
Under	the Fast-track Approvals Act 2024
In the matter of	the substantive application for the Ōhoka Residential Subdivision project
Between	Carter Group Limited
	Applicant

**MEMORANDUM OF COUNSEL FOR CARTER GROUP LIMITED
REGARDING THE ASSESSMENT OF EFFECTS UNDER SCHEDULE 5, CL
7(A) OF THE FTAA**

Date: 12 August 2026

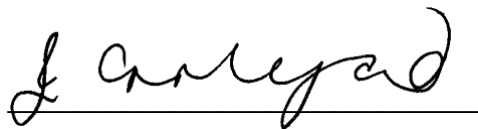
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May it please the Panel Convener:

- 1 This memorandum of counsel is filed on behalf of Carter Group Limited (**Carter Group**), the applicant for the Ōhoka Residential Subdivision project (**Project**).
- 2 Following the Panel Convener's Conference on 17 August 2026, the Panel Convener (**Convener**) has requested:

the relevant page reference(s) in the lodged application that relate to the assessment of effects under Schedule 5, cl 7(a) of the FTAA.
- 3 Carter Group understands that specifically what is sought is where "any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects" is dealt with in the AEE.
- 4 For context in answering the question, we attach as **Appendix 1**, the section 274 notices of the Ōhoka Residents Association (**ORA**) and the Ōhoka Community Board (**OCB**) filed in the Environment Court proceedings relating to the rezoning of the land to which the Project relates (**Section 274 Notices**). The Section 274 Notices raise those effects which are of interest to the ORA and the OCB.
- 5 Mr Walsh has prepared **Appendix 2** which sets out where the matters raised by Schedule 5, cl 7(a) are dealt with in the Assessment of Environmental Effects (**AEE**). The matters dealt with in the AEE which effect the people in the neighbourhood and the wider community were also informed by the matters raised in the Section 274 Notices.
- 6 The Convener's attention is also drawn to the sections of the respective Section 274 Notices, which confirm that neither party is willing to participate in mediation or other alternative dispute resolution in respect of the issues in the Environment Court, which are also issues in the Project.

Dated this 18th day of August 2026



Jo Appleyard / Meg Davidson
Counsel for Carter Group Limited

APPENDIX 1 – SECTION 274 NOTICES

**IN THE ENVIRONMENT COURT OF NEW ZEALAND
CHRISTCHURCH REGISTRY**

**I TE KŌTI TAIAO O AOTEAROA
ŌTAUTAHU ROHE**

ENV-2025-CHC-000064

UNDER the Resource Management Act 1991 (RMA)

IN THE MATTER of an appeal under clause 14 of Schedule 1 of the
Resource Management Act 1991

BETWEEN **ROLLESTON INDUSTRIAL DEVELOPMENTS LIMITED**
CARTER GROUP PROPERTY LIMITED
Appellants

AND **WAIMAKARIRI DISTRICT COUNCIL**
Respondent

**NOTICE OF OHOKA RESIDENTS ASSOCIATION INCORPORATED'S WISH
TO BE PARTY TO PROCEEDINGS
12 September 2025**

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WYNN WILLIAMS

Solicitor: P A C Maw / K H Woods
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NOTICE OF PERSON'S WISH TO BE PARTY TO PROCEEDINGS

Section 274, Resource Management Act 1991

To The Registrar
Environment Court
Christchurch

Name of Person who wishes to be Party

- 1 Ohoka Residents Association Incorporated (**ORA**) wishes to be a party to the following proceedings: ENV-2025-CHC-000064, an appeal by Rolleston Industrial Developments Limited (**RIDL**) and Carter Group Property Limited (**CGPL**) (together, the **Appellants**) against parts of the decision of the Independent Hearings Panel (**Panel**) adopted by the Waimakariri District Council (**Council**) on the proposed Waimakariri District Plan (**pWDP**) (the **Decision**).
- 2 ORA says that it is a person who made a further submission on the subject matter of the proceedings (a copy of this further submission is attached as **Annexure 1**).

Trade competition

- 3 ORA is not a trade competitor for the purposes of section 308C or 308CA of the Resource Management Act 1991 (**RMA**).

The Proceedings

- 4 ORA is interested in all the proceedings.

