Recommendation of the Environmental Protection Authority

To the Hon Amy Adams, Minister for the Environment

1. The Environmental Protection Authority (EPA) recommends, under section 146 of the Resource Management Act 1991 (RMA), that you make the following direction on a proposal lodged with the EPA by the New Zealand Transport Agency (NZTA), comprising of three notices of requirement and 15 resource consent applications ("the matters") relating to the construction, operation and maintenance of the Christchurch Southern Motorway Stage 2 and Main South Road Four Lanning proposal ("the proposal"):

(a) **Note** our advice that the matters lodged by NZTA are a proposal of national significance; and

(b) **Note** our advice that the matters lodged by NZTA should be referred to a board of inquiry; and

(c) **Agree** that the matters lodged by NZTA are a proposal of national significance; and

(d) **Direct** that these matters be referred to a board of inquiry for decision, under section 147(1)(a) of the RMA, for the reasons set out in this advice.

Sarah Gardner
General Manager
Applications and Assessment
Environmental Protection Authority
EPA Advice

Executive Summary

2. This paper provides you with our recommendation on NZTA’s Christchurch Southern Motorway proposal in accordance with section 146 of the RMA.

3. You are required to make a decision as to whether the matters are a proposal of national significance, and where to direct this proposal for consideration.

4. Section 147(3) requires that you must apply section 142(3) in deciding whether a matter is, or is part of, a proposal of national significance. You may have regard to any relevant factor under section 142(3)(a), and any advice we provide under section 142(3)(b).

5. In accordance with section 147(4), in deciding where to direct this proposal for consideration, you must have regard to the views of the applicant and the local authority, the capacity of the local authority to process the matter and our recommendations.

6. In summary, the applicant, Christchurch City and Selwyn District Councils are of the view that the matters are a proposal of national significance and should be referred to a board of inquiry. Canterbury Regional Council has not expressed a view on the national significance of the proposal, but has stated it has no view on where to direct this proposal for consideration. Further, it stated that it has the available resource to process this proposal if directed to do so.

7. We recommend that the matters are a proposal of national significance and that the matters to be referred to a board of inquiry for consideration and determination.

Description of the proposal

8. On 6 November 2012, the New Zealand Transport Agency (NZTA) lodged an application with us for three notices of requirement and 15 resource consent applications relating to the construction, operation and maintenance of the Christchurch Southern Motorway Stage 2 (CSM2) and Main South Road Four Laning (MSRFL) proposal (“the proposal”). The proposal is to widen and upgrade Main South Road to provide for a four-lane median separated expressway from Park Lane in Rolleston in the Selwyn District to Robinsons Road (MSRFL) and for the construction, operation and maintenance of a motorway between Robinsons Road to the end of the Christchurch Southern Motorway Stage 1 (CSM1) at Halswell Junction Road in Hornby, Christchurch (CSM2).

9. Main South Road will be four-laned from just north of the intersection of State Highway 1 and Park Lane, in Rolleston. This section of the proposal continues north on Main South Road for approximately 4.5km to the connection with CSM2 located between Robinsons and Waterholes Road. MSRFL will consist of a four-lane expressway with two lanes in each direction, separated by a median strip and barrier.
10. The CSM2 part of the proposal will leave Main South Road near Robinsons Road and extend for 8.4km linking to the end of CSM1 (which is currently under construction) at Halswell Junction Road. The road will comprise a four-lane motorway with two lanes in each direction, separated by a median strip and barrier.

11. The local road changes have a combined length of approximately 16 km. A high level plan of the proposal is attached as Appendix A.

12. The proposal is part of the Christchurch Southern Corridor Motorways, one of three state highway ‘corridors’ around Christchurch which are identified as ‘Roads of National Significance’ (RoNS) in terms of the Government Policy Statement on Land Transport Funding 2012 (GPS). This policy identifies roading routes requiring significant development to reduce congestion, improve safety and support economic growth. This proposal aims to provide more efficient and safer access between the Port of Lyttelton, the city centre and the south of Christchurch for people and freight.

13. NZTA considers the proposal will:

- assist regional and national economic growth;
- improve access and connectivity between the Port of Lyttelton, the City Centre and industrial areas in the south of Christchurch and Rolleston by providing a faster and more direct route;
- improve safety performance for motorists;
- improve on reliability and reduction on travel times;
- provide economic development as a result of travel time savings and improved trip time reliability;
- provide an alternative route for through-traffic with direct access to the industrial areas in Hornby, the south of Christchurch and the Port of Lyttelton;
- improve network resilience through the provision of additional road capacity;
- provide potential for improved passenger transport in the south west of Christchurch through a reduction in traffic on existing routes;
- enhancement of active transport by providing links for cyclists and pedestrians; and
- encourage economic growth as a result of the provision of the efficient movement of goods and people.

