

1. **This is a politically motivated route designation & Fast Track application which is not fit for purpose on any level. The exorbitantly high Project construction cost especially the 7 km stretch of new motorway Route from Pineacres to the middle of Woodend.** The existing route is shorter and currently traffic is diverted away from Kaiapoi. Tolls will bring traffic back through the historic Kaiapoi township. The start of the early works bringing 150 truck and trailer loads a day of river gravel and grade 5 clean fill (200,000m3 from Boffa Miskell report) to dump into the quarry lakes to form a causeway across will also bring traffic congestion to local roads, Kaiapoi and Woodend townships. Canterbury need bridges as its population has moved inland. These inland towns need connecting bridges & roads. Connect Hammer to Rangiora (by passing Amberley) to West of the airport to Rollerton via a new bridge west of the airport. No need for motorists to go anywhere near Woodend.
2. This would make the Woodend By Pass not necessary but this was never considered as it wasn't in the brief. Populations have moved inland and with about 60km between the Waimakariri Gorge Bridge and the Motorway bridge mean travel options are extremely limited.

3. **New inland bridges would provide quicker travel times, more route options, connecting many townships to the airport. Provide Route Resilience and give more options especially in flooding, earthquake and tidal wave events.**
4. ***This Project will have not have significant regional and national benefits. Constructing even the causeway in the early works will cause major adverse effects and impacts travel on local roads & bridges which are not up to standard. This motorway could take over ten years to build, creating traffic jams and direct traffic through a Kaiapoi. Will need a by pass to by pass the construction work. It will create a negative effect on economy. 150 truck loads of gravel a day just to build a causeway. Tolling will increase traffic jams through Kaiapoi and neighbouring roads as well. Other cheaper route options like new bridges would Benefit the economy, by improving travel times and reliability for freight and commercial vehicles instantly. New bridges would take a much shorter & cheaper construction time with an instant bang for your buck.**
5. ***Traffic Design group original hearing submission for a roundabout option for Pineacres was not considered. The panel brief was to provide motorway standard design only . It was not in the brief for the panel to consider alternatives even if they were cheaper and more practical.**
6. **The Woodend By Pass Route Designation is a bit like a paper road. It's on the map but lacking in detail. NZ has lots of paper roads which will never been built as they are too costly and over unsuitable ground, just like the Woodend By Pass which has 103 condition and triggered a large number of other resource consent conditions, and other requirements which have not been met. WDC thinks NZTA and ECAN & WDC are in charge of processing these Route Designation Conditions. Ecan thinks its just WDC. EPA said it was WDC & ECAN. Who is in charge of consenting these conditions. Surely not NZTA?**
 Yet the fast track application is wanting to remove the very limited number of conditions to build this motorway. Is this legal? Please refer to my letter to Simeon Brown & his reply, saying the 103 Route Designation conditions do not disappear under the fast track process.
7. **The Woodend By Pass Route Designation was the first test case of broad brush consent, leaving all detailed design and consents to the design phase. It was designed to protect the route from future development. This has not happened.**
8. ***The North End Sand Shingle Pits have been allowed to continue mining enormous areas of the Woodend By Pass Route designation north of Pineacres. The route designation now form a large part of the 5 hectare and 7 hectare freshwater quarry lake up to 10m deep. The under ground fresh water river system is now exposed. It flows from West to East and pops up as springs out to sea. At the hearings the route was altered with a slight curve to miss the lake as it was in 2014. But the sand mining is highly sought after for making concrete and the Christchurch rebuilt after earthquakes. Now there is a significant landscape of a massive body of fresh water supporting and ecosystem rich in biodiversity including at risk native birds and endangered eel. Yet they NZTA plans posted on their website fails to show the motorway going straight through these quarry lakes. The public are not aware**

they are even fresh water lakes here. The Waimakariri Sailing club has been using them for a few years and it's a great loss to the sport of sailing. Quarry lakes have the potential to be a Regional and National Water Sports Park venue for future generations. For example Sailing, Paddle boarding, rowing, waka ama, Kayaking, water skiing, dragon boating, swimming, triathlon, Ironman, scuba diving.

