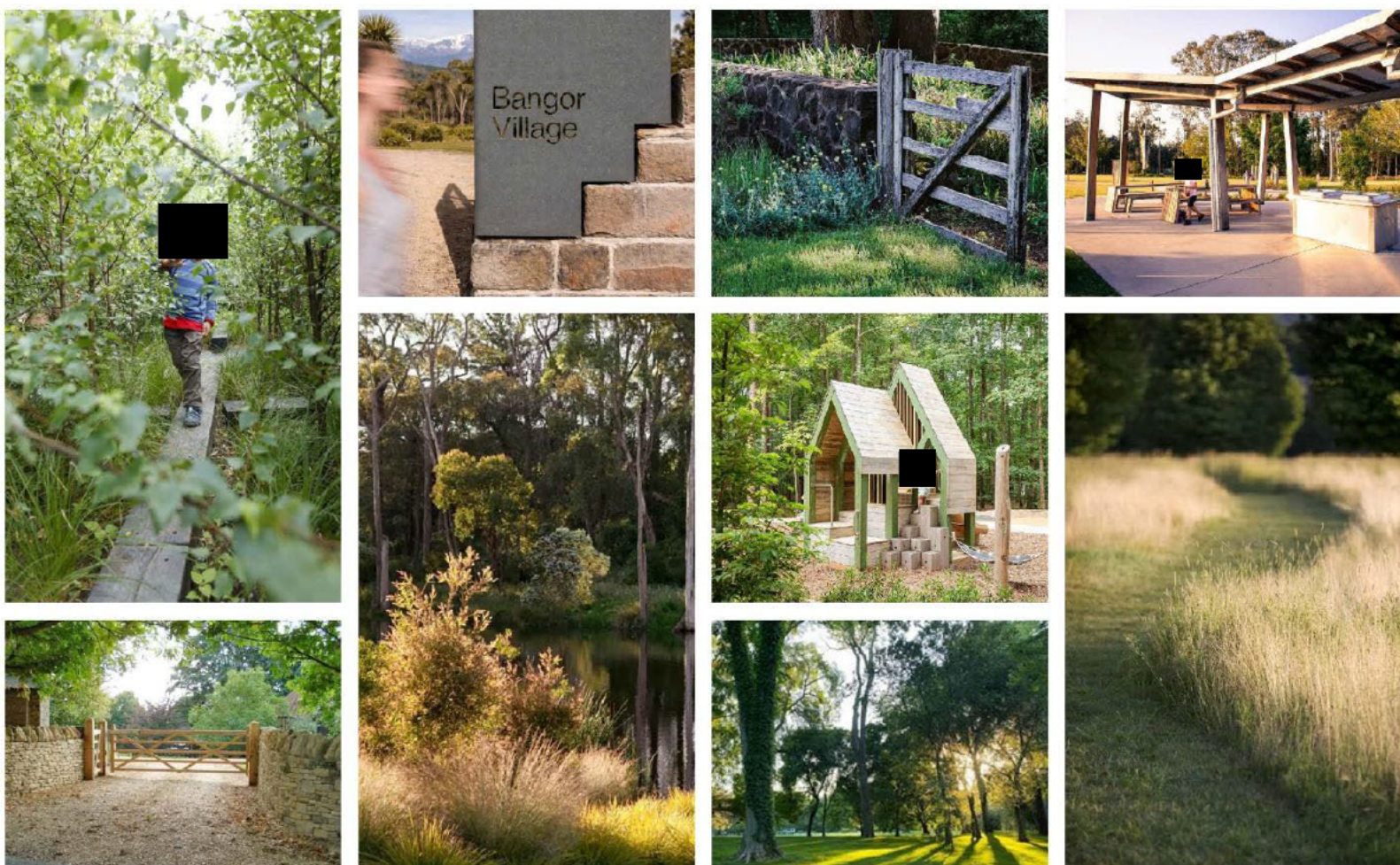




Bangor Village

Substantive Project Assessment

Hughes Developments Limited

14 July 2026

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1 Introduction

- 1.1 Hughes Developments Limited (*HDL* or *the Applicant*) seeks resource consents and a wildlife permit under the Fast-track Approvals Act 2024 (*FTAA*) to authorise the subdivision and development of Bangor Village, a new residential community located at 160 Bangor Road in the Canterbury township of Darfield (*the Site*) (*the Project*).
- 1.2 Bangor Village is a referred project under the FTAA.¹ As such, this application is being lodged with the Environmental Protection Authority (*EPA*) in accordance with section 42(1)(a) of the FTAA.
- 1.3 The substantive application for the Project comprises:
 - (a) The completed EPA substantive application form.
 - (b) This assessment which includes information required by the FTAA and referenced in the substantive application form (*Substantive Project Assessment*).
 - (c) The attachments referenced in the substantive application form and this Substantive Project Assessment.

Authors

- 1.4 The Substantive Project Assessment has been prepared by planners Mark Brown (Davie Lovell Smith Limited (*DLS*)) and Jason Jones (Blue Ridge NZ Limited).

Qualifications and relevant experience

- 1.5 Mark Brown is a director at DLS. He holds the qualifications of a Bachelor of Arts, a Post Graduate Diploma and a Masters of Regional and Resource Planning. He has over 25 years' experience as a planner working in the Christchurch and Selwyn districts and has prepared planning assessments and evidence on a variety of residential projects including the Faringdon residential development in Rolleston (3000+ lots), Barton Fields in Lincoln, and Karamutu Oaks in Leeston.
- 1.6 Jason Jones is a director of Blue Ridge NZ Limited, an urban and environmental planning consultancy founded in earlier in 2026. Prior to his current role, he was a principal consultant for Resource Management Group Limited since March 2008. Jason holds a Bachelor of Science from the University of Georgia's School of Geology (USA) and a Post-Graduate Diploma in Science (Geography) from the University of Canterbury. He has over 20 years' professional experience in resource management planning in New Zealand and is an Associate Member of the New Zealand Planning Institute.
- 1.7 Jason has authored proposed plans; district plan chapters dedicated to subdivision and urban development; public and private plan changes; and section 32 reports across multiple jurisdictions across New Zealand – including within Greater Christchurch – with a particular focus on residential and mixed-use development proposals.

¹ FTAA-2511-1151.

1.8 Jason has also:

- (a) authored outline development plans and associated plan provisions for three development areas at Lincoln and Rolleston as codified in the Partially Operative Selwyn District Plan (*District Plan*);
- (b) prepared subdivision consent applications for various large-scale development projects and processed large-scale subdivision applications on behalf of councils across New Zealand, including in Selwyn District and Christchurch City; and
- (c) prepared applications for consent under the previous COVID-19 Fast Track legislation, and sat on an Expert Consenting Panel under the same legislation for the proposed residential development of surplus land at Ōtaki Māori Racecourse.

1.9 Jason holds commissioner and chair accreditations under the 'Making Good Decisions' programme administered by the Ministry for the Environment and Local Government New Zealand. His current appointments include membership of the Panel appointed by Hutt City Council to hear submissions on its Proposed District Plan throughout 2026.

Code of conduct

1.10 Mark and Jason confirm that they have read the Code of Conduct for Expert Witnesses set out in the Environment Court Practice Note 2023 and that this Substantive Project Assessment has been prepared in accordance with the Code. Mark and Jason confirm that they have not omitted consideration of material facts that might alter or detract from the opinions they express in this Assessment and that the planning analysis they provide in this Assessment is within their areas of expertise, except where they state that they are relying on the opinion or analysis of other experts.

2 Compliance matters (clause 5(1)(c), Schedule 5)

2.1 The substantive application for the Project complies with section 46(2)(a), (b) and (d).

Section 46(2)(a): compliance with sections 42 – 44 of the FTAA

2.2 In relation to section 42 of the FTAA:

- (a) Bangor Village is a referred project under the FTAA and HDL is the authorised person in respect of the Project.²
- (b) The substantive application (including this Substantive Project Assessment) seeks the following approvals described in section 42(4) of the FTAA:³
 - (i) resource consents that would otherwise be applied for under the Resource Management Act 1991 (*RMA*); and
 - (ii) a wildlife approval, being lawful authority for an act that would otherwise be an offence under section 56(1) of the Wildlife Act 1953.
- (c) HDL is eligible to apply for the approvals under the RMA and the Wildlife Act 1953.⁴

² Fast-track Approvals Act 2024 (*FTAA*), section 42(1).

³ FTAA, section 42(4).

⁴ FTAA, section 42(3).

2.3 In relation to section 43 of the FTAA:

- (a) The substantive application for the Project includes the completed EPA substantive application form and will be lodged in the manner approved by the EPA.⁵
- (b) An explanation of how the Project is consistent with the purpose of the FTAA is included in section 8 of this Substantive Project Assessment.⁶
- (c) The Project does not involve any ineligible activities.⁷ Specifically, it does not include any aquaculture activities or activities that would occur on identified Māori land, Māori customary land or land set apart as Māori reservation; or within a customary marine title area or customary rights area. It does not include any other activities within the definition of an ineligible activity set out in section 5 of the FTAA.
- (d) If granted, the approvals will be held by HDL, being the authorised person for the Project.⁸
- (e) No information requirements were specified by the Minister in the Referral Notice. The substantive application for the Project includes all of the information required for a resource consent approval (set out in Schedule 5, clauses 5 – 9 of the FTAA) and for a wildlife approval (set out in Schedule 7 clause 2 of the FTAA).⁹
- (f) HDL has not applied for a determination under section 39 of the FTAA.¹⁰
- (g) The Project is not a priority project.¹¹
- (h) The substantive application for the Project has been made before the deadline for lodgement given in the Referral Notice of two years from 27 February 2026.¹²
- (i) The fees and levy payable in respect of the substantive application have been paid.¹³

2.4 In relation to section 44, the information required by section 43 for the substantive application (set out above) is provided in sufficient detail to satisfy the purpose for which it is required.

Section 46(2)(b) and (d)

2.5 The substantive application for the Project relates solely to Bangor Village, being a referred project under the FTAA.

2.6 The fees and levy payable in respect of the substantive application have been paid.

⁵ FTAA, section 43(1)(a).

⁶ FTAA, section 43(1)(b).

⁷ FTAA, section 43(1)(c).

⁸ FTAA, section 43(1)(d).

⁹ FTAA, section 43(1)(e).

¹⁰ FTAA, section 43(1)(f).

¹¹ FTAA, section 43(1)(h).

¹² FTAA, section 43(1)(i).

¹³ FTAA, section 43(1)(j).

3 A description of the proposed activity (clause 5(1)(a), Schedule 5)

Overview of the Project

- 3.1 The Project is the subdivision and development of the Site to enable the creation of a new residential neighbourhood on residentially zoned land immediately adjoining the existing township of Darfield.
- 3.2 The Project activities comprise:
- (a) Subdivision of the Site and associated land development (including earthworks) to create:
 - (i) 741 allotments to enable the establishment of 741 dwellings. Of those 741 allotments for dwellings, 545 will range between 594m² – 1,000m², while the balance will range between 1000m² and 1.1ha;
 - (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 that will be enhanced as part of the Project (the *Waterways*).
 - (c) Construction of associated infrastructure and utilities to support the new neighbourhood, including roading and pedestrian connections and three waters infrastructure.
- 3.3 All necessary resource consents for the Project are sought under the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (*NES-CS*), the Canterbury Land and Water Regional Plan (*LWRP*) and the District Plan. A list of the specific resource consents required to authorise the Project is set out in Table 1 below.
- 3.4 A wildlife approval to authorise the capture and relocation of lizards is also sought as part of this substantive application.
- 3.5 To support the construction of the dwellings on the allotments that will be created as part of the Project, land use consent is being sought through this substantive application to authorise potential non-compliances of future dwellings on the smaller allotments with the relevant site coverage and setback standards in the District Plan.

Project layout and design

- 3.6 Plans showing the overall Project and subdivision layout are included as **Attachment 1**. Landscape plans for the public realm areas including the green spaces are included in the Landscape Framework Report (**Attachment 2**).
- 3.7 The key concepts underpinning the design and layout of Bangor Village are described in the Urban Design Assessment (*UDA*) (**Attachment 3**) and the Landscape Framework Report.

3.8 In summary:

- (a) Accounting for the character of the surrounding environment and the directions of the relevant planning documents, the Site offers the opportunity to carefully introduce a more diverse range of residential lot sizes (including a more suburban typology) which will improve housing choice and affordability while also protecting and maintaining the rural residential character of land adjoining the Site (particularly to the north and west). To achieve that outcome:
 - (i) The largest lots (between 5000m² – 1.1ha) have been positioned at the boundaries of the Site which adjoin the General Rural zones (to the west and north of the Site).
 - (ii) Medium-sized lots (between 3500m² – 8,000m²) have been positioned along the southern and eastern boundaries, adjoining the largest lots on the western and north sides of the Site, to reflect a transition from a more rural residential character.
 - (iii) Smaller-sized lots (between 594 – 1000m²) have been positioned centrally within the Site, in closest proximity to the shared community green spaces.
- (b) The lots and streets are oriented to maximise sunlight access and views toward the Southern Alps and have been arranged coherently to prioritise connectivity to the open space network.
- (c) The existing features of the Site have also informed the design and layout of Bangor Village, including the Waterways which will be enhanced as part of the Project and the existing mature trees within the Site which will be central to the new green space network (described at paragraph 3.10 below).
- (d) In accordance with the District Plan's Outline Development Plan for the Site, Development Area – DA3 (*DEV-DA3*), and following consultation with the New Zealand Transport Agency Waka Kotahi (*NZTA*), two accesses to Bangor Village will be provided from Bangor Road / State Highway (*SH*) 77, with provision for a future connection through Cridges Road. No direct access to the Site from West Coast Road / SH 73 will be provided.

3.9 Consideration was given to including a dedicated lot for a future supermarket or commercial offering and/or a school.¹⁴ Through engagement with the community as part of preparing the substantive application, it became clear that the preference was, at this stage, to retain all commercial activities along the main street of Darfield. Consequently, the Project does not include any dedicated allotment for a supermarket or commercial offering. The Project also does not include any dedicated allotments for a school. The layout of the Project (and the road and residential block configurations in particular) has however been designed to accommodate a potential future school if the Ministry of Education wishes to establish a school within the Site.

Landscaping

3.10 The key landscape components for the Project are:

- (a) The landscaping proposed at the entrances to the Site from Bangor Road / SH 77.

¹⁴ The Referral Notice references the creation of allotments for future non-residential activities (which may include community and commercial activities, and a school).

- (b) The primary farm / park style reserve in the centre of the Site. The reserve has been organised around existing vegetation (much of which will be retained and enhanced). The southern portion of the reserve is an arboretum-style garden, where exotic and native trees form a sheltered setting for informal recreation. The northern portion of the reserve has a stronger ecological focus, with the existing water race realigned and planted with native riparian species to improve aquatic habitat and reinforce the natural character of the park. Sports facilities (including a tennis or multi purpose sports court and a cricket pitch) for wider public use will be provided within the reserve.
 - (c) Three smaller reserves, extending from Reserve 801 through the centre of the Site to create a linear reserve / green corridor that will accommodate a shared pedestrian walkway and cycleway and dedicated area for recreation and play.
 - (d) A neighbourhood reserve in the east of the Site will provide important amenity space for nearby residents and include dedicated spaces and facilities to enhance opportunities for social connection.
 - (e) Extensive planting throughout the streets and adjoining the Waterways.
- 3.11 The landscape concepts and key features of the entrances, reserves and street / waterway planting are set out in the Landscape Framework Report, along with the tree and planting palettes and cross sections.

