Ministry for Cities, Environment, Regions & Transport

FTAA-2607-1269: Application received for referral of the project under the Fast-track Approvals Act 2024 – Stage 2 decisions

Project Name: Whiterock Quarry and Managed Fill Development

Date submitted	22 October 2026	**Tracking**	26-BRF-02761
Security level	In-Confidence	**Priority**	Urgent

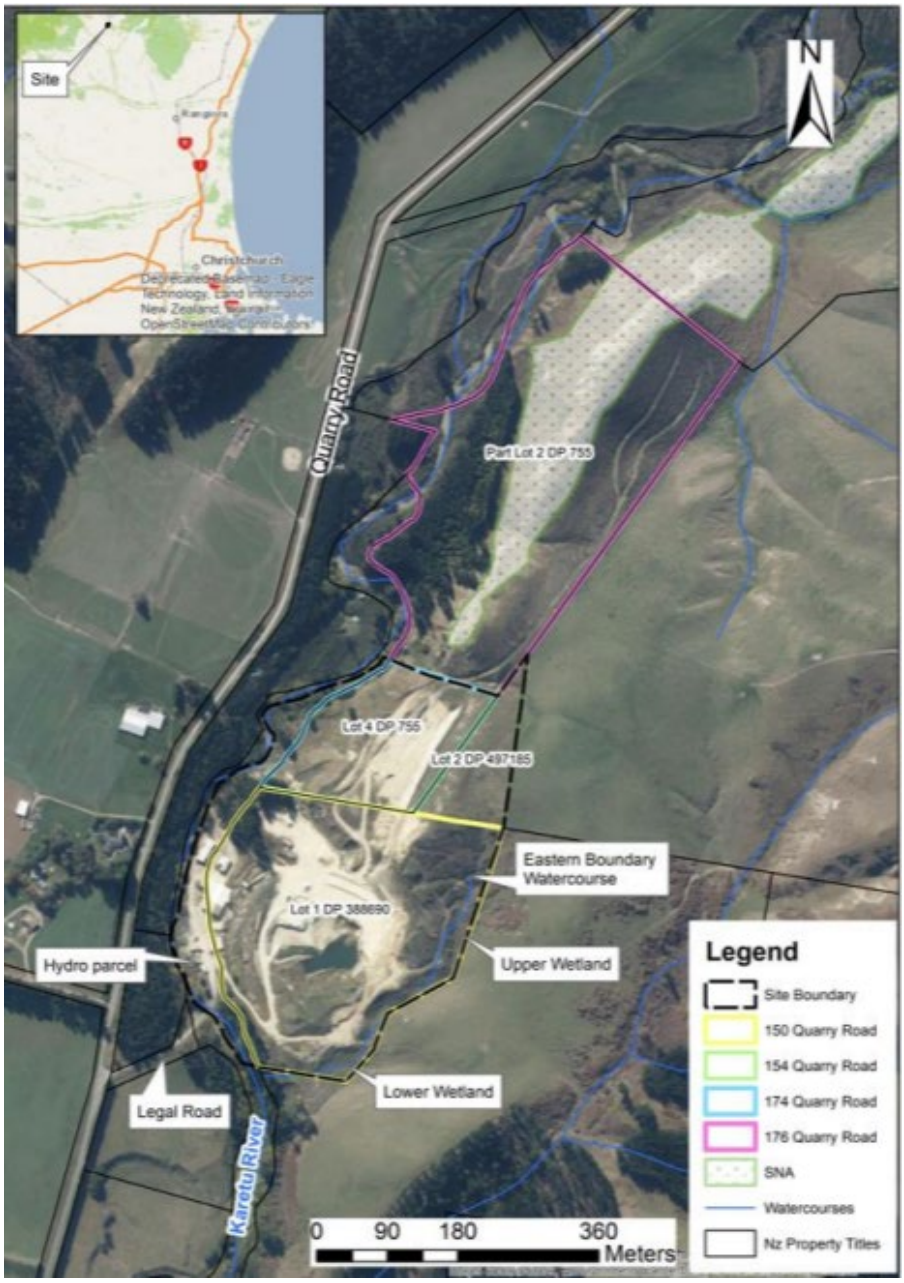
To	Action sought	Response by
Hon Chris Bishop **Minister for Infrastructure**	Decisions on recommendations	30 October 2026

Actions for Minister's Office staff	**Return** the signed briefing to the Ministry for Cities, Environment, Regions and Transport - email: *FTAreferrals@mcert.govt.nz*
Number of appendices: 7	Appendices: 1. Statutory framework for making decisions 2. Application documents for Whiterock Quarry and Managed Fill project 3. Stage 1 Briefing Note and decisions 4. Section 18 Report on Treaty settlements and other obligations 5. Written comments received from invited parties 6. Further information received from the applicant 7. Draft Notice of Decisions

Ministry contacts

Name	Position	Telephone	1st contact
Stephanie McNicholl	Principal Author		
Stephanie Frame	Manager	s9(2)(a)	✓
Ilana Miller	General Manager	s9(2)(a)	

Project area



Key messages

1. This briefing seeks your decisions under section 21 of the Fast-track Approvals Act 2024 (the Act) on an application from Whiterock Lime Limited (the applicant) to refer the Whiterock Quarry and Managed Fill project (the project) to the fast-track approvals process.
2. A copy of the application is in Appendix 2. This is the second briefing on this application. The first (Stage 1) briefing (BRF-02335) with your initial decisions annotated is in Appendix 3.

3. This is the second referral application. You declined the first application (FTAA– FTAA-2502-1062) in November 2025 based on insufficient information around the economic and employment outcomes the project will deliver and insufficient information as to how the project will deliver significant benefits to the region. The applicant has provided additional information on this matter. All other parts of the project appear to be the same.
4. The project is to construct, establish and operate a Class 3 Managed Fill[1] facility using overburden quarrying and limestone extraction from the existing quarry operation to shape the pit floor and sides over a development area of approximately 5.3 hectares.
5. The project area is approximately 28.93 hectares, located across four properties at 150, 154, 174 and 176 Quarry Road, Loburn, Canterbury Region.
6. The project involves ancillary activities and infrastructure, including:
    a. works in waterways and margins including construction and installation of an access bridge structure
    b. the continued operation of the existing limestone quarry activities and processing facility for approximately 10 years shaping the floor and walls of the managed fill as part of ongoing operations
    c. accepting selected inert construction and demolition materials, specific inert materials (asbestos and cured asphalt impacted by coal tar binders), contaminated soil material and cleanfill
    d. an expected managed fill operational life of 20 years, with a capacity of 800,000 tonnes subject to demand and capacity
    e. construction earthworks, vegetation clearance, excavation and stockpiling associated with the quarrying/managed fill including within waterway and wetland margins
    f. water takes and use, diversion and discharges including stormwater, groundwater, sediment.
7. The project will require the proposed approvals under the fast–track approvals process:
    a. resource consents under the Resource Management Act 1991 (RMA).
8. We recommend you **decline** the referral application under section 21 of the Act as the project does not meet the criteria set out in section 22 of the Act.
9. We consider that you cannot be satisfied that the project will deliver significant regional or national benefits (section 21(3)(a)).
10. We provide a detailed explanation of the recommendation in Table A.
11. We seek your decisions on this recommendation and the notification of your decisions.

Assessment against statutory framework

12. The statutory framework for your decision-making is set out in Appendix 1. You must apply this framework when you are deciding whether to accept or decline the referral application and when deciding on any further requirements or directions associated with referral of the project.

[1] A Class 3 Landfill is defined under the Waste Minimisation (Calculation and Payment of Waste Disposal Levy) Regulations 2009. It accepts solid waste from construction and demolition activities and inert waste from earthworks or site remediation. It does not accept household waste, wate from commercial or industrial sources/processes or waste material from construction and demolition activity (except for inert waste).

13. We have considered the reasons for accepting or declining the project, and we provide our advice on these matters below.

14. Before deciding the project, you must consider the application in Appendix 2, the section 18 Treaty settlements report in Appendix 4, the written comments from invited parties in Appendix 5, the further information in Appendix 6 and any document that requires your consideration under section 16 and comply with any procedural requirements under section 16.

15. Following that, you may accept the application if you are satisfied that it meets the criteria in section 22 of the Act and if there are no reasons you must decline the application under section 21 of the Act.