14. The matters lodged by NZTA are:

**Designations**

i. Two notices of requirement for two new designations \(^1\) in Christchurch City and Selwyn District for the construction, maintenance, operation, use and improvement of a State Highway (CSM2), including associated works to the local road network, between the Christchurch

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\(^1\) A designation is a form of ‘spot zoning’ over a site, area or route in a district plan. A designation restricts anyone other than the requiring authority from carrying out work on the designated land without first obtaining the requiring authority’s permission. Note that NZTA holds requiring authority status for this purpose under the RMA.
Southern Motorway connection near Robinsons Road to Marshs Road and between Marshs Road to the end of the Christchurch Southern Motorway Stage 1 at Halswell Junction Road.

ii. One further notice of requirement for an alteration to designations in the Selwyn District for the widening, upgrading, maintenance, operation, use and improvement of a State highway (MSRFL), including associated works to the local road network, from the State Highway 1/ Park Lane intersection at Rolleston to the Christchurch Southern Motorway connection near Robinsons Road.

Resource Consents – Canterbury Regional Council

iii. Six land use consents relating to the:
   - excavation of land;
   - deposition of fill;
   - use of land to store or use hazardous substances;
   - construction and use of bore for investigation and groundwater extraction;
   - earthworks within riparian margins adjacent to Upper Knights Stream; and
   - works within stream bed.

iv. Two water permits for the:
   - diversion and take of water from water races; and
   - taking of groundwater.

v. Five discharge permits for the:
   - discharge of stormwater to land during construction and operation;
   - discharge of stormwater to water during construction and operation;
   - discharge of water and contaminants to water associated with dewatering;
   - discharge of water and contaminants to land; and
   - discharge of dust to air during construction.

Resource Consents – Christchurch City and Selwyn District Council

vi. Two land use consents for disturbing soil containing contaminants pursuant to Regulation 10 of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011, one for each of the councils.

15. A full list of the matters is attached as Appendix B.

Completeness of the Applications for these Matters

16. As specified in section 145(5) of the RMA, on receipt of matter lodged with the EPA we must, within five working days, review the information provided for completeness pursuant to section 88. We commissioned advice from consultants on this matter.
17. This process was completed on Tuesday 13 November 2012 when the applications were deemed complete in accordance with section 88 of the RMA and therefore we accepted them for further consideration.

18. Following the assessment for completeness the need for further information on the proposal was determined. No additional information request was made under section 149 of the RMA.

**Matters of National Significance**

19. As the proposal does not relate to land inside the coastal marine area, it is solely your decision as to whether these matters are, or are part of, a proposal of national significance. It is also solely your decision as to whether to refer the matters to a board of inquiry, the Environment Court or the relevant local authorities for decision. If you do not consider that the matters are, or are part of, a proposal of national significance, you must direct that they be processed by the relevant local authorities. In this case, the relevant local authorities are the Christchurch City Council, Selwyn District Council and the Canterbury Regional Council.

20. In deciding whether the matters are, or are part of, a proposal of national significance, factors are set out in section 142(3) of the RMA to guide you. You may have regard to any relevant factor, including those factors under section 142(3) of the RMA and our advice.

21. Our advice is that the matters are a proposal of national significance for the reasons set out below. These reasons are considered to be the factors that are relevant to this proposal, and the remaining factors listed in section 142(3) are not considered to be applicable to this proposal and therefore not listed as reasons below.

**The proposal “involves or is likely to involve significant use of natural and physical resources” (section 142(3)(a)(iii))**

22. Under the RMA “natural and physical resources” includes “land, water, air, soil, minerals, and energy, all forms of plants and animals (whether native to New Zealand or introduced) and all structures.”

23. The designation area is approximately 124 hectares, enclosing all necessary construction activities including CSM2 and MSRFL.

24. The proposal is of significant size and scale. If the proposal is approved, it is estimated be approximately $200 million of physical works and require $100 million of property purchases and relocations. The term of construction proposed is three to four years.

