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Fast-track Approval Application

Resource Consent Applications, Wildlife Act Permit & Archaeological Authority

prepared for

CARTER GROUP LIMITED

Ōhoka Residential Subdivision

June 2026

Fast-track application prepared for

CARTER GROUP LIMITED

Ōhoka Residential Subdivision

Novo Group Ltd
Level 1, 279 Montreal Street
PO Box 365, Christchurch 8140
P: (03) 365 5570
E: info@novogroup.co.nz
W: www.novogroup.co.nz

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Project Manager:	Jeremy Phillips, Director and Senior Planner (Novo Group)
Prepared by:	Tim Walsh, Consultant (Novo Group), and Pia Jackson, Resource Management Planner (Inovo Projects) [See **Appendix 48** for a statement of relevant qualifications and experience]
Reviewed by:	Jeremy Phillips, Director and Senior Planner (Novo Group)

Executive Summary

Overview of the Proposal

1. This application seeks approval under the Fast-track Approvals Act 2024 (**the Act**) for the subdivision and development of approximately 154 hectares of rural zoned land adjoining the Ōhoka settlement in the Waimakariri District. The proposal provides for:

    - 879 residential allotments of varying sizes,
    - a local centre providing day-to-day goods and services,
    - a retirement village of up to 250 units,
    - a polo ground and associated facilities, and
    - a comprehensive network of roads, reserves, waterways, and three-waters infrastructure.

2. The project represents a master-planned expansion of the existing Ōhoka settlement, delivering a walkable village structure, local amenities, and extensive open space and waterway enhancement.

3. The proposal is a listed project under Schedule 2 of the Act and is supported by detailed expert assessments.

Project Benefits

4. The proposal delivers significant regional benefits. The benefits of the project include economic as well as broader positive impacts that are not readily quantified in economic terms including:

    - a substantial increase in housing supply and housing choice in the Waimakariri District including retirement living,
    - a response to demonstrated, location-specific demand for residential living at Ōhoka that is not readily met in the main urban centres of the district,
    - approximately $400 million in regional economic value during construction phase, with sustained construction employment and ongoing local jobs,
    - establishment of a local centre contributing $24 million in regional value added and supporting employment, as well as improving self-sufficiency and reducing vehicle travel for local convenience goods and services,
    - efficient use of existing and planned infrastructure, with developer-funded upgrades where required,
    - transition from intensive agriculture to urban use, resulting in reduced nutrient and E. coli discharges to freshwater,

- long-term enhancement of waterway corridors, open space, and recreational access, and

- development of recreational facilities, including walkways/cycleways and a polo complex.

Statutory Context and Decision Framework

5. This application is assessed under the Act, not under the conventional framework of the Resource Management Act 1991 (**RMA**). The Act expressly anticipates that Fast-track projects may:

   - involve adverse environmental effects,

   - be inconsistent with planning instruments, and

   - include activities that would otherwise be prohibited under the RMA.

6. Under section 85(3) of the Act, the panel may only decline the application if it is satisfied that the project would result in adverse impacts that are sufficiently significant to be out of proportion to the regional or national benefits of the project[1].

7. Accordingly, the central question for the panel is not whether the proposal aligns with planning policy or avoids adverse effects, but whether the adverse impacts of the proposal are sufficiently significant to be out of proportion to the benefits delivered by the project.

8. As per a recent Fast-track decision[2], the section 85 assessment involves:

   - identifying and quantifying (where possible) the material adverse impacts,

   - identifying and quantifying (where possible/appropriate) the nationally/regionally significant benefits,

   - evaluating the impacts and benefits, including the effect of conditions, and

   - determining whether any adverse impacts are sufficiently significant to be out of proportion to the benefits.

9. If there is an adverse impact or impacts that are out of proportion to the benefits, the panel would be required to exercise its discretion in section 85(3).

Key Adverse Impacts Relevant to Section 85(3)

10. The assessment identifies urban form related adverse impacts as potentially being a relevant consideration under section 85(3).

[1] Section 85(1) and (2) detail the circumstances in which approval must be declined. None of those circumstances apply to this application because the approvals sought are not for ineligible activities, granting the approvals would not breach section 7 of the Act, and this is not an application for a coastal permit for aquaculture activities
[2] See the Pound Road Industrial Development decision [FTAA-2505-1057]

11. The proposal would expand the Ōhoka settlement beyond areas identified for urban growth in the Canterbury Regional Policy Statement, the Greater Christchurch Spatial Plan, and the Waimakariri district planning framework. In that respect, the proposal is inconsistent with aspects of the planned settlement pattern for Greater Christchurch.

12. The urban form effects are assessed as more than minor, reflecting the scale of change from a rural to an urban environment and the resulting change in character, land use, and traffic patterns. These effects are localised to Ōhoka and its immediate surroundings and do not undermine the functioning of the district's main urban centres. These effects are not considered to be of a significant magnitude.

Mitigation, Management, and Residual Effects

13. The application includes proposed conditions designed to avoid, mitigate, remedy, manage and/or offset adverse effects. The conditions would not eliminate all adverse effects, but they substantially reduce their scale, extent, and significance, and result in high quality environmental outcomes, particularly in respect of freshwater quality and ecological function.

Section 85(3) Conclusion

14. The proposal involves adverse impacts that are acknowledged and, in some cases, unavoidable – most notably in relation to urban form. Those impacts are localised, well understood, and substantially mitigated.

15. When weighed against the scale, certainty, and longevity of the project's regional benefits, the residual adverse impacts do not reach the threshold of being out of proportion as contemplated by section 85(3) of the Act.

16. The proposal therefore meets the statutory test for approval under the Act.

Expert Assessment Summaries

17. The conclusion reached in respect of section 85(3) is informed by comprehensive expert analysis. The following provides brief summaries of the expert assessments that were relied on for assessing effects on the environment, formulating proposed conditions, and analysing the statutory planning documents.

Geotechnical

18. The geotechnical assessment concludes that the site is suitable for the proposed development from a geotechnical perspective. The report finds that damaging liquefaction is unlikely and that liquefaction risk for the project is negligible, with static settlement, erosion and slippage assessed as low risk subject to appropriate earthworks, stormwater management and detailed design measures. Further investigation and design may still be required for specific areas as the project progresses.

Land Contamination

19. The detailed site investigations found that the wider site is generally free of significant contamination, with elevated contaminants largely confined to localised areas associated with existing and former buildings, burn piles and the historic rail yard. Localised exceedances of residential soil contaminant standards were identified for arsenic, cadmium and lead, and asbestos was detected in one sample in the original investigation; however, the second investigation further delineated the affected areas and did not confirm asbestos in the additional soil and building material samples tested. Overall, the reports conclude the site is suitable for the proposed development subject to a remediation action plan, appropriate management of identified hotspot soils, and subsequent site validation.

Loss of Productive Soils

20. The productive land assessment concludes that, while the site comprises Land Use Capability (**LUC**) Class 2 and 3 soils, it is not treated as highly productive land under the National Policy Statement for Highly Productive Land 2022 because the site was subject to a council-initiated plan change to rezone it from Rural to Rural Lifestyle Zone at the commencement of the policy statement, and it is now zoned Rural Lifestyle under the Partially Operative Waimakariri District Plan.

21. The report finds that the productive capacity of the site is materially constrained by soil wetness, with soils being predominantly clay-based and 98% of the site described as poorly or very poorly drained, meaning productive use is limited unless land uses or crops are suited to wet conditions.

22. In terms of the Canterbury Regional Policy Statement, only 2.86 ha of the 154.46-hectare site is identified as LUC Class 2 versatile soil, and 2.11 hectares of that area is affected by drinking water protection zones, leaving only 0.75 hectares of versatile soils outside those constraints. On that basis, the assessment concludes that the proposal would have less than minor adverse effects on productive land capacity.

Water

Groundwater

23. The groundwater and water supply assessment concludes that the development can be serviced by a new deep community water supply (beyond Stage 1 of the subdivision which would connect to the existing supply), with up to approximately five new deep bores anticipated to meet future demand, together with a shallow subsoil drainage system that will discharge drained groundwater back to the site. The assessment finds that effects on existing groundwater users, groundwater allocation, surface water depletion and water quality would be less than minor, and in several respects positive, particularly because the existing shallow irrigation bores and associated consents would be decommissioned and surrendered, resulting in a net reduction in groundwater abstraction and allocation.

Surface Water

24. The hydrology and wetland assessments identify a network of streams, springheads, drains and 15 natural inland wetlands (totalling approximately 4.29 hectares) across the site, with wetland areas generally associated with overland flow paths, depressions, springheads

and watercourse margins. Subject to proposed stormwater management, buffering and construction controls, effects on springs, wetlands, groundwater-surface water interactions and downstream flows are assessed as minor and able to be appropriately managed, with the wetland assessment recommending protection and enhancement of retained wetlands and mitigation of any wetland loss through the instatement of new wetland areas at no less than a 1:1 ratio.

Ecology

Aquatic

25. The aquatic ecology assessment identifies a network of spring-fed streams, channels, drains and wetlands across the site, with the Ōhoka Stream tributary and South Ōhoka Branch assessed as having high ecological value due to features including trout spawning habitat, longfin eel presence and some remaining potential for ecological recovery, while other channels are assessed as having moderate to low value because of modification and degraded instream and riparian condition. The assessment concludes that, although the proposal will involve some channel modification and wetland loss, these effects can be appropriately addressed through riparian restoration, wetland creation and enhancement, fish passage design, stormwater treatment and ongoing monitoring, with the proposed mitigation intended to achieve no net loss and a net positive ecological outcome relative to the current farmed baseline.

Terrestrial

26. The terrestrial ecology assessment, focused on lizards, confirms that the site supports Canterbury grass skink, an At Risk – Declining species, within suitable habitat including dense exotic vegetation, debris piles, disused structures and vegetated riparian margins, while baseline surveys did not confirm the presence of Waitaha gecko or McCann's skink on the site. As the proposal would remove identified lizard habitat, a lizard management plan provides for staged habitat clearance, full salvage and relocation of lizards to an enhanced and protected on-site relocation area, together with habitat enhancement, predator management and monitoring to avoid, minimise and remediate adverse effects on native lizards.

27. No other noteworthy terrestrial values were identified.

Avifauna

28. The avifauna assessment found that the site provides some bird habitat, primarily within tree stands and around farm structures, but that overall avifauna values are low, with field surveys recording 13 species on the site, including seven native species, all classified as Not Threatened. The report concludes that the site is unlikely to support threatened wetland-associated species for breeding or nesting, that habitat removal is unlikely to significantly disrupt habitat connectivity in the wider area, and that the proposed landscape planting has potential to provide replacement habitat and longer-term gains for some bird species.

Archaeology

29. The archaeological assessment identifies that the proposal would impact the recorded site of the former Ōhoka Railway Station (M35/1875), together with likely pre-1900 drains and water races, and it may also impact unrecorded subsurface archaeological remains associated with 19th century farming occupation near modern 543 Mill Road and Lot 1 DP 55849, Bradleys Road. The railway station site is assessed as having medium archaeological value, with the proposed retention of the standing concrete loading bank within a heritage reserve and associated public interpretation helping to reduce effects on that feature, although most of the remains of the wider railway station site is still expected to be lost. Overall, the report concludes that archaeological monitoring, recording, investigation and reporting would partially mitigate effects.

Landscape

30. The landscape assessment concludes that, while the proposal will change the site from an open pastoral setting to a more developed and compartmentalised urban environment, that change is appropriately moderated through the retention and enhancement of waterways, extensive open space, riparian planting, boundary landscape treatments and the integration of existing vegetation where practicable. Effects on landscape character and values are assessed as low-moderate, and effects on visual amenity are assessed as low to very low following mitigation.

Urban Design

31. The urban design assessment finds that the proposal aligns well with the seven ‘C’s’ of the New Zealand Urban Design Protocol and would deliver a well-connected, high-amenity and context-responsive extension of Ōhoka. The masterplan is assessed as providing a strong urban design outcome through its integrated village centre, range of housing and living options, extensive walking and cycling connections, landscaped green-blue network, and design measures intended to reinforce Ōhoka’s rural village character while supporting a high standard of future residential development.

Infrastructure

32. The infrastructure assessment concludes that the proposed development can be serviced by conventional infrastructure for earthworks, transport, wastewater, stormwater, potable water, and utilities, with the report identifying feasible servicing solutions across all of these areas. In particular, it provides for a comprehensive road and footpath network, a low-pressure sewer system draining to a central pump station and existing rising main, stormwater management through primary and secondary networks and stormwater management areas, a staged potable water solution combining the existing Ōhoka supply for Stage 1 with a new community supply from deep bores for later stages, and electricity and telecommunications connections, while also concluding that flooding and construction-related effects can be appropriately managed through proposed design and mitigation measures. Overall, the report finds that the development can be provided with the necessary infrastructure with an acceptable level of adverse effects.

Transport

33. The integrated transport assessment concludes that the proposed development can be accommodated by the transport network, subject to identified mitigation and infrastructure upgrades. The proposed subdivision would be served by access from Whites Road, Bradleys Road and Mill Road, together with an internal street, footpath and shared path network designed to support vehicles, walking and cycling and to accommodate potential future bus services. The assessment identifies that some elements of the proposed layout do not comply with district plan transport standards, particularly in relation to road cross-sections, intersection separation and some access arrangements, but concludes these are justified in the context of the urban form proposed and can operate acceptably. For the wider network, the report finds that the transport effects are acceptable provided that the planned and recommended upgrades are delivered, including the funded Tram Road / Bradleys Road / McHughs Road roundabout, safety improvements at Tram Road / Whites Road, and upgrades at Flaxton Road / Threlkelds Road and Mill Road / Threlkelds Road, together with signal phasing changes at the SH1 / Tram Road interchange.

Greenhouse Gas Emissions

34. The greenhouse gas emissions assessment concludes that the proposed subdivision is expected to support a reduction in greenhouse gas emissions overall and is not anticipated to result in significant adverse effects in this context. This conclusion is based on the compact urban form of the proposed development, provision for walking and cycling, inclusion of a commercial centre to reduce travel distances for day-to-day needs, prohibition of reticulated LPG infrastructure, and the view that a coordinated expansion adjoining the existing Ōhoka township is likely to be less emissions-intensive than more dispersed rural lifestyle development patterns.

35. The assessment also identifies that redevelopment of the site from dairy farming to residential use will remove an existing source of agricultural greenhouse gas emissions, particularly methane and nitrous oxide associated with livestock, fertiliser use and effluent management. It further notes that while emissions would arise during construction, the proposed layout includes features intended to help limit emissions, including efficient infrastructure provision, use of existing road access, a relatively flat site limiting major earthworks, and extensive planting that is expected to increase vegetation cover and carbon sequestration relative to the current baseline.

Economic Costs

36. The economic costs assessment concludes that the two principal potential economic costs of the proposal are possible adverse distributional effects on the existing centre network arising from the proposed commercial centre, and the loss of productive land and land-based primary production activity on the site. It also notes some other potential economic disbenefits but treats these as secondary and more uncertain.

37. In relation to the proposed commercial centre, the assessment finds that the likely centre is of a scale appropriate to a local centre role, with an estimated reasonable business floorspace scenario of 9,390m^2, including a food, grocery and liquor component of about 1,100–1,350m^2. Using a calibrated food, grocery and liquor retail gravity model, the report concludes that no existing centre in Waimakariri District, including the nearby Mandeville

centre, would experience more than minor adverse distributional effects. For the wider centre network, effects are assessed as less than minor, while effects on Mandeville are assessed as no more than minor and recoverable over time.

38. For productive capacity, the report concludes that while the proposal would permanently remove LUC 2 and 3 land from primary production use, that loss is negligible when measured against the total extent of LUC 1–3 land in the district. It also concludes that the loss of the existing farming activity, being a mix of dairying and cattle breeding, would have a negligible effect on the regional economy. The assessment estimates that the current farming operation contributes about $724,400 in total annual value added and around four FTEs per annum, which it regards as economically negligible in the district and regional context.

39. Further, the report identifies some possible additional economic disbenefits including potential inefficiencies in the use of existing or planned infrastructure elsewhere, possible long-term infrastructure cost risks for council if not fully recovered, and possible education-related costs associated with growth in the Ōhoka area. However, these are described as uncertain, unquantified, and at most less than minor in effect on economic wellbeing in Waimakariri District. The report also discusses other project impacts including the loss of wetlands and archaeological values but concludes that:

> *other impacts of the Project* [including traffic and infrastructure impacts] *are best evaluated using the qualitative technical reports of the relevant experts rather than attempting to quantify them in economic (monetary) terms where the richness of those assessments would most likely be lost.*

Assessment of Effects on the Environment & Statutory Analysis

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List of Abbreviations and Acronyms

Annual Exceedance Probability	AEP
Average Recurrence Interval	ARI
Australian and New Zealand Guidelines for Fresh and Marine Water Quality	ANZG
Canterbury Land and Water Regional Plan	LWRP
Canterbury Regional Council	Regional Council or ECan
Canterbury Regional Policy Statement	RPS
Carter Group Limited	Applicant
Commonly owned access lots	COAL
DCM Urban Design	DCM
Department of Conservation	DOC
Detailed Site Investigation	DSI
Environment Institute of Australia and New Zealand	EIANZ
Erosion Sediment and Control Plan	ESCP
Fast-track Approvals Act 2024	the Act
Greater Christchurch Spatial Plan	GCSP
Greenhouse gas	GHG
Hazardous Substances and Industries List	HAIL
Heritage New Zealand Pouhere Taonga Act 2014	Heritage NZ Act
Heritage New Zealand Pouhere Taonga	Heritage NZ
Land Use Capability	LUC

Long Term Plan	LTP
Mahaanui Iwi Management Plan	IMP
Mahaanui Kurataiao Limited	MKT
Metres below ground level	mbgl
National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health	NES Soil
National Environmental Standards for Freshwater	NES Freshwater
National Environmental Standards for Sources of Human Drinking Water	NES Drinking Water
National Policy Statement for Freshwater Management	NPS-FM
National Policy Statement on Highly Productive Land	NPS-HPL
National Policy Statement on Urban Development	NPS-UD
Operative Waimakariri District Plan	OWDP
Pattle Delamore Partners	PDP
Partially Operative Waimakariri District Plan	POWDP
Underground Overground Archaeology	UOA
Remedial Action Plan	RAP
Resource Management Act 1991	RMA
Technical Category 1	TC-1
Total suspended solids	TSS
Site Management Plan	SMP
Stormwater management area	SMA
Stormwater retention ponds	SRP

Waimakariri 2048 District Development Strategy	DDS
Waimakariri District Council	District Council
Wildlife Act 1953	Wildlife Act

Introduction

Purpose of the Application

1. This substantive application seeks authorisation for subdivision (as indicated in **Figure 1**) and development of a 154-hectare rural zoned site that adjoins the Ōhoka settlement in the Waimakariri District. The application is made under Fast-track Approvals Act 2024. It is made by Carter Group Limited (**Applicant**) which is the 'authorised person' for the Ōhoka Residential Subdivision project listed at Schedule 2 of the Act. An authorised persons statement is included at **Appendix 1**.

2. The proposed development is a comprehensive expansion of the Ōhoka settlement. It provides opportunities for people who seek a rural village lifestyle in a walkable/cyclable community without the cost and upkeep involved in larger rural properties of four hectares and above. It also provides local convenience goods and services for residents, retirement living opportunities and a polo ground with associated facilities.

3. The proposal enhances the amenity values and ecology of the existing waterways throughout the site and creates a high amenity open space network for the benefit of residents and the wider population. The proposed open space network is also designed to manage stormwater.

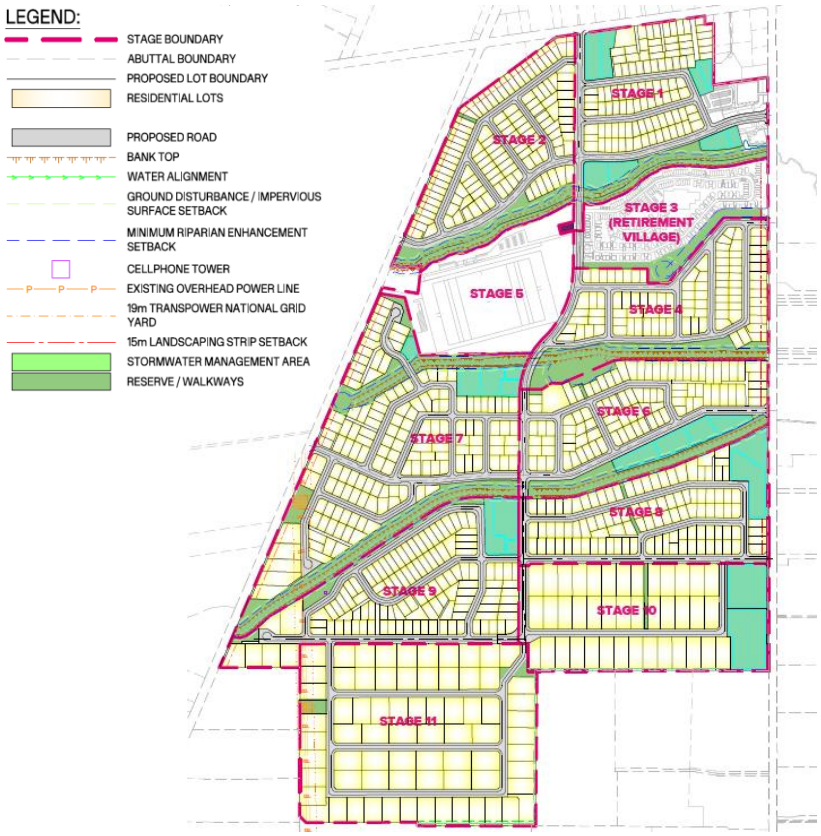

Figure 1: General layout of the proposed subdivision
Source: Inovo Projects

4. Efficiencies can be gained through the availability of three waters infrastructure, available capacity of the road network, and the proximity to Christchurch/Ōtautahi and the main centres in the Waimakariri District.

5. The proposal enables people and communities to provide for their economic and social well-being, is an efficient use and development of natural and physical resources and adds significantly to residential development capacity.

Project Overview

6. The proposal entails the creation of 879 residential allotments, a large allotment to accommodate a retirement village, two super lots to accommodate a small local centre over a 1.5-hectare area, a 7.5-hectare allotment to accommodate a polo ground, and several access lots, along with various allotments to vest as road, reserve, and utility purposes. The proposal also seeks authorisation to establish future dwellings, commercial activities, the retirement village and the polo ground and associated facilities within the proposed allotments.

Project Benefits

7. Market Economics has prepared an economic assessment of the project which is included at **Appendix 2**. The assessment finds that the project assists in addressing housing affordability in the district. Further, Market Economics expects the project to generate significant benefits, including an estimated $400 million in value added to the regional economy during development. The construction phase would sustain approximately 200 full-time jobs per year, while the proposed commercial centre would support 462 jobs annually. Additionally, the local centre is predicted to generate approximately $24 million annually to the region's GDP.

8. In addition, the project would deliver a range of non-economic benefits, including the transition from intensive agricultural use to urban development, leading to reduced nutrient loads and E. coli discharges to freshwater. It would also provide long-term improvements to waterway corridors, enhance open space and public access, and support recreational opportunities through the development of facilities such as walkways, cycleways, and a polo complex.

Project Background

9. No previous applications for a resource consent or a notice of requirement have been made in relation to the proposal. The Applicant has however sought to enable the project through a private plan change to amend the zoning in the District Plan. The Waimakariri District Council (District Council) declined the request.

10. The Applicant also pursued the rezoning of the site through the Proposed Waimakariri District Plan (**Proposed Plan**) process. The District Council notified its decisions on the Proposed Plan on 14 July 2025 and rejected the Applicant's submission on the Proposed Plan. Carter Group disagrees with the decision and has appealed.

11. Carter Group were directed by the Environment Court to withdraw its appeal on the private plan change at the same time the appeal on the Proposed Plan was lodged. It withdrew its appeal in accordance with the Court's direction, meaning the Proposed Plan appeal has essentially replaced the appeal on the private plan change. Given the current stage of those proceedings and the absence of a hearing date, the proposal has already been subject to significant delay and despite the Applicant's views on its chances of success, the project faces a considerable further delay of years before the Environment Court.

Relevant Legislation and Regulations

12. This application is made under the Act. It seeks approvals under:

- section 42(4)(a) for subdivision and land use resource consents that would have otherwise been applied for under the RMA.

- section 42(4)(h) for a wildlife approval which is an authority for an act or omission that would otherwise be an offence under various sections of the Wildlife Act 1953 (**Wildlife Act**).

- section 42(4)(i) for an archaeological authority.

13. The national and local regulations that also apply to the proposal include:

- Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (**NES Soil**)

- Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009

- Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (**NES Freshwater**)

- Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007 (**NES Drinking Water**)

- The Operative Waimakariri District Plan (**OWDP**) as first made operative on 1 November 2005 and as most recently revised on 22 November 2024

- The Partially Operative Waimakariri District Plan (**POWDP**) as notified on 14 July 2025.

- The Canterbury Land and Water Regional Plan (**LWRP**) first made operative on 1 September 2015. It incorporates Plan Changes 1-7, noting that Plan Change 7 is partially operative. A further plan change, Plan Change 8, is on hold prior to being notified while the Regional Council seek clarification from the Minister for the Environment.

Fast-track Approval Act Requirements

Pre-lodgement Requirements

Consultation

14. This application is lodged following the commencement of amendments to the Act (via the Fast-track Approvals Amendment Act 2025) that (among other things) removed the general requirement for pre-lodgement "consultation" for projects listed in Schedule 2. Notwithstanding this change, the transitional provisions of the Act provide that where the authorised person consulted or started consulting prior to 31 March 2026, the authorised person must "finish" their recommencement consultation before a substantive application is lodged. Consultation for this project was initiated prior to 31 March 2026 and has therefore been completed in accordance with those transitionary provisions. The Applicant has therefore complied with the relevant requirements of the Act.

15. The consultation undertaken reflects the scope of consultation commenced prior to 31 March 2026, including engagement with the relevant local authorities (being the district and regional councils), Te Ngāi Tūāhuriri Rūnanga as the relevant iwi authority and tangata whenua, and the relevant administering agencies, including the Department of Conservation (**DOC**) and Heritage New Zealand Pouhere Taonga (**Heritage NZ**). A record of the consultation undertaken to date is presented in **Table 1**. It includes a record of consultation undertaken with Transpower New Zealand Limited (**Transpower**), which is not an administering agency for the purposes of the Act.

Table 1: Record of consultation

Party consulted	Method of consultation	Relevant documents
Canterbury Regional Council (**Regional Council** or **ECan**)	Meetings with ECan staff on 16 January 2025, 14 August 2025 and 2 April 2026. Ongoing email exchanges regarding ECan standard condition set and specific regional planning matters.	Pre-application meeting minutes and feedback (**Appendix 3**).
Waimakariri District Council	Meetings with Council officers on 23 January 2025, 30 May 2025 and 30 April 2026. Email exchanges with the District Council regarding aspects of the proposal and draft conditions of consent.	Pre-application meeting minutes (**Appendix 4**).
Department of Conservation	Correspondence with DOC has been via emails and phone conversations.	A DOC pre -lodgement consultation response and a technical response on a draft LMP (**Appendix 5**). Also included in the appendix is a Pattle Delamore Partners Ltd (**PDP**) response to the DOC technical LMP response.
Te Ngāi Tūāhuriri Rūnanga	A pre-application meeting was requested; however, Whitiora Centre (representative of Te Ngāi Tūāhuriri Rūnanga) advised that its preference was to undertake consultation following lodgement.	Pre -lodgement consultation with relevant iwi authorities, hapū, and Treaty settlement entities is included at

		Appendix 6. This appendix also includes correspondence confirming that engagement with mana whenua is to be solely with Whitiora Centre as the representative of Te Ngāi Tūāhuriri Rūnanga Also refer to the cover letter to the application for a further explanation of the records included in **Appendix 6**.
Heritage New Zealand	Meeting with Heritage NZ planner and archaeologist on 11 August 2025 with subsequent email exchanges.	Pre-application meeting minutes and feedback (**Appendix 7**).
Transpower New Zealand Limited	Correspondence with Transpower has been via emails and phone conversations.	Letter of advice specific to the proposal (**Appendix 8**).

Summary of Consultation

Canterbury Regional Council

16. Consultation with ECan has been undertaken throughout the development of the application, including early pre-application engagement, circulation of draft technical material, and ongoing review and response to ECan's technical feedback.

17. ECan provided formal pre-application feedback on the proposed development. This feedback identified the anticipated regional consenting framework and confirmed that the proposal would require a suite of water permits, discharge permits, and land use consents associated with earthworks, stormwater discharges, groundwater takes (including dewatering), wetland modification, and works in waterways.

18. The pre-application and subsequent engagement identified several key technical issues requiring further consideration. These have been subsequently addressed through the preparation and refinement of specialist technical reports supporting the application.

19. Ongoing consultation with ECan is expected to continue post lodgement.

Waimakariri District Council

20. Waimakariri District Council has been aware of the Applicant's development intentions for the site since 2021, when Carter Group first engaged with Council in advance of lodging its private plan change request. The private plan change and subsequent Proposed Plan processes provided both the Council and the Waimakariri District community with an opportunity to understand the proposed development, albeit at a level of detail appropriate to a rezoning request or submission.

21. Consultation with the Council has included several face-to-face meetings with Council officers. Early discussions were necessarily high-level, reflecting Carter Group's primary focus at the time on its Ryans Road Industrial Development Fast-track application.

22. More detailed information, including technical reports and draft subdivision consent conditions, was provided to the Council in late April and early May of this year. High-level feedback was subsequently received in late May.

23. The Applicant will continue to engage with the Council throughout the Fast-track approvals process.

Department of Conservation

24. The Applicant has consulted with DOC in relation to the Wildlife Act authority component of the proposal. Consultation focused on a draft lizard management plan, and DOCs feedback has informed amendments to the draft as detailed in a response memo included with the DOC feedback in **Appendix 5**.

Te Ngāi Tūāhuriri Rūnanga

25. Engagement with Te Ngāi Tūāhuriri Rūnanga has been undertaken through Whitiora, acting on behalf of the Rūnanga, and builds on consultation previously undertaken in relation to the earlier private plan change process affecting the site.

26. A formal consultation letter was provided to Whitiora in June 2025, outlining the proposed Fast-track application, describing the updated proposal, and identifying the key changes since the earlier plan change process. The letter invited feedback, including the opportunity for a hui or site visit, and signalled that further technical material would be provided as it became available. The correspondence also acknowledged and responded to cultural values and recommendations raised during earlier engagement, including matters relating to riparian setbacks and indigenous planting, erosion and sediment control, stormwater management, and the use of Te Ngāi Tahu subdivision and development principles.

27. Following this initial engagement, additional consultation material was progressively provided to Whitiora as the proposal was refined. This included technical reports, draft plans and site management information issued in July 2025, as well as further updates to plans and supporting material as they became available. Whitiora indicated a willingness to review draft material, including preliminary application documentation, and ongoing engagement was maintained through the provision of updated reports and plans.

28. The full suite of draft application material, including specialist reports and drawings, was made available through a shared consultation folder in April 2026. Updates were provided as further reports were uploaded to ensure that Whitiora had access to the most current information available.

29. Whitiora subsequently advised that, due to internal capacity and process considerations, its preference was to undertake a detailed assessment and provide substantive comments following lodgement of the application, rather than during the pre-lodgement consultation phase. Notwithstanding this, the applicant has continued to provide information and maintain an open invitation for engagement, including offers to meet with relevant technical specialists.

Heritage New Zealand

30. Based on an initial meeting, Heritage NZ provided advice aimed at identifying heritage-related risks and guiding the preparation of supporting material for the fast-track application. The advice covers archaeological management expectations, Māori heritage considerations, and potential heritage effects, and is intended to inform assessment, consultation, and mitigation rather than to determine outcomes or provide approvals. The advice informed a subsequent archaeological assessment undertaken by Underground Overground Archaeology.

Transpower New Zealand Limited

31. The Applicant engaged with Transpower in respect of the proposal as it relates to the National Grid. Transpower provided advice on the compatibility of the proposed subdivision with the National Grid, including guidance on development constraints, construction management expectations, and measures required to protect transmission assets and ensure compliance with relevant electrical safety standards. The advice has been used to inform the subdivision design and proposed conditions of consent.

Existing Resource Consents

32. Under section 30(2), the authorised person has notified the Regional Council in writing to identify any existing resource consents of the kind described in section 30(3). In response, the Regional Council has confirmed that there are no existing resource consents relevant to the proposal (see **Appendix 9** for written confirmation).

33. Subsequent correspondence from the Regional Council, as set out in *FTAA Additional Letter (Updated CRC Position Regarding Water Taken and Competing Resource Interests) 1 May 2026*, indicates that while no competing consents were initially identified, further review of technical material has raised questions regarding the proposed dewatering, including whether it gives rise to stream depletion effects and a surface water take.

34. Additional information and technical assessment have since been provided to Environment Canterbury to address these matters. This includes further analysis contained within the dewatering and dust suppression reporting (refer **Appendix 32**), which responds directly to the issues raised. Environment Canterbury has confirmed the requirements of section 30(2) are satisfied at the time of lodgement.

Substantive Application

35. The following approvals are sought under section 42(4)(a) of the Act (resource consents that would have otherwise been applied for under the RMA) for the proposed activity:

- Subdivision consent for 879 residential lots, two commercial lots, allotments to accommodate a retirement village and a polo ground and facilities, and service lots (a non-complying activity).

- Land use consent for future activities, buildings and site improvements (a non-complying activity).

- Land use consent for earthworks, constructing and maintaining wetlands, removal of wetlands, and vegetation clearance within wetlands and rivers and riparian margins (a prohibited activity – due to removal of wetlands).

- Land use consent for activities in the bed of rivers, including culvert removal and installation, reclamation and realignment of rivers (a discretionary activity).

- Water permits for the take and use of water during construction, dewatering, works in waterways, groundwater interception, diversions of waterways, drainage of wetlands, and to establish a community water drinking supply (prohibited activity – due to drainage of wetland).

- Discharge permit for the discharge of construction phase stormwater, dewatering water, minor contaminants, discharge of sediment due to works in waterways and vegetation clearance, and the discharge of operational phase stormwater from a reticulated system (non-complying activity).

- Resource consent for subdivision and change of use is required under the NES Soil due to the presence of soil contamination above the applicable standards in regulation 7 (restricted discretionary activity)

- Resource consent for disturbance of contaminated soil under the NES Soil at volumes possibly higher than stipulated at the applicable standards in regulation 8 (controlled activity)

- Resource consents under the NES Freshwater regulations are required for:

    - earthworks, take and discharge within 100 metres of a natural inland wetland under regulation 52(1) and (2) (non-complying activities),

    - the drainage of a natural inland wetland under regulation 53 (prohibited activity),

    - vegetation clearance and earthworks within 100 metres of a natural inland wetland under regulations 54(a) and (b) (non-complying activity), and

    - reclamation of a rivers under regulation 57 (discretionary activity).

36. In addition to the resource consents described above, approvals are sought for:

    - a Wildlife Act Authority Permit under section 42(4)(h) of the Act for disturbing native lizard habitat and for the capture and relocation of any native lizards[3], and

    - an archaeological authority under section 42(4)(i) of the Act for modification/destruction of an archaeological site being remnants of the pre-existing Ōhoka railway station. Associated with this authority is an application to nominate an archaeologist for approval to carry out the activity (see section 42(9)(b) and clause 7 of Schedule 8 of the Act).

[3] A lawful authority for an act that would otherwise be an offence under the Wildlife Act.

37. The application complies with the requirements of section 43 of the Act. Specifically, the application:

- is lodged in the form and manner approved by the Environmental Protection Authority,
- is consistent with the purpose of the Act, given it is a development project with significant regional benefits as demonstrated in the Applicant's previous application to be included as a listed project,
- does not involve any ineligible activities as defined in section 5 of the Act,
- complies with the requirements prescribed at schedules 5, 7 and 8 of the Act relating to resource consents, wildlife approvals and archaeological authorities, and
- contains the relevant information required by section 13(4).

Owners and Occupiers of Adjacent Sites

38. The Act 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.

39. The contact details for adjacent owners and occupiers (where able to be identified) are attached in **Appendix 10**.

The Site and Surrounding Environment

Site Details

Addresses	Parcels	Titles
531 & 535 Mill Road, 325 & 347 Whites Road, and 236 Bradleys Road Ōhoka	Lot 1, 2 & 3 Deposited Plan 318615, Lot 2 and Part Lot 1 Deposited Plan 8301, and Lot 2 Deposited Plan 61732 Area: 154.4179 ha	72971, 72972, 72973, CB19B/21, and CB36C/1075

40. The site is currently owned by Peter Sherriff and HC Trustees 2010 Limited, Rhonda Sherriff and HC Trustees 2010 Limited (535 Mill Road, 325 & 347 Whites Road, and 236 Bradleys Road) and Carter Group Waimakariri Limited (531 Mill Road). The Applicant has all the relevant titles under contract to purchase (besides 531 Mill Road, which is owned by a subsidiary company to the applicant). The records of title of site are included in **Appendix 11**.

Site Description

41. The land that is the subject of the application is indicated on the aerial photograph in **Figure** 2 and on the site map included in the masterplan document appended to an urban design and landscape assessment (**Appendix 23**). It is approximately 154 hectares in area and is bounded in large part by Bradleys Road, Mill Road and Whites Road. The southwestern boundary extends between Bradleys Road and Whites Road roughly 1.5 kilometres from the Mill Road end.

42. For the most part, the current land use of the site is a dairy farm with the farmhouse and farm buildings in a cluster towards the western corner and an additional cluster of farm buildings near the boundary with 531 Mill Road. Open paddocks predominate, but the site comprises a variety of mature trees and shelterbelts. A high water table extends over the site and several waterways, including Ōhoka Stream and the Ōhoka South Branch, flow in an easterly direction. Roughly 350 metres from the farmhouse is another more recent dwelling situated next to a pond mostly surrounded by mature vegetation. The pond is fed by one spring, while another spring nearer to Bradleys Road drains through a channel within the site.

43. Another notable feature is the 66kV National Grid electricity transmission lines (Islington – Southbrook A (ISL-SBK-A)) that run through the western part of site. The lines start at the Islington Substation in Christchurch and extends through the Christchurch, Waimakariri and Hurunui districts.

44. A recorded archaeological site (M35/1875) is located in the northern part of the site close to the boundary with 334/344 Bradleys Road and 547 Mill Road. M35/1875 is the site of the pre-existing Ōhoka railway station (site M35/1875) which was part of the Eyreton Branch railway line. The line began near Kaiapoi and was extended as far as Bennetts Junction in 1878 to connect with the Oxford Branch. Gradual closures began in 1931, and the final section from Wetheral to Kaiapoi was shut down in 1965. In Ōhoka, the line

followed Mill Road, crossed paddocks to the station within the site, and then continued southwest along Bradleys Road to West Eyreton as shown in the 1940-44 aerial image in **Figure 3**. The red dashed line in **Figure 4** shows the alignment through the present-day site. Further detail in respect of this archaeological site is contained within an archaeological assessment prepared by Underground Overground Archaeology (**Appendix 12**).

Figure 2: Aerial image indicating the site and locality
Source: Toitū Te Whenua (LINZ)

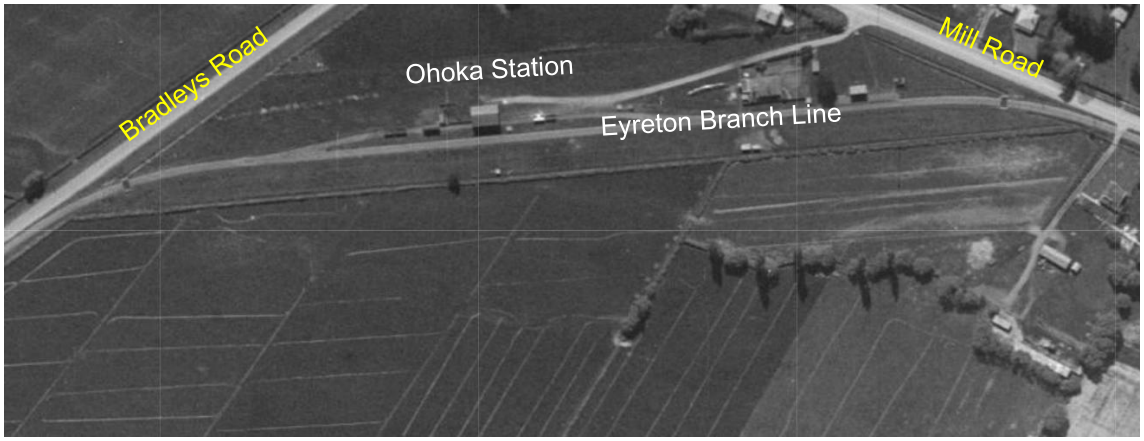

Figure 3: 1940-44 aerial image showing Eyreton Branch railway line
Source: Canterbury Maps

Figure 4: Present day aerial image
Source: Canterbury Maps

45. As described in the detailed site investigations prepared by Tetra Tech Coffey and EHS Support (**Appendix 13**), the wider site is generally free of contamination but does contain some contamination in soils associated with the northern and central buildings, the former railyard, burn piles and in farm dump areas.