Particular Issues

- 5 Without limiting the above, ORA is interested in the following particular issues:
 - (a) The effect of rezoning the land identified by the Appellants¹ (**Land**) from Rural Lifestyle Zone to a Settlement Zone or a General Residential Zone (**proposed rezoning**) on the rural village

¹ Notice of appeal by Rolleston Industrial Developments Limited and Carter Group Property Limited against Waimakariri District Council's decision on the proposed Waimakariri District Plan dated 22 August 2025 at [8.1].

character of Ōhoka, Ōhoka's consolidated urban form and the differentiation between Mandeville and Ōhoka.

- (b) The effect of the proposed rezoning on the productive nature of the Land and the loss of agricultural production and versatile soils from the Land.
- (c) The effect of the proposed rezoning on groundwater interception, stormwater management and flooding risk (including matters relating to flood modelling).
- (d) Whether the proposed rezoning implements the relevant policies in the pWDP.
- (e) Whether the proposed rezoning gives effect to the Canterbury Regional Policy Statement (**CRPS**), particularly Chapter 6.
- (f) Whether the proposed rezoning gives effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**), particularly:
 - (i) Whether the proposed rezoning contributes to a well-functioning urban environment under Policy 1 of the NPS-UD;
 - (ii) Whether the proposed rezoning meets the requirements of Policy 8 of the NPS-UD; and
 - (iii) Whether the proposed rezoning is sufficiently near a centre, is well-served by existing or planned public transport and there is high demand for housing or for business in the area under Objective 3 of the NPS-UD.
- (g) Whether the objectives of the proposed rezoning are consistent with the purpose and principles of the RMA set out in Part 2 of the RMA.
- (h) Whether the proposed rezoning is an efficient or effective way to achieve the objectives of the pWDP under section 32 of the RMA or otherwise are the most appropriate way to achieve the objectives of the pWDP and the purpose of the RMA under section 32 of the RMA.

Relief sought

- 6 ORA opposes the relief sought by the Appellants at paragraph 22 of the Notice of Appeal dated 22 August 2025 and seeks that the parts of the Decision under appeal are upheld, because:
- (a) the Decision correctly identified that it had not been demonstrated that there was a specific demand for housing in this particular location of the District, nor that the NPS-UD requires that a council must provide housing at this level of granularity;
 - (b) the Decision correctly identified that the development proposed by the Appellants would be incongruous with the existing Ōhoka settlement and the surrounding area;
 - (c) the Decision correctly identified that the development proposed by the Appellants is not well-connected or accessible in respect of the rest of the District/Region, that future residents would likely be mostly reliant on private vehicles (even with the offered bus service) and that the area is not accessible to other urban areas by bicycle;
 - (d) the Decision correctly found that the reliance on private vehicles is not consistent with the NPS-UD in respect of supporting reductions in greenhouse gas emissions;
 - (e) in relation to Policy 8 of the NPS-UD:
 - (i) the Decision correctly identified the considerable uncertainty about whether the State Highway upgrade required is feasible and if/when those works (along with other roading upgrades necessary) may be funded and undertaken and that this raised questions as to whether the development (and the outcomes promised by the submitters) can be realised;
 - (ii) the Decision correctly found that sufficient development capacity is provided in the short, medium and long term, and that there is no shortfall arising that would provide a strong impetus for this requested rezoning to be considered more favourably;

- (f) the Decision correctly found that the proposed rezoning would not contribute to well-functioning urban environments and would not give effect to the NPS-UD; and
- (g) the Decision gave appropriate regard to the CRPS and the pWDP's proposed objectives and policies in respect to urban growth and development and correctly found that the proposed rezoning would not give effect to these.

7 Further, ORA opposes the relief sought by the Appellants because:

- (a) it would not achieve the sustainable management purpose of the RMA;
- (b) it would not provide for the efficient use and development of natural and physical resources;
- (c) it would not result in the most appropriate plan provisions in terms of section 32 of the RMA; and
- (d) it is contrary to best resource management practice.

Dispute resolution

8 ORA does not agree to participate in mediation or other alternative dispute resolution of the proceedings.



P A C Maw / K H Woods

Solicitor for Ohoka Residents Association Incorporated

Date: 12 September 2025

Address for service of Ohoka Residents Association Incorporated

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DEVELOPMENT PLANNING

Further Submission Form

Further submissions close on Monday, 21 November 2022 at 5pm.

