

MEMORANDUM OF NEW ZEALAND TRANSPORT AGENCY WAKA KOTAHI ON THE POUND ROAD CHRISTCHURCH INDUSTRIAL SUBDIVISION PROJECT

04 November 2025

1 INTRODUCTION

- 1.1 This memorandum presents the New Zealand Transport Agency (**NZTA**) assessment of the substantive application (**the Application**) submitted by Ngāi Tahu Property Development Holdings (**the Applicant**) for the Pound Road (Yaldhurst Christchurch) subdivision under the Fast Track Approvals Act (**FTAA**) 2024.
- 1.2 The assessment has been prepared in response to an invitation from the Expert Panel (**the Panel**) to provide comment and includes a summary of the preliminary findings relating to transportation.
- 1.3 This assessment is primarily based on the Application materials submitted to the Environmental Protection Authority (**EPA**) and the subsequent correspondence between the Panel, the Applicant, and Christchurch City Council.

2 BACKGROUND

- 2.1 Prior to the lodgement of the substantive Application, the Applicant, and NZTA engaged in preliminary discussions concerning NZTA's interests in the proposed development (a Teams meeting on 19/06/2025) and related correspondence culminating in an NZTA feedback letter explaining NZTA's position and recommendations on the proposal (refer to letter of 09/07/2025 attached in Attachment 1).
- 2.2 It is noted that no mention of these discussions nor record of communications with NZTA was included in the Application documentation.
- 2.3 Furthermore, the Integrated Transport Assessment (**ITA**) supporting the Application is essentially unchanged from that which was provided by the Applicant in draft form for the preliminary NZTA discussions.
- 2.4 While NZTA are not opposed to the development, the supporting documentation (in particular the ITA) raised questions relating to the Pound Road / State Highway 1 intersection and the transport modelling, design practicability, timing and funding assumptions made.

3 ASSESSMENT

- 3.1 In the context of the above background discussion and the unchanged transportation assessment supplied for the substantive application the concerns outlined in NZTA's original feedback have not been addressed. These matters should be addressed fully within a revised ITA.
- 3.2 The issues that NZTA wish to comment on are:

- The traffic modelling, design feasibility, timing and funding matters related to the Pound Road / State Highway 1 intersection.
- The Pound Road / State Highway 1 intersection capacity, rail level crossing safety, and the need to account for higher heavy vehicle volumes and residual queue effects.
- While this intersection does not abut the site, traffic effects generated by the proposed subdivision have potential downstream impacts on this intersection and ultimately on the safe and efficient distribution of traffic in the wider area, and on the efficient function of the wider regional economy.

General Considerations

- 3.3 In the context of the wider Christchurch transport network any significant reduction in the safety and efficiency of Pound Road / State Highway 1 intersection has significant implications for the safety and efficiency of the wider transport network and ultimately for the Christchurch economy. Pound Road intersects with three key strategic transport corridors State Highway 1, Waterloo Road and the rail corridor.

Transportation Planning / Network Performance

- 3.4 The supporting ITA is key to understanding the ultimate consequences of the proposed development for this important local network and understanding any necessary interventions needed to mitigate adverse effects. NZTA have examined this document and identified weaknesses in the foundational transportation modelling inputs on which it is based. NZTA considers that the conclusions drawn within the ITA are based on data that is dated and not comprehensive enough to warrant the conclusions drawn on reductions in levels of service and traffic safety arising from the project. (Refer to Attachment 1 for NZTA's concerns related to the draft ITA assessed by it in June / July of this year).
- 3.5 The gaps in the ITA leave unanswered a range of questions about the implications for the Pound Road / State Highway 1 intersection capacity, rail level crossing safety, and the potential need to account for higher heavy vehicle volumes than anticipated within the ITA. and residual queue effects.
- 3.6 Given the proximity of the three Pound Road intersections at issue (Waterloo Road, then the rail corridor, then State Highway 1) and the incidence of queuing across them already, there is the risk that the back propagation of queuing across these intersections could be exacerbated by the development and seriously affect the safe and efficient function of these interdependent intersections.
- 3.7 Given Pound Road's additional function as a bypass route, when other elements of the network are under pressure, it is also easy to appreciate the potential for an additional compounding effect of this queuing on the wider network.
- 3.8 NZTA have also emphasised the need for consultation with KiwiRail on effective mitigation for queuing affecting the safe and efficient operation of the rail line.
- 3.9 Clarity on the scope and scale of this issue is lacking and can best be rectified with the comprehensive modelling inputs suggested by NZTA. While the ITA acknowledges that the full build out of the proposed development will have implications for the network that require intersection improvements, without clarity on

the scope, scale, and pace of growth in traffic demand that would be supplied by adequate additional modelling, these conclusions are necessarily uncertain.