9. Canterbury is lacking fresh water venue a venue of this size. These are the largest quarry Lakes in North Canterbury. Imagine a regional park boosted by native planting to encourage more endangered birds like the black stilts by creating some shallow wading habitat. They are in the area. These quarry lakes already support significant Raupo Beds, where the local Bitten could be nesting.
10. Eels are plentiful and commercial Eel farming trial resource consent was granted in the neighbouring Kaiapoi Lakes before the council dump toxic waste directly into the water. These quarry lakes are special, the water is flowing, by allowing 200,000 m³ dumping of grade 5 cleanfill into this fresh water will cause major environmental impacts. Ecan has given consent for this dumping only for the purpose of building a causeway for the motorway, with dumping excepting to start any day now. Yet the fast track application is yet to be heard.
11. **Please refer to "Groundwater out of sight but not out of trouble"** NZ Herald 20 April 2025 by Helen Rutter (Senior adjunct lecturer, Waterways Centre, Canterbury Uni. Below are key points which effect this project & human health
Groundwater is the core source of water for agriculture
 - Provides drinking water to nearly ½ the population
 - During dry periods it maintains the flow of rivers by slowly releasing water stored in aquifers
 - Groundwater acts as a sink & pathway for contaminants entering ground water
 - Problems with Nitrate levels in ground water
 - Can have harmful levels of bacteria such as E. coli
 - Ground water lag time between contaminating ground water and entering drinking water supply
 - Gap in knowledge of ground water research
 - As sea level rises and other climate change impacts can also bring salt water into coastal aquifers making ground water less suitable to use while affecting underground asset such as pipes less suitable to use.
 - As sea level rises ground water levels are likely to be pushed higher, both near the coast and further inland. This raises the risk of flooding, liquefaction and damage to infrastructures. (As a landowner, we are already seeing these effects in these coastal water ways & wetlands)
12. **The Woodend By Pass being the first of the test case board brush consent means level of detail presented to the panel was very limited, using out dated maps, and data even though just after the earthquakes this info had not made it into the council maps and NZTA would not be able to get away with this now.**

13. ***I do not think this application Complies with completeness requirements in sections 42, 43 and 44 of the FTAA; and c Relates solely to the listed Project.**
14. *WDC now has a set of hazard maps for Flood Zone, Liquefaction, Tsunami maps which the Woodend By Pass cut through all of these hazards maps. Climate and nature.org.nz also has produced case study maps for Kaiapoi Sea Level Rise which shows most the of the coastal land from the Waimakariri to the Ashley River underwater completely including the Woodend By Pass. The Bath tub effect with out a plug!.
15. The 11 quarry lakes between Kaiapoi and Wooden have also disappeared in the bath tub effect . Also states that the coastal sand dunes stopped expanding in 1992 and are now eroding Yet all this updated information means this project is not fit for purpose. How would you get insurance!
16. ***The WDC & ECAN & GOVT should looking at their hazard maps and Climate change maps as well as sewage pipeline location (located in a salt marsh which is sinking and in a liquefaction soupy ground) before Unlock housing and urban development at Woodend, Ravenswood and Pegasus townships; Also the sewage pipeline & current sewage ponds etc is a danger to human health which is contaminating sea water & river systems.**
17. Please refer to: "This is the climate fight that we've avoided Article in Sunday Star Times April 2026"

"Resilience is not a slogan, it's a set of decisions"
18. *It's impossible to assess environmental effects if there has been not physical surveys carried out of effected lands and ecosystems. How can anyone assess info which is not provided and when there are no construction details or plans. The public have only seen info release by NZTA which is not much! No idea of costs as there are no construction details. Pretty hard to estimate specially building on unstable low lying ground with a high water table, in liquefaction zones and with lateral spread issues, building through a quarry lake and a Gladstone road rubbish dump rise plenty of red flags! Plus in a fuel crisis with daily rising costs.
19. ***This project, the designation land, neighbouring land and receiving environment form the construction phase to motorway drainage and contaminated water run of has major significant impact the coastal environment and significant natural areas, and outstanding natural features or landscapes²²**

