YOUR COMMENT ON THE SOUTHWEST INDUSTRIAL PROJECT

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Canterbury Regional Council (Environment Canterbury)		
First name	Victoria		
Last name	Kingsbury		
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Home phone / Mobile phone	-	**Work phone**	s9(2)(a)
Email ***(a valid email address enables us to communicate efficiently with you)***	fasttrack@ecan.govt.nz		

2.			
☐	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

Thank you for your comments

9 October 2026

Environment Canterbury Regional Council
Kaunihera Taiao ki Waitaha

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Max Gander-Cooper
Acting Manager – Fast-track Operations
Fast-track Applications
Environmental Protection Authority
info@fasttrack.govt.nz

Kia ora Max,

Thank you for your letter received 22 September 2026 regarding the Southwest Industrial project from Puna Property Holdings Limited and Foddercube Products (Nth Canty) Limited.

Please find attached the response from Canterbury Regional Council (CRC) to the specific questions raised in the above letter. Also included within the response are general comments on the proposal which may assist the Minister in making their determination under section 21 of the Fast Track Approvals Act 2024 (FTAA).

Overall, CRC are neutral towards the referral of this proposal because it does not meet the following criteria in section 22 (1) (a) and there are no reasons to decline the proposal under section 21.

CRC trusts that these comments will assist the Minister in determining whether to accept the referral application and proceed with referring the project. Should any further information be required, please do not hesitate to contact us.

Ngā mihi



Victoria Kingsbury

Principal Consents Planner

CANTERBURY REGIONAL COUNCIL COMMENTS UNDER S17 FTAA – SOUTHWEST INDUSTRIAL

Specific questions from the EPA

Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please also confirm this in writing.

CRC does not hold a record of any competing applications (per the definition in the Fast-track Approval Act 2024 (**FTAA**)) in the same project area.

In relation to projects seeking approval of a resource consent under section 42(4)(a) of the FTAA, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please also confirm this in writing.

In accordance with section 30(3)(b) of FTAA, CRC can confirm that there are no existing resource consents of that kind.

Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act).

In accordance with section 5 of the FTAA, CRC does not consider that the project may involve any ineligible activities.

Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of Act).

CRC has assessed the application against the circumstances in which the Minister must or may decline a referral application under section 21(3) to (5) of the Act, and the criteria for accepting a referral under section 22, as set out in the tables below. In summary, CRC does not identify any matters that would require, or support declining the referral under section 21(3) to (5).

Whether the project would have significant regional or national benefits (refer to section 22 of the FTAA for the criteria for assessing referral applications). Additionally, and in this context, provide any high-level commentary regarding the project's alignment with the Council's relevant plans, policies, and/or strategies (including any proposed plans).

CRC does not consider that the application demonstrates that the section 22 criteria are met. In particular, CRC considers that the evidence does not demonstrate that the proposal would provide significant regional or national benefits.

Canterbury Regional Policy Statement

The Canterbury Regional Policy Statement (CRPS) gives an overview of the significant resource management issues facing the region, including issues of resource management significance to Ngāi Tahu. The purpose of the CRPS is to set out objectives, policies and methods to resolve those resource management issues and to achieve the integrated management of the natural and physical resources of Canterbury.

The CRPS seeks to ensure development, including the associated use and provision of infrastructure and services, appropriately manages adverse effects on the environment in order to enable people and communities to provide for their social, economic and cultural well-being.

Development can either enable or adversely affect the ability of people and communities to provide for their social, economic and cultural well-being, and health and safety. Once development is established it is likely to exist for a number of generations. Changing the form and structure of established urban, rural-residential and rural areas can be difficult and expensive. Therefore, the CRPS seeks to achieve a robust form of development that is responsive in the long term to changing needs of people and communities

Land-use and infrastructure require coordination and integration in order to ensure potentially significant benefits to people and the community are achieved and that the adverse effects on the environment are appropriately avoided, remedied, or mitigated and/or controlled.

Overall, the proposal appears to be broadly consistent with the CRPS, subject to adverse effects on the environment being appropriately avoided, remedied, or mitigated and/or controlled. However, CRC anticipates that the applicant would provide a comprehensive assessment of adverse effects as well as suitable Management Plans addressing adverse effects within a substantive application (if referred).

If the substantive application can appropriately address adverse effects, the proposal would likely be consistent with the CRPS. However, a detailed assessment against the relevant objectives and policies of the CRPS should be provided as part of the substantive application. Until that assessment is provided, CRC cannot confirm whether the proposal is fully consistent with the CRPS, particularly in relation to urban development, infrastructure sequencing, natural hazards, and loss of productive land.

CRC notes that the CRPS generally reflects the RMA terminology of avoiding, remedying or mitigating adverse effects. The FTAA also provides for offsetting and compensation as potential measures to address adverse effects where appropriate.

Canterbury Land and Water Regional Plan

The CLWRP sets out objectives and policies that identify the importance of high-quality freshwater for social, cultural and economic wellbeing, and that recognise the connectivity between land-use and the various sources of freshwater. The CLWRP also recognises that land-use and development will occur but can have adverse effects on the quality of freshwater, if not appropriately managed. Consequently, the CLWRP seeks that land-use and development occur in a manner that avoids, remedies or mitigates adverse effects on the biophysical and cultural values, including Ngāi Tahu values, of freshwater in Canterbury.

CRC anticipate that the applicant would provide within the application a fulsome assessment of adverse effects as well as comprehensive Management Plans addressing adverse effects of groundwater take, earthworks, disturbance of contaminated land, and potential discharges during construction and operational phases, in accordance with best practice.

The Applicant has stated that construction and operational stormwater will be discharged under the Christchurch City Council's global consent and that wastewater from the proposed development would be connected to reticulated Council infrastructure. CRC understands that there is no capacity in the reticulated network at the site to service the construction and operational needs of the proposal. CRC anticipate that the applicant may require regional consents and that suitable civil engineering details would be included within the application. If a substantive application contains the appropriate assessment, including the relevant specialist assessments and Management Plans, the proposal would likely be consistent with the CLWRP.

The applicant has identified consents that may be required but has not identified what consents they actually require or would seek consent for, if referred. There is insufficient information in the

application for CRC to determine the relevant rule considerations at this stage. CRC notes that a detailed application and rule assessment will need to be provided before CRC can provide an equally detailed assessment.

GENERAL COMMENTS FROM CRC TO ASSIST WITH CONSIDERATION AGAINST S21 AND S22 FTAA

Criteria under Section 21	CRC Comment
3) The Minister must decline a referral application if— (a) the application may not be accepted under subsection (1)[1]; or	N/A
(b) the Minister is satisfied that the project involves an ineligible activity; or	The application states that the project does not involve any ineligible activities. CRC agree and are not aware of the activity involving any ineligible activities as defined in Section 5 of the Act.
(c) the Minister considers that they do not have adequate information to inform the decision under this section.	While further information would be required to support a substantive decision, CRC considers that sufficient information has been provided to inform the Minister's decision on referral.
(4) The Minister may decline a referral application for any other reason, whether or not the project meets the criteria in section 22.	This is a matter for the Minister to determine.
(5) Reasons to decline a referral application under subsection (4) include, without limitation, the following: (a) the project would be inconsistent with any of the following: (i) a Treaty settlement: (ii) the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019: (iii) the Marine and Coastal Area (Takutai Moana) Act 2011: (iv) a Mana Whakahono ā Rohe: (v) a joint management agreement:	CRC considers other parties invited to comment on the referral application are the appropriate parties to advise the Minister on these matters.
(b) it would be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts:	The consents sought from the CRC appear to be of low complexity and in all likelihood would be able to be progressed under the RMA. However, CRC understands that other elements of the proposal not related to CRC are likely the reason for pursuing the FTAA pathway. As such, CRC is not currently aware at this point of time of any reasons why the matters to be authorised by the proposed approvals would be more appropriate to deal with under another Act.
(c) the project may have significant adverse effects on the environment:	The referral application contains insufficient detail to determine if the project would have significant effects on the environment. However, based on the information available at present, it is unlikely that the project may have significant adverse effects on the environment.

[1]S21(1) refers to staged and alternative projects Fast-track Approvals Act 2024 | New Zealand Legislation

	This view is preliminary and would need to be confirmed through the substantive application process, including through a full assessment of effects and technical review.
(d) the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) has a poor compliance history under a specified Act that relates to any of the proposed approvals:	CRC is not aware of any recent significant compliance issues in relation to the Applicants.
(e) the project area includes land that the Minister for Treaty of Waitangi Negotiations considers necessary for Treaty settlement purposes:	To CRC's knowledge, this criterion does not apply to the project area.
(f) the project includes an activity that is a prohibited activity under the Resource Management Act 1991[2]:	The Applicant is not seeking approval for a prohibited activity under the RMA.
(g) a substantive application for the project would have 1 or more competing applications:	CRC does not hold a record of any competing applications (per the definition in the FTAA) in the same project area.
(h) in relation to any proposed approval of the kind described in section 42(4)(a) (resource consent), there are 1 or more existing resource consents of the kind referred to in section 30(3)(a).	There are no existing consents of the kind specified in section 30(3)(b) of the FTAA.

CRITERIA FOR ASSESSING REFERRAL APPLICATION – SECTION 22(1-2)

Criteria under Section 22	CRC Comment
(1) The criteria for accepting a referral application are that— (a) the project is an infrastructure or development project that would have significant regional or national benefits; and	The application states that the project will deliver significant economic and community benefits at the regional level. CRC does not consider that the application demonstrates that the section 22 criteria are met. In particular, CRC considers that the evidence does not demonstrate that the proposal would provide significant regional or national benefits.
(b) referring the project to the fast-track approvals process— (i) would facilitate the project, including by enabling it to be	This application requires approvals from multiple authorities and agencies, and the FTAA is therefore likely to facilitate more timely and cost-effective processing.

[2]S21(7) states that a prohibited activity does not necessarily prevent referral Fast-track Approvals Act 2024 | New Zealand Legislation

processed in a more timely and cost-effective way than under normal processes; and (ii) is unlikely to materially affect the efficient operation of the fast-track approvals process	The proposal is unlikely to materially affect the efficient operation of the fast-track approvals process.
(1A) For the purposes of subsection (1)(a), the Minister must consider a relevant Government policy statement.	No Government Policy Statement is applicable to this application.
(2) For the purposes of subsection (1)(a), the Minister may consider— (a) whether the project— (i) has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list:	The project has not been identified as a priority project.
(ii) will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure:	The project does not meet this criterion as it does not comply with the specific definitions for regionally or nationally significant infrastructure provided in the Canterbury Regional Policy Statement and the National Policy Statement on Urban Development.
(iii) will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020):	The project will not result in an increase in housing supply or address housing needs. CRC considers the project will likely contribute to a well-functioning urban environment by enabling a variety of sites for different business sectors.
(iv) will deliver significant economic benefits:	Appendix F and G of the referral application assesses that the project will deliver significant economic benefits. CRC has not engaged an economic expert to review the proposed benefits, but due to the nature and scale of the proposal is not in full agreement that the project will result in significant economic benefits.
(v) will support primary industries, including aquaculture:	This section is not applicable to this proposal.
(vi) will support development of natural resources, including minerals and petroleum:	This section is not applicable to this proposal.
(vii) will support climate change mitigation, including	The Applicant states in section 4.3 of the Referral Application that transport benefits and that design controls on buildings will support minimising the

the reduction or removal of greenhouse gas emissions:	production of greenhouse gas emissions and support climate change mitigation. CRC does not necessarily contest these statements but considers that this is not the primary purpose of the proposal and, accordingly, considers that this criterion has limited relevance to the proposal.
(viii) will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards:	This section is not applicable to this proposal.
(ix) will address significant environmental issues:	This section is not applicable to this proposal.
(ixa) will promote competition in the grocery industry:	This section is not applicable to this proposal.
(x) is consistent with local or regional planning documents, including spatial strategies:	There is insufficient information regarding the proposed mitigation measures and activities to determine whether the proposal is consistent with the relevant regional planning documents. Notwithstanding this, CRC does not consider that the proposal would result in significant adverse effects that are contrary to the objectives and policies of the Canterbury Regional Policy Statement and Land and Water Regional Plan. The site is zoned industrial and rural, with industrial sites located adjacent to the proposal. CRC notes that zoning is a District Council matter and, while it does not consider the proposal inappropriate for the location from a regional perspective, defers to other parties invited to comment on the referral application in relation to the appropriateness of the zoning and land use. CRC understands that there may not be sufficient capacity or appropriate infrastructure in the location to service the site's stormwater and wastewater needs, and that the applicant may be required to seek authorisation for associated discharges under the Land and Water Regional Plan. CRC considers it critical that the servicing and infrastructure requirements are determined prior to a substantive application being lodged, to ensure that the appropriate consents are sought, and the application can be progressed efficiently. **Planning Assessment** **<u>Canterbury Regional Policy Statement 2013</u>** The northern half of the site is located within a Greenfield Priority Area for Business in Map A of the Canterbury Regional Policy Statement (CRPS); thus, this proposal will broadly give effect to the overarching intent of the CRPS by developing land identified for urban business purposes. The consultants' assessment against the CRPS, at Appendix L, is considered appropriate, and it is agreed that the proposal will likely give effect to the identified objectives and policies of the CRPS. **<u>National Policy Statement for Urban Development 2020</u>**

	The National Policy Statement for Urban Development (NPS-UD) seeks to provide for well-functioning urban environments that enable all people and communities to provide for their social, economic and cultural well-being, and for their health and safety, now and into the future. This proposal will achieve the purpose of the NPS-UD by enabling the construction of an industrial area which will contribute to a well-functioning urban environment through the provision of a business activity in an area that is well-connected to surrounding residential and commercial sites and a range of transport options. Considering the consultants' assessment at Appendix L, alongside the summary above, the intent of the NPS-UD is anticipated to be met via this proposal.
(b) any other matters the Minister considers relevant.	This is a matter for the Minister to determine.

