



Te Kāwanatanga o Aotearoa
New Zealand Government

Your Comment on the Pound Road Industrial Development project application

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email at substantive@fastrack.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)	Department of Conservation		
First name	Asher		
Last name	Cook		
Postal address	PO Box 10420, Wellington 6140		
Mobile phone		Work phone	
Email			

2. We will email you draft conditions of consent for your comment			
X	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

3. Please provide your comments on this application
Please find comments attached

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.



Jenni Fitzgerald
Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 04/11/2025

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Comments on a fast-track consenting application

Fast-track Approvals Act 2024 section 53

To: The Expert Panel

From: Department of Conservation

Regarding fast-track project: Pound Road Industrial Development

Fast track Reference: FTAA-2505-1057

1 Background

- 1.1 NTP Development Holdings Limited (the Applicant) is seeking approvals associated with the subdivision of land and the development of 74 freehold industrial lots, with infrastructure such as roads, three-waters utilities and landscaping, at a site northwest of Pound Road, Christchurch.
- 1.2 There is no Public Conservation Land within or adjacent to the proposal site.
- 1.3 The Department of Conservation (the Department) was approached for pre-lodgement consultation prior to the Applicant lodging its substantive application, specifically in relation to Wildlife Act aspects of the development. In summary:
 - The Applicant provided a draft Lizard Management Plan (LMP) on 9 July 2025
 - The Department provided the Applicant with feedback on the draft LMP. A summary of that feedback is provided in the Department's report under Section 51 of the Act.
- 1.4 The Department has already provided a report under section 51 of the Act in relation to wildlife approval for the salvage of lizards that are absolutely protected under the Wildlife Act 1953. The activity of salvage includes the capture, handling, release and incidental killing of wildlife.
- 1.5 In accordance with sections 53(2)(k), 53(2)(m)(i), and 53(2)(m)(iv) of the Fast-track Approvals Act (FTAA / the Act), the Director-General of Conservation (D-G) has been invited to comment on the substantive application. Statutory delegations are in place for the Department of Conservation (DOC / the Department) to provide commentary on behalf of the D-G.

2 Department of Conservation advice



Department of
Conservation
Te Papa Atawhai

- 2.1 Overall, the Department recommends making amendments to the proposed consent conditions to ensure management plans have clear outcomes, objectives, information requirements and certification processes. Minor amendments are also recommended to ensure conditions refer to the correct versions of plans and include specific reference to lizard habitat enhancement and remediation requirements.
- 2.2 The Department has not assessed the proposal against the relevant statutory framework. Comments are limited to the proposed ecology conditions.

3 Comments on conditions

- 3.1 On 5 October 2025 the Applicant provided additional updated documents including updated sets of proposed Christchurch City Council and Canterbury Regional Council consent conditions.
- 3.2 The Department has provided preliminary comments on those updated consent conditions that, if adopted, may help ensure that the adverse effects on the environment are adequately addressed.
- 3.3 Suggested additions to the Applicant's proposed conditions are shown as underlined and deletions with ~~strike through~~.

Bird Management

- 3.4 The Department recommends that amendments are made to the proposed Christchurch City Council Subdivision Conditions to ensure the Bird Management Plan includes a clear objective and more detailed requirements for the preparation and certification of the plan. An additional amendment is recommended to reflect the recommendation, in the Wildland's Assessment of Ecological Effects, that as much construction work as possible should occur outside the bird breeding season.

Condition 13.1 should be amended as follows:

As far as practicable, development works should occur outside of the bird breeding and nesting season. Works within the bird breeding and nesting seasons (mid-August to mid-February annually) must comply with the an-accepted Bird Management Plan. The objective of the Bird Management Plan is to avoid, or otherwise minimise adverse effects on any Threatened or At-Risk indigenous bird species found to be within or adjacent to the development footprint. Including but not limited to South Island Pied Oystercatcher, Red-billed Gull, or Banded Dotterel. The Bird Management Plan must be prepared by a suitably qualified and experienced ecologist/ornithologist.

Condition 13.2 should be amended as follows:

The Bird Management Plan required by Condition 13.1 must be submitted to the Subdivision Engineer (via email to rcmon@ccc.govt.nz), at least 15 working days before works commence, for certification by Council's Ornithologist. The Council's Ornithologist may certify the Bird Management Plan if satisfied that it achieves the objective in condition 13.1, is consistent with the conditions of this resource consent, and has been prepared by a suitably qualified and experienced ecologist/ornithologist. No works are to commence on site until the Bird Management Plan has been certified by the Council's Ornithologist, ~~except that if acceptance is not achieved within 15 working days it will be deemed to have been received. A Bird Management Plan must be prepared by a suitably qualified and experienced professional.~~

Note: ~~the applicant's appointed ornithologist will undertake a survey of birds protected by the Wildlife Act and report back within 4 working days prior to the commencement of any site works.~~ Works include earthworks and cutting/removal of vegetation.