3.10 Furthermore, the intersection design solutions proffered within the ITA have been examined by NZTA and are considered to lack the necessary detailed design support to:

- Establish the necessary form and function of any intersection upgrades; and
- Establish whether there is sufficient space to accommodate them.

3.11 As a result, NZTA consider that additional work is required within the ITA to clarify this matter.

Funding and Timing

3.12 NZTA standard practice on intersection upgrade funding is that an applicant needs to mitigate effects generated by its proposal. In this case, to mitigate adverse traffic effects, either created or significantly worsened, by the growth in traffic demand generated by the development to the intersection of Pound Road / State Highway 1.

3.13 The suggested timing condition from the Applicant noted in the ITA anticipates the deferment of title issue from the subdivision until 2027 to allow NZTA to build any necessary intersection upgrades. This condition is contrary to NZTA standard practice and is based on the undemonstrated assumption that the Pound Road / State Highway 1 intersection is currently in need of an upgrade.

3.14 Furthermore, there are currently no planned upgrades to the Pound Road / State Highway 1 and NZTA would be unable to prioritise any upgrade within the timeframes anticipated by the condition.

3.15 NZTA considers that the title issue timeframe suggested by the Applicant is unworkable without some constraint built into it to link site use and development to the funding and implementation of any required intersection upgrade or part thereof attributable to the growth in traffic demand created by the development.

3.16 Given that this development is not anticipated to be fully built out before 2038, NZTA requires input into the development of an acceptable review condition in the subdivision conditions covering:

- The establishment of side agreement between the Developer and NZTA for the funding of any intersection upgrades necessitated by the development.
- Timing title release for each of the four anticipated stages within this development until the intersection upgrading necessary to mitigate the effects generated by each stage is completed.

4 Conclusion

4.1 In summary, While NZTA are not opposed to the Application, NZTA has identified areas where further information is required to understand the effects of the Application. Although NZTA has had discussions with the Applicant to ensure that the assessment supporting the Application is robust, and that all relevant transport matters will be addressed, this information has not been provided.

4.2 NZTA is willing to discuss these issues with the Applicant and provide further information to the Panel as it becomes available. As there is a need for further assessment to be undertaken by the Applicant, NZTA has not yet proposed detailed changes to the draft consent conditions but intends to comment on those prepared by the Panel. However, NZTA would seek to have input into a modified review condition to ensure that anticipated

traffic effects generated by each of the four proposed subdivision stages are mitigated prior to the release of titles for that stage.

- 4.3 In addition, NZTA would seek to ensure that provision for the negotiation of an acceptable side agreement between the Applicant and NZTA covering intersection upgrade contributions where necessary is provided for within the conditions.
- 4.4 NZTA seeks that the Panel requests further information from the Applicant on the above points and directs them to continue engagement with NZTA.

**Attachment 1 – NZTA Pre-Application Comment. Ngai Tahu, Proposed Fast Track Application – Pound Road
Industrial Subdivision / Development**

NZ Transport Agency Waka Kotahi Reference: Fast Track Pre-Application Comments-Ref 2025-670

9 July 2025

Jeremy Phillips

Sent via Email: [REDACTED]

Dear Jeremy,

Pre-Application Comment. Ngai Tahu, Proposed Fast Track Application – Pound Road Industrial Subdivision / Development

Thanks for the opportunity to engage with your team on this project. A project with the potential to make a substantial contribution to the expansion of industrial capacity in the Christchurch region.

It was good to sit down with your team, albeit virtually, to address points raised in NZTA 's preliminary memo and explore our common ground and differences of opinion. What quickly became apparent was that your team had little disagreement with the wider implications of the project raised in our memo and were focussed on mitigations for effects pertaining to the Pound Rd / State Highway 1 intersection. Reflected also in your emailed summary of your perspective of outcomes from our meeting of Thursday 19th of June.

