Planning. Traffic. Development.

Fast-Track Approval - Resource Consent Applications & Wildlife Act Permit

prepared for

CARTER GROUP LIMITED

104 Ryans Road and 20 Grays Road, Christchurch

April 2025

Fast-Track Approval - Resource Consent Applications & Wildlife Act Permit

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104 Ryans Road and 20 Grays Road, Christchurch

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Executive Summary

Introduction

1. The Fast Track Approvals Act 2024 (**the Act** or **FTAA2024**) came into force on 23 December 2024, with its purpose being "to facilitate the delivery of infrastructure and development projects with significant regional or national benefits".

2. Within the Act, Schedule 2 lists 149 projects that the Government has determined meet the Act's purpose, granting them direct access to the Fast-track pathway. This includes the project that is the subject of this application and assessment of environmental effects (**AEE**).

Project Overview

3. Carter Group Limited (**CGL**) is seeking fast-track approval to develop a 55-hectare industrial subdivision at 104 Ryans Road, Christchurch, adjacent to Christchurch International Airport (**CIA or Airport**). The project aims to meet the growing demand for industrial land in Canterbury, Christchurch city and in the vicinity of CIA, and particularly for logistics, warehousing, and light manufacturing businesses.

4. The proposed development will deliver 126 freehold industrial lots, with infrastructure such as roads, three-waters utilities, and landscaping. This will provide for its subsequent development for industrial businesses that would be permitted in the Christchurch District Plan's Industrial General zones, including those that would have co-location benefits with the Airport.

5. The project is ready to proceed immediately after receiving the relevant approvals and would likely be completed within 2 years. The applicant has all of the relevant titles under contract to purchase and has funds reserved and set aside for the development of this project and requires no external or bank funding. The applicant is ready to commence development immediately after obtaining the required approvals.

6. The objectives of the project include:

    - Providing **additional industrial land supply** to meet growing demands for general and airport-related industrial land in this location.

    - Creating job opportunities and stimulating economic growth.

    - Ensuring compatibility with the adjacent airport operations.

Economic Benefits

7. The project is expected to deliver significant regional economic benefits, including job creation and contributions to the region's GDP during both construction and operational phases. Specifically:

- **Construction Phase:** The project is estimated to generate a one-off construction effect of $574 million in GDP for the Christchurch economy, supporting 2,205 full-time equivalent (FTE) jobs.

- **Operational Phase:** Once fully occupied, the development will contribute $330 million annually to the Christchurch and Canterbury economies, creating and maintaining 2,770 FTE jobs.

8. In addition to those direct benefits, the land demand assessment, land market assessment and economic assessment provided as part of this AEE all conclude that there is:

- **High demand for** industrial land in Greater Christchurch, Christchurch City, in the airport / Harewood area, and in the warehousing logistics sector; and,

- A corresponding **shortage of supply** of unencumbered, freehold, vacant industrial land which will be exhausted in the short-medium term.

9. The economic assessment also finds that additional economic benefits will also be derived from the project in the form of enhanced industry co-location and market competition, and only modest economic costs associated with the insignificant loss of rural land and production.

10. For these reasons, the economic assessment provided by Market Economics for this project concludes that:

> Based on our analysis, the economic benefits associated with the development of 104 Ryans Road are substantial. The project is expected to generate a one-off total construction effect of $574 million in GDP for the Christchurch economy, spread over multiple construction seasons. This contribution will support employment across a range of sectors, including construction, engineering, professional services, and supply chain industries.
>
> Once fully occupied, the development will have a sustained operational impact, contributing $330 million in GDP annually to the Christchurch and Canterbury economies. This ongoing economic activity will create and maintain employment opportunities across retail, commercial, and service sectors, supporting local businesses and strengthening regional economic resilience.
>
> Given the scale of these benefits, I conclude that the regional economic impacts of this development under the Fast-track Approvals Act are significant. The project will directly contribute to economic growth, job creation, and increased commercial activity, reinforcing the region's economic base and enhancing its ability to support a growing population.
>
> In addition to these regional benefits, the development is expected to generate positive national-level effects. While these may be highly significant for specific industries that operate nationally and will directly benefit from the Ryans Road development, when considered in the context of the overall national economy, they do not reach the threshold of being classified as significant at a national scale. However, industries such as construction, logistics, and materials supply could experience notable gains from the increased demand associated with this large-scale project.

11. Based on the evaluation above, the project is concluded to have **low economic costs** and **significant economic benefits**.

Environmental Effects

12. The assessment of actual and potential effects evaluates the relevant matters listed in Schedule 5, Clause 7 of the Act, including the following specific matters:

Clause 7, Schedule 5 Matters:	Specific Effects Assessed
(a) Any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:	• Economic Effects (including sufficiency of industrial development capacity)
(b) Any physical effect on the locality, including landscape and visual effects:	• Landscape and Visual Amenity Effects • Urban Design Effects • Lighting Effects • Transport Network Effects • Regionally Significant Infrastructure and Reverse Sensitivity Effects • Climate Change and Green House Gas Effects • Highly Productive Soils and Rural Production • Three Waters Infrastructure • Water Quality Effects (Ground and Surface Water)
(c) Any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:	• Ecology and Biodiversity Effects (Herpetology, Freshwater and Avifauna)
(d) Any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:	• Cultural Effects
(e) Any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:	• Earthworks and Land Contamination Effects
(f) Any unreasonable emission of noise:	• Noise Effects
(g) Any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.	• Geotechnical and Flood Hazard Effects

13. Accounting for the expert assessments appended to this AEE, the evaluation of these matters concludes that the proposal will generate no more than **minor** and **acceptable** actual or potential adverse effects on the environment.

Planning Instruments

14. The AEE includes an assessment of the activity against the relevant provisions of the applicable statutory and non-statutory planning instruments (under the RMA) per clause 5 of Schedule 5 of the FTAA2024.

15. It is important to note that given the application is tantamount to a de facto plan change (to urbanise rural land), this assessment:

- Considers policy that legally only applies to plan changes but is still relevant to consider as to whether the application meets national policy aims and objectives, noting that to do otherwise would disregard the intent of those provisions.

- Gives limited weight to strict 'avoidance' policies in RMA planning documents concerning the urban development and use of rural zoned land, given that the FTAA2024 clearly provides for the urbanisation of rural land by way of resource consent (and without the need for rezoning in the first instance).

16. Accounting for the applicable statutory and non-statutory planning instruments and provisions, it is concluded that the proposal is generally **consistent** with the relevant provisions in an overall sense.

Adverse Impacts and s85 of the FTAA2024

17. As summarised above, the proposal is assessed as:

- Having no more than **minor** and **acceptable** actual or potential adverse effects on the environment; and

- Being generally **consistent** with the applicable statutory and non-statutory planning instruments and provisions in an overall sense.

18. Accordingly, there are no adverse impacts that reach the threshold of a “sufficiently significant adverse impact” such that they need to be taken into account in terms of an assessment under s 85 of the FTAA2024.

Conclusion

19. The Ryans Road Industrial Development project is expected to deliver significant regional economic benefits while managing environmental effects to acceptable levels and generally aligning with the relevant planning instruments.

20. The project is consistent with the purpose of the Fast Track Approvals Act 2024, facilitating the delivery of infrastructure and development projects with significant regional benefits.

21. Overall, taking into account the purpose of the Act as the primary consideration, this assessment concludes that there is no basis to decline the approvals sought in this application.

Assessment of Effects on the Environment (AEE)

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Introduction

22. This substantive application is made under the Fast-track Approvals Act 2024 (**FTAA2024** or **the Act**). It is made by Carter Group Limited (**CGL**), by Tim Carter, who is the authorised person for the Ryans Road Industrial Development project listed at Schedule 2 of FTAA2024.

23. CGL propose to subdivide and develop the 55.5 hectare subject site at 104 Ryans Road[1], Christchurch for industrial purposes as described in the applicant's statement attached **as Appendix 1**. This land is currently subject to rural zoning and land use.

24. A comprehensive suite of resource consents covering District Plan, Regional Plan and National Environmental Standard rules and requirements are sought, as detailed below, along with a wildlife permit under the Wildlife Act 1953. This comprises all of the necessary consents authorising and enabling: subdivision and land development, operation of infrastructure services for the site, and the subsequent establishment of industrial activities, buildings and associated site improvements by future businesses.

25. The application seeks the following approvals under s 42(4)(a) (resource consents that would have otherwise been applied for under the Resource Management Act 1991 (**RMA**)) and s 42(4)(h) (wildlife approvals as defined in clause 1 of Schedule 7) of the FTAA2024:

- **Subdivision consent:** For 126 industrial lots and infrastructures /service lots (a non-complying activity).
- **Land use consent:** For future industrial activities, buildings and site improvements (a non-complying activity).
- **Water permit:** For the discharge of construction and operational phase stormwater (roads to stormwater basin and global consent for 126 lots discharging stormwater to ground) (a non-complying activity).
- **Water permit:** To take water for construction purposes (drain damming and diversion) (a discretionary activity).
- **Land-use consent:** To undertake earthworks over an aquifer and within riparian margins (including vegetation clarence) and to install a culvert in the bed of a drain (a restricted discretionary activity).
- **Wildlife Permit:** To authorise the trapping and relocation of native lizards (should they be found at the site).

26. The application complies with the requirements of s43 of the FTAA2024 and notably, it does not involve any ineligible activities as defined by s 5 (s 13(4)(c)). Schedule 5 (clauses 5 - 8) of the Act sets out the information requirements for persons making an application for resource consent or subdivision consent (that would have otherwise been applied for under the RMA). The

[1] The subject site also includes the property known as 20 Grays Road, however for brevity, this AEE refers to the site as 104 Ryans Road.

following assessment and its associated appendices are made in accordance with these requirements.

27. Schedule 7 (clause 2) sets out the information requirements for wildlife approval. The assessment contained in **Appendix 7** is made in accordance with these requirements.

Site and Surrounding Environment

Site Particulars

Site Name	Parcel	Title(s)
104 Ryans Road, Yaldhurst, Christchurch	Lot 4 DP 22679 Area: 31.536 ha	CB7A/401
20 Grays Road, Yaldhurst, Christchurch	Part Lot 1 DP 2837 Area: 2.113 ha	CB7A/401
Part Lot 3 DP 22679	Part Lot 3 DP 22679 Area: 23.954 ha	CB13A/1098

Site and Surrounding Environment Description

The Application Site

28. The application site (hereafter referred to as **the site** or **104 Ryans Road**) is located in the suburb of Yaldhurst, which is situated on the western rural-urban fringe of Christchurch City.

29. The site is identified in Figure 1 and Figure 2 below with the records of title attached as Appendix 2.

30. The subject land is legally described as Pt Lot 3 DP 22679, Lot 4 DP 22679 and Pt Lot 1 DP 2837 and has a total area of approximately 57.64 hectares (**ha**), of which the 55.5ha comprised of Lot 4 DP 22679 and Part Lot 3 DP 22679 is proposed to be subdivided and developed for industrial uses. The balance of the land at Part Lot 1 DP 2837 is proposed to provide for stormwater and water utility requirements and a balance area. For the purposes of this report and where a distinction is required from the site as a whole, these areas are referred to as the **industrial block** and **balance block,** respectively,

31. The industrial block is situated on the north side of Ryans Road, to the west of Grays Road and adjacent to Christchurch International Airport to the north (being approximately 170m from the end of the main north-south runway). The balance block sits on the east side of Grays Road, opposite the industrial block.

32. In the southeast corner of the industrial block, is an old, abandoned dwelling, clustered with various farm storage sheds and water tanks. This section of the site is enclosed and interspersed with tall established exotic trees and hedging. The site is generally flat with a gentle slope from west to east and predominantly consists of grassed paddocks with some vegetation around the property.

33. Boundary treatments along the Ryans and Grays Road extents of the site include typical post and wire farm fencing coupled with low hedging. Where the site adjoins the airport, a higher (2-3 metre high) chain-link fence topped with barbed wire sections and electric fencing has been installed as a safety measure, as well as a section of timber batten fencing of the same height.

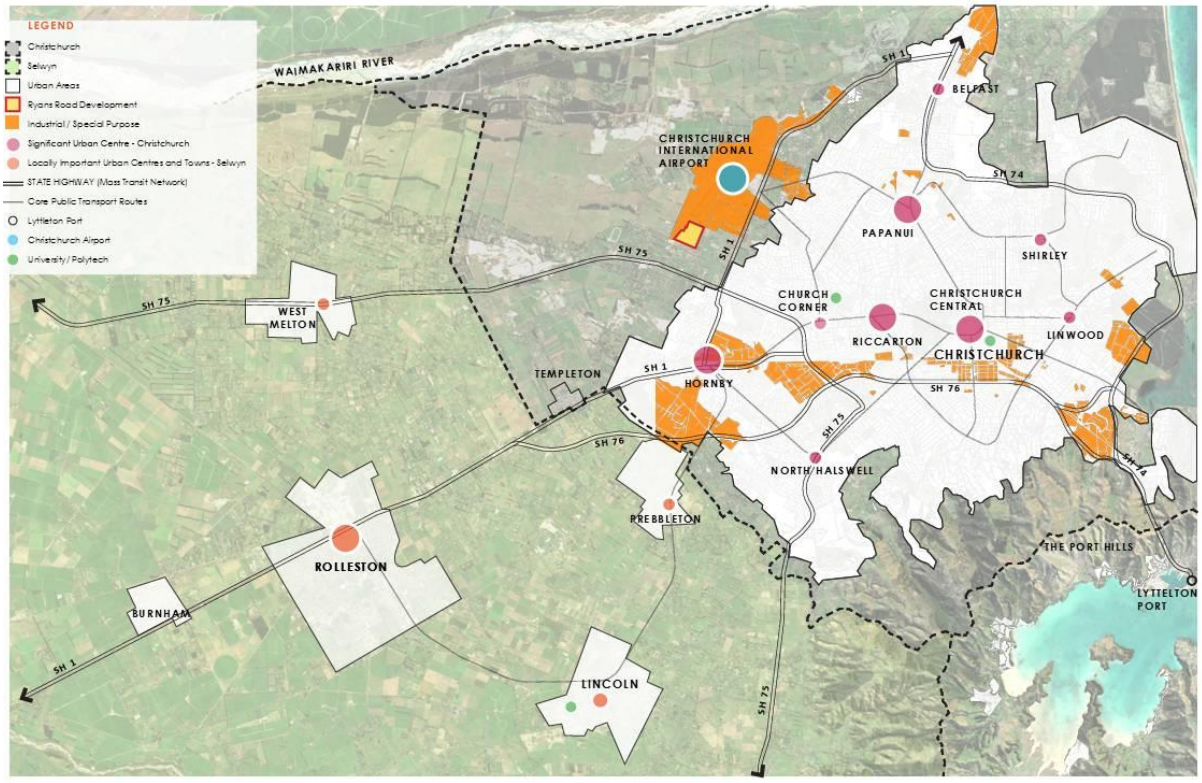

Figure 1: Christchurch Context Plan (Source: DCM)

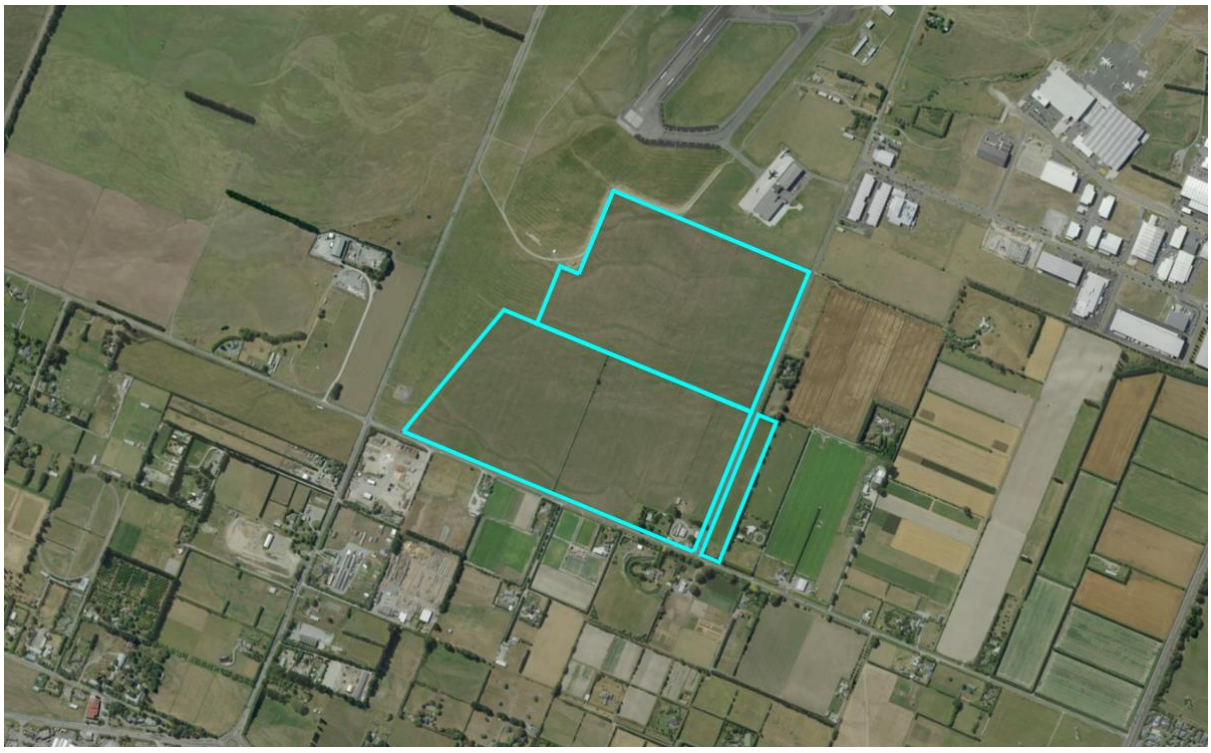

Figure 2: Aerial image of locality (Source: Toitū Te Whenua LINZ)

34. A single pole-mounted powerline runs through the western portion of the site to a bore, and high voltage powerlines extend along the site frontage on Ryans Road[2].

35. A water race flowing east to west is also located on the site's Ryans Road frontage. This is a lateral channel of the Paparua Water Race Network (**PWRN**) and is owned and operated by Selwyn District Council (**SDC**). It sources water from the Waimakariri River near Intake Road and supplies irrigation and stock drinking water to the surrounding area. The PWRN channels are considered artificial waterways. There are no other ecological, wetland/waterway, cultural or heritage items/areas associated with the site identified in the Christchurch District Plan (**CDP** or **District Plan**) or identified by the project's ecologists.

36. The site contains an existing bore for irrigation purposes and Water Take Permit CRC144308 permits:

- Taking water from bore M35/3176 at rate of 21 L/s.
- Taking a volume not exceeding 9,504 m^3 in any period of seven consecutive days, and 142,163 m^3 between 1 July and the following 30 June.
- Use of the water for irrigation of crops and pasture for grazing stock, excluding milking dairy cows.

37. A portion of the site to the west falls under a Designation for Airport purposes and a Runway End Protection Area (**REPA**) overlay in the District Plan. The REPA overlay prevents buildings, structures, and certain activities from establishing in this location by way of a rule with prohibited activity status. The designation requires approval under section 176A of the RMA from the Airport as the Requiring Authority for any use of land. The Christchurch International Airport Protection Surfaces in Appendix 6.11.7.1 and Appendix 6.11.7.2 of the District Plan also sit over the site and specify take off and approach slopes that restrict building height and lighting on some of the lots on the western side of the development. These restrictions are shown on the Capture Land Development Scheme Plans in **Appendix 3**.

38. The site is subject to several significant noise sources and experiences higher noise levels which distinguish it from typical or more remote rural environments. Existing noise levels at the site already exceed the District Plan noise rules, particularly during more sensitive nighttime hours. This is described in further detail in the acoustic assessment in **Appendix 4**, however in summary, the key factors contributing to the noise levels at the site include:

- Aircraft approaching and departing the Airport, and readying and taxiing before flight.
- Engine testing within the Airport.
- Industrial activities to the north of the site, either directly related to the Airport airfield operations or within Christchurch International Airport Limited (**CIAL**) owned industrial land.

[2] The District Plan planning maps identify these powerlines as 33kV lines, however based on correspondence with Orion they are understood to be 11kV lines. This is not material to the assessment of the application, which conservatively treats them as 33kV.

- Russley Road / State Highway 1 and Yaldhurst Road / State Highway 73, and traffic on busy rural roads nearby.
- Industrial/ commercial activities on the sites at 614 Pound Road (TW Transport yard) and at 22 Ryans Road (a wood incineration activity).
- Ruapuna Speedway, to the south-west.
- Quarries to the north on Pound Road.

The Site Ground and Groundwater Characteristics

39. The Canterbury Maps GIS system shows that the site is over the unconfined/semi-confined Groundwater Aquifer system. The groundwater is deep with well M35/3176 within the site showing the highest groundwater level at 14.5 m below ground level (**mbgl**).

40. The site stratigraphy has been derived from the geotechnical investigations as carried out by Tetra Tech Coffey, provided in detail in the geotechnical report attached as **Appendix 5.** In summary, the site has relatively uniform layers. Silty lenses were observed within the sand layer and it is expected that silt content is variable throughout this layer across the site.

41. A borehole located immediately adjacent the northeast corner of the site indicates gravels extend to at least 15.6 metres below ground level. Groundwater was not encountered in any of the site-specific test pits, and there are no monitored wells on site.

42. Given the depth to groundwater the site does not contain spring upwellings or other natural surface water features. No visible stream channels, saturated ground or hydrophytic vegetation has been observed on site.

43. A Detailed Site Investigation (**DSI**) for contamination has been undertaken on the site by Tetra Tech Coffey and is attached as **Appendix 6**. The contamination found on site is largely limited to an area in the immediate vicinity of the existing buildings in the south-east corner of the industrial block and is considered overall minor and consistent with a rural site of this nature.

The Site Ecology

44. The site's ecological environment has been determined through ecological investigations carried out by Pattle Delamore Partners Ltd (**PDP**) and is reported in detail in the ecology reports attached as **Appendix 7** (lizards), **Appendix 8** (waterways) and **Appendix 9** (avifauna).

45. In summary, the site is located within the Low Plains Ecological District of the Canterbury Plains Ecological Region and is situated on the rural urban fringe of the city. The site is abundant with vegetation consisting of rank grass, shrubs and larger trees, with multiple old, abandoned buildings.

46. The abandoned buildings on the site serve as important avian habitat, with active starling nests and large populations of rock pigeons roosting in these structures. The site also supports a variety of bird species, including Eurasian skylarks and spur-winged plovers, which use the rank grass and hedgerows for nesting and foraging. In total, 14 bird species were recorded during a site visit, though no evidence was found of native species breeding or nesting on site during the observation period.

47. The vegetation on site is predominantly composed of exotic plant species, providing food sources for both insects and birds. In particular, mature trees and scattered poplar species offer roosting, nesting and foraging opportunities for local avifauna. Additionally, the site has *potential* habitats for native lizard species, such as southern grass skinks, particularly in areas with rank grass, rock piles, and abandoned buildings. However, no lizards were observed during the site visit.

48. The artificial water race that flows adjacent to Ryans Road may contain some limited aquatic values but is not considered a natural hydrological feature of the landscape.

The Surrounding Environment

49. Properties opposite the site on Ryans Road are of a rural-residential nature (211 Ryans Road to 83 Ryans Road). The wider area also contains a number of rural-residential homes located along the local roads and further within the landscape accessed via long driveways. Land use is predominantly agricultural with stock grazing and crop fields present.

50. A number of sites in the immediate vicinity are used for industrial purposes despite their rural zoning, some consented and some not. Along Ryans and Pound roads, several industrial yards and businesses are intermixed with the agricultural fields, including a firewood supplier (588 Pound Road), building removal company (600 Pound Road), transportation companies (213 and 250 Ryans Road), distribution business (633 Pound Road), horse and pet supplier (57 Ryans Road) and agricultural research facilities (60 Ryans Road).

