16 September 2026

Environmental Protection Authority
Te Mana Rauhī Taiao

c/- Awesta Seddiqi

FTAA-2607-1260

For the attention of the Panel Convener

We refer to Minute 2 of the Panel Convener issued on 10 September 2026, which records your decision to schedule a conference to discuss the appointment of Panel members and the timing of the Panel's decision on Hughes Developments Limited's (*Hughes*) substantive application to undertake a residential development in Darfield, known as Bangor Village (*the Project*) (*Application*).

This letter addresses the information requested in Minute 2 being:

- the approvals sought for the Project and the complexity of the substantive application for the Project;
- the consultation and engagement undertaken by Hughes and the key issues arising in relation to the Project;
- Mātauranga Māori and tikanga;
- the appointment of Panel members;
- the timing of the Panel's decision; and
- procedural requirements.

1 The Project

The Project site is located at 160 Bangor Road, in the north-west corner of the Darfield township in the Selwyn District of Canterbury (*the Site*). The Project is described in detail at section 3 of the Substantive Project Assessment which forms part of the Application. In summary, the Project involves:

a. Subdivision of the Site and associated land development (including earthworks) to create:

   i. 743 allotments to enable the establishment of 743 dwellings.

   ii. six allotments to be vested in Selwyn District Council (*SDC*) as recreation reserves; and

   iii. one allotment to accommodate the necessary utility infrastructure.

b. Landscaping and development of a comprehensive network of public green spaces framed around two branches of an existing irrigation water race. The primary branch of the water race will be realigned and enhanced as part of the Project, while the secondary branch in the south-eastern corner of the Site will also be enhanced as part of the Project.

c. Construction of associated infrastructure and utilities to support the new neighbourhood, including roading and pedestrian connections and three waters infrastructure.

Approvals sought

All necessary resource consents for the Project are sought under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (*NES-CS*), the Canterbury Land and Water Regional Plan (*LWRP*) and the Partially Operative Selwyn District

Plan (*District Plan*). These consents would otherwise be sought under the Resource Management Act 1991 (*RMA*). A wildlife approval to authorise the capture, salvage, transfer and incidental killing of lizards is also sought.

A detailed overview of the approvals sought is set out at sections 3.26 - 3.28 of the Substantive Project Assessment. In summary:

a. Resource consent is required under the District Plan to authorise the following activities for the Project:
    i. Subdivision.
    ii. Earthworks.
    iii. Non-compliance with fencing heights.
    iv. Non-compliance with building coverage and setback rule requirements.
    v. Non-compliance with transport standards.
b. Resource consent is required under the LWRP to authorise the following activities for the Project:
    i. Excavation of material.
    ii. Discharge of operational and construction phase stormwater.
    iii. Non-consumptive water-take from an artificial waterbody where the water will be discharged into the same waterbody.
    iv. Discharge of water taken from an artificial waterbody where the water will be discharged into the same waterbody.
    v. Damming of water within an artificial watercourse to enable realignment and naturalisation of the watercourse.
c. Resource consent is required under the NES-CS for subdivision and the disturbance of potentially contaminated soil.

Overall, the Project is classified as a non-complying activity. The particular restrictions on non-complying activities imposed under section 104D of the RMA do not apply to the assessment of substantive applications under the Fast-track Approvals Act 2024 (*FTAA*).[1]

Previous application

Hughes lodged a resource consent application with SDC in June 2024 to subdivide the Site into 392 residential lots and supporting reserves and infrastructure. A decision on whether to notify the application had not yet been made when, at the request of Hughes, processing of the application was placed on hold in October 2024. The resource consent application was formally withdrawn in March 2026 when the Project was referred by the Minister under the FTAA.

Complexity

Minute 2 invites feedback on three matters (which may have a bearing on Panel appointment), specifically those which have some evidentiary complexity, legal complexity or factual complexity.

Legal complexity

Hughes considers that the Application does not raise any legal complexities beyond those that would commonly be encountered in resource consent or wildlife permit applications of this nature and scale. It does not give rise to any exceptional, difficult or novel legal issues that would be unfamiliar to experienced resource management practitioners.

[1] FTAA, ss 81(2), 81(3)(a); Schedule 5, cl 17.