20. *** Overall, this project has major significant adverse effects, that no amount of mitigation, and offsetting and compensation can fix. Offsetting and compensation do not address effects on wetlands, streams and lizard habitat or Gecko habitat, White bait breeding and living habitat, Mudfish breeding habitat, Bitten Raupo Breeding and feeding habitat, endangered eels habitat and other native at risk native bird species such as the spoonbill, White heron and Crested Grebe etc. All waterways are connected above and below ground, way beyond land disturbed by construction phase operation.** Ground water contamination from dumping grade 5 Clean fill (ECAN consent) will contaminate drinking water (Threat to human health) as there are many bores, wells, Kaiapoi's drinking water coming from aquifers below ground.
21. Since the earthquakes the coastal land has dropped and the ground water depth has risen and in some places is under 1 meter below the ground. (Results from the NZTA testing) This means excavating to route and access roads neighbouring the designation will strike ground water often. (note ECAN consent for haulage road early works said rare event of striking ground water) This whole designation is very watery being very low lying which the coastal land is continuing to drop, causing huge drainage problems with a receiving environment of little fall and very poor drainage. Please note this sand packed down like concrete and water does not drain away.
22. McIntosh's Drain outlet is below the River and is controlled by a flood gate. It cannot cope with more water.
23. ***Recent flooding of the McIntosh's Drain Catchment has seen water up to the top of the banks, and tend to have no flow because the catchment is flat. McIntosh's drain was not assessed in original application because NZTA considered it to be dry. This is definitely not the case now. The upper reaches of this catchment are naturally (not what Boffa's Miskell evident says) and will be cut in half by the motorway. The tidal toe of the McIntosh's drain is moving inland with the increasing salt meaning whitebait breeding habit is moving inland too. Motorways generates a lot of contaminated water runoff how will this effect the significant native habitat in the McIntosh's drain which supports Bitten, whitebait, eels & mud fish breeding habitat.**
24. ***The whole coastal area between the Waimakariiri River and the Ashley River is special and is highly cultural significant and well as containing may Significant Natural Area. This land has changed drastically since the earthquakes with ever increasing water has created huge areas of wetter habitat and increasing biodiversity. This coastal land will be significantly adversely effected by the new motorway as it is a biodiversity hotspot. The native birds also use all of the 11 man made quarry lakes between Kaiapoi and Woodend. These are special and significant landscape features brimming with biodiversity and native birds species many of them rare and endangered. This water habitat nearby is not mentioned in NZTA application.**

25. *Last week a pair of rare Gecko's have now been found land on the corner of Lees Road and Barkers Road, what will happened to this habitat owned by NZTA. A haulage road is planned here, along this rare dune habitat system which is home to lizards as well. Surely all land impacted by the project must be assessed for damage and loss of habitat.
26. *This unaltered coastal dune and wetland system between Waimakariri and Ashley River Systems is rare, its wild, its unpopulated, and worth protecting for future generations. For 400 years this was the home to the largest South Island Maori population and this entire section of land is of cultural and historic important with Black Maps and Silent files linked to property titles marking scared site. It's steep in history with the siege & sacking of the Kaiapoi Pa (Kaiapohia Pa) & surrounding area during the 1831 -1832 musket wars. This was a scale similarly compared to the loss of life at Gallipoli. The Woodend Pass is completely within this highly significant cultural historic area. This should be reason enough to move the route inland. NZ should be doing more to protect its history.
27. *Today the traditional food basket is returning as the water levels are continuing to rise with increase storms in the mountains which recharge the coastal lowlands underground river systems, creating more wet habitat. A salt marsh is quickly expanding with the rise in the water table. It is now a significant landscape feature and how will all these new & existing wetlands and waterways be effected now and in the future by the motorway?
28. **Resource Consent conditions disappear? Quarry Lakes, off Lees Road, Pineacres along Barkers Road.** What happens to the Christchurch Ready Mix Concrete Resource consents for the quarry lakes which have now changed ownership to NZTA and ceased operation. Please refer to ECAN consents C06C/03379, CR093754 & any new consents to extract aggregate above and below ground water level. Please refer to the consent conditions and Landscape Remediated Plan
Please note hours of operation 7 am to 5 pm. No work on Sundays or Public Holidays
No Plants or machinery shall alter or contact exposed ground water other than direct use to excavate aggregate material, all machinery or plants contacting groundwater in accordance with Condition)18) (a) shall be cleaned and free of contaminants or plant material.
To prevent the spread of Didymo or any other aquatic pest, the consent holder shall ensure activities authorised by this consent are undertaken in accordance with the Biosecurity New Zealand 's hygiene procedures.