16. Otherwise, you must decline the application if you are satisfied that it does not meet the criteria in section 22 of the Act, involves an ineligible activity or does not contain adequate information for you to make decisions. You may also decline the application for any other reason, including those listed in section 21(5) of the Act, whether or not the project meets the criteria in section 22 of the Act.

Section 18 Treaty settlements and other obligations report

17. The section 18 report in Appendix 4 identifies three groups as relevant Māori groups under section 18(2) of the Act. One group invited to comment on the application provided a response.

18. The relevant Treaty settlement is the Ngāi Tahu Claims Settlement Act 1998. No other obligations have been identified under section 18(2) as relevant to the project area.

19. In its acknowledgements and apology to Ngāi Tahu, the Crown recognised its failures to fulfil its Treaty obligations and commits to a new age of co-operation with Ngāi Tahu. The Crown also recognised Ngāi Tahu as holding rangatiratanga and mana within the Takiwā of Ngāi Tahu Whānui. We have not identified any other principles and provisions of the Treaty settlement, or other obligations under the Act, which may be directly relevant to this application.

20. Whitiora Centre Limited, on behalf of Ngāi Tūāhuriri, provided comments on the application. Ngāi Tūāhuriri is opposed to the referral application on a number of grounds, including the risk of contamination of the Karetu River and downstream waterbodies which are significant cultural landscapes and mahinga kai, the widespread and long-lasting impact of potential contamination, and insufficient or selective analysis regarding the environmental effects of the project and whether a new landfill is required in the region.

21. We consider the section 18 report does not raise any matters that would make it more appropriate to authorise the proposed approvals under another Act or Acts.

Section 16 Effects of Treaty settlements and other obligations on decision-making

22. Based on the above section, we consider there are no relevant documents and procedural requirements under section 16 that apply to your consideration of the application.

Written comments received

23. Written comments were received from Canterbury Regional Council (CRC), Waimakariri District Council (WDC), Christchurch City Council (CCC), Hurunui District Council (HDC), five Ministers, one identified Māori group and Land Information New Zealand (LINZ).

24. The key points of relevance to your decisions are included in Table A, with the full comments attached in Appendix 5. Comments from one identified Māori group are addressed in paragraph 20 above; all other comments are summarised below.

25. A summary of the key comments received:

a. CRC has not identified any matters that would trigger declining the referral under section 21 of the Act and consider you have adequate information to make decisions. CRC consider any future substantive application should include evidence supporting the proposed waste management and economic and infrastructure benefits. CRC have concerns that the significance of adverse effects particularly regarding the terrestrial and aquatic ecology assessments have not been adequately determined.

b. WDC opposes referral and considers the project would be more appropriately assessed under the RMA, noting existing applications for the project under the RMA have received 573 submissions and 80 submitters requesting to be heard. WDC have concerns whether the project may give rise to significant adverse effects on indigenous biodiversity, freshwater environments, wetlands, and cultural values and whether they can be adequately avoided, remedied or mitigated.

c. CCC commented regarding regional benefits, that an additional landfill in Canterbury is likely to increase the lifespan of Kate Valley Regional Landfill; would also give developers more options for disposal, particularly for Waimakariri District developments; and could lead to more competitive pricing and thus economic benefit.

a. HDC consider the project would be more appropriately assessed under the RMA, noting the same existing applications as WDC. HDC consider the project to have adverse effects on the environment, particularly concerning biodiversity and freshwater; that the project will not deliver significant regional or national benefits, and is not necessary as existing infrastructure (Kate Valley) provides secure regional capacity for residual waste disposal.

d. the Minister for Māori Crown Relations: Te Arawhiti and the Minister for Māori Development support the application progressing and encourage the applicant and the panel to have due regard to relevant Treaty settlement legislation and instruments and any feedback received from identified Māori groups.

e. the Minister for Economic Growth considers the proposal would provide sufficient and persistent regional economic and efficiency benefits to constitute economic benefits under the Act and may improve the efficiency and resilience of Canterbury's waste-disposal system by providing additional regional capacity. The project's operational scale is relatively modest and the estimated efficiency benefits include reduced travel times, emissions, and injury costs. On balance, the project may have significant regional economic benefits.

f. the Minister for Regional Development comments the economic and other benefits of the project appear to concentrate on the benefits of the Class 3 Managed Fill facility component and finds that the facility's operation can generate both ongoing regional economic activity, and incremental efficiency gains by reducing waste disposal haulage distance, travel time, and associated external costs, but notes it is unclear what proportion would be attributed to the quarry operation.

g. the Minister for Building and Construction considers the project will deliver enabling infrastructure that supports housing development, urban growth, brownfield redevelopment, and construction activity by addressing a shortage of Class 3 disposal capacity in Canterbury. The project aligns most closely with Government objectives around housing growth, infrastructure delivery, construction sector productivity, and efficient supporting infrastructure. Significant infrastructure projects in the region are expected to generate

substantial volumes of contaminated material requiring disposal. The project will reduce pressure on Class 1 facilities.

h. LINZ have approved an easement over a Crown–administered hydro parcel and have no other comments.

Further information provided by the applicant

26. The applicant provided further information in response to your request under section 20 of the Act to substantiate the significant economic benefits of the project and to address the relationship of the project to the existing quarry operation. An overview is outlined in Table A, and a summary is provided below:

    a. Regional significance and significant economic benefits:

        i. The regional significance of the project derives from a combination of benefits and is not measured solely by the magnitude of quantified economic benefits, but also the contribution to the efficient functioning of Canterbury's waste management system.
        ii. The project is significant because it will fill an identified gap in Canterbury's disposal infrastructure, by providing dedicated Class 3 capacity.
        iii. The project will improve waste management efficiency by better use of existing waste infrastructure through "right waste, right place" by directing Class 3 material to a facility designed for that material and preserving Class 1 and Class 2 capacity, including at Kate Valley.
        iv. Independent economic analysis identifies substantial economic benefits, including ongoing contributions to regional GDP and employment, together with transport and resource efficiency gains, confirming that Whiterock's benefits extend beyond direct project expenditure.
        v. Productive use of an existing quarry void, by providing new disposal capacity within an already disturbed site while enabling progressive rehabilitation.

    b. Ongoing quarry operations:

        i. The Project does not rely on the ongoing quarry operation to establish significant regional benefits under section 22(1)(a).
        ii. The ongoing quarry operations provide the following supplementary benefits:
            1) Agricultural support - Continued supply of agricultural lime to Canterbury's agricultural sector, supporting soil management and productive land use.
            2) Construction and infrastructure - Supply of track rock for dairy lanes, access roading and associated infrastructure activities.
            3) Regional economic activity - Continued employment, contractor engagement and expenditure through local processing, transport and supply chains.
            4) Transport efficiency - Co-location of quarrying and managed fill operations creates opportunities for truck back loading.
            5) Efficient creation and use of the quarry void – for the managed fill while generating saleable limestone products.

    c. The report maintains the conclusions that the project will deliver significant and sustained economic benefits to the region.

27. You must consider all information received within the specified timeframe. We have taken this information into account in our analysis and advice, and it is presented in Table A.

Reasons to decline

28. The statutory framework in Appendix 1 sets out the situations where you must decline the application for referral under section 21(3) of the Act. You must decline the referral application if:
    a. you are satisfied the project does not meet the referral criteria in section 22 [*section 21(3)(a)*]
    b. you are satisfied the project involves an ineligible activity [*section 21(3)(b)*]
    c. you consider you do not have adequate information to inform your decision [*section 21(3)(c)*].
29. You must decline an application if you consider it cannot be accepted under section 22, which requires that:
    a. the project is an infrastructure or development project that would have significant regional or national benefits; and
    b. referring the project to the fast-track approvals process:
        i. would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and
        ii. is unlikely to materially affect the efficient operation of the fast-track approvals process.
30. We consider that you cannot be satisfied the project meets the referral criteria in section 22 as it is not an infrastructure project that would have significant regional or national benefits.
31. The applicant has provided assessment of the criteria in section 22(2)(a) and considers the project:
    a. though not identified as a priority project, will align with national and regional policy settings
    b. will deliver new regionally or nationally significant infrastructure in terms of the Class 3 managed fill
    c. will support the increase in housing supply, address housing needs and contribute to a well-functioning urban environment by enabling waste disposal options to support housing construction
    d. will deliver significant economic benefits, for the following reasons:
        i. by directing suitable Class 3 material away from higher-specification landfills, reserving those facilities for waste streams requiring greater levels of containment, deferring the need to provide additional higher-cost Class 1 and Class 2 capacity, by increasing disposal choice and supporting a more resilient regional network
        ii. the revised economic report determined that the previously declined referral application submission required a focus on economic benefits, demand for additional capacity and regional significance. The revised report clarifies demand and identifies the project will inject $17.3 million ($1.76 million annual) into the regional economy over 20 years of operation and create approximately 8.7 full-time equivalent (FTE) employees ongoing.
    e. support climate change mitigation, address significant environmental issues and be consistent with local planning documents.
32. We consider that you can be satisfied that the project does not involve an ineligible activity.
33. We consider that you have sufficient information to inform your decisions.
34. Our full analysis of the criteria is provided in Table A, with a summary of the relevant criterion below:

a. *deliver new regionally or nationally significant infrastructure* – we consider the scale of the benefits identified is not specific to the project but rather the wider waste management network and it is insufficient to meet the threshold of significant regional benefit under this criterion.