51. Of note are the following industrial consents:

- The site at 614 Pound Road has consent (issued on 10 May 2017) to establish and operate a business which involves outdoor storage and screening of material, truck parking, and an office (Council reference: RMA/2016/3080).

- The site at 252 Ryans Road has consent (issued on 5 August 2016) to establish a wood incinerating business on a rural site that included the erection of a number of buildings including a 450m^2 receiving shed (Council reference: RMA/2015/3030).

52. To the immediate north of the site is Christchurch International Airport, and to the immediate west is land designated for airport purposes, which covers the northwestern boundary of the site. The end of the emergency stop for the runway associated with Christchurch International Airport is located 74m from the site at its closest point. The end of the physical runway is located 170m from the north-western corner of the site (closest point). Immediately northeast is Garden City Helicopters and an online distribution centre within airport land. These industrial uses extend out further to the northeast to form part of the well-established industrial and commercial area servicing the airport.

53. As noted above, along the southern boundary of the site is the lateral channel of the PWRN. Over time the water race channels have generally either been decommissioned or piped within the Canterbury area as the land-use changes from rural urban fringe to industrial or residential. The water race crosses Ryans Road from the south side to the north side at the western extent of the site and then runs along the northern side of Ryans Road out to Russley Road/SH1. The race is piped under Grays Road via a 375mm diameter concrete culvert and piped under Russley Road/SH1 to Avonhead Park via 375mm diameter reticulation main.

54. Electricity distribution lines belonging to Orion run along Ryans and Grays Roads.

55. Overall, the character of the surrounding area is very mixed, and not typical of more remote rural areas. The area is a transitional space between the industrial and urban rural fringe zones along Ryans, Grays and Pound Roads and is strongly influenced by the presence of the airport. The features described above are shown in **Figure 3**.

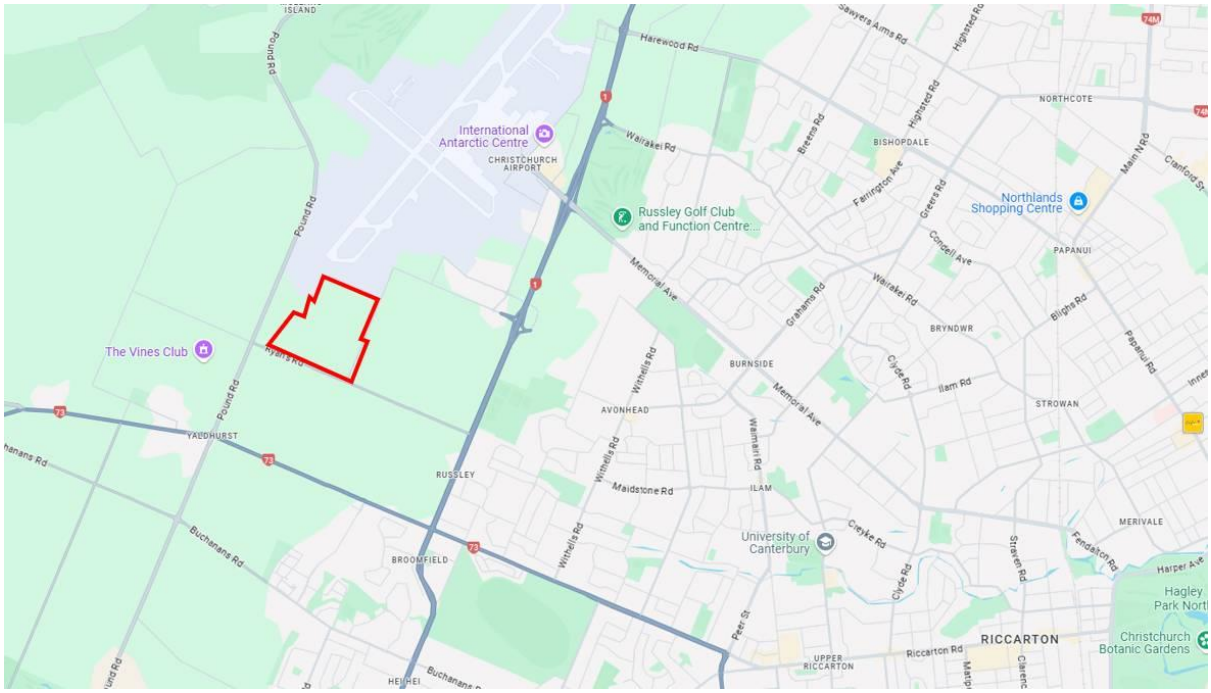

Figure 3: Site location (red) and surrounding environment (Source: Google Maps)

The Surrounding Transport Environment

56. The transport environment in the vicinity of the site has been described in the transport assessment carried out by Nick Fuller, Principal Transport Engineer (Novo Group Limited), attached as **Appendix 10.** A summary is provided below.

57. Ryans Road at the site frontage has two traffic lanes in a 7.0m carriageway and an 84m long section of shoulder widening. The posted speed limit between Russley Road and Pound Road is 80km/h, which decreases to 60km/h west of Pound Road.

58. Grays Road at the site frontage consists of two traffic lanes in a 6.2m carriageway. The posted speed limit is 80km/h, reducing to 50km/h approximately 280m south of George Bellow Road.

59. Pound Road from Ryans Road to State Highway 73 (**SH73**) consists of two traffic lanes in a 7.0m carriageway, with varying shoulder widths. Pound Road north of Ryans Road consists of two traffic lanes in a 7.0m carriageway, with varying widths. The posted speed limit between Yaldhurst Road and approximately 300m north of Ryans Road is 60km/h. This increases to 80km/h 300m north of Ryans Road.

60. The key intersections in the vicinity of the site are the Pound Road/Ryans Road intersection, the Ryans Road/Grays Road intersection, and the Ryans Road/State Highway 1 (**SH1**) intersection.

The Pound Road/Ryans Road intersection is a priority-controlled cross-roads, with Pound Road having the priority. No right turn bays are provided on Pound Road and there is limited space to accommodate right turn queuing on this road. The intersection is within a 60km/h speed limit area. The Ryans Road/Grays Road intersection is a priority controlled 'T' intersection. No turning bays are provided and the intersection is within an 80km/h speed limit area. The Ryans Road/SH1 intersection indicates Ryans Road is limited to left in/out movements only. There is a deceleration lane on SH1 northbound to reduce effects of vehicles slowing to turn left into Ryans Road. This intersection is an 80km/h speed limit area.

61. The site is reasonably remote from existing passenger transport routes and major cycle routes. The closest bus service is Route 86 along SH73, which operates between Darfield and the Central City, with one bus in each direction per day. Cycle lanes are provided on the eastern SH73 approach to SH1, although these do not continue further. Limited cycle lanes are also provided on SH1, including past Ryans Road and at the George Bellew/Syd Bradley Road interchange.

The Proposal

62. CGL propose an industrial subdivision of 55.5ha of rural land at 104 Ryans Road, adjacent to the Christchurch International Airport. CGL propose to develop this land into a freehold industrial subdivision of 126 lots and to provide a framework for the development of the lots by future purchasers for industrial activities, buildings and site improvements. CGL have provided the applicant's/ authorised person's statement in **Appendix 1**.

63. It is generally proposed that the operative District Plan's Industrial General Zone (**IG**) rules and relevant District Plan general rules applicable to the IG Zone (e.g. noise, lighting and signage rules), applicable at the date of this application, shall apply to the newly created lots in order to govern future land use activities and development on individual sites. In addition to consent conditions that provide for this, some additional conditions propose bespoke requirements for site development and activities in order to address the context of the site.

64. Anticipated industrial activities include dry industrial uses (with low water/wastewater use requirements), light manufacturing, warehouse and logistics businesses that would have co-location benefits with the CIA. Specifically excluded from the application are noise-sensitive activities (i.e. residential activities), bird-attracting activities (i.e. fish or meat processing), activities involving bulk fuel storage and activities with highly lit exterior spaces on portions of the site. The restrictions that arise from the Christchurch International Airport Limited (**CIAL**) designation, the REPA and protection surfaces are also accounted for.

65. The application also includes associated infrastructure for the development such as roads, three-waters utilities and site landscaping.

66. Scheme plans for the proposal prepared by Capture Land Development Consultants (**Capture**) are attached as **Appendix 3** to this AEE and a proposed subdivision plan is shown in **Figure 4** over the page. Further details of the proposal are set out below under the relevant headings.

Consents Sought

67. The following approvals are sought under s42(4)(a) of the Act (resource consents that would have otherwise been applied for under the RMA) for the proposed activity:

- **Subdivision consent:** For 126 industrial lots and infrastructure/service lots (a non-complying activity).
- **Land use consent:** For future industrial activities, buildings and site improvements (a non-complying activity).
- **Water permit:** For the discharge of construction and operational phase stormwater (roads to stormwater basin and global consent for 126 lots discharging stormwater to ground) (a non-complying activity).
- **Water permit:** To take water for construction purposes (drain damming and diversion) (a discretionary activity).

- **Land-use consent:** To undertake earthworks over an aquifer and within riparian margins (including vegetation clarence) and to install a culvert in the bed of a drain (a restricted discretionary activity).

68. In addition to the resource consents described above, approvals for a Wildlife Act Authority (**WAA**) Permit are sought under s 42(4)(h) of the Act for disturbing native lizard habitat and for the capture and relocation of any native lizards.

Figure 4: Proposed Subdivision Plan (Source: Capture)

Subdivision

Allotments and Staging

69. Two stages (that may occur simultaneously or consecutively) are proposed for subdividing the 126 lots of varying sizes, as set out in the Scheme Plans in **Appendix 3**.

70. The subdivision also includes the creation of lots for roads to enable access and for installing civil infrastructure and for three-waters utilities. Timing for the construction of stages one and two and the proposed sequence of works are outlined in the applicant's statement (see **Appendix 1**).

71. The proposed 126 industrial lots range in size from 1000m^2 - 2563m^2 for the 114 smaller lots located in the centre of the development, and east and south towards Grays Road and Ryans Road. For the 12 larger lots positioned along the north and west boundaries of the site, these range in size between 1.01ha - 4.76ha, noting that some of these lots are partially covered by

the CIA designation and REPA and those specific parts are not able to be built on (without CIAL approval).

72. The industrial block being developed for industrial uses has a total site area of 55.54 ha, noting that this excludes the balance block on the eastern side of Grays Road (being proposed lots 200, 400 & 500).

- **Stage one** has a total area of 19.73ha, of which 17.47ha is for 65 industrial lots and 2.26ha is for roads one, two and three (proposed Lot 300). Stage one also includes proposed lots 200 (stormwater management area), 500 (balance lot not to be developed for industrial use) and 400 (water utility reserve).

- **Stage two** has a total area of 35.81ha, of that 32.36ha is for 56 industrial lots and 3.45ha is for road four (proposed Lot 301) and a stormwater management area (proposed Lot 201).

73. Given the industrial nature of the proposal, no local reserves/green spaces are proposed. All existing buildings will be removed prior to subdivision works commencing.

Roading

74. This involves creating and vesting legal roads for access and installing civil infrastructure for servicing the development as per the plans in **Appendix 3**.

75. Roads to be vested include proposed lots 300 and 301. Access to the development will be from Ryans Road and Grays Road via four proposed internal roads. Roads one and two are accessed from Ryans Road and roads three and four from Grays Road. The new roads will be local (industrial) roads formed in general accordance with Christchurch City Council's (**CCC**) requirements.

76. It is proposed that the existing Ryans Road and Grays Road frontages adjacent to the development will be upgraded from a rural profile to an industrial profile with the inclusion of a kerb and footpath on the development side only. The carriageway and new intersections will be widened to support the proposed development. Footpaths are proposed along one side of all new roads and on the existing roads fronting the development to provide pedestrian connectivity through the development.

Landscaping

77. There is a proposed 3m wide landscape strip at the site's Grays Road and Ryans Road facing frontages and street-tree planting throughout the road reserves (see attached concept landscape plan prepared by DCM Urban in **Appendix 11**).

78. All proposed planting will be either native and selected from the planting list in Appendix 6.11.9 of the District Plan (relating to non-bird attracting species due to the site's location under the CIA protection surfaces and REPA) or as advised by the project's avifauna expert for non-native street tree varieties.

Three Waters

79. The proposed three water servicing is outlined in detail in the following technical reports and is summarised below:

- Three Water Servicing Report prepared by PDP attached as Appendix 12.
- Stormwater Management Technical Report prepared by PDP attached as Appendix 13.
- **Infrastructure Report** prepared by Capture attached as **Appendix 14**.

Water Supply

80. Water supply is proposed to be provided from the CCC Northwest Water Zone via a new water reticulation network and vested to CCC as public infrastructure. A new DN355 PE100 main will be installed along Russley Road and Ryans Road to the development site from the existing 375mm water main outside 50 Russley Road. A booster pump is required at the development (on proposed Lot 400) to achieve the required pressure of 25m across the entire development site. All water supply infrastructure will be designed and constructed in accordance with the requirements of the CCC Infrastructure Design Standards (**IDS**) and Construction Standard Specification (**CSS**).

81. The application does not propose that the Water Take Permits for the existing bore will be transferred to the applicant for industrial use.

Wastewater reticulation

82. Wastewater reticulation is proposed to be serviced by the CCC wastewater network via a new low-pressure sewer (**LPS**) reticulation network, given that the nearest pump station is 1.6km from the site. This will involve the establishment of private pump stations on individual lots that pump to a common pressure sewer pipe network. The LPS network will discharge to the existing CCC wastewater manhole (WWMH ID24959) on Russley Road and will be vested to CCC as public infrastructure.

Stormwater

83. Operational stormwater runoff generated from proposed roads, footpaths and berms will be collected in sumps and conveyed via a reticulated network for treatment and attenuation to one of two first flush infiltration basin/ soak pit systems (stormwater management areas) on Lots 200 and 201 sized to meet the requirements of the CCC Wetlands, Waterways and Drainage Guide and a 2% AEP flow, prior to discharge to ground. The basis of this design approach has been developed to remove potentially significant contaminants (e.g. heavy metals and hydrocarbons) expected to be within the operational-phase stormwater runoff from trafficable areas.

84. The development has been divided into two stormwater catchment areas, northern (Lot 201) and southern (Lot 200) to manage road reserve runoff. Each stormwater management area (**SMA**) will include an infiltration basin and overflow soak pit. Both stormwater reserves will contain a planted stormwater basin, with planting meeting the bird strike management requirements in Appendix 6.11.9 of the District Plan.

85. All stormwater infrastructure shall be designed and constructed in accordance with the CCC IDS and CSS. The reticulation network and stormwater management devices will be vested to CCC who will be responsible for ongoing maintenance and ownership once the defect maintenance period expires.

86. Operational stormwater runoff generated by the 126 lots will be discharged to private onsite stormwater systems to provide treatment and disposal to ground via infiltration devices. Run-off from roofed areas will be collected and be disposed to ground with no treatment (as it is considered clean) by onsite soak pits sized to accommodate the critical design event (3hr 2% AEP).

87. All other stormwater generated on the lots from hardstand areas will be directed to an onsite proprietary treatment device for treatment of the "first flush" flow prior to disposal to ground via soak pits sized to accommodate the critical design event. The use of proprietary treatment has been considered for this development to maximise available hardstand and undertake all stormwater management/disposal below ground (due to CIA).

Utilities

88. The proposed utility services to the site are detailed in the Capture Infrastructure Report attached in **Appendix 14** and are summarised as follows:

- **Power services-** Power services to the site during the construction/civil works phase are proposed via the existing high voltage overhead lines along the northern side of Ryans Road and along the eastern side of Grays Road adjacent to the site. Consultation has been undertaken with Orion (the power supplier and network owner) regarding servicing the development. Orion has confirmed there is approximately 150kVA capacity in the existing overhead network along Ryans Road, which, in addition to construction, can also be used for building construction within Stage 1. Orion, in partnership with Kowhai Park Solar Farm, are in the process of undertaking significant power upgrades along Ryans Road and Grays Road by installing 66kV underground power lines to distribute the power generated by the solar farm back into the existing power grid. Orion has noted the 66kV network can potentially provide capacity for the Ryans Road development (Stage 2).

- **Fibre-** The subject site is within an Enable supply area to supply fibre to the development. Consultation with Enable or potential other fibre providers will be undertaken to determine the network connection points and reticulation layout.

- **Streetlights-** A lighting assessment for the development has been completed by Pedersen Read Consulting Electrical Engineers (see **Appendix 15)**. Street lighting will be required in accordance with CCC District Plan rules for lighting within 500m of the threshold of a runway at CIA and in accordance with Civil Aviation requirements, which prevent light shining above the horizontal.

Waterways

89. As described in the infrastructure report (**Appendix 14**), the existing artificial water race along Ryans Road, which is known to be a lateral of the PWNR, will be piped with a 375mm diameter culvert for its 840m length to facilitate the upgrading of Ryans Road to an industrial standard with kerb and footpath. During construction, the drain water will be dammed and diverted (water taken) via a stabilised diversion channel to enable the pipe to be installed offline (in dry conditions) and discharged back into the same drain to the east of the site. The installation of the culvert will require clearance of the grass, gorse hedging and other non-indigenous vegetation along this boundary. A 'fish management plan' will be in place for the duration of the diversion of the drain and construction of the pipe/culvert. The proposed works are detailed in the Capture Earthworks

Management Plan in **Appendix 16** and the proposed construction phases for the water race work broadly entail:

- Install erosion and sediment devices at downstream end of diversion channel.
- Excavate division channel and stabilise with geotextile cloth.
- Open the downstream end of the diversion channel into the water race outside the extent of works.
- Dam the upstream end of the water race and stabilise with geotextile cloth.
- Dam the downstream end of the water race to isolate the construction area.
- Pump any resultant water within the construction area to a sediment device.
- Install culverts and stabilised embankments.
- Remove the downstream end of the diversion bund.
- Remove the upstream end of the diversion bund to allow water to flow through the culverts.

Earthworks and Construction

90. As noted above, development and associated earthworks are proposed to be undertaken in two stages. Earthworks for subdivision are described in detail in the Capture Infrastructure Report in **Appendix 14**.

91. In summary, they are proposed to be generally confined to the road corridors and construction of infrastructure to limit the area of earthworks and amount of exposed soil at any one time. Earthworks for individual lots are not proposed at this stage as these will fall to future developers of the lots to address their individual requirements.

92. The maximum anticipated earthwork cut depths are: 0.5m within the roading areas, 2.5m for civil drainage works, and approximately 6.0m for infiltration soakage pits. Therefore, groundwater (at a depth of 12-15 metres below ground level) is not expected to be encountered during the earthworks or civil works associated with the development.

93. Erosion and sediment controls are to be installed in accordance with Environment Canterbury (**ECan**), 2023 Erosion and Sediment Control Toolbox for Canterbury prior to the commencement of any earthworks on the site and maintained for the full duration of the works. The controls to be installed are detailed in the Capture Earthworks Management Plan (see **Appendix 16**) and include: stabilised site entrances, clean water diversion bunds/channels, dirty water diversion bunds, super silt fences and sediment retention areas and soakage devices.

94. A DSI for contamination has been undertaken on the site by Tetra Tech Coffey and is attached as **Appendix 6**. The contamination found on site is largely limited to an area in the immediate vicinity of the existing buildings in the south-east corner of the site, and is considered minor and consistent with a rural site of this nature. The contamination in the south-east corner of the site will be remediated in accordance with industry standards per a Remediation Action Plan that will be implemented prior to earthworks on the wider site commencing.

95. Regarding the site's location in proximity to the CIA and rural/ residential neighbours, a Construction Management Plan (see **Appendix 17**) is also proposed to manage construction phase birdstrike risk, dust, noise, vibration and lighting.

Land Use - Industrial Activities

96. The site is currently zoned Rural Urban Fringe (**RUF**) under the operative Christchurch District Plan. As such, the zoning of the site does not anticipate the urban industrial development and activities that this application seeks to provide for. Therefore, the application proposes that the RUF provisions of the District Plan do not apply to future land use within a majority of the proposed 126 lots (see exceptions below) and instead proposes a framework for future industrial development of the lots by way of consent conditions that are broadly based on the IG Zone rules.

97. This approach (to essentially rezone the site via consent) will facilitate subsequent development, including the construction of industrial buildings and activities without the need for (or reducing the need for) further resource consents under the current RUF District Plan provisions.

98. It is expected that future industrial uses of the site are likely to have an association with CIA, including for example, logistics, warehousing, and light-manufacturing businesses. The application limits industrial activities to 'dry uses' and will prevent by design of the water infrastructure manufacturing and activities with large water and trade waste requirements. For reasons detailed in the following assessment of effects, the activities that are specifically excluded/not provided for within the application are as follows (and as defined in the District Plan):

- Residential activities / residential units including for management / security purposes (aircraft noise-sensitive),
- Education activities (aircraft noise-sensitive),
- Service stations (hazard risk),
- Yard based landscape/ garden suppliers (birdstrike risk), and
- Heavy industrial activities including fish processing or packing plants and abattoirs or freezing works (birdstrike risk).

99. The framework for future development of the site for IG activities is not proposed to apply to lot 500 where the RUF built form rules will continue to apply. This will be recorded in consent notices on these titles.

Framework for Future Development

Conditions for Activities & Built Form:

100. The framework (conditions) described below will apply to the future development of lots 1 – 57 and 61-126. The proposal is to replace the RUF activity status and built form standards with the IG activity standards and built form standards (noting the excluded activities above). For ease of future reference and in the event of changes to the District Plan rules, it is proposed to attach the

relevant District Plan sections/rules as at the date of the decision to the decision document as an appendix.

101. The draft zone conditions are as follows:

> ***Activity Standards***
>
> *a. Excepted as modified below in b., the future development of lots 1 –126 for industrial uses must comply with the District Plan Activity Standards for the Industrial General Zone at rule 16.4.1.1 Permitted activities attached as [**Appendix XX**] to this decision.*
>
> *b. Specifically excluded/ not provided for activities on these lots are the following (as defined in the District Plan):*
>
> - *Residential Activities / Residential Units (including for management / security purposes),*
> - *Education Activities,*
> - *Service Stations,*
> - *Yard based landscape/ garden suppliers, and*
> - *Heavy Industrial Activities (Fish Processing or Packing Plants and Abattoirs or Freezing Works).*
>
> ***Built Form Standards***
>
> *a. Except as modified below in b., the future development of lots 1 – 57 and 61 - 126 must comply with the Built Form Standards in Rule 16.4.2 - Industrial General Zone attached as [**Appendix XX**] to this decision; except that:*
>
> *b. The minimum building setback from Grays Road and Ryans Road shall be 3m.*

General Conditions:

102. In addition to the conditions above specifying the activities and built form authorised under the consent, the application proposes that the other general chapters of the District Plan will also apply to the future development of sites as if they were zoned Industrial General, except where the site context warrants bespoke conditions to address adverse effects. These provisions can be brought to the attention of future purchasers via consent notices where relevant.

103. The following general conditions are proposed:

> ***Noise***
>
> *a. Future development of lots 1 – 126 for industrial purposes must comply with the District Plan noise rules in 6.1.4 General Noise Rules and 6.1.5 Zone Specific Noise Rules attached as [**Appendix XX**] to this decision.*
>
> *b. The noise standards for the Industrial General Zone apply to lots 1 – 126.*
>
> ***Glare***
>
> *a. Future development and construction activities on Lots 7 – 126 for industrial purposes must comply with the District Plan Glare rules in 6.3.4 Control of Glare attached as [**Appendix XX**] to this decision.*
>
> *b. For the future development of Lots 7 - 126 for industrial purposes a site-specific lighting plan and assessment prepared by a suitably qualified lighting engineer will be required at time of building consent to demonstrate compliance with NC1 and NC2 as follows:*

(i) Within 500m of the threshold of a runway at Christchurch International Airport, those being lots or specific portions of lots 92, 109, 110, 111, 112, 113, 114, 115, 121, 122, 123 and 124 (as shown on the Capture Land Development Plans) any activity will not result in greater that 2.5 lux spill (horizontal or vertical) on to any land outside of the Specific Purpose Airport Zone.

