN: Keely Paler

Tēnā koutou,

Comments on Minor Errors for Ryans Road Industrial Development

The Department of Conservation (DOC) has reviewed the Panel's decision of 7 May 2026 in relation to the Ryans Road Industrial Development Fast-track application.

DOC provides this correspondence in response to the request of the Environmental Protection Agency (EPA) to inform them of any minor errors as soon as possible. Please find the minor errors DOC has noted outlined below.

Nāku noa, nā

Jenni Fitzgerald
Fast Track Applications Manager

Wildlife Authority Suggested Corrections

Condition Number	Text with Track-changed Suggestion	Comments and Reasoning
17.	A report summarising the salvage and relocation results will be prepared and submitted to Christchurch City Council, Canterbury Regional Council, Whitiora, Mahaanui Kurataiao and DOC within 30 days from the completion of the salvage and relocation ~~date of the work~~ (see LMP attached at Appendix 1). Specifically, this report will include: a. Results of lizard salvage and relocation work. Should native lizards be found, then the following will also be included in the report: i. Photos of lizard salvage methods utilised; ii. Photos of lizards captured (including photos of the salvage and relocation areas); iii. A map showing the location of lizard upon capture and upon release; iv. The species and number of any lizards detected, captured, and released, and v. The results of all surveys and monitoring. b. Descriptions of how lizard management activities outlined in the LMP were followed, including conditions detailed in the WAA permit and associated resource consent conditions; c. An Amphibian and Reptile Distribution Scheme (ARDS) card detailing information relating to captured lizards (also to be provided to herpetofauna@doc.govt.nz); and, d. A brief summary regarding the outcomes of the LMP, including any improvements/changes that should be implemented in future.	Minor amendment to ensure clarity in referencing councils and to specify the trigger for the report. Minor amendment to formatting of bracket.

Canterbury Regional Council Consent Suggested Corrections

Condition Number	Text with Track-changed Suggestion	Comments and Reasoning
CRC254900 – s9 Land Use Consent		
6.	At least 15 working days prior to the commencement of works to remediate contaminated land, the Consent Holder must submit a RAP to Canterbury Regional Council, Attention: Compliance Manager for certification that it complies with the conditions a - f~~e~~ below. The RAP required under this condition must: a. Be prepared by a Suitably Qualified and Experienced Practitioner (SQEP) in contaminated land; b. Outline the proposed soil sampling procedure to identify the extent of contamination, including guidelines used to analyse samples; c. Detail a procedure for managing any discovery of contaminated soil or material; d. Describe the methodology for soil removal and how soil will be prevented from being entrained in stormwater; e. Outline where the contaminated soil will be disposed of; and f. Describe any validation sampling that will be undertaken.	Minor correction to include condition f in the conditions that the certification must comply with.
9.	The earthworks authorised under this resource consent must occur in accordance with an ESCP. The ESCP must: a. Include a map showing the location of all works; b. Include ~~D~~detailed plans showing the location of sediment control measures, on site catchment boundaries, and sources of run-off; c. Detail how best practicable measures are taken to minimise discharges of sediment-laden stormwater run-off beyond the boundaries of the site; i. Include drawings and specifications of designated sediment control measures, if these are not designed and installed in accordance with the Erosion and Sediment Control Toolbox for the Canterbury Region (ESCT);	These changes are recommended for clarity and enforceability.

