

# MEMORANDUM OF THE NEW ZEALAND TRANSPORT AGENCY WAKA KOTAHI ON THE RYANS ROAD INDUSTRIAL DEVELOPMENT [FTAA- 2504-1054]

## Comments on the Draft Conditions

02 April 2026

### Introduction

1. This memorandum provides comments from the New Zealand Transport Agency Waka Kotahi (**NZTA**) on the Draft Conditions, released 26 March 2026 along with the Draft Expert Panel Decision (**the Draft Decision**), for the Ryans Road Industrial Development (**Application**), submitted by Carter Group Limited (**the Applicant**) under the Fast Track Approvals Act 2024 (**FTAA**), application reference FTA-2504-1054.
2. NZTA appreciates the opportunity to comment on the Draft Conditions pursuant to section 70 of the FTAA.

### Comments on the Draft Conditions under FTAA section 70

3. Appendix 1 (attached to this memo) contains the Draft Condition relevant to NZTA with suggested amendments recorded and associated explanations as comments. The relevant condition is Part 2: Christchurch City Council Subdivision Consent Conditions, Condition 3 (**the Condition**). The rationale for the proposed changes is outlined below.

### Development Impacts

4. The Draft Decision notes that the SH1 / SH73 intersection is over-capacity in 2024 and 2038 without the development traffic.<sup>1</sup> The development related traffic added to the 2038 model exacerbates these issues, but not significantly and the reasonably low scale deterioration in operation as a result of the proposed development is acceptable in the context of current NZTA planning for an upgrade of that intersection. The operation of the intersection would be improved with changes to the line-marking on the Pound Road north and south approaches. While NZTA agrees that SH1 / SH73 intersection is over-capacity in 2024 and 2038, even without the development traffic added to the surrounding road network, there is no upgrade ~~is~~ currently funded in the National Land Transport Plan 2024-2027, and therefore no confirmed timeframe on when this upgrade may be completed.
5. Furthermore, the Draft Decision also notes that the SH73 / Pound Road intersection is over-capacity in the 2038 PM peak without the development in place and remains over-capacity when adding the development generated traffic to the network. The Draft Decision notes that significant volumes of traffic currently use Pound Road as an alternative route to SH1, due to congestion at the SH1/SH73

---

<sup>1</sup> FTA-2054-1054, Expert Panel, Draft Decision, dated 26 March 2026, Para 429.

intersection. NZTA remains concerned that with additional traffic generated by the development travelling on Pound Road there will lead to increased delays at the SH73/Pound Road roundabout.

6. In addition, the SH1 / Ryans Road intersection is a left in left out (LILO) arrangement designed for low volume traffic, primarily light vehicles. NZTA remain concerned that the development will generate more vehicles through the SH1 / Ryans Road intersection, and that, without a slip lane for traffic to enter SH1, this would cause longer queues at this intersection.
7. The final intersection that should be considered is the George Bellow/SH1 intersection. NZTA considers this is the most suitable access for vehicles generated by the development, as it is designed for heavy vehicles, and has suitable access for southbound and northbound traffic.
8. The Draft Decision acknowledges that NZTA identified that the development will have an impact on four state highway intersections: SH73 / Pound Road, SH1 / SH73, SH1 / Ryans Road, and the George Bellow/SH1 intersection. NZTA remains concerned that, without appropriate mitigation identified in the Draft Conditions, the development will generate adverse impacts on the neighbouring intersections.
9. NZTA provided a suite of conditions in the response to Minute 6 dated 18 December 2025 to address potential adverse transport impacts on the neighbouring intersections.
10. The Draft Conditions issued did not include NZTA's proposed conditions as explained in the Draft Decision: *"NZTA suggested new transportation conditions 1-8 together with an explanation regarding each condition. The CCC land use consent and subdivision consent conditions are largely agreed as between CCC and NZTA except for a relatively small number of matters where there remains dispute between the Applicant and CCC and NZTA. None of these matters would prevent the grant of consent".*<sup>2</sup>
11. NZTA considers that the approach of considering the performance of individual intersections in isolation, overlooks the wider network impacts caused by the additional traffic generated by the proposed development. The lack of improvements at a neighbouring intersection can hold traffic back or creates diversions across the network as vehicles seeks to avoid congested intersection. The Level of Service of individual intersections is an indication of available capacity against traffic movement demands. Depending on where traffic is coming from and to, certain intersections will have a higher demand for movements than others. The full impact on the wider network is therefore not being captured, and mitigated accordingly, by focussing on the performance of individual intersections.
12. As a result, NZTA considers that the Condition should require that Stage 3 of the development should not occur until the modelling is updated to consider the wider impact on the four neighbouring intersections being the intersection of SH73 / Pound Road, the intersection of SH1/SH73, the intersection of SH1 / Ryans Road, and the George Bellow/SH1 intersection.

## **Conclusion**

13. NZTA considers that the Ryans Road Industrial Development generates adverse impacts on the state highway network that require mitigation. For this reason, NZTA considers that to manage the impacts, controls through appropriately worded conditions are required to align the development with the implementation of the necessary intersection modelling and if required, upgrade of relevant infrastructure.

---

<sup>2</sup> FTA-2054-1054, Expert Panel, Draft Decision, dated 26 March 2026, Para 62(b).

**Appendix 1**

**Comments and changes proposed to Draft Condition 3**

	Draft Condition	NZTA Rationale
3.	<p><b>Staging</b></p> <p>The subdivision must be staged, comprising:</p> <ol style="list-style-type: none"> <li>1. Roading and services, Ryans Road (including naturalisation of the Paparua Water Race) and Grays Road upgrades, and Lot 200 and Lot 201 stormwater treatment facilities.</li> <li>2. Creation of legal title and release of 50% of the lots;</li> <li>3. Creation of legal title and release of the balance of the lots.</li> </ol> <p>Stage 3 must not occur until <del>either</del>:</p> <ol style="list-style-type: none"> <li>a. The intersection of Pound Road/ Ryans Road is upgraded to the satisfaction of CCC; <del>or</del> <u>and</u></li> <li>b. Modelling has been updated and demonstrated to the satisfaction of Council that the intersections <u>being SH1/Ryans Road, Pound Road/SH73, George Bellow/SH1 and SH73/SH1</u> can safely accommodate the additional traffic generated by occupier lots within the development. The second stage must not occur where the updated model demonstrates the average queue length associated with right turns into Ryans Road extends beyond the available stacking space for</li> </ol>	<p>Stage 3 is not to occur until both the upgrade of the Pound Road/ Ryans Road intersection has been completed, and modelling is updated to consider the wider impact on the four neighbouring intersections being SH1/Ryans Road, Pound Road/SH73, George Bellow/SH1 and SH73/SH1.</p> <p>This modelling is required to determine if the traffic network can safely accommodate the additional traffic generated by occupier lots within the development of Stage 3.</p>

the modelled period. This modelling shall be based on an agreed annual turning movement survey of the intersection arranged by the consent holder and provided to Council for input into the agreed model.

At each stage any balance land is to be left as a fully serviced allotment.