I/we are further submitting on:

Proposed District Plan

Variation 1: Housing Intensification

Variation 2: Financial Contributions

Please use a separate form for each consultation.

Clause 8 of Schedule 1, Resource Management Act 1991

To: Waimakariri District Council

Further submitter details

Name of further submitter: _____

Organisation name and contact (if representing a group or organisation): _____

Postal address/Address for service: _____ Postcode: _____

Email: _____ Phone: _____

Only certain persons can make a further submission. Please select the option that applies to you.

I am:

a person representing a relevant aspect of the public interest

a person who has an interest in the proposal that is greater than the interest the general public has

the local authority for the relevant area

Please explain why you come within the category selected above:

Hearing options

I wish to be heard in support of my further submission? Yes No

If others make a similar further submission I will consider presenting a joint case with them at a hearing. Yes No

Signature: _____ Date: _____

(of person making submission or person authorised to make decision on behalf)

PLEASE NOTE - A signature is not required if you submit this form electronically. By entering your name in the box below you are giving your authority for this application to proceed.

Name of person making further submission: _____

This further submission is in relation to the <u>original submission</u> of: <i>Enter the details of the original submitter:</i> • name, address or email; and • submission number (and point(s), if applicable)	The particular parts of the original submission I/we support /oppose are:	My/our position on the original submission is: <i>Support or oppose</i>	The reasons for my/our support/ opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details of why you wish to allow/disallow (in full or in part) to indicate the decision you want Council to make

Name of person making further submission: _____

This further submission is in relation to the <u>original submission</u> of: <i>Enter the details of the original submitter:</i> • name, address or email; and • submission number (and point(s), if applicable)	The particular parts of the original submission I/we support /oppose are:	My/our position on the original submission is: <i>Support or oppose</i>	The reasons for my/our support/ opposition to the original submission are:	Allow or disallow the original submission (in full or in part)	Give precise details of why you wish to allow/disallow (in full or in part) to indicate the decision you want Council to make

Note

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the Waimakariri District Council. Contact details for all submitters can be found on the Waimakariri District Council website, at waimakariri.govt.nz/planning/district-plan.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy Act 1993

Please note information on this form and the content of your submission will be made publicly available as part of the decision-making process.

This form is in the format required by Form 6 of the Resource Management (Forms, Fees and Procedure) Regulations 2003.

Further submissions close on Monday, 21 November 2022 at 5pm.

Returning this form

You can:

- Email it to: developmentplanning@wmk.govt.nz - Subject line: Further Submission
- Post it to: Waimakariri District Council, Private Bag 1005, Rangiora 7440
- Deliver it to a Council Service Centre in Rangiora, Kaiapoi or Oxford

**Resource Management (Forms, Fees, and Procedure) Regulations 2003
(as at 03 March 2015)**

Form 33

Notice of person's wish to be party to proceedings

Section 274, Resource Management Act 1991

To the Registrar
Environment Court
Auckland, Wellington, and Christchurch

The Oxford-Ohoka Community Board (**OOCB**) wishes to be a party to the following proceedings: ENV-2025-CHC-000064, an appeal by Rolleston Industrial Developments Limited (RIDL) and Carter Group Property Limited (CGPL) (together, the Appellants) against parts of the decision of the Independent Hearings Panel (Panel) adopted by the Waimakariri District Council (Council) on the proposed Waimakariri District Plan (the Decision).

The **OOCB** is a person who made a further submission on the subject matter of the proceedings.

The **OOCB** is not a trade competitor for the purposes of Section 308C or 308CA of the Resource Management Act 1991 (RMA).

The **OOCB** is interested in all the proceedings.

Without limiting the above, the **OOCB** is interested in the following particular issues:

- a. Drainage, Stormwater and Flooding:
 - (i) The view of the **OOCB** is that local drains already reach peak capacity during high rainfall events. Adding more surface water from impervious surfaces, if the development proceeds, would push local drainage beyond capacity.
 - (ii) Locals have limited confidence that the proposed stormwater system, particularly the proposed Stormwater Management Areas (SMAs), will work in practice. The high groundwater levels throughout Ohoka can be as high as just 140mm below the surface, which means that holes and depressions in the ground often fill before any additional surface water is added.
 - (iii) It is unclear to what extent the flooding that occurred in 2014, or more recent events in 2021 and 2022, have been taken into account. Such events appear likely to occur more frequently and with, potentially, greater intensity as a result of climate change. The development will focus on 'shifting' the impacts of flooding further downstream (through raising floor/ground levels similar to Silverstream), which is considered by the **OOCB** to be a real one, and such effects do not appear to have been sufficiently addressed.