Transport

- 3.12 The location of all new roading connections and access points is shown on the Subdivision Plans at Attachment 1.
- 3.13 The roading network for the Project will comprise:
- (a) Two new vehicle access points from Bangor Road / SH 77. These will include a carriageway widening, kerb and channel, asphalt surfacing to the centre line and street lighting. These access points are connected by a collector road (varying between 20m and 30m in width) that will form an integral part of the internal pedestrian and cycle network, while also being of sufficient legal width to accommodate any future public transport routes.
 - (b) A network of local roads throughout the Site, with carriageway widths varying from 8m – 11m (17m – 24m widths in total). Kerb and channel will be provided at all road intersections and around the Site perimeter wider roads will be formed with roadside swales.
 - (c) The upgrade of the 1.5m footpath along the southern side of Bangor Road to a new 2.5m width to create improved connectivity for pedestrians and cyclists between the Site and the existing Darfield township.
 - (d) Cycleway and pedestrian connections throughout the Site.
- 3.14 In addition, the Project includes the delivery of two upgrades to the wider roading network being the upgrade of the Bangor Road / McLaughlins Road intersection and, if required, the upgrade of the Bangor Road / SH 77 and West Coast Road / SH 73 intersection once more than 550 lots have been created within the Site.

Waters infrastructure

3.15 The infrastructure and services related aspects of the Project are addressed in the Infrastructure Assessment prepared by DLS (**Attachment 4**) and in the Engineering Plans included as **Attachment 5**.

3.16 In brief:

- (a) The soil conditions on the Site and the depth to groundwater allow for stormwater disposal to ground without the requirement for dedicated treatment (beyond what is provided through soakpits and swales).
 - (i) Stormwater from the roads, road berms and lot frontages will be managed through conveyance (via kerb and channel or roadside swales) to boulder backfilled soakpits designed to accommodate flows from roads within the Site up to a 1 in 50 year (2% Annual Exceedance Probability (*AEP*)) critical duration event. Flows over the 2% AEP event will be stored within the roadside swales or conveyed through secondary flow channels (being the roads and reserve links) to discharge at the pre-development locations.
 - (ii) The soakpit manholes will be fitted with submerged inlets to prevent floatable contaminants and rubbish from entering the soakpits. The depth of soakpits will be limited to 4m below ground level to allow the maximum amount of unsaturated material between the point of discharge and the highest recorded groundwater level while still achieving high infiltration rates to ensure function during more severe rainfall events.
 - (iii) Private soakpits servicing buildings and driveways will also be required to accommodate and dispose of a 2% AEP event of any duration up to and including 24 hours.
 - (iv) Consistent with the SDC Engineering Code of Practice, the overall stormwater network will be designed to ensure hydraulic neutrality up to a 1% AEP event. The operational stormwater infrastructure will vest with SDC.
- (b) At the request of Selwyn Water Limited (*Selwyn Water*), wastewater from the Site will be discharged via a low-pressure sewer system that will be constructed and connected to Selwyn Water's reticulated wastewater network which has recently been extended to Darfield. The low-pressure sewer system will comprise individual on-site pumping units on each lot that will discharge processed wastewater through service laterals to a rising main which will be constructed along Bangor Road as part of the Project. The rising main will connect the Site to the reticulated wastewater network connection point on the corner of Cardale Street and Telegraph Road. The maximum sewer flow from the Site has been calculated by DLS and falls well within the Selwyn Water allowance for the area in which the Site is located.¹⁵
- (c) Potable water supply servicing for the Project will be provided through connections from the Site to Selwyn Water's reticulated system which also has sufficient capacity to accommodate the anticipated flow demand. Water within the Project will be supplied by a reticulated pipe system located within the road berms.

¹⁵ Attachment 4, Infrastructure Assessment, at [5.2].

- (d) Power supply and telecommunications infrastructure will be available to service the Project through the extension of existing services into the Site.

Land development

Earthworks

- 3.17 The earthworks plans for the Project are included in the Engineering Plans at Attachment 5.
- 3.18 It is anticipated that approximately 190,000m³ of soil will need to be cut and filled to establish building lots and roading within the Site. A balance of cut and fill will be maintained on the Site (i.e. no material will need to be removed from Site unless it is contaminated or geotechnically unsuitable and no material will be imported to the Site). The maximum cut and fill depths across the Site will generally be less than 800m. The maximum depth of excavation for drainage works will be 4m for the soakpits.
- 3.19 The key intent of the earthworks design is to maintain the existing landform of the Site as much as possible to minimise soil disturbing activities and to maintain natural drainage patterns. The majority of the required earthworks will be within the road footprints and the central area of the Site where the smaller lots are located to create conveyance capacity and storage for stormwater and flood flows.
- 3.20 All earthworks will be carried out in accordance with the relevant NZS standards and will involve the stripping of topsoil to stockpile, followed by bulk cut and fill earthworks and the reinstatement of topsoil and grass. All disturbed topsoil will be sown with SDC specification grass seed mixes.
- 3.21 Following construction, additional earthworks will be carried out to level and finish sites to ensure they will drain towards the streets.
- 3.22 Environment Canterbury's (*ECan*) Erosion and Sediment Control Guidelines will be followed during periods of earthworks and dust nuisance will be kept to a minimum and will accord with the Erosion and Sediment Control Plan (*ESCP*) (which includes a Dust Management Plan (*DMP*)) (condition 32, Proposed SDC Conditions, **Attachment 6**; condition 12, Proposed ECan Conditions (Construction Phase Stormwater), **Attachment 7**). A draft ESCP is included as **Attachment 8**.

Construction stages

- 3.23 The construction of the Project will progress in stages as generally described in Schedule 2 of the Proposed SDC Conditions.
- 3.24 The construction sequence for each stage will involve:
- (a) Planning the methodology and timing of land disturbance to minimise erosion and sediment generation and to account for any requirements relating to contamination remediation and/or the management of any ecological features on the Site (including birds and lizards).
 - (b) Constructing temporary soakage pits and bunds/channels to ensure potential stormwater run-off is appropriately directed to the soakage pits.
 - (c) Strip and stockpile topsoil from the construction area and undertake bulk earthworks, followed by re-topsoiling and grassing of the sites.

- (d) Trenching and installation of buried services.
- (e) Excavating and constructing kerb and channel, completing pavement in roading areas, constructing berms to required levels and re-sowing berm areas.
- (f) Undertaking planting and landscaping of reserve areas.

3.25 Once the allotments within each stage have been formed and roading, services and reserves have been established, construction of the dwellings will commence.

Approvals sought under the FTAA

3.26 All necessary resource consents are sought for the Project, including:

Activity	Rule reference	Status
<i>National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011</i>		
Subdividing the Site where it is not a permitted or controlled activity under regulation 8 or 9, and a detailed site investigation confirms that the soil contamination in certain parts of the Site exceed the applicable standards in regulation 7 and conditions will be complied with.	Regulation 10(2)	Restricted discretionary.
Disturbing soil on the Site where it is not a permitted or controlled activity under regulation 8 or 9, and a detailed site investigation confirms that the soil contamination in certain parts of the Site exceed the applicable standards in regulation 7 and conditions will be complied with.	Regulation 10(2)	Restricted discretionary.
<i>Canterbury Land and Water Regional Plan</i>		
Discharge of construction-phase stormwater onto land where a contaminant may enter groundwater or surface water and the conditions of Rule 5.94 are not complied with.	Rule 5.94B	Restricted discretionary.
Discharge of operational-phase stormwater onto land where a contaminant may enter groundwater or surface water.	Rule 5.93	Restricted discretionary.
Excavation over an unconfined or semi-unconfined aquifer where the conditions in Rule 5.175 are not complied with.	Rule 5.176	Restricted discretionary.

Selwyn District Plan		
<u>Part 2 – SUB – Subdivision</u>		
Subdivision in the LLR zone where it does not comply with the minimum average net site area, the minimum net site area.	SUB-R1 SUB-REQ1.1 SUB-REQ1.2	Non-complying.
Subdivision in the LLR zone where it does not comply with aspects of the ODP DEV-DA3.	SUB-R1 SUB-REQ3.1(a)	Discretionary.
Subdivision in the LLR zone where some lots will not comply with the minimum road frontage width requirement of 30m.	SUB-R1 SUB-REQ4	Restricted discretionary.
Subdivision in the LLR zone where some blocks will not comply with the maximum side block length of 250m.	SUB-R1 SUB-REQ7(1)(c)	Restricted discretionary.
Subdivision within the Plains Flood Management Overlay.	SUB-R17	Restricted discretionary.
Subdivision within the State Highway and Railway Network Noise Control Overlays.	SUB-R26	Discretionary.
<u>Part 2 – EW – Earthworks</u>		
Earthworks directly associated with the development of land for subdivision where the maximum area of land subject to works exceeds 1,000m ² .	EW-R5A.2	Restricted discretionary.
<u>Part 3 – LLRZ – Large Lot Residential zone</u>		
Fencing that exceeds the permitted height limits.	LLRZ-R6	Restricted discretionary.
Residential units that exceed the building coverage and setback rule requirements.	LLRZ-R2(2) LLRZ-REQ(2) LLRZ-REQ(5)	Discretionary.
<u>Part 2 – TRAN – Transport</u>		
Land transport infrastructure works or activities within a land transport corridor which do not comply with the maximum carriageway widths for the existing Large Lot Residential zone.	TRAN-R1 TRAN-REQ19	Discretionary

Establishment of a vehicle crossing on an arterial road where the posted speed limit is 60km/hr or more and the minimum sight distance from the vehicle crossing (45m) is not complied with.	TRAN-R4(5) TRAN-REQ2.1 TRAN-REQ4.1(c)	Restricted discretionary.
Creation of land transport corridors which do not comply with the maximum width (10m).	TRAN-R2	Discretionary.

Table 1: Resource consent requirements

3.27 Overall, the resource consents for the Project are assessed as a **non-complying activity**, noting that section 104D of the RMA does not apply to an assessment of the resource consents under the FTAA.

3.28 A wildlife approval is sought to authorise the capture and liberation of lizards for the purpose of liberating them at a lizard release site which would otherwise be an offence under section 56(1) of the Wildlife Act 1953. Approval is also sought under section 53 of the Wildlife Act 1953 for the incidental killing of lizards associated with the capture and liberation of lizards.

4 A description and map of the Site on which the activity is to occur (clause 5(1)(b), Schedule 5)

The Site

4.1 The Site is located at 160 Bangor Road in the north-western corner of the Darfield township, as shown in Figure 3 below, and is approximately 130.39ha in size.

4.2 The Site comprises two lots (described in Table 2) and is bound by SH 73 (the Great Alpine Highway) to the north-east (which bisects the Darfield township towards the east) and SH 77 / Bangor Road to the south, which runs west out of Darfield. Currently, vehicle access to the Site is provided off Bangor Road.

Address	Legal Description	Freehold Title
160 Bangor Road	Section 2 SO 438579	548760
N/A	Lot 2 DP 81020	CB47A/153

Table 2: The legal description of the Site.



Figure 1: Lots that comprise the Site.

- 4.3 For the purposes of clause 5(1)(b), Schedule 5 of the FTAA, the Site is not within or adjacent to a statutory area, ngā rohe moana o ngā hapū o Ngāti Porou, or a protected customary rights area.

Topography and Site features

- 4.4 The topography of the Site is relatively flat and level, with a gentle crossfall from north to south. The maximum variation in ground level is approximately 9m over the 1200m Site length from the northern boundary to Bangor Road / SH 77. As set out in the Geotechnical and Natural Hazard Assessment (**Attachment 10**), the Site is underlain by Late Pleistocene sediments, consisting of un-weathered, variable brownish-grey gravels, sand, silt and clay in low river terraces.¹⁶ Gravel layers within the Site continue to at least 265m depth.
- 4.5 ENGEO concludes that the Site generally meets the “good ground” classification as defined in the NZS 3604:2011,¹⁷ meaning that the Site has a bearing capacity that will generally not require specific geotechnical engineering design to accommodate dwellings.
- 4.6 The Site is currently used for agriculture/farming purposes and accommodates one main homestead and ancillary buildings within the Site.
- 4.7 The existing vegetation is comprised of shelterbelts and mature residential planting around the homestead, and a shelterbelt extending along the Site boundary with Bangor Road. As described in the Landscape Report, there is a large grove of *Eucalyptus* trees located near the homestead, which will largely be retained as part of the Project.

Water races

- 4.8 There are no natural surface watercourses within the Site or immediate area of the Site.
- 4.9 The Waterways, being two branches of an irrigation water race which forms part of the Malvern irrigation network managed by SDC, intersect the Site as shown in Figure 2. The main branch which runs from the north of the Site through the Bangor Road is referenced in this application

¹⁶ Attachment 10, Geotechnical and Natural Hazard Assessment, section 3.2.

¹⁷ Attachment 10, Geotechnical and Natural Hazard Assessment, section 8.2.

as Waterway 1. The smaller branch extending from West Coast Road / SH 73 is Waterway 2. The water within the irrigation network (including the Waterways) is sourced from surface water intakes on the Kowhai River.



Figure 2: Existing Waterways

- 4.10 The ecological health and values of the Waterways have been assessed by Aquatic Ecology Limited (AEL) (Aquatic Ecology Assessment, **Attachment 11**).
- 4.11 Based on the surveys and sampling undertaken, AEL conclude that the current health of Waterway 1 and Waterway 2 is poor, with low ecological values overall. Following significant survey efforts, the only fish species identified in the Waterways was the upland bully (*Gobiomorphus breviceps*). This species is indigenous to New Zealand and has a conservation status of "At Risk – Naturally Uncommon", however despite this status it is frequently observed in the surrounding area and wider Canterbury region.¹⁸

Terrestrial ecology

- 4.12 The ecological values of the Site have been assessed by Effects Management Ecology Ltd (EME) in the Terrestrial Ecological Impact Assessment (TEcIA) included as **Attachment 12**.
- 4.13 Using a combination of desktop assessments and on-site surveys, the TEcIA confirms that:¹⁹
- (a) The Site supports a range of exotic and common native bird species while also providing some foraging and/or nesting habitat for some 'Threatened' and 'At Risk' indigenous species. For the majority of those 'Threatened' and 'At Risk' indigenous species (including the Eastern falcon/karearea ('Threatened – Nationally Vulnerable')), the foraging and/or nesting habitat provided by the Site is limited. For the New Zealand pipit/pihoi and the South Island pied oyster catchers / tōrea tuawhenua (both 'At Risk – Declining'), the Site offers more foraging and/or nesting opportunities (albeit the use of the Site for nesting of those species is still considered 'Possible' rather than 'Likely' or 'Highly Likely'). Overall, the bird community on-site is considered by EME to be 'low' value.
 - (b) The Canterbury grass skink/mokomoko ('At Risk – Declining') is present on the Site while the southern grass skink/mokomoko ('At Risk – Declining') and McCann's skink (Not Threatened) are recorded as having a 'Possible' presence on the Site. The majority

¹⁸ Attachment 11, Aquatic Ecology Assessment, at page 5.

¹⁹ Attachment 12, Terrestrial Ecology Impact Assessment, at pages 20 - 78.

of the skinks caught as part of the on-site surveys were however captured beyond the Site boundary on the road reserves along SH 77 and SH 73. The two 'At Risk – Declining' lizards have a 'High' ecological value.