Evidential complexity

Ten expert technical reports have informed the Application and have been lodged alongside the Substantive Project Assessment. With respect to the key effects generated by the Project:

a. **Urban design and landscape:** Hughes has dedicated particular attention to ensuring the Project will integrate with, and respond sensitively to, the receiving environment immediately adjoining the Site and within Darfield more generally. The placement of larger lots on the perimeter of the Site, in conjunction with various landscaping initiatives, is intended to maintain the sense of spaciousness and rural character, particularly along the western and northern boundaries of the Site. The smaller lots have been located more centrally within the Site, which will concentrate more activity around the central reserve and ensure any effects resulting from the difference in character (between the larger lots and the smaller, more suburban-sized lots) are internalised within the Site. The subdivision layout has been designed to incorporate and enhance, where possible, the existing natural features of the Site, including the existing planting within what will be the central reserve, the Waterways, and the orientation of lots toward views of the Southern Alps. The provision of a dedicated dryland-ecosystem area along with the increase in planting and enhancement of the Waterways will also generate positive ecological and landscape outcomes. As discussed further below, Hughes has undertaken initial engagement with the urban design and landscape advisor appointed by SDC in relation to the Project and is currently working through the feedback received.

b. **Transport:** To accommodate additional traffic generated by the Project, significant transport upgrades are proposed at the proposed entrances to the Site, at the intersection of Bangor Road / SH77 and McLaughlins Road, and (if required) at the intersection of Bangor Road / SH77 and West Coast Road / SH73. Hughes is also proposing to upgrade the existing pathway between the Site to the Darfield township to better support walking and cycling connectivity from the Site. Subject to the implementation of these upgrades, Hughes's transport experts confirm that the additional vehicle movements generated by the Project can be safely and efficiently accommodated within the transport network. As discussed further below, Hughes's transport experts have been engaging with NZ Transport Agency Waka Kotahi (*NZTA*) in relation to the Application since May 2026. Initial engagement with SDC's transport expert has also been undertaken and will continue in the coming weeks.

c. **Infrastructure and servicing:** Water supply and wastewater servicing will be provided for the Project via connection to Selwyn Water's reticulated networks, with all necessary connections being funded and constructed at the cost of Hughes. At the request of Selwyn Water Limited and in response to the current capacity constraints at the Pines Wastewater Treatment Plant, Hughes has amended its wastewater servicing proposal from a gravity-based solution to a low-pressure sewer system which will reduce pressure from the Project on network capacity during peak flows. Hughes's infrastructure experts are continuing to engage with Selwyn Water in relation to the wastewater and water supply servicing proposed for the Project.

d. **Contamination:** There are identified discrete areas of potential contamination within the Site. Detailed investigation will be undertaken as part of the initial stage of works for the Project as required by condition 49A of the Proposed SDC Conditions. Overall, the contamination is localised and can be appropriately managed through further investigation, targeted remediation and, where necessary, the removal and disposal of contaminated soil in accordance with the Proposed SDC and Environment Canterbury (*ECan*) Conditions.

Overall, the evidentiary material provided in support of the Application is consistent with that typically provided for an application for development of this type and scale.

With respect to the potential environmental effects of the Project, the technical assessments conclude that, taking into account the proposed conditions of consent and proposed management plans, the Project's adverse effects will be appropriately managed. In particular, the proposed conditions and other measures will avoid, remedy,

mitigate, offset or compensate for adverse effects, as applicable, such that those effects do not warrant declining the approvals sought when weighed against the Project's regional or national benefits.[2]

Hughes does not consider that the material provided is unusually onerous in terms of volume, or in terms of the complexity of the matters that it addresses. There are no evidentiary issues in contention that have not been addressed through the proposed conditions of consent. In the event of any technical areas of disagreement being raised by any other party, Hughes considers that standard procedural tools such as conferencing will assist in the resolution of those matters.

Factual complexity

Hughes does not consider that there are any unique or particularly complex factual matters associated with the Application.

2 Consultation and engagement

The Application identifies the parties who are considered to be affected by the Project and summarises the consultation that Hughes has undertaken in relation to the Project. [3]

Since the Application was lodged, Hughes has undertaken further engagement with:

a. **Environment Canterbury.** Hughes has engaged with ECan in relation to the matters it raised as part of its comments on the completeness of the Application. Since responding to ECan's comments on 21 August 2026, Hughes has completed further modelling of pre- and post-development flood levels experienced at properties downstream of the Site. That modelling has been provided to ECan with commentary from Hughes's civil engineering expert confirming that, through detailed design, the Project will ensure that there are no increases in post-development flood levels downstream of the Site.

b. **Selwyn District Council.** Representatives from Hughes met with representatives from SDC on 11 September 2026 to discuss SDC's initial transport and urban design feedback on the Application. Hughes's experts will continue to engage with SDC's transport and urban design experts in relation to that feedback in the next two weeks. Further engagement with SDC's planning team on the Proposed SDC Conditions is also intended to occur in the next two weeks.

c. **Mahaanui Kurataiao Limited and Whitiora Centre Limited.** Both organisations confirmed that at this stage they did not have further comments on the Application but would be providing comments in response to the invitation that they will receive from the Panel, once appointed.

d. **NZ Transport Agency Waka Kotahi.** Hughes's transport expert has been engaging directly with representatives from NZTA on the Application since May 2026, and the feedback provided by NZTA has directly informed aspects of the Project including the location of connections to the surrounding road network and the extent of upgrades proposed. Following its review of the Integrated Transport Assessment, NZTA requested further information from Hughes's transport expert which was provided on 20 August 2026.

e. **The Department of Conservation.** A workshop between ecologists advising the Department of Conservation and Hughes is scheduled for Friday 25 September 2026. The focus of that workshop will be on identifying – and where possible, resolving - any remaining points of difference relating to the proposed management of wildlife as part of the Project.