b. *increase housing supply, address housing needs, or contribute to a well-functioning urban environment* – we consider that while the project may provide indirect benefits to the construction sector, it does not increase housing supply or contribute to a well-functioning urban environment.

c. *deliver significant economic benefits* – we consider that while the project may provide indirect economic benefits to the wider waste management network, it will not be of a scale to deliver significant economic benefits at a regional or national level. We note CRC has queried the methodology underpinning the applicant's economic assessment and the resulting estimates and the Minister for Economic Growth has characterised the project's impact on jobs and GDP as modest.

d. *support climate change mitigation or adaptation, address significant environmental issues, or be consistent with local planning documents* – we do not consider that the scale of the benefits identified is sufficient to meet the threshold of significant regional benefit under this criterion.

35. Based on the above, we consider you must decline this application under section 21(3)(a) of the Act, as the project does not meet the criteria under section 22 of the Act.

36. You may also decline the application for any other reason under section 21(4). The Act gives some guidance on matters you could consider when deciding whether to decline an application and these are set out in Table A.

37. The project has been previously lodged with CRC and WDC under the RMA. The resource consent applications were notified at the applicant's request and received 573 submissions (510 in opposition, 57 in support and 6 neutral). WDC consider the level of public interest from submitters indicates the RMA process may be more appropriate than the fast–track approvals process for this project. We note the RMA application is on hold since the close of submissions while the applicant is pursuing the referral application under the Act.

38. Based on the current RMA applications and submissions response, we have considered whether you should decline the project on the basis that it would be more appropriate to deal with the matters under another Act or Acts [section 21(5)(b)]. We note the project is not identical to that being sought through the RMA and a panel can invite comments from any parties it considers relevant, however we recommend that if you refer the project, you direct a panel to invite comments from the submitters on the notified consent who requested to be heard. Overall, we consider you should not decline the application on this basis. Also, we note the project may have significant adverse effects on the environment {section 21(5)(c)], however on balance, we consider that this is a matter where a panel can seek further information, and we do not recommend that you decline the application on this basis.

39. We note our consideration is based on the available information; however, you retain the discretion to agree or disagree with our recommendations and determine the outcome of the referral application.

Reasons to accept

40. The statutory framework in Appendix 1 sets out the reasons you can accept a project for referral and refer the project to the fast–track approvals process.

41. Our assessment of these matters is summarised in Table A. As noted above, we consider the project does not meet the requirements under section 22 of the Act. If you agree, you must decline the referral application under section 21(3)(a) of the Act.

Conclusions

42. We consider the project does not meet the section 22 criteria and you must decline the referral application under section 21(3) of the Act because the project is not an infrastructure or development project that would have significant regional or national benefits.

Next steps

43. The Secretary for the Environment (the Secretary) must give notice of your decisions on the referral application, and the reasons for them, to the applicant and anyone invited to comment under section 17 of the Act and publish the notice on the Fast-track website.

44. We will undertake this action on your behalf.

45. We have attached a draft notice of decisions letter to the applicant based on our recommendations in Appendix 7, that we will provide as required (on behalf of the Secretary for the Environment) to all relevant parties. We will provide you with an updated letter if required or an amended letter if you decide to refer the application.

46. Our recommendations for your decisions follow.

Recommendations

47. We recommend that you:

a. **Note** section 21(3) of the Fast-track Approvals Act 2024 (the Act) requires you to decline the referral application from Whiterock Lime Limited (the applicant) if you are satisfied that the project involves an ineligible activity, or you consider that you do not have adequate information to inform the decision under this section or if you are not satisfied that the Whiterock Quarry and Managed Fill Project (the project) meets the referral criteria in section 22 of the Act.

Noted

b. **Agree** that before deciding on the application for project referral under section 21(1) of the Act you have considered the:

i. application in Appendix 2

ii. the report obtained under section 18 in Appendix 4

iii. written comments sought under section 17 in Appendix 5 and further information sought under section 20 in Appendix 6 provided within the required time frame.

Yes / No

c. **Note** that in considering this application, and any directions to a panel, under section 7 of the Act, you have considered the:

i. Ngāi Tahu Claims Settlement Act 1998.

Noted

d. **Note** that under section 21 you must decline a referral application if:

i. the application may not be accepted under section 21(1) (which relates to the criteria for assessing a referral application in section 22); or

ii. you are satisfied that the project involves an ineligible activity; or

iii. you are satisfied that you do not have adequate information to inform your referral decision

Noted

e. **Note** that you may decline a referral application for any other reason, whether or not the project meets the criteria in section 22, including (but not limited to) the reasons for decline set out at section 21(5).

Noted

f. **Decline** the referral application under section 21 of the Act on the basis that you:

i. **agree** that the project does not meet the referral criteria under section 22 of the Act because it is not an infrastructure or development project that would have significant regional or national benefits [*section 21(3)(a)*]. Specifically, you agree that the project will not:

(1) deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure

(2) increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment

(3) deliver significant economic benefits

(4) deliver any other benefits that would lead you to consider that the project would have significant regional or national benefits.

Yes / No

g. **Note** that the Secretary for the Environment must provide your notice of decisions to:

i. the applicant and anyone invited to comment on the application including relevant local authorities, relevant portfolio Ministers, relevant Māori groups and any additional parties

ii. the EPA to publish the notice to the Fast–track website.

Noted

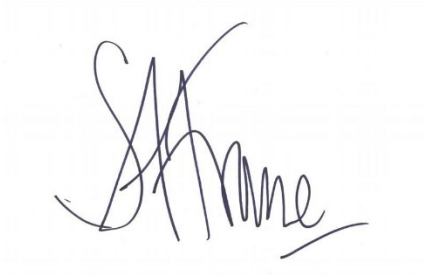
h. **Note** that should you disagree with our recommendation and decide to accept the referral application, we will provide you with further advice and a revised notice of decisions letter, along with our recommendations for proposed directions to a panel and the applicant.

Noted

i. **Approve** the draft notice of decisions letter to the applicant in Appendix 7.

Yes / No

Signatures



Stephanie Frame
Manager – Fast–track Operations

Hon Chris Bishop
Minister for Infrastructure

Date:

Table A: Stage 2 analysis – FTAA–2607–1269

<table>
<tr><td>Recommendation</td><td colspan="3">Decline the referral application</td></tr>
<tr><td rowspan="2">Project details</td><td>Project Name</td><td>Applicant</td><td>Project Area</td></tr>
<tr><td>Whiterock Quarry and Managed Fill (the project)</td><td>Whiterock Lime Limited (the applicant)</td><td>The project area is approximately 28.93 hectares, located across four properties at 150, 154, 174 and 176 Quarry Road, Loburn, Canterbury Region.</td></tr>
<tr><td>Project description</td><td colspan="3">The project is to construct, establish and operate a Class 3 Managed Fill landfill facility using overburden quarrying and limestone extraction from the existing quarry operation to shape the pit floor and sides over a development area of approximately 5.3 hectares.

The project area is approximately 28.93 hectares, located across four properties at 150, 154, 174 and 176 Quarry Road, Loburn, Canterbury Region.

