



FTAA-2605-1234: Application received for referral of the project under the Fast-track Approvals Act 2024 – Stage 2 decisions

Project Name: Shannon Farm Residential and Commercial Extension

Date submitted	27 July 2026	Tracking	26-BRF-01860
Security level	In-Confidence	Priority	Urgent

To	Action sought	Response by
Hon Chris Bishop Minister for Infrastructure	Decisions on recommendations	3 August 2026

Actions for Minister’s Office staff	Return the signed briefing to: <i>FTAreferrals@mfe.govt.nz</i> Send email to Ministers to invite written comments
Number of appendices: 6	Appendices: 1. Statutory framework for making decisions 2. Application documents for Shannon Farm Residential and Commercial Extension 3. Stage 1 Briefing Note and decisions 4. Section 18 Report on Treaty settlements and other obligations 5. Comments received from invited parties under section 17 and further information received from the applicant under section 20 6. Draft Notice of Decisions

Ministry contacts

Name	Position	Telephone	1 st contact
Helen Willis	Principal Author		
Stephanie Frame	Manager	s 9(2)(a)	✓
Ilana Miller	General Manager	s 9(2)(a)	

Project location



Image 1: project location within Cromwell



Image 2: proposed site layout

Key messages

1. This briefing seeks your decisions under section 21 of the Fast-track Approvals Act 2024 (the Act) on the application from Rippon Holdings Limited and Rippon Investments Limited (the applicant) to refer the Shannon Farm Residential and Commercial Extension project (the project) to the fast-track approvals process.
2. A copy of the application is in Appendix 2. This is the second briefing on this application. The first (Stage 1) briefing (BRF-01446) with your initial decisions annotated is in Appendix 3.
3. The project seeks subdivision and land use consents for a master-planned community development across approximately 70 hectares on the north-western edge of Cromwell, in the Central Otago District.
4. The project includes:
 - a. staged subdivision of land and development of approximately 755 residential lots at a range of densities
 - b. subdivision to enable approximately 5 hectares of light industrial commercial land
 - c. subdivision to enable approximately 3 hectares of retail and mixed-use commercial land
 - d. an interconnected network of landscaped parks and green corridors, network upgrades and connections to three waters servicing
 - e. associated bulk earthworks, access arrangements and supporting infrastructure including local transport connections.
5. The project will require the proposed approvals:
 - a. resource consents under the Resource Management Act 1991
 - b. approvals under the Wildlife Act 1953.
6. The applicant advises that a single substantive application is intended to seek approval for subdivision, all residential development, and the enablement of retail/commercial and industrial uses within the proposed commercial precinct. Separate resource consent application(s) will be required for buildings within the commercial precinct, which the applicant intends to apply for outside of the fast-track approvals process.
7. The project is adjacent to an existing rural lifestyle development (Shannon Farm) owned by the applicant's subsidiary company, and which has been consented for subdivision. The applicant intends to develop the project alongside this development.
8. We recommend you **accept** the referral application. We seek your decisions on this recommendation, proposed directions to the expert panel, and notification of your decisions.

Assessment against statutory framework

9. The statutory framework for your decision-making is set out in Appendix 1. You must apply this framework when you are deciding whether to accept or decline the referral application and when deciding on any further requirements or directions associated with referral of the project.
10. Before accepting the project, you must consider the following:



- a. the application (in Appendix 2)
 - b. the section 18 Treaty settlements report (in Appendix 4)
 - c. any comments from invited parties and further information received from the applicant within the specified time frame (in Appendix 5).
11. Following that, you may accept the application if you are satisfied that it meets the criteria in section 22 of the Act and if there are no reasons meaning you must decline the application. We provide our advice on these matters below.

