

Before the Expert Panel

**FTAA-2505-1057**

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Under	Fast-track Approvals Act 2024 ( <b>FTAA</b> )
In the matter of	Pound Road Industrial Development
Between	<b>NTP DEVELOPMENT HOLDINGS LIMITED</b>
	Applicant

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**Memorandum of counsel accompanying the Applicants reply under s 55 of the FTAA**

Date: 19 December 2025

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**anderson  
lloyd.**

## May it please the Panel

- 1 This memorandum relates to the substantive application for the Pound Road Industrial Development [FTAA-2505-1057] (**Application**) by NTP Development Holdings Limited (**NTP** or **Applicant**) for all necessary approvals to enable the subdivision and development of industrial lots. These involve:
  - (a) resource consents that would otherwise be applied for under the Resource Management Act 1991 (**RMA**); and
  - (b) an authority that would otherwise be applied for under the Wildlife Act 1953 (**WA**).

## Introduction

- 2 The Application was included as a listed project in Schedule 2 of the Fast-track Approvals Act 2024 (**FTAA**). The expert Panel commenced on **15 September 2025**, noting that for the purpose of section 53, the commencement date is **22 September 2025**.
- 3 The Panel called for comments on **6 October 2025**. Pursuant to s 51, the Director-General of Conservation provided their report on **20 October 2025**. Pursuant to s 54 of the FTAA, comments were received by **4 November 2025** from 16<sup>1</sup> parties in relation to the Application. Late comments were also received from KiwiRail on **14 November 2025**.
- 4 This memorandum has been prepared to accompany the Applicant's response to comments under s 55 of the FTAA. A detailed planning assessment and the reports of the relevant experts are appended to these and are referred to throughout this memorandum, including:
  - (a) **Appendix 1:** Georgia Brown, Novo Group Limited, Pound Road Industrial Development Applicant Section 55 response – Planning;
  - (b) **Appendix 2:** CCC Land Use and Subdivision Conditions, and DOC Wildlife Conditions;

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<sup>1</sup> Game Animal Council (1); Minister of Treaty of Waitangi negotiations & Culture and Heritage (2); Minister for the Environment (3); Minister of Infrastructure (4); Whitiara Centre Limited (5); Cass Jones & Gemma McLaughlin (6); Canterbury Aoraki Conservation Board (7); Carey Jones (8); Canterbury Regional Council (9); John and Philippa Borlase (10); Minister of South Island and Associate Minister of Transport (11); Warich and Marianne Right (12); Department of Conservation (13); Ara Poutama Aotearoa (the Department of Corrections) (14); Christchurch City Council (15); NZ Transport Agency (16).

- (c) **Appendix 3:** CRC Land Use, Water Permit and Discharge Conditions, and email correspondence confirming agreement of the conditions;
  - (d) **Appendix 4:** Nick Fuller, Novo Group, Transport Memo Response Memo;
  - (e) **Appendix 5:** Todd Inness, Davie Lovell Smith, Civil Engineering Response Memo;
  - (f) **Appendix 6:** Natalie Hampson, Savvy Consulting, Economics Response Memo;
  - (g) **Appendix 7:** Laura Drummond, Stantec, Aquatic Ecology Response Memo;
  - (h) **Appendix 8:** Samantha King, Wildlands, Lizard Management Plan and Terrestrial Response;
  - (i) **Appendix 9:** Anne Wilkins, Novo Group, Landscape and Visual Response Memo;
  - (j) **Appendix 10:** Email correspondence with the Department of Corrections; and
  - (k) **Appendix 11:** Anderson Lloyd Memorandum on the applicability of the National Policy Statement on Highly Productive Soils.
- 5 A complete list of the reports prepared by the Applicant's expert consultants is provided in **Attachment 1**.
- 6 We note that comments were received from Warwick and Marianne Wright, owners of 111 Pound Road, which forms part of the Application Site. The Wrights have a commercial agreement with the Applicant and have agreed to the inclusion of their land in the Application. While the Applicant has addressed their comments in full in its section 55 response, we caution the Panel against placing significant weight on their submission for this reason.

### **General legal context under the FTAA**

- 7 The FTAA was passed in December 2024. Recent changes to the Act were made by the Fast-track Amendment Act 2025 (**Amendment Act**) on 16 December 2025, which changed some provisions governing the Panel's consideration of the Application.<sup>2</sup> For the avoidance of doubt, these

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<sup>2</sup> Including amendments / insertion of s 60, 62 – 66, 81, 84A and clause 20 of Schedule 11.

provisions are outlined in **Attachment 2** to these legal submissions and have been considered in the analysis below.

- 8 The purpose of the FTAA is "*to facilitate the delivery of infrastructure and development projects that provide significant regional or national benefits.*"<sup>3</sup> In meeting this purpose, the FTAA establishes a single process for obtaining multiple approvals that would otherwise require separate applications under different statutes.<sup>4</sup> The approvals sought by the Applicant fall within this framework.
- 9 Under s 81(1), for each approval sought by the Applicant, the Panel must decide whether to grant the approval, set any conditions to be imposed on the approval; or decline the approval. For the purpose of making the decision, under s 81(2) the expert Panel:
- (a) must consider the substantive application and any advice, report, comment, or other information received by the Panel under section 51, 52, 53, 55, 58, 67, 68, 69, 70, 72, or 90:  
...
  - (b) must apply the applicable clauses set out in subsection (3) (see those clauses in relation to the weight to be given to the purpose of this Act when making the decision):  
...
  - (d) must comply with section 83 in setting conditions:  
...
  - (ea) may impose conditions under section 84A:
  - (f) may decline the approval only in accordance with section 85.
- 10 Section 81(3) refers to the FTAA schedules, which set out specific decision-making criteria for the different types of approvals. These criteria are discussed later in relation to the approvals sought by the Application. In general, the schedules require the Panel to consider a list of factors, starting with the "purpose of the Act," and direct the Panel to give the greatest weight to that purpose.

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<sup>3</sup> Fast-track Approvals Act 2024, s 3.

<sup>4</sup> Fast-track Approvals Act 2024, s 42.

- 11 Section 81(4) provides that:

When taking the purpose of this Act into account under a clause referred to in subsection (3), the Panel must consider the extent of the Project's regional or national benefits.

- 12 Section 81(6) further provides that:

Despite subsection (2)(a), the panel –

(a) is not required to consider any advice, report, comment, or other information it receives under section 51, 53, 55, 67, 69, 70, or 72 after the applicable time frame; but

(b) may, in its discretion, consider the information as long as the panel has not made its decision under this section on the approval.