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MANA WHENUA ADVICE – FAST TRACK

J8142 – Southwest Industrial Project

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Mahaanui Kurataiao		
***First name**	Tama Te Rangi		
***Last name**	Hamilton-Morrison		
Postal address	226 Antigua St, Christchurch Central		
***Contact phone number**	s9(2)(a)	**Alternative**	
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1.0 Mana Whenua Statement

Ngāi Tahu holds and exercises rangatiratanga within the Ngāi Tahu Takiwā and has done so since before the arrival of the Crown. The rangatiratanga of Ngāi Tahu resides within the Papatipu Rūnanga. The Crown and Parliament have recognised the enduring nature of that rangatiratanga through:

- The 1997 Deed of Settlement (Deed of Settlement) between Ngāi Tahu and the Crown; and
- The 1998 Ngāi Tahu Claims Settlement Act (NTCSA) in which Parliament endorsed and implemented the Deed of Settlement; and
- Article II of Te Tiriti o Waitangi (Te Tiriti);

The contemporary structure of Ngāi Tahu is set down through the Te Rūnanga o Ngāi Tahu Act 1996 (TRoNT Act). Article II of Te Tiriti o Waitangi (Te Tiriti), the TRoNT Act, Ngāi Tahu Claims Settlement Act (NTCSA) 1998, and the 1997 Deed of Settlement (Deed of Settlement) between Ngāi Tahu and the Crown sets the requirements for recognition of tangata whenua in Canterbury.

- Fast-tack Approvals Act 2024 / The Ngāi Tahu Claims Settlement Act

Under the Fast-tack Approvals Act 2024, our comments must be considered with sufficient weighting as expressed under section 7, 18, etc, of the Act. Section 82 applies if a Treaty settlement is relevant. The Ngāi Tahu Claims Settlement Act 1998 covers the takiwā of Ngāi Tahu (as expressed with in Te Runanga o Ngai Tahu Act 1996), including the takiwā of Te Taumutu Rūnanga.

Te Taumutu Rūnanga hold mana whenua over the location of this project.

The Ngāi Tahu Claims Settlement (NTCSA) sought recognition of the relationship between Ngāi Tahu Whānui with the land. The settlement act contains the Crown Apology to Ngāi Tahu where The Crown apologised for its "past failures to acknowledge Ngāi Tahu **rangatiratanga and mana over the South Island lands** within its boundaries" and confirmed that it "recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui". This is marked a turning point, and the beginning of a "**new age of co-operation**". In the NTCSA, the Crown also addresses the "breach of Article Two of the Treaty, it failed to preserve and protect Ngāi Tahu's **use and ownership of such of their land and valued possessions as they wished to retain**."

Section 7(1) of the Fast Track Approvals Act outlines that "all persons performing and exercising functions, powers, and duties under this Act must act in a manner that is consistent with the obligations arising under existing Treaty settlements".

2.0 Summary of Proposal

Mahaanui has been invited to comment on the referral application initiated by Puna Property Holdings Limited and Foddercube Products (Nth Canty) Limtied in accordance with the Fast-Track Approvals Act 2024.

Approval is sought to enable the subdivision and development, for industrial land use, of a ~21.4ha site.

Te Taumutu Rūnanga provided preliminary advice on this proposal in July 2026.

It is our understand that the following consents will be required under the Fast Track process:

- Resource consents under the Resource Management Act 1991 (RMA);
- Wildlife approvals under the Wildlife Act 1953

3.0 Consultation Methodology

Mahaanui Kurataiao Limited review the application documents and undertake an assessment of the information against the Mahaanui Iwi Management Plan.

A briefing report is prepared for Kaitiaki representatives who have been mandated by the Papatipu Rūnanga they represent to speak on behalf of hapū on environmental issues.

A Mahaanui Kurataiao Limited staff member meets with Kaitiaki representatives to discuss the application and Kaitiaki provide feedback based on Mātauranga Māori.

Mana Whenua Advice is provided to outline the relevant policies in the Mahaanui Iwi Management Plan and the feedback provided by Kaitiaki representatives.

[1]Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

The relevant policies and Kaitiaki feedback for this application are provided in the following sections of this report.

4.0 Recommendations and Comments

The below policies from the Mahaanui Iwi Management Plan provide a framework for assessing the potential negative impacts of the proposed activity on Mana Whenua values and provide guidance on how these effects can be moderated.

4.1 Key issues one: Wai Māori

Te Taumutu Rūnanga have expressed concerns regarding the existing potable water supply and wastewater capacity across the takiwā. Freshwater resources across the takiwā are over-allocated or under increasing pressure from abstractive use and this is having a significant effect on the mauri of these resources and the relationship of tāngata whenua to them. On the other hand, wastewater capacity across the region is facing significant strain as a result of ageing infrastructure and rapid urban growth. These issues need to be addressed while providing for inter-generational interests and outcomes, “mō tātou, ā, mō kā uri ā muri ake nei”. This proverb is the Ngāi Tahu vision, and refers to shaping economic development, cultural preservation, and environmental stewardship across Te Waipounamu for future generations.

The prevailing approach to water management has been to prioritise abstractive use over the mauri of the resource, and to commodify and compartmentalise water rather than manage it as a life sustaining taonga. Freshwater management has often been driven by economic considerations to the detriment of the environment and cultural values associated with that environment. The site sits on the border of the Christchurch-West Melton and Selwyn-Waimakariri Groundwater Allocation Zones. It is still crucial that additional takes are not causing further strain on water resources. Water allocation issues in the catchment should be addressed directly through the reduction of abstractive use, rather than finding alternative pathways of consent for water abstraction. Residential development water servicing must be sustainable for future generations.

Waste management and disposal is an issue in the region whereby tāngata whenua often have distinctive cultural perspectives that differ from those of the wider community. Water that contains waste is seen as degraded, even if the waste is treated. If water contains waste, then it cannot be used to harvest mahinga kai. Waste minimisation as an approach to waste management is consistent with protecting cultural values and achieving outcomes set out in this IMP. Reducing the volume of wastewater produced in the takiwā will reduce pressure on existing infrastructure, and on the environment and cultural values.

Te Taumutu Rūnanga are concerned with the capacity of the wastewater infrastructure across Waitaha, when there are a significant number of new developments being proposed. While currently there may be capacity to connect to existing wastewater infrastructure, Te Taumutu Rūnanga are concerned that other developments are not being taken into consideration when council indicate that there is capacity to connect to the existing infrastructure.

[1]Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

It is essential that water resources associated with the development of the Southwest Industrial project must be appropriately protected and managed to ensure they are maintained for future generations. Infilling or piping of water races, flood paths, drains and ephemeral waterways, even if they are deemed to have no ecological value, is not acceptable to mana whenua.

Recommended consent conditions:

1. An assessment and review for water supply and wastewater capacity. Ensuring that three waters infrastructure must have sustainable capacity to incorporate the proposed development.
    a. Mana whenua must be included in decision making regarding three waters infrastructure in the future.
    b. The applicant must provide further information to Te Taumutu Rūnanga, including but not limited to the total expected annual volume, rate of take and environmental effects of water supply servicing for the development, given that the development is located within an overallocated groundwater zone. Proposed water quantity mitigation measures must also be provided to Te Taumutu Rūnanga.
    c. The applicant must provide a report to Te Taumutu Rūnanga, undertaken by a suitably qualified person, on how the development and the proposed water take for servicing this development is going to affect sensitive downstream receptors (springs and waterways and Te Waihora groundwater quantity).
2. Waterways, including Selwyn District Council stock water races, flood paths, drains and ephemeral waterways are not to be piped or closed, except for accessways within the site.

Comments:

- Te Taumutu Rūnanga kaitiaki are interested in connecting with council for discussions around infrastructure capacity.

4.2 Key issue two: Tāne Mahuta

Ngāi Tahu has a particular interest in indigenous biodiversity, both for its inherent value on the landscape and the ecosystem services it provides, and with regard to mahinga kai. Indigenous flora and fauna have sustained tāngata whenua for hundreds of years, providing food, fibre, building materials, fuel, medicine and other necessities. The relationship between tāngata whenua and indigenous biodiversity has evolved over centuries of close interaction and is an important part of Ngāi Tahu culture and identity.

Mahinga kai is the customary gathering of food and natural materials and the places where those resources are gathered. Customary use is the ongoing access to, and sustainable use of mahinga kai resources. The ability of Ngāi Tahu whānui, current and future generations, to access, use and protect mahinga kai resources, and the history and traditions that are associated with those resources, is an issue of immense significance to tāngata whenua in Canterbury. Developments have the potential to negatively affect mahinga kai values if constructed without consideration for the surrounding environment. A high-level ecological assessment of the site determined that there is

[1]Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

potential lizard habitat on site. Lizards are an important mahinga kai resource and taonga species, that must be protected. As there is a potential lizard habitat on site, it must therefore be surveyed to determine if lizards are present so that the appropriate measures can be taken.

Recommended consent conditions:

1. A suitably qualified experienced herpetologist should be employed to survey/scout for native lizards.
    a. Following the surveying/scouting required above, if any native lizards are found to be present on site, mitigation measures must be in place to minimise the negative effects on the herpetofauna, including the trapping and translocation of individuals prior to commencement of earthworks, as well as vegetation clearance during the warmer months, to allow the herpetofauna to naturally relocate themselves away from the site. The trap and transfer of reptiles must be undertaken by a suitably qualified herpetologist.

Comments:

- Te Taumutu Rūnanga kaitiaki support the use of native planting within the landscape plan.

4.3 Key issue three: Kaitiakitanga

Kaitiakitanga is fundamental to the relationship between Ngāi Tahu and the environment. It is the intergenerational responsibility and right of tāngata whenua to take care of the environment and resources upon which we depend. The right for Māori to uphold kaitiakitanga is provided for by Te Titiri o Waitangi and the Crown Apology to Ngāi Tahu. The exercise of kaitiakitanga is enhanced through working alongside the wider community. As tāngata whenua, Ngāi Tahu can bring the community together under a common kaupapa: a healthy environment as the basis for a healthy community and economy.

While kaitiaki of Te Taumutu Rūnanga have been able to provide somewhat of an assessment of mana whenua impacts. Kaitiaki have also identified information and assessments that must be included in the substantive application. Kaitiaki are interested in the opportunity to review new technical documents associated with this development at a pre-substantive stage as well as being a collaborate party in the development of conditions. An ongoing relationship between the applicant and mana whenua provides the chance to achieve better outcomes for both parties.

Comments:

- Interested in reviewing technical information and providing pre-substantive-application advice at later stages.
- Interested in being a collaborate party in the development of consent conditions.
- The recommendations provided in the preliminary advice (J8061) should still be taken into consideration and implemented where appropriate.

[1]Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

5.0 Rūnanga – Affected Party or Not

In terms of this response, Mahaanui Kurataiao has attempted to addresses matters of fundamental concern to Te Taumutu Rūnanga. The fact that Mahaanui Kurataiao has not commented on any particular matter should not be taken as support thereof and Te Taumutu Rūnanga reserves the right to comment on additional matters in a future stage of engagement or when more information becomes available.

The Kaitiaki representatives of Te Taumutu Rūnanga have reviewed this application and provided the recommendations outlined in Section 4.0 to align this proposal more closely with the provisions in the Mahaanui IMP.

6.0 Mahaanui Iwi Management Plan 2013

The Mahaanui Iwi Management Plan (IMP) is a written expression of kaitiakitanga, setting out how to achieve the protection of natural and physical resources according to Ngāi Tahu values, knowledge, and practices. The plan has the mandate of six Papatipu Rūnanga, and is endorsed by Te Rūnanga o Ngāi Tahu, as the iwi authority. The Mahaanui Iwi Management plan is the guiding framework for this report, its contents, and its consent conditions.

Natural resources – water (waterways, waipuna (springs), groundwater, wetlands); mahinga kai; indigenous flora and fauna; ngā tūtohu whenua and land - are taonga to mana whenua and they have concerns for activities potentially adversely affecting these taonga. These taonga are integral to the identity of ngā rūnanga mana whenua and they have a kaitiaki responsibility to protect them. The policies for protection of taonga that are of high significance to ngā rūnanga mana whenua are articulated in the IMP.

Because the Ngāi Tahu Claims Settlement Act recognises Ngāi Tahu as "the tāngata whenua of this takiwā and as holding rangatiratanga within it", the Mahaanui Iwi Management Plan and its associated objectives and policies should be considered under section 82(2) of the Fast Track Approvals Act. This provision requires that the plan, and as such this report, be given "the same or equivalent effect through the panel's decision making as it would have under any relevant specified Act."

The relevant Policies of the IMP to this proposal have been identified as:

5.1 KAITIAKITANGA

K1.1 Ngāi Tahu are the tāngata whenua who hold manawhenua across Ngā Pākihi Whakatekateka o Waitaha and Te Pātaka o Rākaihautū.

K1.2 Te Rūnanga o Ngāi Tahu is the tribal authority representing the collective of Ngāi Tahu whānui as per the Te Rūnanga o Ngāi Tahu Act 1996 and Ngāi Tahu Claims Settlement Act 1998.

[1]Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

K1.3 Papatipu Rūnanga are the regional collective bodies representing the tāngata whenua who hold manawhenua and are responsible for protecting hapū and tribal interests in their respective takiwā.

TE TIRITI O WAITANGI

K2.1 Te Tiriti o Waitangi is an agreement between Ngāi Tahu and the Crown, but Treaty obligations lie with local government as well as central government agencies.

K2.2 The articles of Te Tiriti o Waitangi should be given effect to in accordance with the significance of the treaty to Māori as the founding document of the nation.

K2.3 In giving effect to Te Tiriti, government agencies and local authorities must recognise and provide for kaitiakitanga and rangatiratanga. As the tāngata whenua who hold manawhenua, Ngāi Tahu interests in resource management extend beyond stakeholder or community interests.

K2.4 The articles and principles of the Te Tiriti are the underlying mutual obligations and responsibilities that the Treaty places on both Ngāi Tahu and government agencies and local authorities, and reflect the intention of the Treaty as a whole.

Comment: *Kaitiakitanga is fundamental to the relationship between Ngāi Tahu and the environment. Te Tiriti o Waitangi guarantees tāngata whenua the right to fulfill their kaitiaki obligations to protect and care for taonga in the environment, including land, waterways, natural features, wāhi tapu and flora and fauna with tribal areas.*

5.3 WAI MĀORI

WATER QUALITY

Discharges

WM6.8 To continue to oppose the discharge of contaminants to water, and to land where contaminants may enter water. Controls on land use activities to protect water quality

WM6.16 To require, in the first instance, that all potential contaminants that may enter water (e.g. nutrients, sediments and chemicals) are managed on site and at source rather than discharged off site. This applies to both rural and urban activities.

