Ministry for Cities, Environment, Regions & Transport

FTAA-2608-1289: Application received for referral of the project under the Fast-track Approvals Act 2024 – Stage 2 decisions

Project Name: Southwest Industrial

Date submitted	30 October 2026	**Tracking**	26-BRF-02952
Security level	In-Confidence	**Priority**	Urgent

To	Action sought	Response by
Hon Chris Bishop **Minister for Infrastructure**	Decisions on recommendations	6 November 2026

Actions for Minister's Office staff	**Return** the signed briefing to: *FTAreferrals@mcert.govt.nz* **Approve** the attached notice of decisions letter.
Number of appendices: 6	Appendices: 1. Statutory framework for making decisions 2. Application documents for Southwest Industrial 3. Stage 1 Briefing Note and decisions 4. Section 18 Report on Treaty settlements and other obligations 5. Comments received from invited parties 6. Draft Notice of Decisions

Ministry contacts

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

Project location



Figure 1: Southwest Industrial project proposed site plan and location.

Key messages

1. This briefing seeks your decisions under section 21 of the Fast-track Approvals Act 2024 (the Act) on the application from Puna Property Holdings Limited and Foddercube Products (Nth Canty) Limited (the applicant) to refer the Southwest Industrial project (the project) to the fast-track approvals process.
2. A copy of the application is in Appendix 2. This is the second briefing on this application. The first (Stage 1) briefing (26-BRF-02678) with your initial decisions annotated is in Appendix 3.
3. The project is to establish a new 21.4-hectare industrial park on land zoned 'Heavy Industrial' and 'Rural Urban Fringe' on the southwestern urban fringe of Christchurch City, in the Canterbury Region.
4. The project comprises:
    a. subdivision to create 36 freehold industrial lots ranging in size from approximately 0.2 to 1.6 hectares
    b. internal road layout
    c. establishment of new intersections at Marshs Road and Springs Road
    d. three waters infrastructure including integrated stormwater management areas
    e. earthworks, landscaping and supporting infrastructure required to service the new development.
5. The project will require resource consents under the Resource Management Act 1991 (RMA) and approval under the Wildlife Act 1953.
6. The site is fully within the Christchurch City Council boundary, approximately 50 metres north of

Selwyn District. The Christchurch Southern Motorway (State Highway 76) forms the northern boundary of the site.

7. We recommend you **accept** the referral application as the project meets the criteria set out in section 22 and does not appear to involve an ineligible activity.

8. We seek your decisions on this recommendation, on the proposed directions to the applicants and notification of your decisions.

Assessment against statutory framework

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

10. Before accepting the project, you must consider the application (Appendix 2), the section 18 Treaty settlements report (Appendix 4), and any comments from invited parties (Appendix 5). Following that, you may accept the application if you are satisfied that it meets the criteria in section 22 of the Act and if there are no reasons meaning you must decline the application. We provide our advice on these matters below.

Section 18 Treaty settlements and other obligations report (Appendix 4)

11. Under section 18(2), the section 18 report identified Te Rūnanga o Ngāi Tahu, Te Ngāi Tūāhuriri Rūnanga, Te Taumutu Rūnanga, Whitiora Centre Limited and Mahaanui Kurataiao Limited as the relevant Māori groups.

12. The relevant Treaty settlement is the Ngāi Tahu Claims Settlement Act 1998. In its acknowledgements and apology to Ngāi Tahu, the Crown recognised its failures to fulfil its Treaty obligations and commits to a new age of co-operation with Ngāi Tahu. The Crown also recognised Ngāi Tahu as holding rangatiratanga and mana within the takiwā of Ngāi Tahu Whānui. The report does not identify any other principles and provisions of the Treaty settlement, or other obligations under the Act, as directly relevant to this application.

13. You received comments on the application from Whitiora Centre Limited (on behalf of Ngāi Tūāhuriri Rūnanga) and Mahaanui Kurataiao Limited (on behalf of Te Taumutu Rūnanga), both of whom expressed concerns about the management of earthworks, management of water and contaminants, cultural discoveries, and indigenous and taonga species.

14. The report does not identify any matters which would make it more appropriate for the proposed approvals to be authorised under another Act or Acts.

Written comments received (Appendix 5)

15. Comments were received from Canterbury Regional Council (CRC), Christchurch City Council (CCC), three Ministers, the Department of Conservation (DOC), Selwyn District Council (SDC), Selwyn Water Limited (SWL), and NZ Transport Agency Waka Kotahi (NZTA). Comments received from Māori groups are summarised in paragraph 13 above. The key points of relevance to your decisions are summarised in Table A.

