

File ref: FTAA-2607-1260

31/07/2026

Hughes Developments Limited

[REDACTED]

Christchurch 8013

New Zealand

By email: [REDACTED]

Tēnā koe,

Request for further information in relation to your application under the Fast-track Approvals Act 2024

You lodged a substantive application, Bangor Village, under the Fast-track Approvals Act 2024 (the Act) on 14 July 2026.

Prior to referring a substantive application to an Expert Panel, the EPA must assess the completeness and scope of the application to ensure it complies with section 46(2) of the Act. To assist with making this assessment, under section 46(2A) of the Act the EPA may seek further information from you.

Request for Further Information

To inform the EPA's assessment of the application for completeness, please provide a response to the following matters:

Resource Consent – Schedule 5 information requirements

1. Clause 5(1)(f) of Schedule 5 requires a description of any other resource consents required for the project to which the consent application relates. Through mandatory consultation, Canterbury Regional Council (CRC) has advised that *“the application does not include a full description of the resource consents required to undertake the proposed activities”* and has identified that *“based on the information available in the application, the following consents would also be required from CRC:*
 - *Water Permit – RMA s14 – Take and use of surface water – LWRP Rule 5.126*
 - *Discharge Permit – RMA s15 – Discharge of water to land – LWRP Rule 5.126”*

“In addition to the above requirements, an additional resource consent may be required if the damming of the water race(s) would occur over contaminated or potentially contaminated land:

- *Water Permit – RMA s14 – To dam surface water – LWRP Rule 5.155”*

In accordance with clause 5(1)(f), please confirm if any other resource consents are required for the project to which the consent application relates, and if so, provide a description of these and whether the applicant intends to seek these via the Fast Track Approvals Process.

2. Clause 5(1)(g) of Schedule 5 requires an assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991 (RMA). The substantive application does not appear to include an assessment against sections 7(ba) and 7(j) of the RMA, namely the efficiency of the end use of energy, and the benefits to be derived from the use and development of renewable energy.

In accordance with clause 5(1)(g), please provide an assessment of the activity against section 7(ba) and 7(j) of the RMA.

3. Canterbury Regional Council, through the mandatory consultation processes with the EPA, has noted *“Information that CRC considers is lacking or could be clarified to meet FTAA s44 are listed below:*
 1. *Assessment of flood effects for surrounding sites [Sch 5 - 5(4)(a) / (b)];*
 2. *Detailed calculations of stormwater management facilities [Sch 5 - 6(1)(a)/(d) and 7(a)/(c)/(e)];*
 3. *Full investigation of existing contaminated areas at site [Sch 5 - 6(1)(a)/(d) and 7(a)/(c)/(e)];*
 4. *Draft Remedial Action Plan for addressing existing contaminants [Sch 5 - 6(1)(a)/(d) and 7(a)/(c)/(e)]”*

To assist us in assessing if the application complies with the above elements of clauses of 5 and 6, please provide any further information you wish us to consider in response to above matters identified by CRC.

Wildlife Act Authority – Schedule 7 information requirements

The Department of Conservation, through the mandatory consultation processes with the EPA, has noted that *“the following information is not in sufficient detail:*

4. *The applicant has not provided adequate details on the suitability of the proposed release sites. Engineering information to support the claimed suitability of the Selwyn River release site has not been provided (Schedule 7, cl 2(1)(b));*

To assist us in assessing if the application complies with clause 2(1)(b), please provide any further information you wish us to consider regarding the proposed lizard release sites in response to the above matters identified by DOC.

5. *The applicant has not provided adequate evidence of the species present at the site or the proposed secondary release site. This is important, as morphological features alone are not adequate to distinguish between Canterbury grass skinks (At-Risk, Declining) and southern grass skinks (At-Risk, Declining) and it is not appropriate to mix different species of skinks (Schedule 7, cl 2(1)(d));*

To assist us in assessing if the application complies with clause 2(1)(d), please provide any further information you wish us to consider in response to these matters identified by DOC

6. *The applicant has not identified contingency methods in the case of unanticipated circumstances (Schedule 7, cl 2(1)(k));*
- a. In relation to the above, DOC has noted the following categories of information about which contingency information could be provided:
- *More lizards are caught than estimated;*
 - *A different species than the surveyed species is found;*
 - *The on-site lizard release area is not ready;*
 - *The lizard release area reaches carrying capacity;*
 - *Unsuitable weather causes delays with lizard salvage;*
 - *The staging of works changes;*
 - *Lizards are found outside of demarcated thresholds;*
 - *Mortality occurs above an agreed threshold.*

To assist us in assessing if the application complies with clause 2(1)(k), please provide any further information you wish us to consider in response to these matters identified by DOC.

7. *While a register of consultation includes a table with dates and a summary of comments received at consultation, the proof and details of consultation (including emails and meeting notes) is not included, which makes it difficult to understand the full context of consultation (Schedule 7, cl 2(1)(n)).”*

In accordance with clause cl 2(1)(n), please provide proof (e.g., copies of emails or meeting notes) of all consultation including with hapū or iwi, on the application specific to wildlife impacts.

Responding to the Request for Further Information

Under the Act, you have until the end of the 20th working day from the date of this letter to provide a response to the EPA, which is 28 August 2026.

From the date of this letter, the 15 working day timeframe for the EPA to decide on completeness and scope of the substantive application ceases to run. The 15 working day timeframe will recommence once your response is received or after 28 August 2026, whichever is sooner.

If you wish to clarify any matter relating to the request, and the request was generated from the EPA's consultation with an administering agency or local authority, we suggest that you contact that administering agency or local authority directly before providing your response to the EPA.

If you require information from the EPA in relation to the request for further information, you may request that information from the EPA under section 46(2C) of the Act. Please send your request to info@fasttrack.govt.nz.

The EPA intends to publish the information received from you in full, including your responses in our completeness memorandum, on the Fast-track website.

If you have any questions, please contact Keely Paler, Application Lead by email at info@fasttrack.govt.nz

Nāku noa, nā

A handwritten signature in black ink, consisting of stylized, overlapping loops and a long horizontal stroke extending to the right.

Ben Bond

Team Leader, Fast-track Applications