



Waimakariri District Council's comments on a Substantive Application Fast-Track Approvals Act 2024

Fast Track Application FTAA-2512-1157 The State Highway 1 North Canterbury—Woodend Bypass Project (Belfast to Pegasus)

Our Reference: RC255399, Trim number 260410093396

Date: 04 May 2026

To: Rob van Voorthuysen
Woodend Bypass Project Expert Panel Chair

From: Waimakariri District Council

Fast-track project: FTAA-2512-1157 The State Highway 1 North Canterbury-Woodend Bypass Project (Belfast to Pegasus).

Thank you for your invitation to provide written comments on the substantive application ("The application") for the State Highway 1 North Canterbury-Woodend Bypass Project (Belfast to Pegasus) under the Fast Track Approvals Act 2024. The following comments are provided pursuant to section 53(2) of Fast Track Approvals Act 2024 (FTAA). The purpose of these comments is to assist the Panel in their decision-making process under the Act. Please see below for Waimakariri District Council's (WDC) comments on this application.

1. PREAMBLE

- 1.1 My name is Nirosha Seelaratne and I am employed as a Senior Resource Management Planner for Waimakariri District Council, where I have worked since June 2021. I hold the qualifications of Bachelor of Science in Real Estate Management and Valuation from University of Sri Jayewardenepura Sri Lanka and a Master of Resource Management Environmental Planning from Massey University. I have 8 years of experience working in New Zealand as a Resource Management Planner.
- 1.2 This report has Eight (8) appendices. The Technical memos have been prepared with advice from the Council staff and external consultants detailed in Table 1 below. Copies of the Technical expert memos are attached in the appendices.

Table 1

Appendix	Details	Author	Position
1	2015 Commissioners Recommendations	Darryl Miller, Andy Carr and Peter Allan	Hearing Commissioners
2	Alterations to Designation Conditions (with track changes)	Nirosha Seelaratne	Senior Resource Management Planner
3	Landscaping	Jade McFarlene	Registered Landscape Architect and Urban Designer
4	Noise and Vibration	Luke Lee	WDC Senior Environmental Compliance officer
5	Terrestrial Ecology	Hazel Holmes Dr Bex Dollery	WDC Ecologist WDC Biodiversity Team Leader
6	Traffic Management	Shane Binder	WDC Senior Transportation Engineer
7	Contaminated Land	Dr Hana Christenson	Senior scientist in the contaminated land and waste team, Canterbury Regional Council (ECAN)
8	Contaminated Land Proposed conditions	Dr Hana Christenson	Senior scientist in the contaminated land and waste team, Canterbury Regional Council.

2. BACKGROUND AND CONTEXT

2.1 The Partially Operative Waimakariri District Plan (Appeals Version) (PODP) includes the designation “Woodend Bypass (NZTA3)”, which authorises the construction, maintenance, operation, use, and improvement of the Woodend Bypass and its associated infrastructure. The designation is currently operative under the PODP and is subject to 103 conditions and five advice notes.

2.2 Information in the PODP about the designation can be viewed [here](#)

2.3 An Outline Plan was submitted to Waimakariri District Council (WDC) in August 2025 to authorise the following early works associated with the Woodend Bypass:

- a) Kaiapoi Bridge Strengthening
- b) Quarry Lakes Partial reclamation.

2.4 At the time of preparing this response, the early works have been authorised via the Outline Plan process and are well underway (WDC reference RC255072). As a result, those works fall outside the scope of the substantive application, as identified in the substantive application.

- 2.5 WDC interests in the substantive application are that the application seeks approvals for:
- a) A resource consent that would otherwise be applied for under the RMA, in relation to the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011.
 - b) Alterations to the existing designation for which a Notice of Requirement would otherwise be lodged under the RMA.
- 2.6 This report provides WDC's comments on the proposal and is supported by the information in Appendices 1-8.