16. The key points from the comments are:

    a. CRC is neutral toward referral of the project because it does not consider the project demonstrates it would provide significant regional or national benefits. CRC does not identify any matter that would support declining the application.

b. CCC considered that, while the project is inconsistent with the Christchurch District Plan, it does address the shortfall in industrial land as demonstrated through the Greater Christchurch Business Capacity Assessment 2026. CCC notes concerns about the feasibility of the project due to the current infrastructure capacity constraints and availability of funding to provide for additional network capacity.

c. The Minister for Economic Growth considers the project likely to deliver significant regional economic benefits through development activity, increased industrial capacity and sustained onsite economic activity.

d. The Minister for Māori-Crown Relations: Te Arawhiti and Minister for Māori Development supports the application progressing and encourages the applicant and expert panel to have due regard to relevant Treaty settlement legislation and any feedback received from Māori groups.

e. DOC considers it likely that, with appropriate design and conditions, effects can be managed to appropriate levels.

f. SDC has no objection to the project being referred noting potential effects on wastewater and transport infrastructure will need to be considered at the substantive stage and require further consultation between the applicant, CCC and SDC. It notes the cost of unplanned growth should ultimately be met by the developer.

g. SWL notes that the project site currently does not have access to the SWL wastewater or drinking water networks, and that the feasibility and costs of such connections need to be considered with costs fully met by the developer.

h. NZTA is neutral on the project progressing and considers that the project will be unlikely to result in any adverse effects on the state highway network.

Reasons to decline

17. The statutory framework in Appendix 1 sets out the situations where you must decline the application for referral under section 21(3). We do not consider you must decline this application.

18. You may also decline the application for any other reason under section 21(4). The Act gives some guidance on matters you could consider when deciding whether to decline an application. This is discussed in Table A, and we do not consider you should decline the project for any of these reasons.

Reasons to accept

19. The statutory framework in Appendix 1 sets out the reasons you can accept a project for referral.

20. Our assessment of these matters is summarised in Table A. We consider the project meets the requirements of section 22, as:

    a. it is an infrastructure or development project because it involves the subdivision and development of a greenfield area into industrial lots

    b. it would have significant regional or national benefits because it:

        i. will contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020) [s22(2)(a)(iii)] because:

            (1) of its proximity to existing urban areas of Christchurch

(2) it addresses forecast needs for additional industrial land in an area that services Greater Christchurch

(3) it provides various sized allotments which reflects the functional demands of an accessible industrial development, and associated job opportunities

(4) it is well connected to arterial roads, the state highway network, and public and active transport networks

ii. will deliver significant economic benefits [s22(2)(a)(iv)] because it is estimated to provide approximately 600 full-time equivalent (FTE) years of employment, $54 million in wages and salaries and $106 million in gross domestic product (GDP) over the 5-year development period and, once fully operational, provide approximately 395 onsite FTEs, $37 million in annual wages and salaries and $74 million in annual GDP

c. referring the project to the fast-track approvals process:

i. would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes, by providing a substantially more efficient and timely pathway than the transitional RMA framework with a private plan change and approvals under the RMA, bringing together multiple approval types into a single substantive application process, and due to the Act's limited notification and appeal provisions relative to the RMA.

ii. is unlikely to materially affect the efficient operation of the fast-track approvals process because the project is not overly complex and is neither novel in the New Zealand context nor beyond the scope of what a panel would typically assess where multiple approvals are sought under the fast-track process.

Other matters

21. We have considered whether the scale of the project, at 21.4 hectares and 36 lots, is of a scale comparable with similar projects in the fast-track approvals process. While the scale of this project is less than others in the Greater Christchurch area that panels have approved (e.g. Pound Road Industrial Development at 60.4 hectares and 73 industrial lots, and Ryans Road Industrial Development at 55 hectares and 126 industrial lots), the project addresses the shortfall in industrial land as demonstrated through the Greater Christchurch Business Capacity Assessment 2026 and contribution towards the requirement of Policy 2 of the National Policy Statement on Urban Development 2020. This was noted in comments received from the local authorities. In that context, we therefore consider the project to deliver regionally significant benefits at a scale to be considered for referral.

Conclusions

22. We consider the project meets the section 22 criteria and you could accept the referral application under section 21 of the Act and refer the project to the fast-track approvals process with the specifications outlined below.