46. The features of the site and surrounds are further described in the various expert reports that accompany and form part of this application.

Description of the Ōhoka Settlement and Context

47. The Ōhoka settlement was founded as a mill town in the mid 1800's. By the mid to late 1800's Ōhoka was a thriving settlement with a school, a hotel and a number of shops and businesses clustered around the T-junction at Mill and Whites Road. These formed the nucleus of a small community, and several of the buildings are visible today including the community hall and the Gate Keeper's House, which has been preserved and relocated to Ōhoka Domain. Due to improvements in logistics, local milling was in decline by the mid 1900's and much of the population moved to other centres. The settlement's growth stalled relative to neighbouring centres. The land has primarily been used for farming with lifestyle blocks and smaller residential lots developed more recently.

48. The current settlement, which immediately adjoins the site, comprises a core confined within the north and south tributaries of the Ōhoka Stream with residential development beyond hidden behind mature vegetation. The 2023 Census population count for Ōhoka was roughly 450 people[4]. This included residents who live on lifestyle blocks close to

[4] This figure was arrived at by adding up the population counts of meshblocks 2455602, 4018634, 4018635, 2455602 and including the northern half of 2455708.

Settlement and Large Lot Residential zoned land at Ōhoka. The 2023 population for the entire Mandeville-Ōhoka area was 3,730.

49. Commercial activities are currently limited in Ōhoka with only one business providing day-to-day type goods and services for the local population. This is the Ōhoka GAS service station with automotive servicing and attached dairy which is located on the corner of Mill Road and Whites Road opposite the Domain. Other commercial operations in the settlement include WaterForce, an irrigation company located adjacent the site at 530 Mill Road, Waimakariri Dental Centre at 475 Mill Road, Lithoprint Graphics at 469 Mill Road, and Baby Kulture Handknits (temporarily closed) also on Mill Road.

50. Ōhoka Domain is a notable feature of the settlement and is the venue for a popular Friday morning farmers market. Occupying over six hectares, the domain includes car parking, tennis courts, a playground, picnic and barbeque facilities, a children's bike track, public toilets, and a pavilion available for hire.

51. Local recreational facilities also include the Ōhoka Stream Walkway which runs along the true left of Ōhoka Stream from Bradleys Road to Keetly Place, and the walkway through Ōhoka Bush at the southern end of the Domain.

52. The road environment through the settlement is generally slow speed owing to the presence of parked cars, a general lack of road markings and narrow carriageways. This is despite a posted speed limit of 60km/h in the immediate vicinity of the settlement and 100km/h beyond.

53. Ōhoka School, which includes a sports and event centre available for wider community and corporate use, is located on Jacksons Road roughly 1.5 kilometres from the intersection of Whites Road and Mill Road. The site is within the Ōhoka School zone.

Surrounding Environment

54. The block bounded by Whites, Mill, Jacksons and Tram roads to the east of the site is predominately comprised of rural lifestyle properties. Rural lifestyle and rural residential development proliferate to the southeast of the site throughout the Mandeville area which is centred around a small local commercial centre with offerings that include a bar, restaurants, a small supermarket, a hair and beauty salon, a preschool, a fuel station, and a rural and rural lifestyle equipment hire business.

55. Rural land use predominates to the west of the site, and to the north beyond the Ōhoka settlement. Local industry includes the Canterbury Pet Food Company southwest of the site at 166 Bradleys Road.

56. Ōhoka is close to the district's urban centres including Rangiora, and Kaiapoi. The distance by road from Ōhoka to the centres of Kaiapoi and Rangiora is approximately 9.2 and 9.5 kilometres respectively, a journey that takes about 10 minutes by car or 20-30 minutes on a bicycle.

57. Christchurch, the main employment centre for the district, is also close to Ōhoka via State Highway 1 which is accessed via primary collector roads (Bradleys Road and Mill Road) and district arterial roads (Tram Road and Ōhoka Road). A car journey to central

Christchurch takes approximately 25 minutes depending on traffic. Further, park and ride facilities are available at Kaiapoi and Rangiora for public transport services to Christchurch.

58. Existing infrastructure in the surrounding area is described in the infrastructure report (**Appendix 14**) prepared by Inovo Projects (**Inovo**) and in the integrated transport assessment (**Appendix 15**) prepared by Novo Group.

59. The eastern part of the district, including Ōhoka, is part of the Greater Christchurch sub-region and urban environment identified in the Canterbury Regional Policy Statement (**RPS**). Further, the extent of the Settlement Zone at Ōhoka is identified as an 'existing urban area' in the RPS.

Environmental Site Features

Soils

60. Reeftide Environmental & Projects Ltd has prepared an assessment of the impact of the project on the productive capacity of the land and soils (**Appendix 16**). The report describes the soils at the site as predominantly poorly drained, with 98% classified as having poor to very poor drainage and moderate to slow permeability. This is consistent with the high groundwater levels.

61. LUC classifications range from Class 1 to Class 8, with classes 1–4 considered arable and classes 5–8 non-arable. Versatile soils fall within classes 1 to 3. Mapping from Canterbury Maps and Landcare Research shows that the site contains 2.86 hectares of Class 2 soil and 151.56 hectares of Class 3 soil. The dominant limitation across the site is soil wetness, indicated by the 'W' subclass in the LUC classification. Although the soils are theoretically suitable for a wide range of arable uses, their productivity is constrained by wetness, and drainage improvements would be necessary to fully realise their potential.

Geology

62. PDP has prepared a groundwater assessment (**Appendix 17**) which describes the hydrogeology and geology of the site. The PDP report also summarises the soil information, noting that the site consists predominantly of Ayreburn moderately deep clay, with Ayreburn deep clay in the north and Leeston shallow clay in the south (all poorly drained). The report references a geotechnical report prepared by Tetra Tech Coffey (**Appendix 18**). The findings of this report note that investigations encountered silt, clayey silt and silty sand to depths of 0.6 to 1.5 metres below ground level (**mbgl**), and sandy gravel below this.

Surface Water and Groundwater

Groundwater

63. The hydrogeology of the site is outlined in the PDP hydrology assessment (**Appendix 20**) and summarised below.

64. Long term groundwater monitoring has occurred at the bore located on site (M35/0596). The record from M35/0596 shows that the groundwater level at this site is generally shallow, with an average value of 0.64mbgl. It is noted that bore M35/0596 is close to spring M35/7485 (mapped location is 20 metres away) and this may contribute to higher groundwater levels in this part of the site than observed in other areas. Groundwater levels are generally highest in winter/spring and lowest in summer/autumn.

65. Groundwater has more recently been recorded by 23 new shallow piezometers installed in 2025. The monitoring from March 2025 to April 2026 show groundwater levels that vary spatially across the site from approximately 0.01 to 2.28mbgl with the site considered to have a shallow water table. The shallowest groundwater levels were measured on 2 May 2025, with the highest levels occurring at the piezometers installed near springs or streams.

66. The groundwater beneath the site is comprised of infiltrating rainwater and some seepage losses from the Ashley and Waimakariri rivers.

67. The two springs (northern M35/7485 and southern M35/7487) on site are regional groundwater discharge points, with the springs being predominantly rainfall derived. Additionally, a third spring has been identified creating a groundwater seep. The surface confining layers of the springs consist of:

- Northern Spring M35/7485 – 0.4 metres thick – silt and sandy silt
- Southern Spring M35/7487 – 0.9-1.2 metres – silt, silty sand to sandy silt and peat.
- Groundwater Seep – 0.5-0.6 metres – silt and silty sand.

68. The occurrence of heavy soils and springfed waterways indicates that this site is located within a groundwater discharge zone, meaning that groundwater is discharging into surface waterways.

69. The site is within the Eyre Groundwater Allocation Zone and is within an area of unconfined or semi-confined aquifers, as defined in the LWRP.

Springs and Surface Waterbodies

70. An aquatic ecology assessment has been undertaken by Instream Consulting (**Appendix 19**) which identifies the waterbodies on the site and describes the ecological values of these waterbodies. The key waterways identified in **Table 2** (and in the ecology assessment) provide the specifics of the various waterbodies.

71. The site is highly modified and is currently used for dairy farming, with irrigated pastures. The pasture areas drain directly into wetlands, drains and waterways on site.

72. The waterways that traverse the site are not identified as Salmon or Inanga spawning areas or critical habitat under the LWRP classifications.

73. The ecology assessment references a previous fish survey undertaken on the site in 2021 by Aquatic Ecology Limited. This survey identified four fish species within the site including the longfin eel (Anguilla dieffenbachia), shortfin eel (A. australis), introduced brown trout (Salmo trutta) and upland bully (Gobiomorphus breviceps). Of these, only the longfin eel has a conservation status of nationally declining.

74. The fish survey did not identify the critically endangered Canterbury mudfish (Galaxias burrowsius) at the site. No benthic macroinvertebrate or large invertebrate (koura or kakahi) surveys were undertaken during the Aquatic Ecology investigation.

Table 2: Waterways on site or adjoining the site

Name	Identification	Ecological Value	Comment (refer to Appendix 19 for further detail)
Ōhoka Tributary	River – Spring-fed Plains (Canterbury Maps identification)	High	Highest baseflow of watercourses within the site, clean, gravel bed substrate and recorded trout spawning and good quality habitat with longfin and shortfin eel and bully

			recorded, Major tributary of the Ōhoka stream. Currently has minimal stream setbacks with no native riparian planting.
South Ōhoka Branch	River – Spring-fed Plains where it exits the site (Canterbury Maps identification)	High	Upper west section does not have permanent flow, low baseflow. The eastern / lower reaches have gravel substrates with fish recorded in perennial reach (including longfin eel). The lower reach considered suitable for trout spawning.
Spring mapped on ECan online database	Northern Spring (ECan reference M35/7485) - Canterbury Maps identification)	Moderate	Artesian permanent spring. High potential for ecological values however currently impacted by land use
Spring mapped on ECan online database	Southern / Central Spring (Ecan reference M35/7487 - Canterbury Maps identification)	Moderate	Two large deep ponds at the head of the spring, the western pond is modified and landscaped with an earthen dam acting as a weir. The eastern pond is spring fed with a more natural state with mature exotic trees.
Northern Spring Channel	Stream - Not mapped - M35/7485 is the source for the Northern Spring Channel.	Moderate	Highly modified natural channel with flow from spring head. Limited riparian habitat. Potential for groundwater seep habitats to be enhanced.
Southern Spring Channel	Drain/stream - M35/7487 is the source for the Southern/central Spring Channel Waterway. There is a constructed pond at the southern spring head.	Moderate	Channelised waterway with low flow, some fish species recorded.
Groundwater seep	There is a seep between Ōhoka Tributary and the Northern Spring channel (from an un-referenced spring)	Low	Due to the value of groundwater seep habitats and presence of upland bully within the channel, this feature has the potential for enhancement from its current state. This has limited baseflow.
Unnamed Drain 1 - Overland drainage path across the south of the site	Drain /modified natural watercourse	Low	Shallow drainage channel, standing water, no flow. No fish recorded and limited ecological values.
Unnamed Drain 2 – Central Ponded drain	Drain /modified natural watercourse	Low	Ephemeral, channel considered to drain runoff during rainfall. No fish recorded and limited ecological values.

Unnamed Drain 3 – north-east drain	Drain /modified natural watercourse	Low	Shallow drainage channel, no flow. No fish recorded and limited ecological values.
Southern boundary drain (unnamed stream)	Spring-fed Plains (Canterbury Maps) Drain /modified natural watercourse	Low	Shallow drainage channel, no flow (dry), apart from two shallow ponded areas (when surveyed). No fish recorded and limited ecological values.
Whites Road Drain	Watercourse channel	Low	Collects flow from smaller watercourses on site that do not directly have a culvert under Whites Road. There are reaches of the drain with no permanent flow.
Unnamed Dry Drain (south-eastern drain along boundary)	Drain /modified natural watercourse	Low	Shallow drainage channel, standing water, no flow.

75. Surface water flows were measured in February 2025 (see the hydrology assessment at **Appendix 20**). For Ōhoka Tributary the flow gains from groundwater were recorded as 11.4 L/s upstream and 14.9 L/s downstream. The Ōhoka South branch was dry at upper reach with flow commencing approximately 600 metres downstream and had a flow of 17.8 L/s at a downstream gauge on site demonstrating that the flow originates from groundwater.

76. The Northern Spring had a flow of 1.6 L/s immediately downstream of the spring and further downstream had a flow of 7.4 L/s. The southern spring channel had a flow of 4.6 L/s and downstream flow of 3 L/s which possibly indicates flow loss to groundwater. The groundwater seep spring also indicates a possible loss to stream flow with 2.5 L/s flow by the spring and 1/8 L/s downstream. The flow gauging was undertaken in summer and therefore further seasonal gauging should be undertaken.

Wetlands

77. A wetland delineation and assessment (**Appendix 21**) has been undertaken by PDP. A total of 15 locations were identified as potential wetland habitats with hydrophytic vegetation noted following a field assessment. The wetland extent totalled 4.29 hectares. The wetlands are generally considered to be in a degraded state due to the use of the site for grazing.

78. The report also noted that there may be ephemeral wetland on site however the ephemeral wetland values are likely to be low. See **Appendix 21** for further details regarding the wetlands and species of hydrophytic plants.

79. The updated Aquatic Ecology Assessment (Appendix 19) assesses the wetlands as having low to moderate ecological value, with an overall rating of moderate reflecting the presence of higher value components. The wetlands are generally degraded as a result of historic and ongoing farming activities. However, areas of higher ecological value are associated with the spring systems and permanent streams.

Flooding Environment

80. PDP prepared a flood report (**Appendix 22**) to assess the flood effects of the proposed development. The assessment utilises hydraulic modelling that was calibrated and validated against three significant historical flood events within the area to assess potential flood events under pre-development and post-development conditions.

81. Existing flood characteristics indicate flood depths within defined watercourses exceeding 300-500mm with out-of-bank flood plain flow originating from upstream catchments resulting in shallow floodplain inundation.

82. The modelling undertaken by PDP indicates that for a 500-year Average Recurrence Interval (**ARI**) event, flood hazard across the development site as predominantly 'Low' (H1 classification from *Australian Rainfall & Runoff: A Guide to Flood Estimation*) outside of defined channels. The site and wider area are subject to overland flow and floodplain inundation during significant rainfall, but unlike areas north of Mill Road, it is not expected to have a higher flood hazard classification.

Water Quality

83. The aquatic ecology assessment (**Appendix 19**) refers to a downstream ECan monitoring site in the Ōhoka Stream at Island Road as a reference point for surface water quality. The water quality is considered to have elevated nutrient levels associated with farming. This includes nitrate-nitrogen, which can be toxic at high levels, and dissolved inorganic nitrogen, which is the bioavailable form of nitrogen for plant growth. Five-year median nitrate-nitrogen concentration is 4.02mg/L, which is above the LWRP Plan Change 7 target of 3.8mg/L and the National Policy Statement for Freshwater Management (**NPS-FM**) national bottom line of 2.6mg/L. The faecal bacteria E. coli is also elevated above guideline levels, with the 5-year median count at 893.5 cfu/100 ml, compared to the Plan Change 7 freshwater outcome value 9 of 130 cfu/100 ml and NPS-FM national bottom line of 260 cfu/100m.

84. Samples were collected at key waterways on 4 February 2025. Nitrate-nitrogen generally exceeded the NPS-FM national bottom line and the LWRP Schedule 8 limits (noting these limits are annual median and not one-off samples). Dissolved reactive phosphorus also exceeded NPS-FM limits at downstream samples.

85. As anticipated given the existing farm use, the existing water quality of surface water is currently adversely affected by agricultural runoff of sediment, nutrients and E.coli.

86. The dewatering and dust suppression assessment (**Appendix 32**) details the representative groundwater sampling that has been undertaken. Samples were taken in July 2025 from the shallow groundwater monitoring bores. The samples were analysed for dissolved metals (groundwater samples) and total metals (surface water samples), nutrients, PAH's and Total Petroleum Hydrocarbons. The laboratory results indicate that at some testing locations there are elevated dissolved metals that exceed the LWRP Schedule 5 limits.

87. The water supply strategy (**Appendix 29)** refers to groundwater quality from the drilling of bore BW24/0292 in June 2015. The available water quality information indicates that the source of water from BW24/0262 is generally suitable for a public drinking-water supply.

Water Users

88. A description of the water users in the area is provided in the groundwater assessment prepared by PDP (**Appendix 17**). There are two existing District Council community water supply bores BW24/0262 and M35/5609. The current Ōhoka reticulated water supply owned and operated by the District Council has approximately 124 connections based on the Council's Activity Management Plan 2024 and is principally sourced from bore BW24/0262 (District Council reference Ōhoka Well No. 2). Bore BW24/0262 has a screened intake zone from 78.0 to 84.0mbgl.

89. There are five existing shallow bores located on the site which are authorised by the following resource consents to take groundwater for irrigation purposes:

- Resource consent CRC991022 authorises abstraction via bores M35/9423 (30 metres deep), M35/3064 (12.5 metres deep) and M35/3065 (12 metres deep). The consents authorise up to 60L/s from three shallow bores in the south of the site.

- Resource consent CRC991827 authorises abstraction via bores M35/0326 (13.7 metres deep), M35/0367 (9.4 metres deep). The consents authorise up to 45.6 L/s from two shallow bores in the north of the site.

90. Resource consent CRC166054 authorises abstraction via deep supply bore BW24/0262, as the primary township supply bore for Ōhoka, with the same rate and volume restrictions that are provided in CRC990932 (backup bore M35/5609). The consented rate/volume is 18 L/s maximum instantaneous rate and an annual volume limit of 248,030 m^3. There are no flow restriction conditions placed on CRC166054, which is expected to be the result of the deeper screen zone in BW24/0262 and a lower hydraulic connection with surface water. A Community Water Supply Protection Zone applies to BW24/0262.

91. There are 514 bores located within a two-kilometre radius of the site (as per the ECan online wells database in Canterbury Maps), with 393 recorded as active and existing, including an ECan groundwater level monitoring bore M35/0596.

Figure 5: Wells, bores and community drinking water supply
Source: Canterbury Maps

Vegetation

92. DCM Urban Design (**DCM**) have prepared an urban design and landscape assessment (**Appendix 23**). As part of this assessment a high-level review of existing vegetation on site was undertaken noting that vegetation across the site is predominantly exotic species with small areas of native species near waterways, such as along Ōhoka Tributary and the southern spring head, as well as along some paddock fence lines. There are established trees on site used as shelter belts including Pinus radiata, Cupressus macrocarpa and Eucalyptus.

93. A tree survey was undertaken in 2023 by Tree Tech and the survey is summarised in the DCM report. A total of 2,033 trees were surveyed on site. The location of trees on site is shown on the tree survey plan within the masterplan in the urban design and landscape assessment (**Appendix 23**).

Terrestrial Ecology

94. PDP undertook lizard habitat surveys in late November 2024 which found habitat within the site that would potentially support a lizard population (see **Appendix 24** for the lizard habitat assessment memo). In accordance with the recommendations of the assessment, baseline lizard surveys were undertaken over the period 31 March to 3 April 2025. The survey resulted in the trapping of 14 native lizards, 12 of which were Southern grass skinks and two unidentified lizards which were also likely Southern grass skink (see **Appendix 24** for the survey report).

95. No other terrestrial ecological values have been identified.

Avifauna Ecology

96. PDP undertook avifauna survey in late May 2026 which identified 13 species at the site (see **Appendix 25** for an avifauna memo). PDP advised that the limited amount of bird habitat on site is of low ecological significance.

Proposal

Description of the Proposal

97. The proposal is a master-planned expansion of the existing Ōhoka settlement involving the subdivision and development of approximately 154 hectares of rural zoned land. Commercial activities and recreational facilities are proposed alongside residential activities.

98. The key urban design drivers that underpin the proposal include:

Leveraging and enhancing natural assets by:

99. recognising and retaining the natural hydrology of the site including naturalising the existing waterways,

100. protecting the waterways and local springs through building setbacks and landscaped margins,

- retaining the existing tree cover and shelterbelts where practical,
- creating new landscape margins to waterways with a focus on tree planting,
- introducing native plant species within stormwater management areas to add to the biodiversity of the site, and
- using extensive landscaped areas to offset the introduction of impervious surfaces.

Building community by:

- providing opportunities for people to live and work in Ōhoka,
- assisting in the creation of a village centre around the historic setting of Mill / Whites intersection and the domain,
- providing opportunities for commercial and community facilities to be integrated in the village centre,
- creating streetscapes that are reflective of the character of the settlement, and
- allowing for the growth of the settlement through incremental staged development.

Enhancing connectivity by:

- providing high quality amenity for all internal connections to support pedestrian and cycle movement,
- using the naturalised waterway margins and new green links throughout the site,
- creating a positive interface on Mill Road along the village centre, and

- creating a new direct interface with the domain.

Allotments

101. The subdivision plan is contained in **Appendix 26**.

102. The site is proposed to be subdivided into 879 residential allotments[5], ranging from 425m^2 to 4,013m^2 in area. Lots 27 and 314 contain existing dwellings proposed to be retained. All other existing buildings would be demolished as part of subdivision works. A large allotment towards the northeast of the site (Lot 9001) is proposed to accommodate the establishment of a retirement village comprising up to 250 units. The proposed subdivision achieves a residential density of 8.6 households per hectare.

103. In addition to the residential allotments, two super lots (lots 3000 and 3001) covering 1.5 hectares are proposed to accommodate the new local centre including the establishment of an off-street car parking lot to serve future commercial activities.

104. A 7.5-hectare allotment (Lot 9003) is proposed to accommodate a polo ground and associated facilities.

Staging

105. The proposed subdivision would be carried out in the following stages as indicated on the subdivision plan commencing with Stage 1 and followed thereafter in any order subject to the appropriate servicing of each stage:

    a. Stage 1 comprising:

        i. 100 residential lots,

        ii. three commonly owned access lots (**COAL**),

        iii. two commercial super lots,

        iv. one lot to vest as recreation reserve,

        v. two lots to vest as esplanade reserve,

        vi. one lot for the wastewater pumpstation,

        vii. one lot to vest as road, and

        viii. four lots to vest as local purpose reserve (for stormwater management).

    b. Stage 2 comprising:

        i. 118 residential lots,

        ii. three lots to vest as recreation reserve,

        iii. two lots to vest as esplanade reserve

[5] We note that several of the technical reports appended to this document reference 875 residential allotments.

iv. and two lot to vest as road.

c. Stage 3 comprising:

i. the retirement village lot,

ii. one lot to vest as recreation reserve, and

iii. one lot to vest as road.

d. Stage 4 comprises:

i. 92 residential lots,

ii. one COAL,

iii. two lots to vest as recreation reserve, and

iii. two lots to vest as road.

e. Stage 5 comprises:

i. the polo field lot, and
ii. one lot to vest as road.

f. Stage 6 comprises:

i. 94 residential lots,

ii. two COALs,

iii. two lots to vest as recreation reserve,

iv. two lots to vest as road, and

v. one lot to vest as local purpose reserve (for stormwater management).

g. Stage 7 comprises:

i. 147 residential lots,

ii. four COALs,

iii. seven lots to vest as recreation reserve,

iv. two lots to vest as road, and

v. two lots to vest as local purpose reserve (for stormwater management).

h. Stage 8 comprises:

i. 102 residential lots,

ii. one COAL,

iii. two lots to vest as recreation reserve,

iv. two lots to vest as road, and

v. one lot to vest as local purpose reserve (for stormwater management).

i. Stage 9 comprises:
    i. 114 residential lots,
    ii. two COALs,
    iii. three lots to vest as recreation reserve,
    iv. two lots to vest as road, and
    v. one lot to vest as local purpose reserve (for stormwater management).

j. Stage 10 comprises:
    i. 40 residential lots,
    ii. one lot to vest as recreation reserve,
    iii. two lots to vest as road, and
    iv. one lot to vest as local purpose reserve (for stormwater management).

k. Stage 11 comprises:
    i. 72 residential lots,
    ii. four lots to vest as recreation reserve, and
    iii. one lot to vest as road.

Easements

106. Service easements are proposed to be created as required.

107. Two easement instruments (Deed Instruments 52390 and 52396 created in 1879) require the current landowner to keep Ōhoka Stream clean and clear for flood management purposes for the benefit of the Eyreton Road Board. The District Council has inherited the beneficial rights of the Eyreton Road Board when it was disestablished. The surrender of these instruments is required to enable vesting of roads where they cross the waterway. The surrender of easements will not result in any loss of the District Council's ability to manage and maintain the stream, given the margins of the stream will be vested as esplanade reserve. The District Council will continue to be able to manage the waterway corridor.

108. A Right to Drain Water easement (Instrument (EC) 717781.2) granted to the neighbour to the north (being Lots 1 and 2 DP 83609 owned by Union Specialties (NZ) Limited) is actively used by this party. The easement runs across Stage 11 of the subdivision. The Applicant will negotiate with the owner to reroute the drainage channel to accommodate the subdivision plan. The current easement would be surrendered and a replacement easement created. Given the affected land is in final stage of the subdivision, there is ample time to complete that process.

Reserves

109. Reserves are proposed as specified in paragraph 105.

Future Land Use

110. The rural zoning of the site does not anticipate the urban development and activities that this application seeks to provide for. Therefore, approval is sought to enable future land use within the proposed residential, retirement village, commercial and polo ground allotments as follows:

111. All the provisions of the POWDP would apply to permitted use and development of lots 1-205, 207-547 and 553-762 as if those lots were zoned General Residential.

112. All the provisions of the POWDP would apply to permitted use and development of lots 548-552 and 763-880 as if those lots were zoned Large Lot Residential except that subclause 1.a. of rule LLRZ-BFS6 would not apply to lots 871-880. This rule requires a road setback of 10 metres which would be reduced to 5 metres accounting for restrictions relating to the National Grid that affect these allotments.

- The establishment of a retirement village[6] containing up to 250 units would be a permitted activity within Lot 9001 subject to the POWDP General Residential Zone built form standards except the building coverage restriction required by rule GRZ-BFS2. All other district-wide provisions of the POWDP would apply to the development of the retirement village as if Lot 9001 was zoned General Residential.

- All the provisions of the POWDP would apply to use and development of lots 3000 and 3001 as if those lots were zoned Local Centre except the retail activity floor area restriction required by rule LCZ-R4 (Retail activity) would not apply. Instead, retail activity floor area would be limited to a maximum of 9,000m^2 GFA.

- The establishment of a polo field and ancillary activities and facilities would be a permitted activity within Lot 9003 subject to the POWDP Sport and Active Recreation Zone built form standards and all other provisions of the POWDP as if Lot 9003 was zoned Sport and Active Recreation. For the purpose of the proposal, ‘polo field and ancillary activities and facilities’ means the use of land and buildings for the purposes of participating in or viewing polo and activities associated with recreational and competitive polo, whether a charge is made for admission or not. It includes, but is not necessarily limited to:

    i. a polo playing field with goal posts, sideboards and line markings,

    ii. stables, equipment storage and a horse exercise area(s),

    iii. maintenance facilities,

[6] As defined in the POWDP and National Planning Standards

iv. a clubhouse,

v. spectator amenities and viewing facilities, and

vi. parking, loading and manoeuvring areas.

113. The above is articulated in the proposed consent conditions. Future landowners would avoid the need to obtain resource consents that would have otherwise been required under the provisions of the Rural Zone of the OWDP and/or Rural Lifestyle Zone of the POWDP when establishing activities that:

- are listed as permitted in the relevant POWDP zone (as set out above), and
- comply with the relevant POWDP built form standards, and
- comply with the relevant POWDP district-wide provisions.

114. In addition to the above, consent is sought for an off-street car parking facility within the local centre to serve future commercial development. Within that parking facility, a publicly accessible EV charging facility is proposed as well as dedicated park and ride spaces should public transport services be extended to Ōhoka. Further, provision for the establishment of a future bus stop and associated shelter within the road corridor separating the commercial allotments should public transport services be extended to Ōhoka.

115. We note that the Applicant was a submitter on the Proposed Plan seeking the rezoning of the site from Rural Lifestyle Zone to a combination of Settlement Zone or General Residential Zone, Large Lot Residential Zone, Local Centre Zone and Natural Open Space Zone. The Applicant has appealed the District Council's decision to decline the rezoning submission. If the appeal is successful, several of the land use consent conditions would likely be rendered redundant. Should this eventuate, an application under section 127 of the RMA would be required to cancel the conditions.

Greenhouse Gas Emission Reduction

116. Measures that would help support the reduction of greenhouse gas (**GHG**) emissions are proposed including:

- extensive tree planting throughout the site,
- prohibition of reticulated LPG,
- establishment of a commercial centre to meet the daily convenience needs of local residents,
- provision of a publicly accessible EV charger in the carpark of the local centre,

117. ensuring future provision for a future bus stop near the local centre,

- ensuring future provision of a park and ride facilities within the local centre car park, and

- establishing an integrated network of cycling and pedestrian pathways.

Services

118. An infrastructure report prepared by Inovo (**Appendix 14**) sets out the following servicing proposal, and the civil engineering plans are included at **Appendix 27**.

Power, Telecommunications and Streetlighting

119. The existing electricity network bordering the site can be extended to provide sufficient power to the development. Electricity is proposed to be delivered to each allotment via a network compliant with utility company and industry standards. MainPower has confirmed that there is existing capacity in the network to accommodate the proposed development (see **Appendix 14**).

120. The existing fibre network in Mill Road is proposed to be extended to individual allotments via an underground network. Enable has confirmed that there is existing capacity in the network to accommodate the proposed development (see **Appendix 14**).

121. Streetlighting is proposed to be provided where required along the internal roads and within reserves in accordance District Council standards. The exact locations and luminaire specifications would be provided at detailed design stage.

Sewer

122. Effluent is proposed to be reticulated to the Rangiora Wastewater Treatment Plant via a local pressure sewer network. All new lots are proposed to be supplied with appropriately sized lateral connections to the wastewater mains.

123. PDP has assessed wastewater servicing options for the proposed subdivision and development (**Appendix 28**). The wastewater proposal involves connecting to the existing Mandeville-Ōhoka wastewater system via a new pump station adjacent to the polo grounds allotment. Key features of the wastewater proposal include:

    - The pump station would link to the Bradleys Road Pump Station and rising main to Rangiora Wastewater Treatment Plant.

    - The existing system has significant unused capacity under normal conditions, but experiences surges during rare groundwater resurgence events.

    - The new pump station would handle up to 30 L/s and service residential allotments and the local centre land, generating 669 m³/day.

    - The proposed system includes 251m³ of buffer storage at the pump station and over 900m³ in household tanks which would manage peak flows during extreme events. The pump station would operate only when the Bradleys Road Pump Station is idle to avoid conflicts.

- Hydraulic modelling confirms compliance with District Council standards and system integrity under normal and emergency conditions.

- The local District Council planned drainage upgrades (Stage 1 in 2026, Stage 2 in 2032) would reduce groundwater impacts and enhance system reliability.

Water

124. Potable water is proposed to be supplied via a new reticulated community drinking water scheme where the existing township supply is unable to service the whole of the development (the existing township supply is proposed to supply the Stage 1 residential lots and commercial areas). The water required to supply the subdivision would come from decommissioning two existing (consented) shallow irrigation bores. The change in land use would result in a net reduction in groundwater abstracted at the site.

125. Compliant fire-fighting water flows can be provided through the proposed community drinking water scheme.

126. The new community water supply would involve a take and use of groundwater to service the proposed residential and commercial development. However, the initial stage of residential development (Stage 1) and the commercial development may be able to be serviced by the existing community water supply for Ōhoka. This water supply is consented under CRC166054 with abstraction via deep supply bore BW24/0262, and is the primary township supply bore for Ōhoka.

127. The taking and use of groundwater for community drinking-water supply purposes requires the establishment of new community supply bores for the remaining stages of the development as the existing supply does not have capacity to service the new development beyond Stage 1 and the commercial development.

128. The water supply assessment (**Appendix 17**) concludes that available water quality information indicates that the source is suitable for use as a public drinking water supply and indicates that the existing township supply has capacity to service Stage 1 and the commercial development subject to discussion with the District Council.

129. It is proposed to install up to five new deep bores for abstracting groundwater. The screen depths would likely be greater than 60mbgl to ensure the best water quality for the supply and to allow for a large drawdown while minimising interference effects on neighbouring bores. Existing irrigation bores on site would be disestablished.

130. The PDP report (**Appendix 17**) advises that the exact number of bores required is yet to be determined, however it is anticipated that four bores, all capable of supplying 12.8 L/s and 921.6m^3/day, would result in a total peak flow rate of 51.2 L/s and daily volume of 3,686.4m^3. This should be sufficient to meet the needs of the subdivision, but depending on the yields of the bores, the final number may alter.

131. A water supply strategy has been prepared by Inovo (**Appendix 29**) consistent with Schedule 25 of the LWRP.

Stormwater

132. Stormwater from impervious surfaces (such as roads and other hard stand areas) during the operational stage within the development area would be collected and drained to stormwater management facilities via road swales or channels. Treatment prior to discharge into natural waterways and drainage channels includes proprietary devices for the commercial lots, and swales to collect runoff from lots and roads draining to a detention basin for lower density residential areas and for the polo field. Higher density residential areas are proposed to be treated via first flush basin and/or wetlands prior to being attenuated in basins.

Proposed Stormwater Management and Discharge

133. A stormwater management report has been prepared by PDP (**Appendix 31**) along with the stormwater plans prepared by Inovo (**Appendix 27**). The information contained in these documents outlines the proposed approach to stormwater for the operational phase of the development including attenuation, treatment and discharge.

134. It is anticipated that this stormwater network will be vested with the District Council. The key to the design approach is ensuring that potential flood effects from the development will be sufficiently mitigated. Additionally, the reporting details the water quality anticipated from the treated stormwater runoff.

135. The stormwater is proposed to discharge to surface water and involves multiple stormwater discharge points across different stages of the development. The stormwater discharge points are identified on the civil engineering plans (**Appendix 27**).

136. There are four pre-development stormwater catchment areas which have been broken down into multiple post-development catchment areas. A summary of the stormwater management is provided in **Table 3** below.

Table 3: Stormwater management catchments

Pre-development catchment	Post-development catchment		Area (ha)	Stormwater treatment	Attenuation	Discharge point
C2	1	Residential	9.4	First flush basin and wetland	First flush basin and wetland	South Ōhoka
C1	2A	Residential	23.4	Swales	First flush basin and wetland	Whites Rd
	2B	Residential	15.3	Swales	Attenuation basin (wet pond)	Whites Rd
C2	3	Residential	9.7	First flush basin and wetland	First flush basin and wetland	South Ōhoka

	4	Residential	9.8	First flush basin and wetland		Whites Rd
C3	5A	Residential	14.3	First flush basin and wetland, raingarden	First flush basin and wetland	Northern Spring channel
	5B	Residential	1.4	Swales	Attenuation basin (wet pond)	Northern Spring channel
	6	Residential /Retirement village	19.4	swales	Residential - Offset storage within catchment 10 Retirement village to be designed to have future internal SMA	Groundwater seep outlet adjacent to Whites Road
C4	8	Residential	3.6	First flush basin and wetland	First flush basin and wetland	Mill Road
C3	9A	Residential	3.0	First flush basin and wetland	First flush basin and wetland	Whites Rd
	9B	Commercial	1.2	Proprietary devices	First flush basin and wetland	Ōhoka Tributary
	9C	Residential	9.4	First flush basin and wetland	First flush basin and wetland	Ōhoka Tributary
	10	Polo fields	8.9	N/A	Offset storage within polo field	Discharge via road network to Catchment 6
C4	11	Residential	1.9	Raingardens	Off-set storage within catchment 8	Mill Rd

137. The proposed stormwater management strategy for the site is comprised of the following:

138. Internal road and right of ways are designed with kerb and channel to convey most of the stormwater runoff via a piped reticulated network to stormwater facilities. This infrastructure would accommodate the 20% Annual Exceedance Probability (**AEP**) runoff event inclusive of climate change in the residential areas, and 10% AEP for commercial areas

- Run-off from catchments 2A, 2B, 5 and 6 would be directed to swales rather than kerb. Raingardens and proprietary devices would be used for residential areas and the commercial area respectively.

- The stormwater run-off has been designed to be managed so that it does not exceed the pre-development run-off. This is to be achieved through attenuation to limit the flow at each downstream discharge point to pre-development conditions. The attenuation and flood storage would be provided by basins (first flush or attenuation basin) and treatment wetland storage.

- Attenuation for up to the 2% AEP from the developed site is to be provided through the primary system. Details of the SMA sizing is provided in the stormwater management report (**Appendix 31**). The SMA's are sized for their associated catchment and have available storage determined based on seasonal groundwater depth.

  Discharge would be controlled from the basins by means of an outlet structure which is set at a height exceeding the highest anticipated groundwater level to ensure any wet basins, or wetlands are not drained, except for stormwater. The design is such that, up to a 2% AEP event, the post-development contributing flow to the waterway would be no more than the existing pre-development flow.

  Instream attenuation volume is to be retained and compensatory storage along the flow path corridor is to be provided through the benching of the riverbanks (for Ōhoka Tributary).

- Overland flow paths would be utilised to convey the 2% AEP event stormwater flows along the road network and within dedicated easements.

Stormwater Treatment

139. Proposed stormwater treatment includes:

    - First flush detention basins and wetlands would be used to capture and to treat the first 25mm of rainfall for the majority of the site (26.7ha), with controlled discharge to drainage corridors and streams

    - In some residential areas where there are space constraints, stormwater would be treated via swales prior to discharging to attenuation basins. The swales provide conveyance and treatment prior to downstream attenuation.

    - High-infiltration rain gardens (including proprietary systems such as Filterra®) are used where swales are not feasible, particularly to treat road runoff and accommodate shallow groundwater conditions. Treatment swales and raingardens comprise 14.9ha of the development area.

    - In areas of higher contaminant loading, proprietary treatment devices would be used to remove gross pollutants, sediments, hydrocarbons, and heavy metals Approximately 1.2ha would be managed by proprietary devices.

    - The stormwater treatment has been designed with reference to the requirements of:

        - Christchurch City Council's Waterways, Wetlands and Drainage Guide,

- Waimakariri District Council's Engineering Code of Practice, and
- Canterbury Regional Council LWRP.

- Once treated the stormwater would then discharge at an outfall. The outfall discharge points are into surface water, namely Whites Road drain, Ōhoka tributary, Mill Road, South Ōhoka Stream and the centralised spring channel.

140. The stormwater treatment is designed to address the expected contaminants given the change in use from rural to urban. These contaminants include suspended sediments, hydrocarbons and oils associated with vehicle use and heavy metals in trace quantities (zinc, copper, lead).

141. Stormwater discharges from the site are subject to the LWRP. While Schedule 8 applies to discharges from reticulated stormwater systems where contaminants may enter water, it does not specify limits for several key contaminants of concern. Accordingly, Schedule 5 limits have been applied for the purposes of assessing stormwater water quality effects.

142. The applicable water quality standards for the stormwater discharge to a river are set out in Table S5B (Level of Protection %) in and Table s5A (Receiving Water Standards) set out in Schedule 5 of the LWRP. These standards are applicable past the mixing zone in the river. In this instance the mixing zone is in the rivers/waterways, downstream.

143. The Ōhoka Stream and its tributaries are spring-fed waterways and are therefore classified as spring-fed-plains under the LWRP. As such, a total suspended solids (**TSS**) limit of 50 mg/L applies to stormwater discharges to these waterways, with Schedule 5 limits applying to other water quality parameters.

144. The LWRP Schedule 5 95% species protection limits are as per the 'Australian and New Zealand Guidelines for Fresh and Marine Water Quality' 2018. These chronic limits represent a conservative assessment approach, noting that any exceedances would be short-term and infrequent, occurring only during rainfall events and rapidly diluted by upstream flows.

145. The stormwater quality memo (refer to Appendix C in the stormwater management report – **Appendix 31**) details the receiving environment water quality and the expected outcomes from the stormwater treatment, this can be summarised as:

- Baseflow monitoring indicates very high water clarity, with TSS consistently below 3 mg/L, making clarity a key parameter to manage due to its high aesthetic sensitivity. Moderate nitrogen concentrations are present under baseflow conditions, particularly nitrate, reflecting groundwater inputs typical of spring fed systems, with elevated ammoniacal nitrogen downstream likely associated with existing agricultural activities.
- Phosphorus concentrations under baseflow conditions are low and are similar to those predicted to be discharged from the development. Metal concentrations (copper, lead, and zinc) are very low, generally at or below laboratory detection limits and well below relevant LWRP limits, indicating strong dilution capacity during baseflow conditions.

- While contaminant concentrations are expected to increase during storm events, a toxicant mixing assessment confirms that water quality beyond the mixing zone will be appropriately managed, taking into account dilution and elevated stream flows.

- The predicted stormwater discharge quality from the proposed treatment systems demonstrates a high level of contaminant removal across all sub catchments. TSS concentrations are expected to be well below the applicable LWRP limit of 50 mg/L for spring fed plains waterways, with treated concentrations generally ranging from approximately 2–13 mg/L, depending on the treatment method.

- Predicted nutrient concentrations (total nitrogen and total phosphorus) are low and are comparable with, or lower than, existing baseflow concentrations within the receiving environment.