WATER QUANTITY

Aquifers

WM8.6 To require that aquifers are recognised and protected as wāhi taonga. This means:

(a) The protection of groundwater quality and quantity, including shallow aquifers;

(b) The protection of aquifer recharge;

(c) Ensuring a higher rate of recharge then abstraction, over the long term;

(d) Continuing to improve our understandings of the groundwater resource, and the relationship between groundwater and surface water.

[1]Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

Over-allocated catchments

WM8.7 To require the implementation of an immediate solution to addressing the over-allocation of water in particular catchments, based on a staged approach designed to enable an improved understanding of the local environment and natural resource requirements:

(1) Firstly:

(i) Do not grant any new abstraction or water permit, and place a moratorium on all new land conversions requiring water;

(ii) Do not allow the trading of existing permits;

(iii) Review all existing consents for actual use, using metering; and

(iv) Require the cancellation of consents of not being given effect to, and the surrender of unused allocations (i.e. no transfers of unused water).

(2) Secondly:

(i) Assess the state of the resource (groundwater, waterway);

(ii) Monitor how the resource responds to these measures; and

(iii) Adapt management plans and practices accordingly, acknowledging the principle of matching land use with natural resource limits and availability. If the resource is still degraded, then address issue through a community process, including assessing whether land use (water demand) needs to change.

Controls on land use to protect water quantity

WM8.9 To require controls on specific land use activities that are associated with high water demand, through policies and rules in district and regional plans, to protect surface water flows and groundwater recharge, particularly in water sensitive catchments where the demand for water can be inconsistent with water availability.

REGIONAL WATER INFRASTRUCTURE

WM9.1 To advocate for a takiwā-wide robust evaluation and assessment of the land uses that our freshwater resources are supporting, including the assimilative capacity of the land and the long-term cumulative effects of land use, prior to looking for ways to provide more water.

Evaluating cultural effects and benefits

WM9.4 To critically evaluate the cultural implications of any damming, on-farm storage, community water enhancement schemes, or water storage proposal that may have adverse effects on resources and values of importance to tāngata whenua, with particular regard to:

(a) How the proposal aligns with Ngāi Tahu priorities for water use, as per Policy WM3.1;

(b) Consistency with Ngāi Tahu initiatives to restore waterways and their mahinga kai values;

(c) The nature and extent of transfer and mixing of waters between and within catchments;

[1]Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

(d) The effects of increased water availability and subsequent land use change on surface and groundwater;

(e) Measures to avoid non-point source pollution;

(f) The effects on cultural landscapes sites, features and values;

(g) The effects on coastal ecosystems and processes, including hāpua;

(h) The potential for loss of mahinga kai resources and opportunities (e.g. disruption of fish passage);

(i) Interruption of continuity of flow Ki Uta Ki Tai; and

(j) The cultural imperative to leave the natural environment, including waterways, in a better state for future generations than its current or inherited state

ACTIVITIES IN THE BEDS AND MARGINS OF RIVERS AND LAKES

Riparian areas

WM12.2 To require the protection and restoration of native riparian vegetation along waterways and lakes in the takiwā as a matter of priority, and to ensure that this can occur as a permitted activity.

Use and enhancement of river margins in the built/ urban environment

WM12.4 All waterways in the urban and built environment must have indigenous vegetated healthy, functioning riparian margins.

WM12.5 To require that all waterways in the urban and built environment have buffers or set back areas from residential, commercial or other urban activity that are:

(a) At least 10 metres, and up to 30 metres; and

(b) Up to 50 metres where there is the space, such as towards river mouths and in greenfield areas.

WM12.7 To require all esplanade reserves and esplanade strips established on subdivisions to incorporate native riparian planting.

WETLANDS, WAIPUNA AND RIPARIAN MARGINS

WM13.1 To recognise and protect all wetlands, waipuna and riparian areas as wāhi taonga that provide important cultural and environment benefits, including but not limited to:

(a) Mahinga kai habitat;

(b) The provision of resources for cultural use;

(c) Cultural well-being;

(d) The maintenance and improvement of water quality; and

(e) Natural flood protection.

DRAIN MANAGEMENT

WM14.1 To require that drains are managed as natural waterways and are subject to the same policies, objectives, rules and methods that protect Ngāi Tahu values associated with freshwater, including:

[1]Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

(a) Inclusion of drains within catchment management plans and farm management plans;

(b) Riparian margins are protected and planted;

(c) Stock access is prohibited;

(d) Maintenance methods are appropriate to maintaining riparian edges and fish passage; and

(e) Drain cleaning requires a resource consent.

***Comment**: Water is a significant cultural resource, connecting Ngāi Tahu to the landscape, culture and traditions of the tūpuna. Water is a taonga, and there is a collective responsibility to protect and enhance the mauri of this taonga.*

5.4 PAPATŪĀNUKU

STORMWATER

P6.1 To require **on-site** solutions to stormwater management in all new urban, commercial, industrial, and rural developments (zero stormwater discharge off site) based on a multi-tiered approach to stormwater management:

(a) Education- engaging greater general public awareness of stormwater and its interaction with the natural environment, encouraging them to take the steps to protect their local environment and perhaps re-use stormwater where appropriate;

(b) Reduce volume entering system - implementing measures that reduce the volume of stormwater requiring treatment (e.g. rainwater collection tanks);

(c) Reduce contaminants and sediments entering system – maximising opportunities to reduce contaminants entering stormwater e.g. oil collection pits in carparks, education of residents, treat the water, methods to improve quality; and

(d) Discharge to land-based methods, including swales, stormwater basins, retention basins, and constructed wet ponds and wetlands (environmental infrastructure), using appropriate native plant species, recognising the ability of particular species to absorb water and filter waste.

P6.2 To oppose the use of existing natural waterways and wetlands, and drains, for the treatment and discharge of stormwater in both urban and rural environments.

P6.3 Stormwater should not enter the wastewater reticulation system in existing urban environments.

P6.4 To require that the incremental and cumulative effects of stormwater discharge are recognised and provided for in local authority planning and assessments.

WASTE MANAGEMENT

P7.2 To actively work with local government to ensure that waste management practices protect cultural values such as mahinga kai and wāhi tapu and are consistent with Ngāi Tahu tikanga.

P7.3 To require waste minimisation as a basic principle of, and approach to, waste management. This means reducing the volume of waste entering the system through measures such as:

(a) Education about wise water use;

[1]Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

(b) Composting and recycling programmes;

(c) Incentives for existing and new homes, business, developments and council services to adopt greywater recycling and install low water use appliances; and

(d) On site solutions to stormwater that avoid stormwater entering the wastewater system.

DISCHARGE TO LAND

P8.1 To require that discharge to land activities in the takiwā:

(a) Are appropriate to the soil type and slope, and the assimilative capacity of the land on which the discharge activity occurs;

(b) Avoid over-saturation and therefore the contamination of soil, and/or run off and leaching; and

(c) Are accompanied by regular testing and monitoring of one or all of the following: soil, foliage, groundwater and surface water in the area.

P8.2 In the event that that accumulation of contaminants in the soil is such that the mauri of the soil resource is compromised, then the discharge activity must change or cease as a matter of priority.

EARTHWORKS

P11.1 To assess proposals for earthworks with particular regard to:

(a) Potential effects on wāhi tapu and wāhi taonga, known and unknown;

(b) Potential effects on waterways, wetlands and waipuna;

(c) Potential effects on indigenous biodiversity;

(d) Potential effects on natural landforms and features, including ridge lines;

(e) Proposed erosion and sediment control measures; and

(f) Rehabilitation and remediation plans following earthworks.

Indigenous vegetation

P11.8 To require the planting of indigenous vegetation as an appropriate mitigation measure for adverse impacts that may be associated earthworks activity.

Comment: *Papatūānuku is profoundly important in the Ngāi Tahu worldview, as the birthplace of all things of the world, and the place to which they return. While tāngata whenua recognise the need development, development must be sustainable for the long term and not driven purely by economics and short-term gains.*

5.5 TĀNE MAHUTA

MAHINGA KAI

Ki Uta Ki Tai

TM1.4 To promote the principle of Ki Uta Ki Tai as a culturally appropriate approach to mahinga kai enhancement, restoration and management, in particular:

(a) Management of whole ecosystems and landscapes, in addition to single species; and

[1]Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

(b) The establishment, protection and enhancement of biodiversity corridors to connect species and habitats.

INDIGENOUS BIODIVERSITY

Integrating indigenous biodiversity into the landscape

TM2.8 To require the integration of robust biodiversity objectives in urban, rural land use and planning, including but not limited to:

(b) Use of indigenous plantings as buffers around activities such as silage pits, effluent ponds, oxidation ponds, and industrial sites;

(c) Use of indigenous species as street trees in residential developments, and in parks and reserves and other open space; and

(d) Establishment of planted indigenous riparian margins along waterways.

***Comment**: Ngāi Tahu has a particular interest in indigenous biodiversity, both for its inherent value on the landscape and the ecosystem services it provides, and with regard to mahinga kai. Indigenous flora and fauna have sustained tāngata whenua for hundreds of years, providing food, fibre, building materials, fuel, medicine and other necessities.*

5.8 NGĀ TŪTOHU WHENUA

WĀHI TAPU ME WĀHI TAONGA

CL3.1 All taonga within the takiwā of Ngāi Tahu, accidental discovery or otherwise, belong to the Papatipu Rūnanga/ Te Rūnanga o Ngāi Tahu.

***Comment**: For Ngāi Tahu, cultural heritage isn't something that happened in the past, but rather a reflection of an ongoing and enduring relationship with the land.*

On behalf of Mahaanui Kurataiao Ltd, this report has been prepared by Tama Hamilton-Morrison | Mahaanui Kurataiao Ltd Pou Taiao, and peer reviewed by Grace King | Mahaanui Kurataiao Ltd Pou Taiao.

Date: 13/10/2026

[1]Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

WHITIORA

TO: **ENVIRONMENTAL PROTECTION AGENCY**

RE: **SOUTHWEST INDUSTIRAL - REFERRAL APPLICATION UNDER THE FAST-TRACK APPROVALS ACT 2024 - FTAA-2608-1289**

DATE: **13 OCTOBER 2026**

INTRODUCTION

Ngāi Tūāhuriri is a principal hapū of Ngāi Tahu, acknowledged in Te Rūnanga o Ngāi Tahu Act 1996 and the Ngāi Tahu Claims Settlement Act 1998 (Settlement Act). The takiwā of the hapū is centered at Tuahiwi, and extends from Hurunui to Hakatere, sharing an interest with Arowhenua Rūnanga northwards to Rakaia, and thence inland to the Main Divide. This is articulated in, and discernible from, the Te Rūnanga o Ngāi Tahu (Declaration of Membership) Order 2001 (formerly Schedule 1 of the Te Rūnanga o Ngāi Tahu Act 1996). Within this area, Ngāi Tūāhuriri has maintained noho tūturu (ahi kā), meaning the tribe's 'fires' have been kept burning and that they actively exercise rangatiratanga.

Ngāi Tūāhuriri Rūnanga has mandated Whitiora Centre Limited (Whitiora) to provide advice and act on its behalf in respect of environmental policy, planning, and strategy matters. This includes proposals being referred to or processed as a substantive application under the Fast-track Approvals Act 2024 (FTAA).

PROPOSAL

The Southwest Industrial Project (the Project) proposes the subdivision and industrial land use of approx. 21.4ha site on the southwest urban fringe of Christchurch City. The applicants are Pu Holdings Limited and Foddercube Products (Nth Canty) Limited (the Applicant)

The Project proposes:

- A subdivision to create 36 industrial lots sized between approx. 2,0
- Internal road layout supplemented with native planting
- New intersections and Marshs and Springs Road
- Three waters infrastructure, including integrated sto eas.
- Earthworks, landscaping and all supporting infra to service the new development.

The Project requires the following approvals:

- Resource consents under the Resource Management Act 1991.
- Approvals under the Wildlife Act 1953.

Whitiora received an invitation to comment on the Project from the Environmental Protection Agency on 22 September 2026. Whitiora did not receive notification from the applicant of their intention to lodge a referral application under the FTAA. Whitiora has been in contact with the applicant and accepts that this was an oversight. Whitiora requests that the EPA considers how it can prevent oversights in the future.

SETTLEMENT

The Ngāi Tahu Claims Settlement Act 1998 (NTCSA) records the scope, detail, and nature of the Crown's settlement with Ngāi Tahu. These included:

- An apology
- The return of Aoraki to Ngāi Tahu
- A wide range of mechanisms for economic redress
- A wide range of mechanisms for recognition of mana
- Recognition of, and provision for mahinga kai

THE APOLOGY

The Crown's apology recognised its repeated breaches of the principles of the Treaty of Waitangi purchases of Ngāi Tahu land. This included acknowledgement that the Crown had failed to p protect Ngāi Tahu's use and ownership of such land and valued possessions they wished well as "past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the S within its boundaries."[1]

Within the apology, the Crown recognises Ngāi Tahu as the tāngata wh ng rangatiratanga within, the Takiwā of Ngāi Tahu Whānui. The apol a commitment to enter a new age of co-operation with Ngāi Tahu.

[1] S6 Ngāi Tahu Claims Settlement Act 1998

SPECIAL ASSOCIATION WITH TAONGA SPECIES

The NTCSA also acknowledges the cultural, spiritual, historic, and traditional association of Ngāi Tahu with taonga species which are identified in Schedule 97 of the Act.

RELEVANCE TO THE PROPOSED SUBDIVISION

Matters arising from the Ngāi Tahu Settlement that concern the proposed industrial subdivision include:

a. Where appropriate, to integrate and provide for taonga species within the development, including as part of landscape treatment.

COMMENTS ON APPLICATION

OVERVIEW

Southwest Industrial lies within the takiwā of Ngāi Tūāhuriri. There are no cultural overlays associated with the site. The matters of cultural interest identified are of a general nature and relate to the wider intensification of development in the takiwā.