- (iv) There is also concern, given the high water table, that the compaction of the land by subdivision will also impede subsurface flows.
 - (v) The impacts on drainage, stormwater flows, build-up and transfer, leading to flooding at Ohoka and further downstream, is probably the number one concern expressed by local residents.
- b. Water Supply
 - (i) It is understood that, while there may be limited effects on the current water supply, though, of course, that is yet to be thoroughly tested, the water supply from the proposed development is not intended to be integrated with the remaining Ohoka water supply.
- c. The proposal to deal with wastewater
 - (i) The **OOCB** is aware that constraints on the route for any new pipe to increase capacity could lead to additional costs, not to mention the likely inconvenience and impacts on roads and berms during construction.
 - (ii) Using the Rangiora Wastewater Plant to treat effluent from the proposed development must also logically utilise capacity that might otherwise be available closer to Rangiora, in more sensible locations for growth. This suggests that such a development at Ohoka would result in an opportunity cost for development elsewhere.
- d. The Power Grid
 - (i) The **OOCB** is unaware of any consideration having been given to bolstering the security of the electricity supply that would seem to be inevitably impacted by such intensification.
- e. Local Roads and Transport generally
 - (i) The potential impacts on the local roads are another critical concern for Ohoka locals.
 - (ii) There are already traffic issues experienced with commuter traffic within the District and inevitably to Christchurch from Ohoka. In addition, a significant percentage of middle and high school-aged children are also schooled in Christchurch.
 - (iii) There is no current or planned public transport route to or through Ohoka to further afield. The bus to Oxford through Tram Road has been discontinued, and, according to advice from Environment Canterbury, appears unlikely to be reinstated in the near to medium future. There are school buses for Kaiapoi and Rangiora High Schools; however, these cater for a relatively small proportion of the total number of students and certainly do not go as far afield as Christchurch.

- (iv) The effects on transport will also be impacted by the increase in intensity on account of the changing traffic environment and the impacts on local roads. These roads, which often currently boast wide grassed berms or are constrained by drainage ditches and power poles, are expected to change, at least in closer proximity to the proposed development.
- f. The Amenity and 'feel' of Ohoka
 - (i) Those roads do contribute to the feel and amenity of Ohoka. The very same grassed berm roads that are exemplified as contributing to the rural character of Ohoka are elsewhere in the application proposed to be widened due to the need to accommodate increased traffic. It is understood that amenity may be a lesser consideration in areas identified for urban intensification under the NPS-UD. But it seems to be drawing a long bow to suggest that the amenity of a rural village such as Ohoka, which has been identified as a feature and made the subject of efforts for protection, should be ignored in the assessment of whether this is an appropriate place for such intensification in the first place.
 - (ii) It is evident that Ohoka and its village 'feel' is something worthy of some protection. It provides a sense of place and is why many locals call Ohoka home. It is desirable to provide for a variety of housing typologies in the district, and infringement of urban-sized sections in the rural lifestyle zone diminishes this choice. Such a provision could be made more appropriately in an established urban area.
 - (iii) Ohoka is a place that still has some scope for development at a scale that will enable the values that have drawn people here to be maintained. The **OOCB** would like the essence of Ohoka to be something that people will continue to enjoy in the future.
- g. Impacts on Local Schools
 - (i) While, as noted, a significant number of high school-aged student residents study in Christchurch, the local primary school serves a good-sized local zone in which land sits at the centre. Pressure will inevitably increase on Ohoka School, and it is unclear if the Ministry of Education has been consulted or has plans to expand the school if the development is approved.
 - (ii) A new school might be preferable in such a circumstance so that, again, the feel of the local school as a rural school servicing a broad range of locals is something they value and would prefer not to lose.
- h. Potential reverse sensitivity effects on rural community members
 - (i) The potential for reverse sensitivity impacts is likely to increase given the more intensive development and, consequently, more receptors in the middle of rural land. The potential impacts on lifestyle block activities and farmers having to change their practices due to nuisance complaints from new residents with urban expectations, who are unaccustomed to the noises and smells of the rural zone, should not be underestimated. Conversely, established rural residential and

lifestyle block owners will also likely be impacted by the reverse sensitivity of urban activity, noise and light from development's residents.