- For heavy metals, treated concentrations of copper and lead are below the relevant LWRP Schedule 5 limits for all treatment systems. Zinc concentrations marginally exceed the Schedule 5 chronic limit across treatment types; however, this is addressed through application of an appropriate mixing zone and consideration of dilution within the receiving waterways, consistent with the LWRP framework. Copper exceeds the chronic limit for swales and detention basins.

- The zinc concentration over a short period of approximately 4 hours with mixing is not expected to meet the LWRP limits within the Ōhoka Stream Tributary. It is expected that after 4 hours sufficient mixing to dilute the contaminant load would occur.

- It is noted that there are various discharge points into the waterways on site, and depending on the characteristics of each waterway the extent of the mixing zones will vary.

Flood Management

146. Flood modelling has been undertaken by PDP (see **Appendix 22**) with the modelled results validated against historical events. The potential flood effects are assessed for surrounding properties, as the proposed development includes the internal reticulated stormwater system to manage stormwater run-off up to 2% AEP.

147. In storm events such as the 0.5% AEP (200-year ARI) there is potential for off-site flooding. Based on the modelling, there is a potential increase in flood levels on properties north of Mill Road predicted to be less than 10mm. No potential flooding for habitable dwellings is expected to increase greater than 20mm, and no critical infrastructure (roads) or cultural/heritage sites are expected to be impacted.

148. To address potential onsite flooding, any new habitable building would achieve a minimum finished floor level in accordance with rule NH-R2 of the POWDP. During large storm events some internal roads would have access restricted however dwellings would achieve flood resilience.

Sub-soil Drainage Take and Discharge

149. It is proposed to install sub-soil drainage. The sub-soil drains would be located beneath all roads, and roadside swales. The drainage is required to ensure the structural integrity of the roads and would be designed in accordance with the District Council Engineering Code of Practice.

150. The subsoil drainage would be positioned on both sides of the road under the kerb and would be comprised of a 160mm outer diameter punched drainage pipe. The pipes would be graded towards the discharge points within the SMAs. PDP has prepared a groundwater assessment (**Appendix 17**) that outlines the expected operation of this system. The report indicates that localised drawdown will occur where groundwater levels are above the pipe inverts, but this would be confined to the immediate vicinity of the drains. The total proposed subsoil drain combined length is estimate at 28.17km. Drains would be installed either within gravel strata or above into less permeable deposits. The drain flow rates are anticipated to be, an average of, 7.8 L/s during periods of high groundwater. However, to account for natural variability and fluctuations in flow, a conservative maximum take is sought based on a design flow limit of 10 L/s.

151. All drainage water collected from beneath the roads would discharge to the SMAs and associated treatment wetlands. In some wetlands which are in areas where the water table exceeds the ground height, groundwater interception is naturally present, and some drainage will occur to these 'daylighted' areas prior to discharging back to ground when the water table lowers. Where the SMAs are dry, drainage water will infiltrate back into the underlying groundwater system via the SMA basins and wetlands.

152. Accordingly, the subsoil drainage system is considered a non-consumptive take of groundwater. Water removed from the subsoil system is retained onsite and returned to the aquifer through passive infiltration. As the SMA outlets are positioned above the highest predicted groundwater levels, no groundwater is discharged offsite. The outlets are designed to only release stormwater during rainfall events when flows exceed storage capacity.

Roads and Access

153. Road links to Bradleys, Whites and Mill roads are proposed via seven new road intersections with priority given to the external road network. The proposed internal road network consists of primary and secondary roads providing access and connectivity. All site access intersections are priority-controlled and include right-turn facilities where required, subject to detailed design and road safety audits. No direct property access is proposed to existing roads surrounding the site.

154. Beyond the site, gateway treatments are proposed at the intersection of Mill Road and Bradleys Road, and on Whites Road at the intersection of Ōhoka Stream.

Internal Transport Network

155. A comprehensive internal road hierarchy is proposed, with corridor widths ranging from 16 metres to 22 metres, designed to function as local residential streets with a 50km/h internal speed environment. The layout includes:

- priority-controlled internal intersections,
- cul-de-sacs with compliant turning heads, and
- a combination of on-street parking, accessways, and rights-of-way.

156. The transport elements are designed in general accordance with NZS 4404.

157. 17 allotments are proposed to be vested as road and 13 COALs are proposed as detailed on the subdivision plan in **Appendix 26**.

Active Modes and Public Transport

158. The proposal provides an integrated internal walking and cycling network, including shared paths on primary internal routes and pedestrian connections between neighbourhoods.

159. Shared paths are proposed along the Bradleys Road, Whites Road, and Mill Road frontages, linking to the District Council's planned walking and cycling network and improving access to Ōhoka School and Ōhoka Domain. Two new pedestrian crossing points are proposed on Whites Road to connect the development with the Ōhoka Domain.

160. While no scheduled public bus services directly serve the site, residents can access park-and-ride facilities at Kaiapoi and Rangiora, and existing school bus services already operate along surrounding roads.

Traffic generation

161. At full development, the proposal is predicted to generate:

- 624 vehicle movements in the AM peak hour,
- 715 vehicle movements in the PM peak hour, and
- 6,046 vehicle movements per day.

162. Traffic generation reflects both standard residential dwellings and lower-intensity retirement dwellings. No specific peak-hour traffic generation has been assumed for the commercial centre or polo grounds, as these are expected to primarily serve local needs and/or operate outside peak commuter periods.

Infrastructure Funding

163. All new or upgraded infrastructure required for no reason other than to accommodate development would be funded by the developer. Otherwise, funding of recommended new and/or upgraded infrastructure is anticipated to be raised, for the most part, through financial or development contributions levied by the District Council on the proposed development and other developments that would benefit from the infrastructure.

164. Development contributions can be levied in respect of projects indicated in the District Council's long-term plan (**LTP**). While several of the recommended infrastructure projects identified in this application are not included in current LTP, the District Council would be

incentivised to include the necessary projects in the next LTP so that it can capture development contributions[7]. If any of the projects need to be delivered earlier than required to respond to growth in the wider network, a developer agreement may be required to enable the works to be implemented without undue delay.

165. Financial contributions provide an alternative or complementary funding mechanism to development contributions. Where development contributions are authorised under the Local Government Act, financial contributions are an RMA tool that can be conditioned under section 108(2)(a). Any condition(s) must be in accordance with the purposes specified in the plan. Further, the level of the contribution must be determined as set out in the plan. Chapters 20 and 34 of the OWDP address financial contributions. If financial contributions are levied, care would be required to ensure that it is not imposed on the development for the same purpose as any development contribution.

The National Grid

166. The proposal has been developed to ensure that the ability of Transpower to operate, maintain, upgrade and develop the National Grid is not compromised by the proposed subdivision and future land use.

167. The subdivision plan has been designed to maintain adequate buildable space clear of the transmission lines within residential allotments proximate to the National Grid. Two lattice tower pylons are situated within the site, both within proposed reserves.

168. The Applicant proposes a suite of consent conditions that:

- Ensure compliance with NZECP 34:2001 and Electricity (Hazards from Trees) Regulations 2003 to prevent electrical hazards from vegetation, buildings, or structures encroaching on safe distances from transmission lines.
- Restrict proximity and height of mobile plant and vehicles near transmission lines during construction and future use to avoid contact with live conductors.
- Control excavation depth and batter stability near support structures to prevent undermining foundations and compromising structural integrity.
- Prevent reduction in conductor-to-ground clearance due to spoil stockpiling.
- Ensure Transpower has unobstructed access to support structures and transmission lines for routine and emergency maintenance.
- Limit vegetation height and proximity to transmission lines to prevent interference, ensure visibility, and reduce risk of trees falling onto lines.
- Ensure future buildings and structures are sited to maintain safe distances and allow operational access, especially in lots directly affected by transmission infrastructure.

[7] Development contributions can be levied at the issue of a subdivision consent, land use consent and/or service connection.

169. Any conditions that require ongoing compliance are proposed to be enforced through consent notices registered on titles.

Earthworks

170. Bulk earthworks are proposed to prepare the ground for the main civil works including construction of the stormwater basins, grading for roads and ensuring suitable engineered fill for residential development. The bulk earthworks volumes and areas include:

- Cut: 123,866m^3
- Fill: 197,431m^3
- Balance: 73,565m^3 (excess of fill over cut)
- Earthworks area: 1,537,076m^2 (153.7076 hectares)
- Maximum excavation depth: 3.6 metres to develop the stormwater management areas, noting that the majority of excavation across the site is less than 0.5 metres for a site scrape.
- Maximum fill depth: 2 metres

171. The earthworks include:

- site clearance,
- stripping of topsoil to stockpile and re-spreading of topsoil from stockpile to re-contour lots and landscape areas,
- cut-to-fill (engineering fill) for levelling/shaping of the residential lots,
- earthworks (excavation) and pavement construction for the proposed future roads,
- trenching within future road corridors for installation of below ground services, and
- excavation for stormwater basins / management areas, and for realignment of streams

172. As the site is relatively flat, proposed excavation depths are limited to less than one metre except for trenches required for installation of below ground services, and installation of stormwater management areas. Earthworks plans with further details are included at **Appendix 27**.

173. Suitable site-won materials are proposed to be used in a cut-to-fill operation, with excavated material placed as engineered fill as defined by NZS4431:2022 Engineered Fill Construction. Suitable imported sandy gravel material is to be used for sub-base road pavement construction.

174. The earthworks are proposed to be undertaken in approximately 11 stages as identified on the attached plans. Each stage has multiple phases which allow for excavations to be managed appropriately. The maximum area of earthworks open at one time would be five hectares.

175. The earthworks would be stabilised, with most of the site being regraded shaping the in-situ topsoil and re-grassed. The proposed road corridors would be stabilised with gravels until the civil construction works can commence following engineering approval.

176. Groundwater exposure may occur during trenching and the excavation of the stormwater management basins. It is noted that dewatering is proposed during the construction works (where required) and is outlined in a section below.

177. Backfill material in the trenches is proposed to be of low permeability to provide a plug that avoids diversion of groundwater away from its natural flow path. Hardfill is proposed in respect of roads with an excavation depth of approximately 0.6 metres.

178. The key aspects of the erosion sediment and control plan (**ESCP**) and dust management is set out in the Site Management Plan (**SMP** – see **Appendix 30**). All erosion and sediment control measures would be designed and installed in accordance with the ECan Erosion and Sediment Control Toolbox for Canterbury.

Construction Activities

Construction Phase Stormwater Discharge

179. Earthworks and civil works are proposed to be carried out in accordance with the SMP (**Appendix 30**) that has been prepared for the site to ensure compliance with the relevant provisions and minimise any potential adverse effects on the receiving environment.

180. The proposal is for construction phase stormwater to be directed to on-site stormwater retention ponds (**SRP**) to remove sediment and attenuate flows before discharging to the existing roadside outfall swale.

181. Stormwater is proposed to be attenuated and diverted within the site by way of silt fences, diversion drains, earth bunds, and partially constructed roads. Temporary SRP's will be constructed within each stage to store and treat stormwater prior to discharge. The SRP would be constructed above ground due to the high groundwater level and would be lined with PVC to prevent mixing of groundwater with the sediment laden runoff.

182. In respect of Stage 1, the SRP would be constructed to treat an approximately 10.5-hectare catchment area with a 1,500m^3 volume shallow sediment retention pond, sediment forebay, baffles, decant devices, primary spillway, outlet pipe, and emergency spillway. The design of SRP's would be consistent with the typical details provided in the ECan Toolbox.

183. Similar SRP's and erosion/sediment control measures are proposed to be designed for stages 2-11, with the design to be approved by the Regional Council prior to commencing construction of each stage. The SRPs would be designed to treat the specific catchment.

184. While the stages vary in size, with the largest being 22 hectares, the areas of open works, un-stabilised soil would not exceed five hectares at any one time across the site.

185. The discharge points for construction phase stormwater are proposed as per **Table 4**.

Table 4: Location of discharges

Stage	Stage area for works	Discharge point for treated construction phase stormwater
1	12ha	Whites Road drain
2	2.85ha	Ōhoka Stream
3	5.06ha & 1.34ha	Ōhoka Stream and Whites Road drain
4	9.68ha	Whites Road drain (by the southern spring channel)
5	8.39ha	Ōhoka Stream
6	11.17ha	Whites Road drain
7	16.27ha and 2.07ha	Northern Spring channel
8	11.07ha	Whites Road drain
19	13.61ha	South Ōhoka stream
10	12.37ha	Whites Road drain
11	22.55ha	Swale along Stage 10 southern boundary to Whites Road drain

Preliminary ESCP Measures

186. The construction SMP outlines the proposed methodology and measures that would be put in place during the construction phase to control clean run-on water, treatment of sediment laden run-off water, protection from surface erosion, and prevention of dust generation. Key aspects of the ESCP set out in the SMP include:

- The maximum work area to be opened up at any one time would be limited to five hectares.

- No ‘dirty’ water would be discharged from the site during construction. For the first part of Stage 1, a temporary sediment retention basin at the north-east of the site which is constructed to detain any sediment containing stormwater. Similar SRP’s would be constructed to detain sediment within other stages.

- Treated construction phase stormwater would be discharged to the nominated discharge points (discharging to surface water) as per the draft ESCP provided as an appendix to the construction SMP (**Appendix 30**).

- Clean water would be diverted away from construction areas by way of bunds and discharged to waterways.

- The concentration of TSS in construction phase stormwater discharge is to be limited to 50 mg/L. Flocculants would be used within the SRP's when needed in accordance with a Chemical Management Plan.

- Construction run-off would be diverted away from the spring heads and prevented from entering onsite streams by way of silt fencing and bunds. Noting that works in the waterways for realignment and reclamation would require new waterways being constructed offline before the water is diverted into them.

- Earthworks would be re-topsoiled and stabilised by establishing grass cover as soon as possible after completion.

- Silt fences and earth bunds would be used at the site boundary to prevent sediment laden stormwater leaving site and to control run-on water.

187. Site entrances would use existing formed entrance ways off Mill Road (where possible) for Stage 1. If required, these would be upgraded to heavy vehicle entry/exit point to prevent trafficking soil onto Whites Road.

- To ensure dust discharge does not cause any adverse effects on the neighbouring properties within 200m of the site and the wider environment:

    - All site workers shall be advised of the need to minimise dust by the responsible operation of machinery.

    - Vehicle loading and unloading operations shall occur during times of low wind velocity wherever possible. If the earthworks need to occur during periods of high wind velocity, then the material is to be wetted to prevent the discharge of dust beyond the boundary.

    - Stop all dust generating activities when dust control measures become ineffective due to increased wind speed.

    - The existing roading network and site entrance shall be regularly checked for sediment being tracked by vehicle movements from site and swept/sprayed by water cart as required.

    - Water carts would be kept onsite for use as required. Use of irrigation systems to keep haul roads and exposed areas wetted would be implemented as required.

- The site supervisor would be responsible for monitoring and implementing measures to deal with changes in weather.

- Stockpiles of soil shall not exceed a maximum height of 10 metres. The use of irrigation or application of mulch or stabilising polymer dust suppressants to control dust generation from stockpiles.

- Vehicle refuelling would be undertaken in designated areas and would not be located within 100 metres of any waterway.

- Incident response procedures and monitoring and reporting are set out in the SMP.

188. The draft ESCP would be updated and finalised and provided for acceptance prior to works commencing at each stage of the development. Generally, principals identified above would be adopted for each stage, however area specific information would be added to reflect any nuanced requirements associated with any sensitive areas of works.

Flocculants

189. As part of the construction works, it is proposed that the use of flocculants may be required during construction. They may be required for sediment to settle within the sedimentation pond. This would only be required during periods of long or extreme rain events. The use of flocculants would be in line with the ECan Erosion and Sediment Control Toolbox for Canterbury.

190. A Chemical Management Plan would be prepared following approval outlining the use, management and monitoring of flocculant use for each stage of the works.

191. It is anticipated that organic flocculants would be used, however if aluminium-based flocculants are used, then discharges would be managed so the pH level of the discharged water remains within the range of 6.5 – 8.5 and the aluminium level does not exceed 0.055g/m^3 (as outlined in the SMP at **Appendix 30**).

Dewatering

192. Dewatering is proposed during construction due to the potential to encounter groundwater during excavations. A dewatering assessment has been prepared by PDP (**Appendix 32**) that details anticipated dewatering across the site.

193. Dewatering would typically be required for excavations for roads, trenching for services and installation of some shallow pipe networks, sub-soil drains, construction of the SMA's, and excavations for stream realignment works.

194. The anticipated typical excavation depth for trenching is up to 2.5 metres. Approximately 100 metres of trenching (2 metres wide) would be open at any one time with dewatering to occur over the full length.

195. Using a conservative approach, a depth of 2.5-3m metres for excavation has been used in assessing the dewatering requirements for the stormwater and wastewater pipework, and subsoil drainage system, with a dewatering depth of 2.5-3m metres below ground level proposed. This allows for excavations to occur within dry conditions.

196. A stormwater manhole installed in Stage 2 would require a 4m metres excavation (2 metre by 2 metre area) which is the deepest excavation anticipated on the site, with dewatering associated with the construction of this manhole only required for a few days

197. The SMA's are anticipated to require excavation up to 1.5 metres below the assumed highest groundwater level at each SMA location and are anticipated to have a construction period of less than 90 days each, with only a single SMA being constructed at a time. The maximum potential drawdown required at SMA's is 2mbgl.

198. The methodology for dewatering would be confirmed prior to construction depending on the contractor, with options being well points, dewatering bores and/or sump pumping.

199. The discharge of the abstracted groundwater is anticipated to be disposed of to:

- surface water following appropriate treatment for TSS,
- ground via excavations for discharge, and/or
- constructed SMA's on site.

200. The PDP dewatering report (**Appendix 32**) includes the analytical modelling carried out to estimate the abstraction rate required to carry out the dewatering. It is anticipated that the groundwater would be abstracted from the underlying gravel-based deposits. A maximum flow rate of 75 L/s is proposed to be applied due to the uncertainty of the strata being dewatered and to allow for trenching to occur simultaneously with the construction of SMA's.

201. Dewatering is expected to be undertaken for the duration of excavations (earthworks season each year) and would occur within construction stages; limited to 100 metres of trenching at a time concurrent with SMA construction.

202. The SMP (**Appendix 30**) sets out guidelines expected to be employed during dewatering to ensure that the need for dewatering is minimised, water quality at the point of discharge is monitored to ensure that sediment discharged to spring-fed water bodies is less than 50 milligrams per litre, or alternatively water is discharged to land. Dewatering plans would be prepared by a suitably experienced and qualified professional and would detail dewatering methodology and procedures, as well as flocculant treatment that may be required.

Dust Suppression

203. Water carts and irrigation lines would be used to dampen earthworked areas to reduce dust creation by vehicle movements. As outlined in the SMP (**Appendix 30**), dust management needs to be pre-emptively implemented rather than reactive. The water source for the water carts shall be from the existing irrigation bore M35/0367 on-site. This requires a small groundwater take to ensure dust suppression can be managed appropriately on site. Dust suppression may occur for six months of the year. The following rates and volumes of take are sought:

- Maximum instantaneous rate of take of 22.8 L/s from M35/0367
- Maximum daily volume of 500 m^3.
- Maximum weekly volume limit of 2,700 m^3.
- Maximum annual volume of 28,600 m^3.

Works in Surface Waterbodies

204. The proposal includes the removal and realignment of existing waterways, construction of new surface waterways, and removal and creation of wetlands. The Applicant's approach to surface waterways is to retain, in some instances realign, and enhance the rivers/streams with the higher ecological values. This has resulted in the following key outcomes:

- No modifications to the Ōhoka Stream Tributary alignment and provision of a 20-metre-wide riparian buffer.
- Realignment of part of the South Ōhoka Branch and provision of a 15-metre-wide riparian buffer.
- Realignment of the Northern Spring channel to join the southern spring channel. The spring heads are proposed to have a 30-metre buffer with the spring channels having a 15-metre buffer.
- Realignment of the southern seep to discharge into the Whites Road drain (as it currently does). The springhead would have a 20-metre buffer with a 10-metre buffer for the new channel alignment.

205. These streams are to be provided with generous buffer distances to protect ecological values and provide for enhancement opportunities. Many of the modified natural watercourses and farm drains on the site have low ecological value and would be infilled.

206. The proposed works within the surface waterbodies on site, including reclamation, realignment and installation of culverts are outlined in **Table 5**. Additionally, stormwater discharge outlet devices are to be constructed that will discharge to the surface waterbodies. However, this does not require 'in-stream works' but would occur on the banks.

Table 5 Proposed surface waterbodies works

Watercourse Name	Ecological Values Summary*	Proposed Works
Ōhoka Tributary	High Ecological Value	Retain current alignment and restoration and enhancement works proposed. 20-metre buffer proposed. A single culvert crossing is proposed for the central spine road. No loss of extent.
South **Ōhoka Branch**	High Ecological Value	Retain western portion, realign channel for approximately 400 metres around the current farm housing then reconnect with existing lower reaches. A 15-metre buffer proposed.
Two springs mapped on ECan online database	Moderate Ecological Value	Retain spring within an existing wetland, enhance wetland. 30-metre buffer proposed.
	Moderate Ecological Value	Retain spring within an existing wetland, enhance wetland. 30-metre buffer proposed.
Northern Spring Channel	Moderate Ecological Value	Retain western portion of the channel, then realign to connect with the southern spring channel. A culvert is proposed to cross the channel. 15-metre buffer proposed. The eastern portion of this channel is to be removed.

Southern Spring Channel	Moderate Ecological Value	Retain this channel, with some realignment proposed adjacent to the southern spring. 15-metre buffer proposed. A culvert is proposed for the central spine road to cross this channel.
Groundwater seep	Low Ecological Value	Retain spring within an existing wetland, enhance wetland. 20-metre buffer for the springhead is proposed. Realign the seep channel to join Whites Road drain (as it currently does) 10-metre buffer proposed. Remove existing channel alignment.
Unnamed Drain 1 Overland drainage path across the south of the site	Low Ecological Value	Remove/infill existing channel. Create new overland swale path with two culverts proposed for the roads.
Unnamed Drain 2 - Central ponded drain	Low Ecological Value	Remove/infill channel.
Unnamed Drain 3 - north-east drain	Low Ecological Value	Remove/infill channel.
Unnamed Drain – South boundary drain	Low Ecological Value	This drain will be retained and a 5-metre setback provided within the lots.
* (refer to **Appendix 19** for further detail)		

River/waterway Reclamation

207. River/waterway reclamation is proposed in specific locations across the site where infilling of modified drains and low-value waterways is necessary to enable the integrated servicing and stormwater management of the development. These works are not widespread but are targeted to locations where retention of the existing alignments would constrain the ability to achieve a coordinated and functional urban form.

208. Further detail on the spatial extent of watercourse reclamation and realignment is provided in the aquatic ecology assessment (**Appendix 19**). In total, the proposal would result in a loss of approximately 3,059 metres of existing waterway length, primarily comprising highly modified drains and low ecological value channels.

    This loss is offset by a comprehensive package of riparian and buffer planting and management measures across the site. In particular, the proposal provides:

    - approximately 60,472 m² of riparian setback areas adjacent to retained and reconfigured waterways; and

    - an additional 96,747 m² of stream and spring buffer setbacks to support the protection and enhancement of spring-fed systems.

209. These measures represent a substantial increase in the extent and quality of riparian margin relative to the current environment.

Removal of Culverts

210. As part of the proposed infilling of existing modified watercourses and drains, and the naturalisation of retained and reconfigured stream channels, a number of existing farm culvert crossings would be removed.

211. Specifically, the proposal would result in the removal of:

- two culverts within the Ōhoka Stream tributary;
- four culverts within the northern and central spring-fed streams; and
- ten culverts within the South Ōhoka Branch.

212. The removal of these culverts is an integral component of the overall waterway strategy. Many of the existing crossings are associated with historical agricultural land use and do not reflect best practice in terms of stream function or ecological performance. Their removal would enable the reinstatement of more natural channel forms and continuous stream reaches, supporting improved hydraulic performance and ecological integrity.

213. Culvert removal would enhance opportunities for stream naturalisation, including regrading of banks, reinstatement of more natural channel morphology, and establishment of riparian margins. The removal of culverts from South Ōhoka Branch, Ōhoka Tributary and the spring-fed waterways would also assist in improving in-stream habitat quality and facilitate fish passage by removing barriers and providing continuous longitudinal connectivity within the stream network.

Installation of New Culverts and Bridges

214. The proposal includes the installation of culverts for road crossings and pedestrian bridges across the internal waterways.

215. Culverts are proposed within internal roads to cross the Ōhoka Tributary, Northern and Southern/Central Spring Channels, the South Ōhoka Branch, and artificial drains. An additional culvert is proposed across the Southern/Central Spring Channel to service a cul-de-sac in the western portion of the site, and further culverts are proposed within Stage 11 to convey stormwater flows connecting to the proposed roadside swale network. Culverts are also required to form road connections at Whites Road, Mill Road, and Bradleys Road.

216. In total, six culvert crossings are proposed within internal roads. A further 13 culverts are proposed along site boundaries, comprising seven road crossings and six smaller driveway culverts along Mill Road. The Mill Road and Bradleys Road culvert crossings are located within artificial watercourses.

217. Culvert types include both box culverts and circular culverts. Indicative culvert design is provided in the Proposed Stormwater Culvert Layout Plans – Sheets 1–12; Ref 16013-00-RC-4400 to 16013-00-RC-4413 Rev B, Inovo Drawings (**Appendix 27**).

218. Pedestrian bridges are proposed at four locations along roads, co-located with Culverts 06 to 09. An additional pedestrian bridge is proposed at the point where the Ohoka Tributary Stream exits the site along Whites Road. Further pedestrian crossings (approximately seven) are included to maintain connectivity throughout the development. The bridges will be constructed from timber or steel and designed to span the waterways, with no permanent structures located within the stream bed. Construction activities will be confined to within the stream banks.

Table 6 Proposed internal culverts

Internal Culverts	Length	Dimensions
Ōhoka Tributary – Culvert 09	11 m	Two parallel box culverts (4000 mm × 2500 mm)
Northern Spring Channel – Culvert 07	11 m	1500 mm × 1500 mm box culvert
Northern Spring Channel – Culvert 08	11 m	900 mm × 900 mm box culvert
South Ōhoka Branch – Culvert 06	11 m	1500 mm × 1500 mm box culvert
Unnamed Drain – Culvert 10	11 m	Three parallel 600 mm culverts
Unnamed Drain – Culvert 11	14 m	Three parallel 600 mm culverts

Table 7 Proposed external culverts

External Culverts	Length	Dimensions
Mill Road Driveways (multiple lots crossing artificial watercourse)	4–14 m (indicative)	900 mm circular culverts (indicative)
Mill Road 01	36 m	900 mm
Whites Road 01	27 m	Four box culverts (2000 mm × 800 mm)
Whites Road 02	14 m	Two parallel 900 mm culverts
Whites Road 03	19 m	Two parallel 900 mm culverts
Whites Road 04	21 m	900 mm
Bradleys Road 01	17 m	900 mm
Bradleys Road 02	18 m	Two parallel 800 mm culverts

219. Culverts would be installed within the stream/artificial watercourse bed with a minimum of 25% of the culvert diameter embedded below bed level. They would be aligned parallel to the natural bed slope, with natural substrate reinstated along the full length of the culvert.

220. At the detailed design stage, culverts within streams would be designed to maintain upstream and downstream hydraulic characteristics, including flow velocities, to enable fish passage for species present. The detailed design would be reviewed and certified by a suitably qualified freshwater ecologist to confirm that the design is appropriate for fish passage.

221. Culverts will operate passively, conveying baseflows and stormwater runoff in accordance with natural hydrological processes, without active control structures. They are designed to maintain hydraulic connectivity, substrate continuity, and fish passage, and to convey peak flows without significant upstream ponding. Routine maintenance (including debris removal) will be undertaken to ensure ongoing functionality.

222. Fish passage within streams would be maintained through culvert design and construction methods that replicate natural flow conditions and substrate continuity. Construction within natural waterways would be staged to avoid sensitive periods (including trout spawning season), with works isolated and fish salvage undertaken where required.

223. Final culvert designs for streams would be reviewed by a suitably qualified freshwater ecologist to confirm compliance with the relevant fish passage requirements and where practicable to comply with fish passage guidelines.

224. Proposed conditions to ensure fish salvage and fish passage include the preparation of the following documents prior to in-stream works:

- a streamworks management plan, detailing instream construction methods, culvert installation, fish passage, and fish salvage; and

- an ecological management plan, including stream restoration, habitat enhancement, and ongoing provision for fish passage.

Construction Methodology for Instream Structures

225. Works in and around surface water bodies and springs would be managed in accordance with the SMP and specific ESCPs prepared for each stage.

226. The proposed design of stream crossings would be finalised in the detailed design phase. Depending on water flow, temporary diversions or over pumping may be required to enable the foundation excavation and construction.

227. It is anticipated that the proposed works would be carried out when the stream is dry/low flows. The works would not be carried out during a storm event that results in flows in the stream. However, in the unlikely event that there are some residual flows of water in the stream, temporary sandbag dams (or similar) can be placed upstream in the stream so that the works do not occur in flowing water. Temporary diversion or over pumping would be required depending on water flows. Works should be undertaken during summer to manage water flow volumes, with the diversion requirements to be based off confirmed volumes at the time of construction.

228. The construction SMP includes a provisional ESCP which describes how the effects of sedimentation from construction would be managed. Additionally, stormwater would be treated as per industry standards to remove or reduce contaminants to acceptable levels. Clean water would be diverted back to waterways, with dirty water diverted for treatment prior to discharge.

229. The method for the training/realignment of the stream would be implemented entirely 'off-line' to prevent dirty water discharging down the stream. This would occur until each section is shaped, stabilised and landscaped.

230. Filling in drains and stream channels that are proposed to be reclaimed would occur as part of bulk earthworks for the relevant stage, with associated construction phase stormwater directed to a SRP. Suitable clean fill would be used, with all fill to meet NZS4431:2022 Engineered Fill Construction.

231. Ecological management measures shall be implemented prior to and during construction to avoid, remedy or mitigate adverse effects on water quality and aquatic ecology. A streamworks management plan and an ecological management plan shall be prepared and submitted for certification prior to the commencement of any works of a particular stage on site. These plans shall set out detailed requirements for in-stream works, erosion and sediment control, and fish salvage procedures. No works within streams or drains shall commence until fish salvage has been completed in accordance with the certified streamworks management plan.

232. The pedestrian bridges would be designed and constructed so that piles would not be located within flowing water and would not require any temporary take (out of bed) and discharge of water, or instream diversion.

Removal of Wetlands

233. Wetlands are present across the site, comprising modified and natural inland wetland areas associated with drains, springheads, and low-lying depressions. The proposal includes the removal of approximately 3.5 Ha of wetland, with the retention of a further 0.84 Ha within the site. Wetland removal is identified in the construction site management plan – appendix 2 (**Appendix 30**).

234. The wetlands proposed to be removed are predominantly of low ecological value, reflecting their highly modified state and limited habitat function. In contrast, higher value wetland systems (classified as 'moderate') associated with the Ōhoka tributary and key springhead areas (including the Seep, Northern Spring, and Central/Southern Spring systems) will be retained and enhanced, ensuring the protection of the most ecologically significant features on the site.

235. Overall, approximately 0.84 ha of natural inland wetland would be retained within the development footprint. This is complemented by a substantial programme of wetland creation and restoration, including approximately 3.3 ha of new wetland habitat within the stormwater management areas (**SMA**); and an additional 1.0 ha of riparian wetland (fresh plains) creation adjacent to the Ōhoka Tributary, central springs channel, and the South Ōhoka Branch.

236. Wetland mitigation, offsetting and compensation will be achieved through the design and establishment of these new and enhanced wetland systems. These areas would be planted in indigenous species appropriate to wetland environments to support biodiversity, improve habitat complexity, and enhance ecological function.

237. There is a ponded area near the southern springhead. A total of 2,011m^2 of pond is proposed to remain, with 612m^2 to be removed. The retained area will be incorporated into the overall wetland and pond system, with appropriate setback buffers to protect springhead function and maintain ecological integrity.

Natural and Other Hazards

238. The site is not subject to any significant natural hazards, though the site is identified within the POWDP as being affected by the Non-Urban Flood Assessment Area, where flow paths have been identified as potentially being impacted by flood waters under a 1:200 ARI event. It is proposed to maintain or divert flows along existing/altered waterways and within road corridors to ensure continuity of flow paths.

Wildlife

239. An indigenous lizard population exists within the limited habitat identified within the site (as per the PDP reporting at **Appendix 24**) which would be disrupted by the proposed subdivision and development. The Applicant seeks a wildlife approval which would allow for the proposed development to proceed in accordance with a lizard management plan (**Appendix 24**) which directs the following:

- Vegetation clearance is to occur from October to April when lizards are more active, helping them avoid disturbance.
- Low-impact deterrent methods such as livestock grazing, mowing, and eco-piles are to be used to discourage lizards from inhabiting the area.
- Lizard tracking and trapping surveys are to be conducted before development begins.
- If native lizards are found, salvage and relocation must occur before construction starts.
- If large vegetation needs to be cleared after lizards are found, a project herpetologist must supervise and search for lizards during removal.
- Accidental discoveries of lizards during development invoke the protocol set out in section 3.2 of the management plan.
- Captured lizards are to be relocated to enhanced habitat within the site by the project herpetologist.
- Habitat enhancement may be carried out at the relocation site depending on its condition.

Archaeology

240. As set out in the site description section above, the site contains a recorded archaeological site comprising remnants of the Ōhoka Railway Station. The proposal would result in the

modification/destruction of this archaeological site in accordance with an archaeology management plan, a draft of which is included at **Appendix 12**.

Statutory Context

Fast-track Approvals Act 2024

241. This application is made under the Fast-track Approvals Act 2024.

Government Policy Statements

242. If the Minister issues a Government Policy Statement that is relevant to the project under section 10A of the Act, the panel must take it into account pursuant to section 81(2)(aab). Currently there are no such policy statements that apply to the project.

Resource Management Act 1991

243. This application is for approvals sought under section 42(4)(a) – resource consents that would have otherwise been applied for under the RMA. The assessment of effects on the environment relevant to the various resource consents sought is prepared in accordance with the information requirements of the Act, specifically clauses 5 - 8 of Schedule 5. Where logical, this has included an assessment of effects in accordance with the requirements of the RMA.

244. The Act establishes a statutory framework that differs materially from conventional decision-making under the RMA. It establishes a distinct approach to the application of assessment criteria apply, the treatment of policy inconsistency, and consideration of activities that would otherwise be prohibited under the RMA.

245. Under the RMA, an application may be declined where adverse effects are unacceptable or where the proposal is contrary to objectives and policies of relevant planning instruments. Those conventional assessment criteria (i.e. sections 104 and 104D) pathways do not apply in the same way under the Act.

246. Clause 17 of Schedule 5 sets out the criteria for considering a consent application. The assessment must "take into account" the purpose of the Act and the relevant provisions of the RMA and relevant provision of any other legislation that directs decision making under the RMA. In undertaking this assessment, the panel must give greatest weight to the purpose of the Act which is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

247. Section 85 of the Act provides that a substantive application may only be declined where the panel is satisfied that the project would result in adverse impacts that are sufficiently significant to be out of proportion to the regional or national benefits of the project. The Act therefore anticipates that Fast-track projects may involve adverse effects, policy inconsistency, or activities that would not ordinarily be approved under the RMA, and requires the panel to undertake a proportionality assessment rather than apply standard RMA thresholds.

Treatment of Policy Inconsistency

248. The Act requires the panel to "take into account" relevant planning instruments, including national policy statements, regional policy statements, regional plans, and district plans. However, the Act expressly provides that provisions which would ordinarily require refusal under the RMA must not be treated as determinative (clause 17(4) of Schedule 5).

249. Accordingly, inconsistency with objectives and policies – particularly those that are directive in nature, such as provisions relating to the location of urban growth – does not of itself require refusal. Instead, policy inconsistency may be treated as a relevant adverse impact to be weighed as part of the overall proportionality assessment under section 85(3), alongside the project's benefits and other adverse effects.

250. This application acknowledges areas of policy tension, particularly in relation to strategic growth direction and freshwater management. Those matters are addressed in the assessment of effects and are considered in the section 85(3) analysis.

Prohibited Activities

251. The Act also modifies the treatment of activities that would otherwise be prohibited under the RMA, including an activity described as prohibited activity in a national environmental standard[8]. Section 42(5) of the Act expressly authorises substantive applications to seek approvals for activities that would otherwise be a prohibited activity under the RMA. Clause 17(3) of Schedule 5 further provides that whether any provision of the RMA (including s 87A(6) would ordinarily require a decision make to decline an application for a resource consent, "the panel must take into account that the provision referred to in subclause (3) would normally require an application to be declined, but must not treat the provision as requiring the panel to decline the application the panel is considering."

252. Accordingly, where an approval for a prohibited activity is sought, the panel must assess the nature, scale, and significance of the adverse impacts associated with those activities, the extent to which those impacts are avoided, remedied, mitigated, or offset, and whether any residual adverse impacts are out of proportion to the project's regional or national benefits.

253. This application includes the activities described below that would be prohibited under the RMA, but which are eligible for consideration under the Act. Those activities are clearly identified, their effects are assessed in detail, and their contribution to the overall proportionality assessment is addressed.

254. The prohibited activity that is application includes is prohibited under the NES Freshwater, specifically the drainage natural inland wetlands under Regulation 53. The proposal involves the removal of approximately 3.5 Ha of predominantly low-value wetland habitat within a modified rural environment.

[8] RMA, section 87A(6).

National Environmental Standards

255. A compliance assessment against the relevant national planning instruments is contained in **Appendix 33**.

NES Soil

256. Evidence has been found of ground contamination and/or activities described on the Hazardous Substances and Industries List (**HAIL**) occurring or having occurred on the site. Therefore, the NES Soil regulations apply to the application.

257. A Detailed Site Investigation (**DSI**) has been prepared by Tetra Tech Coffey with a supplementary report prepared by EHS Support (both reports are included in **Appendix 13**). The Tetra Tech Coffey report notes that the land has been identified as having potentially accommodated HAIL activities A10 – persistent pesticide use associated with agricultural use of the property, A17 – associated with fuel and chemical storage, G3 – associated with areas of filling (suspected landfill), farm dump and burn piles, and H – contamination derived from lead containing paint.

258. The EHS Support report summarises the soil analytical results from both reports as follows:

> *Soil analytical results indicate results indicate the wider site is generally free of significant contamination (meets background).*
>
> *Concentrations of arsenic, cadmium or lead in excess of SCS for residential land use were detected at 10 sampling locations as follows:*
>
> > *S104, S105 (northern buildings) – cadmium. Considered likely to reflect potential storage of fertiliser at this location.*
> >
> > *S201 (northern buildings) – arsenic. Considered likely to result from sawing of treated timber (sawdust observed in supplementary DSI soil sample S1).*
> >
> > *S206, S207 (northern buildings) – arsenic. Burn pile.*
> >
> > *TP105 (former railyard in northwest portion of the site) – lead. Slightly exceeds SCS only, other samples in the area returned lead less than SCS.*
> >
> > *S111 (central buildings) – lead. Also elevated zinc. Likely lead paint related.*
> >
> > *S121 (central buildings) – arsenic. Elevated copper and chromium also detected and as such, it is considered that the elevated arsenic results from storage or cutting of treated timber at this location.*
> >
> > *S39, S44 (central buildings) – arsenic. Treated timber related (likely outdoor storage).*
>
> *Asbestos was detected at a concentration in excess of human health guideline criteria in a single June 2025 DSI sample (S126) collected on the south side of the dwelling in the central area of the site. Supplementary DSI bulk (cement board fragments) and soil samples in the immediate vicinity of sample S126 did not detect asbestos.*

The June 2025 DSI and Supplementary results indicate soils exceeding SCS for residential land use are likely to be isolated areas of limited extent and volume.

One or more of arsenic, cadmium, chromium, copper, lead and zinc were detected at concentrations in excess of ANZG GV-High sediment guideline values and/or the WMINZ leaching to water criteria in 17 locations.

With the exception of zinc, results exceeding ANZG GV-High or WMINZ leaching to water criteria are generally associated with soils that also exceed SCS for residential land use (e.g. arsenic, chromium, copper and zinc in soils associated with the burnpile in the northern buildings area (samples S206 and S207)). The elevated zinc concentrations detected were typically from samples collected adjacent to corrugated iron clad buildings.

The June 2025 DSI and Supplementary DSI results indicate soils exceeding ANZG GV-High or WMINZ leaching to water criteria are of limited extent. Accordingly, it is considered unlikely these soils are likely to present a significant risk to surface water ecological or groundwater receptors. Additionally, given the extent of impacted soils is limited, these soils should be able to easily managed (e.g. via removal) during the site development program.

259. Resource consent for subdivision and change of use is required under the NES Soil as a restricted discretionary activity due to the presence of soil contamination above the applicable standards in regulation 7.

260. The Tetra Tech Coffey report recommends the preparation of a remedial action plan (**RAP**) be included as a condition of consent. The RAP would ensure appropriate management and/or remediation prior to the change of use or development of each stage of the subdivision. Should off-site disposal be required for remediation, contaminated material would be disposed to an approved facility. Following remediation, a site validation report would be required to be produced and provided to the district and regional councils.