- (c) The existing flora on the Site is dominated by high producing exotic grassland with limited areas of exotic forestry and some existing planting (including some domestic native planting) around the existing dwelling on the Site. As a crop-rotation farm, the Site is also highly dynamic, with grazing and tiling of vegetation on Site often occurring within the same month. Because the exotic grassland within Site potentially provides foraging and/or nesting habitat to 'At Risk – Declining' bird species, that habitat is potentially 'significant' under the CRPS criteria (discussed further below). EME's assessment however is that that classification is not warranted given the impacts of existing farming activities on the grassland.
- (d) No bats or indigenous frogs are present on the Site.
- (e) There are no vegetation communities on the Site that would meet the definition of the *natural inland wetland* in the National Policy Statement for Freshwater Management 2020 (NPS-FM).²⁰

Groundwater and bores

- 4.14 Based on bore log information and ECan modelling, ENGEO considers that groundwater would be encountered approximately 50m - 100m or deeper below ground level.²¹
- 4.15 Two ECan Bores with logs are located in the vicinity of the Site, with one bore located within the Site boundary and the other located immediately outside the Site. As identified in the Geotechnical and Natural Hazard Assessment:²²
 - (a) The bore within the Site is located in the central-western area and was drilled to 265m depth in 1985.²³ Groundwater was recorded at 105m depth.
 - (b) The bore located in the SDC-owned neighbouring property to the north of the Site and was drilled to 245m depth in 2013.²⁴ Groundwater was recorded at 135m depth.

The surrounding environment

Proximity and features

- 4.16 The Site is located approximately 20 minutes inland from Rolleston and 45 minutes from central Ōtautahi Christchurch. Within the more immediate surrounds, the Site is located in close proximity to a variety of amenities and services, including:
 - (a) Open space (informal recreation) to the east of the Site, including McHugh's Forest Park, Darfield Reserve, the Darfield pump track, Darfield Tennis Club, Darfield Recreation Centre (including netball and squash courts) and Darfield Cricket Club.
 - (b) Darfield town centre, located between 1.5 – 2km to the east of the Site, which features local shops, a supermarket, restaurants and cafes.

²⁰ National Policy Statement for Freshwater Management 2020, clause 3.21.

²¹ Attachment 10, Geotechnical and Natural Hazard Assessment, section 6.2.

²² Attachment 10, Geotechnical and Natural Hazard Assessment, section 3.3.1.

²³ L35/0277.

²⁴ BX22/0006.

- (c) Schools, including Darfield High School and Darfield Primary School located to the south and east of the Site.
- (d) Public transport – bus route 86 operates an express service between Darfield and Christchurch in the mornings and the afternoons, Monday to Friday.
- (e) Water supply – Darfield’s water treatment plant is located on the notch of land on the north-western boundary of the Site.

4.17 There are five active wells within a 1km radius of the Site. These wells are predominantly used for domestic supply, irrigation, public water supply and water observation level purposes.

Character

4.18 The wider Darfield neighbourhood is an established and growing community with predominantly one storey detached housing.

4.19 As discussed further in this Substantive Project Assessment and in the UDA, the town is growing in a radial structure around the intersection of West Coast Road / SH 73 and Bangor Road / SH 77 and its town centre. Darfield’s character is typical of small towns in the Selwyn District, which is derived primarily from its history as a service town for the wider farming area and its function as a railway junction and gateway to the Southern Alps. The character of Darfield’s residential areas is mixed, comprising older neighbourhoods with spacious sections, large lot rural residential areas with rural roads and newer subdivision with smaller sections).²⁵ As illustrated in Figure 3 below, the key community facilities within Darfield are primarily concentrated to the west of the town centre, toward the Site.

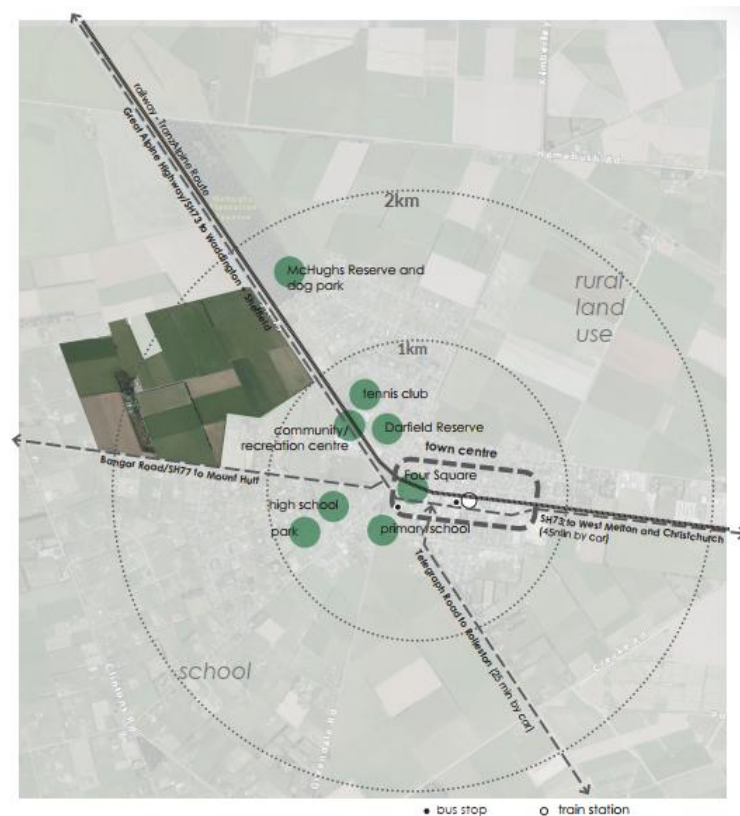


Figure 3: Site accessibility to nearby amenities and services, prepared by Urban Acumen.

Zoning

- 4.20 The Site is zoned Large Lot Residential (*LLR*) under the District Plan, as shown in yellow on Figure 4 below. The LLR aims to provide the opportunity for people to enjoy a “spacious living environment while also being close to an urban centre”.²⁶ It also seeks to provide for “a transition to the surrounding rural areas of a township” through enabling residential activity “on large sites in a manner compatible with the retention of an open and spacious peri-urban character at the rural interface.”²⁷
- 4.21 The Site is also subject to an Outline Development Plan (*ODP*) in the District Plan (being DEV-DA3), which identifies key features for guiding the development of the Site (refer Figure 5 below).
- 4.22 The LLR zone extends over the properties to the south of the Site across Bangor Road / SH 77. The rural lifestyle properties to the immediate west of the Site are zoned General Rural. The farmland to the immediate north of the Site is also zoned General Rural but is subject to an Urban Growth Overlay (shown in blue on Figure 4 below). Across West Coast Road / SH 73 to east of the Site, the properties are zoned LLR and General Residential.

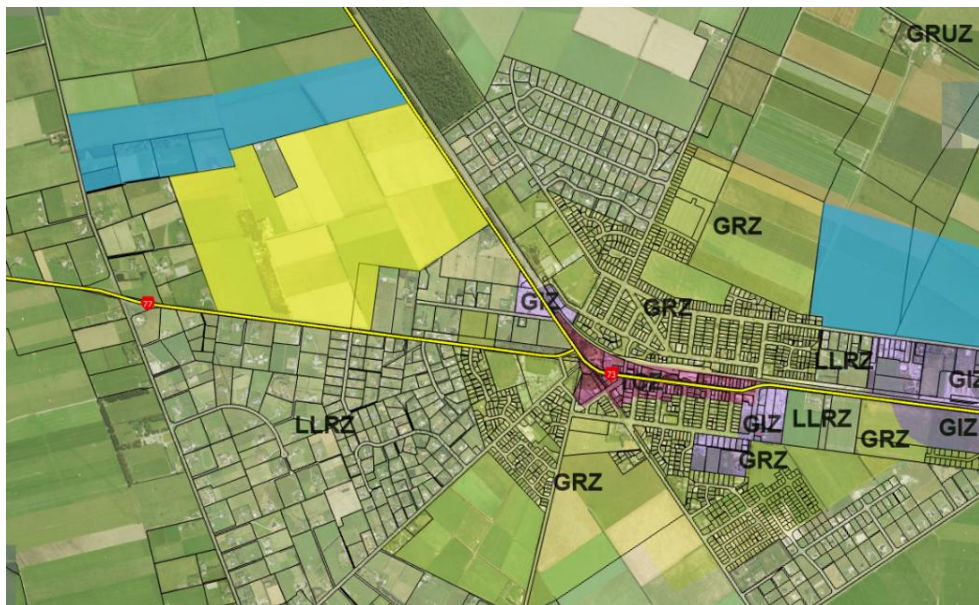


Figure 4: The zoning of the Site (in yellow) with the urban growth overlays (in blue).

²⁶ Partially Operative Selwyn District Plan (*District Plan*), Part 3 – Residential Zones – Large Lot Residential Zone, LLRZ-Overview.

²⁷ District Plan, Part 3 – Residential Zones – Large Lot Residential Zone, LLRZ-Overview; LLR-O1.



Figure 5: Outline Development Plan DEV-DA3

Anticipated development outcomes

- 4.23 Subdivision in the majority of the Residential zones is a restricted discretionary activity, subject to compliance with the relevant standards. For the LLR zone, those standards include:²⁸
- (a) A minimum average net site area of 5,000m².
 - (b) A minimum net site area 3,000m².
- 4.24 Subdivision of the Site in accordance with these standards would yield approximately 182 lots (discounting use of approximately 30% of the Site for reserves and roading). DEV-DA3 also applies a series of density standards across the Site which, if complied with, would yield approximately 130 lots (with infrastructure to accommodate future intensification).
- 4.25 The construction of one residential unit on a site is a permitted activity in the LLR zone, subject to compliance with the applicable standards which include maximum building coverage, maximum building height and setbacks from roading and internal boundaries.²⁹ Without

²⁸ District Plan, SUB-R1.

²⁹ District Plan, LLRZ-R1.

further subdivision of the Site, one additional residential unit could be established on the Site as a permitted activity (noting there is already a principal residential unit existing on the Site).

- 4.26 In summary, if further subdivision of the Site was to occur in accordance with the LLR zone and DEV-DA3 standards, an additional 130 - 182 residential units could be established as permitted activities on those created allotments. As discussed further below, this scenario has been considered as part of the Integrated Transport Assessment (ITA) (**Attachment 13**) but has not been relied on to discount any effects of the Project (noting that further subdivision of the Site is not permitted and would require resource consent).

5 Each owner and occupier of the Site and land adjacent to the Site (clauses 5(1)(d) and 5(6), Schedule 5)

- 5.1 The owner of the Site is HDL. HDL's postal address is PO Box 848, Christchurch 8140, New Zealand. HDL's physical address is 21 Worcester Boulevard, Christchurch 8013.

- 5.2 **Attachment 14** sets out the full name and address of:

- (a) Each owner of land adjacent to the Site.³⁰
- (b) Each occupier of land adjacent to the Site whom HDL has been able to identify after reasonable inquiry.

- 5.3 To inquire about the name and addresses of each occupier of land adjacent to the Site, representatives from HDL identified each adjacent land parcel and hand-delivered letters to each of the properties requesting that their contact details be provided (letter included as Appendix A to Attachment 14). As described in Attachment 14, letters could not be delivered to three of the properties because no letterboxes or recipients for those properties could be identified.

- 5.4 At the time of lodgement, nine responses have been received from owners and/or occupiers of those properties. Any further responses received by HDL will be provided to the Panel.

6 A description of any other activities that are part of the Project (clause 5(1)(e), Schedule 5)

- 6.1 Other activities that are part of the Project include the construction of dwellings on each of the allotments to be created by the Project. As discussed in section 7, those dwellings will be constructed by HDL or another development partner.

7 A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the Project (clause 5(1)(f), Schedule 5)

- 7.1 As part of this substantive application, land use consent is being sought to authorise non-compliances of future dwellings on the smaller allotments with the building coverage and setback rule requirements which apply in the LLR zone. The smaller allotments are those with a net site area of 3000m² or less and/or with a road frontage width of less than 35m and are referenced in the Proposed SDC Conditions as the *Qualifying Allotments*.

- 7.2 If the future dwellings on the Qualifying Allotments do not comply with any other permitted standards in the LLR zone, then an additional resource consent to authorise those non-

³⁰ Details of property owners have been obtained from GRIP online property information database.

compliances will be required and will be sought at a later stage through a separate process under the RMA (or its replacement).

- 7.3 For all other allotments created by the Project (other than the Qualifying Allotments), future dwellings are intended to be established in accordance with the permitted activity rule requirements for residential units in the LLR zone. If those dwellings do not comply with the permitted activity rule requirements, resource consent to authorise those non-compliances will be sought at a later stage through a separate process under the RMA (or its replacement).

8 Assessment of the Project against the purpose of the Fast-track Approvals Act 2024 (section 43(1)(b))

- 8.1 The purpose of the FTAA is to facilitate the delivery of projects with significant regional or national benefits. Importantly, that purpose is not merely achieved through the accelerated “one stop shop” nature of the FTAA process. The directive in the FTAA purpose is on facilitating the delivery of the projects themselves.³¹

- 8.2 Granting the approvals sought for the Project will achieve that purpose. As set out below, the Project has significant regional benefits and, for the following reasons, granting the approvals will also enable timely delivery of the Project:

- (a) HDL is a well-established development company with over 40 years’ experience delivering high-quality residential neighbourhoods throughout New Zealand, and particularly within the Selwyn district. In recent years, it has developed a strong track record of moving swiftly to meet its commitments in implementing resource consents granted under fast-track consenting processes. By way of example, HDL secured resource consents for 970 lots at Faringdon South West and South East under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (*COVID Act*). Within 16 months of receiving those consents, all lots and supporting infrastructure were established, and almost all lots had been sold. HDL then obtained resource consent in mid 2023 for Faringdon Oval, being a second residential development under the COVID Act comprising 1,146 lots and supporting infrastructure. Construction of that development commenced in November 2023. As at the date of this application, the majority of the infrastructure is now established and approximately 500 homes have been completed or are currently under construction. A further 240 lots have been sold and construction of dwellings on those lots is due to begin shortly.
- (b) Over the years of its operation, HDL has built long-standing relationships with its construction partners and its consultant teams who work together in the planning and preparation for construction, and who oversee the implementation of the resource consents. With construction for HDL’s latest development (also authorised under the COVID Act) progressing faster than expected, HDL’s construction partners are well-placed to transition their teams to the Site to begin construction on Bangor Village shortly after approvals sought by this application are granted.
- (c) HDL’s funding arrangements along with its ownership of the Site mean it will be able to progress construction of the Project without delay, subject to receiving approvals under the FTAA.

- 8.3 Expert panels for other FTAA projects have confirmed that the criteria outlined in section 22 of the FTAA provide useful guidance on whether a project has significant regional or national

³¹ Fast-track Approvals Bill, as reported from the Environment Committee, 22 October 2024, at page 3; <https://selectcommittees.parliament.nz/view/SelectCommitteeReport/087dc74e-66d5-4699-84c7-08dcf2022ae4>, accessed 22 May 2026.

benefits, and the extent of those benefits for the purposes of assessing a substantive application.³² An assessment of the Project against the relevant section 22 criteria is set out below.

Bangor Village will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (section 22(2)(a)(iii))

Increase the supply of housing and address housing needs

- 8.4 The Project will significantly increase the supply of housing in the Canterbury region, enabling the delivery of 741 new homes within the Darfield township. That represents a net increase in the total housing capacity within Darfield over the medium term of a substantial 18-21%, which will meaningfully contribute to maintaining the relative affordability of housing in this part of the Canterbury region.³³
- 8.5 As discussed further below, the proposed lot sizes will enable a diverse range of housing typologies to meet different housing needs in this part of Canterbury.