On the broader transportation effects of the project, it is our intention is to share these with our Christchurch City Transportation counterparts as many of these are relevant to their sphere of operations.

To turn now to the meeting outcomes pertaining to the Pound Rd / SH 1 as reported by you in your email of 27th June 2025. I have addressed these by interleaving our responses point by point. (In italics)

1. We understand that the issue of relevance for NZTA is the performance of this intersection and the extent to which traffic from the proposal (estimated to be 856 vehicle movements per hour in the AM peak, 780 vehicles per hour in the PM peak and 9,736 vehicles per day) will affect its safe and efficient operation.

NZTA in its wider role as provider and part funder of safe and efficient NZ road transport networks affirms all points raised in our memo as being of relevance in the context of this application. Including the safe and efficient function of the Pound Road / SH 1 intersection.

2. As discussed, traffic modelling has been undertaken by QTP Limited as part of Novo Group's transport assessment for the application and in order to understand the existing operation of the network and the performance of the network in 2038 without the development (baseline) and with the development. The modelling indicates that existing queuing on the Pound Road approach to SH1 across the rail corridor affects the capacity of the Pound Road / Waterloo Road signals, and as described by Mr. Fuller at the meeting this is an existing safety concern that currently warrants consideration of an upgrade. We understand from James that NZTA acknowledge this.

NZTA acknowledge there are reports of queues extending across the level crossing. This is caused by both the NZTA and CCC intersections. NZTA did not state / acknowledge that the intersection of SH1 / Pound Rd warrants an upgrade at this time. I refer back to the NZTA memo on suggested improvements to the applicant's traffic modelling and design detail to better understand the transportation issues at this intersection.

3. The modelling also indicates that in 2038 (without the development), this intersection will be operating with further delays, with a Level of Service (LoS) E in the AM peak and D in the PM peak. Therefore, the development and associated increase in traffic generation will further impact on this existing issue.

Mr. Fuller noted that to address existing and future capacity and safety concerns, an additional right turn lane from Pound Road to SH1 and an additional southbound lane on Pound Road to Waterloo Road would be required. It was also clarified that no additional lanes are required on SH1 itself, as the additional Pound Road lanes provide sufficient additional capacity at the intersection as a whole.

We noted that it is unclear when exactly (between now and 2038) this upgrade would be required, but in order to provide sufficient time for NZTA to plan, fund and implement the upgrade, a consent condition is to be proposed (volunteered) as part of the Fast Track application that precludes the issuing of titles for any lots within the development until 31 December 2027 in order to sufficiently delay subsequent site development and traffic.

NZTA emphasised that the general principle underlying its standard practice in these circumstances is for the developer to mitigate effects generated by its proposal. As such the abovementioned condition is not fit for purpose. Furthermore, while avenues exist within the NLTP, and RLTP framework for the applicant to advance the case for intersection upgrades there is currently no way for NZTA to prioritise any upgrade within the time frames anticipated by the condition.

4. We understood (from James), that the additional right turn lane from Pound Road to SH1 and additional southbound lane on Pound Road to Waterloo Road could be implemented within the boundaries of the designation and land owned by NZTA / Council (no land acquisition or designations required), and therefore this design solution should be relatively easy to implement, and therefore timing and funding are the key issues from NZTA's perspective.

This assumption is based on the plan provided by Novo group – NZTA has not independently verified that sufficient room exists within current road boundaries for the required intersection upgrades. Furthermore, the plan provided does not actually show it is possible to accommodate two vehicles tracking side by side in the intersection area which would be critical to the proposed layout actually functioning and mitigating any effect,

5. In terms of timing, we understand NZTA wants to ensure that any design solution can be implemented within an appropriate timeframe, accounting for when the development will generate traffic. We understood from James that the proposed delay to the issue of titles (as noted in the condition described above) was likely to be sufficient for NZTA.

James stated that NZTA could not undertake any design in this NLTP (2024-2027). There followed some discussion around the rate of development and that development wasn't likely to be complete / at 100%, until around 2038. NZTA considers that the title issue time frame is unworkable without some constraint built into it via an acceptable side agreement between the Developer and NZTA to link site use and development to the funding and implementation of any required intersection upgrade.