Section 18 Treaty settlements and other obligations report

12. The Section 18 Treaty settlements and other obligations report (the report) has identified Te Rūnanga o Ngāi Tahu, Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnanga, Waihōpai Rūnaka, Te Rūnanga o Awarua, Te Rūnanga o Ōraka-Aparima, Aukaha, and Te Ao Marama Incorporated as the relevant groups for the project area.
13. The Ngāi Tahu Claims Settlement Act 1998 is the relevant Treaty settlement for the project area. The report has not identified any other obligations such as Mana Whakahono ā Rohe or joint management agreements.
14. The Ngāi Tahu Claims Settlement Act 1998 provides for a statutory acknowledgement over Te Wairere (Lake Dunstan). While the project area does not include or adjoin this statutory area, the statutory acknowledgement may be relevant if the proposed activities (such as the discharge of stormwater) may directly affect the nearby lake.
15. Under the RMA and the relevant Treaty settlements, a consent authority must have regard to a statutory acknowledgement when deciding whether an iwi is an 'affected person' for the purposes of notification decisions and must provide a summary of any consent applications relevant to the statutory area to a statutory acknowledgement holder. The report considers the process of inviting comments (including providing information about the application) from these groups under the Act is comparable to the requirements for statutory acknowledgements under the RMA and Treaty settlements.
16. The report identifies a number of other settlement provisions – including a deed of recognition, taonga species, a conservation protocol, and a deferred selection property – which do not appear to be impacted by the application as it currently stands but nonetheless underline the traditional connection of Ngāi Tahu with this area and its environment.
17. You received comments on the application from Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Moeraki, and Aukaha. All three groups have yet to form a view on the project. Alongside Te Rūnaka o Ōtākou and Hokonui Rūnanga, Kāti Huirapa Rūnaka ki Puketeraki and Te Rūnanga o Moeraki have entered into a process agreement with the applicant as a basis for continued engagement. Kāti Huirapa Rūnaka ki Puketeraki and Te Rūnanga o Moeraki ask that you require consultation with mana whenua be completed, and a cultural impact assessment be finalised, before a substantive application is submitted. We note the applicant will be required to complete an assessment of cultural effects with the substantive application (refer to clause 7 – Matters to be covered in assessment of environmental effects in Schedule 5 of the Act).
18. There are no matters raised in the report which make it more appropriate for the proposed approvals to be authorised under another Act or Acts.

Section 16 Effects of Treaty settlements and other obligations on decision-making

19. There are no relevant documents or procedural requirements that apply to your consideration of the application.

Written comments received

20. Comments were received from Otago Regional Council (ORC) and Central Otago District Council (CODC), three Ministers, three Māori groups (detailed further below in this briefing), the Department of Conservation (DOC) and NZ Transport Agency Waka Kotahi (NZTA). The key points of relevance to your decisions are summarised in Table A and the full comments are attached at Appendix 5. A summary of the comments is provided below.
21. ORC identifies no competing applications for the project site, nor any resource consents where sections 124C(1) or 165ZI of the RMA would apply. ORC is not aware of any reason to decline project referral and includes information that should be required with any substantive application
22. CODC identifies no competing applications for the project site but provides details on the existing Shannon Farm development which is adjacent to the project site. CODC raises concerns relating to transport and infrastructure effects, and considers that existing infrastructure provisions do not have sufficient capacity to service the development
23. The Associate Minister of Housing has no objection to project referral and considers the project is likely to deliver positive economic and social benefits, including increasing housing supply for the Otago Region.
24. The Minister for Economic Growth considers the project is likely to have significant regional economic and housing benefits.
25. The Minister for Māori Crown Relations: Te Arawhiti and the Minister for Māori Development support project referral.
26. DOC is not aware of any reason the project should not be approved for referral and considers it likely that with the appropriate design and conditions, any adverse effects can be managed to appropriate levels.
27. NZTA overall has no concerns with the project being referred but considers transport impacts are likely to be significant and provides information which it considers should be included in an Integrated Transport Assessment submitted with any substantive application.
28. The following parties were also invited to comment on the project application, but no responses were received by the time of this briefing:
- a. the Minister of Conservation
 - b. the Chief Executive of Aurora Energy Limited
 - c. seven Māori groups identified under section 18 of the Act.

Further information provided by applicant

29. Further information was sought from the applicant under section 20 of the Act after the comment period had closed. Further information was sought to clarify whether the project will or may require any works within, or other use or occupation of, the bed of Lake Dunstan. This information was required because Lake Dunstan is a statutory area under the Ngāi Tahu Claims Settlement Act 1998

and the information informs any obligations under section 16 of the Act, namely, any obligations on you or a subsequent expert panel to consult with Te Rūnanga o Ngāi Tahu or the Commissioner of Crown Lands.

30. The applicant provided the response within the specified time frame and clarified that the project will not require any such works. We consider this response adequate to inform our section 18 assessment.
31. You must consider all information received within the specified timeframe. We have taken this information into account in our analysis and advice, and it is presented in Table A.

Reasons to decline

32. The statutory framework in Appendix 1 sets out the situations where you must decline the application for referral under section 21(3). We have considered these matters in detail in Table A. We have not identified any reasons under section 21(3) that you must decline the application for referral.
33. You may also decline the application for any other reason under section 21(4). The Act gives some guidance on matters you could consider when deciding whether to decline an application and these are set out in Table A where we have considered these matters in detail. We do not consider you should decline the project for any of these reasons.