25. Land required for the proposal includes Crown land, council owned land (including road and reserves) and privately owned property. In total, there are 27 Crown and 77 council owned land parcels that are required to undertake the MSRFL and CSM2 part of the proposal respectively. In some cases, this land is considered to be a total purchase with severance, while others require only partial purchase. There are also three parcels of property required to implement the railway turning head realignment north of Marshs Road.
26. There is land that is already owned by the Crown for roading purposes; however that comprises less than half of the total land required for the main CSM2 alignment.

27. We consider that the proposal will result in the exclusive use of this designated land for a State Highway. This designation will not allow other uses to occur on land in immediate proximity to the route, and removes any option to use this land for non-roading purposes. This is a significant change in the use of this land that in its current state supports rural activities, private residences, businesses and industries.

28. If approved, the proposal will require significant engineering work to construct nine principal bridge structures, three underpasses and one overpass to ensure the connectivity of the local road network is maintained.

29. Extensive earthworks for the proposal may involve approximately 405,000m$^3$ of excavated material of which 320,000m$^3$ will be used for fill embankments; 1,035,000m$^3$ of total fill is required and 715,000m$^3$ will be sourced from suitable demolition material as a result of the recent Christchurch earthquakes or from local quarries or rivers (Waimakariri/Selwyn). 300,000m$^3$ of top soil will be stripped and stockpiled for reuse. The amount of total fill equates to 51,750 of truck loads with a volume of 20m$^3$.

30. A significant amount of construction vehicle movements (typically large trucks, bulldozers and compactors) will be required to transport fill, aggregates, concrete and other construction materials. Most of these movements will originate from the local quarries and precast yards during the construction period.

31. NZTA has applied to take groundwater for their works. The majority of the works are located in the over-allocated Selwyn-Waimakariri Groundwater Zone. This may result in potential cumulative effects on the groundwater zone.

32. For these reasons we consider the proposal is likely to involve the significant use of natural and physical resources.

The proposal “results or is likely to result in or contribute to significant or irreversible changes to the environment (including the global environment)” (section 142(3)(a)(v))

33. The proposal represents the addition of a motorway to the largely rural environment with large structural and elevated components.

34. The proposal is likely to change and impact on the existing residential and industrial neighbourhoods by visual impacts from noise barriers, embankments, bridge structures, and changes to individual travel routes. It is also likely to cause significant temporary construction noises.

35. For these reasons, we consider the proposal is likely to contribute to significant and/or irreversible changes to the natural and physical environment.
The proposal “will assist the Crown in fulfilling its public health, welfare, security, or safety obligations or functions” (section 142(3)(a)(viii))

36. The purpose of the wider Christchurch RoNS is to provide critical access to and from the Christchurch Central Business District (CBD), the Christchurch International Airport (SH1) and the Port of Lyttelton (SH74 and SH73). The overall proposal is likely to reduce congestion, improve safety and support Christchurch’s economic growth.

37. One of this Government’s priorities is the rebuilding of Christchurch post the 2010 and 2011 earthquakes. Rapid growth and the development of new residential subdivisions to replace ‘red zone’ properties in and around Christchurch, particularly in the Selwyn and Waimakariri Districts, is placing demand on the state highways to the north and south of the city and around its western edge, restricting efficient access to the International Airport and the Lyttelton Port of Christchurch (Lyttelton Port). This proposal is likely to assist with opening up and connecting Lyttelton port to the south of Christchurch City.

38. The proposal is likely to deliver an improved road safety performance for motorists. A high standard, median divided road with grade separated interchanges between Rolleston and CSM1, will separate the different directions of traffic and there will be restricted or no direct access to local roads and individual properties that currently have direct access. NZTA has stated that it is expected to result in a 40% reduction in fatal and serious injury crashes.

39. The proposal is likely to assist the Crown in fulfilling its safety functions by providing a safer upgraded route based on the latest safety roading practices.

40. The proposal provides for an alternative route for through-traffic with direct access to the industrial areas in Hornby, the south of Christchurch and the Port of Lyttelton. Alternative roading is fundamental for Christchurch given its earthquake events and impacts on the roading network. This alternative provides another significant route contributing to security of the roading network.

41. The re-routing of traffic onto the new motorway is expected to reduce traffic volumes through Templeton and Hornby by over 17,000 vehicles per day, with over 2,000 fewer trucks travelling through Templeton daily. The expected rerouting of some heavy vehicles from Main South Road onto Christchurch Southern Motorway, a high class motorway facility, is expected to improve the level of service provided on Main South Road. It is also expected to lead to a decrease in traffic on Jones Road, the primary passenger transport route between Christchurch and Rolleston. This will significantly contribute to promotion of the Jones Road route for passenger transport.