*Section 83 – Conditions must be no more onerous than necessary*

- 13 Section 83 provides that:

When exercising a discretion to set a condition under this Act, the Panel must not set a condition that is more onerous than necessary to address the reason for which it is set in accordance with the provision of this Act that confers the discretion.

- 14 In practice, each condition must be clearly linked to its purpose and supported by evidence. If the same or similar outcome can be achieved with a less restrictive measure, the more onerous option cannot be imposed. Conditions that impose unnecessary costs, complexity, or operational limitations would not comply with section 83 of the FTAA.

*Section 84A – Conditions relating to infrastructure*

- 15 Section 84A has been introduced via the Amendment Act with immediate legal effect regarding substantive applications currently being processed under the FTAA, including the Application.

- 16 Section 84A of the FTAA provides that:

(1) The Panel may set conditions to ensure that the infrastructure in the project area or other infrastructure the Project will rely on is or can be made adequate to support—

(a) the Project; or

(b) the stage of the Project to which the application relates.

(2) This section applies in addition to, and does not limit, any other powers to set conditions under this Act.

(3) To avoid doubt, a condition set under this section may impose an obligation on the applicant only.

- 17 Section 84A enables Panels to grant approvals where it is satisfied that, on the evidence, infrastructure "can" be provided, allowing projects to proceed without being unduly delayed by current capacity constraints. In practice, this will often be a condition that allows a reasonable time (albeit in the context of facilitating the delivery of a project with nationally or regionally significant benefits) for third parties to put infrastructure in place.

#### Section 85 – When Panel must or may decline approvals

- 18 A Panel may only decline an approval where the clauses set out in section 85 of the FTAA are met.

- 19 Section 85 of the FTAA provides that:

(3) A panel may decline an approval if, in complying with section 81(2), the Panel forms the view that—

(a) there are 1 or more adverse impacts in relation to the approval sought; and

(b) those adverse impacts are sufficiently significant to be out of proportion to the projects regional or national benefits that the Panel has considered under section 81(4), even after taking into account—

(i) any conditions that the Panel may set in relation to those adverse impacts; and

(ii) any conditions or modifications that the applicant may agree to or propose to avoid, remedy, mitigate, offset, or compensate for those adverse impacts.

(4) To avoid doubt, a panel may not form the view that an adverse impact meets the threshold in subsection (3)(b) solely on the basis that the adverse impact is inconsistent with or contrary to a provision of a specified Act or any other document that a panel must take into account or otherwise consider in complying with section 81(2).

(5) In subsections (3) and (4), adverse impact means any matter considered by the Panel in complying with section 81(2) that weighs against granting the approval.

- 20 Section 85(4) means that non-compliance with, say, avoidance policies that might preclude the granting of an approval under the RMA is not, in itself, fatal to an application.<sup>5</sup>
- 21 Consistent with the approach adopted by other Panels, the Applicant considers that the exercise provided for by s 85(3) requires an assessment of:
- (a) The extent of the Application's regional or national benefits;
  - (b) The significance of adverse impacts; and
  - (c) Whether the adverse impacts are 'sufficiently significant' to be out of proportion to the Applications' regional or national benefits after allowing for mitigation provided through conditions or modifications.
- 22 The s 85(3) test and the decision-making criteria in the Schedules require a weighing of incommensurables (at its most general, between economic benefits and environmental impacts) which, at least sometimes, is likely to involve something akin to the overall judgment approach.

### Evaluation of the Applications Effects

- 23 The Applicant submitted an in-depth analysis of all effects associated with the Application when the application was lodged. **Ms Georgia Brown** has provided a planning response in **Appendix 1** on the effects, which essentially coordinates technical inputs from other experts within NTP's team in response to comments from the s 53 parties.<sup>6</sup>
- 24 Importantly, as discussed by **Ms Brown**, the cumulative adverse impacts from the Application do not reach the threshold of "sufficiently significant" such that they would be out of proportion to the Application's regional benefits in terms of an assessment under s 85 of the FTAA.<sup>7</sup>
- 25 A table has been attached as **Attachment 3** to this memorandum, which summarises the potential adverse impacts from the Application, considering the Applicant's proposed conditions or modifications that the

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<sup>5</sup> For an example of a consent being refused on this basis, see *Environmental Defence Society Incorporated v The New Zealand King Salmon Company Limited & Ors* – [2014] NZSC 38; [2014] 1 NZLR 593.

<sup>6</sup> Appendix 1: Georgia Brown, Novo Group Limited, Pound Road Industrial Development Applicant Section 55 response – Planning.

<sup>7</sup> Appendix 1: Georgia Brown, Novo Group Limited, Pound Road Industrial Development Applicant Section 55 response – Planning at [133].

Applicant may agree to or propose to avoid, remedy, mitigate, offset, or compensate for those adverse impacts.

- 26 The effects, including how these can be appropriately avoided, remedied and mitigated, offset or compensated, have primarily been agreed upon between the parties, including the relevant administering agencies. We discuss discrete issues on which the parties remain in disagreement.

#### *Traffic and Extent of Transportation Upgrades*

- 27 Comments received under s 53 in relation to transport effects have been assessed by **Mr Nick Fuller** in **Appendix 4**.<sup>8</sup>
- 28 Importantly, no party providing s 53 comments has produced transport modelling contradicting **Mr Fuller** or QTP, noting that the CAST model used is the Council's and NZTA's standard tool.<sup>9</sup>
- 29 The key point is that the effects of the Application and mitigation methods are generally not in dispute between the Applicant, NZTA and CCC; instead, any disagreement relates solely to the funding and timing of the relevant upgrades. The following provides a summary of the upgrades:<sup>10</sup>
- (a) **Barters Road and Hasketts Road Upgrades:** The Applicant accepts the need to upgrade Barters Road and Hasketts Road to meet CCC Infrastructure Design Standards (**IDS**) requirements. It is proposed that the Applicant upgrade only the frontage side of these roads, with the opposite side to be upgraded by Council or via a cost-sharing agreement. This approach aligns with standard subdivision practice and recognises that upgrading both sides would impose disproportionate costs on the Applicant, given that these roads currently do not meet the requirements of the IDS;
  - (b) **Pound Road Shoulder Widening:** Council requests shoulder widening along the Pound Road frontage. The Applicant agrees to fund widening where Pound Road is realigned, associated with the site access roundabout, as this is directly related to the development. For the remaining section, a cost-sharing arrangement is proposed, as the works are required to address an existing deficiency: shoulder widening through this segment is already required by existing traffic volumes on Pound Road. The widened shoulders will be marked as

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<sup>8</sup> Appendix 4: Nick Fuller, Novo Group, Transport Memo Response Memo.