23. We consider that if you decide to refer the project, you should specify under section 27 of the Act the following requirements that should apply to the project:

a. Information that must be submitted with the substantive application for the project:

i. Evidence of engagement with DOC on the project, and details of how that engagement has informed the substantive application.

ii. An infrastructure capacity assessment and cost estimation of the three-waters and transport infrastructure upgrades required to deliver the project

b. Selwyn District Council as persons or groups from whom a panel must invite comments from in addition to those specified in section 53 of the Act.

24. These are required for the following reasons:

a. Comments received from DOC advised that, due to the applicant's typographical errors, it did not receive the applicant's notification advice. Our compliance check was informed by the applicant's information that attempts to notify DOC had occurred.

b. CCC and SDC commented that the project is out of sequence with planned growth and therefore has three-waters and transport infrastructure implications. Comments from CCC sought that, should the project be referred, you direct the applicant to include an infrastructure capacity assessment and cost estimation of the three-waters and transport infrastructure upgrades required to deliver the project as part of the substantive application.

c. SDC commented that the project intends to connect to the wastewater pipe on Springs Road which while it is located within the CCC boundary, it is part of the wastewater network managed by Selwyn Water Limited, a SDC controlled organisation. Comments from SDC may inform the panel about relevant infrastructure connectivity matters.

25. We consider the Act's default two-year lodgement deadline would provide sufficient time for the applicant to prepare a substantive application, including the information identified above. We have not identified any particular reason to set a bespoke deadline and therefore recommend the default two-year deadline to lodge a substantive application under section 28(3)(d)(ii) applies.

Next steps

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

27. If you decide to refer the project, the Secretary must also give notice of your decision to:

a. the panel convener

b. any additional iwi authorities or Treaty settlement entities that you consider have an interest in the matter other than those invited to comment under section 17

c. the Environmental Protection Authority (EPA)

d. the relevant administering agencies

28. You must also provide all of the information you received that relates to this application to the EPA and the panel convener, including:

a. the referral application

b. any comments received under section 17

c. the report obtained under section 18.

29. We will undertake this action on your behalf.

30. We have attached a notice of decisions letter to the applicant(s) based on our recommendations (refer Appendix 6) and we will provide it to all relevant parties. We will provide you with an amended letter if required.

31. Our recommendations for your decisions follow.

Recommendations

32. We recommend that you:

a. **Note** section 21(3) of the Fast-track Approvals Act 2024 (the Act) requires you to decline the referral application from Puna Property Holdings Limited and Foddercube Products (Nth Canty) Limited (the applicant) if you are satisfied that the project involves an ineligible activity, or you consider that you do not have adequate information to inform the decision under this section or if you are not satisfied that the Southwest Industrial project (the project) meets the referral criteria in section 22 of the Act.

Noted

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

i. the application in Appendix 2

ii. the report obtained under section 18 in Appendix 4

iii. any comments sought under sections 17 and provided within the required timeframe (if you have received any comments or further information after the required timeframe you are not required to consider them but may do so at your discretion) in Appendix 5

Yes / No

c. **Agree** you are satisfied the project will meet the referral criteria in section 22 of the Act as:

i. it is an infrastructure or development project that would have significant regional or national benefits because it is a development project to subdivide and develop a greenfield area into industrial lots

ii. it would have significant regional or national benefits because it:

(a) will contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020) [s22(2)(a)(iii)] because:

(1) of its proximity to existing urban areas of Christchurch

(2) it addresses forecast needs for additional industrial land in an area that services Greater Christchurch

(3) it provides various sized allotments which reflects the functional demands of an accessible industrial development, and associated job opportunities

(4) it is well connected to arterial roads, the state highway network, and public and active transport networks

(b) will deliver significant economic benefits [s22(2)(a)(iv)] because it is estimated to provide approximately 600 full-time equivalent (FTE) years of employment, $54 million in wages and salaries and $106 million in gross domestic product (GDP) over the 5-year development period and, once fully operational, provide approximately

395 onsite FTEs, $37 million in annual wages and salaries and $74 million in annual GDP

iii. referring the project to the fast-track approvals process:

(a) would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes, by providing a substantially efficient and timelier pathway than the transitional Resource Management Act 1991 (RMA) framework with a private plan change and approvals under the RMA, bringing together multiple approval types into a single substantive application process, and due to the Act's limited notification and appeal provisions relative to the RMA.

(b) is unlikely to materially affect the efficient operation of the fast-track approvals process because the project is not overly complex and is neither novel in the New Zealand context nor beyond the scope of what a panel would typically assess where multiple approvals are sought under the fast-track process.