3. KEY ISSUES

- 3.1 WDC supports use of the Fast-track Approvals Act for this project.
- 3.2 The Bypass route passes through a number of Ngā whenua tapu o ngā iwi - Sites and Areas of Significance to Māori and also several silent file areas. Te Ngāi Tūāhuriri Rūnanga hold mana whenua status over the area within the district. WDC encourages effective consultation with Ngāi Tūāhuriri.
- 3.3 WDC highlights that matters relating to drainage and stormwater management will need to be appropriately addressed, to ensure there is no increase in effects from stormwater runoff and/or flooding on nearby properties. Connectivity with the surrounding business environments will also need to be carefully considered, particularly in light of the proposed changes to the Pegasus interchange, to support efficient, safe, and well-integrated transport and access outcomes so there is no negative impact on existing businesses, especially at Ravenswood.
- 3.4 The Construction Support Area (CSA) will be located directly opposite residential properties on Lees Road, Kaiapoi. There will be effects on these properties during the construction phase. It is important that, at the end of the project, the CSA is appropriately reinstated with consideration of footpaths.
- 3.5 Prior to lodgement of the application and during the application process to date, WDC has been working closely with NZTA through regular meetings and exchange of technical reports and other information. This collaborative relationship has enabled the majority of WDC's issues to be addressed and resolved. WDC has identified the following key areas as requiring further consideration:
- I. Alterations and removal of conditions on the Designation
 - II. Matters identified in the following Technical Memos (including further information requirements and additions/changes to conditions excluding those addressed identified under I. above):
 - a) Landscaping (Appendix 3)
 - b) Noise and Vibration (Appendix 4)
 - c) Terrestrial Ecology (Appendix 5)
 - d) Traffic and transportation (Appendix 6)
 - e) Contaminated land (Appendix 7)

3.6 These are discussed in detail below.

Alterations and removal of conditions on the Designation

Removal of the Management Plan Certification process

3.7 The application proposes alteration of Conditions 4, 7, 8, 9, 11 and 34 to remove the Management Plan Certification requirements for the following Management Plans:

- i. Construction, Environmental and Social Management Plan (Conditions 4, 7 and 8)
- ii. Urban and Landscape Design Management Plan (Conditions 4 and 34)
- iii. Traffic Management Plan (Conditions 4 and 9)
- iv. Construction Noise and Vibration Management Plan (Conditions 8 and 11)

3.8 The application proposes removing the WDC Management Plan certification process, while retaining a certification requirement for Management Plans submitted to ECAN, HNZPT, and DOC. The application also indicates that the proposed amendments were based on the following key considerations:

- a. the Project is subject to a comprehensive Outline Plan process, and for efficiency NZTA now proposes to submit the Management Plans with the Outline Plan.
- b. Under section 176A of the RMA, WDC may use the Outline Plan process to request changes to the Management Plans. NZTA may then make the changes, or if they choose not to, WDC may appeal the matter to the Environment Court.

3.9 However, WDC considers a separate certification process of the Management Plans would provide a more robust process as was intended by the Commissioner's recommendation on the Notice of Requirement (NoR) dated 5 June 2015 (attached as Appendix 1) which outlines a number of matters relevant to Management Plans and certification. The Commissioner's recommendation noted that the detailed design was not available and therefore:

"... the NZTA will rely extensively on the use of the Outline Plan process and Management Plans as mechanisms to ensure environmental effects are appropriately managed and to provide a framework for the future consideration of resource consent applications. Again, we signal comfort with this approach in principle. One of the critical issues for our determination will be to ensure that the management plan approach and content outlined in the evidence of the NZTA witnesses is sufficiently robust so as to:

- Address the relevant effects; and*
- Require certification and/or auditing where appropriate."*

(Paragraph 223, page 40 of the Commissioner's recommendation on the NoR)

3.10 Other relevant passages from the Commissioner's recommendation on the NoR include:

"The proposed ULDMP [Urban and Landscape Design Management Plan] and VEMP [Visual Effects Management Plan] are key documents. The ULDMP must be lodged prior to the Outline Plan and must be certified by the Council. The certification process, including dispute resolution processes are outlined in proposed conditions 4-6. The VEMP is to be considered as part of the Outline Plan, and we have already highlighted above

our view on that process.” (Paragraph 240, page 41)