Reasons to accept

34. The statutory framework in Appendix 1 sets out the reasons you can accept a project for referral.
35. Our assessment of these matters is summarised in Table A. We consider the project meets the requirements of section 22, as:
 - a. it is a development project because it involves development of approximately 755 residential lots and subdivision to enable approximately 5 hectares of light industrial land, and approximately 3 hectares of retail and mixed-use commercial land
 - b. it will have significant regional benefits because it will:
 - i. increase housing supply and address identified housing needs in the Otago Region through the delivery of approximately 755 residential lots at a range of densities, supporting projected population growth and improving housing affordability in a high-growth area
 - ii. deliver significant economic benefits, including employment of approximately 316 full-time equivalent (FTE) workers over the 8-year development period, approximately \$216 million in wages and salaries and an estimated \$365 million contribution to Gross Domestic Product (GDP), as well as increasing market responsiveness and competition
 - c. referring the project to the fast-track approvals process would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes, as the project would otherwise require a non-complying resource consent process with increased likelihood of notification, hearings, appeals and determinations by an expert panel, resulting in increased time and cost
 - d. referring the project is unlikely to materially affect the efficient operation of the fast-track approvals process because the project is well advanced by an experienced developer and has been informed by extensive technical assessments.



Conclusions

36. We consider the project meets the section 22 criteria and you could accept the referral application under section 21 of the Act and refer the project to the fast-track approvals process with the specifications outlined below.
37. We consider that if you decide to refer the project, you should specify the following matters under section 27 of the Act:
- a. the following as persons or groups from whom a panel must invite comments from in addition to those specified in section 53:
 - i. the NZ Transport Agency Waka Kotahi, as the project proposes connections to, and is in proximity to, State Highway 6
 - ii. Aurora Energy Limited, as the project site is subject to easements in favour of Aurora Energy Limited that are required to be surrendered, with consent, to enable the proposed works.

Next steps

38. The Secretary for the Environment (the Secretary) must give notice of your decisions on the referral application, and the reasons for them, to the applicant and anyone invited to comment under section 17 and publish the notice on the Fast-track website.
39. If you decide to refer the project, the Secretary must also give notice of your decision to:
- a. the panel convener
 - b. any additional iwi authorities or Treaty settlement entities that you consider have an interest in the matter other than those invited to comment under section 17
 - c. the Environmental Protection Authority (EPA)
 - d. the relevant administering agencies.
40. You must also provide all of the information you received that relates to this application to the EPA and the panel convener, including:
- a. the referral application
 - b. any comments received under section 17
 - c. the report obtained under section 18.
41. We will undertake this action on your behalf.
42. We have attached a draft notice of decisions letter to the applicant based on our recommendations (refer Appendix 6) and we will provide it to all relevant parties. We will provide you with an amended letter if required.
43. Our recommendations for your decisions follow.



Recommendations

44. We recommend that you:

- a. **Note** section 21(3) of the Fast-track Approvals Act 2024 (the Act) requires you to decline the referral application from Rippon Holdings Limited and Rippon Investments Limited (the applicant) if you are satisfied that the project involves an ineligible activity, or you consider that you do not have adequate information to inform the decision under this section or if you are not satisfied that the Shannon Farm Residential and Commercial Extension project (the project) meets the referral criteria in section 22 of the Act.

Noted

- b. **Agree** that before deciding on the application for project referral under section 21(1) of the Act you have considered:

- i. the application in Appendix 2
- ii. the report obtained under section 18 in Appendix 4
- iii. any comments and further information sought under sections 17 and 20 and provided within the required timeframe in Appendix 5.

Yes / No

- c. **Agree** you are satisfied the project will meet the referral criteria in section 22 of the Act as:

- i. it is a development project that would have significant regional benefits [section 22(1)(a)] because:
 - (1) it will increase the supply of housing and address housing needs [section 22(2)(a)(iii)] by providing approximately 755 residential lots at a range of densities, increasing housing supply and addressing housing needs in the Otago Region as a high-growth area
 - (2) it will deliver significant economic benefits [section 22(2)(a)(iv)] by providing approximately 316 full-time equivalent (FTE) jobs over an 8-year development period, approximately \$216 million in wages and salaries and an estimated \$365 million contribution to Gross Domestic Product (GDP), and increased market responsiveness and competition
- ii. referring the project would facilitate its delivery [section 22(1)(b)(i)] by enabling it to be processed in a more timely and cost-effective way than under normal processes, because the project would otherwise require a non-complying resource consent application process with an increased likelihood of notification, hearings and appeals, resulting in increased time and cost
- iii. referring the project is unlikely to materially affect the efficient operation of the fast-track approvals process [section 22(1)(b)(ii)] because the project is well advanced by an experienced developer and has been informed by extensive technical assessments, enabling the application to be progressed efficiently.

Yes / No



- d. **Agree** to accept the referral application under section 21(1) and refer the whole project to the fast-track approvals process under section 26(2).

Yes / No

- e. **Agree** to specify Rippon Holdings Limited and Rippon Investments Limited as the persons who are authorised to lodge a substantive application for the project

Yes / No

- f. **Agree**, under section 27(3)(b)(i) of the Act, to specify a deadline of two years from the date of the notice of decisions letter for the applicant to lodge the substantive application.