The proposed land development triggers matters of interest and concern to Ngāi Tūāhuriri Rūnanga. These include the following:

- The management of earthworks including:
    - Run-off from exposed earthworks into waterways causing contaminants to enter the waterway;
    - Dust nuisance;
    - Accidental discovery of Māori artefacts or sites of pre-European origin.
- The management of construction and operational stormwater.
- The cumulative effects on groundwater quality.
- The availability and efficient use of water.
- Reticulation of wastewater.
- The use of indigenous and taonga species as part of landscap

In addition, we emphasise that the preferred approach to land management in the takiwā requires taking an inter-generational view of the environment alongside the capacity of natural resources to absorb the development.[2]

Ngāi Tūāhuriri prefers an approach to land development that is informed by, and responds to, the presence of surface and ground water bodies, biodiversity, retention of trees, retention of springs and the retention of natural landforms, all of which contribute to environmental quality and preserve the physical distinctiveness of specific locations. It is recognized that the proposed Site of this project is largely devoid of these features, however opportunities to provide 'flyways' have been identified.[3] This is supported as a method to support taonga species and wider biodiversity values.

THREE WATERS

It is understood that water supply and wastewater servicing will require off-site connections and potential network upgrades. The details will be established if the Project is successfully referred and a substantive application is developed. Connection to reticulated services is expected; this is supported.

Stormwater is proposed to be treated and discharged to land through dedicated stormwater management areas. The discharge of stormwater to land is generally supported over the discharge to surface water; however, the industrial nature of the proposed activity increases concerns regarding the potential effects on groundwater. Comprehensive assessment of the proposed system and its appropriateness for the proposed activity must be undertaken if the project is successfully referred. Confirmation of the downstream receiving environment must be included in future assessments. Whitiora is particularly interested in any potential effects on water quality in the Te Waihor

Stormwater management areas should be supplemented with appropriate indigen support positive water quality outcomes and wider biodiversity values. All pla implemented in full and maintained to ensure success.

Stormwater management must account for the large increase of associated contaminates from the rezoning to industrial land use. Com ality

[2] Mahaanui Iwi Management Plan, 2013, Chapter 5.4 Pa papa/Policy P1.1.
[3] Riley Payne, Mark Taylor. Industrial Development o igh Level Ecological S 2026, Aquatic Ecology Ltd

monitoring must be undertaken to monitor the composition and impact of stormwater discharges. Every effort must be made to ensure that the quality of water discharged from the site will contribute to the achievement of improved water quality from the wider catchment. In this context, Whitiora expects that a fast-track approval (if applications are successful) will ensure there is an appropriate monitoring regime imposed to ensure that water quality standards will be met.

LANDSCAPE PLANTING AND OPEN SPACES

The intensity of industrial development requires significant planting, maintenance, and protection of greenspaces. Whitiora considers it necessary to mitigate the effects of contaminated run-off from increased hard surface areas.

Proposed landscaping will include boundary planting, green links and reserves, open frontage treatments, and an integrated movement network. These initiatives are supported and planting with appropriate indigenous species is expected. Planting that is designed to improve water quality outcomes is also encouraged. All planting must be implemented in full and maintained to ensure success.

Landscaping informed by identified OBJ opportunities to incorporate flyways through native vegetated corridors is encouraged as a method to support taonga species and interconnectivity between remnant habitats to support wider biodiversity values.

MATTERS TO BE ADDRESSED IN THE SUBSTANTIVE APPLICATION

If the referral application is successful, the following matters should be addressed in the substa application and proposed consent conditions:

- Best practice erosion and sediment control during earthworks;
- Best practice measures for dust management during earthworks;
- An Accidental Discovery Protocol during earthworks;
- Culminative impacts on groundwater quality and other receiving
- Implementation of landscape planting incorporating indigen
- Incorporation of native vegetated corridors as per the e
- Implementation of best practice methods for const se stormwater management;
- Connection to reticulated networks for wa tewater.

SPATIAL PLANNING

If the referral application is successful, further information should be provided on the provisions being made to ensure the coordinated delivery of infrastructure and housing, as anticipated under future special planning legislation.

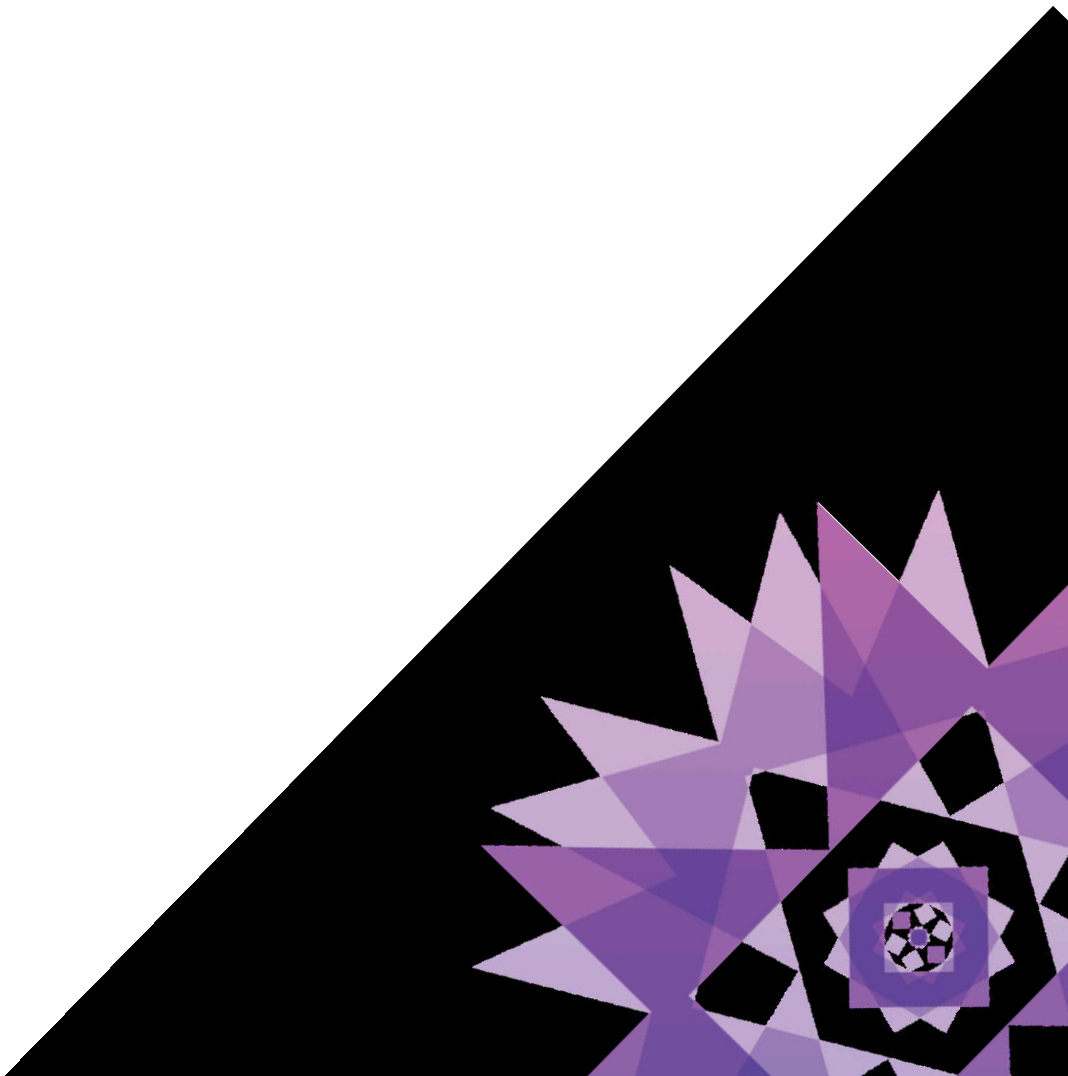
CONTACT DETAILS

Whitiora Centre Limited

351 Lincoln Road, Addington, Christchurch 8024

Email: consents@whitiora.org.nz

Phone: s9(2)(a)



Comments from Selwyn Water Ltd to CRM0139019891 - Saved

Feedback · FTA - Feedback

Portals-Fast Track Portal - ftaa-portal
Owner

Submitted
Portal Status

General | Documents | Related

Feedback Details

Feedback ID	*	FDB002534D6B5
Title	*	Comments from Selwyn Water Ltd to CRM0139019891
Regarding		Selwyn Water Limited - Southwest Industrial
Comments		Selwyn Water Ltd thanks the Panel Convenor for the opportunity to comment. Selwyn Water Ltd is the 2Waters infrastructure provider (drinking water and wastewater) for serviced communities across Waikirikiri Selwyn District. Our shareholder is Selwyn District Council and we provides services under the Statement of Expectations. We have the following comments with respect to this Fast Track proposal: Wastewater: Access to any reticulated wastewater pipework is not available at this time. A pressure pipeline is located in Springs Road, however this is only utilised for emergency purposes. Further we are restricted to its utilisation of this pressure pipeline by agreement with the Christchurch City Council under agreement. Drinking Water: There is no reticulated drinking water service in this location. If the proposed Fast Track development were to request access to the Prebbleton drinking water scheme then this would require a comprehensive water model update be provided. Subject to its outputs, Selwyn Water Ltd would consider the feasibility of a connection. Costs for the model update and any associated advice would be fully carried by the Fast Track applicant.

Feedback Contacts

Created By (Contact)		Hugh Blake-Manson
Source		Portal
Application		Southwest Industrial
Created By		# Portals-Fast Track Portal - ftaa-portal
Created On		7/10/2026 1:45 AM

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

Please upload comments directly via the portal by completing this template.

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

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All information held by MfE is subject to the Official Information Act 1982.

More information on the fast-track approvals process and providing comments can be found at Process overview | Fast-track website

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	FTAA-2608-1289 Southwest Industrial

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	New Zealand Transport Agency		
***First name**	Nicola		
***Last name**	Foran		
Postal address			
***Contact phone number**	s9(2)(a)	**Alternative**	
***Email**	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application

The New Zealand Transport Agency Waka Kotahi ('**NZTA**') has assessed the proposed Southwest Industrial development ('**the Application**') by Puna Property Holdings Limited and Foddercube Products Limited ('**the Applicant**') located at 290, 300, 318, 320, 374 and 376 Springs Road, Halswell, Christchurch. It is understood that the application provides for 36 freehold industrial allotments, an internal road layout, establishment of new intersections to Marshs Road and Springs Road, three waters infrastructure, earthworks, landscaping and supporting infrastructure.

The subject site is located adjacent to the Christchurch Southern Motorway (State Highway 76; (SH76)) and is partially subject to the NZTA designation P23 in the Christchurch District Plan. The purpose of this designation is 'SH76 (Christchurch Southern Motorway Extension - Stage 2) – Motorway'.

In review of the application NZTA considers that the proposed activity will unlikely result in any adverse effects on the effective, efficient and safe function of the state highway network. Access to the site will be via the local road network through the two proposed intersections with Springs Road and at Marshs Road, with no direct access to the state highway. There are unlikely to be any downstream traffic effects on the state highway network. Any signage is likely to be subject to a

specific site assessment and will need to consider the rules of the Christchurch District Plan, which are sufficient to manage any safety effects on the adjacent state highway network.

In relation to the section of the subject site partially subject to the P23 designation, NZTA confirms that the work associated with this designation has been delivered and the legal boundaries in relation to this site have been surveyed and legalised. NZTA is currently working on identifying any areas of designation land that are no longer necessary for the ongoing operation or maintenance of the southern motorway. The designation partially on the subject will be uplifted in due course. If the Applicant is seeking to develop the land prior the partial uplifting of the designation, then NZTA is in a position to provide approval under section 176 of the Resource Management Act 1991.

Additionally, NZTA has been in discussion with the Applicant's consultant, LandPlay Ltd, as they are considering the design layout of the site and are looking at built form within the road boundary setback. NZTA has considered this and advised that there is no concern with the site developing within the road setback area but seek that at least a 2 m setback from the boundary is retained (not including landscaping).

Overall, NZTA is neutral on the proposed Southwest Industrial development by Puna Property Holdings Limited and Foddercube Products Limited. It is considered that there are unlikely going to be any adverse effects on the state highway network and that any built form in this location needs to retain at least a 2m setback from the boundary with the state highway.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Nicola Foran Date 13/10/2026

Your written comments on a project under the Fast-track Approvals Act 2024

Project name	Southwest Industrial

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name	Director-General of Conservation Statutory delegations are in place for the Department of Conservation (DOC / the Department) to provide commentary on behalf of the D-G.		
***First name**	Loren		
***Last name**	Brown		
Postal address	Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011		
***Contact phone number**	s9(2)(a)	**Alternative**	
***Email**	Fast-track@doc.govt.nz;		

2. Please provide your comments on this application

If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manager's signoff



Linda Kirk

13 October 2026

Director-General of Conservation s17 comments

Project name	Southwest Industrial
Applicant name	Puna Property Holdings Limited and Foddercube Products (Nth Canty) Limited
Application number	FTAA-2608-1289
Project summary details	The project is to establish a new 21.4-hectare industrial park on the southwestern urban fringe of Christchurch City, in the Canterbury Region. The project comprises – • subdivision to create 36 freehold industrial lots ranging in size from approximately 0.2 to 1.6 hectares; • internal road layout • establishment of new intersections at Marshs Road and Springs Road • three waters infrastructure including integrated stormwater management areas • earthworks, landscaping and supporting infrastructure required to service the new development. The applicant seeks the following approvals through the fast-track approvals process to authorise the project – • resource consents under the Resource Management Act 1991 • approval under the Wildlife Act 1953. No Public Conservation Land has been identified within the Project area. However, the Record of Title for Section 2 Survey Office Plan 556764 and Section 4 Survey Office Plan 562497 notes that these parts of site are Subject to Part IVA of the Conservation Act 1987.

1 Overview of comments

1.1 Applicant Engagement

1.1.1 As the project includes an approval under a specified Act for which the Director-General of Conservation is the administering agency, the applicant was required to notify DOC and allow 20 working days to respond before lodging the referral application in accordance with section 11.

1.1.2 The applicant did not notify DOC of the application in accordance with section 11.

1.1.3 The applicant believed they had notified DOC of the application on the 3 July 2026 of its intention to lodge a referral application. However, there was a typographical error in the email address and accordingly DOC never received notification.