Contribute to a well-functioning urban environment

- 8.6 Policy 1 of the NPS-UD includes a list of attributes which make urban environments “well-functioning”. The part of the Canterbury region in which the Site is located does not meet the definition of an “urban environment” under the National Policy Statement on Urban Development 2020 (NPS-UD), however the attributes set out in Policy 1, along with the relevant District Plan directions and best practice urban design principles, have informed the design and layout of the Project and its relationship to the existing township in various ways, as discussed below.³⁴

...have or enable a variety of homes that meet the needs, in terms of type, price and location, of different households and enable Māori to express their cultural traditions and norms

- 8.7 The Project will significantly increase the supply of housing in the Canterbury region and will increase the range of available typologies more generally – offering a lower, more spacious density than currently available in Rolleston and other larger urban centres, and a higher density than currently enabled on the Site. This will provide increased choice and affordability for smaller households or existing residents in Darfield looking to downsize while remaining connected to the township. It will also provide choice for those wanting to reside in this part of Canterbury, but who are priced out of the Rolleston or Lincoln market.
- 8.8 The Project has been designed to account for the feedback received to date from Mahaanui Kurataiao Limited (MKT) on behalf of Te Taumutu Rūnanga and Whitiara Centre Limited (Whitiara) on behalf of Te Ngāi Tūāhuriri Rūnanga (the *Rūnanga Representatives*). Te Taumutu Rūnanga and Te Ngāi Tūāhuriri Rūnanga are mana whenua in relation to area in which the Site is located. In that regard, the Project will be delivered in a manner which seeks to recognise and align with matters of importance to mana whenua.

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

³² Decision of the Expert Consenting Panel for Maitahi Village at [514]-[515]; Decision of the Expert Consenting Panel for Ryans Road Industrial Development at [834]; and Decision of the Expert Consenting Panel for the Wellington International Airport Seawall at [363].

³³ Attachment 15, Economic Assessment Update, Appendix – Economic Impact Assessment, at [3.1.2].

³⁴ Attachment 3, UDA, at [2.1].

- 8.9 Supporting accessibility and connectivity has been a key driver of the Project's design and layout. The Site itself comprises the majority of the north-west quadrant of the existing Darfield township, centred around the intersection between West Coast Road / SH 73 and Bangor Road / SH 77. Completion of the Project will therefore contribute to a compact concentric urban form as anticipated by relevant planning documents, including the Malvern 2031 Area Plan with respect to Darfield in particular.³⁵
- 8.10 As the Site is a large landholding with one owner (HDL), a master-planned approach to development of the Site will avoid future ad hoc subdivision which may otherwise occur with larger lot sizes of the kind envisaged by the LLR zoning and the ODP. Such subdivision could result in fragmented street networks, inefficient infrastructure provision, incoherent street frontages, and a proliferation of rear lots which ultimately impedes the ability to achieve a connected and legible suburban environment. Instead, as set out in the UDA, the Project will enable an integrated and connected neighbourhood.
- 8.11 The proximity of the Site to the township and to other major employers in this part of Canterbury ensures excellent access to jobs, community services and natural and open spaces. Pedestrian and cycleways within the Site will provide active transport connections for residents to the proposed green space network that will be centrally located within the Site around the existing water race to be enhanced as part of the Project. Road layouts and widths within the Site have been designed to ensure that they will not preclude future public transport routes from being established. As part of the Project, the existing footpath along Bangor Road that connects the Site to the existing Darfield township will be upgraded to improve pedestrian and cycle accessibility.

...support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets

- 8.12 The Project will deliver a net increase on the total housing capacity in Darfield over the medium term of 18 – 21%. The Economic Impact Assessment (included as an Appendix to the Economic Assessment Update, **Attachment 15**) confirms that this substantial increase will make a significant contribution to supporting a competitive housing market and maintaining relative housing affordability in this part of the Canterbury region.³⁶

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

- 8.13 In the New Zealand context, the effects of climate change will be most acutely experienced in areas that are susceptible to sea-level rise and natural hazard risk, particularly flooding. Sea-level rise is not an issue for the Project, given its location. The Site is not in a high flood hazard area (according to the SDC mapping). Flood modelling undertaken by SDC does however indicate that parts of the Site (along with the vast majority of the Selwyn district) may be affected by a 1 in 200-year (or 0.5% AEP) flood event and a 1 in 500-year (0.2% AEP) flood event.³⁷
- 8.14 In response, the stormwater management infrastructure within the Project will be designed to accommodate flood flows up to and including the 2% AEP event and to achieve hydraulic neutrality for events up to and including the 1% AEP event. Flood flows exceeding those events will be stored in roadside swales and will be directed away from the future dwellings through secondary flow channels along the roads. The Project will also ensure that all dwellings within the Site are constructed to achieve a finished floor level with at least 300mm

³⁵ Attachment 3, UDA, at page 66.

³⁶ Attachment 15, Economic Assessment Update, at [36].

³⁷ Selwyn District Council, Selwyn's flooding and coastal hazards, Flooding map, <https://apps.canterburymaps.govt.nz/SelwynNaturalHazards/>.

clearance above the 0.5% (1 in 200 year) AEP event, consistent with the requirements of the Canterbury Regional Policy Statement 2016 (CRPS).³⁸

- 8.15 With those measures in place, the new homes enabled through the Project will be resilient to the current and likely future effects of climate change.

Bangor Village will deliver significant economic benefits (section 22(2)(a)(iv))

- 8.16 The Economic Assessment Update identifies that the Project will deliver the following significant economic benefits and impacts:

- (a) Significantly increasing the housing supply in Darfield to help meet housing needs and support a more competitive housing market generally, and a more competitive greenfield low-density market specifically, in the short-medium term.³⁹
- (b) Supporting the supply of more affordable housing (to buy and rent) relative to status quo planning provisions in the short-medium term in a district facing steady increases in median house prices and mean rents.⁴⁰
- (c) Generating at least \$458 million of total direct, indirect and induced value added for the regional economy⁴¹ and sustaining:⁴²
 - (i) approximately 119 full-time equivalent (FTE) jobs (on average) associated with design, infrastructure upgrades and civil construction over an 8.5-year delivery period; and
 - (ii) approximately 273 FTE jobs (on average) associated with building construction over a 10-year delivery period.
- (d) Contributing to a well-functioning urban environment by encouraging higher density development/intensification in the short-medium term (i.e. more efficient use of the land resource relative to the status quo planning provisions) in a location where households will have good accessibility to employment (including agricultural and agricultural product processing jobs), shops and services, schools, recreation and open space.

Bangor Village will support primary industries (section 22(2)(a)(v))

Support for primary industries

- 8.17 As outlined in the Economic Impact Assessment, primary industries are a key part of Canterbury's economy, as one of the highest value contributors to the GDP of the region. Canterbury is New Zealand's largest agricultural region by GDP, contributing 20% of the country's total agricultural output. Dairy product manufacturing in particular is consistently the highest value export from Canterbury (approximately \$4bn in 2021).⁴³ Food and fibre

³⁸ Attachment 6, Proposed SDC Conditions, condition 20.

³⁹ Attachment 15, Economic Assessment Update, at [44] – [46]; Appendix – Economic Impact Assessment, at [3.2].

⁴⁰ Attachment 15, Economic Assessment Update, at [44] – [46]; Appendix – Economic Impact Assessment, at [3.2].

⁴¹ A net present value of \$272 million at an 8% discount rate.

⁴² Attachment 15, Economic Assessment Update, at Table 2A.

⁴³ Environment Canterbury, *Economy, jobs and trends*, Figure 2, <https://www.ecan.govt.nz/your-region/plans-strategies-and-bylaws/what-we-know/regional-overview/economy-jobs-and-trends>.

export revenues are expected to reach \$59.6b in the year through to 30 June 2025 and strong growth is forecast to continue.⁴⁴

- 8.18 Within that context, the township of Darfield – and the Site in particular – is ideally situated to provide additional accommodation to support the ongoing growth of primary industries in the Canterbury region. The township is surrounded by working farms and is located in close proximity to the Fonterra Dairy Factory (a six-minute drive from the Site).
- 8.19 HDL has engaged with Fonterra in relation to the Project in recognition of its role as a key employer in Darfield. One of Fonterra's wastewater irrigation farms is also located approximately 500m to the north of the Site, separated by the General Rural zoned property which is subject to an Urban Growth Overlay in the District Plan (refer Figure 6 – the Overlay is shown in blue dash) (*Northern Farm*).

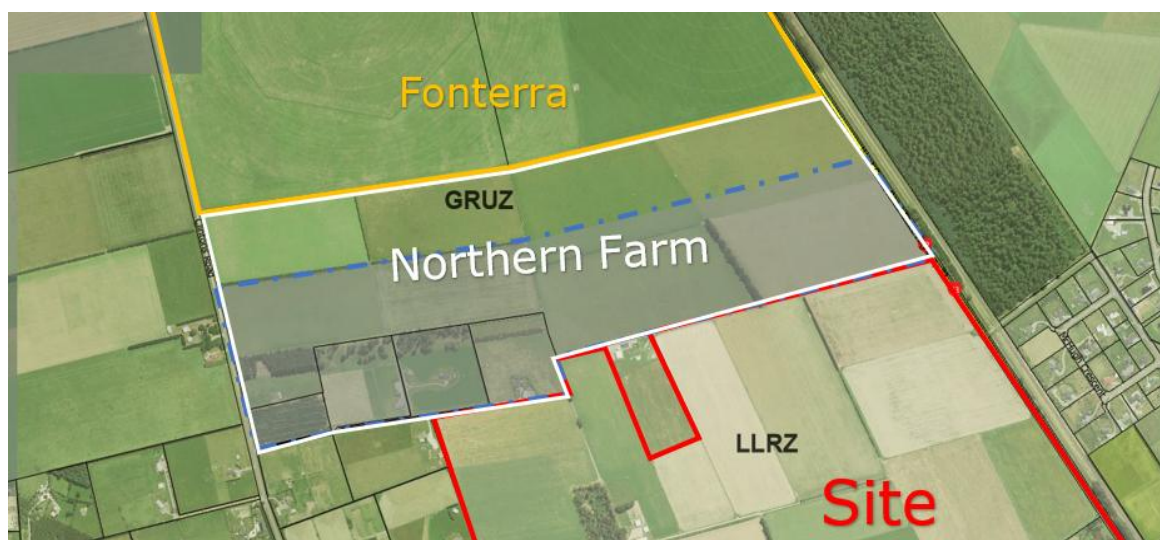


Figure 6 – Northern Farm / Fonterra site

- 8.20 In recognition of Fonterra's interests:
- (a) No direct road connections are proposed from the Site to the Northern Farm. In recognition of the Urban Growth Overlay which applies to the Northern Farm, the potential for future connections has been preserved through the identification of no-build areas on two of the lots along the northern boundary of the Site. If the Northern Farm is not rezoned for urban purposes in future then the no-build constraints will be removed from those lots because those future connections will no longer be required.
 - (b) Fewer, larger lots (which more closely align with the Site's LLR zoning) have been located along the northern boundary to reflect the existing rural character of the property to the north.
- 8.21 As set out in the letter provided by Fonterra (including as Appendix A to of Attachment 16), these initiatives will assist in mitigating potential reverse sensitivity effects on its primary production activities.
- 8.22 Additional housing in this key area of the Canterbury region will increase the opportunity for workers in primary industry to live closer to their workplaces and to find suitable and affordable accommodation. It will also reduce commuting times and consequential costs for

⁴⁴ Ministry for Primary Industries, *Situation and Outlook for Primary Industries*, June 2025.

workers (compared to Rolleston), which will increase the appeal of employment in primary industries. Furthermore, increasing housing supply on land already zoned for that purpose will mean that more productive land in the Canterbury region is preserved for other uses including primary production.

- 8.23 In these ways, the Project will have a positive impact on primary industry within the Canterbury region.

Bangor Village will support climate change adaption, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards (section 22(2)(a)(viii))

- 8.24 Geotechnical analysis undertaken for the Project confirms that the Site is not subject to risks associated with erosion, land instability or liquefaction and is suitable for residential development.⁴⁵
- 8.25 As outlined in paragraph 8.14 above, the Project includes specific initiatives to reduce risks arising from flood hazards which could affect the Site. In developing those initiatives, specific consideration has been given to the principles for adaptive action outlined in the National Adaption Plan 2022-2028; in particular:
- (a) HDL has engaged with local government and with the Rūnanga Representatives in relation to the Project and its resilience to natural hazards. The way in which HDL has responded to feedback is set out in the Affected Party Engagement Register (**Attachment 16**) and the Response to Rūnanga Recommendations (**Attachment 17**) (Principle 5).
 - (b) HDL has taken a proactive, long term approach to climate adaptation by designing the Project to achieve hydraulic neutrality up to a 1% AEP event and by ensuring resilience of future dwellings to flood events up to a 0.5% AEP event (Principle 1 and 2). That approach has been informed by a reliable evidence base, including the flood hazard information provided by ECan and the technical analysis undertaken by DLS (Principle 8).
 - (c) The proposed approach to managing stormwater and overland flows has sought to work with the topography of the Site and the way in which those flows currently move through the Site. The Project also will also retain and enhance key ecological features within the Site and includes extensive riparian planting throughout the green space and public realm areas. In that regard, the Project will work with nature (Principle 9).

Bangor Village is consistent with local or regional planning documents, including spatial strategies (section 22(2)(a)(x))

- 8.26 As addressed in section 10 below, the Project is consistent with, and will help achieve, the vast majority of relevant directions within the applicable local and regional planning documents.
- 8.27 The overall density of the Project is higher than what is contemplated by the LLR zone in the District Plan. As discussed below however, the applicable spatial strategies, along with directions within the CRPS and the District Plan itself, provide strong support for realising a higher density in this location.

⁴⁵ Attachment 10, Geotechnical and Natural Hazard Assessment, section 4.

9 Assessment of the Project against sections 5, 6 and 7 of the Resource Management Act 1991 (clause 5(1)(g), Schedule 5)

9.1 The purpose of the RMA is to promote the sustainable management of natural and physical resources. "Sustainable management" in that context means:

managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—

- a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and
- c) avoiding, remedying or mitigating any adverse effects of activities on the environment.

9.2 Granting resource consents for the Project will promote the sustainable management of natural and physical resources. The Project involves the use, development and protection of natural and physical resources (including the Site's land resource and its various natural features) to deliver a new neighbourhood within Darfield that will enable people and communities to provide for their wellbeing, while also achieving the criteria set out in (a) – (c) of the "sustainable management" definition.

9.3 In achieving the purpose of the RMA set out in section 5, various matters of national importance must be recognised and provided for. In relation to those matters:

- (a) The Project does not affect the coastal environment, any outstanding natural features or landscapes, any areas of significant indigenous vegetation or significant habitats of indigenous fauna and nor does it affect any public access to and along the coastal marine area, lakes, and rivers.
- (b) The Project has recognised and sought to provide for the relationship of Te Rūnanga o Ngāi Tūāhuriri and Te Taumutu Rūnanga and their culture and traditions with their ancestral lands, water, and other taonga.
- (c) The Project does not affect historic heritage or any protected customary rights and is not subject to any significant risks from natural hazards (and otherwise recognises and provides for natural hazard risks).

9.4 In regard to the matters set out in section 7 of the RMA:

- (a) HDL recognises Te Rūnanga o Ngāi Tūāhuriri and Te Taumutu Rūnanga as kaitiaki over the Site, but in its capacity as the landowner and authorised person, HDL has sought to apply an ethic of stewardship in its approach to managing natural and physical resources through the Project. That ethic has been implemented particularly in relation to the proposed enhancement of the Waterways, the use of native planting within proposed landscaping, and the various initiatives to retain existing vegetation, reintroduce native species and enhance the habitat for lizards and birds within the Site. It is also reflected in the various measures to be adopted by HDL to reduce or avoid adverse effects during construction, including the use of accidental discovery protocols and management plans.