Yes / No

- g. **Agree** to specify under section 27(3)(b)(iii) of the Act, to specify NZ Transport Agency Waka Kotahi and Aurora Energy Limited as additional groups from whom a panel must invite comments from in addition to those specified in section 53.

Yes / No

- h. **Agree** that the Secretary for the Environment will provide your notice of decisions to:

- i. anyone invited to comment on the application including local authorities, relevant administering agencies and relevant Māori groups
- ii. the panel convener
- iii. The Environmental Protection Authority (EPA).

Yes / No

Signatures

Stephanie Frame
Manager – Fast-track Operations

Hon Chris Bishop
Minister for Infrastructure

Date:

Table A: Stage 2 analysis

Recommendation	<u>Accept</u> the referral application and refer the project to the fast-track approvals process		
Project details	Project Name	Applicant	Project Location
	Shannon Farm Residential and Commercial Extension	Rippon Holdings Limited and Rippon Investments Limited	Across approximately 70 hectares on the north-western edge of Cromwell, in the Central Otago District.
Project description	The project seeks subdivision and land use consents for a master-planned community development and includes: a. staged subdivision of land and development of approximately 755 residential lots at a range of densities b. subdivision to enable approximately 5 hectares of light industrial commercial land c. subdivision to enable approximately 3 hectares of retail and mixed-use commercial land d. an interconnected network of landscaped parks and green corridors, network upgrades and connections to three waters servicing e. associated bulk earthworks, access arrangements and supporting infrastructure including local transport connections. The project will require the proposed approvals: a. resource consents under the Resource Management Act 1991 b. approvals under the Wildlife Act 1953. The applicant advises that a single substantive application is intended to seek approval for subdivision, all residential development, and the enablement of retail/commercial and industrial uses within the proposed commercial precinct. Separate resource consents application(s) will be required for buildings within the commercial precinct, which the applicant intends to apply for outside of the fast-track approvals process. The project is adjacent to an existing rural lifestyle development (Shannon Farm) owned by the applicant's subsidiary company, and which has been consented for subdivision. The applicant intends to develop the project alongside this development.		
Minister invites comments / requests information	Comments from invited parties		
	Local authorities <i>Otago Regional Council (ORC)</i> ORC is not aware of any applications that would be considered competing applications for a substantive application and confirms there are no existing resource consents issued where sections 124C(1)(c) or 165ZI of the RMA would apply. ORC confirms there are no activities proposed by the applicant that are prohibited under its Regional Plan and is not aware of any reason to decline project referral. ORC provides information which it considers should be included/addressed in any substantive application. These are provided in full at Appendix 5 and relate to the following areas: - required consents assessments - detailed information on transport matters related to the project - natural hazards assessments - stormwater assessments - seismic hazards assessments - landslide and liquefaction hazards assessments - contaminated land assessments - risk assessments. <i>Central Otago District Council (CODC)</i> CODC confirms there are no applications that would be considered competing applications for a substantive application but notes the project adjoins a site (the existing Shannon Farm residential project which the project is anticipated to be developed alongside) with a resource consent where three variations have been granted. CODC has attached copies of decisions on these to their comments. CODC confirms there are no existing resource consents issued where sections 124C(1)(c) or 165ZI could apply.		

CODC notes concerns regarding transportation effects associated with the project – namely, the sufficiency of the current roading infrastructure, the scope of traffic modelling, and the integration of the project into the wider Cromwell transport network. CODC also notes concerns relating to water infrastructure capacity, noting that the project will require targeted upgrades to water, wastewater and stormwater reticulation and associated treatment facilities to accommodate additional unplanned urban development. CODC notes that detailed flood hazard risk assessment will be required and that future planning and funding requirements for water, wastewater and stormwater will need to be incorporated into the Water Services Strategy for the newly established Council-Controlled Organisation Southern Waters. Because infrastructure priorities will ultimately be determined by Southern Waters, CODC considers there remains uncertainty at this time regarding the project’s potential impacts.

CODC further notes, in relation to the attached resource consents for the existing Shannon Farm development, that the project should not rely on any provision of infrastructure enabled by the existing consents to service the project – noting that many infrastructure works required by that consent have not yet been completed due to the proposal having only implemented Stage 1 to date.

CODC further considers the project to be inconsistent with the Central Otago District Plan which establishes a clear expectation of low-intensity, carefully controlled rural development with protection of rural amenity values. CODC notes that the proposed subdivision across approximately 8 hectares significantly exceeds standards in the plan relating to subdivision and the project was also not identified in the Cromwell Spatial Plan as an area considered for future residential, commercial or industrial growth. CODC emphasises the requirement under sections 21 and 22 of the Act for you to consider a referral application’s consistency with relevant planning framework.

Ministers

Associate Minister of Housing

The Minister has no objection with project referral, noting that it is expected to deliver positive economic and social benefits, including increased housing capacity and supporting business land.