“There are a considerable number of conditions proposed by the NZTA and this is a reflection of the current status of the project and the level of the information available. As we have already stated, we accept the approach given the “future proofing” nature of this proposal. We add, however, that in our view the future proofing concept extends not only to the ability of the NZTA to secure this route, but also to ensuring appropriate environmental outcomes for the directly affected landowners and occupiers. To this end there is a significant reliance on the use of future management plan, certification and Outline Plan processes. While the lack of project specificity was clearly a concern to some submitters, it is unfortunately, and at the same time realistically, a reflection of the project. It is for that reason that we have paid particular attention to the conditions package through the hearing and during our deliberations.” (Paragraph 273 Page 47)

- 3.11 Similar to the NoR, the substantive application does not include the detailed design or Management Plans and states that:

“.... the Project has been developed to a 30% design level and with an indicative construction methodology, meaning the assessments have been undertaken on a conservative basis to allow flexibility for future refinement of both the design and construction approach.”

(Substantive Application report, paragraph 6.6.1 page 73)

- 3.12 As the detailed design has not yet been developed, the substantive application has similar characteristics to the Notice of Requirement considered in the 2015 Commissioners’ recommendation. WDC considers that the Certification process provides the necessary scope to review and require amendments to Management Plans beyond what is available through the Outline Plan process alone.
- 3.13 WDC considers the ability to make changes to Management Plans through certification is a more robust process in the absence of detailed information such as draft Management Plans, and deletion of Conditions 5 and 6 would also remove the useful dispute resolution process.
- 3.14 It is noted that the Outline Plan process and Management Plan certification could be undertaken concurrently to streamline the processes and avoid delays.

Removal of Construction Air Quality Management Plan - Condition 10

- 3.15 The application indicates the reason for removing this condition is that this matter will be covered under the Regional Council consents and to avoid the potential for duplication and inconsistencies across the implementation of the designation and resource consents.
- 3.16 However, some aspects of this condition are not explicitly covered in the proposed Regional Council consent to discharge dust in to air e.g. dust generation from haul routes, construction yards and construction sites.
- 3.17 In the absence of the full condition, the effects associated with the matters outlined in paragraph 3.15 above may not be adequately addressed, monitored, or mitigated. Given

that dust can cause significant effects on residents and adjoining property owners, WDC considers it necessary to amend the condition to ensure it fully captures and gives effect to the intent of the original condition.

3.18 Discussions with the Regional Council indicated their support for this approach.

3.19 Proposed changes are included in the tracked changes in Appendix 2.

Removal of Monitoring Conditions 100-103

3.20 The application proposes that monitoring conditions 100-103 are deleted. WDC will have some monitoring responsibilities and opposes deletion of these conditions.

3.21 WDC will have a role in monitoring compliance in relation to:

- a. Construction noise and vibration
- b. Operational noise and vibration
- c. Construction stage traffic and transport
- d. Landscaping, including Conditions 39A and 39B which reference specific private properties and mitigation measures.

3.22 Other organisations will also have monitoring responsibilities. WDC supports monitoring conditions which clearly set out which organisations have responsibility for monitoring different effects and avoids overlapping responsibilities.

3.23 As part of recent consultation, NZTA has indicated agreement to a separate monitoring condition. The following condition is therefore proposed, and has been included as a new condition in the tracked changes version of the conditions attached as appendix 2

The Council, on an actual cost basis, will audit compliance with the conditions of consent by both site inspections and checking of associated documentation to the extent necessary to ensure the work is completed in accordance with the approved plans and specifications and to the Council's standards, relevant to the following matters:

- a) *Construction Traffic Management*
- b) *Construction Noise and Vibration*
- c) *Urban and landscape design*
- d) *Visual Effects*

3.24 The following additional condition is also requested:

Compliance with the above conditions may be verified by inspection by a District Council Officer pursuant to Section 35(2)(d) of the RMA. Should an inspection be required the Requiring Authority shall pay to the District Council charges pursuant to Section 36(1)(c) of the Resource Management Act 1991 to enable the District Council to recover its actual and reasonable costs in carrying out the inspections.