(ii) for lots 7 - 126 assessment against NC2 to ensure non-aeronautical ground lights do not shine above the horizontal.

Control of Light Spill

*a. Future development and construction activities on lots 1 – 126 for industrial purposes must comply with the District Plan Light Spill rules in 6.3.5 Control of Light Spill and 6.3.6 Light Spill Standards by Zone for Industrial zones (permitted lux spill horizontal or vertical 20 Lux) attached as [**Appendix XX]** to this decision.*

Aircraft Protection

a. Future development and construction on lots 1 – 126 for industrial purposes must comply with the District Plan Aircraft Protection rules in 6.7.4 including:

- 6.7.4.1 Protection Surfaces,

- 6.7.4.2 Runway End Protection Surfaces,

- 6.7.4.3 Birdstrike Management Areas, and

- 6.7.4.4 Protection Surfaces for Christchurch International Airport

*attached as [**Appendix XX**] to this decision.*

Signs

*a. Any signs part of the future industrial development of lots 1 – 126 must comply with the District Plan Sign Rules in 6.8.4 attached as [**Appendix XX**] to this decision, as if the site were zoned Industrial General (not Rural).*

b. Except there shall be no LED/ Digital Signs or Billboards permitted by this consent.

Earthworks

*Any earthworks for the future development of lots 1 – 126 with buildings and for the Industrial General zone in Table 9 Maximum Volumes - earthworks of Rule 8.9.2.1 of the District Plan attached as [**Appendix XX**] to this decision, as if the site were zoned Industrial General (not Rural).*

Transport

*Future development of lots 1 – 126 for industrial purposes must comply with the District Plan Activity Status Tables – Transport in rule 7.4.2 attached as [**Appendix XX**] to this decision.*

Proposed / Draft Conditions

104. In addition to the above framework, the application includes a broader package of proposed draft consent conditions (see **Appendix 18**) which have been identified in the experts' effects assessment (e.g. a wildlife hazard management plan for bird-strike) or that form part of CCC's or the Canterbury Regional Council's (**CRC** or **ECan**) standard subdivision, earthworks and discharge conditions. These conditions take into account the feedback received from CCC and ECan, including their suggested alternatives for conditions (which have not been adopted for the reasons expressed in the experts' effects assessments).

Wildlife Act 1953 & Lizard Habitat

105. PDP has carried out an assessment and survey work to determine the site contains an indigenous lizard population (see **Appendix 7** and **38**).

106. All native reptiles are legally protected under the Wildlife Act 1953, and the protection of habitats used by populations of native lizards (particularly threatened species) is considered a matter of national importance under the RMA. The applicant seeks a wildlife approval (under s 42(4)(h) of the Act) to handle and relocate lizard specimens.

107. PDP has prepared a Lizard Management Plan (**LMP**) (see **Appendix 7**), which details the methods involved with native lizard salvage and relocation should species be discovered at the site prior to or during development works.

Statutory Context

Fast-track Approvals Act 2024

108. This application is made under the FTAA2024. Other legislation relevant to the application, as referred to in the Act, include the Resource Management Act 1991 (**RMA**) and the Wildlife Act 1953 (**Wildlife Act**).

109. The purpose of the FTAA2024 is set out in section 3 as follows:

> The purpose of this Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Section 85 Considerations

110. As per the panel's decision-making considerations under the Act, because the proposal does not involve activities which would require refusal as referenced in s 85(1) and (2) of the Act, this application could only be declined under s 85(3)(b) if it would result in 'sufficiently significant adverse impacts' that are out of proportion to the project's regional or national benefits', even after taking into account:

- Any conditions that the panel may set in relation to those adverse impacts; and
- Any conditions or modifications that the applicant may agree to or propose to avoid, remedy or mitigate, offset, or compensate for those adverse impacts.

111. As per s 85(5) of the Act, an adverse impact means any matter considered by the panel (as per s 81(2)) that weighs against granting the approval. To avoid doubt s 85(4) states that a panel may not form the view that an adverse impact meets the threshold in subsection (3)(b) solely on the basis that the adverse impact is inconsistent with or contrary to a provision of a specified Act or any other document that the panel must take into account or otherwise considered.

112. Relevant to adverse environmental effects, only the sufficiently significant adverse effects of the proposal – whether individual or cumulative – have the potential to weigh against granting of the approvals. Therefore, any significantly adverse environmental effects of the proposal that cannot be appropriately avoided, remedied, mitigated, offset or compensated would need to be balanced against the national or regional benefits of the project.

113. The following sections of this assessment evaluate all relevant effects and planning documents/provisions, prior to reaching a conclusion in regards s85.

Other Statutory Documents

Wildlife Act 1953

114. Approvals are sought under s 42(4)(h) (wildlife approvals as defined in clause 1 of Schedule 7) of the FTAA2024. Wildlife approval means a lawful authority for an act or omission that would otherwise be an offence under any of the sections 58(1), 63(1), 63A, 64, 65(1)(f), 70G(1), 70P, and 70T(2) of the Wildlife Act.

115. It is an offence under s 65(1)(f) and 70P the Wildlife Act to interfere with protected animals, including indigenous lizards which may occupy areas of the site without the required licence, permit, concession, or other right or authority. As described above in the description of the proposal, approval is sought for developing land where indigenous lizards are present in accordance with the LMP included in **Appendix 7**.

Resource Management Act 1991

116. This application is for approvals sought under s 42(4)(a) (resource consents that would have otherwise been applied for under the RMA). The various resource consents (as described earlier in this report) and the corresponding assessment of effects on the environment (AEE) is prepared in accordance with the information requirements of the FTAA, specifically clauses 5 - 8 of the Schedule 5. Where logical, this has included an assessment of effects in accordance with the requirements of the RMA.

117. The statutory context described in the following sections of this report is focused on the relevant RMA context, which in summary includes:

- The National Policy Statement for Freshwater Management 2020 (**NPS-FM**);
- The National Policy Statement for Indigenous Biodiversity 2023 (**NPS-IB**);
- The National Policy Statement for Highly Productive Land 2022 (**NPS-HPL**);
- The National Policy Statement on Urban Development 2020 (**NPS-UD**);
- The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (**NES Soil**);
- The Canterbury Land and Water Regional Plan (**LWRP**);
- The Canterbury Air Regional Plan (**Air Plan**); and,
- The Operative Christchurch District Plan.

National Environmental Standards

NES for Contaminants in Soil

118. The NES Soil controls soil disturbance on land where an activity on the Hazardous Activities and Industries List (**HAIL**) is being carried out, has been carried out, or is more likely than not to have been carried out.

119. The ECan Listed Land Use Register (**LLUR**) is used to hold information about sites that have used, stored or disposed of hazardous substances, based on activities detailed on the HAIL (MfE, 2011). It should be noted that the LLUR is not complete. New sites are regularly being added as ECan receives information and conduct their own investigations into current and historical land uses. The LLUR does not currently record the application site as having contained a past or present HAIL activity. Instead, the application site has been identified as HAIL land via a DSI in **Appendix 6** and therefore the following provisions of the NES Soil apply.

> **Regulation 8:**
>
> (4) Subdividing land or changing the use of the piece of land is a permitted activity while the following requirements are met:
>
> (a) a preliminary site investigation of the land or piece of land must exist:
>
> (b) the report on the preliminary site investigation must state that it is highly unlikely that there will be a risk to human health if the activity is done to the piece of land:
>
> (c) the report must be accompanied by a relevant site plan to which the report is referenced:
>
> (d) the consent authority must have the report and the plan.
>
> **Regulation 9:**
>
> (3) If a requirement described in regulation 8(4) is not met, the activity is a controlled activity while the following requirements are met:
>
> (a) a detailed site investigation of the piece of land must exist:
>
> (b) the report on the detailed site investigation must state that the soil contamination does not exceed the applicable standard in regulation 7:
>
> (c) the consent authority must have the report:
>
> (d) conditions arising from the application of subclause (4), if there are any, must be complied with.
>
> (4) The matter over which control is reserved is the adequacy of the detailed site investigation, including—
>
> (a) site sampling:
>
> (b) laboratory analysis:
>
> (c) risk assessment.
>
> **Regulation 10:**
>
> (1) This regulation applies to an activity described in any of regulation 5(2) to (6) on a piece of land described in regulation 5(7) or (8) that is not a permitted activity or a controlled activity.
>
> (2) The activity is a restricted discretionary activity while the following requirements are met:
>
> (a) a detailed site investigation of the piece of land must exist:

(b) the report on the detailed site investigation must state that the soil contamination exceeds the applicable standard in regulation 7:

(c) the consent authority must have the report:

(d) conditions arising from the application of subclause (3), if there are any, must be complied with.

120. The volume of the disturbance of the soil on the piece of land does not meet Regulation 8(3)(c), as the volume of soil disturbance will exceed 25m³ per 500m² on the piece of land. This triggers the requirement for consent under Regulation 9(1).

121. The DSI also shows that soil contamination exceeds the applicable standard in Regulation 7 in defined locations on site.

122. Pursuant to Regulation 10 of the NES Soil, the proposal is a restricted discretionary activity.

NES Soil Consent Status

123. Overall, the proposal must be considered as a **restricted discretionary activity** under the NES Soil.

Regional Plans

Canterbury Land and Water Regional Plan

124. In terms of the LWRP, the information below is relevant to the application site.

- The site is located in the area covered by the Christchurch-West Melton sub-regional chapter (Chapter 9 of the LWRP).
- Catchment Name: Selwyn/Waimakariri Plains.
- Aquifer System: Semi-confined or unconfined aquifers.
- Christchurch Ground Water Protection Zone.
- Christchurch West Melton Subregion / Water Allocation zone.
- The PWRN is not defined as a 'river'[3] as it is an artificial water course. The rules in 5.135 – 5.141B (Structures), 5.154 – 5.158 (Dams and Damming), 5.163 – 5.166 (Vegetation in Lakes and Riverbeds) and 5.167 – 5.169 (Earthworks and Vegetation Clarence in Riparian Areas) do not apply to the application.

125. A full compliance assessment of the proposal against the LWRP including identification of permitted activities is contained in **Appendix 19**.

[3] **River in the LWRP:** means a continually or intermittently flowing body of fresh water; and includes a stream and modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity power generation, and farm drainage canal)

126. The table below includes a summary of the rules in the LWRP which the proposal requires consent under and the corresponding activity status:

5.93A - 5.97 Region-wide Rules: Stormwater

Construction-phase stormwater not discharged from a Reticulated Stormwater System		
5.94B The discharge of construction-phase stormwater, other than into or from a reticulated stormwater system, into a surface waterbody, or onto or into land in circumstances where a contaminant may enter groundwater or surface water, that does not meet one or more of the conditions of Rule 5.94A.	**RD**	The construction phase stormwater discharge to land will occur on a contaminated site and the area of land disturbed from which the discharge will generate exceeds 2ha. The water taken to divert PWRN along Ryans Road while a pipe is installed will be discharged back into the water race downstream.
Stormwater not discharged from a Reticulated Stormwater System		
5.97 The discharge of stormwater, other than from a reticulated stormwater system, into a river, lake, wetland or artificial watercourse or onto or into land in circumstances where a contaminant may enter water that does not meet one or more of the conditions of Rule 5.95 or Rule 5.96; and the discharge of stormwater or construction-phase stormwater into a reticulated stormwater system that does not meet the condition of Rule 5.93A. Within the boundaries of Christchurch City.	**NC**	The DSI by Tetra Tech Coffey has identified the site as contaminated. Industrial uses proposed. Global consent is sought for 126 lots to discharge to land via individual treatment/ infiltration systems.

5.116 - 5.118 Region-wide Rules: Water for Construction and Maintenance

5.118 The taking and using of water from a river, lake or an artificial watercourse for infrastructure construction, maintenance and repair, other than from any river or part of a river that is subject to a Water Conservation Order, that does not meet one or more of the conditions in Rule 5.116.	**D**	The take of water for diverting the PWRN along Ryans Road owned and operated by Selwyn District Council (SDC) will not meet a number of the conditions in 5.116.

5.175 - 5.178 Region-wide Rules: Earthworks over Aquifers

5.176 The use of land to excavate material that does not comply with one or more of the conditions of Rule 5.175.	**RD**	Excavation over the unconfined or semi-confined aquifer does not comply with standards in 5.1.5.7 as excavation exceeds 100m^3 and excavation is within 50m of the PWRN.

Canterbury Air Regional Plan

127. The relevant rules in the Air Plan are Rules 7.32 to 7.36 which relate to dust generating activities. As an Earthworks Management Plan (refer to **Appendix 16**) is provided as part of the application, and this includes an Earthworks and Sediment Control Plan (**ESCP**) and dust management measures, the activity is a **permitted activity** under the Air Plan.

Operative District Plan

The Operative Christchurch District Plan

128. The site is zoned Rural Urban Fringe in the District Plan and is subject to the following notations and overlays:

- Designation: Christchurch International Airport
- Runway End Protection Area (REPA)
- 55 dB Ldn Air Noise Contour
- 50 dB Ldn On-Aircraft Engine Testing Noise Contour
- Christchurch International Airport Protection Surface
- 33KV Powerlines (Ryans Road Frontage)
- Network Utility Waterway
- Local Road - Ryans and Grays Roads

129. An assessment of the proposal's compliance with the applicable rules in the District Plan is set out in **Appendix 19**. Based on that assessment, resource consent is required in respect of the matters listed below, with the corresponding activity status noted:

6.2 General Rules and Procedures: Noise

6.1.5 Zone Specific Noise Rules		
6.1.5.1.5 Non-complying activities		
NC1. Any activity listed in Rule 6.1.5.1.1 P1 or P3 that exceeds the noise limits in the activity specific standards by more than 10 dB.	**NC**	Within the site (i.e. between the proposed industrial lots) noise levels could exceed the Rural Urban Fringe noise standards by more than 10dB.

6.3 General Rules and Procedures: Outdoor lighting

6.3.5 Rules -- Activity status tables -- Control of Light Spill		
6.3.5.3 Restricted discretionary activities		
RD1 Any activity listed in Rule 6.3.5.1 P1 that does not meet the activity specific standard.	**RD**	See Pedersen Read lighting assessment in **Appendix 15**. It is proposed that the Industrial General zone light spill lux levels (20 lux) apply to the site, as such the Rural Urban Fringe zone light spill levels (10 lux) will be exceeded within the site (i.e. between the proposed industrial lots). Light spill will comply at the Rural Urban Fringe zoned properties across Grays and Ryans Road.

6.6 General Rules and Procedures: Water Body Setbacks

6.6.5 Rules - Activity status tables - Rural Water Body Setbacks		
6.6.5.3 Restricted discretionary activities		
RD1 Earthworks: a. not exempt by Rule 6.6.3 h. and not provided for by Rule 6.6.5.1 P1; and/or b. listed in Rule 6.6.5.1 P1 that do not meet one or more of the activity specific standards; other than earthworks provided for by Rule 6.6.5.4 D1 or Rule 6.6.5.6 PR1.	**RD**	The drain along Ryans Road, a lateral channel of the PWRN, is proposed to be piped. Earthworks are proposed within 5m of a network utility waterway for the piping to occur.

6.7 General Rules and Procedures: Aircraft Protection

6.7.4 Rules - Christchurch International Airport		
6.7.4.3 Activity status tables - Birdstrike Management Areas		
6.7.4.3.3 Restricted discretionary activities		
RD2 Any activity listed in Rule 6.7.4.3.1 P3 that does not meet one or more of the activity specific standards.	**RD**	Both of the stormwater basins proposed would exceed 1000 m^2 and are currently within 0.5km of each other. See PDP Stormwater Management Report **Appendix 13**.

6.8 General Rules and Procedures: Signs

6.8.4 Rules		
6.8.4.1.3 Restricted discretionary activities		
RD1 a. Any sign listed in Rule 6.8.4.1.1 P1 - P15 and P18 (other than P7, P8, P9 or P15), that does not meet one or more of the activity specific standards, other than: i. signs provided for in Rule 6.8.4.1.2 C1, Rule 6.8.4.1.3 RD2 - RD4; or ii. discretionary or non–complying activities in Rule 6.8.4.1.4 and Rule 6.8.4.1.5. b. In the Specific Purpose (Ōtākaro Avon River Corridor) Zone, any sign listed in Rule 6.8.4.1.1 P7 that does not meet one or more of the activity specific standards other than signs provided for in Rule 6.8.4.1.2 C1 and Rule 6.8.4.1.4 D1.	**RD**	The maximum area and height of signs attached to buildings and free-standing signs permitted in Rural zones will be exceeded and not meet P1, as it is proposed that the Industrial zone sign areas and heights in rule 6.8.4.2.6 apply to the future development of the site for Industrial Purposes.

7 Transport

7.4.2.3 Restricted discretionary activities		
RD1 a. Any activity that does not meet any one or more of the standards in Rule 7.4.3 unless where otherwise provided for by Rule 7.4.2.5 NC3; or any activity that requires resource consent in accordance with Rule 7.4.3.10 - High trip generators except where otherwise provided for by Rule 7.4.2.2 C1.	**RD**	Vehicle Crossings 7.4.3.8: The sight distance requirements for a 50km/h road may not be achieved for sites on the inside of the bend in Road 4.

8 Subdivision, Development and Earthworks

8.5.1.3 Restricted discretionary activities - Subdivision		
RD2 a. Subdivision in any zone that does not meet any one or more of the relevant standards in: i. Rule 8.5.1.2 C5, C6 or C8; or ii. Rule 8.5.1.3 RD7; except as otherwise specified in: i. Rule 8.5.1.4 D1 to D5; and ii. Rule 8.5.1.5 NC1 to NC8. b. For subdivision in the Residential New Neighbourhood Zone that does not meet Rule 8.6.11.a outline development plan or Rule 8.6.11.b Residential net density, Rule 8.4.1.1.a.i. does not apply.	**RD**	8.6.4 Roads: The proposed formed width of Ryans Road and Grays Road is 10.5m rather than the 11m required by the District Plan. A footpath is only proposed on one side of the roads, rather than both sides required by the District Plan.

8.5.1.4 Discretionary activities - Subdivision		
D1 Subdivision in a rural zone resulting in allotments that does not meet the minimum net site area standards in Rule 8.6.1, unless specified otherwise.	**D**	Lots smaller than 4ha are proposed.

8.9.2.3 Restricted discretionary activities - Earthworks		
RD1 Any activity listed in Rule 8.9.2.1 P1 or Rule 8.9.2.2 C1 that does not meet any one or more of the activity standards.	**RD**	The maximum volume and depth of earthworks for Rural zones will be exceeded for construction of the subdivision and when the site is developed for industrial buildings and activities.

8.9.2.5 Non-complying activities - Earthworks		
NC1 Any activity that does not meet any one or more of the activity standards in Rule 8.9.2.1 P3, P4 or P5.	**NC**	The earthworks in the vicinity of the 33KV power lines do not meet P5. Earthworks are proposed to a maximum depth of 1m.

17.5 Rural: Rules - Urban Fringe Zone

17.5.1 Activity status tables - Rural Urban Fringe Zone		
17.5.1.5 Non-complying activities		
NC1 Any activity not provided for as a permitted, controlled, restricted discretionary, discretionary or prohibited activity.	**NC**	Industrial activities are not provided for in the Rural Urban Fringe Zone and are therefore non-complying. As industrial activities are not provided for in the zone the Rural Urban Fringe built form standards will be breached when future development of the site for industrial activities occurs. The proposal is to replace these with the General Industrial built form standards.

Activity Status

130. Overall, resource consent is required for the proposal as a restricted discretionary activity under the NES Soil and as a non-complying activity under the District Plan and CLWRP. The activity is a permitted activity under the Air Plan. Overall, resource consent is required as a **non-complying activity**.

131. On this we note that although provisions of Parts 2, 3, 6 and 8 to 10 of the RMA that direct decision making on an application for resource consent are required to be considered by the panel, consideration of section 104D of the RMA, which provides for particular restrictions for non-complying activities (i.e. the gateway test) is expressly excluded from consideration under clause 17(1)(b) of Schedule 5 of the Act.

Assessment of Actual and Potential Effects on the Environment

FTAA2024 Effects Framework

132. Clause 5(4) in Schedule 5 of the Act specifies that:

> (4) A consent application must include an assessment of the activity's effects on the environment that—
>
> (a) includes the information required by clause 6; and
>
> (b) covers the matters specified in clause 7.

133. Clause 6 specifies information requirements for an application and AEE, as follows:

> **6. Information required to assess environmental effects**
>
> (1) The assessment of an activity's effects on the environment under clause 5(4) must include the following information:
>
> (a) an assessment of the actual or potential effects on the environment:
>
> (b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use:
>
> (c) if the activity includes the discharge of any contaminant, a description of—
>
> (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and
>
> (ii) any possible alternative methods of discharge, including discharge into any other receiving environment:
>
> (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity:
>
> (e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal:
>
> (f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision:
>
> (g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved:
>
> (h) an assessment of any effects of the activity on the exercise of a protected customary right.
>
> (2) A consent application need not include any additional information specified in a relevant policy statement or plan that would be required in an assessment of environmental effects under clause 6(2) or 7(2) of Schedule 4 of the Resource Management Act 1991.

134. The information listed above in Clause 6 is included in this AEE and in the appended technical reports, to the extent relevant.

135. Clause 7 specifies matters to be covered in an AEE:

7. Matters to be covered in assessment of environmental effects

The assessment of an activity's effects on the environment under clause 5(4) must cover the following matters:

(a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:

(b) any physical effect on the locality, including landscape and visual effects:

(c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:

(d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:

(e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:

(f) any unreasonable emission of noise:

(g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.

Scope of Assessment

136. Taking guidance from the relevant statutory planning documents, including objectives, policies, rules, and the associated matters of discretion or control, a number of specific actual or potential effects of the activity have been identified.

137. These effects are identified and assessed individually, but are grouped in the following section with reference to each of the listed matters in clause 7 for clarity.

Clause 7, Schedule 5 Matters:	Specific Effects Assessed
(a) Any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:	• Economic Effects (including sufficiency of industrial development capacity)
(b) Any physical effect on the locality, including landscape and visual effects:	• Landscape and Visual Amenity Effects • Urban Design Effects • Lighting Effects • Transport Network Effects • Regionally Significant Infrastructure and Reverse Sensitivity Effects • Climate Change and Green House Gas Effects • Highly Productive Soils and Rural Production • Three Waters Infrastructure • Water Quality Effects (Ground and Surface Water)
(c) Any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:	• Ecology and Biodiversity Effects (Herpetology, Freshwater and Avifauna)

(d) Any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:	• Cultural Effects
(e) Any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:	• Earthworks and Land Contamination Effects
(f) Any unreasonable emission of noise:	• Noise Effects
(g) Any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.	• Geotechnical and Flood Hazard Effects

Classification of effects

138. The adverse effects listed above are assessed and summarised in the following section of this report with reference to the descriptions and continuum of effects in **Table 1**.