The Minister notes that Cromwell is currently experiencing strong housing demand due to its proximity to Queenstown and associated affordability pressures – house prices in Central Otago therefore remain high and Cromwell plays an important role in accommodating population growth and worker demand. The Minister considers the scale of the project would provide a significant increase in housing supply alongside commercial land to support local employment and help meet projected growth in the district.

The Minister notes that the project is largely zoned rural; however, it is located adjacent to the existing Cromwell urban area and nearby residential development, functioning as a ‘logical extension of the township’. The Minister notes that while the project site is not identified as a future growth area in the 2019 Cromwell Spatial Plan, its proximity to existing urban areas supports a more consolidated pattern of development and being supported by a masterplan, the project offers integrated transport connections and staged infrastructure delivery. The Minister notes that detailed infrastructure and planning matters will require further consideration but considers this can be worked through at any substantive stage.

Minister for Economic Growth

The Minister references the applicant’s Economic Assessment and considers the project is likely to have significant regional benefits under section 22(2)(a)(iv) of the Act. The Minister considers the project will deliver broader benefits relating to supporting Cromwell’s growth through a material increase in housing supply, additional local employment land, and increased local retail and industrial activity (noting that Cromwell’s population has grown from 3,510 in 1996 to 10,910 in mid-2025 and that the project would represent a substantial increase in residential development capacity in a high-growth local market).

The Minister notes that it is assumed 80 percent of the project’s direct and indirect national one-off impacts would occur in Otago and therefore the project’s benefits would mainly be realised in Cromwell and the wider Otago Region. The Minister further considers that the project may meet section 22(2)(a)(iii) of the Act, namely by increasing housing supply, addressing housing needs and contributing to a well-functioning urban environment in Cromwell.

Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

The Ministers support project referral and encourages the applicant and the panel to have due regard to relevant Treaty settlement legislation and instruments and any feedback from relevant Māori groups as set out in the Section 18 Treaty settlements and other obligations report.

Māori Groups

Aukaha

Aukaha reserves its position on project referral and notes that preparation of any substantive application will involve further detailed technical assessment and engagement with the Papatipu Rūnaka (relevant Māori authorities) on the cultural impacts of the project.

Kāti Huirapa Rūnaka ki Puketeraki (Puketeraki)

Puketeraki is yet to form a view on the merits of the project and requests you require the applicant to consult with mana whenua and complete a cultural impacts assessment prior to submitting any substantive application. Puketeraki notes the project has significance cultural significance to Puketeraki, who have entered into a Process Agreement with the applicant (prior to the applicant submitting the referral application) to engage throughout the remainder the fast-track approvals process.

Te Rūnanga o Moeraki (Moeraki)

Moeraki has yet to form a view on the merits of the project, noting that consultation with respect to any substantive application including on the nature of the project, its effects and proposed mitigations is yet to commence. Moeraki requests you require the applicant to consult with mana whenua and complete a cultural impacts assessment prior to submitting any substantive application. *We note the applicant will be required to complete an assessment of cultural effects with the substantive application (refer to Clause 7 - Matters to be covered in assessment of environmental effects in Schedule 5 of the Act).*