Yes / No

d. **Agree** there is no reason the project must be declined under section 21(3).

Yes / No

e. **Agree** to accept the referral application under section 21(1) and refer the whole project to the fast-track approvals process under section 26(2).

Yes / No

f. **Agree** to specify Puna Property Holdings Limited and Foddercube Products (Nth Canty) Limited as the persons who are authorised to lodge a substantive application for the project.

Yes / No

g. **Agree** to specify under section 27(3)(b)(ii) of the Act that the following information must be submitted with the substantive application:

i. evidence of engagement with the Department of Conservation on the project, and details of how that engagement has informed the substantive application

Yes / No

ii. an infrastructure capacity assessment and cost estimation of the three-waters and transport infrastructure upgrades required to deliver the project.

Yes / No

h. **Agree** to specify under section 27(3)(b)(iii) of the Act that Selwyn District Council be a person or group from whom a panel must invite comments in addition to those specified in section 53.

Yes / No

i. **Agree** that the default deadline for lodging a substantive application applies under section 28(3)(d)(ii), being two years after the notice of decisions is given to the applicant.

Yes / No

j. **Agree** that the Secretary for the Environment will provide your notice of decisions to:

   i. anyone invited to comment on the application including local authorities and relevant Māori groups

   ii. the panel convener

   iii. the Environmental Protection Authority (EPA)

   iv. the following relevant administering agency: Department of Conservation.

Yes / No

Signatures



Stephanie Frame
Manager – Fast-track Operations

Hon Chris Bishop
Minister for Infrastructure

Date:

Table A: Stage 2 analysis

<table>
<tr><td>Recommendation</td><td colspan="3">Accept the referral application and refer the project to the fast-track approvals process.</td></tr>
<tr><td rowspan="2">Project details</td><td>Project Name</td><td>Applicant</td><td>Project Location</td></tr>
<tr><td>Southwest Industrial (the project)</td><td>Puna Property Holdings Limited and Foddercube Products (Nth Canty) Limited (the applicant)</td><td>The subject site has been identified as the following:
290 Springs Road (Section 2 Survey Office Plan 556764) – 4251m²
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) – 4.0000 hectares
320 Springs Road (Section 7 Survey Office Plan 482614) – 2.1270 hectares</td></tr>
<tr><td>Project description</td><td colspan="3">The project is to 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:
a. subdivision to create 36 freehold industrial lots ranging in size from approximately 0.2 to 1.6 hectares
b. internal road layout
c. establishment of new intersections at Marshs Road and Springs Road
d. three waters infrastructure including integrated stormwater management areas
e. earthworks, landscaping and supporting infrastructure required to service the new development.
The applicant is seeking the following approvals through the fast-track approvals process:
a. resource consents under the Resource Management Act 1991 (RMA)
b. approval under the Wildlife Act 1953.</td></tr>
<tr><td rowspan="2">Minister invites comments / requests information</td><td colspan="3">Comments from invited parties</td></tr>
<tr><td colspan="3">The following section provides a summary of the comments received from invited parties under section 17 of the Act. Full copies of the comments received from Māori groups are included in Attachment 4 of the section 18 report (Appendix 4). Full copies of all other comments received are attached in Appendix 5. All comments were received within the specified timeframe for this application and must be considered.

Local authorities
Canterbury Regional Council (CRC)
- Neutral toward referral of the project
- Does not consider the project demonstrates evidence that it would provide significant regional or national benefits
- Does not consider the project may involve an ineligible activity
- Does not identify any matter that would support declining the application
- Considers the project does not align with the Regional Policy Statement definition of regionally or nationally significant infrastructure
- Considers the project likely to contribute to well-functioning urban environment
- Considers that the applicant’s assertions around climate adaptation and mitigation have limited relevance
- Notes project broadly aligns with Canterbury Regional Policy Statement but needs further assessment if accepted for referral.
- Advises that there are no competing applications or existing consents (section 30(3)(b)) recorded.
Christchurch City Council (CCC)
- Notes that while a portion of the site is zoned ‘Industrial Heavy’ under the Christchurch District Plan, much of the site is zoned ‘Rural Urban Fringe’ and therefore not subject to wider spatial strategies seeking to coordinate and facilitate development over a wide area.</td></tr>
</table>

- Notes the project is out of sequence with infrastructure planning and expressed concerns about the feasibility of the project due to current infrastructure capacity constraints and the availability of funding to provide for additional network capacity required.
- Considers the project (location) 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 (2026) and contribute towards the requirement of Policy 2 of the National Policy Statement on Urban Development 2020.
- Recognises 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.
- Considers that specific information provided at substantive stage would assist those requested to comment and an expert panel, including: an infrastructure capacity assessment, an assessment and cost estimation of the upgrades required to facilitate the project, 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, and an assessment as to the potential flooding effects, including any displacement of flood waters from the project.
- Advises that there are no competing or existing resource consents.