Table 1: Terminology used to describe an effect's significance

Descriptor of an effect's significance	Meaning
Nil effects	No effects
Less than minor adverse effects	Adverse effects that are discernible but too small to have any meaningful impact
Minor adverse effects	Adverse effects that are noticeable but not at a concerning level, and mitigation or remediation may not be necessary
More than minor adverse effects	Adverse effects that are noticeable and may cause a serious adverse impact but could be potentially mitigated or remedied
Significant adverse effects (that could be remedied or mitigated)	An adverse effect that is noticeable and will have a serious adverse impact on the environment but could potentially be mitigated or remedied.
Unacceptable adverse effects	Significant adverse effects that cannot be avoided, remedied or mitigated

Actual or Potential Effects

(a) Any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:

Economic Effects

139. The economic effects of the proposal are addressed in the Economic Assessment prepared by Market Economics Limited (**Appendix 20)** which draws on the findings in the Industrial Land Market Assessment by Colliers **Appendix 21** and the Industrial Land Demand Assessment by Bayleys in **Appendix 22**. Each of these reports are considered in the subsections below:

Industrial Land Demand

140. Mr Nick O'Styke, the Director of Commercial and Industrial Sales and Leasing at Bayleys Canterbury, has provided an analysis of the industrial land market in Canterbury and the likely demand for industrial land at 104 Ryans Road. His memorandum is attached as **Appendix 22**.

141. The key findings of Mr O'Styke's assessment are that:

- There is a high demand, generally, for freehold industrial land in Canterbury. However, much of the available industrial land in the region is either leasehold or available only on a design-build arrangement, which makes it less attractive to owner-occupiers. Smaller industrial lots (~1000m^2) are also particularly scarce, affecting small and medium-sized businesses. This demand / supply imbalance has escalated land values.

- Industrial land near Christchurch International Airport is highly sought after due to: its proximity to key freight and transport services; the diverse range of businesses seeking to establish in this location (e.g. from large e-commerce companies to smaller manufacturers); resilience of logistics and airport related industry to economic volatility; and, the long-term value offered to investors. There is a persistent shortage of industrial land in this area, leading to significant price increases.

142. Accounting for the factors above, Mr O'Styke concludes that:

> there would be substantial interest in todays (and future) market for land at the Ryans Road Site should the proposal proceed. I consider the approximately 55 hectares of industrial land being proposed will significantly and positively change the district's industrial land supply, and would result in a significant benefit to Canterbury.

Industrial Land Market Assessment

143. Gary Sellars, a Registered Valuer at Colliers, has provided an in-depth analysis of the Greater Christchurch vacant industrial land market in order to assist with identifying the economic benefits of the 104 Ryans Road proposal (see **Appendix 21**).

144. In regard to industrial land supply, this assessment finds that the current vacant industrial land supply in Christchurch City is 474.8 hectares, and in Greater Christchurch (including Selwyn and Waimakariri Districts) it is 786.9 hectares. From a demand side, the average annual take-up of industrial land in Christchurch City from 2018 to 2022 was 58.1 hectares, with a significant increase to 84.0 hectares per annum in the last two years. For Greater Christchurch, between September 2020 and June 2020, the take-up was 57.4 hectares per annum.

145. Relevantly, this assessment finds that there is *"only a limited supply of vacant land across the Greater Christchurch area with this diminishing supply resulting in significant land price escalation over the last four years where land values have increased by as much as 75% over this period"*. The assessment points out the important distinction between land that is freely available and land which is not available to the market or which constitutes a different market in terms of supply and demand, including land owned by the Crown and territorial authorities, or land that is only available in the form of leasehold tenure (such as that owned by CIAL).

146. Accounting for this distinction, the Colliers report finds that for Christchurch City:

- Excluding land owned by the Crown, CCC, ECan and CIAL, the current supply of vacant industrial land will be exhausted in approximately 8.3 years; and

- If the NPS-UD competitiveness margin of 20% in the short and medium term is factored in, the current supply of vacant industrial land will be exhausted in 6.9 years.

147. Evaluating the supply and uptake of the preferred IG and Industrial Heavy (**IH**) zones, Colliers find that the existing supply of IG and IH zoned vacant land will be exhausted in 6.4 years and 9.6 years respectively when the 20% competitiveness margin is factored in.

148. Colliers further state that *"our forecast of existing supply data presents an optimistic picture and does not take into account whether or not the land is actually available to the market or suited to market preference in terms of location and zone type"*.

149. On the basis of this analysis, it is clear that there is a shortage of supply of vacant industrial land in Christchurch, and that supply will likely be exhausted in the short-medium term.

150. However, Colliers' evaluation goes further and examines the specific industrial 'locality and market' supply and demand characteristics in the vicinity of Christchurch International Airport where the subject site is located. They note that there is only 0.6 hectares of freehold industrial land which is vacant and potentially available for development and even if this supply of land is supplemented by that proposed in this application, capacity in this location would be exhausted in 6 years in a pessimistic scenario or 3 years in an optimistic scenario (inclusive of the NPS-UD competitiveness margin of 20%). Accordingly, Colliers conclude that:

> The Site is a logical addition to the industrial district in the vicinity of the airport, where there is an extreme shortage of vacant freehold industrial land which is readily available for development. Rezoning the Site to Industrial General would contribute to satisfying the pent-up demand for land in this locality, close to Christchurch International Airport.

Economic Costs & Benefits

151. Market Economics have provided an economic assessment of the proposal, which considers the project in the context of industrial development capacity and otherwise evaluates the economic costs and benefits of the proposal (**Appendix 20).**

152. That assessment finds that:

> the project aligns with the purpose of the Fast Track Approvals Act 2024 insofar that it will deliver "significant regional or national benefits", including driving regional economic growth, creating employment opportunities, and contributing to Canterbury's broader development objectives.
>
> The project also provides much needed development capacity for industrial land in the vicinity of Christchurch International Airport and for the logistics sector in Christchurch generally, with associated economic benefits.

153. In drawing this conclusion, Market Economics makes the following key findings on industrial development capacity in Christchurch city, in the vicinity of the airport, and in the warehousing and logistics sector:

- **Demand for Warehousing and Logistics land:** is roughly 3.5 times greater than for industrial land long-term.

- **Airport Zone Land Availability:** The Airport Special Purpose Zone offers 112 hectares in total, with only 16 hectares (14.3%) wholly vacant for Warehousing and Logistics. The 16 hectares of vacant land will primarily address a portion of short to medium-term demand, leaving no capacity for growth beyond 2031. Most, if not all, of this land is leasehold, making it unsuitable for businesses requiring freehold land in proximity to the airport.

- **Other Industrial Zone Land Availability:** Per the findings in the Colliers' assessment, freehold industrial land near Christchurch Airport is extremely limited and 104 Ryans Road is the only practical and feasible option to provide needed industrial land capacity near Christchurch Airport.

- **Christchurch-wide Capacity Constraints for Logistics:** Christchurch lacks sufficient development capacity for the logistics sector, likely hindering economic growth.

- **The NPS-UD:** requires sufficient development capacity to meet the demands of different business sectors and the proposal helps fulfil this requirement.

154. Drawing on the points above, Market Economics conclude that the 55 hectare development proposed will help to address shortfalls in industrial and logistics sector development capacity in the vicinity of Christchurch Airport and Christchurch City generally.

155. Market Economics' otherwise identify **significant economic benefits** that will be generated by the project, including:

- **Increased Business Land Supply:** by providing 55 ha of freehold industrial land near Christchurch Airport, addressing the limited supply of such land.

- **Enhanced Industry Co-location:** which supports growing import/export needs with logistics and processing facilities, strengthening Christchurch's role as a trade hub.

- **Market Competition:** by way of increased land supply, reducing monopolistic pricing, improving efficiency, and benefiting buyers and developers.

- **Construction Phase Direct Economic Impacts:** contribute approximately $259m GDP to the local economy, sustaining 755 full-time equivalent (FTE) jobs in the construction sector over the build periods. Taking into account backwards linkages, this level of stimulus sustains 2,205 FTEs and supports $574m in contributions to the Canterbury Region's GDP.

- **Operational Phase Direct Economic Impacts:** Potential to support 1,290 direct jobs in wholesale, transport and storage, and other industrial sectors. Generates over $385m in annual turnover, contributing $178m directly to local GDP. Total employment impact (direct and indirect) of 2,770 FTEs annually, adding $330m to Christchurch's GDP each year.

- **Long-term Economic Contribution:** Provides ongoing economic stimulus through business operations and supply chain linkages.

156. By comparison, Market Economics consider the **economic costs** of the project will be 'modest, entailing an insignificant loss of agricultural land and associated farming activity, in both absolute and regional terms'.

157. In conclusion, Market Economics consider that:

> the project delivers substantial economic benefits at a regional scale, through industrial expansion and land supply (particularly in the vicinity of the Airport), job creation, and market competition, and that these benefits significantly outweigh the low opportunity cost of lost agricultural production.
>
> Accordingly, we are firmly of the view that approval of the project would strongly align with the purpose of the Fast Track Approvals Act 2024 to "facilitate the delivery of infrastructure and development projects with significant regional or national benefits".

Conclusions- Economic Effects

158. The assessments provided by Bayleys, Colliers and Market Economics, as summarised above, point to a consistent picture of:

- High demand for industrial land in Greater Christchurch, Christchurch City, in the airport / Harewood area, and in the warehousing logistics sector, and
- A shortage of supply of unencumbered, freehold, vacant industrial land in Greater Christchurch and Christchurch City, and especially in the airport / Harewood area where the current supply will be exhausted in the short-medium term.

159. These reports also conclude that the proposal will help to address this supply/demand imbalance and the shortfall in the airport/Harewood locality.

160. Aside from the associated benefits of providing much needed development capacity, additional economic benefits will be derived from the project in the form of enhanced industry co-location, market competition, and direct economic benefits through the construction and ongoing/operational phases of the project. Conversely, there will be modest economic costs associated with the loss of rural land and production. For these reasons, Market Economics conclude that:

> Based on our analysis, the economic benefits associated with the development of 104 Ryans Road are substantial. The project is expected to generate a one-off total construction effect of $574 million in GDP for the Christchurch economy, spread over multiple construction seasons. This contribution will support employment across a range of sectors, including construction, engineering, professional services, and supply chain industries.
>
> Once fully occupied, the development will have a sustained operational impact, contributing $330 million in GDP annually to the Christchurch and Canterbury economies. This ongoing economic activity will create and maintain employment opportunities across retail, commercial, and service sectors, supporting local businesses and strengthening regional economic resilience.
>
> Given the scale of these benefits, I conclude that the regional economic impacts of this development under the Fast-track Approvals Act are significant. The project will directly contribute to economic growth, job creation, and increased commercial activity, reinforcing the region's economic base and enhancing its ability to support a growing population.

In addition to these regional benefits, the development is expected to generate positive national-level effects. While these may be highly significant for specific industries that operate nationally and will directly benefit from the Ryans Road development, when considered in the context of the overall national economy, they do not reach the threshold of being classified as significant at a national scale. However, industries such as construction, logistics, and materials supply could experience notable gains from the increased demand associated with this large-scale project.

161. Based on the evaluation above, the project is concluded to have low economic costs and significant economic benefits.

(b) Any physical effect on the locality, including landscape and visual effects:

Landscape and Visual Amenity Effects

162. The effects of the proposal on landscape and rural amenity values have been assessed by Hannah Bruere Senior Landscape Architect at DCM Urban Design Limited. Ms Bruere's report is attached as **Appendix 11** and also provides a graphic supplement and landscape concept plans for the assessment.

163. Ms Bruere has in consultation with the avifauna expert provided a planting plan and list for the 3m landscape strip along Grays and Ryans Roads, the SMA's and street tree planting. These are expected to have a positive effect in terms of increasing canopy cover and indigenous biodiversity on site.

164. The proposed industrial development at 104 Ryans Road is expected to have several effects on the landscape character and values of the area. These have been evaluated at a wider area scale and a local (adjacent property) level.

165. At a wider scale, Ms Bruere considers the proposal to be an appropriate addition to the existing landscape given the mix of rural-residential, agricultural, and industrial land uses in Christchurch's western rural-urban fringe, which is also heavily influenced by activities at CIA (including industrial uses). The development is seen to align well with existing mixed land uses and patterns of industrial development in the area. This semi-rural landscape tends to hold many of the functional requirements of communities, such as transport (e.g. state highways, CIA) and industry, having greater capacity to absorb such functions through being in proximity for logistical reasons, yet distanced from more sensitive urban areas. Proposing further industrial development in the area is therefore not considered inappropriate or out of place in the landscape context.

166. Looking from the northern aspect and from the section of Pound Road adjacent to the site, no landscape strip is proposed, and so open views to the industrial subdivision will be possible. These viewpoints already feature views of CIA and industrial activity, and so an industrial presence is already part of the visual character. Although the site will undergo a significant change, from these wider area outlooks it is not expected to appear unusual or out of place. At an area wide level Ms Bruere has assessed the landscape and visual amenity effects as low to moderate. Using the above scale of effects table this equates to a minor and acceptable effect on the wider environment.

167. At a more local (neighbourhood) level, the change is expected to be more pronounced for the rural neighbours on Grays Road and Ryans Road. The application site will transition from a rural to an urban-industrial character. This will involve a higher intensity of roads, lots, buildings, and general activity, and the site will no longer contribute to the rural farming nature of the area. Instead, it will resemble the industrial expansion seen to the north and east of CIA. Ms Bruere's report considers the visual amenity effects on the rural properties across Grays and Ryans Road in some detail (a site by site analysis) and her report in **Appendix 11** should be referred to, along with her graphic supplement attachment for the location of the assessed viewpoints (Appendix 2, page 9 Character and View Point Location Plan). She has identified that the most affected properties that will experience moderate visual amenity effects are 60 Grays Road, 95, 111, 191 and 211 Ryans Road.

168. For these affected sites along Grays Road and Ryans Road, views will change from open fields with some boundary planting to being enclosed by boundary planting and possible views of industrial buildings over top of the landscape buffer. Although this change will be visually impactful, this is not considered entirely adverse, as this planting can be implemented on site and would have a similar result as existing shelter belt planting in the area, with the addition of industrial buildings being the primary change. As the detailed design of future industrial lots is not yet known, including the scale of buildings and location of driveways, it is anticipated that some of the large scale industrial built form may be visible over top of the landscape strip proposed, as well as along driveways which will interrupt the continuity of the proposed green boundaries. Overall, Ms Bruere considers the effects of the proposal will be moderate as experienced from these properties.

169. From a planning perspective, it is noted that rural / industrial interfaces occur in a number of locations across the city. Effects as assessed above are common at the rural / industrial interface, and are anticipated by the CDP where they occur. For this reason, it is considered appropriate that the built form standards (e.g. road setback and internal boundary setback) of the IG Zone apply to the site with the only modification being the 3m planting strip along the site frontages and the CIA protection surface height limits.

170. In addition to the above change of land use and built form, Mr Bruere has also considered an increase in signage along both Ryans and Grays Road. She notes that the lighting report completed by Pedersen Read, has assessed that illuminated signage will be very limited and is highly unlikely due to lighting restrictions for aircraft safety, with each individual site requiring a lighting assessment. Digital/LED billboards are also not proposed as part of the application for light spill reasons. The proposed activities will comply with the applicable rules in the District Plan that manage glare and light spill, including at the interface between rural and industrial zones. In relation to signage, given the absence of or low numbers of internally lit signs, Ms Bruere considers that the amenity of rural properties surrounding the site will be maintained to the levels accepted by the District Plan.

171. Regarding landscape and visual amenity effects, the proposed mitigation that forms conditions of consent includes:

- The 3m wide native planting strip along Ryans and Grays Roads (to be installed at time of subdivision),
- Street tree planting within the road corridors,

- SMA planting,
- CDP IG Zone built form standards to apply, and
- No digital or LED billboards or signs.

172. Overall, the landscape and visual effects of the proposed industrial subdivision are assessed to be low-moderate, with moderate effects on residents directly adjacent to the site. When evaluated in the Fast-track framework outlined above these effects are not considered significant.

Urban Design Effects

173. The effects of the proposal on urban form and design have also been assessed by Ms Bruere. Her Urban Design report is attached as **Appendix 23**. As well as describing the proposed changes to urban form, Ms Bruere has assessed the proposal against the seven 'C's from the New Zealand Urban Design Protocol. The principles, while non-statutory, encourage good urban design and aim to achieve successful design outcomes.

174. The proposed industrial subdivision at 104 Ryans Road is expected to have urban form effects given the proposed change of land use from a RUF to what will essentially function as a IG zone. The proposal will introduce urban activities to the application site, which represents a marked difference compared to the current rural nature of the site.

175. The key anticipated urban form and design changes proposed include:

- **Increased density and smaller lot sizes:** The subdivision will result in smaller permitted lot sizes, leading to a greater number and increased density of developments on the site.
- **Greater building height and bulk:** The 'zone change' allows for a greater building height allowance and increased building bulk compared to the current RUF zoning.
- **Proximity of buildings and activities to boundaries:** Future buildings and activities, including yard material storage, are expected to be located closer to roads and internal boundaries.
- **Increased site coverage:** There will be greater site coverage by buildings and storage areas, leading to an increased intensity of built form and structure.

176. While the proposal will introduce an urban form that is distinct from the current rural character of the site, this change is not considered entirely adverse from an urban design perspective, accounting for the following factors noted in the urban design assessment:

- **Context:** The site's location adjacent to CIA, in close proximity to the strategic transport network and the existing industrial development in the surrounding area makes an industrial subdivision an appropriate land use. The proximity to the airport imposes restrictions that limit the desirability of alternative land uses including sensitive activities and rural uses such as cropping that could attract birds. As per the District Plan, there are no cultural, natural or heritage features within (or in close proximity to) the site that set the context for the proposal.

- **Character:** The proposed industrial subdivision reflects the distinctive character and land use around CIA, which consists of a mix of farmed paddocks and industry. The development expands on the 'industry' part of this established character to the south of the airport, while a reasonable level of farmland is maintained by the properties neighbouring the development site. The application site is clearly delineated by Ryans Road and Grays Road, which work well to consolidate the development and separate this from the character of the rural land across the roads particularly to the east and south.

- **Choice:** The proposal provides greater choice and potential locations for businesses in the airport area and in proximity to the strategic road network (SH1 and SH73). The design of the subdivision itself further builds on the provision of choice, through the range of lot sizes that can accommodate an assortment of space requirements and business scales.

- **Connections:** The proposed development aligns with the existing pattern of industrial zones located to the north and east of the airport and the site is well-connected, with a range of transport routes available to and from the site. The physical layout of the subdivision is clear, easily understood, and will be easily navigated in future. A footpath network has been incorporated into the subdivision design, along the internal road network and the Ryans Road and Grays Road extents of the site, to ensure safe pedestrian circulation.

- **Creativity:** The comprehensive design of the subdivision will enhance the local identity of the site, making it a clearly distinguishable place within itself.

- **Custodianship:** The subdivision is not proposed in an area which will adversely compromise landscape, ecological or cultural heritage values, but will be viewed as an extension of existing airport development. As the design of the subdivision and individual lots develop, there will be increased opportunities to provide sustainable solutions, use 'green' technology and incorporate renewable energy sources. At a high level, the subdivision incorporates Crime Prevention Through Environmental Design (CPTED) principles. As the development progresses, there will be opportunities to integrate CPTED principles, to ensure a safe feeling environment is maintained.

- **Collaboration:** The proposal for an industrial subdivision has required input from several disciplines to achieve a full understanding of the site and develop appropriate design solutions. Future development of the site will continue to rely on the expertise of various consultants, including engineers, planners, architects and landscape architects, to achieve high-quality and sustainable outcomes.

177. Overall, the urban design assessment concludes that the proposed industrial subdivision at 104 Ryans Road and future development in accordance with the IG Zone rules is supportable from an urban design perspective and is not anticipated to have any adverse urban design related effects, considering the site's location, existing context, and alignment with urban design principles and planning policies.

Lighting Effects

178. It is proposed that the IG lighting standards in the CDP will apply to the future development of the site for industrial purposes rather than the existing RUF lighting standards. There are also several specific lighting rules in the District Plan that are relevant to the proposal, including those

that relate to CIA and seek to ensure that lighting does not interfere with, or confuse, the navigation systems at the airport. These rules preclude:

- **Rule 6.3.4.5 NC1:** Any activity that results in a greater than 2.5 lux spill (horizontal or vertical) into any land outside the Specific Purpose (Airport) Zone that is within 500 metres of the threshold of a runway at Christchurch International Airport.

- **Rule 6.3.4.5 NC2:** Any non-aeronautical ground lights in the areas shown in Appendix 6.11.7.4 that shine above the horizontal.

- **Rule 6.7.4.2.6 PR4:** Production of direct light beams or reflective glare that could interfere with the vision of a pilot excluding: normal operational reflection from glass and mirrors used in motor vehicles; and normal operational light from motor vehicles (applies to the REPA only).

179. The above rules are illustrated / mapped in Figure 5 over the page**Error! Reference source not found.**.

180. The lighting and glare effects of the proposal have been assessed by Justin Evans, Senior Electrical Engineer at Pedersen Read. Mr Evans' report is attached as **Appendix 15**. Mr Evans considers that compliance with Christchurch District Plan (CDP) rules and the Civil Aviation Authority (CAA) rules (which are very similar to the CDP rules) is crucial to ensure the safety of aircraft operations and avoid potentially significant adverse effects on the environment. For this reason, the application is made on the basis that the existing airport related lighting standards will all be complied with both during the subdivision/ construction phase and when sites are subsequently developed for industrial uses. Mr Evans' assessment illustrates that achieving compliance with the standards is achievable for the proposed industrial uses, subject to recommended consent conditions that form part of the application in **Appendix 18**.

181. The key issues addressed by Mr Evans are summarised as follows:

- Construction stage lighting;

- Lighting within 500m of the runway;

- Horizontal light spill from non-aeronautical ground lights;

- Lighting effects on rural neighbours; and

- Lighting effects on ecology.

Figure 5: Areas affected by Lighting rules (Source: Pedersen Read)

182. For construction/subdivision stage lighting, it is simply proposed that no construction requiring artificial lighting during the hours of darkness will be permitted at the site and this restriction is included in the conditions package in **Appendix 18**. This will ensure that both CIA and adjacent rural neighbours will not be impacted by construction lighting. Further, the subdivision stage will involve the installation of streetlights and Mr Evans has included some advice on this, particularly where streets are within the 500m threshold of the runway. He has recommended that:

- All streetlights should meet the CCC Infrastructure Design Standard Part 11 (Lighting for roads and public spaces) following the technical parameters of PR4 for local roads: Average horizontal illuminance ≥1.3lux; Point horizontal illuminance ≥0.22lux and Illuminance (horizontal) uniformity ≤8;

- Within 500m of the runway streetlights shall have ≤2.5lux spill; and

- Employing flat glass light fittings with zero upward light component and no tilt for street lighting.

183. These recommendations form proposed conditions of the subdivision consent.

184. The future development of lots within 500m of the runway threshold are also particularly sensitive to lighting effects. Within this area Mr Evans has recommended that illuminated signage not be

permitted and that there is no exterior lighting within 500m of the runway threshold, including façade and yard lighting that would allow nighttime outdoor yard work. These restrictions are included in the proposed consent conditions package.

185. Future development of individual sites (Phase 2 of the project) will require careful controls on a per-project basis to ensure that horizontal light spill is appropriately managed. Mr Evans' assessment (table 2, page 21) demonstrates that in Phase 2 the potential effects of artificial lighting can be managed using a range of options that can be tailored to each industrial use by the future individual site developers. He recommends that a site-specific assessment of artificial lighting should be carried out by an appropriately experienced and qualified lighting designer, familiar with the requirements of the CAA and CDP, as an integral part of the development of each site (lots 7 - 126). Mitigation measures would be put in place to manage the effects identified in the site-specific report. A condition of consent is proposed that requires each site to have a lighting assessment by an appropriately qualified lighting engineer or designer at building consent stage to demonstrate compliance with the relevant rules. Given the significance of this issue, and that the responsibility for managing these Phase 2 effects are being passed on to future owners, a consent notice is recommended so that these requirements are not missed later in the process and new owners clearly understand the requirements. These measures, when implemented, are assessed to reduce the severity of lighting effects to no more than minor.