	Moeraki notes the project has significance cultural significance to Moeraki, who have entered into a Process Agreement with the applicant (prior to the applicant submitting the referral application) to engage throughout the remainder the fast-track approvals process. Administering agencies <i>Department of Conservation (DOC)</i> DOC is not aware of any reason the project should not be approved for referral and notes that while it does not have sufficient information to determine the level of any actual and potential environmental effects, it considers it likely that with appropriate design and conditions effects can be managed to appropriate levels. DOC notes that while no comprehensive ecological surveys have been provided by the applicant, it considers it likely that adverse effects and management conditions will be in line with similar projects. DOC considers it would be highly beneficial for DOC to further engage with the applicant as it relates to any conservation approvals prior to submitting any substantive application, to support provision of adequate information for decision-making, the management of any adverse effects and early identification and resolution of any issues. Any other persons or groups <i>NZ Transport Agency Waka Kotahi (NZTA)</i> NZTA overall has no concerns with the project being referred. NZTA notes it would need sight of any substantive application to determine actual impacts of the project on the nearby SH6 but considers impacts are likely to be significant due to the traffic generated by the project and the configuration of the proposed intersection, noting that the current transport assessment does not provide sufficient confidence regarding the scale of these effects. NZTA provides information which should be included in an Integrated Transport Assessment submitted with any substantive application, to provide sufficient detail to enable discussion on how transport effects will be appropriately managed. These are provided in full at Appendix 5 and relate to the following areas: - impacts on the state highway network(s) - strategic context and network role - traffic data and growth assumptions - existing and future network considerations - trip generation assumptions - pass-by, linked trips, and internal trip capture - trip distribution - intersection form and design - capacity analysis and level of service - staging/assumptions. NZTA welcomes the opportunity to provide comments on any substantive application.
The Minister must decline an application if the Minister is satisfied that the project involves an ineligible activity [section 21(3)(b)]	Further information from applicant Further information was sought from the applicant to clarify whether the project will or may require any works within, or other use or occupation of, the bed of Lake Dunstan. The further information was sought because Lake Dunstan is a statutory area under the Ngāi Tahu Claims Settlement Act 1998, and the information would inform you on any obligations that may arise under section 16 of the Act, specifically, an obligation on you or a subsequent panel to consult with Te Rūnanga o Ngāi Tahu or the Commissioner of Crown Lands. The applicant provided the response within the specified time frame and clarified that the project will not require any such works. We consider you can be satisfied that the project does not involve an ineligible activity because it: – would not occur on identified Māori land, Māori customary land or a Māori reservation as confirmed by the relevant records of title and consultation with iwi authorities – would not occur in a customary marine title area or protected customary rights area as it is not in the coastal marine area – is not an aquaculture activity or activity that is incompatible with aquaculture activities that would occur in an aquaculture settlement area and for which the applicant is not authorised to apply for a coastal permit because it will not occur in the CMA – would not require an access arrangement which cannot be granted under the Crown Minerals Act (including s61(1A)) because it does not include an access arrangement and would not occur on Schedule 4 land – would not be prevented by section 165J, M, Q, ZC or ZDB of the RMA because it will not occur in the CMA – would not occur on Schedule 4 land as confirmed by the records of title – would not occur on a national reserve as confirmed by the records of title – would not occur on a reserve held under the Reserves Act 1977 that is managed by or vested in someone other than the Crown or a local authority and that person has not consented in writing as confirmed by the records of title – is not a prohibited activity or decommissioning activity under the EEZA, 15B or 15C of the RMA

	– is not for the purpose of an offshore renewable energy project because it will not occur offshore or involve renewable energy production No comments raised by parties invited to comment have indicated that the project would be ineligible for referral.
The Minister must decline an application if the Minister considers they do not have adequate information to inform the decision [section 21(3)(c)]	We consider you have adequate information to inform your decision.
Relevant considerations and procedural requirements in Treaty settlement, Mana Whakahono ā Rohe, joint management agreement, or the Marine and Coastal Area (Takutai Moana) Act 2011 or the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 [section 16]	N/A.
Section 22 assessment criteria	
The project is an infrastructure or development project that would have significant regional or national benefits [section 22(1)(a)]	<i>The Minister <u>must</u> consider a relevant Government policy statement (GPS) [s22(1A)]</i> The only current GPS is the Government Policy Statement on Grocery Competition. As this project does not involve a supermarket development or grocery-related activities, there is no GPS relevant to your decision. The Minister <u>may</u> consider any of the following matters, or any other matters the Minister considers relevant: <i>Will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment [s22(2)(a)(iii)]</i> The applicant notes that the project will develop approximately 755 new dwellings which represents a substantial increase in residential development capacity in the Central Otago District. The applicant details how Cromwell's population has grown rapidly, more than trebling from 1996 to 2025, and is expected to grow by between 69% and 93% over the next 30 years. The applicant considers the increase in supply of housing particularly relevant given ongoing affordability pressures within the Central Otago District – noting that current affordability indicators demonstrate a substantial disconnect between household incomes and housing costs. The applicant therefore considers that increasing housing supply at the scale proposed is likely to improve market responsiveness to population and demand growth over time. The applicant considers the project contributes to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020) by supporting the provision of sufficient development capacity to meet expected housing demand, facilitating urban growth in a consolidated and planned manner, and promoting the efficient use of urban land and infrastructure. The Associate Minister of Housing considers the scale of the project will provide a significant increase in housing supply to help meet projected growth in the Central Otago District and notes that while the project site is not identified as a future growth area in local planning documents, the project is proximate to existing urban areas which supports a more consolidated pattern of development, and integration of transport connections. The Minister for Economic Growth considers the project may meet section 22(2)(a)(iii) of the Act by supporting Cromwell's growth through a material increase in housing supply, noting the project would represent a substantial increase in residential development capacity for a high-growth market. Based on the applicant's assessment and comments provided, we consider that the project will increase the supply of housing and address housing needs. We therefore recommend that you <u>refer the project under section 22(2)(a)(iii).</u> <i>Will deliver significant economic benefits [s22(2)(a)(iv)]</i> The application includes an Economic Assessment which considers the project will meet section 22(2)(a)(iv) by supporting immediate economic activity and the long-term growth, functionality and affordability of Cromwell. The applicant notes that the project is 'underpinned by strong project population growth in Cromwell' which is expected to significantly outpace the wider Central Otago District and reinforce the town's role as a 'key growth node'. The applicant considers the project responds to this by providing substantial short-term economic benefits through the 8-year planning and development stage, including employment for approximately 316 full-time equivalent workers, approximately \$216 million in wages and salaries and an estimated \$365 million contribution to GDP. The applicant further considers that, for the longer term, the project provides a significant uplift in housing supply which will increase market responsiveness and competition within a district with ongoing affordability pressures. Additionally, the applicant considers the project meets section 22(2)(a)(iv) by enabling light industrial and retail/commercial land for a range of business activities to support local economic resilience and employment opportunities – noting that the projected growth in Cromwell's retail demand indicates capacity for approximately 24,300m² of additional core retail floorspace by 2048 and that the project responds to this demand.