261. The remediation volumes may exceed NES Soil permitted thresholds. If this transpires, a controlled activity resource consent under regulation 9(1) of the NES Soil is required for soil disturbance associated with remediation of the contaminated areas. On this basis, and taking a precautionary approach, consent is sought to authorise any necessary remediation that exceeds NES Soil permitted volumes.

NES Freshwater

262. The site has several surface waterbodies and wetlands have been identified on site. The NES Freshwater set out requirements for carrying out activities that pose risks to freshwater and their ecosystems. The proposal requires consent under the NES Freshwater regulations for activities relating to earthworks, vegetation removal and discharge within 10m of a natural inland wetland (non-complying activities under regulation 54(a) and (b), as well as earthworks (outside of a wetland, but within 100m) resulting in the complete or partial drainage of wetlands (regulation 52(1) and (2)).

263. The proposal also includes the removal of natural inland wetlands on site. Pursuant to regulation 53, it is a prohibited activity to drain a natural inland wetland.

264. The strategy in developing the site and review of ecological considerations is to promote and improve the ecological health and function of waterways, springheads, and wetlands with higher ecological value. This provides appropriate offsetting and compensation for the degraded wetlands proposed to be removed.

265. Consent is also required for the reclamation of a river(s) as a discretionary activity under regulation 57.

266. Under regulation 57 of the NES Freshwater, river reclamation is a discretionary activity and is subject to a gateway test. In particular, in an ordinary RMA consenting process, regulation 57 provides that resource consent may only be granted where the consent authority is satisfied that there is a demonstrated functional need for the reclamation to occur at the specific site, and that the effects management hierarchy has been appropriately applied. There are several modified natural watercourses (farm drains) on site which are proposed to be reclaimed, as well as the realignment, and associated reclamation of channels, of higher-ecological value waterways. Refer to watercourse and wetland changes plan (**Appendix 47**) for details regarding the loss of extent, and the identification of the specific waterways being reclaimed.

267. It is considered that the proposed reclamation satisfies the functional need gateway test, as the activity must occur at the locations identified to enable the development to function as intended. Consideration of the functional need and the application of the effects management hierarchy is provided in the planning assessment (**Appendix 42**).

268. The proposal also includes the removal of existing culverts and installation of new culverts within waterways to enable road construction and at the boundary of the site to connect to the wider road network. These culverts would be designed to comply with the permitted activity standards set out in regulation 70 to ensure the passage of fish is not affected by structures.

NES for Sources of Human Drinking Water

269. The NES Drinking Water aim to protect the quality of drinking water sources from potential contamination arising from land use or discharge activities.

270. The proposed development includes the discharge of treated stormwater to surface water, with potential interception of shallow groundwater. These aspects have been assessed to determine any potential risks to registered drinking water supplies.

271. The NES Drinking Water applies specifically to activities located upstream of a registered community drinking water abstraction point. In this case, the nearest Community Drinking Water Protection Zone is located upstream (to the north-east) of the site. Therefore, the NES Drinking Water does not apply directly to the proposed stormwater discharge, which is located downstream of this protection zone.

272. Nearby private wells that are located downstream of the site and draw water from deeper gravel aquifers (typically greater than 8 metres deep) well separate from any shallow groundwater interaction. These bores are not associated with registered drinking water supplies and do not engage NES Drinking Water considerations.

Waimakariri District Plans

273. The District Council made decisions on the Proposed Plan making it partially operative as notified on 14 July 2025. The parts of the POWDP that are subject to appeal will become operative once appeals to the Environment Court are resolved. Therefore, depending on the scope of appeals, both the operative OWDP and POWDP may apply.

274. As mentioned previously, the Applicant has appealed the District Council's decisions on its rezoning submission. The relief sought in the appeal is that the site be rezoned from Rural Lifestyle to a range of urban zones.

275. Given the scope of the appeal, we consider that the OWDP has limited (if any) relevance to this application. The appeal does not challenge the provisions of the Proposed Plan, only the zoning of the site.

Operative Waimakariri District Plan

276. The site is zoned Rural in the OWDP. The planning maps identify the 66kV electricity transmission lines that run through the western part of site and that esplanade provisions apply along Ōhoka Stream.

277. For completeness, a compliance assessment against the rules of the OWDP is contained in **Appendix 34**. The proposal requires resource consent for the reasons set out in **Table** 8 below.

Table 8: Reasons for consent under the OWDP

Land and Water Margins	
23.3 Discretionary Activities (Restricted)	
23.3.1 Any land use that does not comply with one or more of the conditions under Rules 23.1.1.1 to 23.1.1.6 is a discretionary activity (restricted), except where exempted by Rule 23.1.2.	**RD** The proposal does not comply with rules 23.1.1.2, 23.1.1.3 and 23.1.1.4.
23.3.2 Any land use involving earthworks, including the extraction of minerals, that does not comply with Rules 23.1.1.7 to 23.1.1.10 is a discretionary activity (restricted), except where exempted by Rule 23.1.2.	**RD** The proposal does not comply with Rule 23.1.1.8 and 23.1.1.10.
23.4 Discretionary Activities	
23.4.1 Any land use activity which is to be carried out on a contaminated site and involves: a. the use, erection, reconstruction, placement, alteration, extension, removal or demolition of any structure or part of any structure in, on, under, or over the land; b. the excavation, drilling, tunnelling or other disturbance of the land;	**D** The proposal involves excavation and disturbance of contaminated land.

c. the destruction of, damage to, or disturbance of the habitats of plants or animals in, on or under the land; or d. the deposit of any substance in, on or under the land of the site is a discretionary activity.	
Utilities	
30.3 Discretionary Activities (Restricted)	
30.3.1 Except as provided for in Rule 30.4, or where exempted by Rule 30.1.2, the construction or alteration of, or addition to, a utility building or structure which exceeds 35 m^2 floor area is a discretionary activity (restricted).	**RD** The wastewater pump station would be housed within a building which is likely to be 30-40m^2 in area. Consent is sought in case the building exceeds 35m^2 in area.
30.3.3 The construction of roads that do not comply with Rules 30.1.1.9, 30.1.1.10 and 30.1.1.11 is a discretionary activity (restricted) except where exempted by Rule 30.1.2.	**RD** The proposal does not comply with rule 30.1.1.9.
Traffic Management	
30.8 Discretionary Activity (Restricted)	
30.8.2 The provision of 20 or more new car parking spaces on any site other than within the Rural Zone, excluding: a. sites subject to Rules 30.6.2.8, 30.6.2.9 and 30.6.2.10, or b. any extension to an existing car parking facility where no more than nine parking spaces are added within any five year period. is a discretionary activity (restricted).	**RD** The proposed parking lot facility in the commercial area has more than 20 spaces.
30.9 Discretionary Activity	
30.9.1 Except as provided for by Rule 30.7 or Rule 30.8.5, any land use that does not comply with one or more of the conditions under Rule 30.6.1.1 to 30.6.1.32 or 30.7.1 is a discretionary activity except where it is a non-complying activity under Rule 30.10 or it is exempted by Rule 30.6.2.	**D** The proposal does not comply with rules 30.6.1.1, 30.6.1.2, 30.6.1.13, 30.6.1.19 and 30.6.1.32.
Buildings and Structures	
31.4 Discretionary Activities	
31.4.1 Except as provided for by Rules 31.1.2, 31.2, 31.3, 31.5 and 31.6 any land use which does not comply with one or more of Rules 31.1.1.10 to 31.1.1.17, 31.1.1.20 to 31.1.1.66 is a discretionary activity.	**D** The proposal does not comply with Rule 31.1.1.15.

31.5 Non-complying Activities	
31.5.1 Any land use which does not comply with Rules 31.1.1.1 to 31.1.1.6 (standards for a site, or delineated area, containing a dwellinghouse) or Rules 31.3.2 and 31.4.2 is a non-complying activity except where exempted under Rule 31.1.2.	**NC** The proposal does not comply with Rule 31.1.1.1.
Signs	
31.8 Discretionary Activities (Restricted)	
31.8.1 Any land use which does not comply with one or more of Rules 31.7.1.3 to 31.7.1.7 is a discretionary activity (restricted), except where exempted under Rule 31.7.2.	**RD** The proposal does not comply with Rule 31.7.1.7.
Retail Activities and Traffic Matters	
31.25 Discretionary Activities (Restricted)	
31.25.2 Any land use on any site in the Rural Zone that has a parking requirement of 10 or more on-site spaces under Rule 30.6.1.34, excluding parking requirements associated with any dwellinghouse, is a discretionary activity (restricted).	**RD** The proposed parking lot facility in the commercial area has more than 10 parking spaces.
31.25.3 Except as provided for by Rule 31.26, any land use in any zone resulting in a total of more than 250 motorised vehicles movements, either entering or exiting the site, per day is a discretionary activity (restricted).	**RD** Future activities within the proposed commercial allotments may generate more than 250 vehicle movements per day.
31.26 Discretionary Activities	
31.26.1 Any land use which does not comply with one or more of the conditions under Rule 31.23.1 is a discretionary activity.	**D** The proposal does not comply with rules 31.23.1.8 and 31.23.1.9
Subdivision	
32.2 Discretionary Activities (Restricted)	
32.2.1 Except as provided for by Rules 32.3 or 32.4, or where exempted under Rule 32.1.2, any new allotment that does not comply with the corner splay standards and terms of Rules 32.1.1.48 to 32.1.1.49 is a discretionary activity (restricted).	**RD** The proposal does not comply with rule 32.1.1.49.
32.3 Discretionary Activities	
32.3.1 Except as provided for by Rule 32.4 any new allotment in any zone that does not comply with Rules 32.1.1.29 to 32.1.1.32 (traffic management) and 32.1.1.47 is a discretionary activity.	**D** The proposed does not comply with rule 32.1.1.29

32.4 Non-complying Activities	
32.4.1 Except where exempted under Rule 32.1.2, any subdivision that does not comply with Rules 32.1.1.1 to 32.1.1.28, 32.1.1.54 to 32.1.1.57 or 32.1.1.65 to 32.1.1.76, or 32.1.1.78 and 32.1.1.80 to 32.1.1.82 or 32.1.1.92 or 32.1.1.94 is a non-complying activity.	**NC** The proposed does not comply with rules 31.1.1.1 and 31.1.1.3

278. The proposal has **non-complying** activity status under the OWDP.

Partially Operative Waimakariri District Plan

279. The site is zoned Rural Lifestyle in the POWDP and is subject to the following overlays and notations:

- Non-Urban Flood Assessment Area,
- National Grid Transmission Lines,
- National Grid Yard,
- Christchurch International Airport Bird Strike Management[9],
- Liquefaction Overlay (Liquefaction damage is unlikely),
- Ngā Wai,
- Esplanade Provisions, and
- Ecological District: Low Plains.

280. A compliance assessment against the rules of the POWDP is contained in **Appendix 35**. The proposal requires resource consent for the reasons set out in **Table 9** below.

Table 9: Reasons for consent under the POWDP

Energy and Infrastructure	
EI-R20 New infrastructure building	
All Zones	
Activity status when compliance not achieved: RDIS	**RD** The proposal does not comply with rule EI-R20 2.a and 2.b. because the proposed wastewater pump station would be housed within a building which is likely to be over 30m^2 in area. Further, an associated storage tank may be over 5.5 metres in height. The area and/or height of these buildings exceed the maximum permitted by the POWDP.

[9] We note there are no bird strike related rules relevant to the proposed subdivision/development.

EI-R45 Construction of new, or renewal or upgrading of existing, water supply, wastewater system, or stormwater infrastructure	
All Zones	
Activity status when compliance with EI-R46 (1) to (4) and (6) not achieved: RDIS	**RD** The proposal does not comply with permitted activity standard 7. This standard requires compliance with earthworks standards which are not complied with in respect of EW-S1, EW-S2 and EW-S4. We note that the activity status is unclear because the rule only references the activity status where compliance is not achieved in respect of standard 1-6. The discretionary rule refers to non-compliance with standard 5. This leaves standard 7 without activity status direction. However, we assume the earthworks matters of discretion would be relevant.
Transport	
TRAN-S1 Design standards for new roads	
All Zones	
Activity status when compliance not achieved: RDIS	**RD** The proposal does not comply with TRANS-S1 which requires compliance with design standards. In respect of Low Volume Local Roads (16-metre Corridor), three roads are proposed in this category and the following are noted: - Two of these roads are longer than the maximum permitted 150 metres (Road 2-4 is 176 metres and Road 2-5 is 170 metres); - Fewer than 20 lots would access each road; - Footpaths of 1.8 metres width are required both sides of the road, whereas a footpath is proposed on one side only; and - The carriageway is required to be 6.5 metres wide (a 4-metre traffic lane plus a 2.5-metre-wide parking lane). The proposed carriageway is 6 metres, with two traffic lanes of 3 metres proposed. In respect of Local Road (18-metre corridor) – which the remaining roads are proposed to be – the following is noted: - These roads are each anticipated to accommodate no more than 200 residential units; - Corridor widths of 18 metres to 22 metres are proposed. We assume that the required width of 18 metres is a minimum and therefore the proposal complies;

	- Footpaths of 1.8 metres width are required both sides of the road. Cross-sections C & D have footpaths both sides, but cross-sections A & B have a footpath one side and a shared path the other; and - The carriageway is required to be 8 metres wide (4-metre traffic lane plus 2-metre parking lanes both sides). The carriageway for cross-section A is 9 metres with further space for 2.5-metre-wide indented car parking both sides. The carriageway for cross-section B is 9 metres with no indented car parking. The carriageway for cross-section C is 7 metres with further space for 2.5-metre-wide indented car parking both sides. The carriageway for cross-section D is 7 metres with no indented car parking.
TRAN-S2 Minimum road intersection separation distances	
All Zones	
Activity status when compliance not achieved: RDIS	**RD** The proposal does not comply with TRANS-S2 which requires certain minimum road intersection separation distances as follows: Requires the following minimum separations: - 800 metres for intersections to 100km/h roads (such as Bradleys Rd and Whites Rd existing speed limits); - 550 metres for intersections to 80km/h roads (such as Bradleys Rd and Whites Rd suggested speed limits); - 160 metres for intersections to 60km/h roads (Mill Road); and - 75 metres for intersections between Local Roads in 50km/h speed limit areas (internal intersections). The following intersection separations are proposed: - Bradleys Road - 485 metres to 517 metres; - Whites Road - 246 metres to 430 metres south of Ōhoka Stream and 262 metres north of Ōhoka Stream; - Mill Road - At least 232 metres; - Internal intersections typically separated by at least 40 metres (centre to centre), although the typical spacing is in the range of 60 metres to 80 metres.
TRAN-S3 Design standards for new vehicle crossings	
All Zones	
Activity status when compliance not achieved: RDIS	**RD**

	The proposal does not comply with TRANS-S3 which specifies design standards for new vehicle crossings. Vehicle crossings would be applied for at the time of seeking resource consent for each site (if required). - A compliant number of crossings can be provided for each Lot. - Compliant separation distances of crossings could be achieved for each access. - Some accesses would be located within the intersection (opposite the minor arm) and therefore within the intersection. - The accesses to lots 574 to 576 & 711 to 713 have a maximum formed width of 5.5 metres, compared to a maximum of 4.5 metres permitted by the POWDP. - A minimum sight distance of 90 metres is required from all vehicle accesses, which would not be achieved. - Compliant separation from pedestrian crossing islands is anticipated.
TRAN-S4 Design standards for new vehicle accessways	
All Zones	
Activity status when compliance not achieved: RDIS	**RD** The proposal does not comply with TRANS-S4. Accesses in a rural zone are required to have a minimum legal width of 10 metres and minimum formed width of 4 metres, with passing bays provided. The accesses would not generally meet this standard.
TRAN-S5 Design standard for a new vehicle crossing on a sealed road where the posted speed limit is 60km/hr or above	
All Zones	
Activity status when compliance not achieved: RDIS	**RD** The proposal does not comply with TRANS-S5. The proposal includes accesses to Mill Road, which is in a 60km/h zone. This requires accesses to be designed to comply with Diagram C (for four lots or less) and Diagram D (for five to nine lots). The proposed accesses would not comply with these requirements.

Natural Hazards	
Non-Coastal Hazards	
NH-R2 Natural hazard sensitive activities	
Non-Urban Flood Assessment Overlay	
Activity status where compliance with NH-R2 (1), NH-R2 (2)(b), is not achieved: RDIS	**RD**
	While future buildings containing natural hazard sensitive activities would be located outside a high hazard area and have minimum floor levels in accordance with district plan standards, the Applicant has not applied for a Flood Assessment Certificate – which is required to comply with the rule.
Activity status where compliance with NH-R2 (2)(a) is not achieved: NC	**NC**
	The proposal does not comply with NH-R2(2)(a) because no Flood Assessment Certificate has been issued.
NH-R4 Above ground earthworks, buildings and new structures	
Urban Flood Assessment Overlay Non-Urban Flood Assessment Overlay	
Activity status where compliance is not achieved: RDIS	**RD**
	The proposal does comply with NH-R4. In storm events such as the 0.5% AEP (200-year ARI) there is potential for an increase in off-site flooding. Based on modelling, there is a potential increase in flood levels on properties north of Mill Road predicted to be less than 10mm. No potential flooding for habitable dwellings is expected to increase greater than 20mm, and no critical infrastructure (roads) or cultural/heritage sites are expected to be impacted. Further, the topography of the site is proposed to be permanently altered.
NH-R5 Above ground critical infrastructure, excluding roads	
Urban Flood Assessment Overlay Non-Urban Flood Assessment Overlay	
Activity status where compliance is not achieved: RDIS	**RD**
	The proposal does not comply with rule NH-R5 2.a and 2.d because no Flood Assessment Certificate has been issued.

Sites and Areas of Significance to Māori	
SASM-R4 Earthworks and land disturbance associated with other activities	
Wāhi Tapu Overlay Wāhi Taonga Overlay Ngā Tūranga Tūpuna Overlay Ngā Wai Overlay	
Activity status when compliance not achieved or provided for: RDIS	**RD** Earthworks are not limited to the items listed at SASM-R4(1)(a-h).
Subdivision	
SUB-R5 Subdivision within flood hazard areas	
Non-Urban Flood Assessment Overlay	
Activity status when compliance with SUB-R4 (1) not achieved: NC	**NC** The site is within the Non-Urban Flood Assessment Overlay and does not comply with SUB-R4(1)
SUB-R6 Subdivision containing a site or area of significance to Māori	
Ngā Wai Overlay	
Activity status: RDIS	**RD** The site contains a Ngā Wai Overlay in respect of the Ōhoka Stream.
SUB-R7 Subdivision within the National Grid Subdivision Corridor	
Qualifying matter - National Grid subdivision corridor	
Activity status: RDIS	**RD** The proposal does not comply with all the standards SUB-S1 to SUB-S18.
SUB-R8 Subdivision and Major Electricity Distribution Lines	
All Zones	
Activity status: RDIS	**RD** The proposed subdivision is within 24 metres of the centreline of major electricity distribution lines that runs along Bradleys Road (noting that (a)-(c) of SUB-R8(1) do not apply) and does not comply with all standards SUB-S1 to SUB-18.

Earthworks	
EW-R5 Earthworks not subject to Rules EW-R1 to EW-R4	
All Zones	
Activity status when compliance not achieved: RDIS	**RD** The proposed earthworks do not comply with EW-S1 which requires the volume of proposed earthworks does not exceed that set out in Table EW-1.
EW-R8 Earthworks adjacent to a major electricity distribution line	
All Zones	
Activity status when compliance with EW-R7 (1) not achieved: RDIS	**RD** Earthworks are proposed beneath a major electricity distribution line.
EW-R9 Earthworks within a National Grid Yard	
All Zones	
Activity status: RDIS	**RD** Earthworks are proposed within the National Grid Yard.
EW-S2 General setbacks	
Activity status when compliance not achieved: RDIS	**RD** The proposal does not comply with rule EW-S2 which specifies that earthworks more than 300mm in height or depth must be set back a minimum of 2 metres from any boundary of a site in different ownership. There is a possibility of excavation depths greater than 300mm (subject to survey) along the 4-metre strip of land to vest along Bradleys and Whites roads to create level pedestrian/cycle paths. Further, proposed bunds associated with SMAs in Stage 1 would result in fill greater than 300mm within 2 meters of public roads (not private lots).
EW-S4 Excavation and filling	
Activity status when compliance not achieved: RDIS	**RD** The proposal does not comply with rule EW-S4 which limits earthworks to a maximum fill height of 1.5 metres and excavation depth of 2 metres. Proposed earthworks exceed those limits.

Light	
LIGHT-R3 General use of outdoor lighting	
All Zones	
Activity status when compliance not achieved: RDIS	**RD** The proposal may not comply with LIGHT-S1 which requires activities to comply with the standards specified in Table LIGHT-1. The proposal seeks that the lighting standards in Table LIGHT-1 apply as if the site is zoned General Residential or Large Lot Residential (in respect of the residential allotments), Local Centre (in respect of the commercial allotments) and Sport and Active Recreation (in respect the polo field allotment). As a result, outdoor lighting on future properties within the site may exceed the rural zone lighting limits.
Noise	
NOISE-R19 Activities emitting noise not otherwise covered in NOISE-R1 to NOISE-R13	
All Zones	
Activity status when compliance not achieved (where the activity exceeds the noise standards given in Table NOISE-2: Noise limits by less than 10 dB LAeq): RDIS	**RD** The proposal seeks that the noise standards in Table NOISE-2 apply as if the site is zoned General Residential or Large Lot Residential (in respect of the residential allotments), Local Centre (in respect of the commercial allotments) and Sport and Active Recreation (in respect the polo field allotment). As a result, noise emitted from future properties within the site may exceed the rural zone noise limits at notional boundaries.
Signs	
SIGN-R6 Any on-site sign	
Residential Zones, Commercial and Mixed Use Zones, Rural Zones, Industrial Zones, Open Space and Recreation Zones, Special Purpose Zone (Pines Beach and Kairaki Regeneration), Special Purpose Zone (Museum and Conference Centre), Special Purpose Zone (Kāinga Nohoanga), Special Purpose Zone (Pegasus Resort), Special Purpose Zone (Rangiora Airfield)	
Activity status when compliance not achieved: RDIS	**RD** The proposal does not comply with SIGN-S2 which sets out the maximum number, area, and height of signs per site. The proposal seeks that the sign standards in Table- SIGN-S2 apply as if the site is zoned General Residential or Large Lot Residential (in respect of the residential allotments), Local Centre (in respect of the commercial allotments) and Sport and Active Recreation (in respect the polo field allotment). As a result, signage on future properties within the site may exceed the rural zone restrictions.

Rural Lifestyle Zone	
RLZ-R3 Residential unit	
Activity status when compliance with RLZ-R3 (1), RLZ-R3 (2)(a), RLZ-R3 (3), RLZ-R3 (4), or RLZ-R3 (5) not achieved: NC	**NC** Future residential units would be on sites less than 4 hectares in area.
RLZ-R4 Minor residential unit	
Activity status when compliance not achieved: NC	**NC** Future minor residential units would be on sites less than 4 hectares in area.
RLZ-BFS1 Building coverage	
Activity status when compliance not achieved: RDIS	**RD** The proposal does not comply with RLZ-BFS1 because building coverage on the proposed allotments would likely exceed 20%.
RLZ-BFS2 Impermeable surface	
Activity status when compliance not achieved: RDIS	**RD** The proposal does not comply with RLZ-BFS1 because impermeable surface coverage on the proposed allotments would likely exceed 20%.
RLZ-BFS4 Building and structure setbacks	
Activity status when compliance not achieved: RDIS	**RD** The proposal does not comply with RLZ-BFS4 because future buildings would be located closer than 20 metres from road and internal boundaries.

281. The proposal has **non-complying** activity status under the POWDP.

Canterbury Land and Water Regional Plan

282. A compliance assessment against the rules of the LWRP is contained in **Appendix 36**. The proposal requires resource consent for the reasons set out in **Table 10** below.

Table 10 Reasons for consent under the LWRP

LWRP Rule	Activity Description	Activity Status
Rule 5.6	General Rule - earthworks in a river including reclamation, permanent diversion and realignment	**Discretionary**

Rule 5.93	Reticulated Stormwater Systems - Discharge of stormwater from a reticulated stormwater systems (operational stormwater discharge)	**Restricted Discretionary**
Rule 5.94B	Construction-phase stormwater discharge not from a reticulated system where one or more conditions of Rule 5.94A are not met	**Restricted Discretionary**
Rule 5.100	Other minor contaminant discharges where one or more conditions of Rule 5.98 or Rule 5.99 are not met - use of flocculants, and incidental groundwater discharge (potentially contaminated) during instream works.	**Discretionary**
Rule 5.105	The installation and use of a bore for community water supply. Currently the site contains contamination, however at the time of installation remediation will have occurred.	**Discretionary**
Rule 5.115	Community Water Take for water supply – A Water Supply Strategy is provided and additional water for other purposes are identified	**Restricted Discretionary**
Rule 5.120	Site dewatering (construction) involving groundwater where one or more conditions of Rule 5.119 are not met	**Restricted Discretionary**
Rule 5.127	Non-consumptive take and use of surface water (during works such as installing culverts) where one or more conditions of Rule 5.126 are not met.	**Non-complying**
Rule 5.128	Consumptive take and use of groundwater – for filling dust carts during construction (based on groundwater allocation not being fully allocated).	**Restricted Discretionary**
Rule 5.132	Non-consumptive take and use of groundwater where relevant conditions are not met - sub-soil drains under roads will discharge to SMA's and discharge to groundwater.	**Discretionary**
Rule 5.137	Installation of culverts in waterways. Notably that two culverts will exceed the permitted 25m length and culverts will be installed where the bed exceeds 5m in width.	**Discretionary**
Rule 5.141A	Structures in waterways where the activity does not comply with Rules 5.135 to 5.141 – for the installation of culverts (installation and associated discharge).	**Discretionary**
Rule 5.162	Removal and drainage of wetlands.	**Non-complying**
Rule 5.169	Riparian vegetation clearance and earthworks where one or more conditions of Rules 5.167 or 5.168 are not met.	**Restricted Discretionary**
Rule 5.176	Earthworks over aquifers where one or more conditions of Rule 5.175 are not met. Earthworks exceed volume, will be within 1m of the highest groundwater level and within 50m of a river.	**Restricted Discretionary**
Rule 8.5.12	Consumptive take and use of groundwater – for filling dust carts.	**Restricted Discretionary**

283. The proposal has **non-complying** activity status under the LWRP.

284. A 35-year consent duration is sought for the following activities:

- Non-consumptive groundwater take (section 14 Water Permit – ongoing take via sub-soil drains)

- Community water supply take (section 14 Water Permit)

- Discharge of groundwater to groundwater (non-consumptive) for sub-soil drainage (section 15 Discharge Permit)

- Operational stormwater discharge from the stormwater system (section 15 Discharge Permit)

285. All other regional activities for which consent is sought (i.e. construction related activities) would be managed through lapse provisions and conditions.

Activity Status

286. The proposal includes some activities that would be prohibited under the RMA, but which are eligible for approval under section 42(5) of the Act.

Wildlife Act 1953

287. Approval is sought under section 42(4)(h) (wildlife approvals as defined in clause 1 of Schedule 7) of the Act. 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.

288. It is an offence under sections 65(1)(f) and 70P of 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 set out in the description of the proposal, approval is sought for developing land where indigenous lizards are present in accordance with lizard management plan.

Fisheries Act 1996

289. The Fast-track Approvals Act 2024 requires that applications identify whether a proposal includes any standard freshwater fisheries activities and, where so, provide the information prescribed in Schedule 9, including for activities classified as "standard freshwater fisheries activities". In the present case, the proposal includes in-stream works associated with culvert installation that fall within the scope of standard freshwater fisheries activities, for which no separate approval is considered to be required under the Freshwater Fisheries Regulations 1983 (i.e. this application does not seek approvals for complex freshwater fisheries Approvals). The following assessment (drafted with the assistance of the Applicant's aquatic ecologist) is provided to clearly identify the nature and extent of the standard freshwater fisheries activities and to demonstrate that they do not trigger a requirement for a complex freshwater fisheries activity approval, and that fish passage and aquatic ecological values are appropriately considered.

290. The information required in Clause 9, Schedule 5 of the Act regarding standard freshwater fisheries activities is set out in **Table 11** below.

Table 11 Standard Freshwater Fisheries Activity assessment (Clause 9, Schedule 5)

<table>
<tr><th>Clause 9 (Sched. 5)</th><th>Information required</th><th>Application reference (document name, section, page)</th></tr>
<tr><td>9(a)</td><td>In relation to the structure and any fish facility:</td><td></td></tr>
<tr><td>9(a)(i)</td><td>Description of the type of structure or fish facility</td><td>Box culverts and circular culverts are proposed for road crossings of streams and artificial watercourses.</td></tr>
<tr><td>9(a)(ii)</td><td>Dimensions of the structure or fish facility</td><td>Internal roads (total of six road crossings):
(Note - Lengths of culverts and size and number will be finalised in detailed design)
<table>
<tr><th>Internal Culverts</th><th>Length</th><th>Size & Number</th></tr>
<tr><td>Ōhoka Tributary - culvert 09</td><td>11m</td><td>Two parallel box culverts – 4000mm x 2500mm</td></tr>
<tr><td>Northern Spring channel – culvert 07</td><td>11m</td><td>Single 1500mm x 1500mm box culvert</td></tr>
</table></td></tr>
</table>

Northern Spring channel – culvert 08	11m	Single 900mm x 900mm box culvert
South Ōhoka – Culvert 06	11m	Single 1500mm x 1500mmbox culvert
Unnamed Drain 1 - Culvert 10	11m	Three parallel 600mm diameter culverts
Unnamed Drain 1 – Culvert 11	14m	Three parallel 600mm diameter culverts

Culverts for the external boundary crossings (a total of 13 crossings, with 7 of these for roads, and 6 smaller culverts for driveway on Mill Road), majority of these are across artificial watercourses (not rivers):

(Note - Lengths of culverts and size and number will be finalised in detailed design)

External Culverts	**Length**	**Size & Number**
Mill Road Driveways: Lot 1000 (COAL) Lot 12 Lot 1001 (COAL) Lot 8 Lot 9 Lot 1002 (COAL)	 9m 4m 9m 4m 4m 14m	 900mm diameter
Mill Rd 01	36m	900mm diameter
Whites Rd 01	27m	4 Box culverts 2000mm x 800mm
Whites Rd 02	14m	900mm diameter (two parallel culverts)
Whites Rd 03	19m	900mm diameter (two parallel culverts)
Whites Rd 04	21m	900mm diameter
Bradleys Rd 01	17m	900mm diameter
Bradleys Rd 02	18m	800mm diameter (two parallel culverts)

9(a)(iii)	Design of the structure or fish facility	Indicative culvert design is provided – Proposed Stormwater Culvert Layout Plan (Sheets 1-12) (Ref 16013-00-RC-4400 to 16013-00RC-4413 Rev B Inovo Drawings) – **Appendix 27**.
9(a)(iv)	Placement of the structure or fish facility	The culverts will be installed within the stream bed, with at least 25% of the culvert's diameter below the level of the bed. The culverts will be laid parallel to the slope of the bed of the river. The bed substrate will be present over the full length of the culvert.
9(a)(v)	Water flows	The culverts will be designed and installed to mimic upstream and downstream flow velocities, in order to enable fish passage of species present.
9(a)(vi)	Operating regime	The culverts will operate passively, conveying baseflow and stormwater runoff in accordance with natural hydrological conditions. They do not include any active flow control structures. The culverts are designed to maintain hydraulic connectivity and fish passage, and substrate continuity. During high flow events, the culverts will convey peak flows without significant upstream impoundment. Routine operation requires no manual intervention, with periodic maintenance (e.g. debris removal) undertaken to ensure ongoing functionality.
9(b)	Freshwater species and values present (including threatened, data-deficient, and at-risk species per NZ	Section 3.2, para 4. P. 3, Fast Track Application – 531 & 535 Milll Road, Aquatic Ecology Assessment (Instream Consulting Ltd) identifies the fish fauna recorded for the site. The fish fauna identified was characteristic of stead spring-fed flows, stable banks and habitat structure and areas of gravel substrate.

	Threat Classification System)	Identified fish fauna and status: - Longfin eel (Anguilla dieffenbachia) had a threat classification (At Risk – Declining: Dunn et al. 2017). - Upland bully: Gobiomorphus breviceps (Not Threatened) - Shortfin eel: A. australis), or 'Introduced (Not Threatened) - Naturalised brown trout: Salmo trutta (Not Threatened) Fish surveys did not identify the presence of the critically endangered Canterbury mudfish (Galaxias burrowsius). This species is not considered present within the Site, based on the absence in the fish catch, but also the high predation from the introduced brown trout and native eels, which were identified as being widespread within the Site's waterways. No specific surveys for large macroinvertebrates (koura/freshwater crayfish) or kakaki/freshwater mussel) were undertaken and no incidental discovery of these species occurred during benthic macroinvertebrate surveys or fishing efforts. Based on habitat type it is considered likely koura are present. Both species will be considered within the Ecological Management Plan and potential salvages, and their potential habitat enhanced as part of the proposal.
9(c)	Water quality and quantity in the surrounding habitat (at the structure location, upstream and downstream)	Surface Water Quality is set out in Section 3.3, P. 6, Fast Track Application – 531 & 535 Milll Road, Aquatic Ecology Assessment (Instream Consulting Ltd). Surface Water Quantity is discussed in the Ecological Values Assessment (Section 4) of the Aquatic Ecology Assessment (Instream Consulting Ltd) noting that flows for streams are taken from the Hydrology Assessment (2025) prepared by PDP.
9(d)	How passage of fish will be provided for or impeded	Section 5.3.1, P. 24, Fast Track Application – 531 & 535 Milll Road, Aquatic Ecology Assessment (Instream Consulting Ltd) provides discussion regarding fish passage. It is proposed that instream works within the Ōhoka Stream Tributary or South Ōhoka Branch would be undertaken outside of the trout spawning season (1 May – 31 October), and the works would be isolated (i.e. pump and bypass of works area or diversion) with associated fish salvage. The final culvert designs will be reviewed by a suitably qualified freshwater ecologist to ensure that the requirements of the NES-F Clause70 are met, and that New Zealand Fish Passage Guidelines (NIWA 2025) are achieved where practicable. Proposed draft conditions for the application include preparation of the following: - Streamworks Management Plan. This plan requires construction details and methodologies for instream works, culvert designs and provision of fish passage and fish salvage. - Ecological Management Plan. This plan requires, among other things, a stream restoration and enhancement plans including provision of fish passage within all enhanced, created and restored streams as well as all associated structures. The Ecological Management Plan is to be prepared by a suitably qualified and experienced person.

Heritage New Zealand Pouhere Taonga Act 2014

291. Approval is sought under section 42(4)(i) of the Act (an archaeological authority described in section 44(a) or (b) of the Heritage New Zealand Pouhere Taonga Act 2014 (**Heritage NZ Act**) that would otherwise be applied for under that legislation). This approval may only be sought when the substantive application also seeks approval for a resource consent (as it is here) or a designation.

292. Under the Heritage NZ Act, the authority would be required under section 44(a) for an activity that would destroy the recorded archaeological site.

293. As described in the 'proposal' section, approval is sought for developing land that contains remnants of the Ōhoka Railway Station, and potentially other undiscovered archaeological sites, in accordance with an archaeology management plan included at **Appendix 12**.

294. Section 45 of the Heritage NZ Act requires that any person undertaking the activity be approved. That person must possess sufficient skill and competency, be fully capable of ensuring the activity is carried out to the satisfaction of Heritage NZ, and have access to appropriate institutional, professional, and resource support. Where the site is of interest to Māori, the person must also demonstrate the necessary competencies to recognise and respect Māori values and have access to appropriate cultural support. Clause 7 of Schedule 8 of the Act provides for this approval which is sought as part of this application. The required information is contained in the archaeology assessment (**Appendix 12**).

RMA Approvals Assessment Considerations

Application Requirements

295. 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—*
>
> *(i) includes the information required by clause 6; and*
>
> *(ii) covers the matters specified in clause 7.*

296. 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.*

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

298. 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.

Effects and Policy Assessment

299. The following assessment considers all the relevant environmental effects and the relevant resource management policy as directed by Schedule 5 of the Act. In terms of environmental effects, the assessment applies the *Hawthorn*[10] tests such that the environment includes its current state including permitted activities under the district plan and activities authorised by resource consent, where implementation is likely.

300. The Act does not provide for the rural zoning of the site to be changed, but the project would nevertheless result in a comprehensive urbanisation of the site. The application is, in large part, a plan change by resource consent alongside the subdivision component. The nature and scale of proposed land use change is not anticipated by the relevant RMA planning documents that provide the resource management policy direction and, in turn, guide the assessment of environmental effects. Therefore, it is expected that the proposal

[10] *Queenstown Lakes District Council v Hawthorn Estate Ltd* [2006] NZRMA 424 at [84].

would be inconsistent with several relevant objectives and associated policies and generate adverse effects at a level beyond those that would typically be tolerated in the zone.

Conditions of Consent

301. Section 85(3) of the Act relates to panel decisions. The duty under section 5 of the RMA (as referenced to in the Act) to avoid, remedy or mitigate adverse effects must still be "taken to account" under the Act[11]. In this regard, sections 108 and 108AA of the RMA (as referenced in the Act) provide the basis for imposing conditions of consent that would avoid, remedy or mitigate any adverse effects. The Act applies an additional limitation on condition setting in section 83 which requires that a condition cannot be more onerous than necessary to address the reason for which it is set.

302. Section 84A allows the panel to set conditions to ensure infrastructure is or can be adequate to support the proposed subdivision and development. Such conditions can only bind the Applicant.

303. Proposed conditions referred to in the following assessment are included at **Appendix 43** (conditions to be administered by the District Council) and **Appendix 44** (conditions to be administered by the Regional Council).

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

Assessment of Environmental Effects

Scope of Assessment

304. This assessment is undertaken in accordance with clause 7 of Schedule 5 of the Act as set out at paragraph 298. Taking guidance from the relevant statutory planning documents, including objectives, policies, rules, and the associated matters of discretion or control, several specific actual or potential effects of the activity have been identified as follows:

- urban form
- loss of agricultural production
- transport
- character and amenity
- urban design
- geotechnical and section 106 matters
- land contamination
- natural hazards
- infrastructure
- aquatic ecology
- groundwater / hydrology
- terrestrial wildlife
- reverse sensitivity
- sites of significance to iwi and cultural considerations
- economic
- education
- historic heritage
- construction activities

305. Adverse effects in the below assessment are considered in accordance with the continuum contained in **Table 12** below.

Table 12: Terminology to describe the significance of an effect

Effect significance descriptor	Meaning
Nil effects	No adverse 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 an undesirable impact but could potentially be mitigated or remedied.
Significant adverse effects (that could be remedied or mitigated)	Adverse effects that are noticeable and would have serious adverse impacts 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

Urban Form

306. Ōhoka is not identified as a location for urban growth and given the large scale of the proposal, it represents a significant change to the planned urban form for the district and Greater Christchurch sub-region. As assessed later in the statutory analysis section, the proposal is found to be contrary to RPS provisions that direct where urban growth is to be located. Further, the proposal does not align well with the non-statutory direction in Greater Christchurch Spatial Plan (**GCSP**) and the District Council's development strategy in respect of the location of urban growth.

307. While the proposal represents a departure from the planned urban form of the district and Greater Christchurch, the following analysis finds that the urban form related effects are acceptable.

308. The District Council's current strategy is to accommodate predicted population growth predominately in the main urban centres. While these centres have capacity to accommodate predicted growth, a survey commissioned by the Applicant in 2024[12] indicates that there is strong demand for Ōhoka relative to other areas in the Waimakariri District, and that further residential development in Ōhoka would likely be met with significant demand. It demonstrates that there are market segments that prefer to live outside the within the main centres of the district with Ōhoka ranking as the third preferred place to live, behind Rangiora and Kaiapoi, with 21% of survey respondents nominating it as their first choice. This placed Ōhoka ahead of other urban areas and settlements like Pegasus, Woodend, Tuahiwi, and Oxford. Further, the preference for Ōhoka was highest

[12] The research was presented as evidence during the hearings on the Proposed Waimakariri District Plan – see the evidence of Carl Davidson in Hearing Stream 12D. See **Appendix 40** and www.waimakariri.govt.nz/__data/assets/pdf_file/0021/164631/STREAM-12D-E1-SUB-237-and-160-CARTER-RIDL-EVIDENCE-CARL-DAVIDSON-.pdf

among participants in the family-raising stage (aged 25-44 years old). It also showed stronger appeal among respondents with household incomes between $100,000 and $150,000, and those over $150,000.

309. The survey research corroborates real estate advice from Bayleys in 2024[13] that there is high demand for residential housing in the Ōhoka area, particularly when compared to other townships in the Waimakariri District, such as Kaiapoi and Rangiora. The key aspects of the advice include:

- Most buyers seeking residential properties or sections in the Waimakariri District would consider or prefer Ōhoka due to its amenity, mature trees, and proximity to Christchurch CBD. Bayleys is confident that if sections were available in Ōhoka, a high proportion would sell before those that are available in Kaiapoi or Rangiora.