186. Regarding effects on rural neighbours, the application proposes that the IG Zone light rules apply to activities and buildings being developed within the site. However, it is noted that regardless of permitting the higher lighting levels *within* the site, the CDP rules also require compliance with the RUF standards at the rural boundaries. As noted elsewhere in this assessment, the RUF and IG zones share boundaries in a number of locations across the city. As such, the CDP lighting standards that are proposed as conditions of consent are considered appropriate for managing effects at the rural/industrial interface.

187. Accounting for the proposed conditions and the advice of Mr Evans, the lighting and glare effects of the proposal are considered minor and acceptable.

Transport Effects

188. The transport effects of the proposal have been assessed by Nick Fuller, Principal Transport Engineer at Novo Group. Mr Fuller's Integrated Transport Assessment is attached as **Appendix 10** and is based on the Capture Scheme Plans in **Appendix 3**.

189. Access to the development will be from Ryans Road and Grays Road via four new internal roads. Roads 1 and 2 are accessed from Ryans Road and Roads 3 and 4 from Grays Road. The new roads will be formed as local industrial roads. The existing Ryans Road and Grays Road frontages adjacent to the development will be upgraded from a rural profile to an industrial profile with the inclusion of a kerb and footpath on the development side of the roads. The carriageway and new intersections will be widened to support the proposed development. All roads shall be laid out, constructed and vested in general accordance with the standards set out in Appendix 8.10.3 and in Chapter 7 of the District Plan, except where alternative standards are specified in the application.

190. Mr Fuller's assessment has been undertaken on the assumption that that the Council will reduce the speed limits on Ryans Road and Grays Road to (ideally) 50km/h (although potentially 60km/h) along the site frontage as a result of the subdivision urbanising the area. This reduction in speed

limit would require a speed threshold treatment to be located on Ryans Road east of the Grays Road intersection as shown on the Capture Plans.

191. A summary of the key transport effects identified in Mr Fuller's report is provided below.

192. At a strategic road network level, he considers that the site location aligns well with the aspirations of the Christchurch Strategic Transport Plan for the freight network, due to its proximity to the strategic road network and the airport. The proposed development is predicted to generate 774 vehicle movements per hour in the AM peak, 705 vehicles per hour in the PM peak, and 8,804 vehicles per day. Approximately 830 of those movements per day will be heavy vehicle movements. The effects of this level of generation has been assessed on the surrounding road network.

193. The primary focus of the network effects assessment is on locations where capacity concerns have been identified, specifically the SH1 / SH73 intersection, SH73 / Pound Road intersection, and to a lesser extent the SH1 / Ryans Road and Pound Road / Ryans Road intersections.

194. The modelling indicates that the SH1 / Ryans Road intersection is not expected to experience significant capacity issues as a result of the proposal. Similarly, the SH1 / George Bellew Road / Syd Bradley Road Interchange is predicted to have negligible change in operation.

195. The effects at the Pound Road / Ryans Road intersection are considered acceptable given the relatively low scale of deterioration as a result of the increased traffic and the planned upgrade by the NZ Transport Agency on the wider network. Increases in traffic are predicted on Ryans Road (between Pound Road and Grays Road), Grays Road, and Pound Road (south of Ryans Road). Growth in southbound traffic in the PM peak on these roads is partly attributed to traffic seeking alternate routes to the congested SH1 / SH73 intersection.

196. Further, regarding Ryans Road and Grays Road, the increased heavy vehicle volumes are expected to affect the existing road edges (edge-break) requiring additional maintenance. To mitigate these effects, it is proposed to upgrade these roads along the site frontage side with kerb, channel and a footpath. It is not proposed to upgrade the opposite side of the road with curb and channel or an increased shoulder width.

197. The traffic modelling detailed in the QTP report (as included in Appendix 5 of Mr Fuller's report) identifies some deterioration in operation at the SH1 / SH73 intersection and the SH73 / Pound Road intersection.

198. The SH1 / SH73 intersection is currently over-capacity in both the 2024 and 2038 models even without the proposed development. The inclusion of traffic from the proposed development in the 2038 model exacerbates these existing capacity issues, but the increase is noted as not significant. In the morning peak, the highest increase in delays is predicted on the SH73 east approach right turn (to SH1 north), increasing from 174 seconds in the base model to 205 seconds with the development. Other increases in delay are no more than six seconds, and the overall intersection delay increases from 95 seconds to 102 seconds. In the afternoon peak, the most noteworthy increase in delay is on the SH1 north approach through movement, which increases from 105 seconds in the base model to 117 seconds with the development. The overall intersection delay increases from 95 seconds to 102 seconds with the development included.

199. Despite these increases, Mr Fuller considers that the effects of the proposed development at this intersection are considered acceptable. This is due to the low scale deterioration in operation resulting from the development and the fact that the NZ Transport Agency is planning and funding an upgrade to this intersection. Funding for the investigation and implementation of improvements has been allocated through the State Highway Investment Programme.

200. The SH73 / Pound Road intersection is predicted to be over-capacity in the 2038 afternoon peak even without the proposed development. When the traffic generated by the development is added, it remains over-capacity. The critical movements are identified as the through and right turn from the Pound Road southern approach. Specifically, the modelling shows that delays on the through and right turns from the Pound Road southern approach are predicted to be 137 and 143 seconds respectively in the 2038 base model (without the development), with volumes of 475 and 59 vehicles per hour. With the development added, these delays are expected to increase to 195 and 200 seconds with volumes of 459[4] and 65 vehicles per hour respectively.

201. However, the QTP report (Appendix 5 to Mr Fuller's report) identifies the potential mitigation measure of altering the lane markings on the Pound Road north and south approaches, which would also require two circulating lanes around the roundabout. The QTP report considers these works to be necessary regardless of the proposed development and suggests that the NZ Transport Agency simply needs to undertake the altered line-marking to optimise the operation of this intersection. Therefore, it is considered that there is no need to delay the subdivision and development of the site until these works occur.

202. In relation to future development of the individual lots, compliance with the transport access and layout standards of the District Plan (based on the Urban standards) would be required. Any non-compliance would be addressed through standard resource consent processes.

203. Overall, Mr Fuller concludes that the proposed activity will have acceptable and no more than minor transport effects, particularly once planned mitigation measures are in place. Based on the advice of Mr Fuller and the roading details provide in the Capture Scheme Plan (**Appendix 3**), the transport effects of the proposal are considered minor and acceptable. Conditions are proposed in relation to upgrading the frontage roads, engineering standards and vesting of roading infrastructure with CCC.

Strategic Infrastructure/ Reverse Sensitivity (Airport)

204. Given the location of the site approximately 170m from the end of the main C02/20 CIA runway, converting the land use to industrial has the potential to result in effects on the safe and efficient operation of CIA. This is one of the key considerations for the application. As described in the statutory context section above, the site is also located within the 55 dB Ldn Air Noise Contour and the 50 dB Ldn On-Aircraft Engine Testing Noise Contour and under the airport protection surfaces, with the western-most portion of the site being located in the CIA designation and REPA.

205. Given its importance to the region/country CIA is recognised in the Canterbury Regional Policy Statement (**CRPS**) and CDP as regionally significant infrastructure. The CRPS and District Plan both afford the CIA a high level of protection to provide for its continued safe and efficient

[4] Whilst it appears counterintuitive that this volume would decrease with the development traffic added to the network, this is a result of road network upgrades associated with the proposal and associated re-routing of trips to other parts of the network (i.e. drivers choosing alternative routes).

operation. Of particular note, the CDP provides for aircraft protection at CIA in chapter 6.7 and 6.7.4. The objectives and policies in Chapter 6.7 generally cover the safe and efficient operation of aircraft by avoiding physical obstructions in protection areas including the REPA, avoiding activities that could interfere with aircraft navigation and minimising the risk of aircraft accidents.

206. The rules and appendices in this subchapter provide for aircraft protection in the following forms, all of which are relevant to this application:

- **Aircraft Protection Surfaces for Christchurch International Airport -** These are defined surfaces in the airspace above and adjacent to the aerodrome (see CDP Appendix 6.11.7.1 and 6.11.7.2). Activities that protrude through these protection shafts are restricted or prohibited to enable aircraft to maintain a satisfactory level of safety while manoeuvring at low altitude in the vicinity of the aerodrome.

- **Runway End Protection Areas -** These relate to four specific areas located at the end of the runways for the Christchurch International Airport (see CDP Appendix 6.11.7.3). The provisions in the District Plan seek to avoid activities at the ends of runways that would interfere with the vision of a pilot or exacerbate the effects of an aircraft accident. For example, the provisions seek to avoid unwanted light sources, the mass assembly of people, most buildings, and the use and storage of hazardous substances.

- **Birdstrike Management Area** (within 3 km of the thresholds of the runways at CIA and new landfills) - Activities that have the potential to attract birds are managed within a defined radius of CIA, to avoid or mitigate the potential for increased risk of birdstrike on aircraft taking off and landing (see CDP Appendix 6.11.7.5 for the extent of this area). Examples of activities the provisions seek to manage include the creation of new water bodies, fish processing plants and abattoirs within the Birdstrike Management Area, and new landfills within Christchurch District.

207. Further to chapter 6.7.4 other protections provided to the CIA include the lighting and noise rules already discussed above. These assessments will be drawn on below in relation to aircraft navigation and reverse sensitivity.

208. To address potential effects on the safe and efficient operation of CIA and to avoid effects on aircraft safety, the general approach taken in the application is to comply with the status quo protections afforded to the airport by the District Plan provisions. This is reflected in the proposed package of consent conditions. The only exception to this is a non-compliance in relation to sizing of the proposed stormwater basins (which exceed 1000m^2) and their proximity to one another (less than 500m apart).

209. In considering aircraft safety and the efficient operation of the CIA the applicant has engaged experts in avifauna, civil engineering (earthworks / dust), noise and lighting. In addition, they have also undertaken preliminary consultation with CIAL, Airways and CAA, acknowledging that some of these parties may also be invited to comment on the application as part of the fast-track process. Copies of the correspondence with these parties is attached as **Appendix 24**.

210. The different types of effects on the airport are addressed below.

Protection Surfaces

211. The approach (CDP Appendix 6.11.7.1) and take off (CDP Appendix 6.11.7.2) slope protection surfaces are mapped on pages 6 and 7 of the Capture scheme plans in **Appendix 3** in relation to the application site, as they are otherwise difficult to interpret as inserted in the CDP. The protection surfaces essentially result in maximum height limits for buildings and structures including planting and temporary equipment such as cranes at the site. The Capture plan extrapolation of the surfaces shows that the height of the protection surface increases in an easterly and southerly direction away from the runway (e.g. from 11m at the centre of Lot 123 to more than 40m at Lot 121). The resulting height limit of 11+m for most sites easily accommodates industrial uses and buildings with many warehouses being 8 - 15m high. The most affected lot is Lot 123 where the protection surface will preclude industrial buildings in the western-most portion of the site.

212. Overall, the protection surfaces are not considered a barrier to the site being developed for industrial uses. A condition of consent is proposed that requires compliance with the current District Plan rules in 6.7.4.1 (Protection surfaces). Given this is potentially a key effect of the proposal and the relevant CDP appendices are difficult to interpret, a second condition (with associated consent notice on future titles) is also proposed in relation to height limits for buildings and structures (whether permanent or temporary) with reference to the protection surfaces mapped in the Capture plans. This will ensure that future purchasers and developers of the lots will be aware of the protection surfaces and height limits.

213. In summary, provided that compliance with the relevant CDP rules is achieved, the industrial use of the site does not increase safety risk.

Navigation

214. Regarding navigation aids, the meeting held with Airways provided information regarding the navigation systems located on the southern end of the main runway. Three devices were discussed including the CO2/ 20 approach lighting, the instrument landing system (**ILS**) and the Doppler VHF Omni Directional Range (**DVOR**) which is a ground-based radio navigation aid used by aircraft to determine their bearing and position relative to a beacon. Refer to **Figure 6** below for the current location of the ILS and DVOR.

215. Within the parts of the site covered by the CIA designation buildings are not permitted without CIA approval as the Requiring Authority under s176A of the RMA and the REPA further restricts buildings and structures. As shown in Figure 6, the DVOR will remain protected in these areas.

216. However, the DVOR is not afforded the same protection where the application site is not within the designation and REPA in the south-western corner of the site, where the RUF zone rules currently apply over the area of land now proposed as lots 58 - 60. The RUF zone currently allows for farm buildings to be erected in this location with a height of up to 12m (noting the aircraft protection surfaces would allow for approximately 14m - 17m in this location), 10m from the internal boundary and 15m from the road boundary. In addition, there would be no constraint on the height or extent of planting (e.g. shelterbelts, woodlots, etc) or structures that are not defined as buildings (e.g. artificial crop protection structures, shipping containers, fencing, etc) along this boundary. Accounting for this existing framework, the applicant proposes that any part of any building, structure, tree or utility on Lots 58–60 shall not exceed 12m height and not be closer than 10m to the internal boundary and 15m from the road boundary. Thus, the risk of conflict with

the DVOR remains the same as the existing situation for buildings and is otherwise reduced for vegetation and structures that are not defined as buildings.

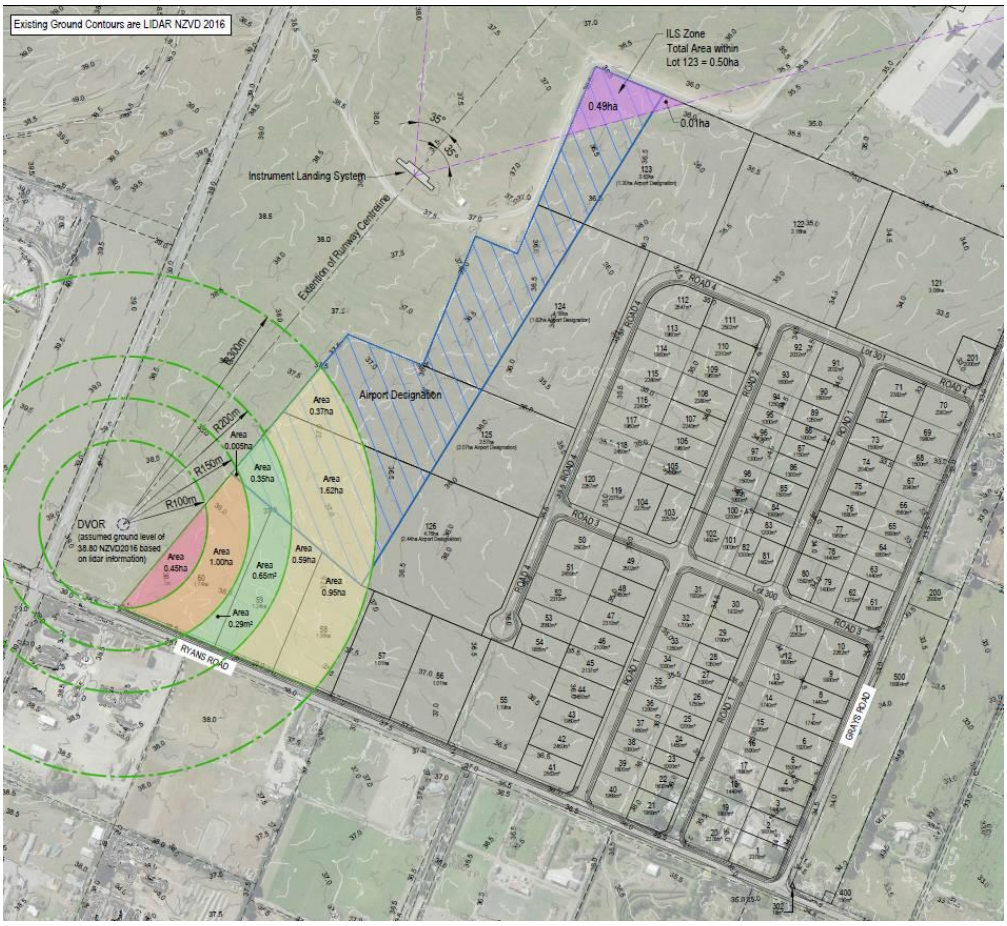

Figure 6: DVOR Setbacks

217. The portion of the site affected by the ILS where it radiates towards the north with a 35º off set is largely under the designated area so is also protected by the provisions in the CDP except for a 100m² area of proposed Lot 126.

218. To the extent that the C 02/20 approach lighting is a relevant navigation aid, this will be protected by way of a consent condition, as recommended in the lighting assessment, that will require each site (Lots 7 - 126) within the subdivision to have a site-specific lighting assessment to ensure proposed activities will not have lights that shine above the horizontal.

219. In summary, subject to the conditions on development as described above, the industrial use and development of the site will not diminish (and to an extent will increase) the protection currently afforded to navigation aids.

Birdstrike Risk

220. The proposed SMA's require consent pursuant to Rule 6.7.4.3.3 RD2 (Birdstrike Management) as they do not meet one of the activity specific standards in P3 requiring that the combined area of all stormwater basins and/or water bodies (that are wholly or partly within 500m of the proposed

water body or stormwater basin's edge) does not exceed 1000m². As guided by the CDP, consideration is required in relation to the scale and significance of birdstrike risk likely to be created by the proposal and mitigation of the risk, including by design measures, operation or management procedures, direct intervention practices and monitoring. Further, as a non-complying activity the change of land use to industrial also needs assessing in terms of any increased birdstrike risk.

221. Birdstrike risk for CIA has been considered by Lizzie Civil, Avian Ecologist and Service Leader - Ecology at PDP. Ms Civil's assessment is attached in **Appendix 9** and is summarised below.

222. The scale and significance of risk created is very low given the size and context of the stormwater basins which are small scale and have been designed by a stormwater engineer to fully drain within 48 hours of the cessation of a 2% AEP storm (see **Appendix 13**) with sufficient rapid soakage overflow capacity to minimise any ponding of stormwater outside the infiltration area. It is noted that such mitigating drainage requirements are proposed to form consent conditions. Further, the characteristics of the stormwater basins should not result in any increase in avifauna water habitat attractants due to fast infiltration rates, however the flat depressions could create roosting areas for spur-wing plovers and gull species that will need to be managed. Planting within the SMA's will be from list in Appendix 6.11.9 of the CDP to avoid bird attracting species.

223. Overall, Ms Civil has considered that the habitat change that would result from the proposal will not increase the level of bird strike risk for CIA. It is proposed that there will be a reduction in scattered mature trees, removal of derelict buildings/structures, and an increase in human presence. It is predicted that this will result in a decrease in overall bird presence.

224. While there is likely to be a change in the relative abundance of bird species, with a reduction in small seed-eating birds and a possible increase in species that prefer urban environments (including roof tops) such as Southern black-backed gull, red-billed gull and rock pigeon, this can be appropriately managed. Buildings will be primarily used for logistics and warehousing operations, and industries with a high degree of bird food attractance (e.g. fish and meat processing and outdoor landscape yards) will be excluded. It is not expected that birds will be attracted to the area for foraging purposes.

225. Ms Civil recommends a Wildlife Hazard Management Plan (**WHMP**) be implemented both pre- and post-development in consultation with CIAL. This will further ensure pre-development elements, including landscape planting, stormwater, and lighting designs, are well-informed with mitigated risk. The WHMP will also allow ongoing post-development wildlife hazard management mitigations with a planned approach. Ms Civil's assessment has demonstrated that there are a range of options that can be included in a WHMP for the site that will ensure that bird strike risk will not increase as a result of the development.

226. Regarding pre-development (or construction/ subdivision phase), Ms Civil recommends CGL provide a site WHMP as part of its consent condition suite. The WHMP should be prepared with consideration given to the existing CIA WHMP to detail management methods to help reduce bird strike risk associated with the site and CIA airport operations.

227. Specifically, the WHMP should outline:

- Pre-development mitigations e.g., mowing site grass to disperse birds in a southward direction away from the CIA flight path.

- Communication plan of development timelines with CIAL before development works take place to mitigate potential avifauna issues and offer support if any issues arise.

- Roles and responsibilities - includes liaising with external stakeholders (e.g. CIAL) to determine the obligations of respective organisations and their personnel.

- Passive and active management methods – surveillance and monitoring, grounds management specifications (e.g. recommended grass heights to deter high-risk species), and seasonal bird counts (this could be completed by CIAL and/or site surveillance personnel).

- Landscape and waterbody design standards and mitigations.

- Monitoring and review procedures of WHMP – this should include liaison with CIAL with increases in bird numbers onsite being communicated so appropriate counter-measures can be implemented.

228. Regarding post-development, Ms Civil recommends that continued use of a WHMP is required and a site representative is assigned to conduct monitoring of the site, noting bird numbers, changes in abundance and the presence of high-risk species. This person should also be responsible for communicating relevant information to CIAL, especially if there is an increase in high-risk bird species activity. Measures such as covering any outdoor waste storage areas to prevent foraging in bins will also be required.

229. Accounting for conditions excluding high bird attracting activities, requiring quick draining stormwater basins, control of plant species, and ongoing requirements of WHMP's, the effects of the proposal regarding birdstrike are considered to be less than minor and acceptable, and preferable to rural activities such as cropping. It is recommended that the pre-construction WHMP relates to the subdivision consent and that the post-development WHMP (requiring implementation in perpetuity) relates to the land use consent, with a consent notice on lots 1–126 to alert future owners to the enduring nature of the WHMP.

Reverse Sensitivity

230. Reverse sensitivity relates to the potential for a new activity (in this case the proposed industrial uses) which may be sensitive to effects generated by an existing lawful activity (e.g. aircraft noise at CIA) to generate complaints. The risk is that such complaints may lead to restrictions or limitations on the existing activity. The mere presence of adverse effects on neighbours or, for that matter, complaints in the absence of adverse effects does not necessarily produce reverse sensitivity effects. It is the potential for restrictions or limitations on the operation of the existing lawfully established activity as a result of those complaints that represents the effect.

231. Reverse sensitivity concerns for CIA primarily relate to complaints about noise from 'sensitive activities' such as residential uses, guest accommodation, education activities, retail activities, commercial services and offices.

232. To address this potential effect, the conditions proposed in the application specifically exclude residential activities, residential units, guest accommodation and education facilities from the activities sought in the consent. It is also noted that the IG Zone provisions that are proposed to apply to the site do not permit commercial services and only provide for retail and office activities

ancillary to industrial uses. Stand-alone office activities would not be provided for. Ancillary office and retail components of industrial uses would be required to meet the acoustic insulation requirements of rule 6.1.7.2.2 (Activities near Christchurch Airport). This reduces the potential for complaints that may in turn result in curtailing of CIA activities.

233. The expert acoustic assessment of Mark Lewthwaite, Senior Acoustic Engineer and Director at Powell Fenwick (see **Appendix 4**) also considers the reverse sensitivity effects related to establishing industrial activities adjacent to aircraft taking off and landing. He notes as follows:

> Time-average noise levels are expected to be between 59 - 65 dB LAeq during the daytime periods and approximately 3-4 dB quieter during the night-time period, and could be expected to be up to 100 dB Lpeak. All levels are well below hearing protection thresholds of 85 dB LAeq and 140 dB Lpeak, which is directly relevant to functional amenity and safety in outdoor areas where noise is not reduced by a building envelope.
>
> There are precedents for industrial airport activities adjacent to the CIA runways, and industrial heavy activities in the location northeast of the runway near Logistics Road.

234. In conclusion, the establishment and operation of industrial uses as per the IG Zone rules (subject to the above exemptions) and meeting acoustic insulation standards where relevant will avoid reverse sensitivity effects on CIA.

Conclusions on Strategic Infrastructure / CIA

235. Based on the expert advice received, consultation undertaken, and the mitigation measures proposed in the application, any effects on CIA will be minor and acceptable.