<sup>9</sup> Appendix 1: Georgia Brown, Novo Group Limited, Pound Road Industrial Development Applicant Section 55 response – Planning at [50].

<sup>10</sup> Appendix 4: Nick Fuller, Novo Group, Transport Memo Response Memo at [5].



cycle lanes, consistent with Austroads guidance for a 60 km/h environment;

- (c) **Stage 1 Shared Path Route:** Shared path is proposed from Stage 1 of the development to the Waterloo Road / Pound Road intersection, with amendments to the crossing to accommodate both pedestrians and cyclists. This addresses CCC's request for improved active mode connections to public transport and the wider network; and
  - (d) **Pound Road / SH1 & Pound Road / Waterloo Road Upgrades:** The Applicant acknowledges Council's and NZTA's concerns about the timing and certainty of intersection upgrades. The Applicant is willing to enter into a developer agreement, with contributions proportionate to the development's traffic effects. This approach provides flexibility for future intersection arrangements and aligns with the outcomes of the Hornby Strategic Case Study (**HSCS**).
- 30 Across each of these transport matters, the consistent theme is that the Applicant accepts responsibility for addressing the direct effects of the development, while providing fair and proportionate contributions for works that remedy existing network deficiencies.
- 31 In relation to KiwiRail's request that a Level Crossing Safety Impact Assessment (**LCSIA**) be undertaken before construction, **Mr Fuller** considers that this is not necessary at this stage because the planned intersection upgrades will ultimately supersede any outcomes of an LCSIA, and KiwiRail will be engaged during the subsequent HSCS design phase.<sup>11</sup>

#### *Visual and Rural Character and Amenity Effects*

- 32 Comments received under s 53 in relation to visual and rural amenity have been assessed by **Ms Wilkins** in **Appendix 9**.<sup>12</sup>
- 33 In response to comments, the Applicant has updated the Barters Road landscaping strip and agreed to several additional mitigation measures, strengthening visual screening and reducing potential rural character effects.<sup>13</sup> Overall, it is considered that the resulting visual and amenity effects are minor, acknowledging that, while the change in land use will be noticeable to adjacent residents, the effects are not significant and can be

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<sup>11</sup> Appendix 4: Nick Fuller, Novo Group, Transport Memo Response Memo at [5].

<sup>12</sup> Appendix 9: Anne Wilkins, Novo Group, Landscape and Visual Response Memo.

<sup>13</sup> Appendix 1: Georgia Brown, Novo Group Limited, Pound Road Industrial Development Applicant Section 55 response – Planning at [88].

mitigated by the proposed mitigation measures and the wider industrial context.<sup>14</sup>

- 34 The core disputes, therefore, relate to additional design and amenity controls proposed by CCC, which, considering **Ms Wilkins** conclusions, are unnecessary and overly restrictive in the FTAA context.<sup>15</sup> The FTAA does not require all effects to be eliminated; it requires that they are managed to an acceptable level through conditions that are proportionate and no more onerous than necessary.

### **Regional or national benefits of the Application**

- 35 Economic benefits are relevant to the purpose of the FTAA and the decision-making criteria under it, particularly s 85, as well as in some of the decision-making criteria.
- 36 Other potential benefits of the proposal include that the proposed industrial subdivision and development will contribute to greenhouse gas emissions reductions and will fundamentally meet requirements for supporting such reductions.<sup>16</sup>

### *A cost-benefit analysis of the Application is not required*

- 37 **Mr Yeoman** has stated that the economics assessment has failed to consider (whether quantified or just recognised) all costs of the Project, including infrastructure costs, transport effects and other intangible externalities. He recommends that a cost-benefit analysis be conducted to verify that the economic benefits outweigh the costs.
- 38 While the Applicant agrees that where economic benefits are relied on by the Applicant, any economic disbenefits should be allowed for, particularly if the benefits and disbenefits are of the kind that have market values against which they can be measured in money terms, the Applicant disagrees that adverse environmental impacts should be factored directly into the assessment of economic benefits.
- 39 As stated by **Ms Hampson**, it is not the role of the economic assessment to carry out the proportionality assessment for the Application as a whole, and importantly, this has been addressed in the primary application

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<sup>14</sup> Appendix 1: Georgia Brown, Novo Group Limited, Pound Road Industrial Development Applicant Section 55 response – Planning at [88].

<sup>15</sup> Appendix 9: Anne Wilkins, Novo Group, Landscape and Visual Response Memo.

<sup>16</sup> Greenhouse Gas Emissions Overview

documents, drawing on all the technical reports and considering proposed conditions that avoid or mitigate actual and potential adverse impacts.<sup>17</sup>

- 40 This approach is consistent with s 85, which does not require quantification in monetary terms. Noting that its adverse impacts have been monitored and factored into the benefits assessment, there would not be much point in weighing the exercise of the kind required by s 85(3).
- 41 Additionally, this interpretation of s 85(3) accords with the approach taken by the Supreme Court in *Trans-Tasman Resources Ltd v Taranaki-Whanganui Conservation Board*, where it was stated that an assessment of "economic benefit" did not require the applicant to undertake a cost-benefit analysis, which ascribed monetary values to environmental, social, and cultural costs.

#### *Net-economic benefits of the Application*

- 42 The starting point is that the Application appears on Schedule 2 of the FTAA and was confirmed by the Government as meeting the Act's purpose of facilitating infrastructure and development projects that deliver significant regional or national benefits.
- 43 **Ms Hampson** has assessed the evidence of economic benefits relied on by the Applicant.
- 44 While **Mr Yeoman** considers that **Ms Hampson's** assessment may be somewhat overstated, he acknowledges that, in general terms, the construction and operation of the proposal will deliver positive economic benefits that are likely to be significant at a regional level.<sup>18</sup>
- 45 In **Appendix 6**, **Ms Hampson** rejects **Mr Yeoman's** claim of overstatement and responds as follows:<sup>19</sup>
- (a) **Geographic Focus of Demand:** The response clarifies that demand for industrial land is not uniform across Christchurch. The Islington–Hornby South area is a focal point for demand, and not all industrial locations are substitutable due to differences in zoning, accessibility, lot size, tenure, and price.
  - (b) **Vacant Land Take-Up:** Recent take-up of vacant industrial land in Islington–Hornby South has been rapid, with 35.4 hectares

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<sup>17</sup> Appendix 6: Natalie Hampson, Savvy Consulting, Economics Response Memo at 8.

<sup>18</sup> Formative report at [15].

<sup>19</sup> Appendix 6: Natalie Hampson, Savvy Consulting, Economics Response Memo.

developed between October 2024 and March 2025—the fastest period since 2016. The average annual take-up from January 2016 to March 2025 is now 15.4 hectares per annum.