1.1.4 Accordingly, in the period available specific feedback was not provided.

1.1.5 The application was subsequently lodged by the applicant on the 31 August and DOC was DOC was notified of the application on 22 September 2026 by the Minister of Infrastructure.

1.1.6 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, DOC considers that it is likely that, with the appropriate design and conditions, effects can be managed to appropriate levels.

1.2 Approvals sought

1.2.1 DOC is the administering agency for Wildlife approval that has been listed in the referral application.

1.3 Wildlife approval

1.3.1 The referral application states that the project is likely to require a wildlife approval for lizard salvage and relocation off-site. The applicant has been advised by their consultant ecologist that there are two relatively small pockets of land that could provide habitat for lizards and accordingly this should be explored in the substantive application and a Wildlife Approval will accordingly be sought.

1.3.2 No detail of the lizard species, numbers or the lizard relocation site have been provided and at this stage it is unclear what the Wildlife Approval will specifically seek.

1.3.3 Further detail is provided in Part 2 of these comments.

1.4 Other considerations

1.4.1 The Title for Section 2 Survey Office Plan 556764 and Section 4 Survey Office Plan 562497 notes that these sites are subject to Part IVA of the Conservation Act 1987.

1.4.2 Part IVA of the Conservation Act reserves marginal strips of 20 metres wide in perpetuity along the margin of any qualifying water body on any parcel of land that was once Crown Land. The existence of this notation on the Title means that if a qualifying water body exists on the property, a marginal strip is automatically reserved along that water body. DOC understands this would fall within the definition of ‘public conservation land’ under the FTAA.

1.4.3 It was unclear to DOC from the level of information provided in the referral application whether a qualifying water body under s.24(1) of the Conservation Act exists on the subject property.

1.4.4 However, the applicant has subsequently confirmed to DOC that there is no qualifying waterbody and it appears that there is no public conservation land within the project site. At the time of writing, DOC has not received a request for a s.19 report for this project, which may be reflective of the lack of public conservation land is included within the project site.

1.4.5 DOC does not consider this a reason that the project should not be referred. However, DOC recommends that the Minister confirms with the application that there are no potentially qualifying water bodies on the application site before a substantive application is lodged.

1.5 Conclusion

1.5.1 In conclusion, DOC is not aware of any reason the Project should not be referred. However, DOC highlights that technically the applicant did not notify DOC with the 20 working days of their intention to lodge a referral application and that the application material lodged it is unclear on the status of the Conservation Act notation on the Record of Title.

2 Criteria for Minister's decision on referral application

2.1.1 Sections 21 and 22 of the FTAA set out matters to be considered by the Minister in determining whether a referral application should be accepted.

2.1.2 Comments below are targeted to provisions where DOC has specific interests or information relevant to the Minister's decision.

2.2 Criteria for declining a referral application

2.2.1 Section 21 sets out the criteria for the Minister for declining a referral application. DOC has considered these criteria and provides comments in the table below.

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	Based on the information available, DOC has considered the ineligibility criteria at sections 5(1)(h), (i), (j) and (k), and has not identified any aspect of the Project that would be ineligible based on those criteria.
21(3)(c)	Is there adequate information to inform a decision	The applicant provided a site plan and a very high level ecology scoping letter which details preliminary findings about the ecological setting of the project area. This report indicates the likely presence of lizard habitat onsite and observed avifauna.

Section	Criteria	Comments
		The applicant has not indicated a need to obtain Freshwater Fisheries approvals and it would seem that there are no watercourses on the site. If the project is referred, detailed ecological surveys (including for lizards and avifauna) should be done with methodologies and results provided in the substantive application. This will inform what wildlife approvals will be required for the project. As noted previously, DOC notes that the Titles for several of the lots are subject to Part IVA of the Conservation Act 1987. In the application material there is enough information to DOC to understand whether this contains qualifying water bodies that would require the creation of a marginal strip under this instrument. This issue is explored in greater detail in the discussion under s.22(b). DOC considers the information to be adequate in terms of a referral decision.
21(4)	Are there any other reasons to decline the application?	Based on the information available, DOC has not identified any reason why the Project should be declined.
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	Based on the information available, DOC has not identified any inconsistency with any relevant Treaty settlement or other obligations.
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	Based on the information available, DOC has not identified any reason why the Project should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Based on the information available, DOC considers it is likely that adverse effects of the Project can be addressed through appropriate conditions on any substantive approvals.

Section	Criteria	Comments
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the applicant's compliance history.
21(5)(g)	Would a substantive application have any competing applications	Based on the information available, DOC has not identified any competing applications in respect of conservation approvals.

2.3 Criteria for accepting a referral application

2.3.1 Section 22 sets out the criteria for the Minister for accepting a referral application.

2.3.2 DOC has considered these criteria and has not identified anything where DOC has specific interests or information relevant to the Minister's decision.

3 Other considerations

3.1.1 DOC notes that once a referral decision is made, the scope of any subsequent substantive application is confined by that of the referral application. DOC has provided input to a number of fast-track projects to date where additional conservation approvals that would have been available under the FTAA have not been included in an application. In some of these cases it has been necessary for applicants to seek additional approvals under the specified Acts via normal processing. This can result in inefficiencies, additional costs and undermining of the benefits of the 'one stop shop' approach the FTAA was designed to deliver.

3.1.2 Additional approvals that would potentially be required could be sought by the applicant on a precautionary basis, given the limited assessment needed to be undertaken at the referral stage.

3.1.3 To this end, DOC suggests the Minister consider whether further information should be sought from the applicant under s20 prior to making their decision to ensure all approvals in scope of the FTAA and necessary to implement the project are included.

3.1.4 In particular, DOC recommends consideration is given to whether birds should be included in the scope of wildlife, or other, approvals sought.

3.1.5 Consideration should be given to the proposed release site for any lizards salvaged and any approvals associated with this proposed release.

3.1.6 Given the lack of specific detail in the referral application and the lack of pre lodgement consultation, DOC considers it would be beneficial for the applicant to engage further with DOC as it relates to any conservation approvals (as well as conservation matters subject to RMA consideration) prior to making a substantive application. Benefits include ensuring information necessary to support decision-

making with respect to conservation approvals is included; supporting the management of any actual or potential adverse effects on the environment; and early identification and resolution of any issues.

4 Matters for the Minister to specify (s27)

If the project is referred, it is recommended the Minister request the applicant provide the following information in the substantive application:

- A Lizard Management Plan including details of the off-site lizard relocation site;
- Details of the survey lots to identify any qualifying waterways under Part IVA of the Conservation Act;
- A full ecological assessment, including assessment of actual and potential effects on vegetation, fauna, including avifauna and lizards. Specifically, the ecological assessment should include baseline surveys for lizards, and a baseline avifauna survey which includes species presence and abundance and flight pathways (including for nocturnal and migratory species);
- Details of proposed avoidance and mitigation measures to address effects on ecological values;
- Proposed consent conditions, including details of pre- and post-construction monitoring for the populations of avifauna and lizards;
- If necessary, complete details of any proposed offsetting and compensation measures which are adequate to fully address adverse effects identified in the ecological assessment;
- An outline of consultation with DOC, iwi, and any relevant landowners, including any feedback from the same and an explanation of how that feedback has been addressed.



Linda Kirk
Fast Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 13 October 2026

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Hon Tama Potaka

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing

By email: infrastructure.portfolio@parliament.govt.nz

Tēnā koe Minister Bishop,

Invitation to comment on the Southwest Industrial project under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on the Southwest Industrial project under section 17 of the Fast-track Approvals Act 2024.

I have considered the application and its alignment with my portfolios as Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report.

Nāku noa, nā

Hon Tama Potaka
Te Minita mō Te Arawhiti me Te Minita Whanaketanga Māori
Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand | +64 4 817 6811 | t.potaka@ministers.govt.nz

Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment

6 October 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ- 0039720

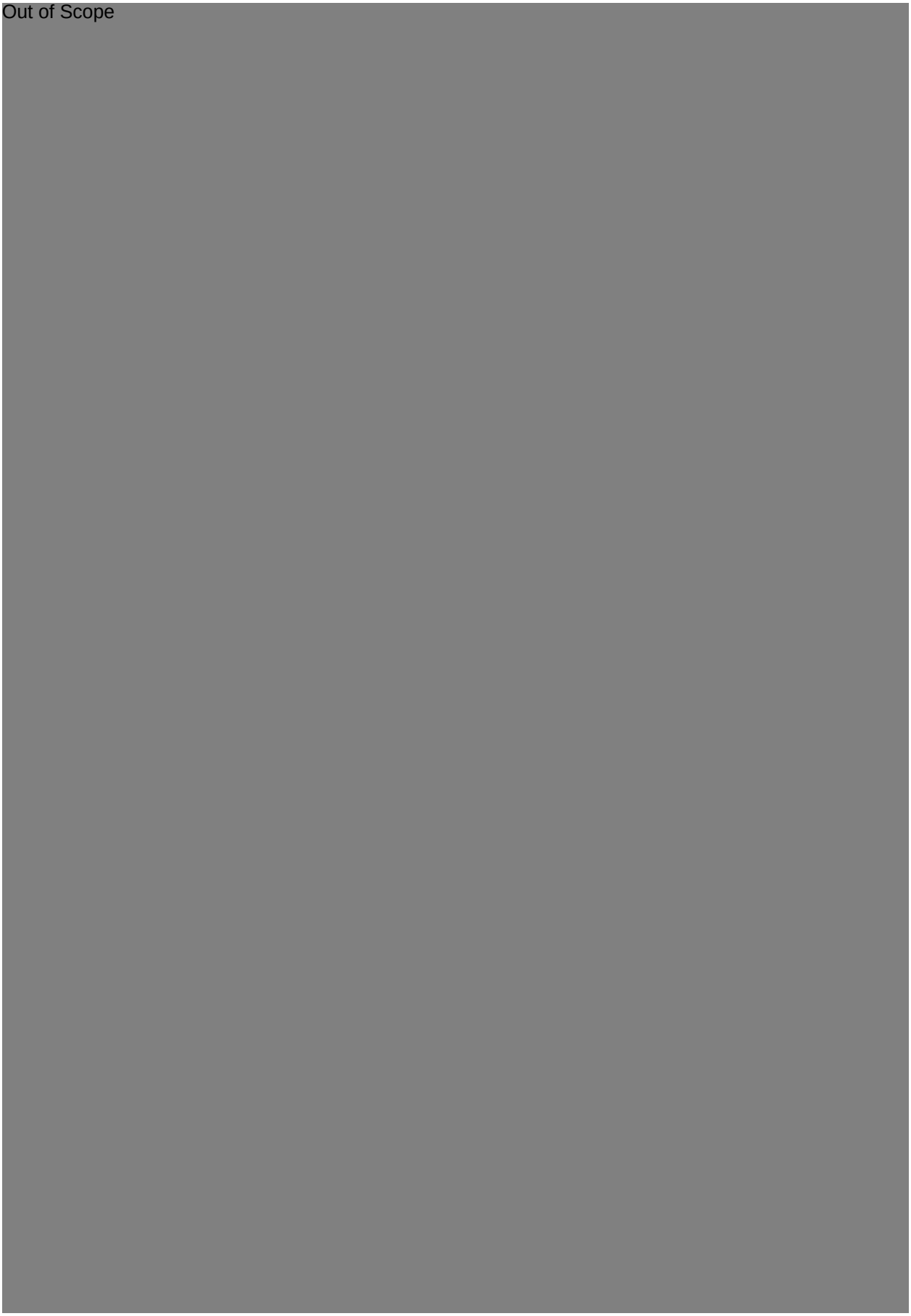
Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on the referral applications for Out of Scope and Southwest Industrial (FTAA-2608-1289).

I am providing these comments in my capacity as Minister for Economic Growth. They focus on whether each application is likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act. For Costco Christchurch, I have also considered whether the application is likely to promote competition in the grocery industry under section 22(2)(a)(ixa). My comments are based on information provided by the applicants, and the quantitative estimates are drawn from their economic assessments.

Out of Scope

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand | +64 4 817 6801 | n.willis@ministers.govt.nz


Out of Scope

Out of Scope

Southwest Industrial, FTAA-2608-1289

The application proposes a 21.4 hectare industrial development in southern Christchurch. It would provide 36 freehold lots for warehousing, logistics, trade services and other light-industrial activities, supported by new roads and servicing infrastructure.

According to the applicant's economic assessment, the project represents approximately $148 million in development expenditure. Over an estimated five-year development period, construction is expected to directly support 183 FTEs. Once fully developed and occupied, onsite activities are estimated to directly contribute $74 million in GDP annually and support 395 ongoing FTEs. The project would also increase freehold industrial capacity in the constrained Hornby South and Islington market, improving choice for businesses seeking to establish or expand in Greater Christchurch.

On balance, the proposal appears likely to deliver significant regional economic benefits under section 22(2)(a)(iv) of the Act through development activity, increased industrial capacity and sustained onsite economic activity. The scale of the ongoing benefits depends on the site being fully developed. The scope, staging and responsibility for any offsite water-supply and wastewater network upgrades will be confirmed through the substantive application process.

Yours sincerely



Hon Nicola Willis
Minister for Economic Growth

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

Please upload comments directly via the portal by completing this template.

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

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All information held by MfE is subject to the Official Information Act 1982.

More information on the fast-track approvals process and providing comments can be found at Process overview | Fast-track website

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Southwest Industrial project

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Selwyn District Council		
***First name**	Geoff		
***Last name**	Deavoll		
Postal address			
***Contact phone number**	s9(2)(a)	**Alternative**	
***Email**	s9(2)(a)		

2. Please provide your comments on this application

If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Delegated signoff



Geoff Deavoll

Principal Planner

Date 13 October 2026

Comments on a fast-track referral application Fast-Track Approvals Act 2024 (FTAA)

Fast-Track Referral Application FTAA-2608-1289 Southwest Industrial Project

General Comment

Selwyn District Council has reviewed the referral application for the Southwest Industrial project proposed under the FTAA, and it is noted that as the project is located within the boundary of the Christchurch City, the Council has been invited to comment under section 17(5) of the FTAA as 'another party', not as the local authority. This is due to the project being located on the boundary with Selwyn District and there being some potential for cross-boundary or infrastructure servicing implications from the project.