- Bayleys receives consistent enquiries for Ōhoka properties. Realestate.co.nz data confirms this, showing Ōhoka as the number one most searched rural suburb in Canterbury consistent with Bayleys' experience.

- There is a lack of supply in Ōhoka. Currently, very few residential-sized properties are available, forcing buyers to either purchase large lifestyle blocks (minimum 4 hectares) or seek alternatives in adjacent areas like Mandeville or Fernside. These buyers generally would not substitute Ōhoka for properties in Rangiora or Kaiapoi. Bayleys considers Ōhoka is an unrealised market for smaller residential sections.

- Recent sales in Ōhoka have demonstrated strong demand, including properties receiving multiple bidders at auction and selling off-market for higher-than-expected prices.

- Bayleys has high confidence that the residential product that would result from approving the application would be in high demand. It considers that the proposed residential sections offer the amenity of Ōhoka without requiring buyers to manage hectares of land. Further, the proposed local centre amenities are expected to increase desirability.

310. If the demand identified by the survey research and as per the real estate advice is to be accommodated, the proposed approach by way of a master-planned expansion of the existing urban area, is considered preferable compared to continued rural residential / lifestyle development, because it:

    - concentrates the population which in turn increases the viability of providing day-to-day type goods and services, local schooling, healthcare facilities, and local reserves and recreation facilities,

    - leverages the social fabric and networks of existing communities,

[13] The advice was presented as evidence during the hearings on the Proposed Waimakariri District Plan – see the evidence of Chris Jones in Hearing Stream 12D. See **Appendix 41** and www.waimakariri.govt.nz/__data/assets/pdf_file/0029/160679/Evidence-of-Chris-Jones-Ohoka-rezoning.pdf and www.waimakariri.govt.nz/__data/assets/pdf_file/0027/163818/STREAM-12D-E1-SUB-237-and-160-CARTER-RIDL-SUPPLEMENTARY-EVIDENCE-SUPPLEMENTARY-EVIDENCE-CHRIS-JONES.pdf

- provides more affordable housing options,
- makes efficient use of existing infrastructure (acknowledging that upgrades would likely be required), and
- provides for higher densities which:
    i. is a more efficient use of land,
    ii. provides for walkable communities and the ability to service the population with public transport in the future, and
    iii. are less carbon intensive.

311. The following spatial planning analysis considers constraints to guide the identification of areas of the district that may be suitable to accommodate growth and confirm Ōhoka as an appropriate option. A similar approach was applied in developing the 2019 Waimakariri Rural Residential Development Strategy and the GCSP. The analysis also considers the statutory framework which provides direction for the identification of future growth areas. The analysis only considers the area of the district within the 'Christchurch' urban environment[14] as per the National Policy Statement on Urban Development 2020 (**NPS-UD**).

Development Constraints

312. A series of maps showing development constraints affecting the district are included at **Appendix 37**. The constraints mapping is generally consistent with that in Part 1 (Areas to protect, avoid and enhance) of the GCSP. The constraints considered include susceptibility to liquefaction, coastal inundation, tsunami, flooding, productive soils, sites and areas of significance to Māori, noise generating activities, and reserves. The combined constraints map in the appendix (and below at **Figure 6**) overlays all the individual constraint layers.

313. The constraint layers were sourced from the following:

- Eastern Canterbury Liquefaction Susceptibility Study (2012): Areas identified where the risk of possible damage from liquefaction.
- District Council Flood Hazard Modelling: all 1:200-year flood events medium and high flood hazard and 1:500-year event high flood hazard.
- Canterbury Tsunami Evacuation Zones published by the Regional Council: yellow, orange and red zones.
- Land Use Category 1, 2 and 3 soils within rural zoned land, excluding the Rural Lifestyle Zone, as per the National Policy Statement on Highly Productive Land (**NPS-HPL**). Land Use Category 1 and 2 soils elsewhere in recognition that these are versatile soils as defined in the RPS.

[14] Which is the Greater Christchurch sub-region as indicated on Map A of the RPS.

- Proposed Plan[15]:
    i. Special Purpose Zone Kainga Nohoanga.
    ii. Natural Open Space Zone.
    iii. Open Space Zone.
    iv. Sport and Active Recreation Zone.
    v. Sites and Areas of Significance to Māori.
- Noise Contours:
    i. Speedway Noise Avoidance Contour (Proposed Plan).
    ii. Rangiora Airport Noise Avoidance Contour (Proposed Plan).
    iii. 50dBA Ldn airport noise contour for Christchurch International Airport as indicated on Map A of the RPS and the CIAL combined 50dBA noise contour published May 2023 and digitised from the relevant Marshall Day Acoustics report.

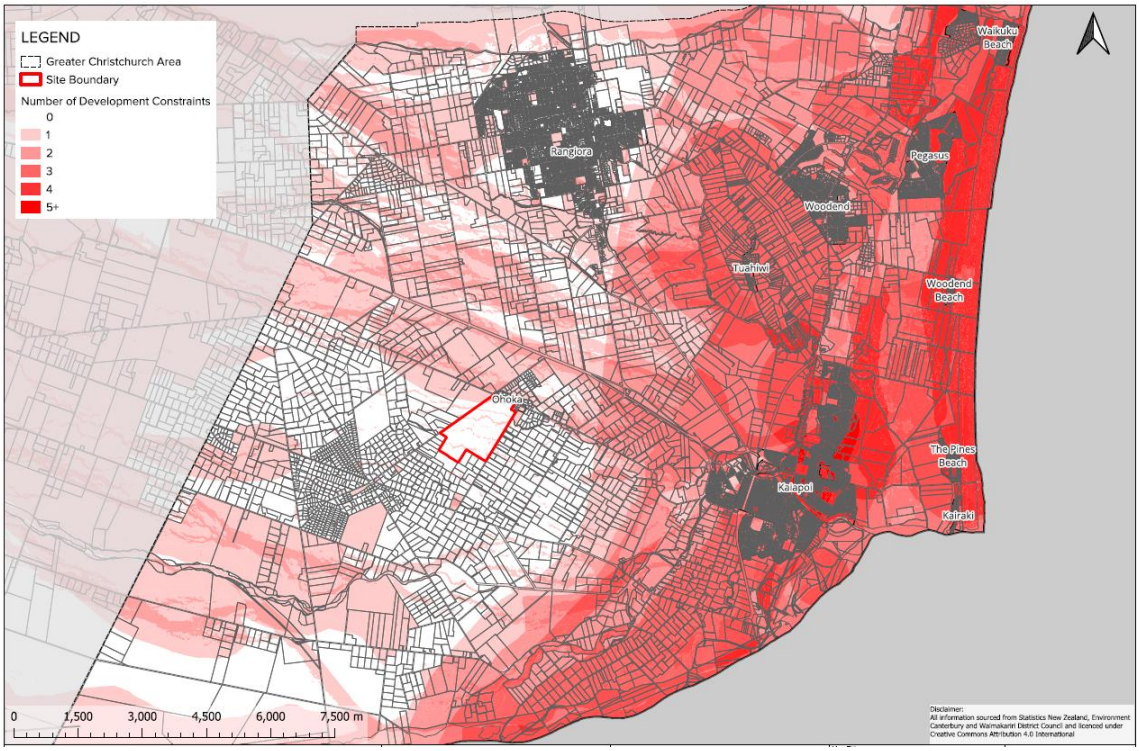

Figure 6: Combined constraints map

[15] While the Proposed Plan has been made partially operative, we understand the spatial information from the Proposed Plan remains accurate for this exercise.

314. Care was taken to ensure there is no 'double counting' of constraints. For example, given the flood modelling carried out by District Council includes coastal inundation, this was not included in the combined constraints.

315. Overlays of the future development areas are sourced from the District Council GIS.

316. All base information has been sourced from district and regional council open-source GIS databases and processed using QGIS to determine overlaps between multiple constraint layers.

317. Each of the individual constraints are discussed below.

Reserves

318. The POWDP includes three different types of open space and recreation zones as follows:

- Natural Open Space Zone;
- Open Space Zone; and
- Sport and Active Recreation Zone.

319. As per the description in the POWDP, these zones are almost entirely comprised of public land to provide for open space and recreation areas to benefit the health and well-being of the people and communities of the district. Much of the open space zoned land is held under the Reserves Act 1977 and managed/preserved according to its purpose. Open space zoned land and/or reserves are not typically available for development. Further, it would not be appropriate in most instances to develop this land. For these reasons, open space zoned land is included as a constraint on development.

320. Utility reserves are also included as a constraint because they are not typically available for development.

Flooding

321. The RPS addresses flood hazard using a two-tiered approach. The first tier relates to high hazard areas where new subdivision, use and development in these areas is to be avoided unless it meets the criteria listed in policy 11.3.1. The definition of high hazard is reproduced below.

> *"High hazard areas" are:*
>
> 1. *flood hazard areas subject to inundation events where the water depth (metres) x velocity (metres per second) is greater than or equal to 1, or where depths are greater than 1 metre, in a 0.2% AEP flood event;*
> 2. *land outside of greater Christchurch subject to coastal erosion over the next 100 years;*
> 3. *land within greater Christchurch likely to be subject to coastal erosion including the cumulative effects of sea level rise over the next 100 This includes (but is not limited to) the*

land located within Hazard Zones 1 and 2 shown on Maps in Appendix 5 of this Regional Policy Statement that have been determined in accordance with Appendix 6; and

4. *land subject to sea water inundation (excluding tsunami) over the next 100 years. This includes (but is not limited to) the land located within the sea water inundation zone boundary shown on Maps in Appendix 5 of this Regional Policy Statement.*

When determining high hazard areas, projections on the effects of climate change will be taken into account.

322. The second tier of flood hazard avoidance in the RPS relates to areas subject to inundation by a 0.5% AEP flood event (accounting for climate change projections) where new subdivision, use and development is to be avoided unless there is no increased risk to life, and the subdivision, use or development (policy 11.3.2):

1. *is of a type that is not likely to suffer material damage in an inundation event; or*

2. *is ancillary or incidental to the main development; or*

3. *meets all of the following criteria:*

   a. *new buildings have an appropriate floor level above the 0.5% AEP design flood level; and hazardous substances will not be inundated during a 0.5% AEP flood event;*

   b. *provided that a higher standard of management of inundation hazard events may be adopted where local catchment conditions warrant (as determined by a cost/benefit assessment).*

323. At the district level, the District Council has identified areas it considers are subject to flood hazard and categorised them by high, medium and low risk. In accordance with the RPS, the POWDP generally seeks to avoid development in the high-risk areas (as indicated in red on the flood hazard constraint map in **Appendix 37**), noting that allowance is made for development within urban areas that meet certain criteria. Outside those areas (i.e. in the medium and low risk categories), the POWDP provides for development where:

1. *the nature of the activity means the risk to life and potential for building damage from flooding is low; or*

2. *minimum floor levels are incorporated into the design of development to ensure building floor levels are located above the flood level so that the risk to life and potential for building damage from flooding is mitigated; and*

3. *the increase in risk from flooding on surrounding properties is no more than minor and the net flood storage capacity is not reduced; and*

4. *the conveyancing of flood waters is not impeded.*

324. An extensive area of the district is at risk of flooding. It is understood that satisfying the above criteria is most often readily achievable in the low-risk areas but can be more difficult to satisfy within the medium risk areas. This is particularly the case in respect of large-scale development where required mitigation would likely significantly reduce the developable

area. On this basis, uncertainty exists in respect of development in the medium risk areas (as indicated in blue on the 1:200-year flood hazard constraint map).

Coastal Hazards

325. The RPS addresses coastal erosion and seawater inundation hazards also via the 'high hazard area' definition and policy 11.3.1 (avoidance of inappropriate development in high hazard areas) and includes the following explanation:

> *Coastal erosion is a major issue in parts of Canterbury. New development such as residential, commercial and industrial activity is not sustainable in areas subject to erosion over the next 100 years. Sea water inundation has occurred, and will continue to occur, in many coastal areas of Canterbury. Sea water inundation can occur due to a number of different factors, including coastal erosion and storm-surge. Many activities are not sustainable in these areas and should be avoided.*

326. The POWDP identifies a Coastal Flood Assessment overlay within which policy NH-P16 encourages redevelopment or land use changes that reduce the risk of adverse effects including managed retreat and designing for relocation or recoverability from natural hazard events. Further urbanisation within areas affected by these hazards ought to be discouraged, particularly given climate change induced sea level rise will only exacerbate the potential impacts.

327. Another coastal hazard is tsunami. These do not occur often but can have severe impacts. The RPS notes that tsunamis have affected the Canterbury coastline in 1868, 1877, 1960 and 2010.

328. The RPS seeks to avoid new subdivision, use and development of land that increases risk of natural hazards to people, property and infrastructure or mitigate the risk where avoidance is not possible as directed by objective 11.2.1. While land subject to sea water inundation is included in the high hazard area definition, tsunami is excluded. Further, unlike earthquakes, flooding, coastal erosion and sea water inundation, there is no specific policy direction for tsunami hazard. Instead, it is captured by policy 11.3.5 which provides a risk management approach for natural hazards not specifically addressed. That policy seeks that subdivision, use or development of land be avoided if the risk from the hazard is unacceptable. While the RPS states that the likelihood of tsunami is not high enough to warrant avoidance of further development in affected areas, the policy directs the District Council to adopt a precautionary approach. A precautionary approach is becoming increasingly important in light of predicted climate change induced sea level rise which will exacerbate the impact of tsunamis.

329. The Canterbury Tsunami Evacuation Zones have been used to represent a potential constraint on development. While there are no planning documents that reference these zones, they are relevant to planning consideration. Current tsunami modelling is not sufficiently robust to include in district plans, but it is the best information available to help inform zoning decisions. Giving the modelling some consideration is preferable to ignoring the issue altogether.

Noise Generating Activities

330. The RPS requires that strategic infrastructure (including Christchurch International Airport) is not compromised by urban growth and intensification. In respect of aircraft noise, policy 6.3.5(4) seeks the avoidance of:

> *noise sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport, unless the activity is within an existing residentially zoned urban area, residential greenfield area identified for Kaiapoi, or residential greenfield priority area identified in Map A*

331. The 50dB Ldn airport noise contour for Christchurch International Airport as indicated on Map A in the RPS (and POWDP) is included on the relevant constraints map in **Appendix 37**. However, the noise contours have recently been remodelled (remodelled contours) to account for changes in runway capacity, aircraft traffic projections, flight track assumptions, noise modelling and aircraft technology. The 50dB Ldn remodelled contours represents the most up-to-date information about noise effects. It is therefore shown on the relevant constraint map. However, taking a conservative approach, it is not included on the combined constraints map.

332. In addition to 50dB Ldn airport noise contour, the constraints map also includes the Rangiora Airfield noise contour given that policy NOISE-P5 of the POWDP seeks to:

> *Avoid the development of noise sensitive activities in the Rural Lifestyle Zone within the 55 dB Ldn Noise Contour for Rangiora Airfield and prohibit noise sensitive activities within the 65 dB Ldn Noise Contour for Rangiora Airfield.*

333. In relation to the Woodford Glen Speedway at 39 Doubledays Road, the POWDP includes a noise contour within which residential activity is a non-complying activity (see rule NOISE-R24). While there are no explicit policy references to the Speedway Noise Avoidance Contour, there is general policy support relating to it. For this reason, this noise contour is also included on the relevant constraint map.

Productive Soils

334. As indicated on the soil resource constraint map in **Appendix 37**, a significant area of the district has Land Use Category 1, 2 and 3 soils. The NPS-HPL applies to those soils within rural zoned land, excluding the Rural Lifestyle Zone (as discussed at paragraph 378). The objective of the NPS-HPL is that:

> *Highly productive land is protected for use in land-based primary production, both now and for future generations.*

335. Policies 5, 7 and 8 seek that urban rezoning, subdivision and use of highly productive land is avoided except in relation to proposals that satisfy a stringent criterion. On this basis, all highly productive land (as defined by the NPS-HPL) is shown as a constraint for future urbanisation.

336. Further, policy RURZ-P2 of the POWDP seeks to:

Maintain the availability and life supporting capacity of land in recognition of its importance for undertaking primary production, and to maintain or enhance natural environment values in Rural Zones…

337. Outside the area subject to the NPS-HPL, the constraint map includes LUC 1 and 2 soils (i.e. versatile soils).

Sites and Areas of Significance to Māori

338. The Kāinga Nohoanga Special Purpose Zone adjoining Woodend and sites/areas of significance to Māori are included on the relevant constraints map in **Appendix 37**. While these do not preclude development, they create uncertainty and potential development barriers.

339. The Kāinga Nohoanga Special Purpose Zone occupies a large area between Rangiora, Woodend and Kaiapoi and its purpose is to provide for activities within Māori Reserve 873. It enables the development of Māori land for a wide range of activities. Rural and residential land uses are provided for in respect of non-Māori land. The density of residential development is governed depending on location. The highest density is directed towards the Tuahiwi Precinct, rural residential development in the Large Lot Residential Precinct, and rural lifestyle density (four hectare minimum) outside the precincts. Further, a range of small-scale commercial activities are also provided for on non-Māori land within the Tuahiwi Precinct.

340. The purpose of the Kāinga Nohoanga Zone, and land ownership within it, create potential development barriers and uncertainty, particularly for larger scale urban development.

341. The POWDP also identifies sites and areas of cultural significance to Ngāi Tūāhuriri grouped into the following:

wāhi tapu and wāhi taonga – are treasured places that include wāhi tapu, which are sites and places that are held in reverence due to their significance according to whakapapa (including urupā, pā, maunga tapu, kāinga, and tūranga waka). In addition to wāhi tapu, other places are treasured due to their high intrinsic values or their capacity to sustain the quality of life and provide for the needs of present and future generations (including areas important to support ecosystems and sites related to food gathering and cultural resources);

ngā tūranga tūpuna – larger extents of land within which there is a concentration of wāhi tapu or taonga values, or which are of particular importance in relation to Ngāi Tūāhuriri cultural traditions, history or identity; and

ngā wai – is water and represents the essence of all life, is integral to tribal identity, and source of mahinga kai.

342. Subdivision within the Wāhi Tapu, Wāhi Taonga, Ngā Tūranga Tūpuna and Ngā Wai overlays is a restricted discretionary activity in the POWDP with the District Council's discretion limited to protection of sites/areas of significance to Ngāi Tūāhuriri and mitigation of effects on wāhi taonga. The appropriateness of larger scale urban development would depend on the location and specifics of the proposed development. Therefore, prior to site

specific consultation with Ngāi Tūāhuriri, these planning overlays create a level of uncertainty for larger scale urban development.

Susceptibility to Liquefaction

343. Areas susceptible to liquefaction are not included in the high hazard areas. Instead, RPS policy 11.3.3 seeks that new subdivision, use and development in areas susceptible to liquefaction be managed to avoid or mitigate adverse effects. A similar approach is taken in the POWDP whereby subdivision is managed in respect of liquefaction to ensure that the risk to life and property is low.

344. Liquefaction resulting from the 2010/11 Canterbury earthquakes severely impacted buildings, infrastructure, people and communities in extensive areas of Greater Christchurch. As stated in the RPS, most of the damage to houses and infrastructure during the Canterbury earthquake was caused by ground damage due to liquefaction (and lateral spreading), rather than ground shaking. Based on that experience, exposure to this hazard would ideally be limited as much as possible. Given a choice between developing land where liquefaction damage has been identified as possible or unlikely, it is preferable to develop the least at-risk land.

Other Constraints

345. Highly fragmented land, particularly in different ownership, can impose significant constraints on land development due to several factors including (but not limited to):

- Smaller parcel sizes, which can limit the feasibility and efficiency of development projects.

- Multiple owners, who would likely have different plans, priorities, or timeframes for land development, or no plans for development.

- Disruption to connectivity within and beyond development projects. Disjointed parcels can hinder the establishment of coherent transportation networks, utility systems, and other infrastructure.

- Increased costs given fragmented land often requires negotiations and coordination among multiple landowners to assemble contiguous parcels for larger-scale development. These transactions can be time-consuming, complex, and costly, involving planning and legal advice and surveying.

Development Opportunities

Statutory Directions

346. Several statutory documents provide direction as to the location for urban growth. At the top of the hierarchy, is the NPS-UD. Policy 1 (reproduced below) sets out what constitutes well-functioning urban environments and requires planning decisions contribute to such environments.

> *Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

a) *have or enable a variety of homes that:*

(i) *meet the needs, in terms of type, price, and location, of different households; and*

(ii) *enable Māori to express their cultural traditions and norms; and*

b) *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*

c) *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*

d) *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*

e) *support reductions in greenhouse gas emissions; and*

f) *are resilient to the likely current and future effects of climate change.*

347. Several of these matters are relevant to consideration of the suitability of the location of new urban development. Also relevant, is the ability to service an area with the necessary horizontal infrastructure as reflected in the NPS-UD and RPS.

348. The RPS is directive in terms of where urban development can be located within Greater Christchurch specifying that it only occur within existing urban areas or identified greenfield priority areas as shown on Map A, and in Future Development Areas subject to certain circumstances (policies 6.3.1 and 6.3.12). It also directs that intensification should be focused within central Christchurch, the Key Activity Centres and neighbourhood centres (policy 6.3.7).

349. In terms of identifying new residential development areas within Greater Christchurch, policy UFD-P2(2) of the POWDP requires that significant development capacity is provided in accordance with the NPS-UD and:

- *be integrated with infrastructure planning and funding decisions by occurring in a manner that makes use of existing and planned transport upgrades, including public transport, and three waters infrastructure, or where such infrastructure is not available or planned, upgrades, funds and builds infrastructure as required;*

- *occur in an area that is well connected along transport corridors which has good accessibility for all people to housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;*

- *concentrate higher density residential housing in locations that focus on activity nodes including key activity centres, schools, public transport routes and open space;*

- *take into account the need to provide for intensification of residential development while maintaining appropriate levels of amenity on surrounding sites and streetscapes;*

- *support reductions in greenhouse gas emissions;*

- *be resilient to natural hazards and the likely current and future effects of climate change as identified in SD-O6;*

- *avoid highly productive land, except as provided for under the NPS-HPL;*

- *avoid or mitigate reverse sensitivity effects on primary production activities, industrial activities and strategic infrastructure; and*

- *be informed through the development of an ODP.*

350. As demonstrated by the combined constraints map at **Appendix 37** and the GCSP, urban growth is restricted. While some of the identified constraints are potentially negotiable, others are far more difficult and/or prohibitively costly to overcome.

Discussion

351. The least constrained area of the district, which is in the general vicinity of Ōhoka and Mandeville, is not an area anticipated for new urban development or expansion.

352. Focusing on the area within the urban environment outside the main towns, the most logical locations to accommodate the required development capacity are the existing settlements of Waikuku Beach, the Pines Beach, Kairaki, Woodend Beach, Tuahiwi and Ōhoka which are all identified in the RPS as existing urban areas. However, expansion of all these settlements, except for Ōhoka, is impacted by the previously outlined development constraints. In particular, the coastal settlements are subject to high flooding hazard which poses a significant hurdle for urbanisation.

353. While not identified as existing urban area, Mandeville appears at face value to be a potential location to accommodate residential capacity. This area comprises very low-density housing centred around a local centre. Significantly intensifying and/or expanding Mandeville would not be feasible, principally because of the high level of land fragmentation. Further, a large reserve extending between Mandeville Road and North Eyre Road prevents development of less fragmented land to the southeast of Leyland Crescent and Truro Close. Regardless of feasibility considerations, creating a well-functioning urban settlement within the confines of Mandeville would be significantly challenging.

354. By contrast, the development at Ōhoka provides a large contiguous area of land adjoining the existing urban area that can be developed comprehensively and in a timely manner. The suitability of the proposal to provide the required additional development capacity is considered below in the context of the NPS-UD policy 1 criteria for well-functioning urban environments.

Subclause (a) – Variety of Homes

355. The proposal would add significantly to development capacity within the context of Ōhoka and the district and provides a greater variety of housing at higher density compared than the current stock in the area. While future properties may not be within the 'affordable' range[16] – acknowledging that this is a nationwide issue – they would be more affordable

[16] In terms of the accepted standard measure of affordability (three times median incomes).

compared to the existing offering which comprises predominately rural residential and rural lifestyle properties. Further, as per the assessment of Market Economics (**Appendix 2**) additional dwelling stock enabled by the proposal would assist with housing affordability district wide by introducing more competition into the market.

356. Further, the proposal would enable Māori to express their cultural traditions and norms, to the extent relevant to the site context.

Subclause (b) – Variety of Business Sector Sites

357. Provision for local convenience goods and services for existing and future residents of Ōhoka is enabled via the proposed commercial super lots including the possible hosting of the farmers market during winter months. A variety of sites would be made available to meet demand and therefore business needs at the local scale. Beyond Ōhoka, the nearby Rangiora, Kaiapoi and Christchurch provide a wider offering.

Subclause (c) – Good Accessibility

358. In general, the site is well-connected along existing transport corridors. The site is close to State Highway 1 which is accessed via collector roads (Bradleys and Mill) and district arterial roads (Tram and Ōhoka). The site is also well connected via collector and arterial roads to the urban centres of the district.

359. Specifically, this subclause is concerned that people have good accessibility between where they live and where they work, access community services[17], and to recreational opportunities (in terms of access to natural and open spaces). It is also concerned that the accessibility is multi-modal.

Accessibility between home and work

360. The proposal provides for an acceptable level of accessibility for future residents between their homes and their jobs. In the context of the district, it may be more likely that a larger proportion of residents within the site would work in Christchurch rather than Rangiora or Kaiapoi. Regardless, driving distances to any of these locations are reasonable.

361. Park and ride facilities for express bus services into central Christchurch are available in Kaiapoi and Rangiora. Otherwise, the site is a cyclable distance to Rangiora and Kaiapoi for some. And for others who choose to cycle to work in Christchurch, Rangiora or Kaiapoi, it is unlikely that they would take up residence in Ōhoka.

362. Work from home is also a relevant consideration. According to the Commuter Waka website (which uses 2018 Census data), 18% of people work from home in the Mandeville-Ōhoka area. This percentage is substantially higher (roughly 8-9%) than Rangiora, Kaiapoi and Woodend. The proposal would likely introduce a more diverse demographic to the area, and one might expect this to result in a decrease in the proportion of people working from home relative to those working in the main centres. However, it is not unreasonable to assume that the percentage will remain higher than the main centres – and it may increase over time depending on labour market trends. It is also notable that 35% of

[17] The NPS-UD defines community services as community facilities, educational facilities, and those commercial activities that serve the needs of the community

workers living in the Mandeville-Ōhoka area commute to their place of work within the area. This percentage is comparable to the Kaiapoi figure of 38%, but lower than the Rangiora figure of 61%[18].

Accessibility to community services

363. In terms of accessibility to community services, the proposed local centre would likely be anchored by a supermarket and is expected to accommodate a small mix of food and beverage retail activity (takeaways, cafes, restaurants/bar), commercial services (such as a hair salon, beauty salon, vets), maybe health care facilities (such as a medical centre), potentially a preschool (as seen in Mandeville), and any complementary convenience retail, such as a chemist (particularly if medical centre is provided). This is in addition to existing facilities in Ōhoka.

364. This sort of offering provides good accessibility to many, but not all, community services. In respect of the community services that are unlikely to be provided in Ōhoka, it is likely that residents would plan their daily/weekly trip-making and include more trip linking. For example, the journey to work is also linked to a journey to a retail destination, prior to returning home.

365. In terms of schooling, primary school students (more likely the older ones) would be able to bike and/or walk to Ōhoka School via an off-road path along Mill Road (which could be upgraded) including recommended crossing facilities across Whites Road. In terms of secondary schooling, it is common for students to travel further to school, and there is already a school bus route to Kaiapoi High School that runs through Ōhoka along Mill Road.

Accessibility to natural and open spaces

366. Ōhoka is well endowered with open space, owing mainly to the large domain adjacent the site. Natural spaces are also present including the Ōhoka Stream Walkway which runs along the true left of Ōhoka Stream from Bradleys Road to Keetly Place, and the walkway through Ōhoka Bush at the southern end of the domain. Further, the proposal would lead to the creation of additional open and natural spaces.

Subclause (d) - Competitive Operation of Land and Development Markets

367. The proposal supports the competitive operation of land and development markets by avoiding or minimise the impacts of monopolistic competition with respect to residential land. This represents a significant economic benefit.

368. Further, the Applicant has not previously been active in the district, therefore, its entry to the market would increase competition. Because the Applicant is not a house builder, the properties it sells would allow for greater competition in the construction sector.

Subclause (e) - Support Reductions in Greenhouse Gas Emissions

[18] These statistics are sourced from the Commuter Waka website: commuter.waka.app/#

369. Lumen has assessed the GHG emissions of the proposed subdivision/development (**Appendix 38**). It found that the proposal supports a reduction GHG emissions for the following reasons:

- The subdivision promotes walking and cycling and is well positioned to connect with future district cycleways.
- A planned commercial zone would reduce the need for long-distance travel by providing essential services nearby, cutting transport emissions.
- The compact design helps meet housing demand which is preferable to rural lifestyle subdivision which increase emissions due to greater travel distances.
- Reticulated LPG is proposed to be precluded, avoiding associated emissions.
- Shifting from dairy farming to residential use would eliminate significant agricultural emissions, particularly methane and nitrous oxide.

Subclause (f) – Resilience to Climate Change

370. The constraints maps at **Appendix 37** demonstrate that large areas of the district are susceptible to the predicted effects of climate change both now and into the future, particularly relating to exposure to natural hazards such as coastal inundation and flooding. In that context, the proposal achieves resilience to the effects of climate change through the distance of Ōhoka from coastal areas susceptible to sea-level rise and storm surges, and the ability to avoid the potential effects of flooding.

Negative Impacts

371. The potential negative consequences of unplanned urban growth are well known. In the local context, the GCSP identifies the following issues:

- Urban expansion can encroach on and damage sites of significance to Māori. It can also negatively impact air quality, water and usage as well as character and amenity.
- Unplanned growth can strain existing infrastructure.
- Urban expansion can lead to the loss of highly productive soils, which are valuable for food production. It can also impact primary production activities and rural communities.
- Reliance on cars can become ingrained in areas of Greater Christchurch where urban areas develop, and this leads to increased vehicle emissions. Continuing to increase vehicle travel by car increases congestion, which has implications for health, safety, amenity, productivity and the environment.
- Unplanned urban growth can compromise strategic infrastructure, such as the operation of Christchurch Airport.

- Unplanned urban growth can affect people's access to employment, services, green spaces and public transport.

372. While the proposal avoids some of these potential issues, it does negatively impact productive land, transport outcomes, and rural character and amenity. These matters are assessed in the following sections where the consequential adverse effects are determined to be acceptable.

Urban Form Summary and Conclusion

373. The proposal is not anticipated by the planning documents.

374. There is strong demand for residential living at Ōhoka. The site is well located within a desirable and relatively unconstrainted area of the urban environment. It occupies a large contiguous area of land adjacent to an existing urban area that can be developed comprehensively and in a timely manner providing the required development capacity.

375. Accounting for the above assessment and the relevant assessment in the following sections, the adverse effects from an urban form perspective are considered to be more than minor but acceptable.

Loss of Agricultural Production

376. Reeftide Environmental & Projects Ltd has assessed the loss of agricultural production that would result from the proposed subdivision and development (**Appendix 16**) and considers that the proposed development would have less than minor adverse effects in this regard. Further, the economic costs associated with the loss of productive land is assessed by Savvy Consulting (**Appendix 39**) which find that the effects are less than minor.

377. The proposed urbanisation of the site would result in the permanent loss of productive farmland. The soil classification of the site is predominantly Land Use Capability (**LUC**) 3 with a small (approximately 2.8 hectares) area of LUC 2 in the northern portion.

378. The RPS recognises LUC 1 and 2 class soils as versatile and that these soils support the widest range of productive uses with the least inputs. The NPS-HPL requires regional councils to map LUC 1, 2 and 3 soils as highly productive land. In this instance, the Regional Council has mapped, but not notified, highly productive land and an interim definition applies as per clause 3.5(7) of the NPS-HPL. As per that definition, the site land is not classified as highly productive land because it is not zoned general rural or rural production.

379. Despite the above, the current primary productive use of the site appears to be viable operation. The land has supported a dairy farming business for many years. However, the relevant baseline for assessing the loss of productive rural land, is the highest and best use of the site under district plan provisions. In accordance with the OWDP and POWDP, the land could be subdivided as a controlled activity into four-hectare allotments. Indeed, should the proposal be refused, subdivision for rural lifestyle use is the Applicant's alterative development option. The high demand for lifestyle properties in the area has elevated the value of the site to a level where rural lifestyle represents the highest and best use. This is further exacerbated by the application of the NPS-HPL in respect of rurally zoned land beyond the Rural Lifestyle Zone. The NPS-HPL significantly restricts further subdivision of

rural land meaning that demand for rural lifestyle properties will be met almost exclusively within the Rural Lifestyle Zone.

380. Rural lifestyle subdivision of the site would significantly reduce the current productive value of the site. The 2018 Waimakariri District Rural Character Assessment states that activity on four-hectare rural lifestyle blocks "*is typically focused on rural residential use with the balance land simply maintained as ancillary or used for small scale primary production*"[19]. Further, a relevant excerpt from a 2018 MacFarlane Rural Business assessment referenced in a District Council officer memo to the Proposed Plan Hearings Panel says:

> *there are very few agricultural or horticultural farming practises that would justify a farming business of 4ha (with the exception of very intensive vegetable production or glasshouse operations), even if they are operated to the highest level. The reality is that most properties under 10ha have been purchased for lifestyle purposes and the majority of the household income is derived off farm. Furthermore, once the house and amenities are deducted from the total area, the effective farming area on a 4ha property could be as low as 2ha. Whilst in theory a group of 4ha properties could be operated in conjunction to achieve scale, this is unlikely to be successful given owners will often have differing priorities and the fact that the small paddock sizes will limit operational efficiency.*

381. In addition to reducing its rural productive value, subdivision of the land into four-hectare lots would also represent a lost opportunity to deliver significant residential development capacity via a comprehensively designed expansion of the existing Ōhoka settlement. Further, the assessment included at **Appendix 2** demonstrates that the economic benefits of the proposal far outweigh the costs relating to the loss of primary production.

382. The above assessment demonstrates that the benefits of the proposed urbanisation of the site outweigh the costs relating to the loss of productive land. Importantly, the primary productive value of the site would be diminished even if the proposal was refused given the highest and best use of the land anticipated by the OWDP and POWDP is for rural lifestyle purposes. On this basis, the adverse effects resulting from the loss of productive land is considered to be no more than minor.

Transport

Internal Road Layout and Site Access

383. The Novo Group integrated transport assessment (see **Appendix 15**) considers the proposed internal road layout including the proposed intersections with Bradleys, Mill and Whites roads. The assessment finds that the proposed arrangements are acceptable subject to detailed design. Accounting for this, any adverse effects are considered to be no more than minor.

Impacts on the Wider Network

384. The transport assessment estimates the volume of traffic likely to be generated by the proposal and its distribution across the local and wider road network, in combination with background traffic growth not attributable to the development. Based on these

[19] The 2018 Boffa Miskell Waimakariri District – Rural Character Assessment, page 2.

assumptions, the assessment identifies a range of transport infrastructure upgrades to accommodate future demand. These include:

- speed limit changes and threshold treatments on Whites Road and Bradleys Road;
- shared paths along the Whites Road, Bradleys Road and Mill Road frontages;
- shared path upgrades on Mill Road between Whites Road and Ōhoka School;
- pedestrian crossing improvements to and from Ōhoka Domain;
- minor safety improvements on Bradleys Road, Whites Road, Mill Road and Threlkelds Road;
- a new roundabout at the Tram Road / Bradleys Road / McHughs Road intersection;
- safety improvements at the Tram Road / Whites Road intersection;
- a roundabout at the Flaxton Road / Threlkelds Road / Skewbridge Road intersection; and
- priority changes at the Mill Road / Threlkelds Road intersection.

385. Of these measures, the shared paths along the Whites Road and Bradleys Road frontages form part of the proposed subdivision and are located within the application site. These works can therefore be delivered by the Applicant. The remaining upgrades are located within the legal road reserve and would require implementation by the District Council or, where relevant, approval from it as the road controlling authority. The Tram Road / Bradleys Road / McHughs Road roundabout is already identified as a planned and funded project in the District Council's LTP.

386. Of the recommended transport upgrades, the Flaxton Road / Threlkelds Road / Skewbridge Road intersection upgrade is the only measure necessary to mitigate significant adverse effects. The Novo Group transport assessment concludes that, based on existing traffic volumes within the Flaxton Road / Skewbridge Road corridor, the Flaxton Road / Threlkelds Road / Skewbridge Road intersection can accommodate traffic generated by up to 310 residential allotments and 150 retirement units before an upgrade is required. This level of development corresponds to residential stages 1, 2 and 4, together with approximately 60% of the retirement village (Stage 3).

387. The assessment identifies a roundabout as the most appropriate upgrade option, with an indicative layout provided in **Figure 7**. In the absence of this upgrade, development a proposed condition of consent would pause development at Stage 6 of the subdivision to avoid unacceptable traffic safety risks. Stage 6 follows residential Stage 4, noting that Stage 5 comprises the polo complex.

388. The Flaxton Road / Threlkelds Road / Skewbridge Road intersection upgrade is not currently planned or funded and does not feature in the District Council's current LTP. Given there would be ample time for planning and construction of the upgrade, it is unlikely that the development would be delayed beyond Stage 4. It is anticipated it would be funded by way of development contributions provided the project is included in the LTP. Another

viable option would be to fund development by way of an agreement between the developer and the District Council.

389. The transport assessment also considers effects on the State Highway 1 / Tram Road interchange, drawing on modelling undertaken during the Proposed Plan process. This modelling indicates that, even with full development of the site, interchange performance would remain tolerable during peak periods with alterations to signal phasing. The New Zealand Transport Agency has previously advised that it takes a responsive approach to traffic growth on the state highway network, implementing improvements as required. The staging and timing of the proposed subdivision would provide sufficient opportunity for capacity improvements to be implemented at the interchange if considered necessary.

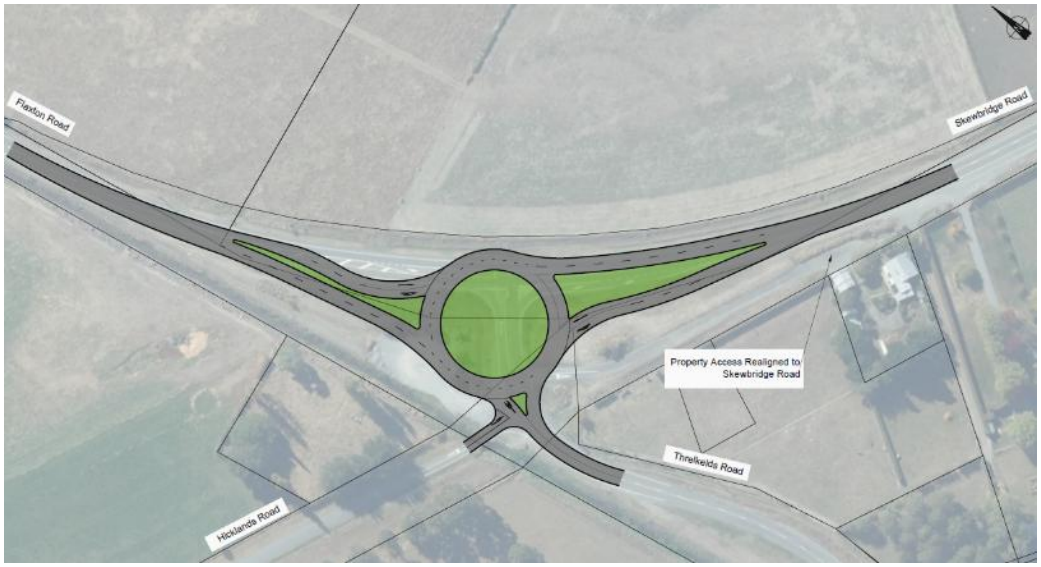

Figure 7: Recommended intersection upgrade

390. Overall, the transport assessment concludes that, provided the Flaxton Road / Threlkelds Road / Skewbridge Road intersection upgrade is implemented, the existing road network can safely accommodate the proposed development. None of the other identified upgrades are considered necessary to avoid potentially significant adverse effects.

Connectivity and Accessibility

391. The site is well connected within the Greater Christchurch sub-region along existing transport corridors. Further, connectivity would be improved with the implementation of the road infrastructure upgrades listed in the integrated transport assessment (**Appendix 15**) and the planned off-road cycle/pedestrian network.

392. The assessment at paragraphs 358 to 366 demonstrates that the proposal provides an acceptable level of accessibility for people between where they live and place of work, community services and recreational opportunities. Given the distance of the site from Christchurch and the main centres of the district, accessibility via public transport and active modes is suboptimal. Currently, the site is connected to these centres via rural roads with no or limited pedestrian or cycle facilities. The planned cycle/pedestrian network connecting Ōhoka to Rangiora and Kaiapoi will improve the situation in the future, noting

that the network is not currently funded. However, it is likely that approval of the proposal would increase its viability and bring forward implementation with funding assistance by way of development contributions. The transport assessment also identifies a suitable cycle route to Kaiapoi via Main Drain Road subject to the Skewbridge Road bridge replacement (which has a funding allocation in the LTP).