	The Associate Minister of Housing considers the project is expected to deliver positive economic benefits by supporting business land and the Minister for Economic Growth considers the project is likely to have significant regional benefits under section 22(2)(a)(iv) by supporting Cromwell's growth, additional local employment land, and increased local retail and industry activity. Based on the applicant's assessment and comments provided, we consider that the project will deliver significant economic benefits for the Otago Region. We therefore recommend that you <u>refer the project under section 22(2)(a)(iv).</u> <i>Is consistent with local or regional planning documents, including spatial strategies [s22(2)(a)(x)]</i> The applicant provides an assessment of the project against the following: - The Partially Operative Regional Policy Statement 2019 - The Proposed Regional Policy Statement 2021 - Central Otago District Plan - Cromwell Master Plan - Kāi Tahu ki Otago Natural Resource Management Plan (2005) - Te Tangi a Tauira – The Cry of the People: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan (2008). The applicant's assessments are provided in full at Appendix 2. Overall, the applicant considers the project is consistent or generally consistent with the documents listed above. Otago Regional Council considers the project may be broadly consistent with strategic transport and urban planning objectives but notes that further work is required at any substantive stage. Central Otago District Council considers the project is inconsistent with the Central Otago District Plan and Cromwell Spatial Plan by significantly exceeding subdivision standards and being in an area not identified for future residential, commercial or industrial growth. The Associate Minister of Housing also notes that the project site is not identified as a future growth area in the Cromwell Spatial Plan. Due to the planning inconsistencies which will require further analysis at any substantive stage, we do not consider that you should refer the project under section 22(2)(a)(x).
Referring the project to the fast-track approvals process [section 22(1)(b)]	<i>Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes [s22(1)(b)(i)]</i> The applicant considers that referring the project would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes, as the scale of the project and the site's underlying zoning would necessitate a non-complying resource consent process and a number of policy challenges under standard process – creating significant delays and complexities including notification, hearings and potential appeals. The applicant highlights specifically that Central Otago District Council staff do not have delegation to assess and make a determination of a non-complying resource consent and that rather an independent panel would be established – again adding significant timing and cost constraints. We consider this assessment reasonable. <i>Is unlikely to materially affect the efficient operation of the fast-track approvals process [s22(1)(b)(ii)]</i> The applicant considers that referring the project is unlikely to materially affect the efficient operation of the fast-track approvals process because the project has been the subject of significant early planning and assessment by a range of technical experts to ensure project design is well advanced with understood effects. The applicant further notes that it is an experienced group of developers familiar with approval seeking requirements and stakeholder considerations for this project. We consider this assessment reasonable.
Reasons to decline	
Minister <u>must</u> decline [section 21(3)]	<i>The Minister <u>must</u> decline a referral application if:</i> <i>The application may not be accepted under subsection 1 (meets referral criteria)</i> We consider the project is a development project that would have significant regional benefits as anticipated by subsection 1 of the Act. If you agree, there is no reason to decline the application for referral under this subsection. <i>The Minister is satisfied the project involves an ineligible activity</i> We consider you can be satisfied the project does not involve an ineligible activity. If you agree, there is no reason to decline the application for referral under this subsection. <i>The Minister considers that they do not have adequate information to inform the decision under this section</i> We consider you have adequate information to inform your decision on the referral application. If you agree, there is no reason to decline the application for referral under this subsection. <u>We have not identified any reason that you must decline the application under section 21(3).</u>

Minister may decline [section 21(4) and 21(5)(a-h)]

The Minister may decline a referral application for any other reason, whether or not it meets the criteria in section 22.

Reasons to decline a referral application under subsection 4 include, without limitation:

The project would be inconsistent with a Treaty settlement, Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, Marine and Coastal Area (Takutai Moana) Act 2011, a Mana Whakahono ā Rohe, or a joint management agreement

No specific inconsistencies have been identified within the section 18 Treaty settlements report.

It would be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts

The section 18 Treaty settlements report has not identified any matter which would make it more appropriate for the proposed approvals to be authorised under another Act or Acts.