The project involves ancillary activities and infrastructure, including:
a. works in waterways and margins including construction and installation of an access bridge structure
b. the continued operation of the existing limestone quarry activities and processing facility for approximately 10 years shaping the floor and walls of the managed fill as part of ongoing operations
c. accepting selected inert construction and demolition materials, specific inert materials (asbestos and cured asphalt impacted by coal tar binders), contaminated soil material and cleanfill
d. an expected managed fill operational life of 20 years, with a capacity of 800,000 tonnes subject to demand and capacity
e. construction earthworks, vegetation clearance, excavation and stockpiling associated with the quarrying/managed fill including within waterway and wetland margins
f. water takes and use, diversion and discharges including stormwater, groundwater, sediment

The applicant seeks the proposed approvals under the fast-track approvals process:
a. resource consents under the Resource Management Act 1991</td></tr>
<tr><td rowspan="2">Minister invites comments [section 17] and requests information [section 20]</td><td colspan="3">Written comments from invited parties</td></tr>
<tr><td colspan="3">A summary of the written comments is provided below, full copies are included in Appendix 5.

Local authorities

Canterbury Regional Council (CRC) – commented that:
a. Overall, CRC has not identified any matters that would trigger declining the referral under section 21, however the absence of such matters should not, in itself, be taken as demonstrating that the proposal meets the criteria for acceptance under section 22 of the Act.
b. CRC considers that sufficient information has been provided to inform the Minister's decisions on the referral application
c. Based on reviews by economic and waste management experts, the evidence does not support the applicant's statements that the proposal would provide significant regional or national benefits under section 22(1)(a) of the Act. If referred, any future substantive application should include evidence supporting the proposed waste management, economic and infrastructure benefits
d. If referred, submitters to the existing RMA applications should be identified in the decisions as parties invited to comment on the substantive application under section 27(3)(b)(iii), allowing matters raised through the RMA process to be considered by the Expert Panel
e. The RMA application has the potential for significant adverse effects on the environment. Although this referral application includes changes from both the RMA application and previously sought referral and the technical updates appear to address some of the concerns previously identified, CRC's technical experts would need to undertake a detailed review of the updated proposal before it could be determined whether the amendments reduce the significance of the effects, particularly the terrestrial and aquatic ecology assessments.
f. In relation to the claimed benefit of providing additional Class 3 managed fill capacity, the waste demand advice received by CRC acknowledges that the proposal would expand disposal options and increase competition in Canterbury but considers that the proposal does not demonstrate a critical demand or regional significance given the other disposal options and increasing recovery outlets available in the Canterbury market. On this basis, CRC does not consider that the proposal would address a significant regional need for waste disposal capacity to support the development industry.
g. CRC acknowledges that the quarrying operation also supports the primary sector through the supply of AgLime. However, AgLime is supplied by a number of other sites in the vicinity and across the region, and CRC does not consider that this establishes a significant regional or national benefit.
h. Existing resource consent applications lodged with CRC have been identified from the same applicant, which are currently suspended, pending the outcome of this referral application, which are substantially the same as the project seeking fast–track approvals. (We note these would not be considered competing applications if a substantive application for the project were lodged).
i. No existing resource consents on or adjacent to the site of the kind referred to in section 30(3)(a) have been identified where sections 124(1) (c) or 165ZI of the RMA could apply, if the project were to be applied for as a resource consent.

We note that CRC considers submitters to the existing RMA application should be identified as parties who may be invited to comment on the substantive application; and has questions about the applicant's economic benefits presented and model used to quantify those benefits. We consider these are matters a panel is able to assess when presented with a comprehensive substantive application, if referred to the fast–track approvals process.</td></tr>
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Waimakariri District Council (WDC) – does not support the project being referred and commented that:

a. There are reasons under section 21(5) to decline the application for referral because, in WDC's view, the proposal is not justified for referral and is more appropriately considered through the existing notified RMA process (section 21(5)(b) of the Act). The WDC section 42A officer report identified concerns regarding the potential for significant adverse effects on indigenous biodiversity, freshwater environments, wetlands, and cultural values and whether they can be adequately avoided, remedied, or mitigated, recommending that consent be declined (section 21(5)(c) of the Act).
b. The project has not demonstrated the significant regional or national benefits contemplated by the Act. The managed fill has not been shown to address a regional waste capacity shortfall, with existing consented facilities, including Kate Valley Landfill, continuing to provide substantial disposal capacity. WDC is also not satisfied that the economic benefits identified by the applicant are sufficiently certain or of sufficient scale to represent significant regional or national benefits. This assessment is supported by the independent peer reviews (Economic and Waste Demand).
c. The proposal is already subject to a comprehensive notified resource consent process before WDC and CRC. The application has attracted 573 submissions and hearing requests from approximately 80 submitters. WDC considers the environmental, cultural, technical and planning matters are appropriately being addressed through the existing statutory process and considers that process remains the most appropriate forum for assessing the merits of the proposal.
d. Existing and planned waste disposal infrastructure within Canterbury, including Kate Valley Landfill and other Class 2 landfill facilities, provides substantial existing and future disposal capacity. WDC is not satisfied that the applicant has demonstrated an unmet regional need for the proposed facility. This conclusion is supported by the Waste Demand Peer Review.
e. The proposal is not identified as a priority project in any national infrastructure strategy, regional infrastructure programme, spatial plan, waste management strategy, or local government policy document. WDC therefore does not consider the proposal has demonstrated recognised strategic significance at a regional or national level.
f. In summary, WDC considers that the proposal has not demonstrated a strategic need regional waste capacity shortfall, or significant regional or national benefits sufficient to justify referral under the Act. WDC further considers that the proposal may give rise to significant adverse environmental effects and is more appropriately assessed under the RMA.
g. An existing resource consent application lodged with WDC has been identified from the same applicant, who requested public notification. The application is on hold. *(We note this would not be considered competing applications if a substantive application for the project were lodged).*
h. No existing resource consents on or adjacent to the site of the kind referred to in section 30(3)(a) have been identified where sections 124(1) (c) or 165Zl of the RMA could apply, if the project were to be applied for as a resource consent.

We note WDC consider the RMA process to be more appropriate than the fast-track approvals process, based on potentially significant adverse environmental effects. However, the applicant retains the ability to provide further analysis on the matters raised to assist a panel in understanding any impediments to delivery of the project. In addition, a panel can seek further information from local authorities and/or the applicant when presented with a comprehensive substantive application, if referred to the fast–track process.

Ministers

Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development – supported the application progressing subject to the applicant and the panel having regard to relevant Treaty settlement legislation and instruments; and any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report.

Minister for Economic Growth – commented that:

a. The economic material in the proposal does not quantify capital expenditure or construction-related GDP, employment, or wages. Once operational, the facility is estimated to support approximately 8.7 full-time equivalent (FTE) jobs and generate approximately $1.76 million in annual GDP, including direct, indirect, and induced effects. Over its assumed 20-year operating life, the present value of this contribution to Canterbury's GDP is estimated at approximately $17.3 million, using an 8 per cent discount rate. Operational revenue and wages are not separately quantified.
b. The facility may also improve the efficiency and resilience of Canterbury's waste-disposal system by providing additional Class 3 capacity for Greater Christchurch and North Canterbury. This could reduce reliance on more distant or constrained facilities and divert suitable materials from higher-specification landfills
c. On balance, the project would provide sufficient and persistent regional economic and efficiency benefits to constitute economic benefits under section 22(2)(a)(iv) of the Act. These benefits arise from its ongoing contribution to regional GDP and the potential for additional Class 3 capacity to improve the efficiency and resilience of Canterbury's waste-disposal system. While the project's operational scale is relatively modest and the estimated efficiency benefits are sensitive to modelling assumptions, those benefits are expected to persist over the assessment period and include reduced travel times, emissions, and injury costs. The proposal may also be relevant to section 22(2)(a)(iii), as additional disposal capacity could reduce the risk that contaminated-soil disposal constraints impede housing and brownfield development. However, this would be an indirect enabling effect rather than a direct increase in housing supply.