- (b) The Project represents an efficient use and development of (finite) natural and physical resources and, in particular, land zoned for housing. As discussed further below, development of the Site in accordance with the LLR anticipated density represents an inefficient use of residentially zoned land particularly given the higher density anticipated for this Site by DEV-DA3 in future. By comparison, delivering that higher density now – in a considered manner that does not compromise the existing character of Darfield – will ensure that infrastructure can be funded and delivered efficiently to meet inevitable demand, and will avoid the requirement to retrofit infrastructure capacity to meet higher demand in future.
- (c) The Project will support the maintenance and enhancement of amenity values and the quality of the environment both within the Site and in the context of the surrounding environment, as described in the UDA and in paragraphs 18.5 – 18.9 below.
- (d) The Project has also been designed to minimise adverse effects on, and in some instances enhance, the intrinsic values of the ecosystems within the Site.

9.5 In these ways, the Project is consistent with, and will achieve the purpose of, the RMA.

10 Assessment of the Project against the relevant provisions of the applicable planning documents (clauses 5(1)(h), 5(2) and 5(3), Schedule 5)

- 10.1 The national planning documents listed in Schedule 5, clause 5(2) of the FTAA which apply to the Project are the National Policy Statement for Infrastructure 2025 (*NPS-I*), the NPS-FM, the National Policy Statement for Natural Hazards 2025 (*NPS-NH*), the National Policy Statement for Indigenous Biodiversity 2023 (*NPS-IB*), and the NES-CS.
- 10.2 The Site is zoned LLR and therefore does not meet the transitional definition of highly productive land under the National Policy Statement on Highly Productive Land (*NPS-HPL*). The provisions of the NPS-HPL therefore do not apply to the Site or the Project.
- 10.3 Darfield township (including the Site) does not meet the definition of “urban environment” in the NPS-UD. Consequently, the provisions of the NPS-UD do not apply to the Site or the Project. Nevertheless, as outlined in the UDA, those provisions have influenced the design and layout of the Project, which seeks to ensure that it contributes to Darfield meeting the criteria of a “well-functioning urban environment” set out in Policy 1 of the NPS-UD.⁴⁶
- 10.4 The district and regional planning documents listed in Schedule 5, clause 5(2) of the FTAA which apply to the Project are the CRPS, the LWRP, the Canterbury Air Regional Plan (*CARP*), the District Plan and the Mahaanui Iwi Management Plan 2013 (*IMP*). While not listed in Schedule 5, clause 5(2), Waikirikiri Ki Tua Future Selwyn (*Future Selwyn*) and the Malvern Area Plan 2031 (*Area Plan*) are both strategic documents which are relevant to the Site and the Project and which may be considered under Schedule 5, clause 17(1)(b) of the FTAA and section 104(1)(c) of the RMA.
- 10.5 The following section:
 - (a) summarises the relevant objectives and policies of the national, regional and district planning documents in relation to the topics engaged by the Project; and
 - (b) assesses the Project against those provisions.

⁴⁶ Attachment 3, UDA, page 39 - 40.

- 10.6 A full list of all the relevant objectives and policies of the RMA planning documents is included as **Attachment 18**, along with an assessment of the Project against those provisions.
- 10.7 A full compliance assessment of the Project against all the relevant rules (including applicable standards and assessment criteria) of the RMA planning documents is included as **Attachment 9**.

Urban growth, form and development

Canterbury Regional Policy Statement 2016

- 10.8 Chapter 5 of the CRPS includes objectives and policies relating to the location, design and function of urban development of the Canterbury region. It directs development towards achieving consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth.⁴⁷ Chapter 5 also provides that development should be designed to enable people and communities including future generations to provide for their wellbeing and to provide sufficient, diverse housing choice to meet the region's housing needs.⁴⁸

District Plan

- 10.9 The District Plan directions relating to urban form and development reflect these higher order objectives, directing urban growth to be located only within or adjoining existing townships and in alignment with the Township Network and in a manner that is well integrated with the efficient provision of infrastructure.⁴⁹ Darfield is identified in the District Plan as a "Service Township" within the Township Network of Selwyn, meaning it functions "based on providing a high amenity residential environment and primary services to Rural Townships and surrounding rural area" – it is also identified as a Key Activity Centre for the wider district.⁵⁰ Under the District Plan, new urban areas are to support the role and function of settlements within the Township Network.⁵¹
- 10.10 As described further below, Future Selwyn (being a strategic growth document released by SDC following notification of decisions on the District Plan) has since identified Darfield as a "Strategic Town".
- 10.11 The District Plan directs urban growth to, among other outcomes:
- (a) achieve high quality urban environments which integrate with existing residential neighbourhoods and ensure that townships maintain a consolidated and compact urban form;⁵²
 - (b) provide for urban intensification of existing land within urban zones, including through implementation of a development plan such as the Area Plan;⁵³
 - (c) coordinate with the provision of infrastructure;⁵⁴ and

⁴⁷ CRPS, objective 5.2.1(1), policy 5.3.1(1).

⁴⁸ CRPS, objective 5.2.1(2), policy 5.3.1(2); policy 5.3.3.

⁴⁹ District Plan, objectives SD-UFD-O2(1), SD-UFD-O4(1).

⁵⁰ Refer definitions of "Township Network" and "Activity Centre Network" in the District Plan.

⁵¹ District Plan, objective SD-DI-O5; policy UG-P7(2).

⁵² District Plan, objectives UG-O1(1), UG-O1(6), UG-O2, policy UG-P7.

⁵³ District Plan, policy UG-P17.

⁵⁴ District Plan, objective UG-O1(7); objective SUB-O2, policies SUB-P3(3) and TRAN-P2(1).

(d) protect the health and well-being of water bodies.⁵⁵

10.12 The District Plan direction to provide more intensive housing typologies and improved housing choice is also reflected in Future Selwyn, which identifies that higher density accommodation will be particularly appropriate for Strategic Towns, such as Darfield.⁵⁶

10.13 In terms of the Site's zoning, the District Plan directions for the LLR zone seek to provide for residential activity on a large site and require a "very low density and spacious residential character" through managing the density of development and managing the height, bulk and form of development.⁵⁷ For proposals involving subdivision, site sizes are directed to reflect those anticipated development outcomes.⁵⁸ For land that is subject to an ODP, the District Plan requires that subdivision is also managed to ensure that the outcomes intended by that Plan are met.⁵⁹

10.14 DEV-DA3 is an ODP which applies to the Site. DEV-DA3 is a legacy development plan, having been rolled over from the previous district plan in 2015. It comprises specific features, including an indicative road alignment and cycle/pedestrian route, setbacks and a noise control boundary adjoining the State Highways along West Coast Road / SH 73. It also includes specific directions in the accompanying ODP narrative. Those directions anticipate that the Site will provide for a "low density residential style" of development, with an overall average lot size of 1ha.⁶⁰ DEV-DA3 nevertheless recognises that the area may transition to higher density residential living over time and therefore directs that, at the time of subdivision, consideration is given to "future proofing infrastructure for higher densities".⁶¹

10.15 Of particular relevance to the Project, the Malvern Area Plan (adopted in 2016):⁶²

(a) Identifies that there is a significant oversupply of low-density land in Darfield (between 5,000m² – 2ha) and that oversupply:

- (i) does not support a compact, concentric urban form;
- (ii) underutilises greenfield land; and
- (iii) results in inefficiencies and inequitable costs in terms of infrastructure delivery.

(b) Identifies that there are opportunities to facilitate more intensive housing typologies within close proximity to the Darfield town centre to better meet the needs of the wider community.

10.16 Those directions have remained unchanged since DEV-DA3 was first included in the previous district plan in 2015; however, since that time, both the housing market in this part of the Canterbury region and the directions of the higher order documents relating to the provision of housing have changed significantly.

10.17 As set out in the Economic Impact Assessment, the Canterbury region – and the Selwyn district in particular – has experienced a rapid, consistent surge in housing prices over the last five years in the face of significant population growth in that area and a shortage of available

⁵⁵ District Plan, objective UG-O1(4).

⁵⁶ Future Selwyn, Urban Form Direction.

⁵⁷ District Plan, objective LLRZ-O1, policy LLRZ-P1.

⁵⁸ District Plan, objectives SUB-O1, SUB-O3.

⁵⁹ District Plan, policy SUB-P5.

⁶⁰ District Plan, DEV-DA3, Land Use.

⁶¹ District Plan, DEV-DA3, Land Use.

⁶² Area Plan, pages 24 – 25.

housing capacity.⁶³ In that context, both the CRPS and the District Plan include strong directions towards providing for higher density accommodation in appropriate locations to meet housing needs within the region.

Future Selwyn

10.18 Like the District Plan, Future Selwyn also directs growth in accordance with the township network.⁶⁴ It identifies Darfield as a “Strategic Town”, which is a commercial, economic, social and civic centre for its respective area.⁶⁵ Strategic Towns are located on strategic routes; are supported by enabling infrastructure; are projected to experience substantial growth; and are also identified as being able to support a broader range of services and activities into the future.⁶⁶

10.19 Future Selwyn notes that Selwyn has faced considerable urban growth and outward urban expansion, which has contributed to the progressive loss and fragmentation of land for primary production. Future Selwyn also identifies that:⁶⁷

- (a) over the next thirty years Selwyn will need an additional 33,000 homes in residential areas;
- (b) low-density, dispersed urban form and the current urban development model is a highly inefficient use of land; and
- (c) greater intensification within Selwyn is necessary and should occur around town centres and in new greenfield developments.

Assessment of the Project

10.20 For the following reasons, the Project is consistent with the CRPS and the majority of the relevant District Plan objectives and policies and is also consistent with, and will support, Darfield’s function as a Strategic Town in Future Selwyn:

- (a) The Site is located within the existing Darfield township, in close proximity to existing community facilities including McHugh’s Forest Park, the Darfield Reserve, Darfield High School, and the primary town centre.⁶⁸ As an existing urban zoned site, it is the appropriate location to enable the delivery of housing to support a consolidated urban form and to contribute to the supply of housing to meet demand in the Selwyn district.⁶⁹
- (b) The Project has been designed to integrate and connect with the existing township and surrounding land uses and will be supported by enabling infrastructure, including the recent wastewater upgrades which now connect Darfield to Selwyn Water’s existing network. The design and layout of the Site, including the boundary interfaces, public realm areas and the placement of density within the Site, have been guided by best-practice urban design principles, drawing on input from HDL’s ecology experts and landscape experts. As set out in the UDA, HDL’s urban design expert concludes that the Project will deliver a high-quality urban outcome that is sensitive to (and will

⁶³ Attachment 15, Economic Assessment Update, Appendix – Economic Impact Assessment, at page 50.

⁶⁴ Future Selwyn, LLCT-1.

⁶⁵ Future Selwyn, District Picture.

⁶⁶ Future Selwyn, District Picture.

⁶⁷ Future Selwyn, Natural Environment, Priority of Opportunities; Homes and Places, Intensification; and Urban Form Direction, Place; Future Selwyn Topic Paper, Urban Form Direction, Homes and Places, Housing Supply and Quality; Homes and Places | Waikirikiri Ki Tua Future Selwyn Current.

⁶⁸ Attachment 3, UDA, Figure 1.

⁶⁹ Attachment 3, UDA, page 66; District Plan, objective SD-UFD-O3.

enhance) the Site's natural features and the wider character of the surrounding environment.⁷⁰

- (c) The Project will also provide increased housing choice through a higher density offering, located in strategic areas of the Site. Positioning the significantly larger lots at the perimeter of the Site (to the north and west) will ensure that the more rural character of those areas is maintained and that a transition to the more suburban density (between 1,000m² – 6,000m²) located toward the centre of the Site is achieved.⁷¹
- (d) The Project will be integrated with the delivery of all infrastructure needed to service the development.
- (e) The Project design has incorporated Crime Prevention Through Environmental Design principles to promote the safety of residents and visitors as they move through the Site.⁷²

10.21 Notwithstanding that larger lots (1ha +) will be provided as part of the Project along the rural interfaces of the Site, the average lot size for the Project overall (1,344m²) is below the minimum average lot size for the LLR zone (5,000m²). The Project allotments are also generally below the anticipated site sizes for DEV-DA3, which ranges between 3,700m² – 2ha. Consequently, the Project is not consistent with the LLR zone direction to achieve a "very low density and spacious residential character".⁷³ Nor is it consistent with the site sizes anticipated for the Site by DEV-DA3.

10.22 At approximately 5.5hh/ha however, the overall density of the Project is half of the minimum density anticipated in suburban areas within Selwyn's largest townships and is therefore low in a relative sense (albeit not "very low" as anticipated in the LLR zone).⁷⁴ Further, the anticipated yield for the Project is not considered to be incompatible with the character of Darfield and the layout of the Project will internalise higher densities with the perimeter maintaining large lots consistent with the aim of LLRZ-O1 to retain a peri-urban character at the rural interface.

10.23 Inconsistency with the LLR zone directions is also considered acceptable given:

- (a) The Site has been anticipated for higher density residential development since 2015 and in the intervening time the Selwyn housing market (including the demand for housing) has grown significantly and there has been a policy shift toward delivering more housing in existing urban areas of New Zealand generally. That is reflected in the identification of Darfield as a Strategic Town in Future Selwyn and in the directions of the Area Plan and District Plan which seek to provide for urban intensification. Given that shift in direction since 2015, it is appropriate that the opportunity to deliver higher density for the Site is realised now, rather than relying on further subdivision of the Site in future which would deliver a less considered, more ad hoc urban outcome.
- (b) Developing the Site for the lower density outcomes anticipated by the LLR zone and DEV-DA3 in the first instance represents a wholly inefficient use of the Site. Delivering those lower density outcomes while preserving the opportunity through infrastructure capacity upgrades for higher density in the future is also not feasible or realistic as it would not deliver the initial yield required to service those upgrades.

⁷⁰ Attachment 3, UDA, pages 71-72 and 81. CRPS, policy 5.3.1(4).

⁷¹ Attachment 3, UDA, pages 48-49.

⁷² Attachment 3, UDA, pages 76-77.

⁷³ District Plan, objective LLRZ-O1, policy LLRZ-P1.

⁷⁴ Attachment 3, UDA, page 80.

- (c) While the LLR zone provisions use directive language as to the nature of development that should be provided for (i.e. “very low density”), the provisions do not expressly prohibit more intensive development.

10.24 In summary, while the Project cannot be said to be wholly consistent with the objective of the LLR zone (in terms of the anticipated density outcomes), it is otherwise consistent with the objectives and policies of the CRPS and the District Plan as they relate to urban growth and form, and the aspirations of Future Selwyn and the Area Plan for Darfield.⁷⁵ It also delivers the higher density outcomes that have been anticipated for the Site since 2015 (representing an efficient use of the Site and infrastructure), while also preserving a spacious residential character (particularly around the perimeter of the Site) to facilitate the transition between the more suburban parts of Darfield and its surrounding rural environment.⁷⁶

Infrastructure

National Policy Statement for Infrastructure 2025

10.25 The NPS-I seeks that the benefits of infrastructure are provided for, including in support of social, economic and cultural wellbeing of the people and communities served by the infrastructure. The NPS-I also seeks to enable infrastructure to support the development and change of urban and rural environments to meet diverse and changing needs. Under the NPS-I infrastructure is to be well-functioning, resilient and compatible with other activities as far as practicable.⁷⁷

10.26 Key policy direction of relevance to the Project includes:

- (a) recognition of the beneficial linkage between infrastructure and the creation, support and enhancement of well-functioning urban and rural environments;⁷⁸
- (b) the need to recognise significant risks to, and impacts on, public safety and wellbeing that may occur when infrastructure services are compromised;⁷⁹
- (c) recognition that noise, vibration and other effects are typical of infrastructure which can be managed where practicable, but not always completely avoided;⁸⁰ and
- (d) applying the general principle that the primary responsibility for managing adverse effects is on the new activity (in this case, the Project) while allowing flexibility for site- and project-specific circumstances.⁸¹

Canterbury Regional Policy Statement 2016 and the District Plan

10.27 The key themes from the relevant local and regional planning documents relating to infrastructure include:

- (a) integrating development with the safe, efficient and effective provision of infrastructure and transport networks, connections and modes to provide for sustainable and efficient movement;⁸²

⁷⁵ Attachment 3, UDA, pages 65-66 and 69-70

⁷⁶ Attachment 3, UDA, pages 69 and 72-73.