- (c) **Capacity Adjustments:** After correcting for minor errors and updating assumptions (e.g., non-developable land ratio), **Ms Hampson** confirms that current vacant capacity in Islington–Hornby South is estimated at 126.7–158.5 hectares, which is 15% lower than previously reported.

- (d) **Demand Scenarios:** Updated demand scenarios (excluding the competitiveness margin) are calculated by **Ms Hampson** as being:

*Low: 8.8 ha/year*

*Medium: 14.7 ha/year*

*High: 15.4 ha/year*

*The very high recent rate (35.4 ha/year) is excluded for conservatism.*

- (e) **Sufficiency:** Only under the low demand scenario (8.8ha/year) would there be sufficient capacity for the next 10 years. Under medium and high scenarios, shortfalls are expected in the medium term.

- (f) **Construction Impact Modelling:** The economic impact modelling has been updated to reflect the latest scheme plan (September 2025), reducing the estimated cumulative economic impacts by 17% due to a lower total gross floor area.

- 46 The core tangible economic benefits of the industrial development identified by **Ms Hampson**, after considering comments from **Mr Yeoman**, include that:<sup>20</sup>

- (a) The Application will help ensure that Greater Christchurch has sufficient capacity to meet expected industrial land demand in the short, medium, and long term.
- (b) Contribute significant total value added and sustaining direct, indirect and induced employment during the land development and building construction stages (now estimated at \$<sub>2020</sub>470 million (\$<sub>2020</sub>232 million present value at an 8% discount rate) and 3,555 FTE years).
- (c) Provide capacity to support a large number of industrial businesses, which collectively will contribute significant net total value added to

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<sup>20</sup> Appendix 6: Natalie Hampson, Savvy Consulting, Economics Response Memo at 10.

the Canterbury economy annually and sustain significant net long-term direct, indirect, and induced jobs.

- (d) Expand an existing industrial locality and therefore support greater agglomerations' benefits in the locality; and
- (e) Support a competitive industrial land market by introducing more land that can be purchased (freehold) in a location of high relative demand that is highly suited for industrial development and supports a well-functioning urban environment.

47 In relation to potential economic costs of the Application, **Ms Hampson** has concluded that when the ongoing value-added contribution of an indicative 73 industrial businesses is added to the quantified construction impacts, the long-term economic contribution of the proposed industrial development will outweigh the long-term direct and indirect economic contributions from utilisation of any productive capacity associated with the land, which would be forgone.<sup>21</sup>

48 In conclusion, the evidence shows that the Application will deliver substantial net economic benefits consistent with the purpose of the FTAA and s 85. **Mr Yeoman** accepts that the development will generate significant regional benefits, and **Ms Hampson's** updated analysis confirms that these benefits are robust and conservatively assessed.

49 Overall, the Application aligns with the FTAA by enabling development that delivers significant material economic gains for the region.

### **Approvals otherwise be applied for under the Resource Management Act 1991 (RMA)**

50 Approvals are sought under s42(4)(a) of the Act (resource consents that would have otherwise been applied for under the RMA) for the Application.

51 In considering whether to grant resource consents under the FTAA, the Panel must apply clauses 17–11 of Schedule 5 of the FTAA. Clause 17 is important as it sets out the criteria and other matters to be assessed.

52 Clause 17 is relevant in these terms:

#### **17 Criteria and other matters for assessment of consent application**

- (1) For the purposes of section 81, when considering a consent application, including conditions in

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<sup>21</sup> Appendix 6: Natalie Hampson, Savvy Consulting, Economics Response Memo

accordance with clauses 18 and 19, the Panel must take into account, giving the greatest weight to paragraph (a),—

(a) the purpose of this Act; and

(b) the provisions of Parts 2, 3, 6, and 8 to 10 of the Resource Management Act 1991 that direct decision making on an application for a resource consent (but excluding section 104D of that Act); and

(c) the relevant provisions of any other legislation that directs decision making under the Resource Management Act 1991.

(2) For the purpose of applying any provisions in subclause (1),—

(a) a reference in the Resource Management Act 1991 to Part 2 of that Act must be read as a reference to sections 5, 6, and 7 of that Act;

...

(3) Subclause (4) applies to any provision of the Resource Management Act 1991 (including, for example, section 87A(6)) or any other Act referred to in subclause (1)(c) that would require a decision maker to decline an application for a resource consent.

(4) For the purposes of subclause (1), the Panel must take into account that the provision referred to in subclause (3) would normally require an application to be declined, but must not treat the provision as requiring the Panel to decline the application the Panel is considering.

....

53 Subclause (3) and (4) should be read in conjunction with s 85(4). They mean that directive avoidance policies in planning instruments are to be taken into account in the manner outlined in clause 17(4) (i.e. an avoidance policy does not require the Panel to decline an application).

54 Additionally, the decision-making criteria in the FTAA Schedules impose obligations on decision makers that are never more stringent than being required to “take into account” the matters specified. The FTAA criteria are distinctly different from those that would otherwise apply under the RMA and, importantly, avoid the prolonged evaluative process that would ordinarily attach to the application of s 104D(1)(b).

- 55 The Application must therefore be assessed through the lens of the FTAA's tailored framework, rather than through the more restrictive gateway tests or "avoidance" directives contained in standard RMA planning instruments. This provides a materially different—and more focused—decision-making pathway.
- 56 Therefore while the Application involves the 'urbanisation' of land that is not identified as urban or a greenfield priority area in the Canterbury Regional Policy Statement and is currently zoned rural under the Christchurch District Plan, the rural-land 'avoidance' policies in the NPS-HPL (if it applies),<sup>22</sup> the CRPS and the District Plan must be read in the context of the FTAA, which expressly provides for urbanisation of rural land via resource consent without prior rezoning.
- 57 An assessment of the relevant provisions under clause 17 has already been undertaken as part of the substantive application. **Ms Brown** states in **Appendix 1** that her position remains unchanged and that, insofar as the current zoning set aside, the Application is generally consistent with the relevant RMA planning instruments:<sup>23</sup>
- (a) CRC agrees that the main issues are the site's location outside a Greenfield Priority Area and the loss of versatile soils. While this departs slightly from the CRPS direction, CRC considers the proposed infrastructure conditions adequate to ensure safe operation of the Application. It also notes that although the development is "out of sequence," its location beside an industrial zone means it is not necessarily inappropriate. Overall, assessing the proposal under Parts 2, 3 and 6 of the RMA, CRC considers it consistent with the Act's purpose and principles.
  - (b) CCC notes uncertainty about how the NPS-UD applies to a resource consent but accepts that the proposal would form part of the urban environment and interface with the existing city. Its assessment of servicing, hazards, transport, subdivision and design indicates the development is suitably designed. The Council therefore considers the proposal generally consistent with the NPS-UD and sees no need for further assessment.
- 58 In light of the above assessment of the potential adverse impacts of the Application and the preceding assessment of the relevant statutory

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<sup>22</sup>Appendix 11: Anderson Lloyd Memorandum on the applicability of the National Policy Statement on Highly Productive Soils.