42. For these reasons, we consider the proposal likely to assist the Crown in providing a safe, reliable, secure and resilient road by the provision of an alternative route into and out of southern Christchurch, ability to withstand natural hazards, the latest safety design standards, and an increased efficiency of freight movements.
The proposal “affects or is likely to affect more than 1 region or district” and “relates to a network utility operation that extends or is proposed to extend to more than 1 district or region” (section 142(3)(a)(ix) and section 142(3)(a)(x))

43. The proposal traverses the boundaries of Christchurch City and Selwyn District and also falls within the jurisdiction of the Canterbury Regional Council.

44. The proposal will complete the current Christchurch Southern Corridor identified within the Christchurch Motorways RoNS. As such the benefits of the proposal are considered in the context of the Christchurch Southern Corridor and wider Christchurch strategic network.

45. The Christchurch Southern Corridor forms a strategic link between State Highway 1 (from the south) to the Lyttelton Port. It will form part of the southern segment of the Christchurch Strategic network. In addition, Canterbury’s growing rural economy, in conjunction with the increased importance of the Lyttelton Port to Canterbury and the effects of the recent Canterbury earthquakes on urban growth areas mean that the Christchurch Southern Corridor is a significant piece of infrastructure for the future Canterbury economy. Benefits of access to the port would also be relevant to other regions in the greater South Island.

46. For these reasons, we consider that the proposal (as part of the Christchurch Southern Corridor in its entirety) is likely to affect and extend to more than 1 region or district.

Any relevant factor

47. The Government has signalled through the National Infrastructure Plan and the GPS, the continued funding of the seven RoNS that are critical to support New Zealand’s economic growth aspirations. This policy identifies road routes requiring significant development to reduce congestion, improve safety and support economic growth. The GPS also placed particular importance on rebuilding the land transport system in Canterbury. This proposal, being a significant piece of the wider Christchurch transport network, is therefore considered to be an important piece of infrastructure for the rebuild of Christchurch.

48. NZTA began preparing for the Christchurch Southern Motorway proposal prior to the September 2010 and February 2011 earthquakes. However as a result of these earthquakes there is emphasis on residential development for the southwest of Christchurch (such as Rolleston, Prebbleton and Halswell). The Christchurch Southern Corridor is likely to support urban and economic growth by easing severe congestion to the north and south of Christchurch and maintain critical access to and from Christchurch City, the Christchurch International Airport and the Port of Lyttelton.

Conclusion on National Significance

49. The proposal is of a size and scale that is likely to involve the significant use of natural and physical resources and has the potential to contribute to significant and irreversible changes to the environment. The proposal will assist the Crown in fulfilling its public welfare, security and safety obligations by the provision of an alternative route for greater resilience to the state highway network. The proposal is a key section of the Christchurch Southern Corridor that has
been identified by the Government as a Road of National Significance. Lastly, the proposal will assist in the rebuilding of Christchurch.

50. We consider that the matters that make up the proposal, are a proposal of national significance for the reasons outlined in this advice.

Direction and Referral

51. If you agree that the matters are a proposal of national significance, you may refer them to a board of inquiry, the Environment Court or the Christchurch City Council, Selwyn District Council and the Canterbury Regional Council for a decision under section 147(1) of the RMA. In making this decision, you must have regard to the views of the relevant local authorities, the applicant and the EPA. You must also have regard to the capacity of the relevant local authorities to process the proposal.

52. If you do not find that the matters are, or are part of, a proposal of national significance, you must refer the matters to the relevant local authorities for processing.

Views of relevant Local Authorities

53. In making a decision on a direction on these matters you are required to have regard to the views of the relevant local authorities and the applicant under section 147(4) of the RMA. We have sought, on your behalf, the views of the Christchurch City Council, Selwyn District Council and Canterbury Regional Council with jurisdiction for these matters, on whether they should be processed by a board of inquiry or the Environment Court and whether the Councils would have the capacity to process the matter if they were not.

54. Christchurch City Council is of the opinion that there would be benefit in the matter being processed by a board of inquiry. This is based on the significance that this matter has been accorded by Government as a road of national significance, the fact that it traverses two territorial councils and also involves the regional council. Further, Christchurch City Council staff are extremely busy at present with work relating to earthquake recovery and therefore are unable to provide the necessary staff resource to process the notice of requirement and any accompanying resource consents.