Minister for Regional Development – commented that:

a. The Minister for Infrastructure previously declined a referral application for this project, based on insufficient detail around the economic and employment outcomes and other benefits the project will deliver. In the new application, the applicant has provided updated supporting material on the economic and other benefits of the project. The material provided appears to concentrate on the benefits of the Class 3 Managed Fill facility component of the project.
b. The applicant's updated economic assessment finds that the facility's operation can generate both ongoing regional economic activity, and incremental efficiency gains by reducing waste disposal haulage distance, travel time, and associated external costs. The assessment states that there are constraints on disposal facility availability for contaminated soils in Canterbury, resulting in increased costs and reliance on more distant disposal sites. Accordingly, the Whiterock facility would expand the region's disposal network by providing a well-located option closer to major sources of waste generation in Christchurch City and surrounding districts.
c. The Government's Minerals Strategy identifies minerals as essential inputs to sectors including agriculture, infrastructure and construction, and recognises the minerals sector as an important contributor to economic growth, regional development and a productive and resilient economy. The Strategy also recognises the importance of maintaining access to the mineral inputs required by key sectors of New Zealand's economy. The project would enable the continued extraction and processing of limestone resources at the existing Whiterock Quarry, which has operated since the 1940s and supplies agricultural lime for use in the farming sector. Agricultural lime is an important input to New Zealand's primary production sector. The continued operation of the Whiterock Quarry would support the local production and supply of agricultural lime for farmers in Canterbury and surrounding regions, while sustaining mineral extraction and processing activity at an established quarry site

d. As outlined, the applicant states that the project would generate economic benefits through the continued operation of the quarry and lime processing activities, together with the development of a Class 3 Managed Fill facility. It is unclear what proportion of the project's economic benefits would be attributed to the quarry operation.

Minister for Building and Construction – commented that:

a. The project will deliver enabling infrastructure that supports housing development, urban growth, brownfield redevelopment, and construction activity by addressing a recognised shortage of suitable Class 3 disposal capacity in Canterbury. The project aligns most closely with Government objectives around housing growth, infrastructure delivery, construction sector productivity, and efficient supporting infrastructure.
b. The proposal aligns with the Government's Going for Housing Growth programme to support housing growth and infrastructure delivery by "…*Removing unnecessary planning barriers to urban growth*."
c. By providing for adequate disposal of fill, the proposal additionally amounts to enabling infrastructure that reduces a practical development bottleneck. This supports increased housing supply and urban development by addressing a key enabling constraint – the disposal of contaminated soil.
d. Existing disposal options are already constrained, including that Burwood has limited acceptance criteria and uncertain long-term availability; Kate Valley has intake constraints and higher costs; and some projects have been known to send material as far as South Canterbury or the West Coast for disposal.
e. Significant infrastructure projects in the region are expected to generate substantial volumes of contaminated material requiring disposal. Without adequate disposal capacity, costs and project delays are likely to increase.
f. The establishment of a managed fill (sic) at Whiterock will enable more cost-effective waste management by diverting inert materials and therefore reducing pressure on Class 1 facilities.
g. The project is broadly consistent with Government objectives relating to housing growth, construction activity, and supporting infrastructure.

Māori Groups

Whitiora – commented for Ngāi Tūāhuriri that:

a. The project adjoins the Karetu River, which is a tributary to the Ōkūkū and Rakahuri Rivers. These awa and their surrounding environments are of significant cultural value to Ngāi Tūāhuriri. The awa are identified as Ngā Wai in the Partially Operative Waimakariri District Plan (SASM028) reflecting their importance as traditional mahinga kai, as well as being places of significant events, occupation, historic access, and travel routes. The awa also carry significance in respect of tikanga and the exercise of rangatiratanga. The condition and treatment of Ngā Wai is considered a reflection on the health and regard for the environment.
b. During the late 1990s, Ngāi Tahu worked in good faith with all local government entities in Canterbury to find a single waste-treatment site for North and South Canterbury regions. Following a combined Council process of site assessment and community engagement, Ngāi Tūāhuriri agreed to the location of the site in Kate Valley. The reasons were that a single site was better for the environment than the numerous sites scattered throughout Canterbury. The Kate Valley site would be designed to protect the environment and was chosen for its capacity to accept waste for decades to come. Whitiora understands there is sufficient capacity at Kate Vally to accept the waste proposed to be diverted to Whiterock.
c. This project represents a return to locally sited and fragmented waste management and falls short of the collaborative work undertaken by Ngāi Tūāhuriri, the community, waste management and the councils in the 1990s to follow industry best practice and reduce the risks caused by dispersed and poorly located landfills.
d. The applicant's economic assessment does not provide a comprehensive assessment of the waste management system within Canterbury and is selective in the sites it has included. The Ministry for the Environment waste facility locations register has 16 listed Class 3 & 4 waste disposal facilities within the Christchurch City Council district, with more in the surrounding areas. These have not been mentioned, with the exception of Taiko Road and Kate Valley. Woodstock and Burwood were left out on 'analytical grounds' – both of these have been issued consents prior to this application being lodged.
e. Ngāi Tūāhuriri matters of concern include:
    i. The Karetu River is a culturally significant waterway and is part of a significant cultural landscape. The project fails to recognise the inherent cultural values associated with the Karetu River, the Ōkūkū River and the Rakahuri catchment, noting that the loss of cultural values is permanent; The project is inappropriately located at the head of a catchment, and the local geology and topography does not provide effective, long-term containment of leachate without a high level of engineering. There are risks for discharge of contaminants to the Karetu River and all other downstream (ground and surface) waterbodies if the engineered base is inadequate or fails; Any contamination would diminish the mauri of waterways, along with the taonga species, aquatic ecosystems and mahinga kai; Construction phase impacts on the river, downstream habitats, taonga species, fish and other freshwater biota;
    ii. The methodology applied in previous applications assessed the magnitude of environmental effects relative to the wider Rakahuri/Ashley River catchment; and not the Karetu River which is the catchment directly impacted; The previous application failed to appropriately assess the cumulative effects of the project in combination with other activities and land uses within the Ōkūkū and Rakahuri catchments on water quality in surface and groundwater bodies;
    iii. The loss of wetlands which are a taonga to Ngāi Tūāhuriri;
    iv. If the landfill is established and there are consequential adverse effects on the Karetu River and the Rakahuri catchment, the effects are unlikely to be reversible or mitigated immediately. Any leakage with consequential contamination from buried materials may exist for years and generations to come. It is assumed that in the event of contamination, removal of buried materials would be cost prohibitive;
    v. The project has the potential, if consented, to create a precedent for other landfills which are in dispersed and unplanned locations; The project has the potential to become a permanent and long-term facility i.e. its establishment will become an accepted part of the environment that can be expanded and/or used to accept a wider range of waste materials in the future. It is noted that the project proposes to establish and operate a Class 3 landfill but will be constructed as a Class 1 landfill (with liner and a leachate pond system). This further underlines the concern that the project will become a long-term facility for wider waste management purposes;
    vi. That an application is able to proceed without an assessment of alternative sites and the costs and benefits of those alternatives in respect of their impacts on social, cultural and environmental values.
    vii. The application does not provide a complete overview or assessment of all existing listed Class 3 & 4 waste disposal sites.
f. In a previous application for the project, Ngāi Tūāhuriri submitted that the existing site operation fell short of current and expected best practice in environmental management, particularly in relation to stormwater management and discharges to the environment, which has reduced confidence that the proposed landfill will be managed in compliance with consent conditions and with care. Ngāi Tūāhuriri requests close consideration of management practices as part of any assessment of an application under the Act.
g. Ngāi Tūāhuriri expects the above matters to be considered in the assessment of the referral application.