Climate Change and Greenhouse Gas Emissions

236. Paul Farrelly, Principal Consultant - Energy and Carbon at Lumen has carried out a Greenhouse Gas Emissions Overview of the proposal. Mr Farelly's report is attached as **Appendix 25**. The relevant and key points of his assessment are summarised below:

- The site is located in proximity (2km) to CIA, being the largest employment centre in the South Island, a major logistics hub with several large distribution centres located at Dakota Park, and excellent accessibility and connectivity to Canterbury's strategic arterial road network.

- The site is flat, with good ground conditions which means the amount of embodied carbon required in building foundations (a key component of building emissions) is limited.

- The proposal leverages existing infrastructure by way of Ryans Road and Grays Road, meaning minimal new infrastructure (and embodied carbon) is required to be developed.

237. Overall, Mr Farrelly considers that the proposed industrial subdivision and development adjacent to the southern end of CIA will contribute to a reduction in greenhouse gas emissions and fundamentally meets requirements for supporting emissions reductions. He concludes that the proposal does not give rise to significant adverse effects related to greenhouse gas emissions.

238. In addition to the above, Mr Farrelly identifies that there are multiple opportunities to further enhance sustainability and energy efficiency within the development. These opportunities are not essential but could strengthen the development's long-term environmental performance. Such

initiatives would need to be developer imposed or encouraged, or voluntarily adopted by future business activities establishing and as such measures may not be feasible for all activities establishing. CGL will encourage use of energy and water efficient technologies were possible.

239. In conclusion, based on the advice received from Mr Farrelly any climate change and greenhouse gas related adverse effects are less than minor and acceptable.

Highly Productive Soils and Rural Production

240. The site is classified as having LUC class 2 soils and is currently used for grazing purposes. Given the proposed change of use to industrial activity the productive potential of the versatile soils at the site will be lost.

241. The NPS-HPL requires regional councils to map highly productive land in their regional policy statements within three years of the NPS-HPL coming into force. In the interim period before mapping occurs, land must be treated as highly productive land for the purposes of the NPS-HPL if it, at the commencement date: is zoned General Rural or Rural Production; and is zoned LUC 1, 2, or 3; but is not: identified for future urban development; or subject to a council initiated, or an adopted, notified plan change to rezone it from general rural or rural production to urban or rural lifestyle.

242. Legal advice attached as **Appendix 37** has been obtained addressing whether the site, which is zoned Rural Urban Fringe, is a "General Rural or Rural Production Zone" for the purpose of the NPS-HPL. The legal advice is that the site is <u>not</u> zoned General Rural or Rural Production and therefore the NPS-HPL <u>does not</u> apply under the definition of highly productive land.

243. An assessment against the NPS-HPL has nevertheless been undertaken in case the panel adopt a different interpretation and decide that the RUF does constitute a General Rural or Rural Production zone and the NPS-HPL is therefore relevant. A full assessment of the provisions in the NPS-HPL is set out in **Appendix 32** and summarised in the section of this AEE titled 'Relevant Provisions of Planning Instruments'. Otherwise, evaluation of the proposal's effects on versatile soil resources and rural production is set out below, with reference to the NPS-HPL framework.

244. The NPS-HPL provides a framework for assessing a change of land-use from rural to urban on highly productive land (e.g. policies 7, 8, and 9 and clauses 3.6, 3.8, 3.9 and 3.10). Whilst this proposal is for resource consent rather than 'urban rezoning', the implementation provisions in the NPS-HPL concerned with rezoning (and clause 3.6 especially) provide relevant guidance to this application insofar that it proposes to urbanise rural land.

245. Whilst the provisions of the NPS-HPL restrict urban rezoning except in specific circumstances, its policies aim to balance development needs with the importance of maintaining land for agricultural and horticultural purposes.

246. Effects on versatile soils and rural production have been assessed by Victor Mthamo, Senior Environmental Science and Engineering of Reeftide Environmental & Projects Limited (**Reeftide**) with reference to NPS-HPL framework. Mr Mthamo's assessment is attached as **Appendix 26.** In summary the key points in his assessment are as follows:

- Site-specific constraints affecting the agricultural productive potential of the site include moisture deficits and the limited availability of irrigation water in this allocation zone. Without

sufficient irrigation, the LUC 2 soil within the site will never achieve its full productive potential and will remain limited.

- Nutrient limits in the Christchurch West Melton Nutrient Allocation Zone (a 'Red' zone), are identified as a long-term constraint that compromises the productive potential and economic viability of the soils on site.

- The current low productivity across the site and the inherent limitations due to water availability and nutrient restrictions indicate that the use of the land for land-based primary production is not economically viable.

- The bird strike risk and proximity to the airport also impacts the potential for farming activities. Farming activities, particularly horticulture and cropping, have the potential to increase bird populations due to nesting and feeding opportunities. The proposed industrial development, comprising dry industries like warehousing and logistics, is considered less likely to encourage bird populations to the same extent. The change in land use that could potentially reduce the risks associated with certain agricultural activities near the airport.

- The potential for fragmentation of large geographically cohesive areas of highly productive land is not a concern due to the site's boundaries (Ryans Road, Grays Road, CIA land) and the mixture of zoning and existing land uses on surrounding land. Based on these factors, the report concludes that the proposed development will not result in the fragmentation of large and geographically cohesive areas of highly productive land.

247. Mr Mthamo (see **Appendix 26)** concludes that there are multiple long-term constraints on the capacity of the site to support primary production activities. The productive potential of the soil is already constrained by factors such as limited irrigation water and nutrient restrictions. Mr Mthamo otherwise notes that the proportion of highly productive land that the site represents within the Canterbury Region (0.01%) and Christchurch District (0.59%) is insignificant. Overall, Mr Mthamo's assessment considers that the proposed industrial development is a more suitable land use considering these existing constraints and the potential risks associated with agricultural activities near the airport, rather than directly causing negative effects on the soil itself.

248. For completeness, it is also noted that the proposed industrial use of the site will not have any significant reverse sensitivity impacts on surrounding land-based primary production. Industrial activities are not typically sensitive to neighbouring agricultural practices. There are existing examples of industrial and rural activities coexisting in the district, suggesting they are not inherently incompatible

249. In conclusion, legal advice is that the NPS-HPL does not apply to the subject land, but in any event (and even accounting for the NPS-HPL framework), the proposal's effects on versatile soil resources and rural production will be minor and acceptable.

Three Waters Infrastructure

Water Supply

250. Water supply is proposed to be provided from the CCC Northwest Water Zone via a new water reticulation network and vested to CCC as public infrastructure (see the PDP design in **Appendix 12**). A new DN355 PE100 main will be installed along Russley Road and Ryans Road to the development site from the existing 375mm water main outside 50 Russley Road. A booster pump

is required at the development (on proposed lot 400) to achieve the required pressure of 25m across the entire development site. All water supply infrastructure will be designed and constructed in accordance with the requirements of the CCC IDS and CSS. The application does not propose that the Water Take Permits for the existing bore will be transferred to the applicant for industrial use.

251. PDP has estimated a peak design flow of 58 L/s for the development, based on a per-lot design usage. CCC commissioned water supply modelling undertaken by WSP on behalf of CCC during the pre-application phase indicated that the required peak demand flows cannot be supplied at the minimum operational pressures of 25m at the boundary for all lots, particularly in the more elevated parts of the development. The modelled operational pressure varied between 23 and 26m at the site.

252. Therefore, PDP propose that a booster station is required to meet the minimum operational pressure requirements across development, which will be provided on Lot 400 at the entry to the development. The booster station is designed to operate 'offline', allowing the development to be serviced directly by the Northwest water supply zone pressure during low demand periods. The modelling suggests that the development can be serviced to FW3 standard fire classification (50 L/s) from the existing flows and pressures in the Northwest water supply zone.

253. A FW3 classification requires that 50 L/s of fire flow is available from up to three hydrants with 25 L/s of this being available within 135m of the building and the additional 25 L/s being available within 270m of the building. There must be a minimum residual pressure of 10m at the hydrants. An FW3 classification also requires that the largest firecell within a building has a floor area of no more than 599m^2.

254. Standard water supply conditions have been provided by CCC and are included in the consent condition package (see **Appendix 18**). These generally cover design standards, vesting of infrastructure (utility lots) and firefighting standards. Accounting for the conditions, any effects on water supply to the site and on the wider network are considered minor and acceptable.

Wastewater

255. Wastewater reticulation is proposed to be serviced by the CCC wastewater network via a new LPS reticulation network (see the design in **Appendix 12**), given that the nearest pump station is 1.6km from the site. This will involve the establishment of private pump stations on individual lots that pump to a common pressure sewer pipe network. The LPS network will discharge to the existing CCC wastewater manhole (WWMH ID24959) on Russley Road and will be vested to CCC as public infrastructure.

256. CCC had WSP (as their modelling consultant) assess the impact of the proposed development on its wastewater network. Modelling indicated that while sufficient capacity existed downstream of WWMH ID1807 on Yaldhurst Road for 25 L/s, the existing 225mm sewer on Russley Road and Yaldhurst Road did not have the capacity to convey 25 L/s without surcharging. To address this the PDP Three Waters Servicing Report highlights that the proposed LPS system will result in a significantly reduced maximum flow of 9.1 L/s compared to the 25 L/s used in the initial CCC modelling. The existing 225mm sewer along Russley Road to Yaldhurst Road has an estimated full pipe flow capacity of approximately 20 L/s and currently receives very little flow (estimated current maximum flow upstream of WWMH ID1807 is 4.1 L/s). The Three Waters Servicing Report concludes that there is ample capacity in the wastewater network downstream of the

proposed connection point to receive the estimated maximum flow of 9.1 L/s from the development.

257. To ensure that odour and corrosion are managed appropriately, a McBerns GM300 Ground Mount Odour Filter (or similar) will be installed and the receiving connection manhole (WWMH ID24959) and the next three manholes downstream will be treated with a corrosion-resistant coating.

258. Standard wastewater conditions have been provided by CCC and these are included in the consent condition package (see **Appendix 18**). These generally cover design standards/specifications, vesting of infrastructure, odour, corrosion and the ongoing ownership of the lots local pressure systems by the lot owners (to be a consent notice). Accounting for the conditions, any effects on the wastewater network are considered minor and acceptable.

Stormwater

259. It is proposed that operational stormwater runoff generated from proposed roads, footpaths and berms be collected in sumps and conveyed via a reticulated network for treatment and attenuation (see **Appendix 12** and **Appendix 13**). Attenuation is to one of two first flush infiltration basin/soak pit systems (SMAs) on lots 200 and 201 which are sized to meet the requirements of the CCC Wetlands, Waterways and Drainage Guide and a 2% AEP flow, prior to discharge to ground. The basis of this design approach has been developed to remove potentially significant contaminants (e.g. heavy metals and hydrocarbons) expected to be within the operational-phase stormwater runoff from trafficable areas. The development has been divided into two stormwater catchment areas, northern (Lot 201) and southern (Lot 200) to manage road reserve runoff. Each SMA will include an infiltration basin and overflow soak pit. Both stormwater reserves will contain a planted stormwater basin, with planting meeting the bird strike management requirements.

260. All road related stormwater infrastructure will be designed and constructed in accordance with the CCC IDS and CSS. It is proposed that the reticulation network and stormwater management devices will be vested to CCC who will be responsible for ongoing maintenance and ownership.

261. Operational stormwater runoff generated by the 126 lots will be to private onsite stormwater systems to provide treatment and disposal to ground via infiltration devices. Runoff from roofed areas will be collected and be disposed to ground with no treatment (as it is considered clean) by onsite soak pits sized to accommodate the critical design event (3hr 2% AEP). All other stormwater generated on the lot from hardstand areas will be directed to an onsite proprietary treatment device for treatment of the “first flush” flow prior to disposal to ground via a soak pits sized to accommodate the critical design event. The use of proprietary treatment has been considered for this development to maximise available hardstand and undertake all stormwater management/ disposal below ground (due to CIA). A consent notice is proposed in relation to each lot to provide for first flush treatment of hardstand and roofs within the lot at time of building consent.

262. Through pre-application consultation it has become apparent that CCC prefer hardstand stormwater from individual allotments to be conveyed to a central stormwater management area to be collectively treated and discharged. In CGL and PDP's experience with other similar industrial developments in the region (e.g. I-zone in Rolleston) CCC’s preferred method is not adopted by other councils (including Selwyn and Waimakariri) which allow for stormwater to be

managed on individual sites. PDP are of the view that the proposed system is robust and will not result in adverse stormwater effects.

263. CCC has stated that it would not approve the discharge from the individual allotments under its global stormwater consent. Therefore, a global discharge consent for the individual allotments is sought as part of the application as well as a separate discharge consent for the discharge from the two infiltration basins which manage and treat the road runoff.

264. With the exception of the stormwater discharge for individual lots, the CCC provided stormwater consent conditions are acceptable to the applicant. Accounting for the conditions, any effects on the wastewater network are considered minor and acceptable.

Water Quality Effects (Ground and Surface Water)

Ground Water

265. The effects of the proposed stormwater discharges to ground (construction, operational for the stormwater basins, and global operational for the 126 lots being created) have been assessed by Alesha Watkins (Environmental Scientist) and Nic Love (Service Leader - Water Services) of PDP. Their Technical Assessment of Ground Water Quality report is attached as **Appendix 27**. Details of the proposed stormwater system design including treatment prior to discharge are provided in the PDP Stormwater Management Technical Report and Three water Infrastructure Servicing Report attached as **Appendix 13** and **Appendix 12**. The construction phase discharges are covered in the Capture EMP in **Appendix 16**.

266. The key findings of the Water Quality Technical Assessment are summarised below:

- **Bacterial Contamination:** The groundwater contaminant transport modelling indicates a low probability (0.04%) of E. coli concentrations exceeding recommended guidelines in the closest downgradient domestic supply bore.

- **Metal Concentrations:** The expected concentrations of metals like chromium, copper, lead, and zinc in untreated stormwater runoff are below the Maximum Acceptable Values (MAV) and Aesthetic Values (AV) set by the New Zealand Drinking Water Standards and Schedule 8 of the LWRP groundwater quality limits. Further reduction in metal concentrations will occur after treatment using basins and proprietary treatment devices.

- **Hydrocarbons:** Concentrations of total petroleum hydrocarbons and total polycyclic aromatic hydrocarbons are typically below detection limits, and the proposed treatment devices have high removal rates (90-100%) for these substances. Therefore, no effects on groundwater users from metals or hydrocarbons are anticipated as a result of the discharge.

- **Groundwater Mounding:** Mounding assessments suggest that the disposal of stormwater to the ground is not expected to be inhibited by groundwater mounding effects. The modelling considered both long-term and short-term mounding due to stormwater infiltration.

- **Community Drinking Water Protection Zones:** The Community Drinking Water Protection Zones do not overlap with the site, and it is not expected that the stormwater discharge will affect these drinking water supplies.

267. Overall, the assessment suggests that the proposed stormwater management plan will adequately manage any potential adverse effects on groundwater quality. The plan includes treatment, attenuation, and disposal to the ground of site runoff. Measures involve collecting runoff from roofed areas and hardstand areas, treating the "first flush" flow, and using infiltration basins and soak pits. These mitigation measures are detailed in the proposed consent conditions in **Appendix 18**

268. Any effects on groundwater quality associated with the discharge are considered to be less than minor subject to robust erosion and sediment control as proposed in the conditions attached as **Appendix 18**.

Surface Water

269. During construction of the culvert along the artificial drain along Ryans Road, it is proposed that water will be dammed and diverted via a stabilised channel and discharged back into the same drain east of the application site. The proposed works are outlined in the description of the proposal above and are detailed in the Capture Earthworks Management Plan in **Appendix 16.**

270. Works within the bed of the PWNR channel, including the damming and non-consumptive take and discharge from the watercourse, has the potential to adversely affect the quality of surface water and associated ecosystems. This could occur by way of the mobilisation of sediment in the waterway and disturbances / alterations to existing habitat and passage for fish.

271. To ensure that water quality in the drain is maintained the implementation of a ESCP will be necessary and consent conditions are proposed as part of the package in **Appendix 18.** All riparian earthworks and vegetation clearance (grass, gorse hedge and exotic trees) are to be undertaken in accordance with an ESCP. Through adherence to the ESCP, any adverse effects on the artificial watercourse will be less than minor.

272. In addition to the ECSP, fish salvage during the diversion has been recommended by the project ecologist and requested by rūnanga in order to maintain the ecological values of the waterway. This is covered in further detail in the ecology section below.

273. In summary, any effects on the water quality of the drain will be less than minor, accounting for erosion and sediment controls as proposed in the conditions attached as **Appendix 18**.

(c) Any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:

Ecology and Biodiversity Effects (Herpetology, Freshwater and Avifauna)

Herpetology

274. Lachie Davidge, Freshwater and Terrestrial Ecologist and Jarred Arthur Technical Director Ecology at PDP have assessed the site for native lizard habitat and potential effects on lizards. Their report, survey work and a LMP are attached as **Appendix 7** and **Appendix 38**. The assessment below relates to the effects that require consideration under the relevant district and regional plans and LMP.

275. A WAA permit to capture and translocate lizards is sought as part of the Fast-track application and the requirements in relation Schedule 7 of the FTAA2024 relating to Wildlife Act 1953 are addressed by the ecologists in **Appendix 7**.

276. From preliminary site visits, the ecologists identified that the development site at 104 Ryans Road contained lizard habitat including rank grass, rock and debris piles, dense foliage, leaf litter and abandoned farm buildings.

277. Detailed baseline surveys for the presence of herpetofauna specimens were carried out at the site a by PDP ecologists in late March – early April 2025 (and a population of southern grass skinks (conservation status: 'at risk – declining') were identified (refer to surveys in **Appendix 38**).

278. As Lizards arepresent on site, adverse effects on native lizards will be mitigated via the implementation of the LMP that forms part of the application. The LMP provides full details for the management of lizards, including methods for lizard salvage and relocation, accidental discovery protocol, staff responsible for the work, and the procedure for reporting findings to the relevant authorities. Adherence to the ecologists' recommendations and the LMP will ensure that effects on native lizards are appropriately mitigated. PDP has recommended consent conditions which are proposed as part of the application in **Appendix 18**.

279. Accounting for the above, the effects of the proposal on native lizards are considered minor and acceptable.

Freshwater

280. Mr Arthur has also assessed the freshwater habitat and ecology at the site and his report are attached as **Appendix 8**.

281. Mr Arthur has found that there are no natural surface water or wetland features on, or likely within 100m of, the site at 104 Ryans Road. He notes that the water race (lateral channel of the PWNR) that flows along Ryans Road is an artificial hydrological feature (not meeting the definition of a river in the LWRP) but may contain some limited aquatic values due to the potential presence of native fish populations. The fish species present (if any) are most likely to be small native bullies, but it is possible that some eels or brown trout are also inhabiting the race. Given the artificial, highly managed characteristics of the PWRN, Mr Arthur does not consider it necessary, in an ecological context, to retain or enhance the water race adjacent to the project site boundary.

282. However, to manage the effects of piping approximately 840 m of the race, he recommends that the following condition (or similar) be included as part of the consent:

> Prior to any diversion or construction within the bed of flowing water races, a qualified freshwater ecologist must undertake the salvage and translocation of freshwater fish. Any species caught must be translocated to a nearby reach of waterway unimpacted by the works. Any pest species caught should be humanely destroyed and disposed of.

283. The consultation responses from Te Ngāi Tūāhuriri Rūnanga and Te Taumutu Rūnanga also included a recommendation for fish salvage. Given the advice received, fish salvage conditions are included in the conditions package in **Appendix 18** in line with the ECan's standard conditions.

284. Mr Arthur and the rūnanga support the implementation of robust sediment and erosion control measures being implemented to mitigate any potential discharge effects from earthworks on aquatic life in the open race. A ECSP is discussed in more detail below in relation to earthworks and water quality.

285. Accounting for the proposed conditions, the effects of the proposal on freshwater ecology are considered minor and acceptable.

Avifauna

286. Lizzie Civil has assessed the site in relation to endemic avifauna habitat and impacts of the proposed subdivision and industrial use. Her assessment is attached as **Appendix 9** and is summarised here. The impacts of the proposal in relation to bird strike at CIA are covered in the strategic infrastructure section above and the effects of lighting on avifauna have been considered above.

287. Bird surveys undertaken by PDP recorded 14 avian species and a total of 284 individual birds counted. Four of the 14 species are classified as New Zealand endemics. The four endemic species observed during avifauna counts were two swamp harriers (not threatened), a single pūkeko (not threatened), long-tailed cuckoo (nationally vulnerable) and a South Island pied oystercatcher (declining). There were no signs of these species nesting/breeding onsite.

- Swamp harriers create a raised bed nest of sticks, grasses and assorted vegetation on the ground or situated within crops, shrubs and tall grass between October to December (NZ Birds Online, 2024). Given the site is large and currently abundant with favourable nesting vegetation it is possible that they may breed on site, but no signs were seen during the site visit.

- Pūkeko commonly create nest hollows near waterways or on floating platforms. There is an irrigation race along the frontage of Ryan Road however it is poor quality and unlikely to be used as Pūkeko habitat.

- Long-tailed cuckoo lay their eggs in yellowhead, whitehead and brown creeper nests. None of these species were seen on site during our site visits.

- South Island pied oystercatcher commonly breed near the sea on shell banks or rock substrate. It is highly unlikely they would choose the site as a breeding location.

288. Given the above assessment the development of the site for industrial uses is unlikely to displace endemic bird species from breeding locations / habitat. Any effects in this regard are considered less than minor and acceptable and no conditions are required regarding endemic avifauna.

Biodiversity and Ecology Conclusions

289. Based on the advice of the ecologists at PDP, the effects of the proposal on lizard, freshwater and avifauna ecology are considered minor and acceptable.

(d) Any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:

Cultural Effects

290. The site is not within any identified overlays for sites of Ngāi Tahu cultural significance (Wāhi Tapu/Wāhi Taonga; Mahaanui Iwi Management Plan Silent Files and Kaitōrete Spit and Ngā Taranga Tūpuna. The PWRN (drain) is also not covered by the Ngā Wai overlay in the District Plan. However, this does not mean it is of no cultural value to Ngāi Tahu. As is the case with any potential discharge to a waterway or change of land use, there may be impacts on the likes of indigenous fauna and flora, mahinga kai values and on the mauri of water.

291. The Mahaanui Iwi Management Plan (**IMP**) objectives for papatuanuku (land), and wai maori (water) are primarily concerned with 'inappropriate land use' and 'managing effects' in the context of Ngāi Tahu cultural heritage. Regarding cultural values, it is noted that the applicant proposes to remediate areas of contamination, carefully manage stormwater sediment run-off to the drain during diversion and once established ensure that contaminants from hard stand areas are treated prior to discharge. This accords with the principals in the IMP and will ensure the cultural values of the waterway and groundwater are maintained.

292. The application also includes planting a 3m landscape strip along the Ryans Road and Grays Road Frontage (length of 1660m) and two SMA's that will be planted with natives (from the CDP non-bird attracting list). There is no existing indigenous vegetation present on site that is being removed to enable the development. Regarding indigenous fauna, the project's ecologists have identified that there is no evidence of native bird species nesting at the site, however there are native lizards present . Lizard surveys (**Appendix 38**) have been undertaken identifying southern grass skinks on site and a Lizard Management Plan is proposed as part of the application in attached **Appendix 7**. An assessment of the proposal against the Ngāi Tahu subdivision and development guidelines is contained in **Appendix 28**. Effects on ecological and waterways values are assessed in further detail under separate headings above.

293. The following rūnanga hold mana whenua over the project's location, as it is within their takiwā:

- Te Ngāi Tūāhuriri Rūnanga. A copy of the preliminary feedback from consultation with Te Ngāi Tūāhuriri is attached as **Appendix 29**.