393. The proposed cycle network will provide a valuable resource for recreational cycling. While it would unlikely benefit the commuting workforce, it is relevant to note that Ōhoka is closer to Christchurch compared to Rangiora and Woodend/Ravenswood/Pegasus which are also beyond a reasonable cycling distance of the main employment centre of Greater Christchurch.

394. Overall, the proposal is considered to be well connected within the constellation of urban centres within Greater Christchurch and provides acceptable accessibility, while acknowledging travel by public transport and active modes would be lower compared to locations within the larger urban centres. However, there are few feasible or practicable alternative locations where development capacity can be provided closer to the district's main towns – keeping in mind that the proposal provides for demand for housing outside the main towns. Further, there is scope to provide public transport services to Ōhoka in the future, possibly via an on-demand type model like that which operates in Timaru.

Vehicle Kilometres Travelled

395. Given that travel by public transport and active modes is unlikely to be a viable option for many future residents for many trip types, the proposal would likely result in a pronounced increase in vehicle kilometres travelled (**VKT**) relating to trips to and from Ōhoka. Increasing VKT is generally associated increased GHG emissions, traffic congestion and safety risks. In this instance, the traffic assessment has found that the efficiency and safety of the existing road network can be maintained provided recommended certain upgrades are implemented. However, it is expected that the proposal would result in an increase in transport related GHG emissions. The NPS-UD is concerned that urban environments *support* reductions in emissions. The NPS-UD deliberately does not require reductions in absolute terms because this allows for a proportion of future growth to be accommodated by greenfield development. Such development is anticipated by the NPS-UD and by its nature increases VKT and associated transport related GHG emissions. The proposal supports reductions in GHG emissions in several ways as outlined in the proposal section at paragraph 116.

396. Given that some increase in transport related GHG emissions is anticipated in conjunction with greenfield development, context is important when assessing adverse effects. In this instance, the context of the district is relevant, particularly its relationship with Christchurch (which is the principal centre within the 'Christchurch' urban environment). The extent and pace of urban growth in the district (particularly in the east) is largely attributed to its proximity to Christchurch. 2018 Census data indicates that "36% of all renter households and 45% of all owner occupiers living in Waimakariri District work in Christchurch City"[20]. And one would assume that the proportion of people who work in Christchurch would increase with proximity to the city. The high percentage of people that commute to

[20] Paragraph 2 of the Director of Livingstone and Associates Ltd 'Population and Housing Demographics – Rangiora, April 2021' report by Ian Mitchell which also notes that the district has the highest rate of owner occupation in the country at 80.4%.

Christchurch is one indicator of the district's dependency on the city. In this context, the proposal can be seen as providing 'more of the same' within the eastern part of the district – in other words, to some extent, it provides housing for the Christchurch workforce. However, the key difference in respect of this proposal is that it seeks to provide residential development capacity to satisfy demand outside the main urban centres of the district.

397. In responding to expected demand in the western part of the urban environment, the proposal would deliver the required development capacity in a less carbon intensive manner compared to a more dispersed rural residential approach. It does this by creating a walkable/cyclable township focused around a significantly improved local offering of goods and services. While the offering would be more limited than that found in the main centres of the district, it is anticipated to have a VKT reducing impact.

398. Within Greater Christchurch, West Melton in the Selwyn District provides a relevant comparator for the proposal.

- West Melton, like Ōhoka, is within the 'Christchurch' urban environment.

- West Melton, like Ōhoka, is a long-established settlement that has historically been a small urban area, relative to larger urban centres within the district. The current extent of West Melton is considerably different in scale and character compared to what existed prior to the 2010/11 Canterbury earthquakes[21], and further growth has recently been enabled through district plan change and review processes.

- Recent planning decisions found West Melton to have locality and market specific demands for housing that could not be resolved by increasing housing supply in the larger centres of the district, and which therefore necessitated additional supply in West Melton in accordance with the NPS-UD[22]. Notably, the Proposed Selwyn District Plan decision on rezoning requests for West Melton found that the urban rezoning of highly productive land at West Melton was appropriate and would satisfy clause 3.6(1)(b) of the NPS-HPL, given that there were no other reasonably practicable feasible options for providing housing capacity within the same locality and market. This indicates that demand in this locality and market could not be satisfied by supply in the district's other main urban centres such as Rolleston or Darfield[23].

399. The comparison with West Melton is relevant to the VKT/GHG emissions assessment because West Melton, like Ōhoka, has (relative to larger centres) a comparatively high level of VKT due it also having suboptimal public transport and active travel accessibility coupled with limited employment opportunities and limited community/commercial facilities. The proposal would transform Ōhoka into a place that would perform much the same function as West Melton does in the Selwyn District. Both have relatively small but

[21] West Melton was first settled in the 1860's, had a population of approximately 330 residents in 2007, and as of 2023 has approximately 3000 residents (Source: www.selwynconnect.co.nz/exploreselwyn/west-melton)
[22] See paragraphs 211-245, 384-386 and 391 of the Selwyn District Council's decision on Plan Change 67, being a request to rezone approximately 33.4 hectares of land from Rural Inner Plains to Living West Melton South in West Melton.
[23] See paragraphs 53-58 of the Selwyn District Council's decision on Proposed Selwyn District Plan Hearing 30.6: Rezoning Requests – West Melton. www.selwyn.govt.nz/__data/assets/pdf_file/0020/2060453/PDP-Hearing-30.6-Rezoning-West-Melton.pdf

established urban areas, and location and market specific demands for housing capacity that cannot be substituted by other urban areas or main centres in the district. Therefore, Ōhoka requires (and West Melton required) sufficient development capacity to be provided in accordance with the NPS-UD (as discussed later in the application).

Transport Conclusion

400. Accounting for the transport assessment at **Appendix 15**, it is considered that the adverse transport effects of the proposal are more than minor but acceptable.

Character and Amenity

401. Amenity values are defined in the RMA as:

> *those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes.*

402. To assess the effects of the proposal on the existing character and amenity values of the settlement, it is necessary to understand the local context. In this instance, the core of the settlement is confined within the north and south tributaries of the Ōhoka Stream. Beyond the core, residential development is hidden behind mature vegetation. The Residential 3 / Settlement Zone is entirely contained within the core and covers approximately 14 hectares (minus the domain). The zone is identified as an urban environment in the RPS, and consistent with many of the attributes of the Residential 3 Zone as listed in the OWDP, it features:

- predominantly residential activity with detached dwellings of diverse styles and ages on a wide range of generous lot sizes,
- access to public open spaces and a local shop,
- informal streetscapes, with limited footpaths and minimal kerb and channel, that are a focus for community interaction (alongside the domain), and
- a rural outlook and setting with low noise levels and low traffic volumes.

403. The zone is currently developed to a very low density (with lot sizes ranging from 1,000m^2 to 7,500m^2), but the OWDP and POWDP minimum allotment size is 600m^2. If the land was redeveloped to achieve a density closer to the minimum lot size, it would yield approximately 230 households (about 200 more than are currently within the zone). However, while the density would change, this would have little impact on the characteristics of the settlement. This is because the key elements that contribute to the character of Ōhoka are the landscape setting and rural streetscapes, not the density or built form. The DCM landscape assessment (**Appendix 23**) considers that the characteristics of Ōhoka would be retained and enhanced by the proposal due to its careful and considered design. The assessment considers that the existing characteristics are reflected in the:

- spatial layout of the proposal,
- design of streets and public spaces,

- edge treatment of the perimeter roads,
- placement of the commercial centre,
- landscape treatment of the waterway margins, and
- the location and design of the settlement gateways / thresholds.

404. The proposal seeks to emulate the existing form of the settlement by including the proposed commercial aspects within the core and screening most of the residential development from view.

405. The landscape change that would result from the proposal and its impact on visual amenity have been assessed by DCM as acceptable in the context of the existing and anticipated environment (which includes potential rural lifestyle subdivision of the site). The landscape assessment considers that the proposal would change the currently experienced visual amenity from public and private vantage points, but that this does necessarily translate to a lower level of visual amenity. The assessment also identifies positive landscape and visual amenity effects of the proposal including improvement in ecological values and an increase in general amenity from a high-quality landscape setting. Further, the assessment considers that an expanded Ōhoka would appear visually separate from rural residential and lifestyle development that radiates out from the local centre at Mandeville.

406. While the landscape character and visual amenity effects of the proposal can be successfully mitigated by planting treatments, other character and amenity related effects cannot be mitigated. These relate to the increased local population that the proposal would provide for. The settlement would become a substantially busier place with more people about and more traffic. For the existing residents who value the quietness of the place and the small local population, such a change would be unwelcome, while others may not perceive it as a negative.

407. The character of the site would clearly change with the introduction of dwellings at urban and peri-urban densities, roads, a local commercial centre, and a retirement village. While the proposal would bring change, it would maintain the key characteristics of the Ōhoka settlement and is acceptable in terms of landscape change and visual amenity effects. Adverse effects relating to increased ‘activity’ cannot be mitigated and are anticipated to be more than minor, accepting that some may view this positively.

408. With reference to the RMA definition of amenity values, it is considered that Ōhoka would remain a pleasant and aesthetically coherent settlement, with its cultural attributes retained and its recreational attributes enhanced. The settlement would continue to exist as a village, albeit of a larger size, within a rural landscape. Further, it is considered that the change would increase those amenity values associated with markedly improved local convenience, improved ecology and amenity of waterways, and additional recreational opportunities by way of new public open spaces.

Urban Design

409. The urban design aspects of the proposal have been assessed by DCM as aligning well with all aspects of best practice against the principles of the New Zealand Urban Design Protocol. DCM find that the development masterplan:

> *is well-considered incorporating best practice urban design principles to ensure a highly functional, connected, aesthetically pleasing and well-integrated development.*

410. Relying on the DCM assessment, it is considered that the proposal would provide a high standard of urban design, and any adverse effects are no more than minor.

Geotechnical

411. A geotechnical assessment undertaken by Tetra Tech Coffey (**Appendix 18**) concludes that the site is "TC1-like". Based on the assessment, no geotechnical limitations are anticipated to impact the proposed subdivision and development.

Land Contamination

412. A Preliminary Site Investigation undertaken by Tetra Tech Coffey to support the Applicant's initial plan change request found the presence of HAIL activities on the site. Urban development of the site was considered low risk due to the relatively small scale and low risk of the potentially contaminating activities identified. Residual risk was recommended to be addressed via a detailed site investigation (**DSI**) followed by remediation (if required) prior to development.

413. The DSI and supplementary DSI identify that the site has a history of rural and farming activities, including the presence of buildings, burn areas, and localised fill, resulting in its classification as potentially contaminated land under the NES Soil. Investigations undertaken across the site confirm that, while the majority of soils are uncontaminated and suitable for residential use, there are several localised areas where contaminant concentrations exceed relevant guideline values. These exceedances are limited in extent and are primarily associated with heavy metals such as arsenic, cadmium, and lead in discrete locations linked to historic farming activities. A single asbestos detection was identified near a historic dwelling, although this was not replicated through subsequent supplementary sampling. No evidence of widespread contamination, landfill, or significant groundwater or surface water contamination has been identified, and the supplementary investigations confirm that risks to ecological receptors and off-site environments are low, provided standard management practices are implemented.

414. The contamination identified is localised, well-defined, and typical of rural sites, and does not present a material constraint to the proposed urban development. The potential adverse effects on human health and the environment can be effectively avoided through established best practice measures, including the preparation and implementation of a remediation action plan, targeted excavation or containment of contaminated soils, and validation sampling supported by a site validation report to confirm the suitability of the land for its intended uses. Standard erosion, sediment, and stormwater controls during earthworks would further ensure that any risk of contaminant mobilisation is appropriately managed. On this basis, the site can be made suitable for residential, commercial, and

recreational development, with residual effects on human health, groundwater, surface water, and ecological values expected to be less than minor.

415. It is the Applicant's intention that contamination levels would be below the relevant soil contaminant standards prior to the issue of section 224 certificates for each stage of subdivision.

Natural Hazards

416. The only natural hazards identified as affecting the site are flooding and liquefaction.

Liquefaction

417. According to the 2012 Eastern Canterbury Liquefaction Susceptibility Study, the site is within the area where the risk of damage from liquefaction is unlikely. Further, as per the Tetra Tech Coffey geotechnical report, the land is assessed as "TC1-like". On this basis, any potential risk in respect of liquefaction is considered to be low and manageable.

Flooding

418. PDP conducted a flood effects assessment for a proposed development (**Appendix 22**), using a calibrated 2D hydraulic model. The study evaluated flood risks under 50, 200, and 500-year events, including an allowance for climate change impacts. Results show the site has low existing flood hazard and the development can manage internal flooding effectively through elevated floor levels and drainage design. External impacts are minimal, with negligible changes to surrounding properties, infrastructure, and heritage sites. The development is assessed as capable of safely managing flood risks.

419. The PDP assessment demonstrates that the proposal avoids significant flood hazards and ensures that the proposed subdivision and development does not unduly increase the flood risk within Ōhoka and adjoining areas. No existing habitable buildings beyond the site would be subject to an increase in average flood levels greater than 20mm as a result of the proposal.

Infrastructure

420. The site is located beyond the Projected Infrastructure Boundary indicated on Map A of the RPS which wraps around the existing Settlement zoned land in Ōhoka. Despite this, the infrastructure assessment prepared for the proposal by Inovo (**Appendix 14**) demonstrates that the proposed development can be satisfactorily serviced through a combination of existing, upgraded and new infrastructure. The following assessment considers that effects of the proposal on the National Grid that traverses the site and the effects of the proposed three waters infrastructure.

The National Grid

421. The Applicant has consulted with Transpower to determine the safeguards required to avoid adversely impacting the National Grid. Transpower recommended a suite of conditions (**Appendix 8**) which are accepted by the Applicant and reflected in the proposed conditions contained in **Appendix 43**.

422. We note Transpower's comment about the suitability of Lot 795 (now Lot 870) to accommodate a future dwelling given its shape and the area covered by the National Grid Yard. Amendments have been made to ensure there is sufficient space within the proposed allotment to accommodate a dwelling.

Operational Stormwater Discharge

Stormwater Management Overview

423. The ability to manage stormwater within the site has been assessed by PDP (**Appendix 31**). The stormwater management report outlines the proposed approach to stormwater treatment and flood attenuation for the development.

424. Due to high groundwater levels on the site and the need to manage stormwater from events up to the 2% AEP (50-year event), attenuation is provided through a combination of stormwater storage systems. These include storage within first flush basins, above permanent water levels in treatment wetlands, and within attenuation basins or wet ponds.

Attenuation and Treatment Systems

425. In catchments where first flush basins and treatment wetlands are used, stormwater attenuation occurs in stages. The first flush volume is discharged over four days to meet water quality requirements. Secondary flows, contained within the wetland volume, are discharged over a shorter time period.

426. In other catchments, stormwater treatment is provided via swales before being attenuated in wet ponds. Additional treatment features include rain gardens (such as the SW360 Filterra® system) and proprietary treatment devices for higher-risk contaminant areas.

427. Stormwater events exceeding the 2% AEP, including allowances for climate change, would overflow from the wetlands or ponds via spillways. These overflows would be discharged in a controlled manner to the downstream environment.

428. Stormwater from the polo field would be managed using subsoil drainage and attenuated via an outlet structure (scruffy dome) at the top of the field. The future retirement village would require its own stormwater treatment and attenuation measures to be developed in accordance with overall site strategy.

429. Stormwater discharges from the site would be directed to multiple receiving environments, including Ōhoka Stream South Branch, Ōhoka Stream, a spring channel, and drains within Mill Road and Whites Road.

Discharge Management and Hydraulic Performance

430. The stormwater strategy is designed to ensure post-development runoff does not exceed pre-development flows at each downstream discharge point through the retention and attenuation of stormwater within wetlands and SMA's as outlined in the PDP assessment (**Appendix 31**).

431. This approach is expected to mitigate adverse hydraulic effects on receiving water bodies, including overland flow and flooding. Secondary flow paths have been accounted for, and onsite flooding is managed within the design.

432. The effects of post-development discharges on downstream flows and flooding are therefore considered to be appropriately mitigated and less than minor.

Water Quality and Contaminants

433. Contaminants typically associated with urban stormwater include suspended sediments, hydrocarbons and oils from vehicle use, and trace levels of heavy metals such as zinc, copper, and lead.

434. Applicable water quality standards are those outlined in Schedule 5 of the LWRP, including Table S5A (Receiving Water Standards) and Table S5B (Level of Protection). These standards apply downstream of the mixing zone, typically within the receiving rivers or waterways. Additional criteria are derived from the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018 (**ANZG**) guidelines, which aim to protect 95% of freshwater species.

435. For spring-fed waterways, a TSS limit of 50 mg/L applies under the LWRP. The TSS level in stormwater is expected to comply with the LWRP limit of 50 mg/L for all stormwater treatment methods.

436. Expected concentrations of hydrocarbons in the runoff are low, with most captured by roadside sumps.

437. While zinc and copper may not meet species protection limits at the point of discharge, dilution within receiving waters is anticipated. Discharges from proprietary devices, swales, and rain gardens may occur before stream flows rise, reducing the dilution effect. However, this is expected to be temporary.

438. The aquatic ecology assessment and the addendum (**Appendix 19**) provide an assessment of the expected discharge quality and consider that the temporary exceedance is not expected to cause significant adverse effects. This conclusion is based on a comparison of the exceedances with Interim Tier 1 acute Guideline Values (**GVs**) for zinc and copper, which are applicable for short term exposure. Under these acute GVs, zinc concentrations for all stormwater treatment types remain within the 95% level of species protection prior to mixing, and copper is below the acute GVs for swales and detention basins, providing confidence that the receiving environment will be protected from acute toxicological effects.

439. Nevertheless, monitoring is proposed to evaluate and ensure that cumulative effects in downstream environments are managed. Quarterly surface water quality monitoring would ensure that stormwater treatment is meeting its treatment efficiencies and contaminant threshold limits (as set out in the draft conditions – **Appendix 44**).

440. The shift in land use from dairy farming to residential will reduce nitrogen loads discharged to nearby spring-fed rivers, which aligns with LWRP goals.

441. Similarly, E. coli levels are expected to decline as the source of contamination shifts away from livestock. This is anticipated to have a positive impact on water quality in terms of meeting the NZ Drinking Water Standards.

442. The nearest Community Drinking Water Protection Zone lies upstream and to the northwest of the site. Given the design of the system and expected low metal concentrations, stormwater discharges are not expected to pose a risk to groundwater users.

Treatment Devices and Expected Performance

443. The proposed treatment devices include:

- First flush basins and treatment wetlands, where captured runoff is discharged to a wetland system for further treatment.
- Swales, to provide initial treatment for first flush flows.
- Raingardens, using engineered media to treat flows up to 4,450 mm/hr (e.g. Filterra® systems).
- Proprietary devices, targeting gross pollutants, suspended solids, hydrocarbons, and metals
- Gross pollutants would be intercepted using sumps with submerged outlets or devices like LittaTrap™ or TetraTrap®.
- Water quality flows from higher-risk areas would be treated using proprietary filter systems (e.g. SW360 Stormfilter®).

444. According to the water quality memo (**Appendix 31**), the system is designed to remove the majority of suspended solids, hydrocarbons, and heavy metals before discharge. All first flush flows will pass through attenuation basins or wetlands, which further enhance removal of these contaminants. Overall, the expected discharge quality indicates that the proposed stormwater treatment systems would effectively manage sediment, nutrients, and contaminants.

Cultural Considerations

445. The receiving spring-fed waterways may be used for customary gathering of mahinga kai, making protection of water quality a cultural priority. The stormwater treatment system has been designed to meet, where possible, the 95% level of protection criteria under Schedule 5 – Table S5B of the LWRP, and to minimise contaminants prior to discharge.

446. Post-development water quality would be monitored initially at quarterly r intervals for each discharge point to surface water. This monitoring will assess compliance with relevant standards and evaluate potential effects on ecological values, mahinga kai, and the cultural health of the receiving environment.

447. With the above measures in place, the proposal is expected to mitigate adverse effects on ecological values. However, in the context of iwi management plan objectives for the restoration and enhancement of mahinga kai and freshwater values in the Waimakariri

catchment, some residual effects on cultural values are likely to remain, and a degree of tension persists in achieving those outcomes.

Operation, Maintenance, and Council Requirements

448. The long-term operation and maintenance of the stormwater system is to be managed in accordance with the proposed draft conditions (**Appendix 44**). All stormwater infrastructure is to be maintained in accordance with District Council requirements and would ultimately be vested in the District Council.

449. This ongoing management would ensure continued effectiveness of the treatment system and protection of groundwater and surface water resources.

Operational Stormwater Discharge Summary

450. Overall, the expected discharge quality indicates that the proposed stormwater treatment system will effectively manage sediment, hydrocarbons, nutrients and a significant proportion of metals prior to discharge. While intermittent exceedances of copper and zinc may occur at the point of discharge, these are expected to be short-term, associated with first flush events, and reduced through dilution and mixing within the receiving environment.

451. When assessed in the context of acute toxicity thresholds, the proposed treatment train, and the implementation of monitoring and adaptive management measures, the discharge is not expected to result in significant adverse ecological effects. In addition, the conversion from dairy farming to residential land use will reduce nitrogen and E. coli loads to receiving waters, providing an overall improvement in water quality.

452. Quarterly water quality monitoring is proposed for the initial post-development period at each stormwater discharge point to surface water, to confirm treatment performance and identify any emerging effects. Ongoing monitoring, maintenance and management of the stormwater treatment system will also be required. These requirements are secured through the proposed draft consent conditions, which provide a management framework to ensure that contaminant loads and potential emerging adverse effects are appropriately managed over time.

453. On this basis, potential adverse effects on water quality and aquatic ecology are assessed as no more than minor.

Community Water Supply

454. A new community drinking water supply is proposed to service the majority of the development, with the first stage residential lots and commercial area able to be serviced by the existing supply. The new community drinking water supply will require an estimated four new bores capable of supplying a daily volume of 3,686.4m^3. It is noted that the site is not affected by a Water Conservation Order and is not located within an identified Critical Habitat area.

455. The water supply will require the installation of bores which are generally a permitted activity so long as standard requirements are met. In this instance, as the site is currently identified as containing contamination, the bores require consent for drilling. However, the bores will not be drilled until site remediation has occurred in accordance with a Remedial

Action Plan. The bores will be drilled by an accredited company under the Regional Council Bore Installers Programme.

Demand for Water

456. A new supply would have potential effects relating to the demand for water. The demand for water has been calculated as 403,332m^3 being the annual volume requirement for community supply (see the PDP groundwater assessment at **Appendix 17**). This is based on 752 standard (smaller) lots, and 123 large lots, the future retirement village, and the local centre. Additionally, 57,888m^3 annual volume is required for irrigation of the sports field and irrigation of the SMAs. Based on the PDP calculations, four bores can supply the necessary daily volume. However, there is some uncertainty regarding the yield obtained from individual new bores so it is possible that additional bores may be required. It is considered that the demand for water would be able to be managed appropriately with further testing of yield at detailed design stage.

457. A new reticulated network is proposed to service all lots within the development. It is considered that the network will provide efficient water supply from the new community supply bores, or for Stage 1 and the commercial development from the existing community supply.

Water Supply Strategy

458. A water supply strategy has been prepared by Inovo (see **Appendix 29**) in accordance with Schedule 25 of the LWRP. The strategy sets out the proposed community supply system, the anticipated demand and future demand, firefighting supply, irrigation for sports fields and the SMA's, a water conservation strategy and drought management. The strategy is intended to align with the Waimakariri Water Supply Bylaw 2018 and the Canterbury Water Management Strategy as the water supply will ultimately be the responsibility of the Municipal Water Supply Authority (in this case, the District Council).

Surrounding Water Takes

459. The groundwater assessment (**Appendix 17**) discusses the actual and potential adverse effects on surrounding water takes and the reliability of supply, noting that the shift from shallow irrigation bores (to be decommissioned) to deep supply bores would alter the drawdown effects. The drawdown from the deep supply bores would increase existing drawdown interference in other deep bores. However, there are very few existing deep bores in the area, and they are generally less sensitive to drawdown interference effects compared to shallow bores. PDP prepared an assessment (**Appendix 17**) in accordance with Schedule 12 of the LWRP to assess effects on existing groundwater users. The results can be summarised as:

- 80% of the available drawdown is protected for individual bores (meaning yield requirements can be maintained) in respect of deep bores greater than 30 metres deep. The drawdown interference effects do not exceed the 20% (of available drawdown) Schedule 12 threshold.

- In relation to the shallower bores (less than 30m deep), the threshold for interference is exceeded. But this includes interference from the operation of the existing shallow irrigation bores on site (along with the proposed water supply),

whereas the irrigation bores would be decommissioned once the site is developed which would significantly reduce drawdown interference.

- The assessment for drawdown interference was based on the water being drawn from a single abstraction bore, whereas this would be spread across multiple bores. It is assumed that localised effects would be reduced by spreading the volume of water taken over multiple bores.

- The outcome of the assessment against the Schedule 12 'well interference effects' is that there is no indication that existing neighbouring bores would be adversely affected, with effects considered to be less than minor.

Environmental Flow and Allocation Limits

460. The site is within the Eyre Groundwater Allocation Zone as defined by ECan. Presently the site groundwater is not over allocated but is close to that threshold. The existing irrigation consents for the site would be surrendered (via a staged approach) as the site is developed. This would result in a net reduction in allocation in the zone when comparing the proposed water supply take with the existing irrigation take.

461. It is noted that abstraction for community water supply is supported by LWRP policy 4.50 which provides for abstraction to meet community water supply requirements regardless of whether the groundwater allocation limit is exceeded.

462. PDP has undertaken a stream depletion assessment to gauge effects on the surface waterways and springs and that pass through the site. Given that the new bores for the water supply are proposed to be deep, and considering the lower permeability of soils, it is unlikely that there would be a significant degree of hydraulic connectivity with surface water. The assessment concludes that there would be a moderate degree of stream depletion effects. However, it is noted that the decommissioning of the shallower irrigation abstraction would provide for a reduction in stream depletion given that these abstraction points can be expected to have a much greater hydraulic connection. Therefore, the net effect of the cessation of irrigation abstraction and new community water supply is a reduction in stream depletion effects.

463. For groundwater takes with a moderate degree of hydraulic connection, no flow restrictions are typically applied, as the lag time between groundwater abstraction and any resulting stream depletion is sufficiently delayed minimising immediate effects on surface water flows.

Potential Benefits

464. A community water supply is part of providing for a well-functioning urban environment, and therefore the supply contributes to significant economic and community benefits that would occur as part of expanding the Ōhoka settlement.

465. The water supply itself would ensure that the community is provided with sufficient water supply, contributing to community resilience. The effect of redeveloping the site from farming to residential would result in a net positive outcome for water abstraction as the shallow irrigation bores would be decommissioned and new deeper water supply bores are drawn. The change in abstraction depth and the proposed water take would provide for a

reduction in the interference with shallow bores and surface water providing a positive environmental outcome. This is also considered to be positive in relation to reducing adverse cultural effects, as the water take will not interfere significantly with the spring-fed waterways on site.

Community Drinking Water Protection Zones

466. The LWRP contains a methodology for determining Community Drinking Water Protection Zones. PDP recommends a circular zone extending from the bore for 100 metres in all directions (Schedule 1). PDP confirms that these zones should be established around all new water supply bores, noting also that these new bores should be located 100 metres from site boundaries to ensure encroachment does not occur on neighbouring properties (**Appendix 17**). The effects on neighbouring landowners of establishing these zones is considered to be less than minor.

Community Drinking Water Summary

467. Overall, the effects associated with the establishment and continued use of a community water supply is considered to be less than minor.

Wastewater

468. PDP evaluated wastewater servicing options for the proposed development at (**Appendix 28**). The development is proposed to connect to the existing Mandeville-Ōhoka wastewater system via a new pump station. The current system, connecting to the Bradleys Road Pump Station, has ample capacity under normal conditions but faces constraints during rare severe inflow and infiltration events, which can increase flows substantially. To mitigate this, the proposed pump station would include sufficient buffer storage and coordinate operations with Bradleys Road Pump Station to avoid conflicts. Additional resilience is provided by significant additional distributed household storage via low pressure sewer systems.

469. PDP's hydraulic modelling confirms compliance with District Council standards, ensuring reliable performance under both normal and emergency conditions. Further, future drainage improvements by the District Council would reduce the impact of the rare inflow and infiltration events.

470. Accounting for the PDP assessment, the adverse effects of the wastewater proposal are considered to be less than minor.

Infrastructure Effects Conclusion

471. Accounting for the relevant assessments by Inovo, PDP and Novo Group, the adverse effects of the proposed infrastructure are considered to be no more than minor.

Aquatic Ecology

Surface Waterbodies

472. The streams identified as having high ecological value – including the Ōhoka Tributary and the South Ōhoka Stream – are proposed to be retained and enhanced largely along their

existing alignments. Exceptions include the proposed realignment of approximately 400 metres of the South Ōhoka Stream, the merging of the Northern and Southern spring channels, and the realignment of the Groundwater Seep channel. These changes would be necessary to accommodate the development layout while integrating ecological improvements.

473. Where realignment is proposed for these streams with high ecological value, the new channel design would maintain, at a minimum, the existing flow capacity and match upstream and downstream water surface elevations. This would be achieved through detailed design that ensures the realigned reaches replicate the wetted width and hydraulic performance of the existing channels. These principles would also guide the realignment of the Northern Spring channel and the Groundwater Seep channel.

474. To minimise and mitigate potential adverse effects on aquatic values, the design has been informed by an ecological assessment prepared by Instream Consulting (**Appendix 19**). Their input has shaped a suite of enhancement measures aimed at achieving long-term ecological uplift through habitat improvement, hydrological consolidation, and riparian corridor restoration.

475. Three unnamed drains are proposed to be infilled. These channels, historically excavated for agricultural drainage, are classified as modified natural watercourses due to their connection with shallow groundwater and historical wetland areas, and therefore are considered under the LWRP definition to be 'rivers'. However, they currently provide minimal ecological function. Site investigations by Instream Consulting confirmed that these drains exhibit either no flow, standing water, or very low intermittent flows. In contrast, the spring-fed watercourses proposed for realignment and enhancement support more stable baseflows and higher-quality aquatic habitats.

476. The realignment of these spring-fed streams would consolidate baseflows and enhance ecological connectivity between key hydrological features, specifically the Northern Spring-head, Central Spring-head, and Southern Ōhoka branch. Concentrating flows into fewer, ecologically optimised channels would improve instream conditions and hydraulic variability. Instream Consulting has identified that incorporating instream features such as meanders, pools, and varied substrates would increase hydraulic heterogeneity, creating diverse habitat conditions that support more robust aquatic ecosystems. Prior to any infilling or realignment works, fish salvage would be undertaken by a suitably qualified freshwater ecologist.

477. An assessment of the proposed works against the effects management hierarchy under the NPS-FM has been provided in the planning assessment (**Appendix 42**). The design would avoid the loss of river extent and values as much as is practicable. The main springheads and spring-fed channels would be retained and enhanced, with additional stream corridor width provided to buffer these systems from development. Where channel loss cannot be avoided, specifically in the case of the three modified drains and the realignment of stream channels, effects would be minimised and remedied through considered realignment, habitat enhancement of new and existing channel sections, and protection of groundwater pathways to maintain hydrological connectivity.

478. The river reclamation is required to implement the proposed stormwater management regime, maintenance of pre-development peak flows, avoiding increased flood risk, and

preventing adverse downstream hydraulic effects, and to provide a cohesive urban development. Retention of the existing drain alignments in all locations would compromise the ability to implement a cohesive stormwater network and would fragment the urban structure. The avoidance of reclamation would necessitate the extensive culverting of drains and watercourses to enable roads and infrastructure connections which would result in adverse ecological effects, reduced connectivity, and increased infrastructure complexity and cost.

479. It has also been a deliberate design approach to prioritise ecological enhancement over retention of low-value, highly modified farm drains with input from relevant technical specialists, notably aquatic ecology.

480. Spring-fed watercourses will be retained and enhanced where feasible, and new alignments will be designed with ecological oversight to improve habitat values, riparian margins, and water quality treatment. Generous buffer zones are provided for these watercourses to provide for the riparian enhancement, open space corridors and fresh plains on benched banks. Walking tracks are to be provided along the Ōhoka Tributary, fostering connections between people and nature and achieving net enhancement to these existing waterways.

481. This project would represent a transition from a fragmented, drainage-focused landscape to an ecologically integrated watercourse network that prioritises the restoration and long-term resilience of spring-fed systems. When considered alongside the comprehensive ecological mitigation and enhancement measures, the effects of the proposed infilling and realignment works are assessed as no more than minor. The proposal would align with the fundamental concept of the NPS-FM and provide for integration of urban development with freshwater ecosystem values – specifically that *Te Mana o te Wai is about restoring and preserving the balance between the water, the wider environment, and the community* (NPS-FM).

482. While stream and drain realignments could alter local flow regimes and affect flood conveyance capacity, these impacts are holistically addressed in the stormwater management design. The development layout, watercourse realignments, and proposed reclamation would be assessed collectively to ensure stormwater runoff is appropriately managed and discharges to receiving environments do not exceed pre-development peak flows. This approach would ensure flood risk is not increased and downstream hydraulic effects are avoided.

483. A total of six culverts are proposed to facilitate new internal road crossings, with additional culverts proposed for access over roadside drainage channels. These culverts would be designed to meet fish passage requirements under clause 70 of the NES-FM. Their increased capacity would also enhance stormwater conveyance, particularly in areas like the Ōhoka Tributary, which experiences high flows during storm events.

484. Single-span bridges are also proposed and would be constructed above the 2% AEP floodplain. These structures would span the watercourse without impeding flows or reducing the stream's natural flood carrying capacity, thereby avoiding the need for in-stream works or structures.

485. Additionally, stormwater attenuation basins have been incorporated into the subdivision design. These basins would temporarily store runoff and discharge it gradually over a four-day period, reducing peak discharge rates and aligning with best practice for surface water management. Collectively, these measures would ensure that both flood protection and ecological values are upheld throughout the development.

486. Although some waterway loss is proposed, the offsetting and compensation measures are expected to result in a net improvement in aquatic ecological values. Increased baseflow volumes and ecological enhancements through riparian planting would improve the condition of retained streams and springheads. An Ecological Management Plan is proposed as a condition of consent to ensure that instream works are carried out in accordance with mitigation measures, alongside restoration and enhancement plans for springheads, streams, and wetlands.

Wetlands

487. The proposed development would result in adverse effects on natural inland wetlands within the site, including the permanent loss of approximately 3.5 hectares of wetland area due to infilling and associated alterations to existing hydrological flow paths. These changes are necessary to enable the subdivision layout and associated infrastructure, including roads and stormwater systems.

488. The aquatic ecological assessment addendum **(Appendix 19)** assigns the wetlands a moderate ecological value, incorporating the policy direction that natural inland wetlands are to be retained and protected. This value rating is not inconsistent with the wetlands being degraded in their current state, as the assessment records that the wetlands have been affected by past land use and stock grazing. Rather, it reflects that, despite this degradation, the wetlands retain ecological attributes which elevates their assessed value within the Environment Institute of Australia and New Zealand (**EIANZ**) framework.

489. The high ecological 'level of effect' identified in the aquatic ecological assessment (**Appendix 19**) arises primarily from the interaction between the overall 'moderate' ecological value of the wetlands and the very high magnitude of effect associated with the permanent removal of wetland extent. This outcome aligns with the EIANZ methodology, which is inherently conservative and effects-driven. The planning assessment recognises this outcome, but focuses on the nature and distribution of effects in the context of the proposal. In particular, the wetlands to be removed are predominantly of lower ecological value and are highly degraded as a result of historic and ongoing farming activities. In contrast, the higher value wetland habitats associated with the spring systems and permanent streams are to be retained and enhanced as part of the proposal. In this context, the ecological level of effect reflects the magnitude of change at a site scale, whereas the planning framework provides for an assessment that considers the characteristics of the affected wetlands, together with the retention and enhancement of higher value systems within the site.

490. When considered in isolation, the permanent removal of approximately 3.5 ha of natural inland wetlands would result in more than minor adverse effects. This reflects the loss of wetland extent and associated ecological values, notwithstanding the degraded condition of those wetlands. However, the proposal incorporates a comprehensive package of measures that substantially address those effects. In particular, higher-value wetland

features, including springheads, groundwater seeps and associated riparian wetlands, are retained and enhanced. The proposal also provides for the restoration and creation of wetland habitats, including fresh plains wetlands, riparian wetlands, and wetlands within stormwater management areas, supported by extensive indigenous planting and long-term management. These measures result in an overall increase in wetland extent from approximately 4.3 to 4.55 hectares, together with improvements in ecological function, connectivity, and habitat diversity across the site.

491. **Table 13** summary provides a comparison between wetland areas affected and those proposed for retention or creation:

Table 13: Wetland summary

Summary of Wetland Removal and Retention/Creation	
Wetland Category	**Area (ha)**
Existing natural wetlands on-site	4.3 ha
Wetland removal (proposed)	3.5 ha
Wetlands retained (within setbacks)	0.84 ha
Springhead restoration areas	0.25 ha
Fresh plains riparian wetlands (created)	0.63 ha
Stormwater wetlands and wet ponds/basins (created)	2.83 ha

492. The proposal has been assessed using the effects management hierarchy under section 3.21 of the NPS-FM, which requires applicants to:

- Avoid adverse effects where possible
- Minimise effects where avoidance is not possible
- Remedy or offset residual effects
- Provide compensation only where offsetting is not practicable

493. The proposal aligns with this hierarchy by retaining and enhancing priority wetlands, minimising loss elsewhere, and offsetting unavoidable impacts through creation of new wetland habitat, as well as compensation through the creation of stormwater wetlands and ponds/basins.

494. While complete avoidance of wetland loss has not been achievable, the proposal has minimised effects through the retention of approximately 0.84 hectares of natural inland wetlands. These retained wetlands are primarily located around stream margins and springheads, which represent areas of higher ecological value. These wetlands are proposed to be enhanced and protected through restoration planting and increased setbacks.

495. Where the loss of wetland extent cannot be avoided, practical steps are proposed to offset the loss of wetland values through restoration and creation of new wetland areas. It is acknowledged that true 'like-for-like' replacement is not achievable on this site due to differences in hydrological and ecological characteristics. However, the offsetting and compensation approach has been designed to provide for a diverse range of wetland ecosystem types, improving the overall ecological function and biodiversity values within the development footprint.

496. The offset and compensation package recommended by Instream Consulting (**Appendix 19**) and incorporated into the design includes the following key components:

497. Restoration and enhancement of existing wetlands as follows:

- Springhead and stream edge wetlands to be enhanced through indigenous planting, increased setbacks, and fencing to exclude stock.

- Proposed setback distances include 30 metres around the Northern and Central Springs and 20 metres around the Southern Groundwater Seep.

- Site observations have shown pugging and disturbance around existing springheads, indicating opportunities for wetland expansion if these areas are rehabilitated.

- Restoration would increase both the extent and ecological value of these habitats.

498. Creation of riparian wetlands as follows:

- New riparian wetlands are proposed to be created on benched terraces adjacent to the Ōhoka Stream Tributary, the Central Spring Channel, and the South Ōhoka Branch.

- These wetlands would be constructed and planted with appropriate native wetland species.

- These systems would improve habitat complexity and water quality buffering along key watercourses.

499. Creation of wetland habitat within SMA's as follows:

- Although artificial, the SMA wetlands would provide functional wetland habitat for native flora and fauna and contribute to the broader wetland offset objectives.

- These proposed wetlands include a mix of open water zones (approx. 40%) and shallow planted wetland zones (approx. 60%).

- Indigenous wetland planting would be incorporated across all SMA wetland areas, consistent with the stormwater assessment (**Appendix 31**) and landscape design plans (**Appendix 23**).

- Additionally, stormwater wet ponds and basins, while intermittently wet, would also be partially planted with native wetland vegetation (approximately 20% of their area) to contribute further habitat.

500. Although the proposal involves the removal of approximately 3.5 hectares of natural inland wetlands, these areas are generally degraded or modified by historic land use. Relying on the recommended wetland offsetting and compensation strategy (**Appendix 19**) which seeks the retention and enhancement of higher ecological value springhead wetlands and creation of riparian and artificial wetland habitats, it is considered that appropriate offsetting and compensatory actions can be achieved.

501. A condition of consent is proposed requiring an ecological management plan be prepared by a suitably qualified ecologist at the detailed design stage. This plan would guide the implementation, monitoring, and maintenance of wetland and stream restoration and enhancement areas, springhead restoration, to ensure ecological performance outcomes are achieved over time.

502. At a broader catchment scale, the approach consolidates and enhances the wetland network, resulting in a more resilient and functional system that delivers greater ecological integrity and water quality outcomes than would be achieved through incremental enhancement of fragmented and degraded wetlands in their existing locations.