Ministers

Minister for Economic Growth

- Notes the applicant's economic assessment, including approximately $148 million in development expenditure, 183 FTEs over the development period and, once fully developed, estimated to contribute $74 million in GDP annually and support 395 FTEs.
- Notes that 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.
- Considers, on balance, that the project appears likely to deliver significant economic benefits under sections 22(2)(a)(iv) of the Act through development activity, increased industrial capacity and sustained onsite economic activity.

Minister for Māori-Crown Relations: Te Arawhiti and Minister for Māori Development

- Supports the application progressing. Encouraged applicant and panel to have due regard to relevant Treaty settlement legislation and instruments, and feedback from relevant Māori groups, as set out in the Treaty settlements and other obligations (section 18) report.

Māori Groups

Whitiora Centre Limited

- Notes there are no cultural overlays associated with the project site.
- Identifies matters of cultural concern should be addressed through best practice and robust conditions: erosion and sediment control, dust management, accidental discovery protocol, stormwater management, connection to reticulated water/wastewater, efficient use of water, taonga species protection, indigenous vegetation in landscaping.

Mahaanui Kurataiao Limited

- Identifies matters of cultural concern should be addressed through further engagement, best practice and robust conditions: three-water connectivity and efficient use of water, taonga species protection, indigenous vegetation in landscaping.

Administering agencies

Department of Conservation (DOC)

- Notes that, because of a typographical error in the applicant's email to DOC, the section 11 notification was not received. DOC considers it would be beneficial for the applicant to engage further prior to making a substantive application.
- Considers the information insufficient to determine the level of any actual and potential environmental effects but considers it likely that with the appropriate design and conditions, effects can be managed to appropriate levels. Management of any threatened / at-risk species (e.g. lizards) that may be found onsite needs consideration. DOC considers the information to be adequate in terms of a referral decision.
- Notes that two of the Records of Title are subject to Part IVA of the Conservation Act 1987 which 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. DOC notes that, from the level of information provided in the referral application it is unclear whether a qualifying water body under s.24(1) of the Conservation Act exists on the subject property. However, DOC notes 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. DOC notes it has not received a request for a s.19 report for this project, which may be reflective of the lack of public conservation land included within the project site.
- Considers it is not aware of any reason the project should not be referred. No ineligible activities, compliance issues, competing applications. Consider information adequate to inform referral decision.

	- Recommends the Minister request the substantive application include: a lizard management plan, details on any qualifying waterways, a full ecological assessment, including avoidance and mitigation measures, proposed consent conditions for monitoring populations of avifauna and lizards, and outline of consultation with DOC, iwi and relevant landowners. **Any other persons or groups** *NZ Transport Agency Waka Kotahi (NZTA)* - Notes that overall, NZTA is neutral on the project. - Considers that the proposed activity is unlikely to 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. - Considers 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 a 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 land will be uplifted in due course. If the Applicant is seeking to develop the land prior to the partial uplifting of the designation, then NZTA is in a position to provide approval under the RMA. - Notes that it 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-metre setback from the boundary is retained (not including landscaping). *Selwyn District Council (SDC)* - Has no objection to the project being referred if criteria are met. - Notes that the project intends to connect to the wastewater pipe on Springs Road which while it is located within the CCC boundary, it is part of the wastewater network managed by Selwyn Water Limited. While this network connects with the CCC 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 - Notes that effects of the development on the adjacent transport network may affect roads managed by SDC, as well as those managed by CCC. - Notes that the wastewater and transport infrastructure effects will be identified and addressed through detailed assessments required for a substantive application and further consultation with both councils. - Notes that effects on wastewater and transport infrastructure will need to be considered at the substantive stage and require further consultation between the applicant, CCC and SDC. - Notes the cost of unplanned growth should ultimately be met by the developer. *Selwyn Water Limited (SWL)* - SWL notes that the project site currently does not have access to the SWL wastewater or drinking water networks, and that the feasibility and costs of such connections need to be considered with costs fully met by the developer.
The Minister must decline an application if the Minister is satisfied that the project involves an ineligible activity [section 21(3)(b)]	We consider you can be satisfied that the project does not involve an ineligible activity because it: – would not occur on identified Māori land, Māori customary land or a Māori reservation as confirmed by the relevant records of title – would not occur in a customary marine title area or protected customary rights area as it is not in the coastal marine area – is not an aquaculture activity or activity that is incompatible with aquaculture activities that would occur in an aquaculture settlement area and for which the applicant is not authorised to apply for a coastal permit because it will not occur in the CMA – would not require an access arrangement which cannot be granted under the Crown Minerals Act (including s61(1A)) because it does not include an access arrangement, would not occur on Schedule 4 land – would not be prevented by section 165J, M, Q, ZC or ZDB of the RMA because it will not occur in the CMA – would not occur on Schedule 4 land as confirmed by the records of title – would not occur on a national reserve as confirmed by the records of title – would not occur on a reserve held under the Reserves Act 1977 that is managed by or vested in someone other than the Crown or a local authority as confirmed by the record of title – is not a prohibited activity or decommissioning activity under the EEZA, 15B or 15C of the RMA as it does not involve any activity in the EEZ or CMA – is not for the purpose of an offshore renewable energy project because it will not occur offshore.