On completion of works the site shall be remediated in accordance with the supplied Landscape Plan CRC093754C

No excavation shall occur within 10m of the site boundary
No dewatering of the site shall occur at any time.

So with NZTA now owning the site what has happened to these Resource consent conditions set to protect the receiving environment and neighbours from adverse effects.

29. Pest note there is pest fish used for fishing competitions in these landlocked lakes which must not escape into wetlands and water way systems. Potential environmental nightmare with pest fish eating native fish.
30. Instead of a lovely landscape native habitat of pure water NZTA is proposing a Grade 5 clean fill site for the sole purpose of construction a base for the motorway to go on top. Other words a mega dump causing contamination of surface and groundwater with huge environmental impact. Loss of freshwater habitat native plant habitat, sedimentation, filling lakes causing significant loss of water species and bird life. Dynamic compaction effects have not been assessed but raise extreme issue to water table, where will the fresh water go? Ground water pollution, neighbouring land deformation due to the pro longed vibration to properties along Barkers Road, Lees Road, Pineacres.
31. The commencement of the early roadworks at Williams street to enable trucks to start dumping fill into the quarry lakes is ready to commence even though all of the route designation conditions have not been met. Is this legal? These early works are already causing many issues with truck movements, lights, visual issues as there is no screening of any adverse effects, visual, noise, vibration, dust, trucks unload, rollers working, constant hum and rumble, add dumping noise into lake, etc etc. These works can be seen & heard from the house at 230 Lees Road.

32. If this project get approval, here are a set of conditions.

1. Hours of operation to be the same as the Ready Mix consent
7am to 5pm. Not work Sunday or Public holidays
2. The quarry lakes to have a bund planted in natives species as per ready mix resource consent. To screen adverse effects of the early works and building a causeway through the lakes for the motorway to be built on top of. The effects of dynamic compaction on causeway fill, and motorway construction. Bund to be installed before any filling in of the quarry lakes.
3. No contaminants to be dumped into the quarry lakes. Please refer to the Ready Mix resource consent conditions and add them to the Project.
4. The quarry lakes to be landscape with native planting and shallow wading areas & habitat formed to attract the Pied Stilts and Black Stilts back to the area as the Pied stilts nested in the Lees Road sandhills when the quarry lakes were first dug. Plant Raupo to encourage more Bitten Breeding Habitat
5. Create a regional park with the Lees Road and Barkers Road properties now owned by NZTA. Add a running and walking, biking, horse riding trails to connect Lees Road to Woodend Beach Planting to be all native species, and perhaps a doc headquarters with native plant nursery, café, shop. No dogs allowed.

6. Create a museum of Local history like Treaty of Waitangi Grounds (South Version telling local stories Island version).
7. Only the land for the causeway filled in on the designation used for causeway fill.
8. No dynamic compaction as the effects on ground water, contamination and neighbouring land and wildlife, humans health has not been assessed for adverse effects and no information of reducing these serve adverse effects
9. Carry out a cost analysis of cheaper more practical solutions with less adverse effects like roundabout options especially at Pineacres, and two lanes for existing road between Pineacres and Woodend.
10. No construction of infrastructure during the whitebait breeding season in the tidal river and wetland systems.
11. Reduce and delete all culverts where possible to ensure fish passage. Construct bridges instead to preserve natural catchment areas.
12. Gift \$100,000 to Conservation Volunteers NZ to carry out conservation work in the local area effected by the motorway
13. Gift \$100,000 to &Trees for Survival Charity for Canterbury (School students grow plants at school in growing units and then plant up waterways, wetland etc
14. Pay to Remove Willows & woody weeds from all the wetlands, streams, rivers, lakes, waterways effected by this project and & replace with suitable native planting, maintain plantings to restore biodiversity lost.

Attachments send shortly

1. Ready Mix consent conditions
2. Read Mix Landscape Plan CRC093754B
3. This is the Climate fight that we've avoided by Luke Malpass
4. Ground Water out of site but not out of trouble
5. Sea Level rise modelling for Kaiapoi Case study
"Bath tub"(Climateandnature.org.nz)
6. From Willow to whitebait
7. Kaiapoi regeneration evokes centuries-old wetland complex (Press Article)
8. Letter to Simeon Brown MP and his reply.