55. Selwyn District Council has advised us that it considers the matter best be handled by the EPA and that they currently have limited capacity to handle the matter.

56. Canterbury Regional Council advised us that it understands the three possible options available for the processing of the applications as the board of inquiry, the Environment Court via a direct referral or by the local authority. The Regional Council advised us that it has no view on which of the possible options it prefers. Further, it stated that it regularly process applications of the indicated scale of the NTZA proposal and has the available resource to do so.
The Applicant’s views

57. NZTA considers that its proposal is nationally significant and should be referred to a board of inquiry for the following reasons:

- “the Project has attracted widespread public interest since it was announced as part of the Christchurch Southern Corridor, an identified RoNS in terms of the 2009 GPS. During consultation there has been a high level of public engagement and numerous submissions have been received throughout this process (section 142(3)(a)(i));

- the Project will involve the use of natural and physical resources. It is a roading Project that will result in the use of designated land for a State highway. This will be a significant change in the use of land from its current state, which supports numerous land uses such as rural activities, private residences, businesses and industries (section 142(3)(a)(ii));

- the Project will assist the Crown in fulfilling its safety functions by providing a safer upgraded route based on the latest safety roading practices. This includes a median and barrier separating the different directions of traffic and there will be restricted or no direct access to local roads and individual properties that currently have direct access (section 142(3)(a)(viii));

- the Project will result in irreversible changes to the environment where it will involve the addition of a motorway to the largely rural environment with large structural and elevated components (section 142(3)(a)(v)); and

- the Project relates to a network utility operation (the State highway) that will extend over more than one district (Christchurch and Selwyn Districts) (section 142(3)(a)(x)).”

58. We agree with the Applicant’s views above on national significance except the first point. Our view is that this proposal has not aroused widespread public concern or interest regarding its actual or likely effect on the environment (including the global environment). Public interest appears to be localised; there has been a low level of media coverage and the number of submissions received throughout NZTA’s engagement process is considered to be low.

Our Advice

59. We recommend that the matters be referred to a board of inquiry for decision, for the following reasons:

i. We consider the matters are a proposal of national significance.

ii. The Government has signalled through the National Infrastructure Plan and the GPS, the continued funding of the seven RoNS that are critical to support New Zealand’s economic growth aspirations. The Christchurch Southern Corridor, which this proposal is part of, is one of those RoNS. Directing this proposal to a board of inquiry for a decision recognises the importance the Government has placed on this infrastructure project.
The board of inquiry process will provide for a comprehensive assessment of the notices of requirement, land use and resource consent applications within a streamlined process.

NZTA began preparing for the Christchurch Southern Motorway proposal prior to the September 2010 and February 2011 earthquakes. However as a result of these earthquakes there is emphasis on residential development for the southwest of Christchurch (such as Rolleston, Prebbleton and Halswell) and therefore a timely decision on this proposal is important.

The board of inquiry process will provide greater certainty for all parties to the application as a decision is required within nine months. The Environment Court or the relevant local authorities are not subject to this timeframe.

Christchurch City and Selwyn District Council advised us of their limited capacity to process the matter, where as Canterbury Regional Council has the resource to process the regional consents should it be directed to do so.

You may appoint members to a board of inquiry who, between them, have the range of specific expertise relevant to this proposal such as resource management, transport, engineering, environmental science, tikanga Māori, and local knowledge.

Note that we have enjoyed a positive co-operative relationship with officers of the Christchurch City Council, Selwyn District Council and the Canterbury Regional Council throughout the pre-lodgement process. Our recommendation should not be regarded as inferring any deficiency in the capability of these local authorities to process these matters.

**Other Intervention Options**

If you do refer the matters to a board of inquiry, the following options are also available to you under sections 149S and 149ZA of the RMA:

i. Extend the nine month timeframe for a board of inquiry to determine the matters.

ii. Direct that a submission be made on the matters for the Crown.

We recommend that you do not exercise any of these powers at this time.
Appendix A: High level plan of the Christchurch Southern Motorway Stage 2 and Main South Road Four Laning proposal
Appendix B: Full list of matters applied for the Christchurch Southern Motorway Stage 2 and Main South Road Four Laning proposal

Selwyn District Council

Notice of requirement applied for under Selwyn District Council jurisdiction

NSP 12/02.001: Notice of requirement for a new designation for the construction, maintenance, operation, use and improvement of a State highway (the Christchurch Southern Motorway Stage 2 Project), including associated works to the local road network, between the Christchurch Southern Motorway connection near Robinsons Road to Marshs Road (Selwyn District/Christchurch City authority boundary).