6. In terms of funding, we understand that NZTA want to ensure that the developer/applicant (NTP Development Holdings Limited) pays its appropriate share of costs for mitigating its impacts on this intersection. We noted that as this intersection requires an upgrade irrespective of this development, the principal cost imposed by the applicant would be the potential bringing forward of works that might not otherwise be required until 2038 (at the latest) and that this entails a financing cost (in terms of the cost of bringing forward funding).

Based on NZTA comments on points 3 to 5 above, NZTA is not in agreement with the inferences made and conclusions drawn in this comment.

7. Other parts of the road network (beyond the State Highway and intersection noted above) are within the jurisdiction of the Council and in that regard, the applicant has engaged / is engaging with Council transport staff on the relevant matters.

Noted

8. Any additional upgrade works at the Pound Road /SH1 intersection (e.g. a fourth arm to service development to the south), is uncertain and speculative at this time.

Agreed

9. KiwiRail interests in this intersection and their rail corridor should be addressed directly to/with KiwiRail.

Agreed, noting contact details for KiwiRail have been passed to Nick Fuller – Novo Group

Conclusion

Once again, thank you for the opportunity to have some early input into this significant proposal. We hope that the input offered will be of assistance in optimizing your proposal and mitigating any potential adverse transport related effects on the Christchurch transport network.

However, to do so, the developer must mitigate the adverse transport effects generated by the development. In the absence of any wider programmed upgrade works at the Pound Road / SH 1 intersection, for the foreseeable future, any intersection upgrade or part thereof, necessary to mitigate the effects of the development, is the financial responsibility of your client.

If you have any queries regarding the above or wish to discuss matters further, please feel free to contact the Environmental Planning team at environmentalplanning@nzta.govt.nz.

Yours sincerely,

B.W.Hawkins

Bruce Hawkins

Senior Planner

Poutiaki Taiao / Environmental Planning, System Design, on behalf of NZ Transport Agency Waka Kotahi.

Enclosed:

- Attachment 1: Initial NZTA Commentary
- Attachment 2: Applicant Response

Attachment 1 Initial NZTA Commentary

NZTA SME input: Pound Road Fast Track – Application. 16/06/2025.

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A. Overview Considerations

1. This proposed development needs to mitigate the issues it will either create or significantly worsen at the intersection of SH1 and Pound Road.
2. Pound Road a busy component of the local transport network intersecting with three key strategic corridors SH1, Waterloo Road, Rail Corridor – all of which are sensitive to the traffic implications of this project.
3. Pound Road is crucial to movement along the western fringe of Christchurch, and increasingly used (as seen by counts) including many trucks all the way to Sawyers Arms.
4. I am not convinced that CCC fully appreciate this significance and may not be protecting the throughput as well as they should.
5. Freight efficiency is a key government objective, and the suggestion of a roundabout (on Pound Rd) to reduce the sites exit delays has a much bigger "environmental effect" on freight users. (do their benefits outweigh the additional 15-30 seconds delay for other users, including freight on Pound Road?)
6. Not forgetting risks of other downstream impacts on rail crossings and SH intersections.
7. If a roundabout is agreed it needs to be big for efficient freight, example below further along Pound Road (Buchanan Road).
8. Interestingly the other intersection accesses into Islington Industrial are all priority controlled but they will presumably reach a time for upgrade.
9. Multiple intersections on Pound Road will degrade the wider efficiency
10. There is a longer-term plan to have a fourth leg at Pound/SH1 into the Hornby industrial development
11. Pound Road also performs a valuable by-pass role when other elements of the network are under pressure.
12. We know that SH1 at this intersection is constrained by land boundaries and there is no room for widening of SH1.
13. Concerned that concept design in Attachment 3 will not work due to this constraint.
14. Concerns with the proposed two right turn lanes out of Pound Road for side-by-side truck movements. (or even the lesser car and truck side by side) It may not be a solution and queuing back over the rail level crossing will be a serious safety concern.
15. The need for the applicant to include KiwiRail in this proposal given the complex interactions between the 3 Pound Road intersections, Waterloo, Railway, State Highway 1. (Queuing across intersections, lane provision, signal interaction effects on network safety and performance)
16. Changes to phasing is the only solution available for Right Turns from SH1 to Pound Road, this has potential flow on affects.