Administering agencies – N/A

Any other persons or groups

	Christchurch City Council (CCC) – commented that: a. In relation to the regional benefits of the proposed managed fill in accepting construction and demolition waste to the facility, including post-earthquake demolition waste, an additional landfill in Canterbury: i. Is likely to increase the lifespan of Kate Valley Regional Landfill. ii. Would also give developers more options for disposal, particularly for Waimakariri District developments. iii. More disposal options could lead to more competitive pricing and thus economic benefit. b. Overall, the economic impact could be positive dependent on accessibility for the wider market to use the site and the site gate fee pricing. In providing these comments, CCC have had regard to the information provided with the referral application setting out the anticipated regional benefits, including the economic assessment. For completeness, CCC have not sought a peer review of the provided assessment or alternative economic assessment. *Hurunui District Council (HDC)* – commented that: a. The same application has been lodged and being processed by WDC and CRC. The application has been publicly notified, with 573 submissions, and is subject to hearing requests of 80 submitters. Allowing Whiterock to proceed via fast-track process would bypass the hearing process and undermine fairness and natural justice to the community who have submitted on the proposal. b. The proposal is not identified in any central government or local government strategy, spatial plan, or infrastructure priority list, and therefore carries no recognised strategic weight. The project duplicates services already provided in North Canterbury and does not address any identified infrastructure gap. It would not deliver significant regional or national benefits. The project, under the current resource consent process, was deemed to have adverse effects on the environment, particularly concerning biodiversity and freshwater. c. Based on advice received by WDC as part of the resource consent process, mana whenua (Ngāi Tūāhuriri) strongly oppose the project due to effects to cultural landscapes, mahinga kai, and kaitiakitanga. d. Existing infrastructure already provides secure regional capacity for residual waste disposal, making the Whiterock proposal unnecessary. Canterbury has a Class 1 regional landfill at Kate Valley in the Hurunui District. It was established as a regional facility and consented by HDC and CRC to 2039. It has airspace remaining within the current consented profile and footprint to the mid-2040s at least. HDC understands Transwaste Canterbury Limited will further seek to maximise the current landfill before looking at alternate suitable sites at Kate Valley utilising the existing facilities. e. Kate Valley is a class 1 facility for levy purposes but is expecting to have approval from MfE (sic) for a class 2 designation for part of its site from mid-November. This will not alter the consent conditions or environmental standards but will reduce the rate of levy charged and passed on to the customer for appropriate waste streams. Burwood managed fill owned by CCC is currently having its consent extended annually, however CCC have advised it has 5 or more years capacity remaining and they are expecting to keep extending until filled. Kate Valley is the region's established, consented, and operating landfill. It was set up through a regional planning process, with substantial investment, and has the capacity to meet the region's waste disposal needs into the future. f. Kate Valley was specifically set up as a public/ private partnership between CCC, and the District Councils of Ashburton, Hurunui, Selwyn and Waimakariri, and the private sector to manage Canterbury's waste streams and provide assurance to the community that no further small-scale localised landfills will be developed across the region. This approach also had the support of Canterbury's Papatipu Runanga. Kate Valley is 15 km further from Christchurch CBD than the proposed location of the Whiterock landfill. Kate Valley already provides this service; there is no evidence provided demonstrating the need for a second landfill. Establishing a privately-owned landfill would duplicate existing infrastructure, fragment waste streams, and undermine the coordinated regional approach that led to Kate Valley being chosen and developed. This proposal is therefore unnecessary, inefficient, and inconsistent with good planning outcomes. g. HDC does not consider the project to be a priority, nor one that would deliver significant regional or national benefits. Although HDC comments that the same application has been lodged with the relevant local authorities, we note CRC have commented that the referral application has been updated and includes changes to address some of the concerns raised in the RMA applications and previous referral application. We noted that the project area is located adjacent to HDC's territorial boundary shared with WDC and with that context asked whether there were any cross–boundary jurisdiction matters that HDC consider may affect the delivery of the project. No concerns were raised on this matter in the comments. *Land Information New Zealand (LINZ)* – did not oppose referral and commented that: There is LINZ-administered Crown land on the right half width to the centre line of the Karetu River's bed, which lies within the project site. In February 2026, the Commissioner of Crown Lands approved an application under the Land Act 1948, resulting in an easement being permitted over this area of Crown land for Whiterock Lime Limited to use. As access arrangements are already in place, LINZ has no further comments to make.
Minister must decline an application if the Minister is satisfied that the project involves an ineligible activity [section 21(3)(b)]	We consider you can be satisfied that the project does not involve an ineligible activity because it: a. *would not occur on identified Māori land, Māori customary land or a Māori reservation* – as confirmed by the relevant records of title and consultation with iwi authorities b. *would not occur in a customary marine title area or protected customary rights area* – and is land–based c. *is not an aquaculture activity or activity that is incompatible with aquaculture activities that would occur in an aquaculture settlement area and for which the applicant is not authorised to apply for a coastal permit* – because it will not occur in the CMA and will not occur in an aquaculture settlement area d. *would not require an access arrangement which cannot be granted under the Crown Minerals Act (including s61(1A))* – because it does not include this type of access arrangement and would not occur on Schedule 4 land e. *would not be prevented by section 165J, M, Q, ZC or ZDB of the RMA* – because it will not occur in the CMA f. *would not occur on Schedule 4 land* – as confirmed by the records of title referred to in the application g. *would not occur on a national reserve* – as confirmed by the records of title referred to in the application h. *would not occur on a reserve held under the Reserves Act 1977 that is managed by or vested in someone other than the Crown or a local authority and that person has not consented in writing* – as confirmed by the records of title and applicant's evidence of consultation i. *is not a prohibited activity or decommissioning activity under the EEZA, 15B or 15C of the RMA* – and as no such activities are proposed j. *is not for the purpose of an offshore renewable energy project* – and as no such activities are proposed. No comments raised by parties invited to comment have indicated that the project would be ineligible for referral.

Minister must decline an application if the Minister considers they do not have adequate information to inform the decision [section 21(3)(c)]	We consider you have adequate information to inform your decisions on the referral application.
Relevant considerations and procedural requirements in Treaty settlement, Mana Whakahono ā Rohe, joint management agreement, or the Marine and Coastal Area (Takutai Moana) Act 2011 or the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 [section 16]	We have not identified any matters under section 16 of the Act that apply to your consideration of the referral application.
Section 22 assessment criteria	
The project is an infrastructure or development project that would have significant regional or national benefits [section 22(1)(a)]	*You must consider a relevant Government policy statement (GPS) [s22(1A)]* No GPS has been identified by the applicant as being relevant to the application. You may consider any of the following matters, or any other matters you consider relevant: *The project has been identified as a priority project in a central or local government, or sector plan or strategy or a central government infrastructure priority list [section 22(2)(a)(i)]* Indirectly, the applicant considers the project is strongly aligned with national and regional policy settings including the Waste Minimisation Act 2008, the Waste and Resource Efficiency Strategy 2025 and regional and territorial authority waste management and minimisation plans. We note that none of the documents identify the project as a priority project which **does not satisfy the criterion**. We do not recommend that you refer the project on this basis. *Will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure [section 22(2)(a)(ii)]* The applicant states the project will create a Class 3 managed fill that will add to Canterbury's waste disposal system capacity by directly addressing limited capacity disposal options, restrictive acceptance criteria and operational limitations of other landfills in the region. The applicant considers the project qualifies as regionally significant infrastructure because the National Policy Statement for Infrastructure 2025 (NPS–I) definition of 'additional infrastructure' includes: *resource recovery or waste disposal facilities*. The Canterbury Land and Water Regional Plan definition of 'Nationally and regionally significant infrastructure': *"includes, but is not limited to, infrastructure for activities recognised by a National Policy Statement as being nationally significant". (The project includes bridge construction, the NPS–I definition of ancillary infrastructure activities includes construction, maintenance, repair and upgrading of access tracks, bridges and culverts).* While we agree with the applicant's assessment that the project meets the definition if infrastructure, we do not consider the applicant has provided information to demonstrate that it is "regionally or nationally significant infrastructure" as required by this criterion. We consider the applicant's quoted benefits are not sufficient to be considered regionally significant and as such the project **does not satisfy the criterion**. We do not consider you should refer the project on this basis. *Will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020 (NPS–UD)) [section 22(2)(a)(iii)]* Indirectly, the applicant considers this will be delivered by enabling the disposal of contaminated soils and construction and demolition materials generated through both greenfield and brownfield development. The Minister for Building and Construction commented that the project will deliver enabling infrastructure that supports housing development, urban growth, brownfield redevelopment, and construction activity by addressing a recognised shortage of suitable Class 3 disposal capacity in Canterbury. While the project may provide flow-on benefits to the construction industry, we do not consider the project will increase the supply of housing, address housing needs or contribute to a well-functioning environment within the meaning of the NPS–UD, and as such **does not satisfy the criterion**. We do not recommend that you refer the project on this basis. *Will deliver significant economic benefits [section 22(2)(a)(iv)]* The applicant's economic report states that the project will deliver significant economic benefits to the region by directing suitable Class 3 material away from higher-specification landfills, which will reserve those facilities for suitable waste streams and that this will defer the need to provide additional capacity within those higher-cost Class 1 and Class 2 facilities. The project will increase disposal choice and support a more resilient regional network A revised economic report determined that the previously declined referral application submission identified economic and system–level benefits of the proposal and that a focus on economic benefits, demand for additional capacity and regional significance was required. The revised report clarifies demand and identifies the project will inject $17.3 million ($1.76 million annual) into the regional economy over 20 years of operation and create approximately 8.7 FTE ongoing jobs.