503. The proposal achieves a net environmental gain through the application of the effects management hierarchy, including avoidance where practicable, minimisation, remediation, offsetting, and compensation. This is reflected in:

- Enhancement and creation of 1.72 hectares of wetland habitat (including creation and enhancement of stream habitat, riparian margins, and buffers).

- Stormwater wetlands and wet ponds/basins (2.83 hectares). While these systems differ from natural wetlands, they contribute to ecological function and habitat provision and exceed the remaining un-offset loss (approximately 2.58 hectares).

504. When the full mitigation, offsetting and compensation package is taken into account, together with the retention and enhancement of higher-value wetland features and the resulting improvement in overall ecological health of waterways within the site, the residual adverse effects are reduced to a level that is no more than minor. It is acknowledged that wetland loss has not been fully avoided, and that some residual adverse effects remain. However, those effects are appropriately managed through the comprehensive application of the effects management hierarchy and are outweighed by the resulting gains in wetland extent, ecological function, and habitat values across the site.

Groundwater / Hydrology

505. The following assessment addresses groundwater and hydrology related effects in the operational phase of the development. The effects of dewatering and dust suppression during the construction phase are separately addressed in the ‘construction activities’ section below.

Subsoil Drainage and Groundwater Interception

506. Subsoil drainage is proposed as part of the site development to manage shallow groundwater levels. The hydraulic conductivity assumed for the assessment reflects the presence of highly permeable, gravel-based strata. Given these conditions, along with the narrow profile and shallow installation depth of the subsoil drains, any associated drawdown is to be localised in nature.

507. The PDP assessment (**Appendix 17**) considers that due to the high permeability of the underlying material, the drawdown effect is predicted to be limited in extent and would not result in widespread lowering of groundwater levels. While there is some uncertainty around actual drainage flow rates, the assessment adopts conservative assumptions. For the purpose of consenting, a maximum drainage flow limit of 10 L/s is proposed. This limit accounts for the range of potential variability and provides a precautionary approach to managing drainage outputs.

508. Importantly, the water collected via subsoil drains is discharged back into the proposed SMAs. These discharges are non-consumptive in nature, as the water remains within the site and infiltrates back into the groundwater system. The SMA outlets are designed to correspond with the highest predicted groundwater levels at each location, ensuring no net loss of groundwater to surface water systems, The proposal is therefore not anticipated to have adverse effects on surface water flows given the low predicted average rate of drainage and that the system is designed that any discharge to surface water from the SMAs only occurs when groundwater levels rise above natural levels (i.e. during rainfall events). In such cases, only stormwater, not groundwater, is discharged offsite.

509. As the proposal involves the abstraction of shallow groundwater via sub-soil drains and the subsequent discharge of water of similar quality back into the ground within the site, no adverse effects on groundwater quality are anticipated. The drainage water will infiltrate within the SMA's and therefore will provide natural filtration to occur.

510. In addition to receiving the subsoil drainage, the SMAs are designed to passively intercept shallow groundwater. This interception varies in response to seasonal groundwater level fluctuations and forms part of the overall stormwater management function, providing attenuation and treatment prior to reinfiltration to the underlying aquifer.

511. To prevent groundwater discharge under normal conditions, SMA outlets are positioned at or above the highest anticipated groundwater levels. This ensures that intercepted groundwater remains onsite and recharges the shallow groundwater system, resulting in no net loss from the aquifer, the system does not abstract water for off-site use or remove it from the hydrological cycle. All intercepted groundwater is returned to the ground within the same SMA, without significant delay. The sub-soil drainage is distinct from this passively intercepted groundwater given it is temporarily piped before discharging non-consumptively back to groundwater.

512. In addition, existing resource consents CRC991022 and CRC991827 – which currently authorise significant volumes of shallow groundwater abstraction for irrigation – would be surrendered upon development of the site. While abstraction of deep groundwater is proposed for future community water supply, the overall effect of relinquishing the irrigation consents would be a substantial reduction in potential interference with neighbouring

shallow bores. This would result in an overall positive effect on the local groundwater system compared to the existing consented situation.

513. The effects of the proposed sub-soil drainage system are considered to be less than minor.

Hydrology

514. Potential impacts on groundwater are a relevant consideration given the high water table of the site and the risk of construction of horizontal infrastructure intercepting groundwater. This matter has caused issues in the past in other subdivisions where backfilled infrastructure trenches have short-circuited groundwater flow with consequential issues such as dried up waterways previously fed by groundwater. The risk must be properly considered and managed.

515. The hydrology assessment (**Appendix 20**) finds that the potential re-direction of groundwater flow paths can be adequately avoided such that spring flows on the site would not be adversely affected provided appropriate engineering measures are implemented (as per the measures outlined in the SMP – **Appendix 30**). Further, PDP consider that the proposed buffer distance of 20 - 30 metres surrounding spring heads and the Groundwater Seep further reduces the risk of any potential adverse hydrological effects on spring flows.

516. PDP also consider that the proposal would not adversely impact groundwater recharge despite the increase in impervious surface within the site

517. Accounting for the PDP assessment, it is considered that the hydrology effects of the proposal are no more than minor.

Terrestrial Wildlife

518. The proposal would result in the removal of vegetation, structures and other features that provide habitat for native lizard species, particularly Canterbury grass skink. Baseline surveys undertaken by PDP have confirmed the presence of this species, which is classified as “At Risk – Declining”, and therefore of high ecological value.

519. All native lizards are protected under the Wildlife Act 1953, and their habitats may constitute significant ecological values under the RMA. Accordingly, the Lizard Management Plan (**LMP**) prepared by PDP (**Appendix 24**) provides a structured, best-practice framework to manage adverse effects in accordance with DOC guidance and statutory requirements.

520. The LMP included measures to appropriately avoid or minimise potential adverse effects. Avoidance of habitat loss is not practicable given the nature and scale of proposed development; however, minimisation measures include ongoing habitat management (e.g., staged mowing/grazing to reduce habitat suitability) and supervised staged vegetation clearance during the active lizard season.

521. A full lizard salvage and relocation programme would be undertaken by suitably qualified, DOC-authorised herpetologists under a Wildlife Act Authority. Salvage would occur prior to and/or during works using best-practice methods (including traps and directed searches), with captured individuals relocated to a purpose-designed on-site relocation area. This area would be enhanced in accordance with a habitat enhancement plan (included in **Appendix 24**) providing native planting, refugia creation, weed control, and predator

management. It would also be legally protected and physically safeguarded. The relocation approach reduces the risk of mortality during works and ensures compliance with statutory protection requirements.

522. Post-relocation monitoring and reporting would be undertaken to assess the success of mitigation measures and inform adaptive management.

523. Overall, the adverse effects on native lizards are appropriately managed, with the objective of achieving no net loss of lizard populations and providing for their long-term protection within the development.

524. No other noteworthy terrestrial ecological values have been identified within the site.

Avifauna Wildlife

525. Desktop and field surveys undertaken by PDP (**Appendix 25**) indicate the site supports a low diversity assemblage of common bird species. While the wider area includes records of Threatened and At Risk species, these are primarily associated with higher quality wetland and riverine habitats that are not present on the site in any meaningful form.

526. Field surveys recorded 13 species on the site, comprising a mix of introduced and common native species, all of which are classified as 'Not Threatened'. Bird activity was largely confined to shelterbelts, scattered trees, and farm structures, with limited use of open pasture.

527. Overall, the site provides low-value avifauna habitat and is not significant for indigenous birdlife. The proposed development is therefore unlikely to result in significant adverse effects on avifauna, with proposed native planting expected to provide some habitat enhancement over time.

Reverse Sensitivity

528. The site shares a boundary (separated by Bradleys Road) with land used for rural productive activities, predominantly pastoral farming. While these activities may produce noise and odour at times, residential areas commonly border rural productive activities, and residents accept such effects. Further, **Figure 8** over the page indicates the location and extent of existing farm effluent spreading consents in the vicinity of the site. Effluent spreading is authorised in the blue areas. When the practice ceases within the site, future residential activities within it will be located beyond the buffer zones indicated around the existing consented effluent spreading areas.

529. Another potential reverse sensitivity concern relates to the National Grid which traverses the western corner of the site. Compliance with the rules and regulations designed to protect this important infrastructure would ensure the operation, maintenance and upgrade of the National Grid is not compromised. The Applicant engaged with Transpower to determine the safeguards that the proposal must adhere to. Proposed conditions of consent would ensure that the National Grid is not adversely affected by the proposed activities.

530. It is considered that there are no other potentially incompatible activities in the vicinity. Accordingly, the potential adverse reverse sensitivity effects from the proposal are considered to be negligible.

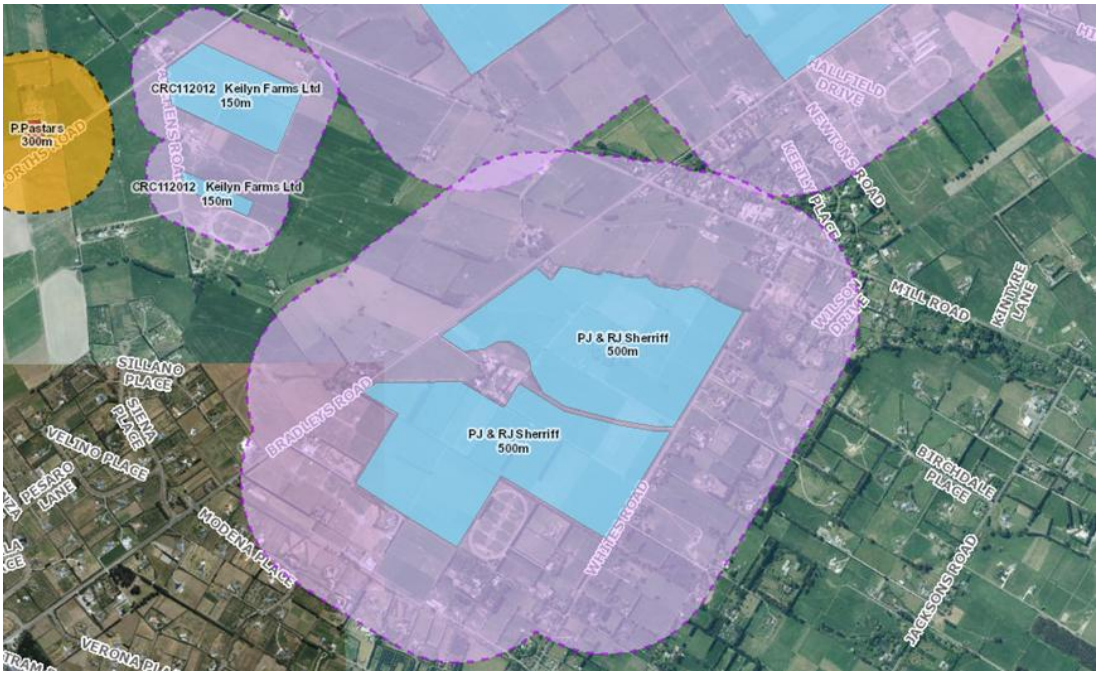

Figure 8: Effluent spreading consent areas
Source: Waimakariri District Council

Sites of Significance to Iwi and Cultural Considerations

531. The POWDP identifies the Waimakariri River and its tributaries (which include Ōhoka Stream) as having significance to Māori. Ōhoka Stream is ngā wai, which is described in the POWDP as water and representing the essence of all life, is integral to tribal identity, and source of mahinga kai. As discussed previously, the principal waterways that run through the site form a key feature of the proposal. The waterways are proposed to be enhanced which aligns with previous feedback from local rūnanga.

532. Based on that previous feedback from local rūnanga via Mahaanui Kurataiao (**MKT**) during consultation on a previous plan change process in 2022, it is anticipated that the proposed stormwater management solution and adoption of Accidental Discovery Protocol will assist in mitigating potential adverse effects development on cultural values. Further, the Applicant is committed to engaging with local rūnanga regarding the planting proposal in the detailed design phase. The intention is to establish locally sourced indigenous vegetation which would support cultural values associated with the site.

533. The proposed realignment and enhancement of spring-fed waterways, alongside the infilling of low-value modified drains, has been carefully designed to avoid adverse effects on cultural values, particularly those identified by MKT in 2022. At that time, MKT recommended that, where practicable, a 20-metre setback be established between subdivision development and waterways, with a 10-metre indigenous planting buffer included within this setback to support nutrient uptake and biodiversity enhancement.

534. These recommendations have been incorporated into the current proposal through the provision of generous riparian setbacks and the use of locally sourced indigenous planting informed by ecological advice. The enhancement of naturalised stream corridors, the consolidation of baseflows to improve hydraulic and ecological function, and the protection of springheads and groundwater connectivity all reflect values consistent with kaitiakitanga and the mauri of freshwater.

535. While it is acknowledged that there is inherent cultural sensitivity and tension associated with the loss of wetland areas and the ongoing discharge of stormwater to surface water, the proposal has been carefully developed to respond to these concerns through the proposed ecological and water quality improvements. The wetlands proposed to be infilled are highly modified and degraded, with limited remaining ecological or hydrological function. Their condition has been compromised through farming, and they present with low ecological value. Importantly, the proposal replaces these degraded areas with a network of naturalised, spring-fed waterways designed to improve ecological connectivity, increase hydraulic diversity, and provide resilient aquatic habitat.

536. To ensure that surface water quality is not adversely affected, all discharges from the development are proposed to be treated and attenuated in accordance with best-practice stormwater management. Water quality would be subject to ongoing monitoring to confirm that the relevant freshwater quality limits under the LWRP are met. The removal of intensive farming activity – including associated nutrient inputs and drainage – further reduces the long-term contaminant load to the receiving environment.

537. Although elements of the proposal may not fully align with all cultural expectations, particularly regarding the loss of wetland remnants, the overall outcome delivers measurable improvements to freshwater quality and ecological function. These improvements reflect values of environmental stewardship and kaitiakitanga and are likely to be viewed positively in the context of restoring the health and mauri of the receiving freshwater environment.

538. The proposal includes a groundwater take for community water supply, as well as the use of subsoil drainage, wetland and wet basins and temporary dewatering during construction in areas where shallow groundwater is encountered. These activities can be culturally sensitive due to the importance of groundwater and its role in maintaining the mauri of spring-fed systems and connected surface water bodies. Recognising this, the groundwater take is limited in volume and managed under a consented framework to avoid drawdown effects. The proposed surrender of the shallow irrigation takes and new deep bore community water supply will result in a net benefit to groundwater levels and springs.

539. Dewatering will be temporary and carefully managed, with appropriate setbacks from spring-fed channels and controls in place to prevent sediment-laden or contaminated water from entering surface waterways. Sub-soil drainage and the SMA's where groundwater is intercepted, will be discharged back to groundwater to maintain hydrological connectivity. Collectively, these measures ensure that groundwater abstraction and drainage activities are respectful of underlying cultural values and avoid significant adverse effects.

540. Overall, the removal of agricultural drainage and shift to focussing on enhancing the ecological function of the spring fed waterways is expected to restore, rather than degrade,

the relationship between groundwater and surface water – a shift that aligns positively with cultural aspirations for the health and integrity of freshwater environments.

Economic

541. Savvy Consulting assessed the two key economic costs of the proposed development being potential adverse distributional effects on existing centres arising from the local centre, and the loss of productive land and primary production activity (**Appendix 39**).

Retail Distribution Effects

542. Using a retail gravity model focused on food, grocery, and liquor sectors, Savvy Consulting has evaluated how the proposed local centre might impact existing centres in the district. The analysis found that even under strong development scenarios, adverse effects on nearby centres – especially Mandeville – would be minor and acceptable. The new centre is unlikely to significantly harm the vitality or vibrancy of existing retail and service hubs.

Loss of Primary Production

543. The subdivision would permanently remove land currently used for dairying and cattle breeding. However, Savvy Consulting considers this loss negligible in the context of the district's total productive land. Savvy Consulting also considers the economic impact of losing current farming operations to be minor, with minimal long-term effects on the regional economy.

Economic Costs Conclusion

544. Overall, the economic costs of the proposed development are assessed as ranging from less than minor to minor at both the district and regional levels.

Education

545. Based evidence provided by Dr Gabrielle Wall[24] during the Proposed Plan hearings, the likely demographics of the future resident population resulting from the proposal is estimated to generate approximately 250 primary aged students and 150 secondary aged students. Of these, it is likely that 200 students would need to be accommodated in the local state primary network, and 75 within the local state secondary network. Approximately half of the secondary aged students currently residing in the area (the Mandeville-Ōhoka, Swannanoa-Eyreton, and Clarkville SA2s) attend state integrated or private schools, which accounts for the relatively low projections for the number of students accessing the local state secondary network.

546. Utilising the existing state education network, Dr Wall considered that primary aged students could be accommodated within Ōhoka School or split across Ōhoka School and Swannanoa School via an amendment to existing school zones.

547. The option of accommodating students in Ōhoka School would significantly increase its roll. The roll was 207 students in mid-2024 and would reach as many as 450 students over time if the proposal is approved. The existing size of the Ōhoka campus suggests it would

[24] See www.waimakariri.govt.nz/__data/assets/pdf_file/0026/160685/Evidence-of-Dr-Gabrielle-Julya-Howard-Wall-Ohoka-rezoning.pdf

be large enough to support a roll of this size, noting that additional infrastructure may be required.

548. The split zone option two would spread the impact of additional students across the network. To amend an enrolment zone, the Ministry of Education is required under Schedule 20, clause 4 of the Education and Training Act 2020, to formally consult with:

- the board of the school,
- the parents of the students at the school,
- the people living in the area for which the school is reasonably convenient,
- the students and prospective students of the school (depending on their age and maturity), and
- the boards of other schools that could be affected by the proposed scheme.

549. In terms of secondary education, the site is within the current Kaiapoi High School zone. Based on future projected growth in Rangiora and its surrounds, it seems preferable for secondary aged students to access Kaiapoi High School as the local state secondary school option. Further, Ōhoka is on a Kaiapoi High School bus route.

550. Accounting for the above assessment, it is considered future students would be able to be accommodated within the existing local education network. Engagement with the Ministry of Education, local schools including Ōhoka School (and possibly Swannanoa School) and Kaiapoi High School would be required prior to development commencing.

Historic Heritage

551. The proposed works would directly impact the recorded site of the Ōhoka Railway Station, established in 1875. The Underground Overground Archaeology (**UOA**) archaeological assessment (**Appendix 12**) finds that this heritage site has medium archaeological value, and the current development plans would result in most of the site being destroyed. UOA considers that the destruction of this heritage site would have a 'major' adverse effect. In the context of the assessment, a 'major' adverse effect means that the archaeological site is completely altered, and all archaeological values are removed or significantly reduced. UOA acknowledges the retention of an existing concrete loading bank structure within the site as a positive measure that would preserve some of the historical value and enhance its amenity.

552. Beyond the railway station, the works would also infill parts of what are likely to be 19th century drainage systems and may disturb unrecorded subsurface archaeological remains. These remains are potentially linked to domestic and agricultural activities from the 19th century. While no direct evidence of Māori archaeological sites was identified within the site, the possibility of encountering such sites cannot be ruled out.

553. The UOA assessment recommends the development be carried out in accordance with an archaeological management plan (also included at **Appendix 12**) which includes the following:

- contractor briefings,
- authority holder and contractor responsibilities,
- the role of the approved archaeologist,
- protection and mitigation methods,
- monitoring requirements,
- on-call and stand-down procedures,
- notification protocols for Māori material and kōiwi tangata, and
- reporting and dispute resolution mechanisms.

554. While the proposal would result in destruction of the majority of the remains of the Ōhoka Railway station, the site does not have significant heritage value and the concrete loading bank structure is proposed to be retained and integrated into a reserve. Provided the development proceeds in accordance with the management plan, the adverse effects on heritage values are considered to be no more than minor.

Construction Activities

Amenity Effects

555. The development of a new settlement involves significant construction works involving earthworks, dewatering, discharges, water diversions and construction of horizontal infrastructure over a period spanning several years. The subdivision construction works have the potential for adverse effects to arise during the construction phase. Appropriate management during the construction phase is essential to ensure that potential and actual adverse effects on the community and natural environment are suitably mitigated or avoided.

556. In terms of effects on neighbours and the local community, the proposed large-scale subdivision works, carried out over a prolonged period and eleven stages, have the potential to cause the following nuisance effects:

- Heavy machinery, trucks, and general site works can lead to persistent noise levels, disrupting peace and quiet. Early morning starts or weekend work can further amplify the impact.
- Construction traffic has the potential to cause minor delays and spread sediment over local roads.
- Earthworks and vehicle movement across the site can generate dust, particularly in dry conditions. This may affect respiratory health and lead to discomfort or property soiling for residents.

557. Cumulatively, the above effects can lead to neighbours having reduced enjoyment of their homes. The stress and frustration this can cause can build over years of intermittent disturbance.

558. The SMP seeks to mitigate potential nuisance effects by managing construction traffic and reducing dust and noise emissions for the benefit of the local community. A suite of construction related consent conditions is also proposed to ensure these effects are appropriately mitigated.

559. A key feature in managing construction and earthworks related effects is through erosion and sediment control measures. Inovo has prepared a SMP (**Appendix 30**) that sets out erosion, sediment control and dust measures that would be implemented for the proposed works to avoid or minimise the effects of erosion, sediment and dust on surface water, groundwater and surrounding properties.

560. By way of summary, the basis of the ESCP measures onsite would include:

- Limit of five hectares of un-stabilised soil, and earthworks areas to be stabilised as soon as practicable.
- silt fences,
- clean and dirty water diversion bunds/drains,
- SRP and decanting systems,
- flocculant chemicals, and
- stabilisation measures, mulching, grass seeding.

561. In addition to the overarching construction SMP, additional reports are proposed to be prepared to manage construction effects, as set out in **Table 14**. These plans are secured within the proposed draft conditions.

Table 14 Construction phase reports

Plan	Summary
ESCP including Dust Management, and Monitoring	In accordance with best practice, specific ESCPs, including dust management, would be prepared for each stage of development for certification by the consent authority as part of detailed design. This would describe the methods for erosion and sediment control and the discharge points for construction phase stormwater for that stage.
Groundwater and Spring Flow Monitoring Plan	This plan would be prepared to ensure the monitoring of groundwater and spring flows for the duration of construction activities that may interact with groundwater and for a period of time following completion of works.
Chemical Treatment Plan	This plan would be prepared to manage chemical treatment of construction phase stormwater discharge and dewatering water and provide details of flocculant dosing.
Streamworks Management Plan	Detailed design plans and construction methodology for works in Waterways, including the installation of culverts, and methodologies for reclamation, flow diversions, temporary channels and over pumping. Input must be provided by a

	suitably qualified freshwater ecologist to provide fish salvage and release and methods and timing of diversion to enable fish recovery.
Remedial Action Plan	Specific management actions for the remediation of contaminated areas including details on ESCP measures, stockpiling of contaminated materials, removal from site, reuse on site. A requirement of the RAP would be for site validation reporting to occur following remediation.
Ecological Management Plan	This plan will include the preparation of the restoration and enhancement plans for waterways, springheads and wetlands as well as the monitoring and maintenance plans for these features. It would also include any pest and predator management that may be required. This will be prepared by a a Suitably Qualified Freshwater Ecologist in conjunction with a Landscape Architect

562. Properly managed, as proposed, the adverse effects of earthworks and construction activities is considered to be no more than minor but acceptable.

Construction Phase Stormwater Discharge

563. The construction phase stormwater for each stage would be captured on site and directed to a sediment retention pond prior to discharge from the site.

564. The discharge point for the first stage is proposed to be the roadside swale/drain within Whites Road which discharges to the Ōhoka Tributary. The water discharged from site would meet the TSS requirements for water clarity.

565. As construction would be staged, the stormwater discharge would occur only on parts of the site where soil is exposed and prior to stabilisation occurring.

566. The proposed erosion and sediment control measures would ensure that construction phase stormwater run-off is captured and managed so that no 'dirty' water would be discharged from the site during construction. Earthworks areas would be grassed and stabilised (road areas with aggregate/base course) as soon as possible after completing earthworks.

567. The site is predominantly flat and traversed by existing watercourses, including spring-fed streams and farm drainage channels. Flood modelling undertaken by PDP (**Appendix 22**) illustrates the current surface water flooding patterns across the site. Surface water is observed to accumulate within these existing streams and drains, as well as in natural depressions and wetland areas present on-site.

568. During the construction phase, stormwater will be retained on-site within each designated stage area prior to discharge. A sedimentation pond will be constructed for each stage, appropriately sized to provide adequate treatment and storage capacity. The discharge from these ponds will be carefully controlled to ensure that flow rates do not exceed pre-development levels.

569. The SMP outlines the ESCP measures to be implemented during the construction phase (**Appendix 30**). These measures are designed to ensure effective management of stormwater discharge quality throughout the works. Key controls include the diversion of sediment-laden (dirty) water to specifically designed Sediment Retention Ponds (SRPs),

the application of flocculants to enhance sediment removal, and other standard ESCP practices. Collectively, these controls are expected to maintain discharged sediment concentrations within acceptable thresholds—specifically, below 50 milligrams per litre for discharges into spring-fed waterbodies and below 100 milligrams per litre for all other receiving environments.

Flocculants

570. In periods of heavy rain or long rainfall periods flocculants may be used to ensure that the TSS requirements can be met. Chemical coagulants and flocculants are commonly used for sediment removal of fine particulates that will not easily settle out of solution and is a recognised method in the Erosion and Sediment Control Toolbox for Canterbury. Turbidity from stormwater entering surface water can significantly degrade the habitat of fish and other aquatic species; the aim of chemical dosing is to reduce the sediment load within the discharge thereby protecting the downstream environment.

571. However, the use of flocculants has the potential to cause adverse effects by way of discharging contaminants to nearby surface water. This can potentially affect water quality and aquatic ecology.

572. If aluminium-based flocculants are used, then discharges would be managed so the pH level of the discharged water stays with the range of 6.5–8.5 and the aluminium level does not exceed 0.055 g/m³. While organic flocculants are available, these have potential to impact the quality of discharge in other aspects.

573. A chemical management plan is proposed to be required prior to the commencement of works that provides details regarding dosing. The proposed consent conditions specify the need to carry out bench testing to ensure the correct chemical dose is added to the ponded water to minimise the coagulant or flocculent usage.

574. Overall, the proposed erosion and sediment control measures outlined in the SMP, including staged construction, on-site stormwater retention, appropriately sized sediment retention ponds, and flocculant-assisted treatment, will ensure that stormwater discharges during the construction phase are effectively managed. The implementation of these controls will prevent the discharge of untreated sediment-laden water and ensure compliance with water quality thresholds for receiving environments. Given the flat nature of the site, the containment of stormwater within each stage, and the progressive stabilisation of exposed areas, the potential for adverse effects on water quality, hydrology, and downstream environments will be less than minor and can be suitably avoided or mitigated through the proposed management approach.

Works in Surface Waterbodies

575. The proposal has the potential adverse effect water quality due to sediment discharge and machinery operating in the waterbodies for proposed realignment and installation of culverts. Contaminants such as hydrocarbons from machinery can potentially cause adverse effects, as well as the discharge of sediments.

576. Potential effects of fuel spills would be managed by ensuring fuel is not stored on site (or over 100 metres from any waterbodies), with refuelling to take place at least 20 metres

from any waterbody on site. Specific ESCPs would be prepared for the works in waterways prior to commencement of each stage to suitably manage these works.

577. The methodology for the installation of culverts would be based on the following:

- Where there is no water in the waterway, sandbags would be used to prevent any potential water seepage into the waterway.
- Sediment excavated would be removed from the waterway.
- Fish relocation will be undertaken by a suitably qualified person to capture and transfer the fish.
- Clean aggregate would be placed in the waterways to reduce the discharge of sediment to the water.
- Where water is present, this would be over-pumped (for short duration work) or diverted in a temporary diversion channel (for longer work periods).
- Dirty water would be treated (settlement/silt tanks) before being discharged back into the same waterway.

578. The realignment of the rivers/drains would be constructed entirely 'off-line'. The connection to the upstream and downstream locations would only occur once the banks are suitably stabilised. This would ensure minimal temporary release of sediments at the time of connection of the channels. For temporary pumping, the design will be sized for a one-year peak discharge from the contributing catchment.

579. In rain events, water would be diverted around the works areas by way of over pump and would discharge back into the drains. Scour pads, geotextile cloth or rip-rap boulders would be used at the discharge point for the where water is being released. All works would be undertaken in accordance with the ECan Erosion and Sediment Toolbox.

580. Streams, springs and wetlands which are to be retained would be fenced to ensure sediment from bulk earthworks does not discharge into the stream. At the time of enhancement of these areas, including the proposed benching / earthworks adjacent to the waterways and riparian planting, appropriate ESCP measures would be utilised to ensure sediment laden water does not discharge to surface water.

581. A non-consumptive take and discharge from the surface waterbody and back to the surface waterbody (commonly considered a diversion) is proposed during instream works (i.e. culvert installation and stream re-alignment). The rate, volume and timing of the take would depend on the flows within the waterway at that time. Ōhoka Tributary has surface flow limits. The take and discharge would not result in any adverse effects on downstream users with the flow being maintained at the exit point from the site as the rate of take would be the same rate as discharge. Fish passage would also be maintained with similar hydraulic conditions. The discharge of the diverted water back into the original channel would not introduce any contaminants into the water and a plastic liner would prevent sediment from entering diversion channel.

582. For the reclamation of waterways (to be filled), including prior to the realignment of waterways, fish salvage would be undertaken by an ecologist prior to dewatering.

583. Following completion of earthworks within waterways and realigned waterbodies, the works areas would be stabilised. Accordingly, there is no need for remediation or long-term treatment of the excavations and therefore no associated actual or potential adverse effects.

584. Ongoing maintenance of the culverts and bridges would be included in the operations and maintenance manual for the stormwater system. This is proposed to be addressed via a condition of consent.

Dewatering

585. The proposed earthworks on site include excavation primarily to a depth of 0.5 metres, with deeper cuts occurring for service trenching (up to 2mbgl), SMA's and stream realignment.

586. As groundwater is shallow and would likely be encountered across parts of the site, there is the potential for accidental release of contaminants or exposed groundwater. The proposal includes dewatering given the high-water ground level. The dewatering would primarily be for egressed groundwater into the bottom of trenches, SMA's and shallow excavated areas from 1.5mbgl where the strata is more permeable.

587. The works are proposed to occur in the warmer and dryer months when the groundwater table is at its lowest point to reduce the possibility it is encountered during excavations.

588. Potential adverse effects associated with dewatering are:

- subsidence of the ground due to dewatering (lowering of the water table),
- interference in the groundwater supply to the surrounding bores due to a reduction in groundwater levels, and
- a change in streamflow in the surface waterbody due to a reduction in groundwater levels and inflows due to dewatering.

589. The dewatering assessment prepared by PDP (**Appendix 32**) provides an assessment of the proposed dewatering against the matters of discretion under rule 5.120. In summary:

- The dewatering would exceed a period of six months. Therefore, there is a risk of longer-term stream depletion, draw-down effects on neighbours and water quality impacts.
- The dewatering may occur in potentially contaminated area. It is anticipated that remediation works would be undertaken in accordance with a RAP prior to bulk earthworks and dewatering occurring. As part of this work, a site validation report would be required. To ensure no contaminants are potentially mobilised and discharged to surface waterway, it is proposed that groundwater quality samples are collected to confirm the quality of discharge.

- The quality parameters for discharge would require compliance with the relevant LWRP Schedule 5 values for 95% species protection after mixing. Where this is not achieved then treatment may be required prior to discharge or the water directed back to groundwater (i.e. groundwater will be pumped to silt tanks prior to clean water being discharged back into a nearby waterway)

- The groundwater take would generally be around 2.5mbgl and would not result in the groundwater level being lowered more than 8mbgl. Given the strata it is considered that the dewatering would occur within gravel-based strata which is not considered to be susceptible to settlement effects from dewatering.

- It is anticipated that abstracted groundwater would discharge to the surface waterbody. Where the abstraction for dewatering is occurring between two surface waterbodies the discharge would be split evenly between the two surface water bodies.

- The potential for stream depletion is considered to be less than what might currently occur given the consented water take for irrigation which allows for a combined abstraction rate of up to 105.6 L/s. It is noted that dewatering would not occur at the same time that irrigation is occurring. The abstracted water would discharge back to the streams.

- While dewatering has the potential to have adverse effects on community, group or private drinking water supplies, the proposed dewatering is not anticipated to significantly affect the existing supply to nearby bores. The proposed abstraction is less than the consented irrigation take, and the discharge would be back to the hydraulically connected surface water bodies. PDP concluded that when comparing with the baseline of what is currently consented, there would be significantly less drawdown and therefore effects on neighbouring drinking water supply bores would be less then minor.

- There is a requirement that the rate of flow in the river is at least five times the rate of discharge. This is not likely to be met given the flows in the watercourse is not always consistent.

590. Overall, the effects of dewatering are considered to have minor effects, given the ongoing nature of dewatering during the extended construction period anticipated to deliver the subdivision, however dewatering can be managed through appropriate treatment (using silt tanks where necessary) and erosion, sediment and control methods.

Dust Suppression

591. The proposed abstraction of groundwater for dust suppression is appropriately assessed as a restricted discretionary activity under Rule 8.5.12 of the LWRP, with all relevant conditions considered to be met. The take from bore M35/0367 has been demonstrated, through a Schedule 9 assessment, to have a ‘low’ hydraulic connection with nearby surface water bodies. As a result, the take is not classified as stream depleting. In addition, the proposal does not contribute to any exceedance of groundwater allocation limits within the Eyre Groundwater Allocation Zone.

592. From an effects perspective, the proposal represents a substantial reduction in groundwater abstraction compared to the currently consented irrigation takes on the site. The proposed maximum volume of 500 m³/day (with an average of approximately 160 m³/day) is significantly lower than the existing consented volumes of up to 8,580 m³/day. Moreover, the existing irrigation consents will not be exercised during construction, and this is proposed to be secured through conditions. Consequently, both stream depletion and groundwater drawdown effects will be markedly reduced relative to the consented baseline.

593. The use of existing onsite bores provides a practical and efficient water supply without requiring new infrastructure, and the requested rates and volumes are considered reasonable for dust suppression purposes. There are no feasible alternative water sources, particularly given the over-allocation of nearby surface water bodies. Overall, the proposal will result in less than minor adverse effects on both surface water and groundwater resources and will provide a net positive outcome by improving the reliability of supply for existing surface water users through a significant reduction in total abstraction and associated stream depletion.

Effects Summary and Conclusion

594. The project has been assessed for various adverse effects on the environment as summarised below:

Urban Form

595. The proposal represents a significant change to the planned urban form for the district and Greater Christchurch sub-region. While it departs from the planned urban form, the proposal is considered acceptable due to the suitability of the site for development, noting also that there is strong demand for residential living in Ōhoka.

Loss of Agricultural Production

596. While urbanisation of the site would result in the permanent loss of productive farmland, the highest and best use of the land under the district plan provisions is for rural lifestyle purposes which would have a similar impact on primary production.

Transport

597. The proposal would generate significant additional traffic, impacting the wider road network. Recommended upgrades to accommodate the proposal include speed limits, shared paths, pedestrian crossings, and roundabouts. The Flaxton / Threlkelds / Skewbridge intersection upgrade is critical to avoid significant adverse safety effects.

Character and Amenity

598. The proposal would change the landscape character and visual amenity of the area. While the design aims to retain the key characteristics of the Ōhoka settlement, the increased local population and activity would result in a busier environment changing the lived experience in this location.

Urban Design

599. The proposal is well-considered, incorporating best practice urban design principles to ensure a highly functional, connected, aesthetically pleasing, and well-integrated development.

Geotechnical

600. The site is assessed as "TC1-like" with no geotechnical limitations anticipated to impact the proposed subdivision and development.

Land Contamination

601. Several areas within the site contain soil contamination that would require remediation as part of or prior to the site development. Remediation would ensure that the contamination levels would be below the relevant soil contaminant standards prior to the issue of completion certificates for each stage of subdivision.

Natural Hazards

602. Predicted flooding can be managed through elevated floor levels and allowance for flood flows in the design.

Infrastructure

603. The project involves significant new and upgraded infrastructure to service the proposed subdivision and future land use. All proposed infrastructure can be established without causing unacceptable adverse effects.

Aquatic Ecology

604. Key waterways from an aquatic ecological perspective include the Ōhoka Tributary, South Ōhoka Branch, and various springs and drains. The assessment notes the presence of fish species such as longfin eel, shortfin eel, brown trout, and upland bully which would be protected by the proposal.

605. While the proposal would result in the loss of approximately 3.5 ha of degraded natural inland wetlands and river reclamation, adverse effects have been minimised through the retention and enhancement of higher value springhead wetlands and are proposed to be offset through a comprehensive programme of restoration and creation of new wetland habitats. When assessed against the effects management hierarchy in the NPS-FM, and subject to ongoing ecological management and monitoring, the residual effects are considered to be appropriately managed.

Groundwater and Hydrology

606. The site has a shallow water table and is within a groundwater discharge zone. The proposal has been designed to avoid unacceptable adverse effects in respect of groundwater and the hydrology of the site.

Terrestrial Wildlife

607. Native lizards have been discovered within the site. Adverse effects on the lizards would be appropriately mitigated through capture and relocation in accordance with a lizard management plan.

Avifauna Wildlife

608. Site surveys identify a low diversity of common, non-threatened bird species, with habitat use largely limited to shelterbelts, scattered trees and farm structures. The site is of low avifauna value, and the proposal is unlikely to result in significant adverse effects, with native planting expected to provide some habitat enhancement over time.

Reverse Sensitivity

609. The proposal includes measures to ensure that the ability of Transpower to operate, maintain, upgrade, and develop the National Grid is not compromised. This includes conditions to prevent electrical hazards and ensure Transpower has unobstructed access to support structures and transmission lines.

Sites of Significance to Iwi and Cultural Considerations

610. The proposal the removal of agricultural drainage and shift to focussing on enhancing the ecological function of the spring fed waterways is expected to restore, rather than degrade, the relationship between groundwater and surface water – a shift that aligns positively with cultural aspirations for the health and integrity of freshwater environments.

Economic

611. The economic costs assessment finds that the proposed centre would have only minor, acceptable effects on nearby retail hubs, including Mandeville, and the loss of farmland is negligible and poses minimal economic impact on the district.

Education

612. While the project would impact schooling in the area, there are viable options to provide for future state primary school either within Ōhoka School (which would need to be expanded) or split across Ōhoka School and Swannanoa School. State secondary school students could attend Kaiapoi High School with options for travel to school including an existing school bus route via Ōhoka.

Historic Heritage

613. The site contains a recorded archaeological site comprising remnants of the Ōhoka Railway Station and the possibility of additional unrecorded sites. Provided the development is carried out in accordance with the archaeology management plan, the potential adverse effects are minor.

Construction Activities

614. Various environmental effects resulting from proposed construction activities have been assessed including in respect of amenity, stormwater management, potential use of flocculants, works in waterbodies and dewatering. Various mitigation measures are

included in proposed consent conditions to ensure the adverse effects are minimised to acceptable levels.

Conclusion

615. While the project would generate a range of adverse effects, they can be / are managed and mitigated through design, infrastructure upgrades and conditions of consent. The proposal aims to create a well-designed and connected development that aligns with best practice urban design principles.

Relevant Provisions of Planning Instruments

616. Clause 1(h) of Schedule 5 of the Act requires an assessment of the activity against relevant provisions of planning instruments. The relevant planning instruments are as follows:

- National Policy Statement for Electricity Networks (**NPS-EN**)
- National Policy Statement for Freshwater Management
- National Policy Statement for Indigenous Biodiversity
- National Policy Statement on Urban Development
- Canterbury Regional Policy Statement
- Canterbury Land and Water Regional Plan
- Operative Waimakariri District Plan
- Partially Operative Waimakariri District Plan

617. The full assessment is included at **Appendix 42** with brief summaries included below. For the sake of brevity, objectives and policies considered irrelevant to the proposal are not addressed in the assessment of statutory planning documents.

National Policy Statements

NPS-UD

618. The NPS-UD seeks to ensure that main urban centres of New Zealand are well-functioning. It sets out objectives and policies to support urban growth and development, addressing the needs of diverse communities.

619. The assessment finds that the proposal is consistent with all the relevant national policy statements. In respect of the NPS-UD, which is of principal relevance to the proposal, the key findings are that the proposal:

- would provide significant development capacity in an appropriate location,
- would contribute to a well-functioning urban environment,
- is able to be adequately serviced with infrastructure, and
- is well-connected along transport corridors.

620. These findings lead to the conclusion that the proposal is consistent with the NPS-UD.

NPS-FM

621. The overarching aim of the NPS-FM is to protect and restore the health of freshwater – putting the needs of the water itself first – while ensuring people have safe drinking water and can continue to meet their wider wellbeing needs in a sustainable way.

622. The development is assessed as generally consistent with the NPS-FM, particularly in improving higher-value waterbodies, managing water quality, and integrating cultural values through the protection of springheads. The loss of river extent has been avoided to the extent practicable. The key area of tension that remains is the loss of low-value wetlands, which does not align with the directive to avoid further loss of extent, though mitigation and offsetting measures are proposed to address residual effects.