Condition 13.3 should be amended as follows:

1. *A To achieve the objective in Condition 13.1, the Bird Management Plan must include, but is not limited to:*
 - a. *A description of preconstruction bird survey methods, which must be undertaken no more than eight days prior to the commencement of works or prior to the recommencement of works in circumstances where works have ceased for more than eight days.*
 - b. *A description of measures required to avoid disturbance of any nests identified during preconstruction surveys, including minimum setback requirements.*
 - c. *A description of measures required to limit the risk of bird re-occupation of disturbed areas prior to nesting.*
 - d. *Accidental discovery protocols if bird nests/ habitats are found after works have commenced.*
2. *The bird management plan must not use noise devices for deterrence of birds.*

Note: the Bird Management Plan will be reviewed by Council's ornithologist during the ~~acceptance~~ certification stage. It is an offence to ~~disturb~~ harass protected wildlife under the Wildlife Act 1953 without lawful authority. ~~The bird management plan must not use noise devices as part of the deterrence works.~~

Condition 13.4 should be amended as follows:

~~Further actions must be implemented if identified in the Bird Survey performed within 8 working days of works commencing. No more than eight working days prior to commencing works, the Consent Holder's appointed ornithologist must undertake a bird survey to identify the presence of any birds on site. A summary of the survey findings must be provided to council. If the survey identifies the presence of any species of birds protected under the Wildlife Act, measures must be implemented, in accordance with the certified Bird Management Plan, to avoid disturbance of any active nests on site.~~

Fish Protection

- 3.5 The Department recommends that amendments are made to the proposed Canterbury Regional Council Land Use Consent conditions to ensure the Fish Management Plan has a clear objective and that certification by Council is required to confirm the plan is consistent with the objective and the conditions of the consent.

Condition 23 should be amended as follows:

~~Prior to works commencing, a~~ A Fish Management Plan must be prepared by a suitably qualified freshwater ecologist. The objective of the plan is to avoid harm to fish when undertaking instream works. The plan must be ~~and~~ submitted to the Canterbury Regional Council ~~for their records (via ecinfo@ecan.govt.nz) for certification that it complies with the conditions of this consent and will achieve the objective of avoiding harm to fish when undertaking instream works.~~

The plan should include the following as a minimum:

- a. Locations where the plan will be implemented;
- b. Methods to ensure fish are not present in areas where works are being undertaken;
- c. Protocols to be followed including methods to rescue and relocate fish;
- d. Person/s responsible ensuring the plan is implemented;
- e. Protocols if pest fish are encountered;
- f. Protocols to ensure fish are not entrained in pumps during pumping (water pumping systems ~~should~~ must have fish screens with a maximum mesh width and height size of three millimetres).

Condition 24 should be amended as follows:

~~In the event that fish are required to be salvaged and relocated to an appropriate waterway, fish salvage must;~~

- 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)¹ and the Ministry for the Environment's "National works in waterways guideline" (2021)².*
- 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.*

Lizard Management

- 3.6 On 8 October 2025 the Applicant provided the Department with a revised Lizard Management Plan ("the revised LMP"), dated October 2025. Compared to the LMP lodged with the application, the revised LMP provides information on timing of lizard salvage and proposes new release sites that have long-term protection.
- 3.7 Having reviewed the revised LMP, the Department is supportive of the proposed enhancement of lizard habitat at the new release sites and 0.41 hectares of remediation planting to be undertaken at the development site, concluding that over time they will result in an overall increase in the quality and quantity of lizard habitat. However, it is recommended that amendments are made to the proposed Christchurch City Council Subdivision Consent Conditions to ensure they include specific reference to lizard habitat enhancement and remediation requirements.
- 3.8 The Lizard Relocation Habitat Landscape Design attached to the LMP as Appendix 2 requires updating so that it relates to Kōwhai Grove rather than the previously proposed release site of Templeton Golf Club. The Department recommends that the panel requests a final LMP with a lizard relocation habitat design which has been updated since the change in release sites.

Condition 12 should be amended as follows:

Terrestrial Ecology

¹ Burrell G, Gray D. 2017. *Fish salvage guidance for works in waterways*. Prepared for Environment Canterbury Regional Council and Christchurch City Council. Christchurch: Canterbury Regional Council and Christchurch City Council.

² Ministry for the Environment. 2021. *National works in waterways guideline*. Prepared for the Ministry for the Environment by Boffa Miskell Limited. Wellington, New Zealand: Ministry for the Environment. <https://environment.govt.nz/assets/publications/works-in-waterways-guideline.pdf>.

All work affecting lizards, including capture and relocation, must comply with the Wildlife Approval obtained through this application, or any subsequent variation to that authority and the Lizard Management Plan, dated [insert date of final LMP] (or any subsequent version updated by variation in accordance with Clause 7 of Schedule 7 of the Fast-track Approvals Act 2024). ~~attached as Appendix 8 to the application, and the permit obtained by this application under the authority of the Wildlife Act (1953).~~

All works relating to the replacement and enhancement of lizard habitat, including the establishment of approximately 4,085 m² of buffer amenity planting along the Barbers Road frontage of the proposal site, the undertaking of rabbit and hare control (including the construction of a rabbit-proof fence) at Weedons Ross Road release site, and the enhancement and maintenance of the Kōwhai Grove release site (including the timings, planting schedules, and rock stack pile specifications), must occur in accordance with the approval obtained through this application). (or any subsequent version updated by variation in accordance with Clause 7 of Schedule 7 of the Fast-track Approvals Act 2024)..

4 Conclusion

- 4.1 The Department considers that any outstanding concerns can be addressed through the adoption of the amended conditions above, or those to similar effect.
- 4.2 Thank you for the opportunity to comment.