⁷⁷ NPS-I, objective (1), (a)-(d)

⁷⁸ NPS-I, policy 1(2)(b)

⁷⁹ NPS-I, policy 1(3)(a)

⁸⁰ NPS-I, policy 11(1)(a)

⁸¹ NPS-I, policy 11(1)(c)

⁸² CPRS, policies 5.3.2(3) and 5.3.7(1); District Plan, objectives TRAN-O1, UG-O2(3), policy UG-P12.

- (b) ensuring that development is appropriately and efficiently served by waters infrastructure and that development which constrains the development and use of existing water infrastructure is avoided;⁸³
- (c) requiring stormwater run-off volumes and peak flows to be managed so they do not exacerbate the risk of inundation, erosion or damage to property or infrastructure or risks to human safety;⁸⁴ and
- (d) promoting transport choice through enabling safe, multi-modal connections and access to public transport.⁸⁵

10.28 The District Plan also includes specific directions relating to transport matters and infrastructure in DEV-DA3.⁸⁶

Assessment of the Project

10.29 The transport and infrastructure servicing features of the Project are addressed in the ITA prepared by Novo Group (Attachment 13) and the Infrastructure Assessment prepared by DLS (Attachment 4).

10.30 In relation to transport, careful consideration has been given to the access arrangements to the Site to ensure the ongoing safe operation of the adjoining State Highway network and the efficient movement of future residents within and from the Site.⁸⁷ In accordance with the DEV-DA3 directions, no vehicle access is provided to West Coast Road / SH 73. Two vehicle accesses to the Site are proposed from Bangor Road, with the primary access leading into the main north-south boulevard running through the middle of the Site. The balance of the roading layout will comprise a central collector road and a network of local roads which will frame the blocks.

10.31 As outlined in paragraph 3.14, the Project will also deliver key upgrades to the wider transport network to support the safe and efficient integration of the Project with the transport network.

10.32 The ITA confirms that the transport-related non-compliances with the District Plan largely arise from the Project's design approach, which seeks to deliver a more suburban density contemplated by the LLR.⁸⁸ In this respect, the proposed transport network has been designed to support the scale, density and urban form anticipated by the Project, rather than the lower-density development outcomes contemplated by the existing LLR framework.

10.33 The ITA concludes however that the proposed internal road network is suitable for the anticipated residential traffic volumes and provides appropriate facilities for vehicles, pedestrians, servicing and emergency access.⁸⁹ The ITA also confirms that the proposed road upgrades, together with appropriate staging and detailed design processes, will enable the Project to be safely and efficiently integrated with Bangor Road and the wider transport network, consistent with the objectives and policies of the CRPS and the District Plan.⁹⁰

⁸³ CRPS, 5.3.6; LWRP, policy 4.15; District Plan, objectives UG-O1(7), UG-O2(3). See also Future Selwyn at QI-1 – QI-7. District Plan, SUB-MAT5 – SUB-MAT7.

⁸⁴ LWRP, policy 4.17; CRPS policies 5.3.5 and 5.3.6.

⁸⁵ District Plan, objective TRAN-O1, policies TRAN-P6 TRAN-P2(2) and TRAN-P5; CRPS, policy 5.3.8(1). See also Future Selwyn at SAT-1 – SAT-5.

⁸⁶ See for example District Plan, DEV-DA3, Access and Transport.

⁸⁷ District Plan, policy SUB-P2.

⁸⁸ Attachment 13, Integrated Transport Assessment, page 22-24.

⁸⁹ District Plan, policy TRAN-P11; SUB-MAT9(1)(b)(c)(d) and (f); TRAN-MAT1 and TRAN-MAT2.

⁹⁰ CRPS, objective 5.2.3; and policy 5.3.8; District Plan, policy TRAN-P7.

10.34 A shared path network for pedestrians and cyclists will be established within the Site which will promote transport choice and will ensure safe and efficient multi-modal options for moving around the Site.⁹¹ Within the wider environment, HDL has committed to upgrading the existing pathway on the southern side of Bangor Road to enable safe connection between the Site and the existing township for future residents.

10.35 The transport design also includes measures that avoid or minimise reverse sensitivity effects on the State Highway network. In particular, no individual lots will have direct access to West Coast Road / SH 73 or Bangor Road / SH 77, with all traffic directed through the internal road network and the two controlled access points to Bangor Road. In conjunction with the proposed frontage upgrades, intersection improvements and staged network upgrades, this approach will assist in maintaining the safe and efficient operation of the State Highway network over the long term.⁹² For completeness, the Project does not give rise to any adverse effects on the adjacent rail network.⁹³

10.36 In relation to waters infrastructure, appropriate and efficient servicing of the Project will occur through:

- (a) The connection of the Site to Selwyn Water's reticulated wastewater network which has recently been extended to Darfield and has sufficient capacity to accommodate flow volumes from the Project provided a low pressure sewer system is adopted. The connection will be facilitated through the construction of a low pressure sewer system comprising individual pumping units within each lot and a network of pressure laterals, and 1800m rising main (to be constructed as part of the Project) which will enable the passage of wastewater through to the Selwyn Water connection point.
- (b) The connection of the Site to Selwyn Water's water supply network, which also has sufficient capacity to service the Project as set out in the Infrastructure Assessment. HDL intends to fund and provide a new pipe connection to the existing Selwyn Water water supply facility on the northern boundary of the Site which will have more flow capacity than required simply to service the Project. This will provide a greater level of service for all existing residential areas to the south of SH 73 and SH 77.

10.37 Through these initiatives the Project will be consistent with the NPS-I, CRPS, LWRP and District Plan directions relating to waters infrastructure. Namely, these initiatives ensure that the Project will be efficiently serviced by waters infrastructure while also avoiding any constraints on the servicing of existing development. The Project waters servicing will also comply with the directives in the Ngāi Tahu Subdivision Guidelines (which form part of the IMP) that express a strong preference for waters infrastructure to be delivered through Selwyn Water's networks that have sufficient capacity to accommodate demand.⁹⁴

10.38 In regard to stormwater:

- (a) The proposed discharge of stormwater to ground (which is appropriate given the conditions of the Site) will utilise the natural ability of the earth to filter and cleanse stormwater, consistent with the Ngāi Tahu Subdivision and Development Guidelines.⁹⁵
- (b) The primary network (comprising kerb and channel and swales as conveyance methods and soakpits as discharge points) will be designed to avoid effects on safety and

⁹¹ District Plan, SUB-MAT9(3).

⁹² Attachment 13, Integrated Transport Assessment, page 22-24.

⁹³ District Plan, policy TRAN-P8.

⁹⁴ IMP, P4.3.

⁹⁵ IMP, P4.3 - Ngāi Tahu Subdivision and Development Guidelines, at 2.1.

property or infrastructure within the Site and the surrounding environment up to and including a 2% AEP rainfall event. The secondary network (comprising swales for additional storage and the conveyance of stormwater flows along roads) will direct the stormwater exceeding 2% AEP rainfall events away from the Waterways and along the flow paths, discharging at the pre-development locations at no greater flow rate than what currently occurs.

- (c) In accordance with the requirements of the LWRP, the operation of the stormwater network will be managed in accordance with a Stormwater Management Plan (*SMP*), required as a condition of the Proposed ECan Conditions.⁹⁶

10.39 Through these measures, the effects of stormwater on the Project will be avoided and the Project will not result in any exacerbated effects on properties resulting from the displacement of floodwaters or changes in the flow rates or volume of stormwater.

Noise

10.40 The District Plan imposes Noise Control Overlays relating to both State Highways adjoining the Site and the Midland Rail Line which adjoins West Coast Road / SH 73 near the Site. Each of those Overlays extend part way into the Site.

National Policy Statement for Infrastructure 2025, Canterbury Regional Policy Statement 2016 and the District Plan

10.41 The provisions of the NPS-I, CRPS and the District Plan collectively:⁹⁷

- (a) acknowledge that infrastructure may typically comprise noise, vibration and other effects;
- (b) seek to protect the health and wellbeing of communities from adverse noise effects; and
- (c) seek to ensure the State Highway and designated rail network is protected from reverse sensitivity effects by either avoiding noise sensitive activities near that infrastructure or ensuring that noise mitigation for those activities is provided.

Assessment of the Project

10.42 As outlined in the Sound Level Assessment prepared by Marshall Day Acoustics (**Attachment 20**), specific measures have been proposed as part of the Project to address reverse sensitivity effects on the adjoining State Highway and rail corridor and to assist in protecting future residents from adverse noise effects.⁹⁸ Those measures are:

- (a) A 3m high bund extending along the Site's eastern boundary adjoining the rail corridor and West Coast Road / SH 73, and the provision of 1.8m timber close boarded fencing between lots adjoining the SH 73 boundary.
- (b) A 3m high acoustic fence extending along the Site's southern boundary adjoining Bangor Road / SH 77, along with strategically placed 3m-high bunding at the entries to the Site.

⁹⁶ Attachment 7, Proposed ECan Conditions (Operational Phase Stormwater), conditions 15 and 16. District Plan, policy SUB-P3(5).

⁹⁷ NPS-I, policy 11(1)(a); CRPS, 5.2.1(2)(f) and 5.2.1(2)(g), 5.3.2(2)(b); District Plan, objective NOISE-O1, NOISE-O2, policy NOISE-P2.

⁹⁸ CRPS, objective 5.2.2, policy 5.3.9(1); and District Plan, objectives UG-O1(9), EI-O3 and TRAN-O2, policies SUB-P11 and TRAN-P8(1).

Fencing will also be placed between lots adjoining the Bangor Road / SH 77 boundary. The existing shelter belt along that boundary will also remain in place and will provide some additional attenuation.

10.43 Through these measures, the Project will ensure that, for all but four lots within the State Highway Noise Control Overlay, compliance can be achieved with the permitted *outdoor* noise standards in the District Plan for noise-sensitive activities (NOISE R3.1). For the remaining four lots, compliance with the permitted *outdoor* noise standards will depend on the location of the future dwellings within the Site. Where compliance cannot be achieved, Marshall Day concludes that the effects of outdoor noise from the State Highway on the residential amenity of those lots will be acceptable because there are sufficient areas within each of those lots to create outdoor living environments that can achieve compliance with the permitted *outdoor* noise standards, including through the use of screening or other mitigations.⁹⁹ The nature of those mitigations can be tested and secured through a future consenting process for the establishment of dwellings on those lots.

10.44 Compliance with the permitted *indoor* noise standards (NOISE R3.2) will be achieved whether either the dwellings are sufficiently set back from the boundary of the State Highways or they are designed and constructed with sufficient noise attenuation within the dwellings to comply with the indoor noise level requirements in the District Plan.

10.45 In summary, through the noise mitigation measures proposed, the Project will enable compliance for the vast majority of lots with the permitted indoor and outdoor noise standards in the District Plan which apply to residential activities in the Noise Control Overlays. Where compliance cannot be achieved with the permitted standards, there is a consenting pathway in the District Plan which will enable the noise and potential reverse sensitivity effects of the dwelling to be considered by SDC.

10.46 Marshall Day therefore concludes that the Project will ensure any adverse noise effects from the State Highway and Railway Line on future residents of those lots are avoided and that potential reverse sensitivity effects on the operation of that important infrastructure are also avoided. Based on that conclusion, the Project is considered to be consistent with the relevant provisions of the NPS-I, CRPS and District Plan address noise and reverse sensitivity effects on important infrastructure.

10.47 Construction noise and vibration will comply with the permitted standards in the District Plan (NOISE R2.1, NOISE-REQ2).

Aquatic ecology and groundwater

National Policy Statement for Freshwater Management 2020

10.48 The provisions of the NPS-FM apply to the Project as a result of the Waterways that traverse the Site which contain freshwater, and the proposed discharge of stormwater to ground (with groundwater being between 50 - 100m below ground level).

10.49 The NPS-FM provides national direction on the management of freshwater. The policies of the NPS-FM require the implementation of Te Mana o te Wai, being a concept that recognises the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment. Te Mana o te Wai protects the mauri of the wai and is also about restoring and preserving the balance between the water, the wider environment, and the community. The policies of the NPS-FM also require the active

⁹⁹ Attachment 20, Sound Level Assessment, page 16.

involvement of tangata whenua in the management of freshwater¹⁰⁰ and require freshwater to be managed and monitored in order to improve the health and wellbeing of degraded waterbodies and freshwater ecosystems and the protection of indigenous freshwater species habitats.¹⁰¹

Canterbury Regional Policy Statement 2016

10.50 The CRPS objectives seek to maintain or improve the quality of freshwater in Canterbury and safeguard the life supporting capacity, ecosystem processes and indigenous species and their associated freshwater ecosystems.¹⁰² The direction for managing freshwater is through an integrated approach, recognising the interconnectivity between freshwater bodies and other natural and physical resources and communities (*ki uta ki tai* – from the mountains to the sea).¹⁰³

Canterbury Land and Water Regional Plan

10.51 The relevant provisions of the LWRP similarly recognise the relationship and connectivity between surface water and groundwater and seek to ensure that land and water are managed as integrated resources. The provisions also acknowledge the water is essential to all life and is respected for its intrinsic values, and that the quality and quantity of water in freshwater bodies and their catchments is managed to safeguard the life-supporting capacity of ecosystems and ecosystem processes.¹⁰⁴

10.52 Adverse effects on water quality, aquatic ecosystems, existing uses and values of water and public health from the cumulative effects of water discharges are to be avoided through (among other outcomes) the discharge of sewage to a reticulated system, the discharge of stormwater to ground or to a reticulated system.¹⁰⁵ The LWRP provisions also require stormwater run-off volumes and peak flows to be managed so that they do not cause or exacerbate the risk of inundation, erosion or damage to property or infrastructure downstream or risks to human safety.¹⁰⁶

10.53 Provisions relating to groundwater require that groundwater resources remain a sustainable source of high-quality water and that any discharge of contaminant into land where it may enter groundwater will not exceed the natural capacity of the soil to treat or remove the contaminant and will not exceed available water storage capacity of the soil.¹⁰⁷

Mahaanui Iwi Management Plan

10.54 The IMP provides for the interconnectedness of aquatic ecology with the cultural identity of mana whenua, mahinga kai, and the overall mauri of freshwater. It emphasises a *ki uta ki tai* approach, recognising the relationships and interconnectedness of land, water, and biodiversity and that degradation in one part of the system affects the whole catchment.¹⁰⁸

10.55 Key themes include protecting and restoring water quality and quantity, safeguarding indigenous biodiversity and fish passage, restoring wetlands and riparian margins, eliminating direct contaminant discharges to water, and ensuring waterways are healthy enough to

¹⁰⁰ NPS-FM, policies 1 and 2.

¹⁰¹ NPS-FM, policies 3, 5 9, and 13.

¹⁰² CRPS, objective 7.2.3.

¹⁰³ CRPS, objective 7.2.4

¹⁰⁴ LWRP, objective 3.2, 3.6 and 3.8.

¹⁰⁵ LWRP, policy 4.15.

¹⁰⁶ LWRP, policy 4.17.

¹⁰⁷ LWRP, objective 3.13, policy 4.14.

¹⁰⁸ IMP, 5.3(3); 5.313.

sustain customary use and mahinga kai for future generations.¹⁰⁹ The IMP also directs that aquatic ecosystems should be managed according to kaitiakitanga principles, with tangata whenua actively involved in decision-making and monitoring cultural and ecological health indicators.¹¹⁰

Assessment of the Project

10.56 As outlined at paragraph 4.11 above, ecological surveys undertaken by HDL's aquatic ecologists have confirmed that the ecological health of the Waterways on the Site is low and that the only identified fish species in the water races was the upland bully.