- Te Taumutu Rūnanga. A copy of the preliminary feedback from consultation with Te Taumutu Rūnanga is attached as **Appendix 30**.

294. A preliminary information package outlining the proposal and scheme plans was provided via Mahaanui Kurataio Limited (**MKT**) in late January and early February 2025 for initial consultation with rūnanga. The feedback received from both rūnanga noted that the proposal has been reviewed by kaitiaki representatives on a preliminary basis as the full AEE and Ecology reports have not been provided. As such, the full impacts on mana whenua values have not been assessed and both rūnanga have requested to see a completed application to enable full consideration of mana whenua values.

295. An identical set of feedback has been received from each rūnanga and kaitiaki have identified a number of areas of the proposal that may have resulting cultural effects. The advice received contained recommendations (potential consent conditions) as preliminary feedback to moderate

the effects of this proposed activity on mana whenua values. **Table 22** below sets out the applicants' assessment and comments on these.

Table 22: Assessment of Mana Whenua recommendations

Rūnanga Recommendation/ Requested Condition	Assessment /Comment
General	
An Accidental Discovery Protocol must be in place during all earthworks required to exercise this consent to deal with archaeological finds and protect the interests of mana whenua. This condition does not constitute a response under the Heritage New Zealand Pouhere Taonga Act (HNZPT 2014).	The applicant proposes an Accidental Discovery Protocol condition (see **Appendix 18**).
An ESCP for any earthworks required to give effect to these consents must be prepared, inspected, and maintained in accordance with ECan's Erosion and Sediment Control Toolbox for Canterbury until such time the exposed soils have been stabilised.	Detailed ESCP conditions are proposed as part of the application to be included in both land use and water related consents.
Indigenous planting is required to enhance the cultural landscape, increase indigenous habitat, filter sediment and sequester carbon.	The application includes a 3m landscaped buffer along the length of the Ryans Road and Grays frontages. All planting within this strip will be NZ natives, however, it may not be indigenous locally sourced species as the avifauna advice has limited this to the species that are not known bird attractors due to the proximity to CIA. Where native species are not ideal, such as for the use of street trees, specialist avifauna advice has been obtained.
Every indigenous vegetation removed must be replaced with two equivalent species (like-for like) at or near the site through transplantation or other methods, as an offset measure.	Existing planting within the site consists of exotic tree and hedge species. The landscape and ecology assessments undertaken have not identified any indigenous vegetation of note. All existing vegetation will be removed from the site. The 3m landscape buffer (with a length of 1160m) planted with native species will significantly increase the native planting at the site.
Ecology	
Fish salvage by a suitably qualified fish expert must be undertaken prior to diverting the water race into pipes.	Fish salvage has been recommended by the applicants' ecologist in relation to the drain diversion and is proposed as a condition of consent (see **Appendix 18**).
A suitably qualified ecologist needs to be present during any works associated with piping the water race for de-fishing.	The fish salvage condition noted above requires a qualified freshwater ecologist to be present to undertake salvage and translocating of fish.
The ecological values of the water race should be assessed prior to the termination or piping of the water race and any ecological values determined in the water race should be protected and in agreement with tangata whenua before any decision is made.	Given only preliminary consultation documents were provided to the rūnanga, the specialist waterways reports were not available at the time. The reports detail the drain is an artificial water course with very limited ecological values. The above fish salvage

	condition is proposed as a precaution and will mitigate any effects.
The consent holder must employ a qualified and experienced herpetologist to survey/scout for native lizards. This must be undertaken during suitable weather conditions (lizard monitoring is undertaken in Canterbury during the months of Sept/Oct – April to coincide with the warm weather). b. Land known to be habitat for lizards must not be impacted by proposed works and must be improved / enhanced to protect and support a locally occurring population of native lizards. c. If relocated, lizards must to be released into a suitable and recognised habitat. d. The outcomes of this survey must be provided to Mahaanui Kurataiao for assessment before final Mana Whenua advice is provided.	Detailed lizard surveys are provided in the attached reports in **Appendix 38**. A condition of consent imposes the implementation of a LMP, a draft of which is attached as **Appendix 7.**
Stormwater	
The design of stormwater infrastructure must have sufficient capacity to prevent ponding at the site.	See the PDP Stormwater Technical Report in **Appendix 13.** No ponding will occur at the site that is not within basins specifically designed for this purpose (and that drain in less than 48 hours).
All stormwater, including that from hardstand areas and roofs must be treated before discharge, including a minimum of first flush treatment and heavy metal treatment.	See PDP Stormwater Technical Report in **Appendix 13.** First flush and heavy metal treatment is proposed for all hard stand areas.
Soakpits must not be installed on soil with contamination level above accepted values.	Any contaminants above acceptable levels will be remediated at the commencement of site works in accordance with a Remedial Action Plan which will be developed by a suitably qualified and experienced practitioner. Soak pits will not be installed within contaminated soils.

296. The rūnanga have requested a second round of consultation is undertaken to allow for review of the full AEE. CGL will provide MKT with a full copy of the AEE when the Fast-track application is lodged with the Environmental Protection Agency (**EPA**) and will continue to consult with rūnanga during the lodgement process. There will also be a further opportunity for the rūnanga to provide comments when invited to do so via the EPA as part of the Fast-track process. The applicant will consider any further comments/advice from rūnanga and how it can be incorporated into the proposal when it is available.

297. The preliminary assessment suggests that the proposal will not give rise to significant cultural effects.

(e) Any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:

Earthworks and Contamination Effects

Earthworks

298. Earthworks are required to construct the proposed subdivision including associated infrastructure (roads, stormwater management areas and piping the drain). The proposed earthworks are detailed in the Capture Report in **Appendix 14** and Earthworks Management Plan (**EMP**) in **Appendix 16**. The EMP provided with the application is by necessity a draft, the details of which will be finalised in consultation with the project engineer when a contractor is appointed.

299. The proposed earthworks do not comply with the regional or district plan requirements due to the volumes involved, the large areas of land to be disturbed and the proximity of the earthworks to the waterway. The development and associated earthworks are proposed to be undertaken in two stages. The earthworks for site development will generally be confined to the roading corridors and construction of infrastructure to limit the area of exposed earthworks at any one time. The proposed earthwork quantities for each stage are summarised in **Table 3** below:

Table 3: Earthworks details

Description	Stage 1	Stage 2	Total
Earthworks volumes in cubic metres			
Topsoil to stockpile	7,470	10,890	18,360
Cut onsite	3,225	4,455	7,680
Fill onsite	3,278	5,652	8,930
Excess spoil from civil works	1,250	1,250	2,500
Cut to stockpile	1,197	53	1,250
Topsoil respread	3,150	3,990	7,140
Earthworks areas in hectares			
Area	2.49	3.63	6.12

300. The maximum anticipated earthwork cut depths are 0.5m associated with roading, 2.5m for civil drainage works, and 5.0m - 6.0m for infiltration soakage pits. Groundwater, indicated to be approximately 11.5 to 18 metres below ground level, is not expected to be encountered during these activities. As a precautionary measure in the unlikely event that ground water is intercepted an Artesian Aquifer Interception condition is proposed.

301. Management of the earthworks is crucial to minimise adverse environmental effects including dust, sediment runoff and stormwater flow paths and ponding in this context. The specific effect of the earthworks and sediment mobilisation for diverting the drain are discussed under the effects on freshwater above.

302. Key mitigation measures that form part of the application include:

- Implementing sediment and erosion controls according to ECan guidelines and best practices**.**
- Limiting works during wet weather and the exposed area, and staging construction**.**
- Progressive stabilisation of completed areas and monitoring of controls**.**

303. Implementing an EMP (see **Appendix 16**) involves:

- Dust control measures such as watering haul tracks and exposed areas, stabilising stockpiles, and limiting dust-generating activities during strong winds. This is particularly important given the proximity of the airport and the heightened risk of dust for this land use.
- Noise and vibration monitoring and adherence to relevant New Zealand and German standards.
- Preparing and implementing a Construction Traffic Management Plan.
- Sediment and erosion controls will be installed prior to the commencement of any earthworks and maintained for the duration of the works. These controls include stabilised site entrances, diversion bunds/channels, super silt fences, and sediment retention areas.
- Overland flow paths for the development will follow the road layout after earthworks to direct stormwater away from lots and future buildings.

304. The general construction sequence will involve a pre-construction meeting, site establishment, installation of erosion and sediment controls, vegetation and building removal, contamination remediation (if required), topsoil stripping, excavation and cut/fill balance, stockpiling and stabilisation of excess cut, re-topsoiling and progressive stabilisation, installation of services, road construction, removal of erosion and sediment control devices, and final landscaping.

305. The application includes earthworks conditions based on CCC and ECan standard conditions, which are proposed in **Appendix 18**. Accounting for these conditions, earthworks will be appropriately managed so that effects are less than minor and acceptable.

Contamination

306. The NES Soil is a relevant statutory document that must be considered when subdividing or changing the use of a piece of land. A DSI was undertaken by Tetra Tech, and is attached as **Appendix 6**. The report includes a review of the site history, field observations and soil sample analysis.

307. The site has historically been used for agricultural and cropping purposes. A review of historical aerial photographs indicate that the site has been mostly agricultural land with a residential

building and sheds in the southeast corner. Whilst there is no record of any HAIL activities on the site on ECan's LLUR, the property file notes a compliant about stockpiling and burning of tree waste.

308. Tetra Tech undertook a site walkover and identified potential HAIL activities including chemical storage (HAIL A2) and soil stockpiling (HAIL A1). Disused buildings, metal cans with chemicals and sacks of chemicals were also observed, as well as large tanks for grain storage, barrels and sheds for farm equipment.

309. Soil sampling was undertaken in a grid pattern across the site, with targeted sampling around buildings. In total 48 locations and 51 samples were taken, testing for heavy metals, organochlorine pesticides and asbestos. Results from the sampling concluded that most soil samples were below human health guidelines, except for two hotspots around the buildings where arsenic exceeded the guidelines. Notably, topsoil from all field/paddock samples were free from contaminants or below background levels and can be reused on site.

310. Based on the above, the NES Soil applies due to the presence of contaminants above background concentrations and the development will exceed the permitted activity criteria for soil disturbance volumes and duration, as such resource consent is required as a restricted discretionary activity under the NES Soil.

311. The applicant's suitably qualified and experienced expert in land contamination will develop a Remedial Action Plan (RAP) for the site outlining the remediation requirements. The RAP will be submitted to the local authority for their records. Post remediation, further sampling will be required to validate the site post building or infrastructure removal, and a Site Validation Report (SVR) will be produced and sent to the Councils. The development and implementation of a RAP and SVR are volunteered as consent conditions.

312. In conclusion, contaminated soils can be appropriately managed by standard practices and any risk to human health or in regard to runoff to waterways are less than minor and acceptable.

(f) Any unreasonable emission of noise:

Noise Effects

313. The noise effects of the proposal have been assessed by Mark Lewthwaite Senior Acoustic Engineer and Director at Powell Fenwick. His acoustic assessment is attached as **Appendix 4** and considers a number of potential noise effects including:

- Noise from future industrial activities, including effects on nearby rural dwellings;
- Noise from Increased traffic generation;
- Noise from construction;
- Safe noise levels for workers; and
- Reverse sensitivity effects for CIA (as covered above in the strategic infrastructure section).

314. Prior to considering the above effects, it is important to understand the existing noise context of the site as it is uncharacteristically noisy for a rural property (as demonstrated in Mr Lewthwaite's survey work). In summary, the existing noise environment at the proposed development site is characterised by significant noise contributions from aircraft operations at CIA and road traffic on surrounding major roads including Russley Road / State Highway 1 and Yaldhurst Road / State Highway 73. Existing industrial/commercial activities at 614 Pound Road (Outdoor Storage and Truckyard) and at 252 Ryans Road (Wood Incineration Activity) and more distant sources such as Ruapuna Speedway and quarries further north on Pound Road also contribute to a lesser degree. This results in ambient noise levels that are elevated compared to typical rural settings and that are already above District Plan permitted levels of noise for rural zones, particularly at night-time (by approximately 10dB).

315. Noise generation from future operational activities within the industrial development affecting people living in rural dwellings is the primary noise effect. In particular, the rural dwellings in the adjacent RUF Zone at 83, 95, 111, 191, and 211 Ryans Road and 60 Grays Road have been considered by Mr Lethwaite. He makes the following salient points as to why these parties are not affected in a more than minor way:

- The existing time-average and maximum noise levels, primarily from road and air traffic, are already a notable margin above the applicable rural zone noise limits (in the order of 10 dB above the night-time standard).
- A majority of general industrial activities can be designed to comply with rural noise limits and there is no fundamental incompatibility between General Industrial Zone activities (as defined in the application) and the surrounding rural environment.
- In the less likely event of non-compliant noise levels, practicable mitigation and management measures are expected to be available.
- An IG / RUF interface occurs in a number of locations across the city's urban edge and the District Plan noise provisions account for this scenario.
- Regarding night-time operations in respect of activities with yards, truck manoeuvring areas at road frontages, or factory building openings close to and facing road frontages, a condition of consent could be imposed requiring a noise report by a qualified acoustic engineer to mitigate the risk of non-compliance. However, this is not considered necessary to mitigate effects.
- Compliant activities are expected to have minimal additional noise effects in this environment.

316. Regarding noise from traffic on nearby public roads generated by the proposed development, Mr Lewthwaite does not anticipate this to affect people living in nearby rural dwellings. Mr Lewthwaite concludes that the expected 0-2 dB increases in road traffic noise associated with the proposed industrial development will generate minimal additional noise effects.

317. The internal sound environment of retail activities and ancillary offices would be required to meet District Plan Rule 6.1.7.2.2. The greatest sound reduction would be in the order of 30 dB Dntw + Ctr which is achievable with practicable enhancements to light-weight construction elements. Considering the above noise factors, the establishment of industrial activities within the

development site near to CIA is appropriate and has precedent. Further the expected noise levels on the proposed industrial development site from airport operations are generally below the thresholds requiring mandatory hearing protection in outdoor areas.

318. It is important that construction is managed to mitigate noise effects on rural dwellings. This is particularly the case given the scale of the proposal which requires the use of heavy equipment, producing both noise and vibration. An appropriate means of identifying construction noise levels and planning for mitigation and management measures is an appropriately qualified and experienced acoustic engineer developing a Construction Noise and Vibration Management Plan, in conjunction with the construction contractor(s), or reviewed by the contractor(s) prior to implementation. This is recommended as a condition of consent.

319. Mr Lewthwaite considers that the operation of industrial activities at the site will result in minimal additional noise effects on rural dwellings, and that the noise environment is suitable for industrial activities to operate safely.

320. The following acoustic consent conditions are proposed by the applicant:

- Compliance with the noise standards in 6.1.4 (General Noise Rules) and 6.1.5 (Zone Specific Noise) of the District Plan as if the site was zoned IG.
- The development and implementation of a construction management plan that includes noise and vibration mitigation measures including compliance with NZS 6803 construction noise.

321. Accounting for the conditions and the advice of Mr Lewthwaite, the acoustic effects of the proposal are considered minor and acceptable.

(g) Any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.

Geotechnical and Flood Hazard Risks

Geotechnical Hazards

322. A geotechnical assessment of the site was undertaken by Chris Thompson of Tetra Tech Coffey to determine the suitability of the site for development. This assessment is attached as **Appendix 5**.

323. The key conclusions of the geotechnical assessment are:

- The site is classified as ‘Class D – Deep or soft soil sites’ according to NZS1170.5.
- The site has a low risk of geotechnical hazards including:
    - Erosion: due to the flat topography and proposed stormwater system.
    - Falling debris: there are no slopes or exposed hills or rock faces.

- Liquefaction-induced settlement: the site is in an area of low liquefaction vulnerability with unsaturated soils above dense gravels and groundwater estimated at greater than 10m bgl.
- Inundation: with appropriate stormwater and flood control systems, the risk is considered low.

- The site has relatively uniform layers of topsoil, sand and sandy gravel.
- Groundwater was not encountered in site-specific test pits, a conservative groundwater level of 10m bgl is recommended for design.
- Soakage rates show variable infiltration rates, with the rate of TP-04 considered likely achievable with sufficient embedment into the gravel layer.
- As part of the proposed earthworks, it is recommended topsoil to be stripped and fill material checked for suitability, or otherwise be replaced with engineered fill if required.

324. The assessment recommends the need for lot-specific geotechnical reports to address the specific design criteria of each new structure at the site at time of building consent. A condition and consent notice to this effect are proposed in the conditions package (**Appendix 18**).

325. The assessment concluded that the site is geotechnically suitable for a subdivision and future industrial construction providing a lot-specific geotechnical report is completed for each new structure. Mr Thompson's advice is accepted, and any geotechnical hazards are considered less than minor and acceptable.

Flood Hazards

326. The site is not within any existing mapped flood zones or overlays in either the LWRP or CDP. However, as a non-complying activity flood hazards have been considered by Ben Throssell, Senior Engineer with PDP. Mr Throssell's assessment is attached as **Appendix 31.**

327. The flood hazard assessment for 104 Ryans Road considers several potential flood sources as follows:

- **Waimakariri River flooding:** While the Waimakariri River poses a historically significant flood risk, the assessment concluded that it is not considered a likely source of high hazard flooding for the site. Extensive flood protection works, such as upgraded primary stopbanks and a secondary stopbank system, provide a high level of resilience. The primary stopbank is designed to contain a 5500 m^3/s event, which significantly exceeds the largest recorded historical flood of approximately 4000 m^3/s.
- **Localised flooding**: Localised flooding, resulting from intense rainfall exceeding soil drainage capacity, is not expected to present a high hazard. The site's well-drained sandy gravel substrate, with high infiltration rates, minimises the risk of significant ponding. Any localised flooding is anticipated to be of low hazard and effectively managed through stormwater design (See the stormwater assessment above).

- **Overland flow paths**: Overland flow paths at the site were analysed using LIDAR and the rational method. The assessment found that the largest identified flow path, with a contributing catchment area of 0.3 km², is expected to convey a 500-year event within its natural channel without exceeding a depth of 180 mm. Given the gentle terrain slope and calculated flow characteristics, this flow path is unlikely to generate high hazard flooding as per the CRPS criteria.

328. The assessment was conducted in accordance with CRPS Policy 11.3.1, which defines high hazard flooding as flood depths exceeding 1 metre or a depth-velocity product greater than or equal to 1, assessed for the 0.2% AEP (500-year) event.

329. Overall, the flood hazard assessment indicated that none of the identified flood sources are expected to result in high hazard classifications for the site, and the site is considered suitable for development from a flood hazard perspective. Mr Throssell's advice is accepted, and any flood hazards are considered less than minor and acceptable. No flood hazard conditions are proposed as part of the application.

Conclusion – Actual and Potential Effects on the Environment

330. In summary of the assessment above, the proposal will generate no more than **minor** actual or potential adverse effects on the environment and those effects are assessed as being acceptable.

331. Given the above, there are no effects that reach the threshold of a “sufficiently significant adverse impact” such that they need to be taken into account in terms of an assessment under s 85 of the FTAA2024.

Relevant Provisions of Planning Instruments

Introduction

332. An assessment of the activity against the relevant provisions of the applicable statutory and non-statutory planning instruments (under the RMA) (see clauses 5((1)(h) and 5(2) of Schedule 5 of the FTAA) is included in **Appendix 32** with the findings summarised below.

333. It is important to note that given the application is tantamount to a de facto plan change, the assessment in **Appendix 32** and the summary which follows below also considers policy that legally only applies to plan changes but is still relevant to consider as to whether the application meets national policy aims and objectives. For example, Policy 8 of the NPS-UD relates to plan changes that would add significantly to development capacity. To ignore this policy because the proposal is not a plan change would be artificial. To do so would disregard the intent of the NPS-UD to enable sufficient development capacity through the urbanisation of land, through rezoning under conventional RMA processes, or through fast-track consenting under the Act, as is proposed here. For similar reasons, strict 'avoidance' policies in RMA planning documents concerning the urban development and use of rural zoned land (for example in the NPS-HPL, CRPS and District Plan) need to be considered in the context of the FTAA2024 which provides for the urbanisation of rural land by way of resource consent (and without the need for rezoning in the first instance).

334. It is notable that the key consideration for the decision maker is the purpose of the Act. The test for accepting or declining a substantive application, as set out in s 85(3), requires a weighing exercise of any sufficiently significant adverse impacts. However, it does not allow a panel to form the view that an adverse impact is sufficiently significant to be out of proportion to the project's regional or national benefits solely because the adverse impact is inconsistent with or contrary to a provision of a specified Act or any other document that the panel must take into account or consider. The following sections of this assessment evaluate all relevant planning documents/provisions, before reaching a conclusion regarding s 85.

National or Regional Statutory Planning Documents

National Policy Statement for Freshwater Management 2020

335. The NPS-FM provides direction for local authorities on managing freshwater under the RMA.

336. The relevant provisions are assessed in **Appendix 32**. In summary, the NPS-FM emphasises the concept of Te Mana o te Wai, which prioritizes the health and well-being of water bodies, followed by the essential needs of people, and then other uses and its objectives and policies aim to ensure sustainable and equitable management of freshwater resources, balancing ecological health with human needs.

337. Accounting for the findings in the technical assessments on water quality, the assessment of effects on water quality, and the assessment of equivalent provisions concerned with freshwater in other statutory planning documents, the proposal is assessed as being consistent with the sole objective of this policy statement and its associated policies.

National Policy Statement for Indigenous Biodiversity 2023

338. The **NPS-IB** aims to protect and restore the country's unique indigenous biodiversity and provides direction to local authorities on how to identify, maintain, and protect significant natural areas and manage the adverse effects of activities on them.

339. The relevant provisions are assessed in **Appendix 32**. Based on the assessment of potential ecology and biodiversity effects (Herpetology and Avifauna especially), and the assessment of equivalent provisions concerned with indigenous biodiversity in other statutory planning documents, the proposal is assessed as being consistent with the sole objective of this policy statement and its associated policies.

National Policy Statement for Highly Productive Land 2022

340. The NPS-HPL aims to protect highly productive land for use in land-based primary production, ensuring its availability for future generations. Its objectives and policies focus on recognising and protecting highly productive land, restricting urban rezoning except in specific circumstances, identifying and mapping such land, managing adverse effects, supporting productive use, and involving tangata whenua in decision-making processes. These policies aim to balance development needs with the importance of maintaining land for agricultural and horticultural purposes.

341. Legal advice attached as **Appendix 37** addresses whether the site, which is zoned RUF, is a General Rural or Rural Production zone for the purpose of the NPS-HPL. The legal advice is that the site is not zoned General Rural or Rural Production and therefore the NPS-HPL does not apply under the definition of highly productive land.

342. An assessment against the NPS-HPL has been provided in case the panel adopt a different interpretation and decide that the RUF does constitute a General Rural or Rural Production zone and the NPS-HPL is therefore relevant (see **Appendix 32** for a full assessment).

343. Whilst this proposal is for resource consent rather than ‘urban rezoning’, the implementation provisions in the NPS-HPL concerned with rezoning (and clause 3.6 especially) provide relevant guidance to this application (insofar that it proposes to urbanise rural land).

344. Those provisions generally discourage urban rezoning of highly productive land but allow for exceptions under certain conditions. These include existing urban development plans, council-initiated plan changes, and a lack of alternative options for urban development. These exceptions provide flexibility to accommodate necessary urban growth and development when justified.

345. In the case of this proposal, the economic and industrial land market assessments in **Appendix 20**, **Appendix 21** and **Appendix 22** have established a need for more urban industrial land, with limited alternatives available.

346. In conclusion, the legal advice is that is NPS-HPL does not apply to the subject land, but in any event, the proposed urbanisation of highly productive land in this context is considered to be generally consistent with the NPS-HPL, notwithstanding its advancement by way of resource consent rather than rezoning.