3 Mātauranga Māori

Hughes has engaged with Mahaanui Kurataiao Limited and Whitiora Centre Limited in relation to the Project to understand the extent to which there are specific matters of value, tikanga and/or Mātauranga Māori which are engaged by the Project. Where comments by Mahaanui Kurataiao Limited and Whitiora Centre Limited have been provided, Hughes has responded to those comments as outlined in Attachment 17 of the Application. Hughes is committed to continued engagement with the Rūnanga and their representatives.

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2 Refer Substantive Project Assessment at section 18.62.
3 Refer Application, Attachment 16 - Affected Party Engagement Register.

4 Panel appointment

Hughes considers that the appointment of three Panel members is appropriate for the Application and does not consider that there are any factors warranting the appointment of additional members. In respect of Panel composition, Hughes considers that planning expertise would assist.

5 Timing of Panel decision

A draft timeline proposed by Hughes is set out in **Attachment A.**

As set out in that timeline, a decision timeframe of 55 working days following the receipt of comments is considered to be appropriate to enable the Panel sufficient time to make a robust decision.

The draft timeline proposed is made on the basis that:

a. Hughes is continuing to engage directly with key parties including the local authorities and NZTA on both the design and layout of the Project and the Proposed SDC and ECan conditions. To date, considerable progress has been made toward resolving outstanding areas of concern for ECan and NZTA in relation to the Project. Hughes is committed to working constructively with SDC and its experts (and any other interested party) throughout the processing of the Application to resolve any concerns, where possible, or at least narrow any issues in contention.

b. Although the Application includes significant expert assessment, it is not considered to be legally, evidentially or factually complex.

c. The Panel will have the power to request further information and reports in accordance with section 67 of the FTAA and the power to appoint a special and/or technical advisor in accordance with clause 10 of Schedule 3 to the FTAA if required.

6 Procedural requirements

Hughes is willing to engage directly with the Panel and other participants as necessary and where appropriate to efficiently advance the progress of the Application.

Hughes does not consider that any form of hearing process is required for the Application, given the relatively straightforward nature of the Application. Hughes is, however, happy to participate in any conferencing, consultation, or other procedural events that the Panel considers would assist with the efficient processing of the Application.

At this stage, the draft timeline proposed in **Attachment A** does not account for any conferencing or other process, but Hughes considers that sufficient time is available within the 55 working day period for conferencing to occur, if desirable.

7 Conclusion

Hughes thanks the Panel Convener for the opportunity to attend the conference and to comment on relevant matters.

Kind regards,



Rachel Murdoch – General Manager
Hughes Developments Limited

Attachment A – Draft Timeline

Task	Working Days	Date
Panel commencement	N/A	12 October 2026
Invite comments from relevant parties	10 w/d later	27 October 2026[4]
Comments close for participants (other than Hughes) (ss 53 & 54)	20 w/d later	24 November 2026
Comments close for Hughes (s 55)	5 w/d later	1 December 2026
Any other procedural steps, evaluation and decision writing	15 w/d later	12 January 2027[5]
Draft decision is to approve		
Draft decision and conditions to Ministers (s 72)	5 w/d later	19 January 2027
Response from Ministers (s 72)	10 w/d later	2 February 2027
Hughes response to Ministers comments (if any)	5 w/d later	10 February 2027[6]
Draft conditions and decision to participants (s70(1))	5 w/d after drafts provided to Ministers	26 January 2027
Participant comments on draft conditions (s70(2))	5 w/d later after receipt of drafts	2 February 2027
Hughes response to participants on conditions (s70(4))	5 w/d later	10 February 2027[7]
If not agreed, procedural step in relation to draft conditions	5 w/d later	17 February 2027
Evaluation and finalise decision, decision release	10 w/d later	3 March 2027
Total	55 w/d following the close of comments	

4 Accounting for Labour Day, observed Monday 26 October 2026.
5 Accounting for statutory Christmas shut down between 20 December 2026 and 10 January 2027.
6 Accounting for Waitangi Day, observed Monday 8 February 2027.
7 Accounting for Waitangi Day, observed Monday 8 February 2027.