	ii. Detail the methodology for stabilising the site entrance and exit points and any measures employed to prevent off-site tracking of sediment and other materials from the site; d. Include a confirmation that the erosion and sediment control devices have been sized appropriately in accordance with the ESCT; e. Include a programme of works, including a proposed timeframe for each stage of the works and the earthworks methodology; f. Detail the management of any stockpiled material; g. Detail inspection and maintenance of the sediment control measures; h. Detail sampling procedures and protocols; i. Define the discharge points where stormwater is discharged onto land / infiltrates into land; j. Include a description of dust mitigation to be used and details of best practicable options to be applied to mitigate dust and sediment discharge beyond the site boundary; k. Detail the methodology for stabilising the site if works are paused for more than five working days or abandoned; l. Detail the methodology for stabilising the site and appropriate decommissioning of all erosion and sediment control measures after works have been completed; and m. Include measures such as a Chemical Treatment Plan should the use of water treatment chemicals be required. ***Advice Note:*** *The use of Water treatment chemicals may require additional consent under section 15 of the Resource Management Act.*	
CRC254898 – s15 Discharge Permit – Construction Phase		
1.	The discharges authorised under this resource consent are limited to: a. The discharge of surface water to the lateral channel of the Paparua Water Race Network at 104 Ryans Road and 20 Grays Road legally described as, Pt Lot 3 DP 22679, Lot 4 DP 22679 and Pt Lot 1 DP 2837 associated with the non-consumptive take and use authorised by resource consent CRC254897 as shown in Plan CRC254898A. b. Sediment-	These changes are recommended for clarity and enforceability.

	laden stormwater from exposed areas during earthworks to land via temporary soak pits within the site at 104 Ryans Road and 20 Grays Road legally described as, Pt Lot 3 DP 22679, Lot 4 DP 22679 and Pt Lot 1 DP 2837 as shown in Plan CRC254898B. Note: Plans attached at end of conditions. b. The discharge of ~~S~~sediment-laden stormwater from exposed areas during earthworks to land via temporary soak pits within the site at 104 Ryans Road and 20 Grays Road legally described as, Pt Lot 3 DP 22679, Lot 4 DP 22679 and Pt Lot 1 DP 2837 as shown in Plan CRC254898B.	
7.	The ESCP must: a. Include a map showing the location of all works; b. Include ~~D~~detailed plans showing the location of sediment control measures, on site catchment boundaries, and sources of run-off; c. Detail how best practicable measures are taken to minimise discharges of sediment-laden stormwater run-off beyond the boundaries of the site; i. Include drawings and specifications of designated sediment control measures, if these are not designed and installed in accordance with the ESCT; ii. Detail the methodology for stabilising the site entrance and exit points and any measures employed to prevent off-site tracking of sediment and other materials from the site; d. Include a confirmation that the erosion and sediment control devices have been sized appropriately in accordance with the ESCT; e. Include a programme of works, including a proposed timeframe for each stage of the works and the earthworks methodology; f. Detail the management of any stockpiled material; g. Detail inspection and maintenance of the sediment control measures; h. Detail sampling procedures and protocols; i. Define the discharge points where stormwater is discharged onto land / infiltrates into land;	These changes are recommended for clarity and enforceability.

	j. Include a description of dust mitigation to be used and details of best practicable options to be applied to mitigate dust and sediment discharge beyond the site boundary; k. Detail the methodology for stabilising the site if works are paused for more than five working days or abandoned; l. Detail the methodology for stabilising the site and appropriate decommissioning of all erosion and sediment control measures after works have been completed; and m. Include measures such as a Chemical Treatment Plan should the use of water treatment chemicals be required. ***Advice Note:*** *The use of Water treatment chemicals may require additional consent under section 15 of the Resource Management Act*	
13.	a. For the purposes of observing compliance with Condition (12)(a)(iv) of this resource consent, monitoring of the Paparua Water Race Network of each direct discharge into the Paparua Water Race network or where a discharge emanates into the Paparua Water Race Network must occur using a recognised method to measure visual clarity. b. The monitoring must be carried out at locations: i. 10 metres upstream of the (most upstream) discharge location; and ii. 20 metres downstream of each discharge location. c. The monitoring must be carried out at a frequency of: i. At least twice per day when discharges occur via pumping; and ii. When practicable during or immediately following a rainfall event when either the intensity is equal to or greater than five millimetres per hour or 10 millimetres or greater rainfall depth occurs in a 24-hour period. d. Records of the monitoring must be kept and provided to the Canterbury Regional Council on request.	Minor amendment to ensure correct reference to condition numbers.