	No comments raised by parties invited to comment have indicated that the project would be ineligible for referral.
The Minister must decline an application if the Minister considers they do not have adequate information to inform the decision [section 21(3)(c)]	We consider you have adequate information to inform the referral decision.
Relevant considerations and procedural requirements in Treaty settlement, Mana Whakahono ā Rohe, joint management agreement, or the Marine and Coastal Area (Takutai Moana) Act 2011 or the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 [section 16]	N/A
Section 22 assessment criteria	
The project is an infrastructure or development project that would have significant regional or national benefits [section 22(1)(a)]	*The Minister must consider a relevant Government policy statement (GPS) [s22(1A)]* - The only current GPS is the GPS on Grocery Competition. This is not relevant to your decisions on the project. The Minister may consider any of the following matters, or any other matters the Minister considers relevant: *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) [s22(2)(a)(iii)]* - We do not consider the project will increase the supply of housing or address housing needs, as it is not a residential development nor does it have any direct connection to the residential sector. - The applicant's planning assessment (Appendix L of the application) considers the project will contribute to a well-functioning urban environment (within the meaning of Policy 1 of the NPS-UD) by: o providing a meaningful increase to the supply of business land in an area that services Greater Christchurch, particularly southern Christchurch and Selwyn District townships of Lincoln and Prebbleton - two townships have no Industrial zoned land and are located within what has been the fastest growing district in New Zealand o servicing demand in the Canterbury Region and achieves consolidated growth from the urban boundary, forming a logical expansion of an existing industrial zoning and thus significantly contributes to a well-functioning urban environment, in accordance with Policy 1 of the NPS-UD o connecting to key transport networks, both along Springs Road which connects Selwyn District townships of Prebbleton and Lincoln to Christchurch City, as well as State Highway 76 (Christchurch Southern Motorway), achieves Objective 1 of Policy 1 of the NPS-UD. The connection to the State Highway network promotes distribution of movements onto established networks, particularly the southern motorway that joins Christchurch City, Lyttelton Port to the south of Christchurch and the Selwyn District. The project is located adjacent to a main bus network and existing bus stop, two key cycle routes, and roading networks, thus achieving Objective 3 of Policy 1 of the NPS-UD by promoting active transport for future employees o providing various sized allotments which reflects the functional demands of an accessible industrial development, and associated job opportunities, in close proximity to housing. o providing a logical expansion over rural land that has limited production capacity. - CCC considers the project does address the shortfall in industrial land in the long term as demonstrated through the Greater Christchurch Business Capacity Assessment (2026) and contribute towards the requirement of Policy 2 of the NPS-UD. - CRC considers the project will likely contribute to a well-functioning urban environment by enabling a variety of sites for different business sectors. It considers the 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. - We do consider the project contributes to a well-functioning urban environment (within the meaning of policy 1 of the NPS-UD) because: o of its proximity to existing urban areas of Christchurch o it addresses forecast needs for additional industrial land in an area that services Greater Christchurch o it provides various sized allotments which reflects the functional demands of an accessible industrial development, and associated job opportunities