The project may have significant adverse effects on the environment

The application includes an assessment of the anticipated and known adverse effects of the project on the environment and includes:

- productive capacity effects
- landscape effects
- urban design effects
- infrastructure effects
- economic effects
- transport effects
- ecological effects
- natural hazards effects
- iwi and cultural effects
- heritage effects
- contaminated land effects
- reverse sensitivity effects.

Overall, the applicant considers that any effects are acceptable, with potential impacts able to be appropriately managed through design responses and mitigation measures.

DOC considers it likely that any adverse effects associated with the project can be managed to appropriate levels. Otago Regional Council considers there are matters related to potential effects which should be addressed in any substantive application. Puketeraki and Moeraki note the project has significant cultural significance to these groups and that the project's potential cultural effects and mitigation measures are yet to be properly assessed.

NZTA considers there are potentially significant transport effects associated with the project but does not have concerns with project referral and considers effects can be worked through with appropriate mitigation measures. Central Otago District Council has expressed concerns relating to transportation effects and infrastructure effects associated with the project, particularly water infrastructure capacity issues with the already consented and associated Shannon Farm development adjacent to the project.

We note that the Act does not require the applicant to provide a full assessment of environmental effects with a referral application, and the information provided is adequate for a referral stage application. The only environmental effects which are potentially significant are those associated with transport and infrastructure, which we consider are matters that are best placed to be considered by an expert panel with the benefit of a full application with technical assessments, relevant expert input, and further input from commentators. An expert panel has the ability to seek technical advice and impose conditions as deemed appropriate or decline the application if the effects outweigh the benefits.

The applicant has indicated the intention to supply relevant and detailed information on these matters to an expert panel, and in addition to the information requirements in the Act, we do not consider it necessary to include additional information to support an effective assessment. Following a decision on the referral application, the applicant will also have access to the comments received by invited parties and can have regard to these matters when determining the scope of information and technical assessments to include with the substantive application.

Accordingly, we do not consider you should decline the application on the basis of potentially significant adverse environmental effects.

The applicant(s) has a poor compliance history under a specified Act that relates to any of the proposed approvals

Otago Regional Council notes that there was an enforcement action taken against New Zealand Cherry Corp (Leyser) LP for the existing Shannon Farm development (since cancelled) where there were issues concerning residential earthworks, works on contaminated lands and the diversion of water and reclamation of a watercourse.

Otago Regional Council does not expect these issues would arise for the project. We note that in any case, the applicant for the project is different to the above entity with an enforcement action and therefore this is not applicable to your referral decision. We do not consider you should decline the project on this basis.

The project area includes land that the Minister for Treaty of Waitangi Negotiations considers necessary for Treaty settlement purposes

No comments received from invited parties have indicated that the project area includes land necessary for Treaty settlement purposes.

The project includes an activity that is a prohibited activity under the Resource Management Act 1991

No prohibited activities under the RMA are sought for the project.

A substantive application for the project would have one or more competing applications.

Neither Otago Regional Council nor Central Otago District Council have identified any competing applications for the project.

In relation to any proposed approval of the kind described in section 42(4)(a) (resource consents), there are one or more existing resource consents of the kind referred to in section 30(3)(a)

Otago Regional Council has not identified any existing resource consents issued where sections 124C(1)(c) or 165ZI of the RMA would apply.

We do not recommend you decline the application.

Appendix 1: Statutory framework summary

1. You are the sole decision maker for referral applications. If you accept a referral application, then the whole or part of the project will be referred to the fast-track approvals process.
2. If a Treaty settlement, the Marine and Coastal Area (Takutai Moana) Act 2011, the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, a Mana Whakahono ā Rohe or a joint management agreement provides for consideration of any document or procedural requirements, you must, where relevant:
 - a. give the document the same or equivalent effect through this process as it would have under any specified Act; and
 - b. comply with any applicable procedural requirements.
3. You must decline a referral application if:
 - a. you are satisfied the project does not meet the referral criteria in section 22
 - b. you are satisfied the project involves an ineligible activity (section 5)
 - c. you consider you do not have adequate information to inform your decision.
4. You may decline an application for any other reason, including those set out in section 21(5) and even if the application meets the section 22 referral criteria.
5. You can decline an application before or after inviting comments under section 17(1). However, if comments have been sought and provided within the required time frame, you must consider them, along with the referral application, before deciding to decline the application.
6. If you do not decline a referral application at the initial stage you must copy the application to, and invite written comments from:
 - a. the relevant local authorities
 - b. the Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development
 - c. any other relevant portfolio Ministers
 - d. the relevant administering agencies
 - e. the Māori groups identified by the responsible agency
 - f. the owners of Māori land in the project area (if applicable)
 - g. you may provide the application to and invite comments from any other person.
7. You can request further information from an applicant, any relevant local authority or any relevant administering agency at any time before you decide to decline or accept a referral application (see section 20 of the Act).
8. However, if further information has been sought and provided within the required time frame you must consider it, along with the referral application, before deciding to decline the application.