<sup>23</sup> Appendix 1: Georgia Brown, Novo Group Limited, Pound Road Industrial Development Applicant Section 55 response – Planning at [112] – [120].

decision-making that guides the Panel's decisions, the Applicant submits that, subject to the conditions of consent proposed by the Applicant, the resource consents sought from the CCC and CRC can be granted.

### **Approvals otherwise applied for under the Wildlife Act 1953 (WA)**

- 59 Applications for approvals that would otherwise be made under s 53 of the WA can be made under the FTAA, see s 42(4)(h).
- 60 Schedule 7, clause 5 sets out the criteria for assessment of an application for a wildlife approval under the WA:

#### **5 Criteria for assessment of application for wildlife approval**

For the purposes of section 81, when considering an application for a wildlife approval, including conditions under clause 6, the Panel must take into account, giving the greatest weight to paragraph (a),—

(a) the purpose of this Act; and

(b) the purpose of the Wildlife Act 1953 and the effects of the Project on the protected wildlife that is to be covered by the approval; and

(c) information and requirements relating to the protected wildlife that is to be covered by the approval (including, as the case may be, in the New Zealand Threat Classification System or any relevant international conservation agreement).

- 61 The purpose of the WA includes protecting species and particular wildlife populations that are at risk. The NZ Threat Classification System (**NZTCZ**) is a national system that assesses the conservation status of species found in the wild in New Zealand.
- 62 The Applicant seeks approval for the capture, handling, release, marking and incidental killing of southern grass skink<sup>24</sup> and McCann's skink.<sup>25</sup>
- 63 The Applicant, CCC, CRC and the Department of Conservation (**DOC**) are in general agreement and supportive of the actions outlined in the conditions and the Lizard Management Plan (**LMP**).

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<sup>24</sup>*Oligosoma* aff. *Polychrome* Clade 5. NZ Threat Classification System (At risk – declining).

<sup>25</sup>*Oligosoma maccanni*. NZ Threat Classification System (Not Threatened).



- 64 The Applicant has made further amendments to the conditions and the LMP in response to comments from CCC and DOC, and any outstanding concerns have been addressed by **Ms King**.<sup>26</sup>
- 65 **Ms King** has concluded that all concerns have been appropriately addressed in the updated LMP (dated 10 November 2025), and that, subject to the agreed conditions, there will be no adverse effects that reach the threshold of a "sufficiently significant adverse impact" such that they need to be taken into account under a s 85 assessment.
- 66 On this basis, the Applicant submits that the expert Panel must grant the WA authority approvals under the FTAA.

### **Conditions on Approvals sought by the Applicant**

- 67 As stated above, s 81 of the FTAA provides that the Panel must set out any conditions to be imposed on the approvals. In setting conditions, the Panel must comply with s 83 and may impose conditions under s 84A.
- 68 The Applicant's updated proposed conditions in response to comments by CCC, CRC and DOC are attached to the Applicant's response as tables in **Appendix 2** (CCC land use and subdivision conditions and DOC wildlife approval conditions) and **Appendix 3** (CRC land use, water permit and discharge conditions). With regard to **Appendix 2**, noting that CCC did not provide a full set of conditions, the conditions in Column One are those offered by the Applicant and/or updated in response to the s 53 comments.
- 69 For ease of reference and to highlight points of agreement or disagreement between the parties, the tables provided within these documents include a traffic light colour system where:

**Green** = No (or very minimal) changes are proposed to the Council's s53 conditions, and the conditions are agreed between NTP and the Councils.

**Orange** = Means changes are proposed to the Council's s 53 conditions by NTP to address comments made by the s 53 parties or to improve wording. *Note: any changes to the CRC conditions have subsequently been agreed with them, further detail provided below.*

**Red** = The Council's s 53 recommended condition is not agreed to by NTP and is proposed to be deleted, or alternative wording to the Council's s53 condition is proposed that is seeking a different outcome.

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<sup>26</sup> Wildlands (November 2025); Wildlands (December 2025).

*Conditions for approvals otherwise applied for under the RMA*

- 70 Schedule 5, clause 18 sets out the criteria for conditions on resource consent for approvals under the RMA:

**18 Conditions on resource consent**

When setting conditions on a consent, the provisions of Parts 6, 9, and 10 of the Resource Management Act 1991 that are relevant to setting conditions on a resource consent apply to the Panel, subject to all necessary modifications, including the following:

(a) a reference to a consent authority must be read as a reference to a panel; and

(b) a reference to services or works must be read as a reference to any activities that are the subject of the consent application.

*Conditions on Traffic and Extent of Transportation Upgrades*

- 71 As stated above, the point of difference between the Applicant, CCC and NZTA does not concern the scale or nature of transport effects. It is about when and how the relevant upgrades are funded and delivered. In relation to the Application, this primarily relates to the proposed conditions governing the upgrades to the State Highway 1/Pound Road intersection and the Pound Road/Waterloo Road intersection upgrades, including associated rail crossing works.
- 72 The Applicant's proposed conditions provide a clear, proportionate and practical framework for managing these upgrades. Achieving outcomes intended by the FTAA rather than what is effectively a third-party condition on the development occurring, as suggested by CCC's condition.
- 73 Under the Applicant's approach, Stage 1 titles are not issued before 31 December 2027, and Stage 2 and beyond cannot be titled until the earlier of 1 January 2029 or the Applicant entering into a Developer Agreement with CCC and/or NZTA to facilitate the SH1/Pound Road and Pound Road/Waterloo Road upgrades (including the rail crossing). Under the Applicant's condition, the Applicant also provides a defined, proportionate contribution toward these upgrades based on traffic generation and the cost of ITA designs. This framework gives certainty that infrastructure can be delivered, ensures the development addresses its direct effects, and preserves flexibility for CCC and NZTA to finalise the upgrade designs following completion of the HSCS.