	e. Advising any observed non-compliance with Condition (12)(a)(iv) to the Canterbury Regional Council, Attention: Compliance Manager, with two working days, and advising of the actions taken and measures to be undertaken to prevent a recurrence. **Advice note:** Water clarity can be measured using a Stream Health Monitoring and Assessment Kit (SHMAK) clarity tube, a Secchi Disk, or a Nephelometer provided a site-specific relationship has been established between the Nephelometer Turbidity Units (NTU) and the soils and site specific conditions at the consented location.	

Christchurch City Council Consent Suggested Corrections

Condition Number	Text with Track-changed Suggestion	Comments and Reasoning
CCC s9(3) RMA Land Use Consent		
9.	DOC recommends that condition 9 is altered to 9B to reflect the references throughout the other conditions and the existence of condition 9A.	
CCC s11 RMA Subdivision Consent		
23.	a. The draft Earthworks and Construction Management Plans provided with the application are accepted in principle. Prior to construction these will be incorporated into an Environmental Management Plan (EMP) as required in Condition (26) below, for the site and submitted to Council for reference. All filling and excavation work must be carried out in accordance with the EMP which identifies how the environmental risks of the project will be managed. b. Except where approved as part of a separate Environment Canterbury (CRC) resource consent for stormwater discharge or CRC resource consent for excavation/filling, work must not commence until the Christchurch City Council's Subdivision Engineer (via email to rcmon@ccc.govt.nz) has formally accepted the EMP.	Minor amendment to formatting.

62.	Treated stormwater and stormwater in excess of the first flush treatment system capacity generated within **public roads** shall discharge into a rapid soakage disposal system. The rapid soakage system shall: a. Consist of infiltration soak pits or trenches designed in general accordance with WWDG Part 6.5, and; b. Provide sufficient storage and soakage to dispose of stormwater generated from the critical two percent annual exceedance probability storm event. c. Provide an array of redundant "capped off" rapid soakage chambers or trenches providing at least double the design soakage capacity.	Minor amendment to formatting.
77.	The consent holder shall operate all stormwater infrastructure to vest into Council for the below engineering defects periods: a. The engineering defects period for the stormwater treatment and infiltration systems is 2 years (24 months) from Practical Completion Certificate. b. The engineering defects period for all other stormwater infrastructure is 24 months following the issue of the Section 224(c) certificate.	Minor amendment to formatting.
106.	A Fish Management Plan shall be prepared by a suitably qualified freshwater ecologist and submitted to Council's Waterways Ecologist Planner the for their records by way of email to rcmon@ccc.govt.nz at least 10 working days before installation of the culverts begins. The plan should include the following as a minimum: a. Locations where the plan will be implemented; b. Methods to ensure fish cannot access works areas; c. Protocols to be followed including methods to rescue and relocate fish; d. Person/s responsible ensuring the plan is implemented;	Minor amendment to formatting.