B Transportation Planning / Network Performance

1. SH1 / Pound Road Intersection Performance
 - I. The SIDRA outputs cover multiple sites and scenarios, including current and 2038 projections.
 - II. Without improvements, the SH1/Pound Road intersection shows deterioration to LOS D/E/F, particularly for right-turns from side roads. E.g., the right turn from Pound Road to SH1 in the AM peak hits 395 seconds delay, LOS F.
 - III. With intersection upgrades (e.g. additional turning lanes and a roundabout), LOS improves to B-C across most approaches, with right-turn delays reducing to 12-14 seconds.
 - IV. Opportunity for sensitivity analysis in the modelling
 - V. SIDRA confirms that intersection upgrades are essential to achieve acceptable performance.

2. Truck Turning Geometry and SH1 Layout Concerns

- I. While the modelling highlights delay and LOS, it does not include any assessment of vehicle tracking or side-by-side heavy vehicle turning feasibility.
- II. Attachment 3, which includes layout point, doesn't show turning paths or verify if large vehicles (e.g. semi-trailers or B-doubles) can safely perform movements at the SH1/Pound Road intersection given the industrial nature of the development.
- III. We have had a few issues with trucks turning left into Pound Rd from SH1. The current width is not sufficient to clear the TS infrastructure with poles being hit on numerous occasions. Consideration of this issue needs addressing when the extra RT lane is added.
- IV. I recommend including a vehicle tracking assessment to ensure operational functionality and safety under heavy vehicle demand.
- V. Over dimension truck loads
- VI. With the additional right-turn lane, is there still an opportunity for a left-turning vehicle to proceed simultaneously? Currently, the phasing allows the left turn to run at the same time as the right turn out. Not allowing the LT to run at the same time as Pound Road would reduce the LOS for the LT.
- VII. With the additional width required (for the new lane), are we still able to accommodate the cycle lanes?
- VIII. What happens when the fourth arm gets built on Pound Road? With a dual right-turn lane, we will need to operate the Pound Road approaches as split approach phasing, which is very inefficient. This would likely increase the delay significantly.
- IX. What happens if/when? Pound Road is converted to be the state highway? This would have a significant impact on traffic volumes.
- X. Also, what happens if the light rail/bus rapid transport goes ahead and the section of road at Homby Mall is closed to through traffic? This would shift more traffic onto Pound Road. I'm not sure how likely this is, but I know it is being looked into.
- XI. I would be interested to know what happens to the Pound/Yaldhurst roundabout, as I know that it currently has large queues. More traffic on here might push this over its capacity and require signalling?

3. Rail Level Crossing Safety

- I. Section 3.5 notes queueing over the railway crossing (up to 225m), and the memo flags this as an existing safety concern.
- II. However, the report does not quantify how queueing will worsen post-development nor propose any specific mitigation.
- III. SIDRA data shows 95% queues > 100m on some approaches (such as Pound Road RT Lanes), reinforcing the potential for spillback over the rail.
- IV. I would suggest assessing the risk at level crossing, considering its proximity (within 100m) to SH1. This should include engagement with KiwiRail and propose mitigation measures.

4. Trip Distribution

- I. The trip distribution is based on similar zones (e.g. Waterloo Park), but it is unclear how comparable these are in terms of land use types, operational profiles, or heavy vehicle intensity.
- II. The 2:1 PCU assumption for HCV is standard. Slight changes in heavy vehicles assumptions can have big impacts on LOS, especially at constrained intersections. If the Fast Track site has more logistics-based tenants, the peak hour HCV percentage would exceed estimates, invalidating the intersection performance claims.
- III. Suggest including considering higher HCV volumes, especially during peak hours.

5. Wider Network Impacts and Residual Congestion

- I. The modelling suggests SH1 west of Pound Road will exceed capacity by 2038, even with the proposed improvements.
- II. There is potential for congestion to back-propagate into the site, particularly at SH1 / SH76 and SH1 / Waterloo.
- III. Pound Road / Waterloo, SH1 / Pound Road, and the rail crossing are functionally interdependent. Queueing at one intersection will likely influence operations at the other intersections.
- IV. I recommend analysing signal phasing integration and blockage effects more holistically and consider residual queueing effects on internal site access and egress points.

6. Resilience of Access and Incident Response

- I. SH1 is a critical freight and regional route. Alternative routes (e.g. Pound Road or Waterloo) are limited by geometry and rail conflict.
- II. In the event of incidents or maintenance on SH1, lack of detour options could lead to delays, particularly if the project adds further volume to this corridor.