NSP 12/02.002: Notice of requirement for an alteration to designations in the Selwyn District (TR 1 and TR4) for the widening, upgrading, maintenance, operation, use and improvement of a State highway (Main South Road Four Laning Project), including associated works to the local road network, from the State Highway 1/Park Lane intersection at Rolleston to the Christchurch Southern Motorway connection near Robinsons Road.

Resource consents applied for under Selwyn District Council jurisdiction

NSP 12/02.003: Land use consent for disturbing soil containing contaminants where there is a risk to human health and changing the use of land containing contaminants where there is a risk to human health pursuant to Regulation 10 of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (SR 2011/361).

Christchurch City Council

Notice of requirement applied for under Christchurch City Council jurisdiction

NSP 12/02.004: Notice of requirement for a new designation for the construction, maintenance, operation, use and improvement of a State highway (the Christchurch Southern Motorway Stage 2 Project), including associated works to the local road network, between Marshs Road (Selwyn District/Christchurch City authority boundary) to the end of the Christchurch Southern Motorway Stage 1 at Halswell Junction Road.

Resource consent applied for under Christchurch City Council jurisdiction

NSP 12/02.005: Land use consent for disturbing soil containing contaminants where there is a risk to human health and changing the use of land containing contaminants where there is a risk to human health pursuant to Regulation 10 of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (SR 2011/361).

Canterbury Regional Council

Resource Consents applied for under Canterbury Regional Council jurisdiction

NSP 12/02.006: Land use consent for excavation of land over an unconfined or semi-confined aquifer where excavation is either deeper than 5m or deeper than the highest groundwater level and volume is greater than 100m³ (e.g. at the Robinsons Road overpass, where the local road passes under the highway; and, the Halswell Junction Road stormwater detention ponds). This consent is sought generally across the designated
area and will apply to other areas within the designation where these situations arise.

**NSP 12/02.007:** Land use consent for deposition of fill of more than 50m$^3$ over an unconfined or semi-confined aquifer where land is excavated to a depth of 5m or deeper and groundwater is less than 30m below ground level (e.g. the Robinsons Road overpass and the Halswell Junction Road stormwater detention ponds). This consent is sought generally across the designated area and will apply to other areas within the designation where these situations arise.

**NSP 12/02.008:** Land use consent for hazardous substance use and storage during construction.

**NSP 12/02.009:** Land use consent for earthworks within the riparian margin adjacent to Upper Knights Stream.

**NSP 12/02.010:** Land use consent for the disturbance / reclamation of former stream bed (Upper Knights Stream).

**NSP 12/02.011:** Land use consent for the construction and use of bores generally within the proposal designation area and for all land adjoining the proposed designation, including:
- Investigation and monitoring bores;
- Bore/ infiltration facilities related to the Robinsons Road overpass and Halswell Junction Road ponds (dewatering facilities); and
- Domestic and stockwater bore relocation.

**NSP 12/02.012:** Water permit for diversion and take of water from water races.
- Weedons Ross Road (north side);
- Weedons Ross Road (south side);
- Main South Road;
- Robinsons Road;
- North of Robinsons Road;
- Waterholes Road;
- Trents Road;
- Marshs Road;
- Springs Road;
- Halswell Junction Road (Montgomery’s drain); and
- John Paterson Drive.

**NSP 12/02.013:** Water permit for taking groundwater as required (dependant on groundwater levels) at Robinsons Road and the Halswell Junction Road ponds.

**NSP 12/02.014:** Discharge permit for discharge of stormwater to land during construction and operation. Global consent is sought for discharge to land via swales, soak pits, ponds and siphons throughout the proposal designation area.

**NSP 12/02.015:** Discharge permit for discharge of stormwater from the stormwater treatment facilities to water (Montgomery’s Drain and other water race locations within the proposal designation area) during extreme groundwater and/or rainfall events.
**NSP 12/02.016**: Discharge permit for the discharge of water and contaminants to surface water associated with dewatering (Montgomery’s Drain, Upper Knights Stream and a stockwater race at Robinsons Road).

**NSP 12/02.017**: Discharge permit for discharge of water and contaminants to land associated with dewatering at Robinsons Road.

**NSP 12/02.018**: Discharge permit for discharge of dust to air during construction, from earthworks and construction activities.