- 74 By contrast, CCC proposes prohibiting all development beyond Stage 1 until updated modelling satisfies CCC and NZTA that the intersections can safely accommodate additional traffic. That approach is significantly more onerous and misaligned with the FTAA. It makes development contingent on third-party action or, in a worst-case scenario, implements development decision-making processes and timing entirely outside the Applicant's control and imposes an undefined "satisfaction" standard with no clear thresholds or timeframes. This creates the high risk of open-ended deferral that the FTAA seeks to avoid. It also fails an assessment under s 83 "no more onerous than necessary"; noting that where a materially similar outcome can be secured by a less restrictive condition, the more restrictive option cannot be imposed.
- 75 Parliament recently introduced s 84A specifically to avoid outcomes like the Delmore project, where a fast-track development was effectively stopped due to third-party (in)actions because infrastructure upgrades were not yet sequenced or fully designed.<sup>27</sup> Fast-track projects are, by definition, often out of sequence with long-term capital programmes. Section 84A provides a mechanism to approve such projects, subject to conditions that ensure that infrastructure can be made adequate, even when final upgrade designs or timing remain under development by transport agencies. The Applicant's proposed conditions reflect this legislative intention precisely.
- 76 As stated by **Mr Fuller**, the evidence demonstrates that the required upgrades are physically achievable and that they are not needed until around 2030–2031. The only outstanding uncertainty concerns the final design, which will be resolved through the HSCS. The Applicant's conditions provide certainty of outcome and appropriate contributions, while allowing NZTA and CCC to determine the final design and timing through their usual network planning processes.
- 77 For these reasons, the Applicant's conditions are the appropriate, proportionate and legally sound option. They secure infrastructure adequacy as required by s 84A, avoid improper dependency on third-party processes, and properly implement the purpose of the FTAA. CCC's condition is unnecessarily restrictive and risks reinstating the very problem Parliament very recently enacted s 84A to solve.

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<sup>27</sup> [https://www3.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb\\_20251209\\_20251210\\_30](https://www3.parliament.nz/en/pb/hansard-debates/rhr/combined/HansDeb_20251209_20251210_30).

*Conditions for approvals otherwise applied for under the WA*

- 78 Schedule 7, clause 6 sets out the criteria for conditions for a Wildlife approval under the WA:

**6 Conditions**

(1) A panel may set any conditions on a wildlife approval that the Panel considers necessary to manage the effects of the activity on protected wildlife.

(2) In setting any condition under subclause (1), the Panel must—

(a) consider whether the condition would avoid, minimise, or remedy any impacts on protected wildlife that is to be covered by the approval; and

(b) where more than minor residual impacts on protected wildlife cannot be avoided, minimised, or remedied, ensure that they are offset or compensated for where possible and appropriate; and

(c) take into account, as the case may be, the New Zealand Threat Classification System or any relevant international conservation agreement that may apply in respect of the protected wildlife that is to be covered by the approval.

- 79 There is general agreement between the Applicant, DOC, CRC and CCC in relation to conditions associated with herpetology, terrestrial and avifauna. In consideration of Schedule 7, clause 6, it is considered that the Applicants' proposed conditions meet the requirements set out in cl 6(2)(a), (b) and (c).

**Conclusions and Overall Approach**

- 80 The potential adverse impacts of the Application are typical of those associated with large-scale industrial development (as discussed above). While the effects were subject to numerous comments, a substantial number of the issues have been resolved between the relevant administering agencies and commenters under s 53 of the FTAA.
- 81 The Applicant considers that the principal issues in contention have been adequately addressed and appropriate responses in the FTAA context have been codified in the conditions proposed by the Applicant.

82 In summary:

- (a) The Application will generate significant regional benefits;
- (b) The adverse impacts from the Application do not reach the threshold of "sufficiently significant" such that they would be out of proportion to the Application's regional benefits in terms of an assessment under s 85 of the FTAA; and
- (c) Appropriate conditions must be imposed on the Application in a manner consistent with the purpose of the FTAA, and in accordance with the requirements in s 81, 83 and 84A.

83 Having regard to all relevant matters, the Application meets the purpose of the FTAA and, having regard to all relevant decision-making criteria, the approvals sought should be granted with the proposed conditions attached in **Appendix 2** and **Appendix 3**.

Dated this 19 December 2025

A handwritten signature in black ink, appearing to read 'Jo Appleyard', written over a horizontal line.

Jo Appleyard / Tallulah Parker  
Counsel for NTP Development Holdings Limited

**Attachment A: Complete list of the reports prepared by the Applicant's  
expert consultants**

**Attachment 1 - A full list of the reports prepared by the Applicant's expert consultants is appended to this memorandum**

**Appendix 1:** Georgia Brown, Novo Group Limited, Pound Road Industrial Development Applicant Section 55 response – Planning;

**Appendix 2:** CCC Land Use and Subdivision Conditions, and DOC Wildlife Conditions;

**Appendix 3:** CRC Land Use, Water Permit and Discharge Conditions, and email correspondence confirming agreement of the conditions;

**Appendix 4:** Nick Fuller, Novo Group, Transport Memo Response Memo;

**Appendix 5:** Todd Inness, Davie Lovell Smith, Civil Engineering Response Memo;

**Appendix 6:** Natalie Hampson, Savvy Consulting, Economics Response Memo;

**Appendix 7:** Laura Drummond, Stantec, Aquatic Ecology Response Memo;

**Appendix 8:** Samantha King, Wildlands, Lizard Management Plan and Terrestrial Response;

**Appendix 9:** Anne Wilkins, Novo Group, Landscape and Visual Response Memo;

**Appendix 10:** Email correspondence with the Department of Corrections; and

**Appendix 11:** Anderson Lloyd Memorandum on the applicability of the National Policy Statement on Highly Productive Soils.

**Attachment B: Changes to provisions governing the Panel's consideration  
of the Application under the FTAA**



## Attachment 2 - Changes implemented under the Fast-track Approvals Amendment Act 2025, which affect the Panel's consideration of the Application

### Part 2

#### Provisions relating to Fast-track Approvals Amendment Act 2025

##### 5 Interpretation

In this Part,—

**amendment Act** means the Fast-track Approvals Amendment Act 2025

**application** means any of the following:

- (a) a land exchange application;
- (b) a referral application;
- (c) a substantive application

**first commencement date** means the date on which the amendment Act comes into force under section 2(1) of that Act (the day after the amendment Act receives Royal assent)

**new clause** means the specified clause as amended, replaced, or inserted by the amendment Act

**new section** means the specified section as amended, replaced, or inserted by the amendment Act

**old section** means the specified section as in force immediately before being amended, replaced, or inserted by the amendment Act

**second commencement date** means the date on which the amendment Act comes into force under section 2(2) of that Act (31 March 2026).