	e. Protocols if pest fish are encountered; f. Protocols to ensure fish are not entrained in pumps during pumping (water pumping should have fish screens with a maximum mesh width and height size of three millimetres).	
107.	In the event that fish are required to be salvaged and relocated to an appropriate waterway. The fish salvage must include the following measures: a. Be conducted by or under supervision of a certified, suitably qualified and experienced Freshwater Ecologist; b. Be in general accordance with Canterbury Regional Council and Christchurch City Council's "Fish Salvage Guidance for Works in Waterways" (12 October 2017) and the Ministry for the Environment's "National works in waterways guideline" (2021); c. The fish must be relocated to a habitat deemed suitable by the certified, suitably qualified and experienced Freshwater Ecologist after consultation with appropriate experts from the Ministry for Primary Industries, the Department of Conservation, and Fish and Game; d. The certified, suitably qualified and experienced freshwater ecologist must hold any necessary permits and approvals required by the Ministry for Primary Industries, Department of Conservation and Fish and Game to conduct fish salvage.	Minor amendment to formatting.
109.	Prior to any development works commencing on the application site, the 'Draft Wildlife Hazard Management Plan' ~~(WHMP)~~ prepared by PDP and submitted with the application must be finalised by the Consent Holders suitably qualified Ecologist specialising in Avifauna, for certification by CCC under Condition 110 below. The final Wildlife Hazard Management Plan (WHMP) shall cover bird strike hazards during both the construction stage and the operational phase (for the lifetime for the development) to address the ongoing management and monitoring of bird strike risk at 104 Ryans Road	Minor amendment to remove potential point of confusion around the acronym WHMP referring to the draft Wildlife Hazard Management Plan not the (assumed intended) final Wildlife Hazard Management Plan. Minor amendment to correct spelling error and to formatting.

	and 20 Grays Road to ensure that the development will not increase the existing level of bird strike risk at Christchurch International Airport. a. The final WHMP must be prepared: i. Giving consideration to consistency with the Christchurch International Airport Limited (CIAL) WHMP to detail management methods to help reduce bird strike risk associated with the site and CIAL airport operations; and ii. Giving CIAL and in particular their suitably qualified Ecologist specialising in Avifauna and Wildlife Manager an opportunity to participate in further consultation with the Consent Holders suitably qualified Ecologist / Avifauna expert. If CIAL does not provide a response to the WHMP within 20 working days of receiving it, the consultation will be deemed as satisfied. Evidence of this consultation (or the opportunity provided to do so) is to be submitted to CCC with the certification. b. Specifically, for the construction phase the final WHMP must include as a minimum: i. Pre-development mitigation measures (e.g., mowing site grass to disperse birds in a southward direction away from the CIAL flight path). ii. Passive and active management methods including, surveillance and monitoring, grounds management specifications (i.e., recommended grass heights to deter high-risk species), and seasonal bird counts (this could be completed by CIAL and/or site surveillance personnel). iii. Management of earthworks including location and size of stockpiles, seasonal timing of earthworks, size of areas being earth worked or depressions in the ground that may result in ponding water. iv. Landscape design standards to avoid bird attracting plant and grass species. v. Communication plan of development timelines with CIAL before development works take place to mitigate potential avifauna issues and offer support if any issues arise. vi. Appointment of a Site Manager responsible for ~~implanmnting~~ implementing the WHMP and provision of their contact details to CIAL.	

	vii. Roles and responsibilities - including liaising with external stakeholders (e.g., CIAL) to determine the obligations of respective organisations and their personnel. viii. Monitoring and review procedures of WHMP, including liaison with CIAL with increases in bird numbers onsite being communicated so appropriate counter-measures can be implemented. c. Specifically, the WHMP for the operational phase must include as a minimum: i. On going roles and responsibilities for the lifetime of the development - including liaising with external stakeholders (e.g., CIAL) to determine the obligations of respective organisations and their personnel. ii. Passive and active management methods – surveillance and monitoring, grounds management specifications (i.e., recommended grass heights to deter high-risk species), and seasonal bird counts (this could be completed by CIAL and/or site surveillance personnel). iii. Landscape design standards and mitigations to avoid bird attracting plant and grass species. iv. Waste and pest management procedures for lots/ activities. v. Mitigation options in relation to flat roof buildings and roosting/ nesting in building rafters. vi. Lighting designed not to attract insects which are a food source for birds. vii. Monitoring and review procedures of WHMP – this must include liaison with CIAL with increases in bird numbers onsite being communicated so appropriate counter-measures can be implemented. viii. In addition to monitoring by the site manager, annual bird counts conducted by an avian ecologist for 5 years following development is necessary to monitor the impacts of management measures in place.	