- (ii) The **OOCB**, consistent with the views of locals, considers that there are several already identified and, in some cases, already planned for areas in which such development could be better accommodated and integrated, will be better serviced by public transport and efficient transport networks, will have access to urban scale services, and with little need for disruption or significant levels of uncertainty about the ability to deliver what's being considered.
 - (iii) Those areas around Rangiora, Kaiapoi, and Woodend/Pegasus should be developed and extended as planned. They are already approaching the scale of development that will see the labour force stay more local and reduce commuter traffic. In addition, they can be provided with interconnected public transportation and cycleways, which can also help reduce the commuter load.
- i. Impacts on Ohoka Heritage
 - (i) Ohoka has a long history and some heritage sites. It is presumed that these would remain protected, but with the level of intensification envisaged, places will likely lose a great deal of their context.
 - j. Potential to upset Ecological Restoration Works
 - (ii) Similarly, the **OOCB** is aware of areas of ecological restoration work that even include part of the subject land, which may be impacted by the level of intensification proposed. It is acknowledged that some additional mitigation in terms of waterways may be provided for. But it would seem that, again, with the proposed intensification level, there will be limits to what can be preserved, along with a heightened risk that ecological values in this rural area may be adversely affected.

The relief sought because—

The **OOCB** opposes the relief sought by the Appellants and seeks that the parts of the Decision under appeal are upheld, because:

- a. The decision correctly identified that it had not been demonstrated that there was a specific demand for housing in this particular location of the district, nor that the NPS-UD requires that a council must provide housing at this level of granularity.
- b. The decision correctly identified that the development proposed by the Appellants would be incongruous with the existing Ohoka settlement and the surrounding area.
- c. The decision correctly identified that the development proposed by the Appellants is not well-connected or accessible in respect of the rest of the District/Region, that future residents would likely be mostly reliant on private vehicles (even with the offered bus service) and that the area is not accessible to other urban areas by bicycle.
- d. The decision correctly found that the reliance on private vehicles is not consistent with the NPS-UD in respect of supporting reductions in greenhouse gas emissions.

- e. The decision correctly found that the proposed rezoning would not contribute to well-functioning urban environments and would not give effect to the NPS-UD.
- f. The decision gave appropriate regard to the CRPS and the proposed Waimakariri District Plan's proposed objectives and policies in respect to urban growth and development, and correctly found that the proposed rezoning would not give effect to these.

The **OOCB** does not agree to participate in mediation or other alternative dispute resolution of the proceedings.



.....

S Barkle

Chairperson of the **Oxford-Ohoka Community Board**

12/09/2025

.....

Date

Address for service of Oxford-Ohoka Community Board

Kay Rabe

215 High Street, Rangiora 7400

0800 965 468

com.board@wmk.govt.nz:

Contact person: [Kay Rabe – OOCB Governance Advisor

APPENDIX 2

Schedule 5 cl 7 (a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects

Effect type	AEE pages / paragraphs	Relevant technical report	Pages / sections of the relevant technical report	Matters assessed
Flood risk	pp. 103, paras 418-419	Appendix 22 - Flood Assessment - Pattle Delamore Partners	Section 7.3 Effects on Flooding (External) (pp.37-41)	Effects on current and future residents, effects on neighbouring properties and buildings, effects on roads, critical infrastructure, heritage and cultural sites, and mitigation through finished floor levels and stormwater design.
Transport, accessibility and connectivity	pp. 96-98, paras 384-394	Appendix 15 - Integrated Transport Assessment - Novo Group	Access Arrangements (pp.41-42); Wider Effects (pp. 42-50)	Traffic, safety, accessibility, connectivity, active transport and access to services. The assessment considers the transport effects of the proposal on existing and future residents, including the safety and operation of the surrounding road network, accessibility to community facilities and services, and connections to surrounding communities. It also assesses provision for walking, cycling and public transport, including active transport links to schools, open spaces, local services and the wider transport network.
Urban form	pp. 79-94, paras 306-375	-	-	Development constraints and opportunities in the district, well-functioning urban environment.
Character, landscape and amenity	pp. 100-102, paras 401-408	Appendix 23(a) - Landscape and Urban Design Assessment - DCM Urban Design	Section 4 Urban Design Assessment (pp.15-18); Section 5 Effects on Landscape Character and Values (19-22); Section 6 Effects on Visual Amenity (22-25).	Landscape character and values, visual effects, general character and amenity. The assessment also considers effects on existing and future residents through the provision of housing choice, access to local services and community facilities, connectivity, walkability, and public open space. In addition, it evaluates how the proposal integrates with the existing Ōhoka settlement, supports social interaction and community cohesion, and contributes to local amenity and quality of life through enhanced green spaces, active transport connections, and village-centre activities.
Reverse sensitivity	pp.119-120, paras 528-530	-	-	The assessment considers potential reverse sensitivity effects on surrounding rural productive activities and nationally significant infrastructure. It concludes that future residential activities will be appropriately separated from existing effluent spreading activities and that proposed conditions will ensure the operation, maintenance and upgrade of the National Grid are not adversely affected by the development.
Economic benefits (including social and economic wellbeing)	-	Appendix 02 - Economics Benefits Assessment - Market Economics	Section 4 Economic Benefits (pp.12-18)	Housing supply, housing affordability, construction employment, regional value added, commercial centre benefits, contribution to a well-functioning urban environment, and regional economic growth. The assessment also considers the economic and social benefits of increased housing choice, improved access to local services and community facilities, local employment opportunities, and the creation of a more self-sufficient and connected community. In addition, it assesses the wider benefits to existing and future residents arising from improved accessibility, reduced reliance on travel to other centres for day-to-day needs, and enhanced community wellbeing and cohesion.
Economic costs and disbenefits	p.122, paras 541-544; pp.94-95, paras 376-382	Appendix 39 - Economic Costs Assessment - Savvy Consulting	Section 2 Potential Distributional Effects (pp.7-35); Section 3 Loss of Productive Capacity (pp.36-42); Section 4 Other Economic Disbenefits (pp.43-47)	Effects on existing centres, commercial competition, productive land loss, loss of farming activity and other economic disbenefits.

Educational facilities	pp.122-123, paras 545-550	-	-	. The assessment addresses the effects of population growth on local educational facilities, including the capacity of existing schools to accommodate additional students and the role of educational infrastructure in supporting existing and future residents of the community.
Water supply	pp.107-110, paras 454-467	Appendix 17(a) - Groundwater & Water Supply Assessment - Pattle Delamore Partners	Section 6 Community Water Supply (pp.20-36).	Security and resilience of drinking water supply, groundwater allocation effects, neighbour bore effects, drawdown, stream depletion and community water supply reliability.
Stormwater management	pp.104-110, paras 423-453; pp.126-130, paras 563-590	Appendix 31 - Stormwater Management Report - Pattle Delamore Partners	Section 2.6 Flood Risk (p.6); Section 6 Proposed Stormwater Management Plan (pp.14-27); Section 7 Stormwater Runoff Quality and Quantity Effects (pp.28-29).	Flood attenuation, runoff management, downstream effects, stormwater quality treatment, hydraulic continuity and flood storage.
Wastewater	p.110 paras 468-470	Appendix 28 - Wastewater Assessment - Pattle Delamore Partners	Section 2 Existing Wastewater System (pp.2-8); Section 3 Recommended Wastewater Solution (pp.9-10).	Capacity of the existing wastewater network, servicing of future residents, infrastructure resilience and effects on the wider community.
Neighbourhood amenity during construction	pp.124-126, paras 555-562; pp130-131, paras 591-593	Appendix 32(a) - Dewatering & Dust Suppression Assessment - Pattle Delamore Partners	Section 5 Dewatering & Dust Suppresion (pp.11-34)	Construction-related dust and supression, dewatering and temporary amenity effects on neighbouring properties.
Land contamination	pp.102-103, paras 412-415	Appendix 13 - Detailed Site Investigation and Supplementary - Tetra Tech Coffey & EHS Support NZ	Contaminant risk assessment and remediation recommendations and supplementary investigations.	Human health effects from contaminated soils, asbestos, heavy metals, PAHs and historic farm-related contaminants.