Matters identified in Technical Memos

Landscaping (Appendix 3)

- 3.25 The information provided to date to support the assessment of landscaping effects at the Pegasus Interchange is limited and does not fully demonstrate how potential adverse visual and landscape effects will be mitigated. However, amendments to strengthen conditions 39A and 40, together with the certification process of the Management Plans, will provide a sufficient framework to ensure appropriate landscaping outcomes are achieved and effective mitigation is delivered.
- 3.26 Landscaping requirements for Lees Road Construction Support Area (CSA) can be sufficiently addressed by strengthened condition 39B.
- 3.27 Landscaping proposed for the southern remnant lake /ecological offset landscape (new wetland area) can also be addressed through a Management Plan certification process acknowledging ECAN and DoC (Department of Conservation) processes will address the creation and maintenance of the wetland.

Noise and Vibration (Appendix 4)

- 3.28 The retention of the Compliance Monitoring and cost recovery requirements has been outlined in the relevant technical memo. These matters have been discussed in paragraphs 3.11 to 3.15 above.

Terrestrial Ecology (Appendix 5)

- 3.29 WDC ecologists have identified that the following additional information is required to fully assess the operational impacts arising from the proposed wetland enhancement close to the bypass:
- Further assessment is needed to fully understand the operational, mitigation and compensation relating to bird strike risk associated with the proposed wetlands.
 - Proposed mitigation to guide birds away from the highway when moving between the two areas of habitat.
 - Ecological Management Plan shall include deterrents for bird strike and operational effects, and monitoring protocols and schedules with defined objectives.
 - Vegetation details of the proposed mitigation.

Traffic and transportation (Appendix 6)

- 3.30 WDC's Senior Traffic engineer emphasised the importance of retaining the Management Plan certification process.
- 3.31 Minor changes are also recommended to Conditions 8(i), 9(a), 39, 98 and 99. These are incorporated into the tracked changes in Appendix 2

Contaminated land (Appendix 7)

- 3.32 A number of amendments are proposed to the conditions relating to contaminated land. These are shown as tracked changes to conditions in Appendix 8.

4. CONDITIONS / CHANGES SOUGHT TO ADDRESS WDC COMMENTS

- 4.1 Further information is required in several key areas and amendments to conditions are requested to enable full assessment of the application and to mitigate the effects.
- 4.2 The most significant information gaps relate to landscaping and terrestrial ecological matters.
- 4.3 Amendments to relevant conditions are proposed in respect of capturing the information gaps in landscape design within the Pegasus Interchange area in particular. Ecological information addressing potential operational and safety impacts associated with the risk of bird strike on birds crossing the Bypass between the quarry lakes and proposed wetland located on either side of the new road will be required.
- 4.4 In terms of amendments to designation conditions, there are three main outcomes requested:
- i. Retention of the Management Plan Certification process, and
 - ii. Retention of separate monitoring conditions which clearly set out the areas of responsibility for WDC and other organisations.
 - iii. Retention of an amended condition 10 to address dust management.
- 4.5 Amendments are also proposed to the contaminated land related conditions.
- 4.6 Appendix 2 (Designation Conditions) and Appendix 8 (Contaminated Land Conditions) outline the proposed amendments/ additions which address the matters outlined in this report.

5. CONCLUSIONS

- 5.1 WDC has undertaken a review of the State Highway 1 North Canterbury-Woodend Bypass Project (Belfast to Pegasus) Substantive Application lodged with the Environmental Protection Agency (EPA) on 19 December 2025. This document summarises the key outstanding issues, additional information requirements and proposed variations/ additions to the Designation Conditions and Contaminated Land conditions.

Prepared By	 Nirosha Seelaratne Senior Resource Management Planner Date: 29 April 2026
Reviewed By	 Wendy Harris Planning Manager Date: 4 May 2026
Signed By	 Kelly LaValley General Manager Planning, Regulation and Environment Date: 4 May 2026