Both CRC and WDC strongly consider the extent to which the project will deliver significant regional benefits is not supported. CRC comments include a peer review of the applicant's revised economic report which raised concerns with the methodology used and considers a cost benefit analysis is required.

The Minister for Economic Growth considers that on balance the project may have significant regional economic benefits under section 22(2)(a)(iv) of the Act from ongoing contributions to regional GDP and the potential for additional Class 3 capacity to improve the efficiency and resilience of Canterbury's waste-disposal system. Efficiency benefits over the assessment period may also include reduced travel times, emissions, and injury costs.

The applicant provided further information to substantiate and quantify the significant economic benefits (particularly direct economic benefits) of the project (including the underlying metrics, assumptions, and methodology used, as well as the anticipated scale, geographic extent, and duration of any such benefits) and the relationship of the project to the existing quarry operation. A full copy of the response is included in Appendix 6. In summary, the response states:

Regional signification and significant economic benefits:

a. The regional significance of the project derives from a combination of benefits. The economic benefits are a material aspect of the overall assessment and are substantial. However, this is one of those cases where regional significance is not measured solely by the magnitude of quantified economic benefits, but also by the contribution the project makes to the efficient functioning of Canterbury's waste management system and the development and infrastructure that system supports.
b. Significant economic benefits are one matter under section 22 of the Act; the project delivers benefits across several of those matters. Its regional significance arises from the provision of new regional infrastructure, enabling existing regionally significant landfill infrastructure to be used for its intended purpose, and the wider economic and other benefits identified in the application.
c. The project is significant because it will:
    i. Fill an identified gap in Canterbury's disposal infrastructure, by providing dedicated Class 3 capacity serving Greater Christchurch and the wider Canterbury region.
    ii. Improve waste management efficiency by better use of existing waste infrastructure through "right waste, right place", by directing Class 3 material to a facility designed for that material rather than unnecessarily using Class 1 and Class 2 capacity, including at Kate Valley. This keeps specialised landfill capacity available for waste streams that require higher levels of containment and environmental control. Independent economic analysis identifies substantial economic benefits, including ongoing contributions to regional GDP and employment, together with transport and resource efficiency gains. It confirms that Whiterock's benefits extend beyond direct project expenditure.
    iii. Enable the continued functioning of existing regionally significant infrastructure, by preserving Class 1 and Class 2 landfill capacity for waste requiring those higher levels of containment.
    iv. Support housing, urban development and infrastructure delivery by providing a compliant disposal pathway for contaminated soils and construction and demolition materials generated by those activities. Much of the material Whiterock is intended to receive arises from housing, urban development and infrastructure construction, maintenance and renewal. Providing an appropriately located and cost-effective disposal pathway for that material supports the efficient delivery of those activities.
    v. Make productive use of an existing quarry void, by providing new disposal capacity within an already disturbed site while enabling progressive rehabilitation.
d. The project's significance needs to be considered across the full package of regional benefits it delivers.
e. The report maintains the conclusions that the project will deliver significant and sustained economic benefits to the region.

Quarry operations:

a. The Project does not rely on the ongoing quarry operation to establish significant regional benefits under section 22(1)(a). The basis for regional significance is a combination of benefits arising from the Class 3 managed fill infrastructure and the regional function it performs within Canterbury's waste-management network. The ongoing quarry activity nevertheless provides supplementary benefits that form part of the overall package of Project benefits.
b. The ongoing quarry operations provides the following supplementary benefits:
    i. Agricultural support - Continued supply of agricultural lime to Canterbury's agricultural sector, supporting soil management and productive land use.
    ii. Construction and infrastructure - Supply of track rock for dairy lanes, access roading and associated infrastructure activities.
    iii. Regional economic activity - Continued employment, contractor engagement and expenditure through local processing, transport and supply chains.
    iv. Transport efficiency - Co-location of quarrying and managed fill operations creates opportunities for truck back loading with vehicles delivering suitable material to Whiterock, potentially returning with limestone products. This reduces empty return movements and improves freight utilisation.
    v. Efficient creation and use of the quarry void – Continuation of quarrying creates the physical void required for the managed fill while generating saleable limestone products. The resulting void can then be used for managed fill disposal, reducing the additional earthworks and establishment costs that would otherwise be associated with creating disposal capacity.

Based on the applicant's assessment, the further information response and invited comments, we consider the project will deliver some economic benefits though not directly attributable to the project, such as reserving capacity of other landfill options. We do not consider any such benefits to be of a scale that will deliver significant economic benefits to the region and as such the project **does not satisfy the criterion**. We do not recommend that you refer the project on this basis.

Will support primary industries, including aquaculture [section 22(2)(a)(v)]

The applicant considers the extraction of approximately 55,000 cubic metres (bulked) of lime rock (over the next 10 years to develop the managed fill floor and sides) supports agriculture (in a crushed form this equates to approximately 55,000 tonnes of processed AgLime generally used in fertiliser).

CRC consider that the quarrying operation supports the primary sector through the supply of AgLime, but notes AgLime is supplied by a number of other sites in the vicinity and across the region and does not consider that this establishes a significant regional or national benefit.

	We consider the extraction of lime rock when crushed into a processed form used in fertiliser would support agriculture as a primary industry, but it has not been demonstrated that this would be of a scale that will deliver significant regional or national benefits and as such the project **does not satisfy the criterion**. We do not recommend that you refer the project on this basis. *Will support development of natural resources, including minerals and petroleum [section 22(2)(a)(vi)]* The applicant considers this is achieved through the existing and proposed extraction of the natural limestone resource and processing and developing into a usable AgLime form via rotating kiln crushing facilities on-site. We consider the quarry aspect of the project is an existing operation, and it has not been demonstrated how the proposed extraction volume would support the development of natural resources or be of a scale that will deliver significant regional or national benefits and as such the project **does not satisfy the criterion**. We do not recommend that you refer the project on this basis. *Will support climate change mitigation, including the reduction or removal of greenhouse gas emissions [section 22(2)(a)(vii)]* The applicant considers this will be delivered through shorter haulage distances and consequently lower transport-related emissions compared to alternative disposal locations. We note the application is not supported by an expert report detailing the exact reductions to greenhouse gas emissions. However, we consider the project may support some climate change mitigation from reduced mileage and therefore reduced greenhouse gas emissions but is not considered to be of a scale that will deliver significant regional or national benefits and as such the project **does not satisfy the criterion**. We do not recommend that you refer the project on this basis. *Will address significant environmental issues [section 22(2)(a)(ix)]* The applicant considers the project will address this by diverting inert and low-risk contaminated materials away from higher-specification landfills and reserving those facilities for waste streams requiring greater levels of containment, and by enabling the appropriate containment of contaminated soils and asbestos within a purpose-built facility. We consider the diversion from higher–specification landfills does not demonstrate how the project will address the criterion and deliver significant regional or national benefits and as such the project **does not satisfy the criterion**. We do not recommend that you refer the project on this basis. *Is consistent with local or regional planning documents, including spatial strategies [section 22(2)(a)(x)]* The applicant considers the project is broadly consistent with the strategic direction of the Canterbury Regional Policy Statement, Canterbury Land and Water Plan, Canterbury Air Regional Plan and the Operative Waimakariri District Plan. We consider that at this high–level stage of consideration, it is not sufficiently clear if the project is consistent with the full range of planning documents and as such **does not satisfy the criterion**. We do not recommend that you refer the project on this basis. ***Conclusion*** Overall, we consider the project is an infrastructure project that **does not** have significant regional or national benefits aligned with the criteria for accepting a referral application under section 22(1)(a) of the Act. If you agree with this recommendation and are satisfied the project does not satisfy the criteria in section 22, you **must** decline the referral application in accordance with section 25 of the Act.
Referring the project to the fast-track approvals process [section 22(1)(b)]	*Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes [s22(1)(b)(i)]* The applicant considers referral of the project will materially facilitate its delivery compared with normal processes, by providing a more streamlined, timely and cost–effective determination of approvals for a project that is regionally significant and likely to involve complex and contested issues. The applicant lodged resource consent applications in April 2024, followed by public notification in September 2024, which resulted in 573 submissions (510 in opposition, 57 in support and 6 neutral), of which 89 submitters request to be heard. The application has been on hold following the close of submissions. The applicant considers based on the number of submitters and the breadth of issues raised, there is a high likelihood that any Council-level decision would be subject to appeal to the Environment Court, stages of evidence exchange and mediation. Collectively, these steps can extend the approval timeframe significantly and introduce uncertainty into the delivery of the project. The applicant considers such delays in obtaining approvals will defer the realisation of the project's economic, infrastructure, and environmental benefits. We note WDC state the applicant requested public notification of the resource consent applications that have been progressed jointly through the RMA process with the remaining stage being a hearing and that the Council's section 42A reports (attached to their invited comments) recommend the application be declined. A referral application was subsequently submitted under the Act. While the rights of appeal under the Act are limited compared to the RMA, the advanced state of the RMA consent applications may reduce the applicant's potential time savings from using the fast-track approvals process. We question whether the fast-track approvals process would facilitate the project given the quarry activity is an existing consented operation and also whether the process is a timely consenting pathway, given public notification was sought by the applicant. We do agree that appeal rights are limited and that this would enable the project to be processed in a more timely and cost–effective way than under normal processes. If you decide to refer the project, we recommend that you direct a panel to invite any submitters who requested to be heard in the RMA proceedings to comment on the substantive application. *Is unlikely to materially affect the efficient operation of the fast-track approvals process [s22(1)(b)(ii)]* The applicant states the project is well advanced, being supported by a comprehensive body of technical work, detailed design, environmental assessments, and responses to issues raised through the resource consents process, including submissions and Council officer review. The applicant considers that collectively this evidential foundation and clear identification of key issues will enable focused and efficient assessment by an expert panel. The project can therefore be considered without placing undue demand on the fast-track process or affecting its efficient operation.