While there is potential for some of that type of issue arising from this development, I do not consider these to be of such significance that it be a consideration in deciding on referral of the application. These issues can be further assessed and solutions identified and agreed upon as part of development of a substantive application.

It is noted that the project intends to connect to the wastewater pipe on Springs Road which while it is located within the Christchurch City boundary, it is part of the wastewater network managed by Selwyn Water Limited. While this network connects with the Christchurch City managed wastewater network, it is understood that there are network capacity constraints at points downstream that would affect the ability for this development to connect at this stage. There are also significant capacity constraints in the Selwyn Water managed network that preclude wastewater being accepted by Selwyn Water. The issue will require further consultation between the applicant, Selwyn Water and Christchurch City Council, to find if a viable solution exists.

Effects of the development on the adjacent transport network may affect roads managed by Selwyn District Council, as well as those managed by Christchurch City Council. Again, those effects will be identified and addressed through detailed assessments required for a substantive application and further consultation with both Councils.

The Council expects that where infrastructure to service the development is required, that is unplanned and unfunded, the applicant will be required to meet this cost.

The proposed development will effectively shift the interface between the industrial zone and the rural zone, to the district boundary in this location and closer to the current urban extent of Prebbleton township. Appropriate boundary treatments and adherence to noise standards will be

expected to be addressed in the substantive application to ensure effects of the development at this interface are internalised within the site.

On the basis of the above comments, the Council does not have any objection to referral of this project provided it is found to sufficiently meet the section 22 FTAA criteria and that the costs of unplanned growth are ultimately met by the applicant.

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

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Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

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For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

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Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Southwest Industrial

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Christchurch City Council		
***First name**	Paul		
***Last name**	Lowe		
Postal address			
***Contact phone number**	s9(2)(a)	**Alternative**	
***Email**	s9(2)(a)		

2. Please provide your comments on this application
Please refer to the attached letter for our comments on this application.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

13 October 2026

Max Gander-Cooper
Acting Manager – Fast-track Operations
Fast-track Applications
Environmental Protection Authority
info@fasttrack.govt.nz

03 941 8999

53 Hereford Street
Christchurch 8013

PO Box 73013
Christchurch 8154

ccc.govt.nz

Fast-track Approvals Act 2024 – Christchurch City Council Comments on Referral Application of Southwest Industrial

Application Number:	**FTAA-2608-1289**
Christchurch City Council Reference:	**RMA/2026/3314**
Project Name:	**Southwest Industrial**
Applicant:	**Puna Property Holdings Limited**
	Foddercube Products (Nth Canty) Limited
Address:	**290, 300, 318, 320 & 374 Springs Road, Halswell**

1. The Christchurch City Council ('CCC') received an invitation to provide written comments on the referral application for 'Southwest Industrial' (FTAA-2608-1289) under section 17(1)(a) of the Fast-track Approvals Act 2024 (FTAA).

2. The purpose of this memorandum is to provide comments under section 17(3) of the FTAA, provide answers to the questions from the EPA, and provide general comments that are relevant to the Minister's decision under section 21 of the FTAA.

Executive Summary

3. There are concerns about the feasibility of the project due to the current infrastructure capacity constraints and the availability of funding to provide for additional network capacity required.

4. In relation to wastewater, there is insufficient capacity to support the project, with capacity in the pressure main in Springs Road allocated to Selwyn Water under a Sewerage and Trade Waste Disposal Agreement between Selwyn District Council ('SDC') and CCC. The PS67 Halswell Junction catchment being within a limited wastewater discharge area, which will limit future development to low-water-use activities (such as dry industrial and warehousing activities). A new connection to the water supply network also has the potential to require upgrades to existing water mains to meet firefighting water supply requirements. As a result, the project has implications for the capacity and future planning of the wider supply network.

5. The proposed development is not currently provided for within Council's infrastructure planning or funding programmes and is not programmed for delivery as part of the current 2024-2034 Long Term Plan. Enabling unplanned, out-of-sequence growth places additional pressure on infrastructure and services and can create significant funding challenges. The costs of providing infrastructure capacity to facilitate the development has not been adequately assessed, including costs which would fall on CCC ratepayers, and therefore the overall benefits of the project may be overstated.

6. Any inclusion of projects to enable development and the recovery of costs through DCs would require inclusion of an item (either at a programme level or project level) in the Council's capital programme and DC policy, which would require decisions of Council. Until such a time that the project is included / funded through Council's Capital Programme and DCs policy, Council could not provide the necessary infrastructure or fund the project through DCs .

7. The project is considered to be inconsistent with the Christchurch District Plan and parts of the Canterbury Regional Policy Statement but does address the shortfall in industrial land in the long term as demonstrated through The

Greater Christchurch Business Capacity Assessment – August 2026 Update and contribute towards the requirement of Policy 2 of the National Policy Statement on Urban Development 2020.

8. It is recognised that other matters, including in relation to stormwater, geotechnical, earthworks, and contamination are considered to not be prohibitive of a future development in this location and can be addressed in further detail at any substantive application stage, if the referral application is successful.

9. Section 27(3)(b) provides an opportunity for the Minister to direct information be provided with a substantive application. If a decision to refer the project is made, CCC considers that specific information provided at substantive stage would assist those requested to comment and an expert comment, including:

    - An infrastructure capacity assessment that considers the downstream network capacity, including the capacity of the Christchurch Wastewater Treatment Plant, and capacity required to facilitate the urban growth that has been planned for through the District Plan.

    - An assessment and cost estimation of the upgrades required to facilitate the project, including water, wastewater network, wastewater treatment plant and roading, including how such upgrades will be delivered alongside Council's maintenance, renewal, and upgrade programmes.

    - An economic assessment that considers the net benefits of the project, having regard to infrastructure costs and transfer effects, and provides quantification of the net benefits in regional terms.

    - An assessment as to the potential flooding effects, including any displacement of flood waters from the project.

Prior Council engagement

10. CCC provided a memorandum (dated 3rd August 2026) to the applicant, providing comments under FTAA section 11(1)(c). This memorandum is included as Appendix 1 to this letter and should be read in conjunction with this response.

Scope of comments

11. Noting the timeframe for comments and high-level nature of comments sought, the information provided in this memorandum is of a general nature and not exhaustive.

12. Sections 17(3)(a) and 17(3)(b) provide the scope for Council to provide comments on a referral application.

13. Acknowledging the scope of the comments sought, specific attention has been turned to the matters specified by Mr Max Gander-Cooper, Acting Manager – Fast-track Operations in the letter dated 22 September 2026. These are as follows:

    - *Any application that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such application exist, please provide written confirmation.*

    - *Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act)*

    - *Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of Act)*

    - *Whether the project will have significant regional benefits including addressing the supply of industrial land in Greater Christchurch.*

14. Whilst some specialist comments have been sought on the supporting information with the referral application, due to resourcing and timeframe constraints, not all supporting documents have been reviewed. It is noted that feedback provided is from specialists who are experienced in the coordination of greenfield subdivisions with comprehensive and detailed understandings of the necessary requirements for achieving well integrated, serviced, and designed urban environments.

Site and area context

15. The subject site has been identified as the following:

- 290 Springs Road (Section 2 Survey Office Plan 556764) – 4251m^2
- 300 Springs Road (Section 4 Survey Office Plan 562497) – 2.5040 hectares
- 374 Springs Road (Section 4, 6 Survey Office Plan 550060) – 12.4514 hectares
- 318 Springs Road (Lot 1 DP 82095) – 4.0000hectares
- 320 Springs Road (Section 7 Survey Office Plan 482614) – 2.1270 hectares

Collectively the application site has a total area of 21.5075 hectares.

16. The sites at 290 and 300 Springs Road are located within the Industrial Heavy Zone ('IH') under the District Plan, while the remaining sites are all located within the Rural Urban Fringe Zone ('RuUF'). The site is located at the southern portion of the district boundaries, close to the Selwyn District Council boundary. Located to the west and north of the application site the surrounding area is primarily located within the IH Zone being industrial in character; while the surrounding properties to the east, across the opposite side of Springs Road is located within the RuUF Zone, primarily consisting of rural lifestyle characteristics.

17. As mentioned in previous correspondence, 300 Springs Road has recently had two resource consents granted since the comments under s 11(1)(c) of the Act were provided. A land use consent (RMA/2026/1072) for an industrial building was granted on the 7 August 2026 and a subdivision consent (RMA/2026/1094) to subdivide the lot into two was granted on 19 August 2026. The land-use consent RMA/2026/1072 would be contained within Lot 25 of the proposal.

18. I consider that it relevant to specifically address that 312 Springs Road, which is currently used as a petrol / service station (RMA/2021/2653) does not form part of the application site.

Specific Questions from EPA

19. **Any application that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such application exist, please provide written confirmation.**

While there are no competing applications if a substantive application were to be lodged, an existing land use consent, RMA/2026/1072, would not be competing as the consented building would be located entirely within proposed Lot 25. The previously mentioned two lot subdivision consent RMA/2026/1094 is not considered to be competing, with both consents being able to be implemented independently.

It should also be acknowledged the other applications under the FTAA for large subdivisions in the surrounding area; each being at different stages in the process. While not competing applications, the servicing and infrastructure constraints present for this project will be exacerbated by these other applications. With all applications seeking connections to CCC infrastructure, each of these projects are competing for the ability for connections to both water and wastewater. Attention should also be made specifically to the "John Paterson Estates" FTAA application, which is proposed to be located opposite 290 & 300 Sparks Road and is proposing a new access from Springs Road, with residential allotments also adjoining Springs Road.[1]

20. **Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act).**

The proposal does not appear to include an ineligible activity as per Section 5 of the FTAA.

21. **Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of the Act)**

The project is not considered to meet any of the reasons to decline the referral application under section 21(5) of the FTAA. The potential significant adverse effects on the environment under section 21(5)(c) of the FTAA is discussed further in paragraphs 42-47 of this memorandum, but the primary risk of adverse effects relate to the servicing of the

[1] Currently with no decision on referral being made for the John Paterson Estates application.

site, given the significant constraint of infrastructure to service the project, including the project in addition to the already planned growth within Christchurch.

22. **Whether the project will have significant regional benefits including addressing the supply of industrial land in Greater Christchurch.**

Whether the development will have national or regional benefits is not clear, nor is the extent of any such benefit. The Council has not sought a peer review of the economic report provided with the referral application. Through a high-level review of the information provided, CCC officers question if all the relevant costs associated with the project have been captured (see comments under paragraph 43 regarding wastewater). CCC officers have concerns about servicing constraints and the identified capacity of the network to facilitate this out-of-sequence greenfield subdivision, in addition to the cumulative effect of other proposed referral applications, which were supplied in the CCC memorandum dated 3 August 2026. In relation to the quantification of the proposed benefits, CCC officers do not consider this cost has been appropriately addressed to provide a contextual analysis of the benefits of the project. However, no conclusion is drawn on the overall significant regional or national benefits of the project. Further details regarding this should be supplied with any future substantive application.

The comments provided pre-lodgement in relation to the benefits are also of relevance; these being:

- Whether any economic activity is generated by the developed, or represents a transfer of economic activity that would occur elsewhere, either within the region or nationally.
- Local supply and demand analysis for industrial land/development.
- If activities will be subject to servicing constraints, whether that will impact/reduce the FTEs, wages and GDP and therefore the assumed level of economic activity and benefits.

The project delivering a 36 allotment subdivision with a combined size of 18.057 hectares that are able to be used for industrial purposes (excluding the road and stormwater reserves). While acknowledging the 2.9291 hectares of the application site already zoned for industrial purposes; the project will see a net increase of 15.1279 hectares of industrial land. This may provide a benefit, but further details regarding all the costs associated with the project are needed to determine if the project will have any regional or national benefits that meet the threshold of 'significant', or if any such benefits would be more on the local level.

Within Greater Christchurch, there is a need for the supply of additional industrial land. The Greater Christchurch Business Capacity Assessment – August 2026 Update[2] ('BCA') provides an assessment of the demand for industrial use in Christchurch City and within Greater Christchurch in the short, medium and long term. Within the BCA, the following categories were used:

- Short term – 2025-2028
- Medium term – 2028-2035
- Long term – 2035-2055

The BCA concluded that:[3]

- Greater Christchurch is well positioned to meet the industrial land demand over the next decade; but will face long-term constraints.
- Demand for traditional industrial activities is projected to decline over time, while demand for warehousing and logistics land is expected to increase.
- The future supply of large industrial sites will become increasingly important to meet changing business needs.

[2] https://www.greaterchristchurch.org.nz/assets/Documents/Resources/Monitoring/Greater-Christchurch-Business-Capacity-Assessment-Update-2026.pdf

[3] *Greater Christchurch Business Development Capacity Assessment,* August 2026 update, p.10.

The BCA concludes that there is a surplus in industrial land supply up to the 'medium term', with a shortfall of 460 hectares for Greater Christchurch in the 'long term'; with 443 hectares in this shortfall being within Christchurch City.[4] It is noted that logistics and warehousing are projected to have a significant long term demand of 746.8ha; which requires large sites to provide for these land uses.

Policy 2 of the NPS-UD requires CCC to provide for at least sufficient development capacity for business land over the short, medium and long term. When viewed in the context of the above long term shortfall in business land; I consider that the project will provide for a significant benefit in the increase in industrial development capacity.

General Comments to Assist the Minister

Section 22(1)(a): Significant regional or national benefits

23. Section 22(1)(a) refers to significant regional or national benefits of the project, and Section 22(1)(b) considers whether referring the project to the fast-track approvals process would facilitate the project in a more timely and cost-effective way than under normal processes and is unlikely to materially affect the efficient operation of the fast-track approvals process.

24. Whether the development will have national or regional benefits has been addressed above under paragraph 22.

Section 22(1)(b): Timely and cost-effective

25. It is possible that the referral of the project will enable the relevant approvals / consents to be processed in a more timely and cost-effective way than under the normal processes. A single, unified assessment is expected to be more efficient subject to the provision of all the relevant information at the time a substantive application is made, should the project be referred.

26. A plan change and subsequent resource consent would likely be the avenue through which approval for the project would be sought outside of the FTAA. The procedural step of a plan change would not be required if approval is granted under the FTAA for the project; which may result in a timelier process.