	o it is well connected to arterial roads, the state highway network, and public and active transport networks. - We recommend you can refer the project based on this criterion. *Will deliver significant economic benefits [s22(2)(a)(iv)]* - The applicant attached an economic report by Insight Economics Limited, which estimates the following regionally significant economic benefits: o Development (over 5-years): the project is projected to support approximately 600 FTE years of employment, $54 million in wages and salaries and $106 million in GDP: o Operational (at full build-out): the project is projected to support approximately 395 onsite FTEs, $37 million in annual wages and salaries and $74 million in annual GDP. - The applicant also considers the project will also provide direct and indirect economic benefits to the region, including land supply in the Hornby South and Islington areas, particularly in industrial activities of freight, warehousing, and trade that are recognised as having shortfalls. - CRC notes that due to the nature and scale of the proposal is not in full agreement that the project will result in significant economic benefits, but acknowledges it has not engaged an economic expert to review the proposed benefits - The Minister for Economic Growth noted applicant's economic assessment, including development expenditure, construction and operational figures. The Minister also: o noted that 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 o commented that, on balance, the project appears likely to deliver significant economic benefits under sections 22(2)(a)(iv) of the Act through development activity, increased industrial capacity and sustained onsite economic activity. - We agree with the evidence provided by the applicant and supporting comments from the Minister for Economic Growth. We consider that the project will deliver significant economic benefits and therefore recommend you can refer the project on those grounds. *Will support climate change mitigation, including the reduction or removal of greenhouse gas emissions [s22(2)(a)(vii)]* - The applicant notes the project seeks to minimise the production of greenhouse gas emissions and support climate change mitigation through the following measures: o The site is located close to a key transport route (State Highway 76) in a strategic location to the Christchurch International Airport, Central City and Lyttelton Port, providing efficient transport connections that support logistics operations o The project will reduce commuter distances for residents in Lincoln, Prebbleton, Rolleston and Hornby through providing employment opportunities in close proximity to these urban areas, on the fringe of the established industrial area. o The project's proximity to public transport and connections to established cycle and shared pathways networks. - No quantification is given regarding the extent to which the project would support greenhouse gas emissions reduction or removal, or climate change mitigation (i.e. actual or net reduction in emissions), including in respect of any particular baseline comparator. The application describes potential efficiencies, such as improved access and reduced travel times and building design initiatives to promote reduction in greenhouse gas emissions into the various aspects of the construction and operation, however we do not consider that warrants referral to the fast-track process on the basis of supporting climate change mitigation. - CRC consider this criterion to be of limited relevance, given it is not the primary purpose of this project. - We do not recommend you refer the project on this basis.
Referring the project to the fast-track approvals process [section 22(1)(b)]	*Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes [s22(1)(b)(i)]* - The applicant considers that using the fast-track approvals processes would provide a substantially efficient and timelier pathway than the transitional RMA framework with a private plan change and approvals under the RMA taking an estimated 4–6 years. - CRC notes application requires approvals from multiple authorities and agencies, and the Act is therefore likely to facilitate more timely and cost-effective processing. - Overall, we consider you can be satisfied that referral to Fast-track process would enable the project to be processed in a more timely and cost-effective way than under normal processes, on the basis of the Act bringing together multiple approval types into a single substantive application process, and the Act's limited notification and appeal provisions relative to the RMA. *Is unlikely to materially affect the efficient operation of the fast-track approvals process [s22(1)(b)(ii)]* - The applicant states given the scale and regional significance of the project, it is considered that the referral is unlikely to materially affect the efficient operation of the fast-track approvals process. Rather, the process is specifically intended to facilitate national and regionally significant projects of this nature through a coordinated and streamlined approvals framework.

