

4 November 2025

Environmental Protection Authority
Private Bag 63002
Waterloo Quay
Wellington 6140

Attn: Melita Raravula

Dear Melita

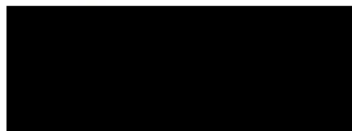
**ARA POUTAMA AOTEAROA THE DEPARTMENT OF CORRECTIONS – COMMENTS ON NPT
DEVELOPMENT HOLDINGS PROPOSAL – FTAA-2025-1057**

On behalf of Ara Poutama Aotearoa (the Department of Corrections) I thank you for the opportunity to provide comments on the Fast Track proposal lodged by NPT Development Holdings Ltd.

Please find attached comments in the prescribed form.

The Minister of Corrections has delegated authority to provide comments on Fast Track Applications to certain roles within the Department, including the Manager, Resource Management & Land Management.

Yours faithfully



Andrea Millar
Manager, Resource Management & Land Management

Enclosed: **Feedback form**

Your Comment on the Pound Road Industrial Development

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.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): Ara Poutama – Department of Corrections

First name: Andrea

Last name: Millar

Postal address: Department of Corrections, PO Box 1206, Wellington 6140

Home phone / Mobile phone

Work phone

Email:

2. We will email you draft conditions of consent for your comment



I can receive
emails and my
email address is
correct



I cannot receive
emails and my
postal address is
correct

Please provide your comments below, include additional pages as needed.

FTAA 2025-1057 NTP Development Holdings Limited

Ara Poutama – The Department of Corrections occupies 805ha of Crown Land that is adjacent to the NTP Development Holdings Limited property. There are two operational prisons and a mixed livestock and cropping farm on the Corrections property. The farm operation includes an extensive free farm piggery, sheep and beef rearing plus cropping.

The piggery utilises eco-barns and enclosures for rearing pigs for meat production, this operation produces a significant volume of bedding material which is composted before spreading onto land prior to planting crops. The piggery and compost spreading operations can result in the release of odour that could be detected beyond the boundary of the Corrections property.

The farming operations undertaken by Corrections are lawfully established and hold current resource consents which are being complied with. These resource consents

authorise a large-scale pig rearing operation and the spreading of composted bedding material and liquid waste onto land.

The Department relies upon the farming operations as a training and rehabilitation tool for offenders who are serving custodial sentences to gain farming skills which will provide them with new career opportunities upon their release.

The application by NTP Development Holdings Limited is for a subdivision and seeks to impose conditions on future land uses in the form of “framework conditions”. Anticipated industrial activities include dry industrial uses (with low water/wastewater use requirements), light manufacturing, warehouse and logistics businesses. Specifically excluded from the application by way of these conditions are residential activities, residential units and visitor accommodation (paragraph 107 of the substantive application), despite there being no enforceable mechanism offered in the application to impose such land use controls.

Within this wide scope of potential future land uses sought in the application, there may be the risk that future land uses establish of a type that are sensitive to the effects of the lawfully established farming operations on The Department’s land, with odour being a particular concern.

For this reason, the Department requests that the Expert Panel take into account the risk of reverse sensitivity when considering the application by NTP Development Holdings Limited, particularly given the potentially wide (and not well defined) scope of future uses that may be enabled.

The Department’s concerns would be met by a condition which:

Require ‘no-complaints covenants’ on the new titles created in favour of the Department’s land legally described as Section 2 SO 454498, Section 3 SO 454496, Section 4 SO 19454 and Section 5 SO 423821. This should be a restrictive covenant registered on the new title to the property, in favour of the adjoining prison property (and binding any successors in title) not to complain as to effects generated by the lawful establishment and operation of the farming activity. Or an alternative condition that addresses this matter.