27. CCC Officers have no comments in relation to whether the project would materially affect the efficient operation of the fast-track approvals process.

Section 22(2): Considerations for benefits

28. Section 22(2) details matters which the Minister may consider when assessing a referral application. For efficiency, comment is only provided on the matters which are considered relevant.

29. In terms of section 22(2)(a)(iii) of the FTAA, due to the industrial activity sought, it will not result in an increase in the supply of housing or address housing needs, but the project will see the delivery of additional industrial general land supply. Acknowledging the potential issues involving the servicing of unplanned greenfield development, it is considered that the project could contribute to meeting Policy 1(a)(c) of the National Policy Statement on Urban Development 2020 ('NPS-UD'), if it can be sufficiently serviced with appropriate funding for necessary infrastructure upgrades; thus, would contribute to a well-functioning urban environment.

30. The preliminary economic assessment submitted with the referral application concludes that the project will have significant economic benefits and meet section 22(2)(a)(iv) of the FTAA. Given the limited timeframes provide comments on the project, no external expert economic input has been commissioned to review this report. Taking into account the comments provided below in relation to wastewater capacity and upgrades required; this should be reflected in a revised economic assessment as the infrastructure costs of the project should be accurately considered to determine the economic benefits of the project.

31. In relation to section 22(2)(a)(v) of the FTAA, the project will see the development of LUC 1 productive land and is not considered to support primary industries. The assessment provided against the provisions of the NPS-HPL are discussed further below.

32. In relation to section 22(2)(a)(x) of the FTAA, the project is inconsistent with the local and parts of the Canterbury Regional Policy Statement ('CRPS'). These are discussed further below.

[4] At p.11

Section 22(3) – 22(8): Other sections

33. CCC has no comments regarding these sections of the FTAA as they are not considered to be of relevance to the project.

Local and regional planning documents, including spatial strategies

34. The site is subject to the Christchurch District Plan ('CDP'), zoned Rural Urban Fringe Zone ('RuUF') and Industrial Heavy ('IH') Zone, and subject to a range of overlays, including:

- 33kV Electricity Distribution Lines
- New Zealand Transport Agency (Future Works) Designation (excluding 318 Springs Road);
- Wastewater Discharge Restriction Overlay (290 and 300 Springs Road).
- Industrial Heavy Zone (Springs Road) Outline Development Plan (Appendix 16.8.13)

35. As part of the site is zoned rural, it is not subject to wider spatial strategies seeking to coordinate and facilitate development over a wide area, inclusive of multiple property owners.

36. Progressing development on greenfield land that is not subject to area planning risks disjointed development, small and inefficient facilities, and potential for rework required to upgrade undersized infrastructure in future. Such development would be inconsistent with CDP Strategic Objectives 3.3.1 *Enabling recovery and facility the future enhancement of the district* and 3.3.8 *Urban growth, form and design*, which broadly seek to enable development in an integrated manner.

36.1. In addition to the above mentioned broad strategic direction in with CDP, the project will be inconsistent with the objectives and policies of the Rural Zone. The project is seeking a change in the character of the existing rural environment to being industrial in nature. Thus, being inconsistent with the objective sought within the rural environment which seeks to enhance the function, character and amenity values of the rural environment and seeks to avoid the creation of new sites less than 4ha; with the density and proposed use of the land; the project representing a significant deviation from these objectives and policies.[5]

36.2. No assessment of the CDP objectives and policies were provided with the application in Appendix L (planning assessment). Should the referral application be granted, it is recommended that any application for a substantive decision provide an assessment against these provisions.

37. These provisions are consistent with other local and regional planning documents, in particular:

37.1. The Canterbury Regional Policy Statement ('CRPS'), which sets the resource management aspirations for the Canterbury Region, with Chapters 5 *Land-use and Infrastructure* and 6 *Recovery and rebuilding of Greater Christchurch* particularly relevant to land use and development. These chapters seek to enable land use and development in greenfield priority areas, as shown in Map A of Chapter 6, where well supported by infrastructure, including strategic connections.

37.2. This is further reenforced by the following:

- Policy 6.3.1 – Which seeks to ensure that new urban activities only occur within the existing urban area or areas identified in 'Map A';
- Policy 6.3.3 – Which seeks to ensure that subdivisions must not proceed ahead of the incorporation of an outline development plan; and
- Policy 6.3.5 – That land use development is integrated with infrastructure by identifying priority areas and forward planning infrastructure in these areas; which the project site sits outside of.

The provisions of Chapter 6 of the CRPS largely seeks to ensure that sufficient housing and business capacity is provided within Greater Christchurch by identifying future development areas and greenfield priority areas and

[5] Objective 17.2.1.1 and Policy 17.2.2.7

ensuring that development occurs within these areas. This allowing for the expansion of Christchurch in a planned way with sufficient infrastructure to facilitate greenfield development. The project is located outside of the existing urban area, Greenfield Priority Area or Future Development Area as identified in Map A of the CRPS. It should be noted that Canterbury Regional Council ('CRC') will also provide comments regarding the CRPS and that the inclusions of the aforementioned policies preceded the introduction of the NPS-UD.

37.3. The Greater Christchurch Spatial Plan[6] (GCSP) and the current BCA for Christchurch are also of relevance, with the BCA being discussed above under paragraph 22. The pre-lodgement comments regarding the GCSP are also of relevance here but noting that the GCSP acknowledges additional greenfield development may be required outside of priority areas where the BCA identifies a need for development, and such development is well integrated with existing urban areas.

38. Overall, the project is not considered to be consistent with the Greater Christchurch Spatial Plan, Canterbury Regional Policy Statement, or the Christchurch District Plan; but acknowledging that the parts of the CRPS that the project are inconsistent with preceded the introduction of the NPS-UD.

National Policy Statement for Highly Productive Land

39. The project site is zoned as Rural Urban Fringe. While acknowledging the panel's decision in the Pound Road fast-track decision[7], for the purpose of consideration of the NPS-HPL, the RuUF is the nearest equivalent zone to the General Rural Zone, and therefore the NPS-HPL is a relevant consideration as it relates to the RuUF portion of the project site. This was the conclusion reached in the Ryan's Road fast-track decision.[8] The application includes an assessment of the project against the NPS-HPL by Land Vision Ltd. Specifically, this assessment notes that the application is predominantly categorised LUC1, and therefore 3.10 of the NPS-HPL is relevant.

40. No peer review of this assessment by an agricultural specialist has been undertaken and anticipates that if a substantive application is made, this matter will be addressed further, but considers there are deficiencies in the assessment which render determination of compliance with clause 3.10 of the NPS-HPL unclear. These include the following non-exhaustive matters:

40.1. The assessment considers the scale of the site as a constraint, when sub-clause 4 of 3.10 specifically states that the size of a landholding is not of itself a determinant of a permanent or long-term constraint.

40.2. The Land Vision report does not address the cumulative loss of HPL, specifically the loss of the minimal rural HPL that is present within Christchurch which has seen incremental loss from urban development over time. The report does assess the loss of HPL on a 'regional' scale; but makes broad gross figures of the total of HPL land and does not consider the zoning of the land and exclusions as defined under the NPS-HPL. Noting that the Insight economic assessment previously mentioned and the Land Vision report use differing 'regions' for the corresponding reports. The Land Vision report uses the Canterbury Region; while the Insight economic report uses Christchurch City, Waimakariri and Selwyn as the 'region'.

40.3. The assessment does not sufficiently address the ability for any identified constraint to be addressed through any reasonably practicable options, including consideration of alternate forms of land-based primary production, alternative production strategies, reallocation or transfer of water, and boundary adjustments.

41. Based on the above, further information is required to determine if the project is consistent with the NPS-HPL.

Water supply

42. Comments on water servicing were provided in the memorandum at pre-lodgement stage. The applicant has provided an infrastructure report and concept servicing plans addressing connections to and potential upgrades required for the provision of water supply to the site, which have been reviewed by Ms Michele McDonald, Team Leader Asset Planning Water and Wastewater. Ms McDonalds comments from the memorandum provided at pre-lodgement remain relevant.

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[6] https://www.greaterchristchurch.org.nz/assets/Documents/Work-Programme/Greater-Christchurch-Spatial-Plan/Greater-Christchurch-Spatial-Plan-2024.pdf

[7] Pound Road Industrial Development [FTAA-2505-1057] - Record of Decision of the Expert Consenting Panel under Section 87 of the Fast-Track Approvals Act 2024, Dated 1 May 2026.

[8] Ryans Road Industrial Development [STAA-2504-1054] - Record of Decision of the Expert Consenting Panel under Section 87 of the Fast-Track Approvals Act 2024, Dated 7 May 2026.

Wastewater

43. With regard to the availability of connections to and potential upgrades required for the management of wastewater from the site Ms Michele McDonald, Team Leader Asset Planning Water and Wastewater has reviewed the project information and considers that the comments provided in the pre-lodgement memorandum remain relevant, but has provided the following additional comment:

    43.1. I would also like to highlight that industrial development within the PS67 Halswell Junction catchment has been planned and designed on the basis of limiting wastewater generation to an average dry weather flow of 0.09 L/s/ha, consistent with the applicable District Plan provisions. We have undertaken extensive network and pump station modelling for PS67 Halswell Junction Wastewater Pump Station, and this work has informed the advice provided to date. Based on the modelling completed, further modelling is not expected to alter the conclusions or outcome of that advice.

Stormwater

44. With regard to stormwater Brian Norton, Senior Stormwater Planning Engineer at the Council, has reviewed the project information and considers that the comments provided in the pre-lodgement memorandum remain relevant, but has provided the following additional comment:

    44.1. Stormwater infiltration systems which do not meet the setbacks from water supply wells as described in CRC252424 Condition 32 (Council's Comprehensive Stormwater Network Discharge Consent) will be required to provide a site-specific assessment of contamination risk (32d).

Transport

45. Comments on transport were provided in the memorandum at the pre-lodgement stage of the project. Mr Peter Rodgers, Transport Network Planner at the Council, has confirmed that the comments provided in the pre-lodgement memorandum remain relevant.

Urban design and integration

46. Comments on urban design and integration were provided in the memorandum at the pre-lodgement stage of the project. The comments provided by Mr David Hattam in that memorandum remain relevant.

Natural Hazards

47. While no comments were provided in relation to natural hazards in the pre-lodgement memorandum, CCC officers consider it relevant to note that the project site is located within an area subject to flooding, as identified in the Christchurch City Council Flood and Floor Level Viewer[9]. The project site is shown to be subject to flooding in a 1 in 10, 1 in 50 and 1 in 200 year events. The potential natural hazard effects and mitigation should be addressed in any subsequent substantive application, should the referral application be accepted by the Minister.

Funding of infrastructure upgrades and connections to CCC infrastructure

48. There is currently insufficient water and wastewater capacity to facilitate the project and is not programmed for delivery as part of the current 2024 – 2034 Long Term Plan. Any inclusion of the projects to enable development and the recovery of costs through DCs would require inclusion of an item (either at a programme level or project level) in Council's Capital Programme and DC policy, which will require a decision from elected Council.

49. The Applicant will need to demonstrate how the upgrades to infrastructure can be achieved such that the development can be appropriately serviced, including both the connections to outfalls and downstream infrastructure where capacity is constrained. If unresolved and unfunded, CCC may refuse (under CCC bylaws[10]) any request for infrastructure connections until adequate capacity exists.

General comments

50. It is expected that any substantive application will include assessments to address effects including, but not limited to:

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[9] https://gis.ccc.govt.nz/portal/apps/webappviewer/index.html?id=65b4e2bfc84c4f2e85606cc46bcb6d01

[10] In particular, the **Water Supply and Wastewater Bylaw 2022** and **Stormwater and Land Drainage Bylaw 2022**.

- Noise (from the activity and, in particular heavy vehicles servicing the activity);
- Earthworks;
- Geotechnical matters;
- Natural hazards;
- Transport;
- Contamination
- Indigenous biodiversity and ecosystems; and
- Effects on strategic infrastructure.

51. Council does not hold any information to suggest that assessments containing more information than is typical for a combined subdivision and land use resource consent application would be required to enable comments at substantive stage, if the application is referred.

Vincent Ashman
Senior Planner

Authorised by:



Paul Lowe
Manager Resource Consents
13/10/2026

Appendix 1 – CCC Pre-lodgement comments

3 August 2026

Puna Property Holdings Limited and Foddercude (Nth Canty) Limited
c/- Andrew Ross
LandPlay Limited
Level 1, 169 Madras Street
Christchurch 8011

03 941 8999
53 Hereford Street
Christchurch 8013
PO Box 73013
Christchurch 8154
ccc.govt.nz

By email: s9(2)(a)

Dear Andrew,

Fast-track Approvals Act 2024 – Notification of Intent to Lodge Referral Application

Puna Property Holdings Limited & Foddercude (Nth Canty) Limited – Southwest Industrial

1. The Christchurch City Council (CCC) received a notification from Puna Property Holdings Limited and Foddercude (Nth Canty) Limited advising of their intention to lodge a referral application under section 13 of the Fast-track Approvals Act 2024 (FTAA) to subdivide and use land for industrial purposes.

2. The purpose of this memorandum is to respond to this notification under FTAA section 11(1)(c), and identify matters that the proponent may want to consider prior to lodging a referral application.

Prior Council engagement

3. No prior Council engagement has occurred.

Information provided

4. The information provided with the notification is attached as Appendix 1, being:

   4.1. A draft Fast Track Referral Application (TRIM reference #26/162680).

5. For clarity, it is noted that the following have not been provided:

   5.1. Local supply and demand analysis.

Scope of comments

6. Noting the draft nature of the application provided and time available to respond, the scope of comments in this memorandum is of a general nature and not exhaustive.

Site and area context

7. The site area and context are accurately described in the draft application as:

   "The site is located at 290, 300, 318, 320, 374 and 376 Springs Road and comprises a total of ~21.4 hectares (ha). The site is located on the southwest urban fringe of Christchurch City, in the Christchurch City Council boundary and adjacent to the Selwyn District located ~50m to the south. Access is achieved via Marshs Road to the south and Springs Road to the east.

   The Christchurch Southern Motorway (State Highway 76) forms the northern boundary. The site is located ~350m from a formed access to the State Highway network via Springs Road and Shands Road further to the west.