#### *Transitional provisions relating to applications*

##### 6 Application of amendments to applications lodged before first commencement date

- (1) This Act, as in force immediately before the first commencement date, continues to apply in respect of an application lodged before the first commencement date.
- (2) However,—
  - (a) if the application is a referral application and it is not decided under section 21 before the first commencement date, new section 22 applies in respect of that application on and after the first commencement date;
  - (b) if the application is a substantive application and the approvals sought in the application have not been decided under section 81 before the first commencement date, the following provisions apply in respect of that application on and after the first commencement date:
    - (i) new section 60;
    - (ii) new sections 62 to 66;
    - (iii) new section 81;
    - (iv) new section 84A;
    - (v) new clause 20 of Schedule 11;
  - (c) if the application is a substantive application and the approvals sought in the application have not been decided under section 81 before the second commencement date, the following provisions apply in respect of that application on and after the second commencement date:
    - (i) new sections 68A and 68B;
    - (ii) new section 88.

**31 Section 60 amended (When processing of substantive application may be suspended)**

- (1) In [section 60\(1\)\(b\)](#), replace “Minister” with “panel convener”.
- (2) In [section 60\(1\)\(c\)](#), replace “the panel” with “the panel convener or the panel”.

**32 Section 62 amended (Minister may direct suspension in processing substantive application)**

- (1) In the heading to [section 62](#), replace “Minister” with “Panel convener”.
- (2) In [section 62\(1\), \(2\), \(3\), and \(4\)](#), replace “Minister” with “panel convener” in each place.

**33 Section 63 amended (Resumption in processing substantive application following suspension under section 62)**

- (1) In [section 63\(1\)](#), replace “Minister” with “panel convener”.
- (2) In [section 63\(2\), \(3\), and \(4\)](#), replace “Minister’s” with “panel convener’s”.

**34 Section 64 amended (Applicant may request suspension of processing of substantive application)**

- (1) In [section 64\(2\)\(a\)](#), delete “under section 46”.
- (2) Replace [section 64\(3\)](#) with:
  - (3) When a request is made under subsection (1), the panel convener or, if a panel has been set up, the panel, may suspend the processing of a substantive application at their or its discretion.
- (3) In [section 64\(4\)](#),—
  - (a) replace “a panel” with “the panel convener or a panel”;
  - (b) replace “the panel” with “the panel convener or the panel”.

**35 Section 65 amended (Resumption in processing of substantive application following suspension under section 64)**

- (1) In [section 65](#), replace “the panel” with “the panel convener or the panel” in each place.
- (2) In [section 65\(4\)](#), replace “a panel” with “the panel convener or a panel”.

**36 Section 66 amended (Return of substantive application)**

- (1) In [section 66](#), replace “a panel” with “the panel convener or a panel” in each place.
- (2) In [section 66\(6\)](#), replace “50” with “100”.

**40 Section 81 amended (Decisions on approvals sought in substantive application)**

- (1) Before [section 81\(2\)\(a\)](#), insert:
  - (aaa) must, if the substantive application relates to an unlisted project, consider the Minister’s reasons for accepting the referral application that are stated in the notice given by the responsible agency under [section 28\(1\)](#);
  - (aab) must consider a relevant Government policy statement;
- (2) After [section 81\(2\)\(e\)](#), insert:
  - (ea) may impose conditions under [section 84A](#);
- (3) In [section 81\(5\)](#), replace “[section 42\(1\)\(b\)](#)” with “[section 42\(1\)\(aa\)](#) or (b)”.

**41 New section 84A inserted (Conditions relating to infrastructure)**

After [section 84](#), insert:

**84A Conditions relating to infrastructure**

- (1) The panel may set conditions to ensure that the infrastructure in the project area or other infrastructure the project will rely on is or can be made adequate to support—
  - (a) the project; or
  - (b) the stage of the project to which the application relates.
- (2) This section applies in addition to, and does not limit, any other powers to set conditions under this Act.
- (3) To avoid doubt, a condition set under this section may impose an obligation on the applicant only.

## **58 Schedule 11 amended**

- (1) In Schedule 11, replace [clause 20\(1\)\(a\)](#) with:
  - (a) that the deposit for which the mining permit is sought is in the land to which any of the exploration permits or existing privileges referred to in section 42(11) apply; and
- (2) In Schedule 11, [clause 20\(1\)\(f\)](#), replace “operator has or is likely to have, by the time relevant work undertaken under a permit is completed” with “operator has or is highly likely to have, by the time relevant work under a permit is undertaken”.

## **Attachment C: Potential adverse impacts from the Application**

### ATTACHMENT 3: Summary of adverse impacts from the Application

Table 1. Potential adverse impacts (before conditions or modifications)	
1.	<b>Economic adverse Impacts:</b> Loss of agricultural productive capacity.
2.	<b>Visual and Rural Character Amenity Effects:</b> Effects on the landscape character and rural values of the area due to the change in land use.
3	<b>Reverse Sensitivity effects:</b> Reverse sensitivity refers to the potential for a new activity (in this case, the proposed industrial uses) to be sensitive to effects generated by an existing lawful activity and to generate complaints.
4.	<b>Noise:</b> The acoustic effects of the proposal and change in land use.
5.	<b>Transport Effects:</b> Transport safety and efficiency effects of the proposal, including the funding and delivery of associated upgrades.
6.	<b>Three Waters Infrastructure:</b> Adverse impacts arising from uncertainty regarding servicing, including an upgrade pathway for water and wastewater infrastructure.
7.	<b>Earthworks, Stormwater Discharge and Contamination Effects:</b> Potential adverse impacts relating to contaminated land due to previous HAIL activities occurring at the site and the presence of contaminants above background concentrations.
8.	<b>Freshwater Ecology Effects:</b> Potential groundwater and surface water ecology effects on the Paparua Water Race along Barters Road.
9.	<b>Herpetology, Terrestrial and Avifauna:</b> Effects on herpetology, terrestrial and avifauna, including the potential disruption of lizard habitat.
10.	<b>Inconsistency with outcomes with relevant provisions and planning instruments:</b> urbanises land not identified as urban or a greenfield priority area and currently zoned rural, the NPS-HPL (if applicable), CRPS and District Plan.