Bruce Hawkins

Senior Planner

Environmental Planner

Attachment 2 Applicant Response

RE: Pound Road Fast Track Consent - Meeting re NZTA matters



Bruce Hawkins

To: Jeremy Phillips

Cc: Nick Fuller; James Long



Pound Road Final Input Letter.docx
75 KB

To: Bruce Hawkins; ; James Long;
Cc: Georgia Brown; ; Nick Fuller; ; Dean Christie;
Subject: Pound Road Fast Track Consent - Meeting re NZTA matters

Some people who received this message don't often get email from jeremy@novogroup.co.nz. [Learn why this is important](#)

Hi Bruce and James

Thanks for your time last Thursday (18 June) regarding the Pound Road Fast Track Consent application and the matters of relevance to NZTA and in particular, its management of the Pound Road / State Highway 1 intersection.

We understand that the issue of relevance for NZTA is the performance of this intersection and the extent to which traffic from the proposal (estimated to be 856 vehicle movements per hour in the AM peak, 780 vehicles per hour in the PM peak and 9,736 vehicles per day) will affect its safe and efficient operation.

As discussed, traffic modelling has been undertaken by QTP Limited as part of Novo Group's transport assessment for the application and in order to understand the existing operation of the network and the performance of the network in 2038 without the development (baseline) and with the development.

The modelling indicates that existing queuing on the Pound Road approach to SH1 across the rail corridor affects the capacity of the Pound Road / Waterloo Road signals, and as described by Mr. Fuller at the meeting this is an existing safety concern that currently warrants consideration of an upgrade. We understand from James that NZTA acknowledge this.

The modelling also indicates that in 2038 (without the development), this intersection will be operating with further delays, with a Level of Service (LoS) E in the AM peak and D in the PM peak. Therefore, the development and associated increase in traffic generation will further impact on this existing issue.

Mr Fuller noted that to address existing and future capacity and safety concerns, an additional right turn lane from Pound Road to SH1 and an additional southbound lane on Pound Road to Waterloo Road would be required. It was also clarified that no additional lanes are required on SH1 itself, as the additional Pound Road lanes provide sufficient additional capacity at the intersection as a whole.

We noted that it is unclear when exactly (between now and 2038) this upgrade would be required but in order to provide sufficient time for NZTA to plan, fund and implement the upgrade, a consent condition is to be proposed (volunteered) as part of the Fast Track application that **precludes the issuing of titles for any lots within the development until 31 December 2027 in order to sufficiently delay subsequent site development and traffic.**

We understood (from James), that the additional right turn lane from Pound Road to SH1 and additional southbound lane on Pound Road to Waterloo Road could be implemented within the boundaries of the designation and land owned by NZTA / Council (no land acquisition or designations required), and therefore this design solution should be relatively easy to implement, and therefore timing and funding are the key issues from NZTA's perspective.

In terms of timing, we understand NZTA wants to ensure that any design solution can be implemented within an appropriate timeframe, accounting for when the development will generate traffic. We understood from James that the proposed delay to the issue of titles (as noted in the condition described above) was likely to be sufficient for NZTA.

In terms of funding, we understand that NZTA want to ensure that the developer/applicant (NTF Development Holdings Limited) pays its appropriate share of costs for mitigating its impacts on this intersection. We noted that as this intersection requires an upgrade irrespective of this development, the principal cost imposed by the applicant would be the potential bringing forward of works that might not otherwise be required until 2038 (at the latest) and that this entails a financing cost (in terms of the cost of bringing forward funding).

To the extent that other issues were discussed at the meeting:

1. Other parts of the road network (beyond the State Highway and intersection noted above) are within the jurisdiction of the Council and in that regard, the applicant has engaged / is engaging with Council transport staff on the relevant matters.
2. Any additional upgrade works at the Pound Road / SH1 intersection (e.g. a fourth arm to service development to the south), is uncertain and speculative at this time.
3. Kiwirail's interests in this intersection and their rail corridor should be addressed directly to Kiwirail.

We would be grateful for your confirmation that the record above accurately reflects the matters discussed and agreed at the meeting and that this covers the principal issues of relevance to NZTA.

Please note that we are aiming to lodge the application with the EPA on the 11/07/2026, so we would appreciate a response prior to that date if possible.

Kind regards,

Jeremy

Jeremy Phillips
Director - Senior Planner

D:

C:

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