10.57 Drawing on the advice of HDL's ecologists, the Project includes a number of initiatives which recognise the intrinsic values of the Waterways and their interconnectedness with the health and functioning of the wider environment and which are intended to improve the health of the Waterways and the fish and macroinvertebrate habitats that those Waterways support. These initiatives include:

- (a) The realignment of Waterway 1 to avoid the drip line of the existing mature *Eucalyptus* trees which will be retained as part of the Project. This will reduce the amount of *Eucalyptus* detritus leachate that currently falls into Waterway 1 and adversely effects its ecological values.
- (b) The extensive riparian planting that is proposed along the extent of the Waterways with low-growing overhanging species such as *Carex* sp. at the waterway margins and larger tree and shrub species such as harakeke/NZ flax (*Phormium tenax*) or cabbage tree (*Cordyline australis*) further up the bank, to provide waterway shade and bank stability through deeper roots.
- (c) The installation of new culverts embedded with substrate gravels to improve fish passage. Where fish salvage and translocation are required to enable the construction of these culverts, those activities will be managed in accordance with a Fish Management Plan.
- (d) The ongoing monitoring and maintenance of the Waterways.
- (e) The implementation of an ESCP and SMP to prevent construction stormwater from entering the Waterways and the contouring of the Site to ensure that operational stormwater is directed away from the Waterways.

10.58 Through the implementation of these initiatives (required as conditions of the Draft SDC Consent), AEL concludes that the Project will have a net beneficial effect on the ecological values of the Waterways, improving the overall health of the Waterways and the habitats they support.¹¹¹

10.59 The proposed discharge of stormwater to ground will not result in any adverse effects on groundwater given the significant separation between the point of discharge and the point where groundwater is encountered, and the water storage capacity of underlying soil.

10.60 In summary, as a result of the ground conditions and through various protection and enhancement initiatives for the Waterways, the Project is consistent with the relevant policies

¹⁰⁹ IMP, WM6.3, WM6.5, WM8.2, WM13.2, WM6.2(d), WM12.2 WM12.4, WM12.6, WM13.1, WM5.3(8).

¹¹⁰ IMP, WM4.1.

¹¹¹ Attachment 11, Aquatic Ecology Assessment, pages 11, 12.

of the NPS-FM, the CRPS, the LWRP and the IMP which recognise and seek to safeguard the health of freshwater.

- 10.61 The Project is also consistent with the directions in those documents and the IMP which specifically recognise the importance of mana whenua's involvement in freshwater management.¹¹² HDL understands that the proposed enhancement of the Waterways as part of the Project is a key matter of interest to the Rūnanga Representatives. To that end, the recommendations and comments provided by MKT and Whitiara as part of the referral application have directly informed the design and approach to the enhancement of the Waterways, as explained in Attachment 17.

Terrestrial ecology

National Policy Statement for Indigenous Biodiversity

- 10.62 The NPS-IB provides national direction on the management and protection of indigenous biodiversity and applies to the Project as a result of the indigenous wildlife and vegetation that exists on the Site.

- 10.63 The NPS-IB seeks to ensure that indigenous biodiversity is maintained so that there is at least no overall loss in indigenous biodiversity across Aotearoa.¹¹³ In particular, its policies promote the protection and restoration of indigenous biodiversity and increasing indigenous vegetation cover and ecological resilience;¹¹⁴ and recognise the exercise of kaitiakitanga by tangata whenua in the management of indigenous biodiversity.¹¹⁵ The NPS-IB directs that a precautionary approach be taken towards the consideration of adverse effects on indigenous biodiversity.¹¹⁶

Canterbury Regional Policy Statement 2016

- 10.64 The CRPS seeks to halt the decline in the quality and quantity of Canterbury's ecosystems and indigenous biodiversity, safeguarding their life-supporting capacity and mauri.¹¹⁷ Of relevance to the Project, particular emphasis is placed on the protection of habitats of Threatened and At-Risk species.¹¹⁸ The CRPS provisions also promote restoration and enhancement of ecosystems where appropriate, particularly where this supports Canterbury's natural character and the wellbeing of communities.¹¹⁹

Canterbury Land and Water Regional Plan

- 10.65 The terrestrial ecology provisions in the LWRP focus on controlling land-use effects on indigenous biodiversity, particularly where land activities intersect with freshwater, wetland and riparian environments. They direct that adverse effects from activities such as earthworks, vegetation clearance and land development are to be avoided, remedied or mitigated, with stricter management where indigenous biodiversity values are higher or more vulnerable.¹²⁰ The LWRP promotes maintaining indigenous species and their habitats and ensuring that land use does not degrade habitat quality or ecological function.¹²¹

¹¹² District Plan, objective NATC-O2.

¹¹³ NPS-IB, objective 1, policy 8.

¹¹⁴ NPS-IB, policy 13, 14 and 1.7(1)(iv); clause 1.7(1)(iv).

¹¹⁵ NPS-IB, policy 2.

¹¹⁶ NPS-IB, policy 3.

¹¹⁷ CRPS, objective 9.2.1, policy 9.3.3.

¹¹⁸ CRPS, policy 9.3.2.

¹¹⁹ CRPS, objective 9.2.2, policy 9.3.4.

¹²⁰ LWRP, policies 4.18, 4.20 and 4.22.

¹²¹ LWRP, objectives 3.8, 3.24.

10.66 Similarly with aquatic ecology, the IMP applies a *ki uta ki tai* approach to the management of indigenous biodiversity, which seeks to restore and enhance indigenous biodiversity in the Canterbury and protect existing areas of indigenous vegetation. The IMP also directs that the relationship of Ngāi Tahu with indigenous biodiversity and ecosystems is recognised and provided for.¹²²

Assessment of the Project

10.67 As outlined in paragraphs 4.12 – 4.13 above, the ecological values of the Site relate to:

- (a) The confirmed presence of at least one 'At Risk – Declining' skink (being the Canterbury grass skink) and the 'Possible' presence of the 'At Risk – Declining' southern grass skink, and the habitat supporting those skinks.
- (b) The potential use of the Site for foraging and/or nesting by one 'Threatened' and four 'At Risk – Declining' bird species.
- (c) The existing exotic grassland on the Site which may provide habitat for 'At Risk – Declining' bird and skinks.

10.68 While the provision of habitat for 'At Risk' species technically meets one of the CRPS criteria for "significant habitat of indigenous biodiversity", EME's opinion is that the exotic grassland on the Site is impacted by farming activities to such a degree that that classification is not warranted for the Site.¹²³

10.69 For the other Threatened or At Risk species, specific measures are proposed as part of the Project to safeguard these species as far as possible and to restore and enhance habitat quality and quantity on Site, particularly for lizards. These measures include:

- (a) Implementing a bird management plan (Proposed SDC Conditions, condition 39) to ensure effects on birds (including any active nests) are avoided during construction of the Project and to guide the implementation of measures in the reserves to improve nesting and foraging opportunities for birds once the Project is constructed.
- (b) Implementing a lizard management plan (**Attachment 21** and Proposed Wildlife Approval conditions, condition 1 (**Attachment 22**)) to avoid or minimise disturbance and incidental killing of lizards during construction.
- (c) Establishing the new dryland ecosystem within main central Reserve Area as part of the first stage of works on the Site to operate as the priority location for lizard release.
- (d) Establishing other areas of the Site to support lizard habitat and nesting and foraging opportunities for birds.

10.70 In addition, extensive new planting is proposed throughout the Site including within recreational reserves, along road reserves and in the riparian margins of the Waterways.

10.71 Through these measures, EME concludes that the Project will have very low effects on the terrestrial ecology values of the Site and will generate net gain outcomes for lizard and

¹²² IMP, 5.5(3), 5.5(7), and TM2.1; TM5.5(3) and 5.5(7), TM2.1.

¹²³ Attachment 12, Terrestrial Ecology Impact Assessment, at [4.1.2.3].

common native bird habitat and for indigenous vegetation.¹²⁴ The Project is therefore considered to be consistent with the directions in the NPS-IB, the CRPS, the LWRP and the IMP which relate to terrestrial ecology. In particular:

- (a) For indigenous biodiversity values of the Site with higher significance or greater vulnerability, dedicated measures are put in place to avoid effects on those values as far as possible and to promote enhancement of those values particularly through the establishment of new habitat areas.
- (b) Indigenous vegetation cover across the Site will be increased as a result of the Project which will support increased opportunities for fauna to nest and forage and will increase connectivity and corridors for fauna moving through the area. The significant riparian planting proposed along the Waterways also promotes an interconnected approach to the enhancement of both the terrestrial and aquatic ecology of the Site. In those respects, the Project will support the wider ecological function of the surrounding area.

Natural hazards

National Policy Statement for Natural Hazards 2025

10.72 The NPS-NH seeks to manage the risks of natural hazards to people and property by taking a risk-based proportionate approach.¹²⁵ That approach is framed by the level of risk to be assessed in accordance with the risk matrix in Appendix 1 of the NPS-NH (which requires consideration of both the likelihood and consequences of hazard events), while accounting for existing and proposed mitigation measures to address any identified risk.¹²⁶

10.73 Overall, the NPS-NH seeks to ensure that mitigation measures are applied to subdivision, use and development to ensure that very high natural hazard risks are avoided and that high – medium natural hazard risks are avoided or mitigated proportionate to the assessed level of risk.¹²⁷

Canterbury Regional Policy Statement 2016

10.74 The relevant CRPS objectives and policies seek to avoid development of land in high hazard areas where it increases natural hazard risks to people, property and infrastructure.¹²⁸ Where avoidance of such risk is not possible, mitigation measures are required to minimise such risks. The CRPS defines high hazard areas as “flood hazard areas subject to inundation events where in a 0.2% AEP event:

- (a) the water depth (metres) x velocity (metres per second) is greater than or equal to 1 (*hazard rating*); or
- (b) where depths are greater than 1 metre in a 0.2% AEP flood event.”

10.75 For areas which are not high hazard areas but are subject to a 0.5% AEP flood event, new subdivision, use and development is to be avoided unless there is no increased risk to life and new buildings have an appropriate floor level above the 0.5% AEP design flood level.¹²⁹

¹²⁴ Attachment 12, Terrestrial Ecology Impact Assessment, at [5].

¹²⁵ NPS-NH, objective 1.

¹²⁶ NPS-NH, policy 1.

¹²⁷ NPS-NH, policies 2 - 4.

¹²⁸ CRPS, objective 11.2.1, policy 11.3.1.

¹²⁹ CRPS, policy 11.3.2.

District Plan

10.76 Under the District Plan, development is to be avoided in areas where the risks from natural hazards are assessed as being unacceptable and in all other areas development is to be undertaken in a manner that ensures the risks of natural hazards to people, property and infrastructure are appropriately mitigated.¹³⁰

Assessment of the Project

10.77 In accordance with the requirements of the NPS-NH, the susceptibility of the Site and the Project to risks from natural hazards has been assessed by ENGEO (Attachment 10) and DLS (Attachment 4).¹³¹

10.78 ENGEO has confirmed that the Site is not subject to any risks associated with erosion, land instability or liquefaction.¹³² DLS confirms that the Site may experience potential effects from flooding in the 1 in 200-year (0.5% AEP) event and a 1 in 500-year (0.2% AEP) event.¹³³

10.79 Overall, ENGEO considers the flood risk to the Site to be low in accordance with the NPS-NH framework.¹³⁴ Based on the flood mitigation measures proposed for the Project, ENGEO concludes that only minor damage would occur during a 1 in 200-year (0.5% AEP) flood event, which would predominantly affect non-structural elements, and considers that repairs could be completed without any loss of use.¹³⁵

10.80 The Infrastructure Assessment confirms that the hazard rating for the Site is less than 1 and that the water depths in a 0.2% AEP event are less than 1m. Consequently, the Site is not a high hazard area as defined under the CRPS. Nevertheless:

- (a) consistent with the SDC Engineering Code of Practice, the stormwater network will be designed to ensure hydraulic neutrality for all events up to the 1% AEP event;
- (b) earthworks will ensure that lots are elevated above the road networks which will provide secondary conveyance for stormwater and overland flow; and
- (c) finished floor levels for future dwellings will be required to achieve at least a 300mm clearance above the 0.5% AEP design level.¹³⁶

10.81 With these measures in place, the Project will avoid adverse effects on people, property, infrastructure and the environment and will be consistent with the relevant directions in the NPS-NH, CRPS and District Plan regarding natural hazards.¹³⁷

¹³⁰ District Plan, objective NH-O1.

¹³¹ NPS-NH, policy 5.

¹³² Attachment 10, Geotechnical and Natural Hazard Assessment, section 4.

¹³³ Attachment 4, Infrastructure Assessment, section 4.2.

¹³⁴ Attachment 10, Geotechnical and Natural Hazard Assessment, Table 3.

¹³⁵ Attachment 10, Geotechnical and Natural Hazard Assessment, section 7.1.

¹³⁶ District Plan, objectives SD-IR-O3 and NH-O4, policies NH-P5, NH-P10; CRPS, objective 11.2.3; policies 5.3.2(2)(a), 11.3.8. NPS-NH, policy 6.

¹³⁷ CRPS, objective 11.2.2; District Plan, policy NH-P3.

Earthworks and dust

Canterbury Air Regional Plan

10.82 The provisions of the CARP seek to ensure that the air quality protects the mauri and life supporting capacity of the environment, provides for the health and wellbeing of people and that the amenity values of the receiving environment are maintained.¹³⁸

District Plan

10.83 The District Plan directs that earthworks are to be undertaken in a manner that limits adverse effects on the surrounding environment.¹³⁹ In achieving that objective, earthworks are to be managed to limit erosion, inundation and siltation so that they do not impede the functioning of natural biological and physical processes and so that temporary adverse visual amenity and nuisance effects are managed during construction.¹⁴⁰

Assessment of the Project

10.84 The discharge of dust to air as a result of construction activities will be mitigated as far as practicable through the implementation of the DMP and onsite management during construction. The use of water carts and stabilisation of disturbed land will be required during construction to ensure the dust does not project beyond the Site boundary. Through these measures, the permitted standards in Rule 7.32 of the CARP will be complied with and no resource consent in relation to the discharge of dust will be required.

10.85 The overall earthworks volume for the Project is 730,000m³ comprising:

- (a) 300,000m³ of topsoil strip.
- (b) 190,000m³ of cut to fill.
- (c) 240,000m³ of topsoil respread.

10.86 The earthworks undertaken as part of the Project is primarily required to form and shape the residential allotments, the formation of roads and the installation of necessary servicing.

10.87 In accordance with the District Plan directions, earthworks will be managed through a detailed ESCP and DMP which will be provided to SDC and ECan for certification prior to the commencement of any earthworks (Proposed SDC Conditions, condition 32; Proposed ECan Conditions (Construction Phase Stormwater), condition 12). A draft ESCP which includes a draft DMP is included as Attachment 8. The objective of these plans will be to ensure that earthworks are undertaken to avoid or minimise effects from earthworks (including dust) on the surrounding environment, including on the Waterways. Measures for ensuring that outcome will include:

- (a) Limiting the areas of bare earth to no more than five ha at any given time.
- (b) Stabilising areas that have been cut, filled and shaped as soon as practicable.
- (c) Minimising cut and fill depths to reduce the volume of material to be stockpiled on site.

¹³⁸ CARP, objectives 5.1, 5.2, 5.5 and 5.6 and policies 6.1, 6.3, 6.9, 6.10 and 6.13.

¹³⁹ District Plan, objective EW-O1.