**Table 2. Summary of proposed conditions or modifications to address potential adverse effects**

Impact		Conditions or modifications that the Applicant proposes to avoid, remedy, mitigate, offset, or compensate for those adverse impacts	*Potential Impact			Reference to s 55 response	Agreed between the Applicant and the relevant s 53 parties?
			+	O	-		
<b>Economic Adverse Impacts</b>	1.	<p>Loss of potential productive capacity.</p> <p>However, the long-term economic benefits generated by the proposed industrial development will exceed the direct and indirect economic contributions that would otherwise arise from the land's productive capacity.</p>			-	<b>Appendix 6:</b> Natalie Hampson, Savvy Consulting, Economics Response Memo;	CCC and NTP agree that the site is subject to permanent or long-term constraints, and subdivision, use or development is permitted under Clause 3.10 of the NPS-HPL.
<b>Visual and Rural Character Amenity Effects</b>	2.	<p>The landscape and visual effects of the proposed industrial subdivision are assessed to be low. While the change in land use will result in effects on directly adjacent residents that are more than minor, these effects are not considered significant or unacceptable</p> <p>Several conditions have been proposed to mitigate landscape and visual effects.</p>			-	<b>Appendix 9:</b> Anne Wilkins, Novo Group, Landscape and Visual Response Memo;	While several CCC-proposed conditions have been accepted, full agreement has not been reached
<b>Reverse Sensitivity effects</b>	3.	Conditions expressly exclude residential activities, residential units, visitor accommodation, and education facilities from the consent.		O		<b>Appendix 10:</b> Email correspondence with the Department of Corrections.	Agreement between NTP and the Department of Corrections.

		Additionally, corrections have accepted the proposed condition requiring a no-complaints covenant to manage potential reverse sensitivity effects.					
Noise	4.	The acoustic effects of the proposal are considered minor and acceptable. CCC agrees that Noise generated from the proposed industrial subdivision can comply with the CDP noise levels at neighbouring properties		O		Appendix 1: Memorandum of Georgia Brown (Novo Group)	Agreement between the NTP and CCC.
Transport Effects	5.	NTP's modelling and proposed intersection solution have been accepted. The outstanding issue concerns the funding and timing of the intersection upgrades.  NTP's volunteered condition provides a workable approach to funding and timing the upgrades, ensuring the project's transport effects remain acceptable while enabling the project to proceed and deliver significant regional benefits.			-	Appendix 4: Nick Fuller, Novo Group, Transport Memo Response Memo	Areas of disagreement between CCC and the Applicant regarding appropriate conditions.
Three waters Infrastructure	6.	Modifications and amendments to the site's wastewater and water servicing proposals and associated conditions mitigate potential adverse effects from the Application.  NTP and CCC are effectively aligned on three-waters servicing, with agreed stormwater conditions and a clear upgrade pathway for water and wastewater infrastructure.		O		Appendix 5: Todd Inness, Davie Lovell Smith, Civil Engineering Response Memo	There is near full alignment between NTP and CCC on the three-waters infrastructure, subject to minor amendments to the conditions.
Earthworks, Stormwater Discharge and Contamination Effects	7.	Earthworks, stormwater discharge from construction, and contamination effects can be <b>appropriately managed</b> by standard practices.		O		Appendix 1: Memorandum of Georgia Brown (Novo Group)	Full agreement between the NTP, CRC and CCC.
Freshwater Ecology (Ground	8.	Modifications and amendments to conditions mitigate the potential adverse effects of the development on the Paparua Water Race. Effects will be mitigated through		O		Appendix 7: Laura Drummond, Stantec,	NTP and CRC are in agreement on the proposed and

<b>and Surface Water)</b>		permitted-design culverts, a 5 m planted buffer, erosion and sediment controls, bankside vegetation retention, and fish-salvage measures.  Any effects on groundwater quality associated with the discharge are considered to be less than minor, subject to appropriate robust erosion and sediment control as proposed in the volunteered consent conditions.				Aquatic Ecology Response Memo;  <b>Appendix 9:</b> Anne Wilkins, Novo Group, Landscape and Visual Response Memo;	associated conditions.
<b>Herpetology, Terrestrial and Avifauna:</b>	<b>9.</b>	Effects associated with herpetology, terrestrial ecology and avifauna, including management of lizards, are acceptable.		<b>O</b>		<b>Appendix 8:</b> Samantha King, Wildlands, Lizard Management Plan and Terrestrial Response;	General agreement between the NTP, DOC, CRC and CCC
<b>Inconsistency with outcomes with relevant provisions and planning instruments:</b>	<b>10.</b>	The Application urbanises land not identified as urban or a greenfield priority area and currently zoned rural, the NPS-HPL (if applicable), CRPS and District Plan.  However, the 'avoidance' policies must be read in light of the FTAA, which expressly permits the urbanisation of rural land through resource consent. The proposal is generally consistent with the relevant RMA planning instruments.		<b>O</b>		<b>Appendix 1:</b> Memorandum of Georgia Brown (Novo Group)  <b>Appendix 11:</b> Anderson Lloyd Memorandum on the applicability of the National Policy Statement on Highly Productive Soils	General agreement in conclusions between NTP, CRC and CCC

<b>*Key for Table 2</b>		
<i>Potential impact (after considering avoidance, remediation, mitigation, offsetting or compensation measures)</i>	+	Positive Impact
	O	Neutral/no more than minor impact
	-	Negative Impact



Table 3. Summary for section 85(3) evaluation	
Comparison of adverse impacts after taking into account conditions or modifications that the applicant proposes avoid, remedy, mitigate, offset, or compensate for those adverse impacts against the projects regional or national benefits	
Remaining adverse impacts (after taking into account conditions or modifications that the applicant proposes avoid, remedy, mitigate, offset, or compensate for those adverse impacts)	Regional benefits of the Pound Road Industrial Development (as set out in the reply of in <b>Appendix 6</b> ))
<ol style="list-style-type: none"> <li><b>1. Loss of Agricultural Production</b></li> <li><b>2. Loss of rural amenity:</b> Reduction in rural character and amenity for adjoining neighbours.</li> <li><b>3. Traffic Effects:</b> Primarily related to timing/funding of infrastructure upgrades.</li> </ol>	<ol style="list-style-type: none"> <li>1. Help ensure that Greater Christchurch has sufficient capacity to meet expected industrial land demand in the short, medium, and long term.</li> <li>2. Contribute significant total value added and sustaining direct, indirect and induced employment during the land development and building construction stages (now estimated at \$470 million (\$232 million present value at an 8% discount rate) and 3,555 FTE years).</li> <li>3. Provide capacity to support a large number of industrial businesses, which collectively will contribute significant net total value added to the Canterbury economy annually and sustain significant net long-term direct, indirect, and induced jobs.</li> <li>4. Expand an existing industrial locality and therefore support greater agglomerations' benefits in the locality; and</li> <li>5. Support a competitive industrial land market by introducing more land that can be purchased (freehold) in a location of high relative demand that is highly suited for industrial development and supports a well-functioning urban environment.</li> </ol>