	Despite our conclusion that the project does not satisfy the criteria for accepting a referral application under section 22(1)(a) of the Act, we agree with the applicant's assessment that the project application reports are advanced and we consider the project is consistent with infrastructure projects the fast-track approvals process was established for, noting the project is neither novel in the New Zealand context nor beyond the scope of what a panel would typically assess and for these reasons is unlikely to materially affect the efficient operation of the fast–track approvals process.
Reasons to decline	
Minister must decline [section 21(3)]	*You must decline a referral application if:* a. *the application may not be accepted under subsection 1 (meets referral criteria)* – We consider the project **does not meet** the referral criteria under section 22 of the Act. b. *the Minister is satisfied the project involves an ineligible activity* – We have not identified or have not received any comments that identify any ineligible activities included in the project scope. c. *the Minister considers that they do not have adequate information to inform the decision under this section* – We consider you have adequate information to inform your referral decisions. Overall, we consider that the project does not meet the referral criteria under section 22(1) of the Act and on this basis, we recommend that you must decline the application under section 21(3)(a) of the Act. If you disagree with this recommendation and you consider that the project would deliver significant regional or national benefits and does meet the referral criteria under section 22 of the Act, then we will provide you with further advice and an updated notice of decisions.
Minister may decline [section 21(4) and 21(5)(a-h)]	*You may decline a referral application for any other reason, whether or not it meets the criteria in section 22.* *Reasons to decline a referral application under section 21 subsection 4 include, without limitation:* *the project would be inconsistent with a Treaty settlement, Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, Marine and Coastal Area (Takutai Moana) Act 2011, a Mana Whakahono ā Rohe, or a joint management agreement* – No inconsistencies have been identified, including within the section 18 Treaty report or from Māori groups invited to comment. *it would be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts* – Comments received by WDC consider this is the case because the project has previously been lodged with CRC and WDC under the RMA. WDC have attached their section 42A report which recommends that the application be declined based on potentially more than minor adverse effects on indigenous biodiversity, freshwater environments, wetlands, and cultural values. The resource consent applications have been placed on hold since, and the hearing has not commenced with the applicant submitting this referral application instead. WDC consider there is a natural justice expectation that the RMA process should be concluded, enabling the submissions received to be considered and submitters to be heard. We note the level of public interest and have considered whether you should direct a panel to invite comments from the submitters on the notified consent under the RMA, if referred. While we do not consider you should decline the project on this basis, we recommend that you direct a panel to invite the submitters who requested to be heard on the RMA application to comment on any substantive application, if referred. Notwithstanding, we note a panel has discretion to invite comments from any parties it considers relevant. *the project may have significant adverse effects on the environment* – Comments from CRC and WDC indicate that the project may have significant adverse effects. CRC state there are no matters identified that would trigger declining the referral under this section but also notes the RMA application has the potential for significant adverse environmental effects. CRC commented that this referral application includes changes from both the RMA application and the previous referral application, and while the technical updates appear to address some previously identified concerns, CRC's technical experts would need to review the updated proposal in detail to determine whether the amendments reduce the significance of the effects, particularly those relating to terrestrial and aquatic ecology. WDC commented that the project, if not suitably managed, may create significant adverse effects on the environment relating to indigenous biodiversity, freshwater environments, wetlands, and cultural values and whether the mitigation measures are appropriate. WDC consider the potential adverse effects are significant and that the application should be declined under s21(5), thereby allowing the project to continue to be assessed under the RMA. Notwithstanding our earlier conclusion that the project does not meet the criteria under section 22(1)(a) of the Act, we consider that based on the comments received including supporting material such as the Council's section 42A reports and technical reviews, that the project may have significant adverse effects on the environment. This is a potential reason you may decline the referral application. We agree there is a level of uncertainty relating to the significance of the adverse effects, however on balance, we consider that at this high–level stage of consideration it is not sufficiently clear whether the effects are of such significance to decline the referral application on this basis. The applicant retains the ability to provide further analysis on the matters raised to assist a panel in understanding any impediments to delivery of the project. In addition, a panel can seek further information from local authorities and/or the applicant when presented with a comprehensive substantive application, if referred to the fast–track process. *the applicant has a poor compliance history under a specified Act that relates to any of the proposed approvals* – No such history has been noted. *the project area includes land that the Minister for Treaty of Waitangi Negotiations considers necessary for Treaty settlement purposes* – No such land has been identified. *the project includes an activity that is a prohibited activity under the Resource Management Act 1991* – No reports or comments received have indicated any such activity. *a substantive application for the project would have one or more competing applications* – No competing applications have been identified at this stage. We note the EPA is required to check prior to providing a substantive application to the panel convener.

	in relation to any proposed approval of the kind described in section 42(4)(a) (resource consents), there are one or more existing resource consents of the kind referred to in section 30(3)(a) – No such resource consents have been identified, including by the applicant and relevant local authorities. *any other matter* – We have not identified any other matters that would be applicable. Overall, we recommend that you **decline** the referral application under sections 21(4) and 21(5)(c) of the Act.

Appendix 1: Statutory framework summary

1. You are the sole decision maker for referral applications. If you accept a referral application, then the whole or part of the project will be referred to the fast-track approvals process.
2. If a Treaty settlement, the Marine and Coastal Area (Takutai Moana) Act 2011, the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, a Mana Whakahono ā Rohe or a joint management agreement provides for consideration of any document or procedural requirements, you must, where relevant:
    a. give the document the same or equivalent effect through this process as it would have under any specified Act; and
    b. comply with any applicable procedural requirements.
3. You must decline a referral application if:
    a. you are satisfied the project does not meet the referral criteria in section 22
    b. you are satisfied the project involves an ineligible activity (section 5)
    c. you consider you do not have adequate information to inform your decision.
4. You may decline an application for any other reason, including those set out in section 21(5) and even if the application meets the section 22 referral criteria.
5. You can decline an application before or after inviting comments under section 17(1). However, if comments have been sought and provided within the required time frame, you must consider them, along with the referral application, before deciding to decline the application.
6. If you do not decline a referral application at the initial stage you must copy the application to, and invite written comments from:
    a. the relevant local authorities
    b. the Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development
    c. any other relevant portfolio Ministers
    d. the relevant administering agencies
    e. the Māori groups identified by the responsible agency
    f. the owners of Māori land in the project area (if applicable)
    g. you may provide the application to and invite comments from any other person.
7. You can request further information from an applicant, any relevant local authority or any relevant administering agency at any time before you decide to decline or accept a referral application (see section 20 of the Act).
8. However, if further information has been sought and provided within the required time frame you must consider it, along with the referral application, before deciding to decline the application.