	- CRC considers that the proposal is unlikely to materially affect the efficient operation of the fast-track approvals process. - We consider the referral is unlikely to materially affect the efficient operation of the fast-track process because the project is not overly complex and is neither novel in the New Zealand context nor beyond the scope of what a panel would typically assess where multiple approvals are sought under the fast-track process.
Reasons to decline	
Minister must decline [section 21(3)]	*The Minister must decline a referral application if:* *The application may not be accepted under subsection 1 (meets referral criteria)* - We consider the application meets the referral criteria. *The Minister is satisfied the project involves an ineligible activity* - We are satisfied the project does not involve an ineligible activity *The Minister considers that they do not have adequate information to inform the decision under this section* - We consider you have adequate information to inform a referral decision. We do not consider that you must decline the application under this section.
Minister may decline [section 21(4) and 21(5)(a-h)]	*The Minister may decline a referral application for any other reason, whether or not it meets the criteria in section 22.* *Reasons to decline a referral application under subsection 4 include, without limitation:* *The project would be inconsistent with a Treaty settlement, Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, Marine and Coastal Area (Takutai Moana) Act 2011, a Mana Whakahono ā Rohe, or a joint management agreement* - Nothing in the application identifies the project as being inconsistent with any Treaty settlement. There are no Mana Whakahono ā Rohe, or a joint management agreement relevant to the application, and Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, Marine and Coastal Area (Takutai Moana) Act 2011 are not relevant due to its location. *It would be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts* - We have not identified any reason that it would be more appropriate to deal with the matters under another Act or Acts. *The project may have significant adverse effects on the environment* - Neither the applicant nor commenters identified reasons that the project should be declined on the basis of significant adverse effects on the environment. - Comments from CRC note that, based on the information available at present, it is unlikely that the project may have significant adverse effects on the environment, but this would need to be confirmed through the substantive application process, including through a full assessment of effects and technical review - Comments from CCC and SDC note the potential for adverse effects on water and transport infrastructure. We consider these matters can be addressed in detail by an expert panel through a substantive application process, informed by comments from the relevant local authorities, with the ability to set conditions to manage these potential effects appropriately. We have also recommended that an infrastructure capacity assessment and cost estimation of the three-waters and transport infrastructure upgrades required to deliver the project to be included with the substantive application to ensure the panel is well informed. - We do not recommend you decline referral on this basis. *The applicant(s) has a poor compliance history under a specified Act that relates to any of the proposed approvals* - The applicant did not identify any compliance history, and no compliance issues have been identified through comments. *The project area includes land that the Minister for Treaty of Waitangi Negotiations considers necessary for Treaty settlement purposes* - The project area does not include this type of land. *The project includes an activity that is a prohibited activity under the Resource Management Act 1991* - The applicant stated there are no prohibited activities proposed. No prohibited activities are identified. *A substantive application for the project would have one or more competing applications.*

	- No competing applications are identified. *In relation to any proposed approval of the kind described in section 42(4)(a) (resource consents), there are one or more existing resource consents of the kind referred to in section 30(3)(a)* - None identified *Conclusion* - We have not identified any other reasons that you may decline the application. - We do not recommend you decline the application.
Specified matters for an accepted referral application	
The Minister may specify any of the matters under section 27(3)	*The Minister <u>may</u> specify any or all of the following under section 27(3) in the notice of decisions letter for an accepted referral application.* *Restrictions that apply to the project (for example, on its geographical location, its duration, or the aspects of the project that may be carried out)* - We have not identified any restrictions that we consider should apply to the project. *In relation to a substantive application for the project:* *A deadline for lodging the application, unless section 27(3)(c) applies* - We recommend the default two-year deadline, under section 27(3)(c), apply. We consider this will provide the applicant for this project sufficient time to prepare a substantive application for lodgement, including the additional information we recommend be required below. *Information that must be submitted with the application* - We recommend you require <u>evidence of further engagement with DOC on the project</u>, and details of how that engagement has informed the substantive application. Comments received from DOC advised that, due to the applicant's typographical errors, they did not receive the applicant's notification advice. Our compliance check was informed by the applicant's information that attempts to notify DOC had occurred. - We recommend you require <u>an infrastructure capacity assessment and cost estimation of the three-waters and transport infrastructure upgrades required to deliver the project</u> because CCC and SDC commented that the project is out of sequence with planned growth and therefore has three-waters and transport infrastructure implications. Comments from CCC sought that, should the project be referred, you direct the applicant to include an infrastructure capacity assessment and cost estimation of the three-waters and transport infrastructure upgrades required to deliver the project as part of the substantive application. *The persons or groups from whom a panel must invite comments in addition to those specified in section 53* - We have identified Selwyn District Council as a person or group from whom a panel must invite comments from in addition to those specified in section 53. This is because SDC noted that the project intends to connect to the wastewater pipe on Springs Road which while it is located within the CCC boundary, it is part of the wastewater network managed by Selwyn Water Limited, a SDC controlled organisation. Comments from SDC may inform the panel about relevant infrastructure matters. - We note that NZTA will likely be invited to comment under section 53(2) as an adjacent landowner. *Whether the substantive application would have any competing applications* - Not applicable – none identified *Whether, in relation to any proposed approval of the kind described in section 42(4)(a) (resource consent), there are any existing resource consents of the kind referred to in section 30(3)(a)* - Not applicable – none identified *Conclusion* - We recommend specifying evidence of further engagement with DOC on the project and an infrastructure capacity assessment and cost estimation of the three-waters and transport infrastructure upgrades required to deliver the project as information to be provided with the substantive application. Other than this, we do not recommend specifying any additional matters under section 27(3) of the Act.

Appendix 1: Statutory framework summary

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