The site is currently used as a plant nursery, horticultural (turf production) and agricultural (grazing) purposes. An industrial warehouse for Urban Flooring is currently lodged with both City and Regional Council for respective land use applications on the northern portion of the site, within 300 Springs Road.

The character of the surrounding environment is mixed, comprising retail, heavy industrial (north and west), rural-residential properties, agricultural land, major transport corridors that connect Selwyn District to Christchurch City, and established commercial and industrial activities.

To the north, the site adjoins the Christchurch Southern Motorway (State Highway 76), a strategic transport corridor providing connections to the wider transport network.

To the west and north, the surrounding land is within the Christchurch City Council boundaries and is characterised by established industrial activities associated with the Hornby industrial area, as illustrated in orange in the zoning map of Figure 2 below. To the east, the surrounding environment is characterised by rural lifestyle activities with ~2ha lot sizes, each containing a dwelling.

Land to the south and southeast is generally rural lifestyle and within the Selwyn District Council boundary, including commercial activities (retail, landscape supplies, contractors' yard) and the township of Prebbleton located ~750m to the south.

The site is located ~10km southwest of the Christchurch International Airport and has direct access to key transport networks including State Highway 76, Springs Road and Marshs Road. Overall, the surrounding environment reflects the transitional nature of the urban fringe, though Industrial Heavy Zoning currently adjoins Rural Urban Fringe Zoning."

8. Additionally, at 300 Springs Rd which is within the Industrial Heavy zoned part of the site, a landuse consent (RMA/2026/1072) for an industrial building and a subdivision consent (RMA/2026/1094) to subdivide the lot into two, are currently being processed.

Local and regional planning documents, including spatial strategies

9. The site is subject to the Christchurch District Plan, zoned Industrial Heavy and Rural Urban Fringe, and subject to a range of overlays, including:

    9.1. 33kV Electricity Distribution Lines

    9.2. New Zealand Transport Agency (Future Works) Designation (excluding 318 Springs Road);

    9.3. Wastewater Discharge Restriction Overlay (290 and 300 Springs Road).

    9.4. Industrial Heavy Zone (Springs Road) Outline Development Plan (Appendix 16.8.13)

10. Whilst the Industrial Heavy zone part of the site is subject to an Outline Development Plan, the majority of the site is zoned rural, and accordingly is not subject to wider spatial strategies seeking to coordinate and facilitate development over a wide area, inclusive of multiple property owners.

11. Progressing development on greenfield land that is not subject to area planning risks disjointed development, small and inefficient facilities, and potential for rework required to upgrade undersized infrastructure in future. Such development would be inconsistent with Christchurch District Plan (CDP) Strategic Objectives 3.3.1 *Enabling recovery and facility the future enhancement of the district* and 3.3.8 *Urban growth, form and design*, which broadly seek to enable development in an integrated manner.

12. These provisions are consistent with other local and regional planning documents, in particular:

    12.1. The Canterbury Regional Policy Statement (CRPS), which sets the resource management aspirations for the Canterbury Region, with Chapters 5 *Land-use and Infrastructure* and 6 *Recovery and rebuilding of Greater Christchurch* particularly relevant to land use and development. These chapters seek to enable land use and development in greenfield priority areas, as shown in Map A of Chapter 6, where well supported by infrastructure, including strategic connections.

12.2. The Greater Christchurch Spatial Plan[1] (GCSP), which has been adopted by CCC and Selwyn District Council as the Future Development Strategy under the National Policy Statement on Urban Development 2020, to inform the broad locations in which development is anticipated to inform requirements for development and other infrastructure, and transport corridors. The GCSP identifies areas in which greenfield development is anticipated, as shown in Map 14. The GCSP acknowledges additional greenfield development may be required outside priority areas where a Housing and Business Capacity Assessment identifies a need for development, and the development is well integrated with existing urban areas.

13. The proponent should demonstrate the extent to which the development is consistent with the relevant provisions of these documents when the referral application is lodged.

Infrastructure and servicing constraints

Water supply

14. With regard to the availability of connections to and potential upgrades required for the provision of water supply to the site Michele McDonald, Team Leader Asset Planning Water and Wastewater, has noted:

14.1. The proposed development is located within the West Water Supply Zone (WSZ) and is supplied from the PS1117 Wilmers WS Pump Station and Treatment Plant. Provision has been made in the next Council Long-Term Plan for increasing the source capacity associated with PS1117 Wilmers WS to support future growth within the zone.

14.2. We have reviewed the water supply connection options outlined in the Infrastructure Report and advise that a ring-main configuration will be required to provide an appropriate level of network resilience and to meet firefighting water supply requirements.

14.3. The requirements of the draft PAS 4509 - Firefighting Water Supplies Code of Practice may necessitate firefighting flows that exceed the capacity of the existing reticulation network. Accordingly, a detailed assessment of firefighting water supply requirements and network capability will be required as part of any future development application.

14.4. Any required upgrades to the water supply network or associated infrastructure necessary to meet potable water, resilience, and firefighting requirements will need to be identified and funded as part of the development.

Wastewater

15. It is noted that within the draft application, wastewater discharge to Selwyn District is sought however CCC Officers understand that Selwyn District facilities may not have capacity to accept discharges. Accordingly, brief comment on CCC wastewater capacity is given below, should this be sought at a later stage.

16. With regard to the availability of connections to and potential upgrades required for the management of wastewater from the site Michele McDonald, Team Leader Asset Planning Water and Wastewater, has noted:

16.1. Whilst capacity is allocated to service the existing Industrial Heavy-zoned land included within this proposal from PS67 Halswell Junction Road Pump Station (PS67), it should be noted that this area lies within a Limited Sewer Discharge Area as defined by the District Plan. This restricts allowable wastewater discharge rates to 0.09 L/s/ha (average daily flow) and will consequently limit future development to low-water-use activities such as dry industrial and warehousing operations.

16.2. The PS67 Halswell Junction Road Pump Station does not have sufficient spare capacity available to service the Rural Urban Fringe portion of the proposed development.

16.3. The rights and obligations under the existing Sewage and Trade Waste Disposal Agreement between SDC and CCC have been transferred to Selwyn Water Limited (SWL). Under this agreement, SWL retains the right to discharge up to 25 L/s and 250,000 m^3 per financial year of wastewater via the DN175 rising main in Springs Road to PS67.

16.4. Although the Infrastructure Report states that approval to connect will be obtained from SDC (or SWL), it must be clearly acknowledged that approval to receive and convey wastewater remains the responsibility of Christchurch

[1] https://www.greaterchristchurch.org.nz/assets/Documents/Work-Programme/Greater-Christchurch-Spatial-Plan/Greater-Christchurch-Spatial-Plan-2024.pdf

City Council. CCC advises that there is currently no residual capacity available at PS67 Halswell Junction Road Pump Station to accommodate the additional wastewater flows that would be generated by the proposed development.

16.5. CCC has previously requested that SDC relinquish its discharge rates under the Wastewater Agreement; however, SDC declined this request. Accordingly, PS67 Halswell Junction Pump Station does not have sufficient capacity to both preserve the reserved 25 L/s capacity entitlement for SDC/SWL and accommodate additional wastewater discharge from development within Christchurch City Council boundaries, including land zoned Rural Urban Fringe.

16.6. Any upgrade to the PS67 Halswell Junction Road Pump Station would also trigger the need for consequential upgrades to the recently replaced DN250 PE100 rising main, as well as the downstream DN450 and DN525 gravity sewer in Springs Road, to ensure adequate network capacity and performance.

16.7. Accordingly, significant wastewater infrastructure upgrades would be required before the proposed Rural Urban Fringe development could be serviced by the existing wastewater network.

Stormwater

17. With regard to stormwater Brian Norton, Senior Stormwater Planning Engineer, has reviewed the information provided and advised:

17.1. The site will need to provide collective, integrated stormwater management areas (SMAs) that will vest to CCC as new assets. These SMAs will provide treatment via soil adsorption processes (infiltration basins for the runoff from the first 25mm of rainfall on impervious surfaces) followed by detention with disposal of stormwater into land via rapid soakage. The SMAs will be sized to treat and dispose of all roading and hardstand runoff from all allotments. Regardless of infiltration capacity achieved on the site, a minimum above-ground storage volume equal to the runoff volume generated during a 10-year, 18-hour storm will be required within basins (FF basin storage inclusive). Measured rapid soakage rates should be reduced by a factor of 3 to derive design soakage rates. Roof water will be discharged into land via separately sealed networks and rapid soakage within individual allotments. The overall system will need to provide full capture and disposal for the critical 50-year storm for all durations up to 60 hours.

17.2. Individual industrial lots will have consent notices controlling roof materials (no galvanized, copper or Zincalume) and to required gross pollutant traps for pre-treatment of hardstand runoff prior to discharge into the network. Further consent notices may be required to enforce roof/hardstand coverage ratios, depending on the assumptions made for the sizing of the collective SMAs.

17.3. Sites engaging in hazardous activities will require a Stormwater Quality Management Plan and, if considered unacceptably high risk, will be required to obtain their own resource consent for stormwater discharge from ECan. Otherwise, all operational discharges will be able to be covered under CCC's Comprehensive Stormwater Network Discharge Consent (CSNDC). Construction phase discharges, even to land, may also be covered under the CSNDC unless the site is contaminated.

17.4. Predicted flooding within the site appears to be relatively minor and should be able to be mitigated by filling within internal site depressions.

Transport

18. With regard to the existing transport environment and potential effects of a development of this scale, Peter Rodgers, Transport Network Planner has advised:

18.1. He generally agrees with the high level ITA provided noting that additional detailed modelling and design will be required at the substantive application stage to confirm appropriate treatments for the new intersections onto Springs and Marshs roads.

Springs Road intersection

18.2. In addition to the Springs Road / Halswell Junction Road roundabout and state highway on-ramp, the new Springs Road intersection is also a key local access to the development. This future intersection has an existing limitation in that it has a limited length & capacity of the right turn bay due to the bridge abutments of the downstream Springs Road overbridge over the Southern Motorway.

18.3. At the substantive application stage it will be necessary to determine if the length of the right turn bay is long enough such that queuing right turn traffic will not impact upon the southbound arterial traffic flows on Springs Road. This may mean that the new intersection should be restricted to left in / left out.

18.4. Note that there is a consent condition on Tasman Fuels requiring relocation of their vehicle crossing to the new road when that occurs.

18.5. Agreed that the existing shared path should be incorporated into the design, this should both cross Springs Road and extend into the development in order to service the development sites for cycle access.

Little River Cycle link

18.6. Acknowledge no vehicle connectivity to the southern motorway is proposed nor is it possible, however recommend the proponent investigate pedestrian and cycle connections to the Little River Cycle link, particularly from lots with frontage onto this path.

18.7. Recommend the proponent consider an access reserve for off-road pedestrian and cycle link to the Little River Cycle link path. This could be anywhere in the vicinity of lots 22-24 and would serve the remainder of the development for cycle and pedestrian access and may be a more attractive route than the route past Tasman Fuels. Consider swapping Lot 22 and Lot 100 to provide for this.

Roading:

18.8. A minimum legal width of 18m for roads is referred to in the infrastructure report, however 20.0m is shown on the concept plan. 20.0m is preferred. Other than that, the proposed road network is suitable for the industrial development it serves.

Marshs Road intersection

18.9. Note there is an existing vehicle crossing on the south side which may be impacted by the intersection. Marshs Road is also on the boundary with Selwyn District (our understanding is the boundary goes through the centre of the road) and so SDC may have further comment on this intersection.

Funding of infrastructure upgrades and connections to CCC infrastructure

19. Out of sequence development undermines the strategic and phased approach to planning and creates inefficiencies in infrastructure delivery by diverting funding from planned development. This proposal represents such out-of-sequence development. CCC's position is that infrastructure planning and investment needs to occur at a broader scale to achieve efficiencies and effectiveness of infrastructure provision. As this planning has not yet been undertaken for this area, any development at this stage would be ad hoc and may lock CCC into less optimal infrastructure outcomes.

20. In the case of this development, infrastructure upgrades will be required to enable the development to connect to the wider urban network, particularly in relation to wastewater services. Beyond the capital investment needed to upgrade this infrastructure, ongoing operational expenses will be required for maintenance and service delivery. These costs will largely be borne by the CCC.

21. The current Long-Term Plan does not include provision for all expenditure in this area, and these costs are not reflected in the development contributions currently levied. Any decision by CCC to amend these plans to provide infrastructure for this development would require reprioritisation, potentially displacing planned investment in other areas of Christchurch.

22. As the infrastructure required to provide capacity to service this development is not in the current Long-Term Plan or Development Contributions Policy, the CCC has no funding available to provide the infrastructure upgrades. Greenfield development impacts downstream capacity in the wastewater network. If this development was aligned with CCC's area planning, the developer would be required to fund to their share of the cost to provide the infrastructure upgrades with the rest spread over a wider area which the CCC would then recover via development contributions.

23. To address this funding gap identified, the proponent will need to demonstrate how the upgrades to infrastructure can be achieved such that the development can be appropriately serviced, including both the connections to outfalls and

downstream infrastructure where capacity is constrained. If unresolved and unfunded, CCC may refuse (under CCC bylaws[2]) any request for infrastructure connections until adequate capacity exists.

Benefits

24. Whether the development will have national or regional benefits is not clear, nor is the extent of any such benefit. The quantification of benefits should consider:

    24.1. Local supply and demand analysis for industrial land/development.

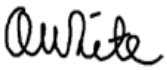
    24.2. If activities will be subject to servicing constraints, whether that will impact/reduce the FTEs, wages and GDP and therefore the assumed level of economic activity and benefits.

    24.3. Whether the development represents a transfer of economic activity that would occur elsewhere, either within the region or nationally.

Conclusion

25. It is recommended that the proponent consider and respond to these matters identified above in any referral application. Pre-application meeting processes are available should further input from CCC be sought prior to the referral application being lodged, subject to staff availability.

Kind regards



Odette White
Senior Planner

Authorised by:



Mal Nash
Team Leader Planning

[2] In particular, the **Water Supply and Wastewater Bylaw 2022** and **Stormwater and Land Drainage Bylaw 2022**.