NPS-IB

623. The NPS-IB seeks to ensure the maintenance of indigenous biodiversity – meaning no overall loss – through recognition of kaitiakitanga, community stewardship, protection and restoration of ecosystems, and safeguarding wellbeing for current and future generations.

624. Despite the loss of some low-value habitats, the proposal delivers a net positive ecological outcome through restoration and enhancement measures. Accordingly, it is considered consistent with the objective and policies of the NPS-IB.

NPS-EN

625. The NPS-EN aims to recognise and protect the national importance of the electricity transmission network by enabling its efficient operation, maintenance, upgrade, and expansion, while responsibly managing environmental effects and ensuring other land-uses do not compromise the network.

626. Given that the effects on the National Grid have been fully assessed and found to be acceptable, the development is deemed to accord with the policy intent of protecting nationally significant electricity infrastructure.

NPS-NH

627. The NPS-NH provides direction to ensure that natural hazard risk to people and property from subdivision, land use, and development is managed through a consistent, risk-based, and proportionate framework that avoids, mitigates, or reduces natural hazard risks based on their severity.

628. The proposal appropriately identifies and manages natural hazard risks, avoids creating unacceptable risk, incorporates climate change considerations, and ensures effects on surrounding properties are no more than minor. It is therefore assessed as consistent with the NPS-NH.

NPS-I

629. Although the Ōhoka project is not an infrastructure project per se, it engages the NPS-I which directs decision-makers to recognise and provide for the benefits/needs of infrastructure and to enable efficient development, operation and maintenance. The project

would result in the development of new infrastructure within the site and increase demand for existing infrastructure.

630. The NPS-I supports development of the proposed infrastructure within the site and supports recommended integration with existing networks including recommended upgrades. Further, the NPS-I supports:

- the imposition of proposed conditions that would ensure the ongoing protection of the National Grid,
- the assessment provided in respect of the impact of the proposed development on the existing rising main to Rangiora Wastewater Treatment Plant, and
- the proposed staging of the subdivision which allow time for recommended road upgrades outside the site to be planned and implemented.

Canterbury Regional Policy Statement

631. Based on the assessment in **Appendix 42**, the proposal is considered to be generally consistent with the RPS objectives and policies relating to urban design, freshwater management, biodiversity, natural hazards, landscape, transport integration, and infrastructure servicing. The application is however contrary to those objectives and policies that are directive in terms of the location of greenfield growth in Greater Christchurch. The conclusion in respect of consistency with the RPS is supported by a brief assessment of the environmental results anticipated by Chapter 6 of the RPS in **Table 15** below.

632. The assessment demonstrates that the proposal is consistent with the key outcomes sought by Chapter 6 of the RPS except where they are prescriptive regarding the location of urban growth.

Table 15: Anticipated environmental results

Anticipated Environmental Result	Analysis
1. Recovery and rebuilding is enabled within Greater Christchurch.	The proposal is consistent with this anticipated result to the extent that it remains relevant 14 years on from the Canterbury earthquakes.
2. Priority areas, Future Development Areas and existing urban areas identified provide the location for all new urban development.	The proposal is not consistent with this directive requirement.
3. Significant natural resources are protected from inappropriate development.	The proposal is consistent, noting significant natural resources would not be affected.
4. People are protected from unacceptable risk from natural hazards.	The proposal is consistent, noting natural hazard risks are avoided or managed to an acceptable level.
5. Infrastructure, and urban and rural development, are developed in an integrated manner.	The proposal is consistent, noting the assessment regarding effects on and integration with infrastructure.
6. The use of existing infrastructure is optimised.	The proposal is consistent, noting the assessment regarding effects on and integration with infrastructure.

7. Development opportunities are provided for on Māori Reserves.	Not applicable.
8. Growth is provided for through both greenfield and brownfield development opportunities.	Based on the economic assessment, the proposal provides sufficient development capacity to meet predicted unmet demand in the medium term.
9. Higher density living environments are provided.	High density living environments are not proposed (which responds to the existing characteristics of Ōhoka) but are provided for in the main urban areas of the district.
10. Greenfield development is provided for at a rate that meets demand and enables the efficient provision and use of infrastructure.	Based on the real estate advice and residential preferences survey, demand for housing in the vicinity is not currently being met. Noting that efficient provision and use of infrastructure would be achieved, and demand would be provided, the proposal supports the outcome sought.
11. Growth of rural towns within Greater Christchurch is sustainable and encourages self sufficiency.	The proposal significantly increases the level of self-sufficiency of Ōhoka by way of the proposed commercial centre.
12. Rural residential development is appropriately managed.	Not applicable
13. Development incorporates good urban design.	The proposal is consistent, noting the urban design assessment.
14. Areas of special amenity, heritage value, or importance to Ngāi Tahu are retained.	The proposal is generally consistent, noting the proposal provides for protection and enhancement of freshwater bodies (of importance to Ngai Tahu) and has only a minor impact on the historic heritage of Ōhoka.
15. Residential development contains a range of densities.	The proposal is consistent, noting the proposal allows for a broad range of lot sizes.
16. Transport infrastructure appropriately manages network congestion, dependency of private vehicles is reduced, emissions and energy use from vehicles is reduced, and transport safety is enhanced.	The proposal is consistent, noting the transport assessment.
17. The function and role of the Central City, the Key Activity and neighbourhood centres is maintained.	The proposal is consistent, noting the economic costs assessment.
18. Sufficient business land is provided for, and different types of business activity take place in appropriate locations, adopting appropriate urban design qualities.	The proposal is consistent, noting the proposed provisions for commercial activities and the economic costs assessment.
19. Development opportunities for a metropolitan recreation facility at 466-482 Yaldhurst Road are provided for.	Not applicable
20. Commercial film or video production activities are enabled to support the regional economy and provide employment opportunities.	Not applicable
21. Sufficient opportunities for development are provided to meet the housing and business needs of people and communities – both current and future.	Based on the real estate advice and residential preferences survey, sufficient opportunities for development are not adequately provided. The proposal therefore supports the outcome sought.

Canterbury Land and Water Regional Plan

633. The LWRP provides clear direction for how land and water are managed in Canterbury to ensure sustainable use, environmental protection, and integrated management of the region's freshwater resources.

634. The proposal is generally consistent with the objectives and policies of the LWRP, particularly in relation to integrated water management, water quality improvement, and the restoration of ecological function. The development incorporates stormwater treatment, stream naturalisation, riparian restoration, and improvements to fish passage, which collectively deliver enhanced freshwater outcomes relative to the existing land use.

635. While the proposal involves the loss of some natural inland wetlands, resulting in a degree of tension with the avoidance direction embedded within the NPS-FM (as reflected in the LWRP policy framework), this has been addressed through the application of the effects management hierarchy, including avoidance of higher value systems, minimisation of effects, provision of offsetting and compensation. These measures result in improved water quality, enhanced habitat connectivity, and greater ecological functionality across the site.

636. On balance, and having regard to the integrated environmental outcomes achieved, the proposal is considered to be consistent overall with the direction of the LWRP, notwithstanding this identified policy tension.

Canterbury Air Regional Plan

637. The objectives and policies of the Canterbury Air Regional Plan broadly seek (in relation to those activities emitting discharges to air) 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 addressing localised effects of discharges including relative to sensitive receptors. The proposal is consistent with objectives of the Canterbury Air Regional Plan.

Operative Waimakariri District Plan

638. An assessment of the proposal against the objectives and policies of the OWDP is included at **Appendix 42**. In summary, the proposal is largely aligned with environmental, infrastructure, transport, amenity, and urban-design provisions of the OWDP. However, its fundamental inconsistency lies in transforming rural zoned land into a large-scale urban environment. Despite this zoning conflict, the application demonstrates high mitigation, significant environmental enhancement, and high-quality design, resulting in overall acceptable outcomes when assessed on effects.

Partially Operative Waimakariri District Plan

639. The POWDP was notified on 14 July 2025, and the appeal period closed on 22 August 2025. An assessment of the relevant provisions in the POWDP is provided in **Appendix 42**. In summary, the proposal achieves strong alignment with most environmental, infrastructure, urban design, biodiversity, hazard, and amenity provisions of the POWDP. As per the assessment against the OWDP, the primary inconsistency of the proposal

regarding the POWDP lies in the location of urban development outside identified growth areas and within a Rural Lifestyle Zone. Otherwise, the assessment identifies that the proposal delivers:

- significant ecological enhancement,
- a well-functioning urban environment,
- integrated infrastructure,
- improved public access and amenity, and
- housing supply to meet demand.

Assessment Summary and Conclusion

640. The assessment identifies that the proposal has both strengths and limitations when considered against the full suite of national, regional, and district planning documents.

641. The development demonstrates policy alignment in areas relating to environmental enhancement, infrastructure integration, natural hazard management, and the creation of a well-designed urban environment. The proposal is supported by detailed technical assessments showing that three-waters servicing, transport upgrades, flooding mitigation, freshwater protection, and biodiversity restoration would be successfully achieved. These measures are expected to improve current water quality, enhance ecosystem health, and protect significant natural and cultural features such as springheads. The development also responds to area specific housing demand, delivering a range of residential opportunities and local amenities that support a well-functioning community.

642. The assessment also acknowledges significant planning tensions, particularly regarding urban growth. The site is located outside identified urban expansion areas in the RPS and Waimakariri district plans. The proposal is inconsistent with the planned settlement pattern, the anticipated rural zone outcomes. The loss of several low-value wetlands introduces further policy inconsistency, although this is partially offset by proposed ecological restoration.

643. Balancing these factors, it is considered that the proposal delivers significant benefits, and that many potential adverse effects can be appropriately avoided, remedied, or mitigated. At the same time, it is recognised that the project sits outside the anticipated growth framework, requiring the panel to weigh the benefits of the proposal (including positive effects) and national policy directions – such as those encouraging responsiveness to development capacity – against the fundamental departure from regional and district growth strategies.

Non-statutory Planning Documents

644. While the Act does not mandate assessment of non-statutory planning documents, the following provides brief commentary in respect of the Mahaanui Iwi Management Plan (**IMP**), Greater Christchurch Spatial Plan and the Waimakariri 2048 District Development Strategy (**DDS**).

Mahaanui Iwi Management Plan

645. The IMP sets out Ngāi Tahu's issues, objectives, and policies for natural resource and environmental management within the area bounded by the Hurunui River in the north and the Ashburton River in the south. The IMP is primarily a tool for the rūnanga in the area it covers. The plan also provides guidance to territorial authorities and others. A high-level assessment of the relevant themes of the IMP is provided below.

646. The IMP sets out the broad issues as well as the specifics for certain areas. These matters are considered below, as they are relevant to the proposal. The IMP does not identify any specific cultural values associated with the subject land that might be adversely impacted by its development.

Ranginui

647. The relevant matters identified in IMP are discharges to air and the protection of night-time darkness. The proposal does not contain controls on these matters. The main discharge to air that could occur through this proposal is the establishment of log burners or similar within individual houses, as well as discharges of dust to air during the development of the site. Such discharges are controlled by ECan through the Regional Air Plan. The OWDP and POWDP controls lighting appropriate to the rural context.

Wai Māori

648. Freshwater is of considerable cultural significance to rūnanga. The main matters of concern relate to water quality and quantity and mixing waters from different waterbodies. With the reticulation of effluent disposal from new dwellings the potential from adverse impacts on groundwater quality are limited. As discussed previously, the cultural sensitivity and tension associated with the loss of wetland areas and the ongoing discharge of stormwater to spring-fed surface water is acknowledged. The proposal has been carefully developed to respond to these concerns through the proposed ecological and water quality improvements. To ensure that surface water quality is not adversely affected, all discharges from the development are proposed to be treated and attenuated in accordance with best-practice stormwater management.

649. While there is some tension in respect of the Wai Māori values, the aquatic ecological values of the site would be improved by the proposal.

Papatūānuku

650. The use of land and how it is developed is of importance to rūnanga. This section identifies matters such as the urban planning, the subdivision and development of land, stormwater, waste management, and discharges to land. The potential effects of the proposal on the

environment have been discussed in the assessment of effects above. That assessment concludes that there would be minimal adverse impacts on the quality of the natural environment as no waste or contamination would be discharged in a manner that would compromise the mauri of surface or groundwater.

Tāne Mahuta

651. This section addresses the significance of indigenous biodiversity and mahinga kai to rūnanga. The application site is not located in a known mahinga kai area. The subject land has been used for farming purposes for many years. However, surveys in the various waterways across the site identified four species of fish including the upland bully, shortfin eel, longfin eel and brown trout. Invertebrate fauna, including koura, are expected to be present also although not surveyed. The proposed protection and enhancement of the waterways and their margins would maintain and likely improve the current freshwater ecological values of the land.

Ngā tūtohu whenua

652. There are no known wāhi tapu or wāhi taonga sites within the application site or close by.

Conclusion

653. It is considered that the proposal would not have an adverse impact on the cultural values of iwi as set out within IMP.

Te Rūnanga o Ngāi Tahu - Freshwater Policy

654. The provisions of the freshwater policy are consistent with the provisions in the IMP, albeit with a more specific focus on freshwater resources. For the avoidance of repetition, the reader is referred to the technical assessments concerned with freshwater resources and the assessment of the IMP above. It is concluded that the proposal is generally consistent with the Te Rūnanga o Ngāi Tahu - Freshwater Policy.

Greater Christchurch Spatial Plan

655. The GCSP constitutes a Future Development Strategy as defined in the NPS-UD. It identifies 'broad locations' in setting guidance and parameters for the identification and consideration for future growth direction. The GCSP does not identify the site as a location for future growth. However, the 'Areas to protect, avoid and enhance' section shows Ōhoka as a location with very few constraints (consistent with the constraint mapping included at **Appendix 37**).

656. The relevant overarching direction of the GCSP is to '*focus growth through targeted intensification in urban and town centres and along public transport corridors*'. Six opportunities are identified (each with a series of specific directions) and five key moves are stated. While some of these matters are not relevant here, the proposal is not inconsistent, or in direct conflict with any of the stated opportunities, key moves, or directions. The proposal is consistent with specific 'directions' in the GCSP and its spatial strategy in that:

- it is consistent with the direction to '*focus and incentivise growth in areas free from significant risks from natural hazards*' and is otherwise resilient to climate change and natural hazards,

- cultural or heritage values, significant natural values, the health and wellbeing of water bodies, strategic infrastructure and the freight network are not adversely affected,

- while the site contains a small area of LUC 2 soils, primary production will not be significantly impacted noting the loss of productive soils assessment included with this application,

- it will '*ensure at least sufficient development capacity is provided or planned for to meet demand*', '*provide housing choice and affordability*', and '*deliver thriving neighbourhoods with quality developments, quality housing and supporting infrastructure*', and

- it supports '*the network of green spaces*' and '*safe, attractive and connected opportunities for walking, cycling and other micro mobility*'.

657. The proposal is generally consistent with the GCSP desired pattern of growth for new residential development, where it states that broad locations for growth should, at a minimum:

- '*be adjacent to, near, or within a… Major Town*' – Ōhoka is near Rangiora, Kaiapoi and Christchurch which are major towns,

- '*be accessible to … Core Public Transport Routes*' - while Ōhoka is not currently serviced by public transport, park and ride facilities are situated in Rangiora and Kaiapoi,

- '*protect, restore and enhance the natural environment, historic heritage, and sites and areas of significance to Māori*', noting that the proposal would result in the enhancement of waterbodies and their margins while acknowledging that degraded wetlands would be removed,

- '*be free from significant risks arising from natural hazards and the effects of climate change*', noting the site is resilient to and free from these risks and effects, and

- '*be cognisant of the landscape and visual context, integrate with natural features and align with good urban design principles*', which is demonstrated in the landscape and urban design assessments that form part of the application.

658. The proposal also generally aligns with the desired attributes of new 'greenfield' areas, which the GCSP recognises '*will continue to be part of how we accommodate more people so that we can provide a range of lifestyle choices that our communities' value*'. In particular, the proposal:

- is '*integrated with existing urban areas*' as addressed by in the urban design assessment,

- meets identified needs for housing, as identified in the economic assessment, and

- is '*at the right scale, density and location to minimise impact on highly productive land and existing permitted or consented primary production activities*'.

659. Finally, the proposal is consistent with the mapped strategy and direction set out in the GCSP. This is reflected in maps 6-12 which identify the areas in Greater Christchurch to protect, avoid or mitigate, including: sites and areas of significance to Māori; areas subject to natural hazard risks (including moderate natural hazard risks); key strategic infrastructure; environmental areas and features; groundwater protection zones; and land use capability class 1-3 soils. The site is identified as being affected by liquefaction risk, which would be mitigated through infrastructure and building design, and LUC 2 and 3 soils, the loss of which has been assessed as acceptable and outweighed by the benefits of the proposal.

660. Accounting for the above assessment, the proposal is considered to be generally consistent with the strategic direction and desired pattern of growth in the GCSP, acknowledging its focus on intensification while recognising the continued need for greenfield growth in response to housing demands.

Waimakariri 2048 District Development Strategy

661. The DDS is intended to guide residential and business growth over the next 30 years. It acknowledges the district is fast growing in the New Zealand context and identifies the need for ongoing work needed to respond to the changing needs of the district, including ensuring there is variety in housing choice in well-functioning urban environments, and access to jobs in a thriving local economy.

662. The strategy was developed with community input expert advice / analysis and predates the NPS-UD.

663. In relation to the growth of the district's smaller settlements, the strategy states (at section 2.5) that they:

> *… have not experienced the same growth pressures as the District's larger centres. There have been 106 building consents issued for new houses in the period 2006 to 2016 for the Residential 3 Zone, with the majority of these in Waikuku (35), followed by The Pines Beach/Kairaki (30), then Ashley (17). Community feedback sought to limit further growth in these settlements to protect their unique character, and avoid natural hazard impacts for beach settlements. These comments reflect policies within the operative District Plan that seek to maintain the compact form of the settlements.*

664. The growth approach identified enables existing vacant areas in the small settlements to develop and provides for some further 'organic' expansion opportunities, generally consistent with historic growth rates. By focusing most new greenfield and intensification development in the district's larger towns, the character of the district's small settlements would generally be retained. This approach accords with the majority of feedback received

on small settlements and the constraints that apply to some of them. By focussing most new development outside of the small coastal settlements, the identified natural and cultural values in these settlements are protected and desired outcomes for the area achieved.

665. Consistent with the RPS and the GCSP, the DDS intends for urban growth to focus in and around the main towns. For this reason, the proposal does not accord with strategy.

666. The District Council's preference to restrict growth of the district's smaller settlements predates the DDS. In respect of Ōhoka, the now historic residential growth strategy, Directions for Residential Growth 1997-2016, states that:

> *Council does not favour Ōhoka (population 160) as one of the locations for further residential development because of the:*
>
> - *high water table which leads to drainage and effluent disposal difficulties*
> - *effect on the character of Ōhoka. The township has already experienced considerable development Further development has the potential to overwhelm the present small town characteristics or Ōhoka (refer Planning Tribunal 1994 Armstrong versus Waimakariri District Council)*
> - *need to upgrade the water supply and provide a reticulated sewerage system*
> - *no logical boundaries to limit further expansion*
> - *lineal form of the township along Mill Road which should not be extended.*

667. Balancing the objectives of the NPS-UD, the Applicant understands that any expansion of the Ōhoka settlement must address previously identified constraints and be carefully planned so that resulting development is sympathetic to the existing settlement.

668. Below is a response to the constraints listed in the Directions for Residential Growth 1997-2016 strategy:

> *high water table which leads to drainage and effluent disposal difficulties*

669. As per the infrastructure and stormwater assessments, stormwater can be managed within the site and effluent disposal would be reticulated to the Rangiora Wastewater Treatment Plant.

> *effect on the character of Ōhoka. The township has already experienced considerable development. Further development has the potential to overwhelm the present small town characteristics of Ōhoka*

670. While it is debateable whether the settlement has experienced "considerable development", there is potential for further development to overwhelm the character of Ōhoka if not carefully considered and planned. As per the urban design and landscape assessments, it is considered that the proposed development, while bringing change, would be delivered in a way that maintains the key characteristics of the existing settlement.

need to upgrade the water supply and provide a reticulated sewerage system

671. As per the infrastructure assessment, the development enabled by the proposal can be fully serviced.

no logical boundaries to limit further expansion

672. Taking into consideration the urban design and landscape assessments, development that would be enabled by the proposal would comprehensively complete the development of Ōhoka for the foreseeable future, negating the need for further expansion.

lineal form of the township along Mill Road which should not be extended.

673. The form of the proposed subdivision and development comprehensively addresses this previous concern. It ensures that the settlement radiates from an expanded village centre avoiding further lineal extensions.

Relevant Other Matters

Mitigation Measures and Monitoring

674. 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 points to the parts of the RMA relevant to setting conditions.

675. 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. A reference to a consent authority is read as a reference to a panel.

676. The conditions proposed as part of the application to address adverse effects or to address aspects of the subdivision approval for infrastructures design / vesting are attached in **Appendix 43** (district council consent conditions) and **Appendix 44** (regional council consent conditions). These include monitoring conditions that describe how and by whom effects would be monitored if the activity is approved.

Consideration of Alternatives

677. The preceding assessment of effects shows that the proposal would not have any significant adverse effects on the environment. Notwithstanding this conclusion, the assessment at paragraphs 351 to 353 provides the relevant consideration of alternatives accounting for development constraints and opportunities within the context of the statutory directions.

RMA Part 2 and Sections 106 & 106A

Part 2

678. Part 2 of the RMA sets out its purpose and principles which are to promote the sustainable management of natural and physical resources. Section 5 sets out the purpose as follows:

> *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 wellbeing 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.*

679. When assessing the application, the Act requires the panel to take into account the purpose of the RMA as well as sections 6 and 7.

680. Section 6 sets out matters of national importance which must be recognised and provided for. Subclauses (a), (d) and (f) are relevant to this application and are set out and assessed in turn below.

> *(a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:*

681. The proposal would result in the permanent loss of some natural inland wetlands within the site and therefore engages section 6(a) directly. The wetlands proposed to be removed are generally small, fragmented, highly modified by long-term agricultural use, and of low ecological value. They do not include natural springheads, nor do they comprise intact wetland systems with high natural character values.

682. The proposal retains and enhances the waterbodies and wetland features with the highest natural character values and protects them through riparian buffers, restoration planting, removal of farm culverts, and re-establishment of more natural channel form and function. Public access along these waterways is also enhanced.

683. Section 6(a) places strong emphasis on preservation. In this instance, the proposal recognises the importance of natural character by prioritising the retention and enhancement of higher-value features and by improving the overall quality, legibility, and resilience of the freshwater network across the site. Residual impacts on wetland extent remain, but they are localised and mitigated through restoration and creation of wetland environments elsewhere on the site.

> *(d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers*

684. The proposal significantly enhances public access to rivers and their margins. Continuous esplanade and recreation reserves are proposed along the Ōhoka Tributary, the South Ōhoka Branch, and associated spring-fed waterways. These corridors provide for walking and cycling access, visual connection to water, and integration of open space with the wider settlement.

685. At present, access to waterways within the site is limited and largely private, with margins degraded by agricultural use. The proposal would convert these corridors into publicly accessible, ecologically enhanced spaces, thereby achieving a net improvement in public access and amenity consistent with section 6(d).

(f) the protection of historic heritage from inappropriate subdivision, use, and development

686. The site contains a recorded archaeological site associated with the former Ōhoka Railway Station. The proposal impacts this site and accordingly engages section 6(f). The archaeological assessment identifies that the proposal would have a substantial impact on the railway station site in archaeological terms.

687. However, the proposal provides for protection and mitigation through the implementation of an archaeology management plan, including detailed investigation, recording, and the retention of selected physical elements. These measures ensure that heritage values are appropriately recognised and documented prior to modification.

688. With the proposed safeguards in place, the impacts on historic heritage are considered acceptable.

689. Section 7 requires particular regard to be had to 'other matters.' Of relevance to this application are:

(b) the efficient use and development of natural and physical resources;

(c) the maintenance and enhancement of amenity values; and

(f) maintenance and enhancement of the quality of the environment;

690. The proposal is considered to be an efficient use of the land resource as it provides for the expansion of an existing settlement in a sympathetic manner to meet strong demand for residential living at Ōhoka.

691. Amenity values would be maintained and enhanced. As assessed previously, while the character of the site would change and become less open, the village would maintain a rural-like aesthetic through careful design.

692. Environmental quality would be enhanced in respect of ecology and through large scale landscaping. More generally, the proposal would deliver a high-quality village environment.

693. The preceding assessment demonstrates that the proposal achieves the purpose of the RMA.

Section 106

694. On the basis of the geotechnical assessment (**Appendix 18**) and flood hazard assessment (**Appendix 22**), the site is not likely to be subject to any significant hazards – see section 106(1)(a). Further sufficient provision is made for legal and physical access to all allotments in accordance with section 106(1)(c).

Section 106A

695. The area of the site that is proposed to accommodate residential activities is subject to the flood assessment area, but not within a high hazard area. The geotechnical investigation determined that the site was not susceptible to earthquake, liquefaction damage or land instability, and that the land can be considered to be TC-1 equivalent.

696. On the basis of the geotechnical and flooding assessments, the proposed subdivision and development:

- is not likely to be subject to any significant hazards, individually or in combination,
- would not result in a significant extent of materially damaged by natural hazards; and
- would not result in adverse effects on the health or safety of people.

697. For these reasons, the proposal is assessed as being in accordance with section 106A.

Wildlife Approval

698. As set out previously, a wildlife approval is sought pursuant to section 42(4)(h) of the Act for the capture, handling and relocating of native lizards, should it be required during the construction phase of the project.

699. From preliminary site visits and desk top studies in late 2024, the development site was identified as containing potential lizard habitat. The findings of the initial habitat assessment indicated a moderate likelihood that lizards would be encountered within the site. As recommended in the lizard habitat assessment, PDP herpetologists conducted baseline lizard surveys in March and April 2025. The memorandum at **Appendix 24** provides the methodology and results of the surveys which confirmed the presence of native lizards and thus the need for a wildlife approval.

700. Schedule 7 (clause 2) sets out the information requirements for wildlife approval. Clause 5 of that schedule sets out the assessment. The information and assessments contained in **Appendix 24** are provided in accordance with these requirements.

701. PDP has prepared a lizard management plan specific to the proposal which is included at **Appendix 24**. It 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 herpetologists' recommendations and the lizard management plan would ensure that effects on native lizards are appropriately mitigated. Conditions are proposed (**Appendix 45**) which would ensure the project is carried out in accordance with the lizard management plan.

702. The Applicant has consulted with DOC, as the relevant administrating agency of the Wildlife Act, in relation to the wildlife approval sought in this application. The DOC feedback is included at **Appendix 5** along with a response from PDP.

Archaeology Authority

703. As set out previously, an archaeological authority is sought pursuant to section 42(4)(i) of the Act. The project will result in the destruction of most of the Ōhoka Railway Station archaeological site and there may be other archaeological sites that would be encountered within the project area.

704. Clause 2 of Schedule 8 of the Act sets out the information requirements for an archaeological authority and clause 4 sets out the assessment criteria. The required information and assessment are provided in the UOA assessment (**Appendix 12**). It satisfies the information requirements by providing a clear description of the proposed activity, identifying affected archaeological sites and values, and providing an assessment of effects on archaeological values. The assessment satisfies clause 4 given it applies a clear avoid–minimise–mitigate hierarchy, specifies detailed mitigation and management measures, and establishes monitoring, reporting, and implementation mechanisms.

705. UOA has prepared an archaeological management plan specific to the proposal which is included at **Appendix 12**. It provides full details for the required monitoring and reporting in relation to the project. Adherence to the archaeological management plan would ensure that effects on historic heritage are appropriately mitigated. Conditions are proposed (**Appendix 46**) which would ensure the project is carried out in accordance with the archaeological management plan.

706. The Applicant has consulted with Heritage NZ, as the relevant administrating agency of the Heritage NZ Act, in relation to the archaeological authority sought in this application. The Heritage NZ feedback is included at **Appendix 7**.

707. Evidence of the current landowner's consent is not included as part of this application (refer Schedule 8, clause 2(1)(c)) as the authority sought through this application would not be exercised until ownership of the land has transferred to the Applicant. n.

Section 85(3) Assessment

708. 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 section 85(1), this application could only be declined if it would result in sufficiently significant 'adverse impacts' that are out of proportion to the regional or national benefits of the project (see section 85(3)[25]. As per section 85(5) of the Act, an adverse impact means any matter considered by the panel (as per section 81(2)) that weighs against granting the approval. These matters include adverse environmental effects and inconsistency with planning documents, among other matters.

709. The Act expressly anticipates that some Fast-track projects may involve activities that the planning documents would not normally allow – that is, the Act allows consideration of prohibited activities and other activities that would normally require a decision maker to decline an application for resource consent – and provides the panel with discretion to consider them on their merits.

710. The key question for the panel is therefore not whether the proposal aligns well with the planning documents, but whether the adverse impacts are so significant or disproportionate that they outweigh the project's benefits.

711. Policy consistency remains relevant under the Act, but section 85(4) confirms that an adverse impact cannot meet the section 85(3)(b) threshold solely because it is inconsistent with or contrary to a provision of a specified Act or any other document the Panel must take into account under section 81(2). Accordingly, any policy misalignment is relevant only to the extent it reflects, or is supported by, a demonstrable and sufficiently significant adverse impact (after consideration of the effect of conditions).

712. The provisions of planning documents assessment (**Appendix 42**) identifies several policy tensions as briefly summarised below.

- Urban form: the proposal diverges from the planned urban form of the district and Greater Christchurch sub-region as articulated in the RPS and district plans.

- Wetland loss: the proposal includes loss of wetlands despite clear avoid directives in NPS-FM and LWRP.

- Infrastructure: the proposed development is not aligned with planned infrastructure programmes.

- Transport sustainability: the proposal would likely increase car dependency and increased GHG emissions vs policies promoting mode shift and compact urban form.

- Heritage protection: the loss of the Ōhoka Railway Station archaeological feature conflicts with heritage protection policies.

[25] The project does not otherwise involve activities which would require refusal as referenced in section 85(1).

713. While it is acknowledged that the proposal gives rise to a clear policy tensions, section 85(4) confirms that policy inconsistency alone cannot elevate an effect to the section 85(3)(b) threshold, and the adverse effects in respect of these matters are assessed as being no more than minor with the exception of urban form related effects. The preceding assessment recognises urban form adverse impacts as having the greatest potential to meet the level of significance under section 85(3)(b).

714. For the avoidance of doubt, none of the remaining adverse impacts associated with the proposal are considered to be of a scale or nature that would weigh materially against granting approval.

Urban Form

Adverse Impacts

715. The urban form policy framework in the RPS (particularly Chapter 6) and Waimakariri planning documents contain strong preferences for consolidated growth within identified urban areas and greenfield priority areas. The proposal represents a departure from that planned pattern, as it would expand the Ōhoka settlement beyond areas earmarked for growth in regional strategy. That departure is properly characterised as policy tension, but – consistent with section 85(4) the relevant question is whether the underlying effects associated with that departure (including character, productive soils and transport outcomes) are sufficiently significant, after conditions, to be out of proportion to the project's regional or national benefits.

716. Aside from the policy tension, the proposed urbanisation of the site would:

- impact on the existing character of the area,
- result in the loss of productive soils, and
- increase traffic in the road network in the vicinity.

717. In terms of character, the potential adverse effects are mitigated by the proposed landscape treatment. This emulates the existing form of the Ōhoka settlement by including the proposed commercial aspects within the 'core' and screening most of the residential development from view. Further, the proposal is a contiguous extension immediately adjacent existing residential zones, is a comprehensive master-planned extension, rather than piecemeal sprawl.

718. While loss of productive soils would generate adverse effects, this would likely occur even if the project was refused because rural lifestyle development is the highest and best use of the land (as currently zoned) rather than the existing dairy farm.

719. The proposal would increase vehicle use and dependency, particularly because Ōhoka is not currently served by public transport. However:

- modelling shows the impact of additional traffic is dispersed across multiple rural collector and arterial roads,

- the development is closer to Christchurch than many existing rural residential enclaves, with travel times similar to Kaiapoi, Mandeville, West Eyreton, and Fernside,

- the design of the subdivision creates a walkable local centre, reducing short-trip vehicle use, and

- park-and-ride provides public transport options and future bus stop provision enables public transport to be integrated in Ōhoka if that is desired.

720. The adverse transport-related urban form effects are moderate and manageable.

721. Overall, these potential adverse urban form related effects have been assessed being more than minor but not significant. Accordingly, they do not necessitate an assessment under section 85(3). If, however, the Panel reaches a different view, the following assessment is provided in the alternative.

Weighing Adverse Impacts Against Benefits

722. The Act expressly anticipates that Fast-track projects may involve departures from policy direction, including strategic growth frameworks, and requires weight to be given to such matters to be assessed through a proportionality lens rather than treated as determinative.

723. In this case, the urban form effects are localised to Ōhoka and its immediate surrounds. The proposal does not undermine the hierarchy or functioning of the district's main urban centres, nor does it compromise the role of Rangiora, Kaiapoi, or Christchurch as focal points for higher-order employment and services. The scale and form of development have been designed as a contiguous, master-planned extension of an existing settlement, rather than ad-hoc or fragmented sprawl.

724. While the proposal would result in a substantial change from a rural to an urban environment, the associated adverse effects have been found to be more than minor but not significant. These effects are mitigated through urban design and landscape responses, the provision of a walkable village structure, consolidation of development around an expanded local centre, and the integration of extensive open space and waterway corridors.

725. The Market Economics economic assessment of the project (**Appendix 2**) concludes that the benefits of the project include the delivery of approximately 879 new residential allotments and a retirement village, providing a scale of housing supply that materially contributes to meeting district and sub-regional demand – particularly demand that is demonstrably location-specific to Ōhoka and not readily substitutable by housing in the district's main urban centres. The proposal also delivers environmental enhancement and a local centre that improves self-sufficiency, reduces short-trip vehicle travel, and improves day-to-day accessibility for both existing and future residents. The project further delivers substantial economic benefits, including a significant an estimated $400 million contribution to the contribution to regional GDP, sustained construction employment, and the long-term establishment of local jobs and services.

726. In addition, the proposal achieves positive environmental outcomes in other respects, including reduced agricultural discharges to freshwater, long-term enhancement of waterway corridors, and improved public access to open space. The assessment by Savvy Consulting (**Appendix 39**) assesses the economic costs of the proposed development. Overall, Savvy concludes that the actual and potential economic costs and disbenefits of the proposed development range from less than minor to minor when assessed at the relevant spatial extents.

727. When assessed in this broader context, the urban form-related adverse impacts do not outweigh the benefits of the project. Nor do they rise to a level that could be characterised as out of proportion to those benefits, as contemplated by section 85(3) of the Act.

Section 85(3) Conclusion

728. The application identifies no adverse impacts that are sufficiently significant to be out of proportion to the project's regional or national benefits.

Conclusion

729. This application seeks approval under the Act for a comprehensive and master-planned expansion of the Ōhoka settlement. The proposal represents a significant development opportunity, delivering substantial regional and local benefits through the provision of housing supply and choice, a well-functioning village centre, retirement living, employment generation, and significant environmental and recreational enhancements, particularly in respect of freshwater systems and open space networks.

730. The assessment confirms that the proposal will result in several adverse effects. The most notable of these relate to urban form, given the location of the proposal outside identified growth areas. Construction-related effects would also be experienced over an extended staging period. These effects are acknowledged and have been robustly assessed.

731. Importantly, however, the evidence demonstrates that these adverse effects are either less than minor, or more than minor but capable of being appropriately avoided, remedied, or mitigated through the proposed design, management measures, infrastructure upgrades, and comprehensive suite of consent conditions. In several respects, the proposal delivers positive environmental outcomes relative to the existing baseline, including improvements in water quality, ecological function, and public access to natural systems.

732. The proposal is supported by detailed technical assessments that confirm that the site can be appropriately serviced and that key risks – particularly in respect of flooding, infrastructure capacity, groundwater, and ecological values – can be effectively managed. The development has been carefully designed to respond to site constraints, integrate with the existing settlement, and deliver a high-quality urban environment.

733. While the proposal gives rise to policy tension, particularly in relation to the location and sequencing of urban growth and wetland loss, those inconsistencies do not, in the context of the Act, determine the outcome of the application. Rather, they form part of the overall assessment of adverse impacts to be weighed against the project's significant benefits.

734. Having regard to the purpose and decision-making framework of the Act – particularly the proportionality test under section 85(3) – it is concluded that the adverse impacts of the proposal are not sufficiently significant to be out of proportion to the substantial and enduring regional and local benefits that would be realised.

735. Accordingly, the application satisfies the statutory test for approval under the Act and should be granted, subject to appropriate conditions.

Appendix 1

Authorised Persons Statement

Appendix 2

Economic Benefits Assessment

Appendix 3

Record of Consultation with Canterbury Regional Council

Appendix 4

Record of Consultation with Waimakariri District Council

Appendix 5

Record of Consultation with the Department of Conservation

Appendix 6

Record of Consultation with Te Ngāi Tūāhuriri Rūnanga

Appendix 7

Record of Consultation with Heritage New Zealand

Appendix 8

Letter from Transpower

Appendix 9

Confirmation of Existing Consents

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Adjacent Property Details

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Record of Title

Appendix 12

Archaeological Assessment

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Detailed Site Investigation and Supplementary

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Infrastructure Assessment

Appendix 15

Integrated Transport Assessment

Appendix 16

Assessment of Potential Loss of Productive Land

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Groundwater and Water Supply Assessment

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Geotechnical Assessment

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Aquatic Ecology Assessment and Addendum

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Hydrology Assessment

Appendix 21

Wetland Assessment

Appendix 22

Flooding Assessment

Appendix 23

Landscape and Visual Impact & Urban Design Assessment

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Lizard Assessment

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Avifauna Survey Memo

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Subdivision Scheme Plans

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Civil Engineering Plans

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Wastewater Assessment

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Water Supply Strategy

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Site Management Plan

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Stormwater Management Report

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Waimakariri District Plan Compliance Assessment

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Partailly Operative Waimakariri District Plan Compliance Assessment

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Canterbury Land and Water Regional Plan Compliance Assessment

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Development Constraints Maps

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Greenhouse Gas Emissions Assessment

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Economic Costs Assessment

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Proposed Plan Evidence of Carl Davidson

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Proposed Plan Evidence of Chris Jones

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Provisions Assessment

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Proposed District Council Consent Conditions

Appendix 44

Proposed Regional Council Consent Conditions

Appendix 45

Proposed Wildlife Approval Conditions

Appendix 46

Proposed Archaeology Authority Conditions

Appendix 47

Watercourse and Wetland Changes Plans

Appendix 48

Statement of Experience

Jeremy Phillips, Director and Senior Planner

Jeremy Phillips is a Director and Senior Planner at Novo Group Limited in Christchurch, a company specialising in resource management planning, traffic engineering, and landscape consulting. Novo Group provides resource management advice to local authorities and private clients.

Jeremy holds a Bachelor of Science from the University of Canterbury and a Master of Science with Honours in Resource Management from Lincoln University, which he attained in 2001. He is an intermediate member of the New Zealand Planning Institute and a member of the Institute of Directors. Since January 2010, Jeremy has been accredited as a Hearings Commissioner under the MfE Making Good Decisions programme and has held an endorsement as a Chair since January 2013.

With 23 years of experience as a resource management planner, Jeremy has worked within and for territorial authorities, as a consultant, and as an independent Hearings Commissioner. He has extensive experience in urban land use development planning in Greater Christchurch, primarily as a consultant to property owners, investors, and developers. Jeremy has prepared resource consent and private plan change requests for clients and has appeared as an expert planning witness before Independent Hearings Panels and the Environment Court on numerous occasions. His experience includes providing extensive evidence on the Christchurch District Plan and its iterations over the past 20 years.

Tim Walsh – Consultant Planner

Tim Walsh is a consultant planner at Novo Group.

Tim holds a Bachelor of Science with Honours and a Master of Science both from the University of Canterbury. He is an associate member of the New Zealand Planning Institute and a member of the Resource Management Law Association. Since October 2023, Tim has been accredited as a Hearings Commissioner under the MfE Making Good Decisions programme.

Tim has 20 years of experience as a resource management planner working in local and central government as well as in private practise. He possesses substantial experience in all forms resource management planning. He is proficient in the preparation of resource consent applications for development projects and plan change requests including the presentation of evidence at local authority and Environment Court hearings.

Tim is familiar with the application site at Ōhoka having visited it on several occasions. He was involved in private plan change 31 to rezone the site under the OWDP and the Applicant's submission to rezone the land in the Proposed Plan process.

Pia Jackson – Resource Management Planner

Pia Jackson is a Resource Management Planner employed by Inovo Projects, a multi-disciplinary development consultancy providing engineering, surveying, project management, and resource management planning services.

Pia holds a Bachelor of Arts / Bachelor of Laws (BA/LLB) conjoint degree from the University of Auckland, and a Master of Social Science (Planning) from the Royal Melbourne Institute of Technology (RMIT). Pia is an Intermediate Member of the New Zealand Planning Institute.

Pia has approximately 13 years' experience working as a planner, as a consultant in Australia and New Zealand. Pia's experience covers a wide range of resource management planning matters, with a particular focus on residential development and subdivision, including both district and regional consenting matters.

Pia is familiar with the application site.