National Policy Statement on Urban Development 2020

347. The NPS-UD, updated in May 2022, aims to ensure that New Zealand's towns and cities are well-functioning urban environments. It sets out objectives and policies to support urban growth and development, addressing the needs of diverse communities, including different business sectors.

348. The NPS-UD focuses on creating well-functioning urban environments that enable social, economic, and cultural well-being, improving housing affordability, removing barriers to development, providing sufficient development capacity for housing and business land, and ensuring responsive planning to changes in demand.

349. The relevant provisions of the NPS-UD are assessed in **Appendix 32**. The specific objectives and policies of relevance to this application seek sufficient development capacity suitable for different business sectors and a well-functioning urban environment. They also recognise that urban environments develop and change over time and require responsiveness to proposals that supply significant development capacity.

350. The proposed development is unanticipated by the CDP and CRPS, as discussed in the assessment contained in **Appendix 32**. However, the proposal will add significantly to development capacity and contribute to a well-functioning urban environment. Regarding development capacity, the contribution will be significant, given that the proposal will provide an additional 55ha of freehold industrial land near Christchurch International Airport. This is significant in the context of unencumbered freehold industrial land supply and demand in Christchurch, particularly for the logistics sector and businesses seeking to establish near the airport and SH1.

351. Overall, the proposal is assessed as being consistent with the NPS-UD.

Canterbury Regional Policy Statement

352. The CRPS sets out the policies and objectives to achieve integrated management of natural and physical resources for the Canterbury Region.

353. Relevant objectives and policies to this proposal are found in the following chapters:

- Chapter 5 - Land-use and Infrastructure;
- Chapter 6 - Recovery and Rebuilding of Greater Christchurch;
- Chapter 7 - Freshwater;
- Chapter 11 - Natural Hazards;
- Chapter 12 - Landscape;
- Chapter 15 - Soils;
- Chapter 16 - Energy;
- Chapter 17 - Contaminated Land; and,

- Chapter 19 - Waste Minimisation and Management.

354. These provisions are assessed in **Appendix 32**, and based on that evaluation the proposal is found to have some tension with provisions in Chapter 6 that require new business zones to be located within identified greenfield priority areas (which do not encompass the site). However, as detailed in the assessment of the Chapter 6 provisions, the proposal will not necessarily offend those provisions.

355. The remaining provisions in the CRPS are generally concerned with issues and effects of regional significance, and in that respect, such matters will not arise or will be appropriately managed by way of proposed conditions and/or the attributes of the proposal.

356. Overall, the proposal is therefore assessed as being generally consistent with the CRPS.

Canterbury Land and Water Regional Plan

357. The objectives of the LWRP collectively seek to manage land and water as integrated natural resources (e.g. Objective 3.1), manage the quality and quantity of freshwater to safeguard the life-supporting capacity of ecosystems and ecosystem processes (e.g. Objective 3.8), maintain freshwater bodies and their catchments in a healthy state (e.g. Objective 3.16), protect the natural character of waterbodies (e.g. Objective 3.19), and maintain healthy and productive soils (e.g. Objective 3.23).

358. The key provisions of relevance in the LWRP have been assessed in **Appendix 32**. That assessment notes that the relevant rules and resource consent requirements under the LWRP have been identified and assessed in the AEE with supporting technical assessments that consider potential effects on land and water resources. Based on the assessment of those effects (which concludes that they will be avoided or managed to acceptable levels) the proposal is found to be consistent with the provisions in the LWRP.

Canterbury Air Regional Plan

359. As described in **Appendix 32**, the objectives and policies of the Air Plan broadly seek, in relation to industrial and trade activities and large scale fuel burning devices, the best practicable options to minimise the effects of discharges, manage and in some situations avoid discharges of PM10, manage discharges of odour and dust from solid or liquid waste, and address localised effects of discharges including relative to sensitive receptors.

360. Such discharges are not proposed in this application and any future discharges associated with individual developments will either fall to be permitted under the rules of the Air Plan, or will be assessed in an integrated manner through the resource consent process, with ECan as the consenting authority. At such time as detailed development plans are advanced, various options for the design and management of discharges will be available (if required) to ensure any adverse effects are minimised.

The District Plan

361. The proposal is assessed as being contrary to those provisions in the District Plan that are specific to the district's rural zones, including those in Chapter 17 (Rural) especially. Per the assessment of the Chapter 17 provisions in **Appendix 32**, that conflict is to be expected, given

that the proposal entails urban development of the nature envisaged by the IG Zone on land that is presently zoned for rural purposes.

362. That conflict aside, the proposal is assessed as being:

- Consistent with the strategic objectives in Chapter 3 which include a primary objective (3.3.1) to:
    - Meet the community's needs for economic development (industrial land), without diminishing wellbeing; and
    - Foster investment certainty (for the applicant and those businesses seeking industrial land in this locality and market).
- Consistent with those objectives and policies throughout the District Plan that are concerned with the avoidance or management of effects on the environment; and
- Consistent with the objectives and policies in Chapter 16 (Industrial), including:
    - Objective 16.2.1 which seeks *'The recovery and economic growth of the district's industry is supported and strengthened in …new greenfield industrial zones'.*
    - Policy 16.2.1.1 which seeks to *'Maintain a sufficient supply of industrial zoned land to meet short, medium and long term supply needs of industrial activities, having regard to the requirements of different industries…'.*
    - Policies 16.2.1.3 and 16.2.1.4 insofar that these specify what is envisaged for the Industrial General zone.

363. Overall, if the rural zoning and provisions are set aside (given this proposal seeks to urbanise the land) and the District Plan is considered in light of its strategic objectives, its comprehensive suite of effects-based objectives and provisions, and its objectives for Industrial activity and areas, the application is assessed as being generally (and strongly) consistent with the District Plan in an overall sense.

Proposed Plan or Changes

364. There are no proposed changes to the District Plan of relevance to this proposal.

Non-Statutory & Other Planning Documents

Mahaanui Iwi Management Plan

365. The IMP is the relevant iwi planning document that applies to this proposal.

366. The purpose of the IMP is to:

- Express kaitiakitanga by effectively and proactively applying Ngāi Tahu values and policies to natural resource and environmental management; and

- Protect taonga and the relationship of tāngata whenua to these by ensuring that the management of land and water resources achieves meaningful cultural and environmental outcomes.

367. An assessment of the relevant provisions in the IMP is set out in **Appendix 32**. That assessment includes an evaluation the proposal in terms of the Ngāi Tahu subdivision and development guidelines which guides the implementation of the IMP; and consideration of Te Rūnanga o Ngāi Tahu - Freshwater Policy which provides specific direction on freshwater matters.

368. On the basis of that evaluation, the proposal is considered to be generally consistent with the IMP.

Canterbury Regional Land Transport Strategy

369. As described in the assessment included at **Appendix 32**, the Canterbury Regional Land Transport Strategy establishes the strategic direction for land transport within the Canterbury Region over a 30-year period. The strategy identifies the region's transport needs, the roles of land transport modes along with the planning, engineering, education, encouragement and enforcement methods that will be applied in the achievement of objectives.

370. The proposed development accords with this strategy, insofar that the safety and efficiency of the transport network in the vicinity of the site will not be compromised by the proposal, the development site provides for accessibility by a variety of modes (including potential public transport services) and the site has good connectivity to the local and strategic transport network.

Conclusion - Relevant Provisions of Planning Instruments

371. Having assessed the activity against the applicable statutory and non-statutory planning instruments, if the current rural zoning and provisions are set aside (given this proposal seeks to urbanise the land), it is concluded that the proposal is generally consistent with the relevant provisions in an overall sense. As such, there are no conflicts with provisions that reach the threshold of a "sufficiently significant adverse impact" such that they need to be taken into account in terms of an assessment under s 85 of the FTAA2024.

Relevant Other Matters

Consultation

Consultation

372. The FTAA2024 outlines consultation requirements for substantive applications in section 29(1)(a) and states that authorised persons for listed projects must consult the persons and groups referred to in section 11 before lodging a substantive application. The consultation requirements outlined in section 29(1)(a) are specific to projects listed under Schedule 2, as referred projects undertake consultation with the groups referred to in section 11 as part of their referral application (i.e. a finalised substantive application is not required for consultation to occur).

373. Specifically, section 11 of the FTAA2024 requires consultation with relevant administrating agencies, local authorities (ECan and CCC), iwi authorities/ hapu and Treaty settlement entities (Te Taumutu Rūnanga and Te Ngāi Tūāhuriri Rūnanga) and administering agencies (Department of Conservation) prior to lodgement. A summary of the consultation undertaken to date is presented in **Table 4** below:

Table 4: Consultation summary

Party consulted	Method of consultation	Relevant documents	Summary
Ministry for the Environment (mfE)	Email to MfE 14 April 2025 with full copy of the substantive application.	Email and letter response from MfE dated 15 April 2025 attached in **Appendix 24**.	As requested by MfE the proposal has been assessed against the relevant National Policy Statements (see paragraphs 335 - 351 above and **Appendix 32**) and National Environmental Standards (see paragraphs 118 - 123 and 306 – 312 above).
Canterbury Regional Council	Pre-application meeting with Consents Major Projects Team (Elizabeth Hovell Team Leader and Nardia Feehan Principal Consents Planner), expert water science staff and contamination expert - 16 January 2025. Email exchanges regarding ECan standard condition set and specific subdivision infrastructure conditions.	Pre-application meeting minutes attached in **Appendix 24**.	Where time has permitted draft reports have been shared with ECan staff. A number of the standard conditions have been adopted.
Christchurch City Council	Introduction meeting with Paul Lowe (Manager Resource Consents), Sean Ward (Planning Team Leader) and Francis White (Planner) - 2nd December 2025. Pre-application meeting with CCC Planners (above) and experts including 3W	Pre-application meeting minutes attached in **Appendix 24**.	Advice received has been addressed by technical assessments. Where time has permitted draft reports have been shared with CCC staff. A number of the standard land-use and subdivision conditions have been adopted. Where

	infrastructure, transport, noise, waterways, ecology, urban design and civil engineering/ earthworks - Friday 24th January. Email exchanges regarding CCC standard condition set and specific subdivision infrastructure conditions.		there are disagreements over infrastructure conditions reasons have been provided in respect of the applicant's alternatives.
Department of Conservation	Pre-lodgement consultation request sent on 27 January 2025.	See Department of Conservation Pre -lodgement Consultation response attached in **Appendix 24** received 20 February 2025.	The Department of Conservation raised that detailed lizard surveys were not available as part of the pre-lodgement information sent for consideration. Detailed Lizard Surveys are now provided in the substantive application, see Appendix 38. .
Te Taumutu Rūnanga	Consultation via MKT (an advisory company setup to assist Runanga engage with councils and individuals over resource management issues). Meeting 11th February 2025.	See attached preliminary consultation feedback dated 13th February 2025 attached in **Appendix 30**.	Recommendations received have been addressed by technical assessments and are proposed as consent conditions where possible. Full AEE and supporting technical assessments to be sent to Te Taumutu Rūnanga via MKT at time of lodgement.
Te Ngāi Tūāhuriri Rūnanga	Consultation via MKT. Meeting 29th January 2025.	See attached preliminary consultation feedback dated 4th February 2025 attached in **Appendix 29**.	Recommendations received have been addressed by technical assessments and are proposed as consent conditions where possible. Full AEE and supporting technical assessments to be sent to Te Taumutu Rūnanga via MKT at time of lodgement.
Christchurch International Airport Limited	Meeting with Nick Flack and John O'Dea CIAL - 19th December 2024.	See meeting minutes attached in Appendix **24**.	CIAL comments regarding servicing the site were noted and are addressed by the site being connected to CCC and Orion infrastructure. CIAL comments on aircraft safety in terms of bird strike, lighting and protection surfaces were noted and are addressed in the relevant expert reports. Airways and CAA were subsequently consulted.
Civil Aviation Authority	Meeting with - 28th January 2025.	See follow-up email dated 28 January 2025 attached in **Appendix 24**.	The Construction Management Plan will highlight CAA and Protection Surface Requirements to future

			developers of buildings on the subdivided lots. Discussed CDP rules for protection surfaces and lighting will be met.
Airways	Meeting with Roy McEwan, Michael Stewart, Chris Crequer, and Brandt Li - 28th January 2025.	See follow-up email dated 31 January 2025 attached in **Appendix 24**.	Main query raised was potential effects on the DVOR navigation aid associated with buildings on the SW corner of site. This has been addressed in the application by (as a minimum) maintaining the status quo in terms of the protection afforded to navigation aids in the CDP.
Orion	Meeting 22nd January 2025 with Sian Hughes and Matt Waters.	See follow-up letter from Orion dated 5 February 2025 attached in **Appendix 24** confirming available supply for construction and stage 1 and options for stage 2.	The Capture Infrastructure report addresses construction and stage 1 and ongoing discussions regarding stage 2 will occur.

Section 30(3) Notices

374. Pursuant to s 30(2) of the Act, the applicant has notified CCC and ECan, who have jurisdiction over the area where the approvals would apply, of its intention to apply for approvals described in section 42(4)(a) (resource consent) under the Act. In response, ECan and CCC have confirmed via written notice, in accordance with s 30(3)(b) that there are no existing resource consents of the kind referred to in s 30(3)(a). The ECan notice is attached as **Appendix 33** and the CCC notice is attached as **Appendix 34**.

Owners and Occupiers of Adjacent Sites

375. The FTAA2024 includes requirements to provide contact details of adjacent landowners and occupiers. For resource consent applications, Schedule 5 outlines these requirements in clause 5(1)(d) which states that a resource consent application must include the full name and address of each owner of the site and of land adjacent to the site and each occupier of the site and of land adjacent to the site whom the applicant is unable to identify after reasonable inquiry.

376. The contact details for adjacent owners and occupiers (where able to be identified) are attached in **Appendix 35**.

Mitigation Measures & Monitoring

377. The Act outlines several requirements and considerations for setting consent conditions, depending on the type of approval sought. Clause 17 of Schedule 5 sets out the criteria and other matters for the assessment of a consent application, and clause 18 of Schedule 5 the provisions of the RMA relevant to setting conditions.

378. When setting conditions on a resource consent, the panel must apply Parts 6, 9, and 10 of the RMA that are relevant to setting conditions on a resource consent, subject to all necessary

modifications (e.g. a reference to a consent authority is read as a reference to a panel). Section 83(1) of the Act specifies that a panel when exercising a discretion to set a condition under the Act, must not set a condition that is more onerous than necessary to address the reason for which it is set, in accordance with the provision of the Act that confers the discretion.

379. The conditions proposed as part of the application to address adverse effects or to cover aspects of the subdivision approval for infrastructures design / vesting are attached in **Appendix 18**. This includes monitoring conditions, that describe how and by whom effects will be monitored if the activity is approved.

380. Section 85(3) of the Act relates to a panel discretion to decline an approval under the Act. It does not remove the duty under s 5 of the RMA (as referenced to in the Act) to avoid, remedy or mitigate adverse effects[5]. In this regard, s 108 and s 108AA of the RMA (as referenced in clause 18 of Schedule 5 of the Act) provide the basis for imposing conditions of consent that would avoid, remedy or mitigate any adverse effects. The only limitation the Act applies in terms of conditions is expressed in s 83 which requires that conditions cannot be more onerous than necessary to address the reason for which it is set.

Consideration of Alternatives

381. The preceding assessment of effects shows that the proposal will not have any significant adverse effects on the environment. Therefore, an assessment of alternatives is not required.

[5] While the duty is not removed, the purpose of the Act has primacy in the panel's considerations.

Resource Management Act 1991 Considerations

s106 Considerations

382. Section 106 of the RMA states:

> (1) A consent authority may refuse to grant a subdivision consent, or may grant a subdivision consent subject to conditions, if it considers that—
>
> (a) there is a significant risk from natural hazards; or
>
> (b) (repealed)
>
> (c) sufficient provision has not been made for legal and physical access to each allotment to be created by the subdivision.
>
> (1A) For the purpose of subsection (1)(a), an assessment of the risk from natural hazards requires a combined assessment of—
>
> (a) the likelihood of natural hazards occurring (whether individually or in combination); and
>
> (b) the material damage to land in respect of which the consent is sought, other land, or structures that would result from natural hazards; and
>
> (c) any likely subsequent use of the land in respect of which the consent is sought that would accelerate, worsen, or result in material damage of the kind referred to in paragraph (b).

383. This section of the RMA is particularly relevant in relation to geotechnical concerns following the Canterbury Earthquakes. Geotechnical and flood hazards have been covered in the effects assessment above and in **Appendix 5** and **Appendix 31**.

384. The geotechnical assessment by Mr Thompson recommends the need for lot-specific geotechnical reports to address the specific design criteria of each new structure at the site at time of building consent. A condition and consent notice to this effect are proposed in the conditions package (**Appendix 18**). Overall, the assessment concluded that the site is geotechnically suitable for a subdivision and future industrial construction.

385. The flood hazard assessment indicated that none of the identified flood sources are expected to result in high hazard classifications for the site, and the site is considered suitable for development from a flood hazard perspective.

386. The advice provided regarding the risk of geotechnical and flood natural hazards is accepted, and it is concluded that there are no grounds to refuse consent under section 106(1)(a).

387. In terms of section 106(1)(c) adequate legal and physical access is provided to each allotment.

Part 2 (sections 5, 6 and 7)

388. Information requirements under the Act require an assessment of the activity against sections 5, 6, and 7 of the RMA. Further, clause 17(2)(a) of Schedule 5 of the Act states that a reference in the RMA to Part 2 of the Act must be read as a reference to sections 5, 6 and 7 of the Act (i.e. it removes s 8 as a Part 2 consideration).

389. Section 5 of the RMA sets out its purpose, as follows:

> **5. Purpose**
>
> (1) The purpose of this Act is to promote the sustainable management of natural and physical resources.
>
> (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—
>
> (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
>
> (b) Safeguarding the life-supporting capacity of air, water, soil and ecosystems; and
>
> (c) Avoiding, remedying or mitigating any adverse effects of activities on the environment.

390. The proposal provides for the use and development of the site in a way that enables the applicant and future owners and occupiers to provide for their wellbeing, without detracting from the wellbeing of the wider community or detracting from the matters listed in s5(2)(a) – (c).

391. Whether Part 2 of the RMA (in terms of the FTAA2024) is being met also involves an assessment informed by reference to the matters set out in sections 6 and 7 of the RMA.

392. Section 6 sets out matters of national importance – none of which are offended by this application, noting that the proposal:

- does not affect the coastal environment;
- does not affect any outstanding natural features and landscapes;
- does not affect any areas of significant indigenous vegetation or significant habitats of indigenous fauna;
- does not affect public access to and along the coastal marine area, lakes, and rivers;
- recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga, as described earlier in this assessment and with reference to the IMP, subdivision and development guidelines, and the consultation undertaken;
- does not affect historic heritage;
- does not affect protected customary rights;
- is not subject to any significant risks from natural hazards (and otherwise recognises and provides for natural hazard risks).

393. Section 7 requires particular regard to be had to ‘other matters.’ Of relevance to this application, the proposal:

- Has had particular regard to kaitiakitanga and the ethic of stewardship as demonstrated through consultation with rūnanga (Appendix 29 and Appendix 30) and the corresponding assessment of cultural effects (subsection (aa));

- Represents an efficient use and development of (finite) natural and physical resources, namely the land resource, accounting for the assessment of economic costs and benefits in **Appendix 20** (subsection (g));

- Supports the maintenance and enhancement of amenity values and the quality of the environment, as demonstrated in the assessments of landscape, visual amenity and urban design effects in **Appendix 11** and **Appendix 23** (subsection (f));

- Has had particular regard to, and managed the intrinsic values of ecosystems per the ecological assessments in **Appendix 7, Appendix 8, and Appendix 9** (subsection (d)); and

- Has had particular regard to the efficiency of the end use of energy, the effects of climate change and the benefits to be derived from the use and development of renewable energy as demonstrated by the greenhouse gas emissions assessment in **Appendix 25** (subsections (ba),(i) and (j)**.**

394. Overall, the proposal is consistent with the requirements of Part 2 (i.e. sections 5, 6 and 7), and therefore, it is considered that the purpose of the RMA would be better achieved by the granting of consent.

Conclusion

395. This application must be considered in light of the purpose of Act which is to "*facilitate the delivery of infrastructure and development projects with significant regional or national benefits*". The 'regional or national benefits' are the primary consideration in deciding whether to grant approval to a substantive application.

396. As detailed above, the Ryans Road Industrial Development project will deliver significant regional economic benefits including driving regional economic growth, creating employment opportunities and increasing commercial activity. The project will address shortfalls in industrial and logistics development capacity in the vicinity of the airport, and Christchurch generally, and has been assessed by the economic experts to:

- Generate a one-off construction effect of $574 million in GDP for the Christchurch economy, spread across multiple construction seasons and supporting 2,205 full-time equivalent jobs; and

- Once fully occupied, have a sustained operational contribution of $330 million in GDP annually to the Christchurch and Canterbury economies, creating and maintaining 2,770 full-time equivalent jobs. This ongoing economic activity will support employment opportunities across retail, commercial, and service sectors, sustain local businesses and strengthen regional economic resilience.

397. With regards to adverse impacts, for the purpose of s85(3) of the Act, the above assessment, informed by relevant experts, demonstrates that the proposal will:

- Have no more than **minor** and **acceptable** actual or potential adverse effects on the environment; and

- Be generally **consistent** with the applicable statutory and non-statutory planning instruments and provisions in an overall sense.

398. Accordingly, there are no adverse impacts that reach the threshold of a "sufficiently significant adverse impact" such that they need to be taken into account in terms of an assessment under s 85 of the FTAA2024.

399. Overall, taking into account the purpose of the Act as the primary consideration, this assessment concludes that there is no basis to decline the approvals sought in this application.

This AEE has been prepared by Jeremy Phillips and Clare Dale of Novo Group Limited. Their relevant qualifications and experience is outlined in **Appendix 36**.

Appendix 1: Applicants/ Authorised Persons' Statement

Appendix 2: Certificate of Title

Appendix 3: Capture Scheme Plans

Appendix 4: Acoustic Assessment

Appendix 5: Geotechnical Assessment

Appendix 6: Detailed Site Investigation

Appendix 7: Lizard Habitat Assessment and Lizard Management Plan

Appendix 8: Wetlands and Waterways Assessment

Appendix 9: Avifauna Assessment

Appendix 10: Integrated Transport Assessment

Appendix 11: Landscape and Visual Impact Assessment

Appendix 12: Three Water Servicing Report

Appendix 13: Stormwater Management Technical Assessment

Appendix 14: Infrastructure Report

Appendix 15: Lighting Assessment

Appendix 16: Earthworks Management Plan

Appendix 17: Construction Management Plan

Appendix 18: Proposed Consent Conditions

Appendix 19: District & Regional Plan Compliance Assessment

Appendix 20: Economic Assessment

Appendix 21: Industrial Land Market Assessment

Appendix 22: Industrial Land Demand Assessment

Appendix 23: Urban Design Assessment

Appendix 24: Consultation Documents & Records

Appendix 25: Green House Gas Emissions Assessment

Appendix 26: Highly Productive Land and Soils Assessment

Appendix 27: Water Quality Technical Assessment

Appendix 28: Assessment of Ngāi Tahu subdivision and development guidelines

Appendix 29: Consultation Feedback Ngāi Tūāhuriri

Appendix 30: Consultation Feedback Te Taumutu

Appendix 31: Flood Hazard Assessment

Appendix 32: Assessment of Planning Provisions

Appendix 33: S30(3) Notice

Appendix 34: S30(3) Notice

Appendix 35: Contact Details of Adjacent owners and occupiers.

Appendix 36: Statement of Experience

Appendix 37: Legal Advice on NPS - HPL - Chapman Tripp

Appendix 38 – Lizard Surveys – PDP