¹⁴⁰ District Plan, objective EW-O1, policies EW-P3, EW-P5. See also IMP at P9.3, P9.4 and P11.1.

- (d) Implementing temporary soakpits and measures to direct stormwater to the soak pits and away from Waterways in particular.
- (e) Undertaking daily monitoring of sediment control measures.

10.88 Through these measures, the Project will ensure that erosion, inundation and siltation is either avoided or minimised to protect the ongoing functioning of natural biological and physical processes. The Project will also comply with the permitted standards for stockpiling of earthworks and will therefore ensure that any adverse visual amenity effects relating to stockpiles are avoided. The Project will therefore be consistent with the objectives and policies of the CARP and District Plan relating to earthworks.

Contamination

National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011

10.89 The NES-CS imposes controls on land that may be potentially contaminated to ensure that soils are appropriately assessed and, where contamination is identified, it is managed to protect human health.

10.90 Resource consent is sought under Regulation 10 of the NES-CS to authorise the change of land use and to disturb and remediate or remove contaminated material from the Site. The relevant matters of discretion under Regulation 10 primarily relate to the adequacy of the detailed site investigation, the suitability of the land for the proposed activity in light of the soil contamination, the appropriateness of any remediation measures, the adequacy of the site validation report, and the transport and disposal of soils.¹⁴¹

Canterbury Regional Policy Statement 2016, Canterbury Land and Water Regional Plan, Mahaanui Iwi Management Plan, District Plan

10.91 Where development may occur on land which is potentially contaminated, the relevant local and regional planning documents direct that site investigations are undertaken to ascertain the nature and extent of any contamination and the actual and potential effects of that contamination (where it is discovered) must be avoided, remedied or mitigated to avoid further significant adverse effects.¹⁴²

10.92 The District Plan requires that a best practice approach is adopted to investigate the risks of contamination and, if contamination is identified, to either remediate the contamination or manage activities on contaminated land to protect people and the environment.¹⁴³

Assessment of the Project

10.93 A combined preliminary and detailed investigation of the Site has been undertaken by ENGEO Limited (**Attachment 23**) (*Detailed Site Investigation*). That investigation identifies the existence of heavy metal concentrations in three specific parts of the Site which exceed the guideline values in the NES-CS.¹⁴⁴ These hotspots are generally located in near-surface soils,

¹⁴¹ Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011, regulation 10(3).

¹⁴² CRPS, policy 17.3.2; LWRP, objective 3.23. See also IMP at P10.1.

¹⁴³ District Plan, objective CL-O1, policies CL-P1, CL-P2.

¹⁴⁴ Attachment 23, Detailed Site Investigation, section 9.1.

associated with former dwelling areas and historical burn sites, which are located within areas proposed for reserve or recreational use as part of the Project.¹⁴⁵

10.94 In accordance ENGEO's recommendations:

- (a) Additional investigations will be completed prior to bulk earthworks to test uncharacterised areas of the Site and surveys for asbestos will also be completed (Proposed SDC Conditions, condition 50(a)).
- (b) Targeted remediation within the identified hotspot areas will be carried out prior to the commencement of bulk topsoil and fill stripping and in accordance with a Remediation Action Plan that must be submitted to SDC for certification in accordance with condition 50(b) of the Proposed SDC Conditions.
- (c) Where soils are or can be remediated such that the contamination levels do not exceed the NES-CS guideline values, they can be repurposed on Site. Any soils which exceed the NES-CS guideline values for residential land use will be removed from the Site and disposed off at an appropriate facility in accordance with condition 50(b)(iv) of the Proposed SDC Conditions.

10.95 For the balance of the Site (other than the hotspot areas), soils are considered suitable for the Project and may be retained or reused on Site, either as managed fill or as cleanfill.¹⁴⁶

10.96 Through implementation of the Remediation Action Plan, ENGEO concludes that the risks of contamination can be appropriately managed.¹⁴⁷ In terms of risks of contamination to sensitive receptors, ENGEO concludes that:

- (a) Risks to groundwater will be low due to the depth of groundwater on the Site.¹⁴⁸
- (b) The potential for contaminant mobilisation throughout the Site is limited by the relatively flat topography and will be further minimised through appropriate erosion and sediment control measures.¹⁴⁹

10.97 ENGEO's Detailed Site Investigation is comprehensive and through the proposed remediation actions (to be confirmed through the Remediation Action Plan), the Project will ensure that any risks of contamination are addressed and that the Site is made suitable for residential land use. The Proposed SDC Conditions require provision of a detailed Site Validation Report in accordance with the relevant Ministry for the Environment guidelines (Proposed SDC Conditions, condition 52), and they also impose specific requirements relating to the accidental discovery of contamination which is not otherwise addressed through the Remediation Action Plan (Proposed SDC Conditions, condition 57). Through these measures, the Project will ensure that any contamination is appropriately remediated and/or removed from the Site such that any risks of contamination to people and/or the ecological health and functioning of the Site are avoided or minimised to appropriate levels.

10.98 Through these measures, the Project will be consistent with the outcomes sought through the NES-CS, the CRPS, the LWRP, the District Plan and the IMP.

¹⁴⁵ Attachment 23, Detailed Site Investigation, section 9.1.

¹⁴⁶ Attachment 23, Detailed Site Investigation, section 9.3.

¹⁴⁷ Attachment 23, Detailed Site Investigation, section 9.2.

¹⁴⁸ Attachment 23, Detailed Site Investigation, section 9.5.2.

¹⁴⁹ Attachment 23, Detailed Site Investigation, section 9.5.2.

11 Information about Treaty settlements that apply to the area in which the Site is located (clause 5(1)(i), Schedule 5)

- 11.1 The Project is located within Te Waipounamu, a large part of which sits within the takiwa of the Ngāi Tahu Whānui. That area is subject to the Deed of Settlement between Her Majesty the Queen in right of New Zealand and Te Rūnanga o Ngāi Tahu. The settlement dated 21 November 1997 records the matters required to give effect to the settlement of all of Ngāi Tahu's historical claims. The settlement is implemented in a legislative sense through the Ngāi Tahu Claims Settlement Act 1998.
- 11.2 The TEcIA identifies that the Site may provide foraging and/or nesting habitat for bird species which are identified as Taonga Species in Attachment 12.148 to the Deed of Settlement. The Ngāi Tahu Claims Settlement Act 1998 acknowledges the cultural, spiritual, historic and traditional association of Ngāi Tahu with the Taonga Species.¹⁵⁰ In recognition of that association, the Act includes specific directions for the Director General of Conservation to engage with Te Rūnanga o Ngāi Tahu in relation to policy decisions concerning those species.
- 11.3 The TEcIA addresses the effects of the Project on the ecological features of the Site which include birds that are identified as Taonga Species. Through the implementation of a bird management plan and through the measures taken to enhance nesting and foraging opportunities for birds on Site, the TEcIA concludes that the Project will have a very low adverse effect on birds and will generate a net gain positive effect for common native birds.
- 11.4 There are no other specific principles and provisions in the settlement, including statutory acknowledgements, that specifically apply to the Site or the Project more generally.
- 11.5 The Site is not land that has been or is required to be returned under the Ngāi Tahu Claims Settlement Act 1998.

12 Relevant customary interests (clause 5(1)(j), Schedule 5)

- 12.1 There are no relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou, or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011.

13 The conditions that the Applicant proposes for the resource consent (clause 5(1)(k), Schedule 5)

- 13.1 Proposed conditions for the SDC resource consents and the ECan resource consents are included as Attachment 6 and Attachment 7.
- 13.2 Draft versions of the proposed conditions were provided to the Rūnanga Representatives on 2 July 2026. The Rūnanga Representatives confirmed that they do not have comments at this stage on the resource consent conditions but intend to provide comment in response to the invitation that will be issued under section 53 of the FTAA.
- 13.3 The proposed conditions for those resource consents will be provided to both local authorities at the same time that this substantive application is lodged. HDL will continue to work with those local authorities in the lead up to the formal comment period to address any feedback that they may have on the proposed conditions prior to formal comments being provided.

¹⁵⁰ Ngāi Tahu Claims Settlement Act 1998, section 288.

14 Notice received under section 30(3)(b) (clause 5(1)(l), Schedule 5)

- 14.1 Notice from ECan was received on 29 June 2026 confirming that there are no existing resource consents for the Site to which sections 124C(1)(c) or 165ZI of the RMA would apply.¹⁵¹ A copy of that notice is included as **Attachment 24**.

15 Permitted activities involved in the Project (clause 5(5)(a), Schedule 5)

- 15.1 A full list of the permitted activities, including an assessment of the relevant activities against the conditions of each permitted activity rule, is included as **Attachment 25**.

16 Assessment against planning documents prepared by a customary marine title group or an environmental covenant prepared by ngā hapū o Ngāti Porou (clause 5(5)(b), Schedule 5)

- 16.1 There are no such relevant planning documents. Therefore, no assessment is required.

17 Assessment of the effects of the Project on the use or management of a taiāpure-local fishery, a mātaihai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996 (clause 5(5)(c), Schedule 5)

- 17.1 The Project will not occur in a taiāpure-local fishery, a mātaihai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996. Therefore, no assessment is required.

18 Assessment of effects on the environment (clause 5(4), Schedule 5)

An assessment of the actual or potential effects on the environment (clause 6(1)(a), Schedule 5)

- 18.1 The Project will have actual or potential effects relating to the following:

- (a) character and amenity effects;
- (b) transport;
- (c) infrastructure and servicing matters – stormwater, wastewater, and water supply;
- (d) natural hazards;
- (e) noise;
- (f) aquatic and terrestrial ecology;
- (g) contamination;
- (h) earthworks/construction activities; and
- (i) economic wellbeing and housing supply.

- 18.2 The Project's effects on the environment have been considered by HDL's technical experts in the reports accompanying the substantive application. The following section addresses the

¹⁵¹ FTAA, section 30(b).

findings of those experts in light of the relevant directions from the planning documents and accounting for the draft conditions proposed in relation to the resource consents. In summary, HDL's planning experts conclude that the Project will result in a number of positive effects on the environment and that the design and layout of the Project in conjunction with the Proposed SDC Conditions and Proposed ECan Conditions will ensure that any adverse impacts of the Project will be appropriately avoided, remedied or minimised.

Urban form, density and character (including landscape and visual matters)

18.3 Accounting for the relevant matters of discretion and assessment criteria in the District Plan,¹⁵² the potential effects of the Project relating to urban form, density and character include effects on the existing amenity and character of the surrounding environment; on-site residential amenity effects; and effects relating to pedestrian legibility, connectivity and safety.

18.4 These effects have been considered by Urban Acumen in its UDA.

Existing character and amenity effects of the wider environment and adjoining neighbours

18.5 The UDA identifies that the Project has the potential to generate effects on the existing character and amenity values of the surrounding environment due to the number and intensity of dwellings that it will enable compared to what is anticipated by the District Plan for the Site.¹⁵³

18.6 The UDA nevertheless concludes that those effects are acceptable from an urban design perspective because:¹⁵⁴

- (a) The character of the Project remains low-density overall and the suburban core of the Project (where the smaller lots will be concentrated) is consistent with other suburban development within Darfield. In that respect, the range of housing provided as part of the Project reflects typologies already present in Darfield.
- (b) The Project's subdivision pattern also aligns with both new and old residential development in Darfield, with long straight streets providing long distance views toward the Southern Alps.
- (c) Locating the smaller lots within the centre of the Site will also ensure that the differences in character generated by the suburban core of the Project compared to the LLR zone character are internalised within the Site. Locating the largest lots around the perimeter of the Site (which more closely align with the LLR zone lot sizes) will ensure that the existing amenity values for adjoining properties are maintained.
- (d) Locating the largest lots around the perimeter of the Site removes potential overlooking and reverse sensitivity effects by limiting the number of new dwellings at the external boundaries. It also enables generous setbacks from external properties, providing the opportunity for planting to soften and screen these interfaces.
- (e) Landscaping initiatives are consistent with other suburban developments in Darfield, retaining the current experience of the Site when viewed from adjoining roads (including the retention of the shelterbelt, the provision of planted bunds, and the use of rural style fencing), with planting and fencing intentionally selected to deliver a more rural aesthetic.

¹⁵² District Plan, UG-MA1, SUB-MAT1, SUB-MAT2.

¹⁵³ Attachment 3, UDA, pages 80-81.

¹⁵⁴ Attachment 3, UDA, pages 80-81.

- 18.7 Through these measures, the UDA concludes that the effects of the Project on the wider character and amenity of the immediately surrounding environment and Darfield generally will be acceptable.¹⁵⁵

On-site character and residential amenity effects

- 18.8 The UDA identifies that the Project has the potential to generate adverse effects on the character and amenity values enjoyed by future residents within the Site, including loss of privacy, on site amenity, sunlight access and open to access space.¹⁵⁶
- 18.9 The UDA also concludes that those potential adverse effects will be satisfactorily addressed through the adoption of thoughtful design techniques and future development controls that ensure good urban design outcomes are achieved.¹⁵⁷ Specifically:
- (a) The carefully designed layout of the Project will maintain an overall low-density suburban character by way of generously proportioned streets, landscaping and public open space areas contributing to a sense of spaciousness for all future residents, including those located in the suburban core of the Site.
 - (b) The orientation of all lots also maximises sunlight and views, with setback requirements included for the Qualifying Allotments to ensure overlooking and adverse privacy effects are avoided.¹⁵⁸
 - (c) A minimum area of outdoor space must be provided within all Qualifying Allotments which will contribute to the amenity of the Qualifying Allotments and the overall sense of spaciousness.¹⁵⁹
 - (d) The retention of the existing landscape features and the landscaping of the proposed open spaces will contribute to a distinctive neighbourhood character for residents, while enabling them to identify with the wider landscape.

Residential safety and pedestrian legibility

- 18.10 The Project has incorporated Crime Prevention through Environmental Design principles, with the layout and design of the subdivision promoting safe movement, surveillance and a clear and legible neighbourhood structure.¹⁶⁰
- 18.11 In particular:¹⁶¹
- (a) The street-based layout, the high levels of connectivity and clear hierarchy of movement networks will support accessibility and wayfinding.
 - (b) The layout and sizing of the suburban core of the Project has been designed to achieve a high level of permeability and legibility, consistent with the subdivision rules for walkable blocks for the General Residential zone (as there is no LLR zone equivalent). The Project also includes a network of shared paths with a high coverage of the Site and an upgraded shared path connection to the town centre, located approximately 1km away.

¹⁵⁵ Attachment 3, UDA, page 81.

¹⁵⁶ Attachment 3, UDA, page 81.

¹⁵⁷ Attachment 3, UDA, page 81.

¹⁵⁸ Attachment 6, Proposed SDC Conditions, condition 22.

¹⁵⁹ Attachment 6, Proposed SDC Conditions, condition 22.

¹⁶⁰ Attachment 3, UDA, pages 76-77.

¹⁶¹ Attachment 3, UDA, pages 74-75, 78.

- (c) The orientation of dwellings, open space design, fencing and glazing requirements provide for natural surveillance of public areas.
- (d) The design reinforces a clear demarcation between public and private space, avoiding high fences adjoining public spaces to enable real and perceived passive surveillance.
- (e) The design and layout of the Project will ensure that public streets are activated through the placement of housing and have a spacious green feel.

18.12 Through these initiatives, the Project will ensure that any adverse effects on residential safety resulting from the design and layout of the Project are avoided. The Project will also deliver good connectivity within the Site and to the existing Darfield township.

Summary

18.13 The UDA concludes that the Project will provide for a high-quality residential environment where residents can:¹⁶²

- (a) have a choice of section size and location;
- (b) enjoy outlook to the adjacent rural environment and towards the Southern Alps from public streets and spaces;
- (c) benefit from a connected walking and cycling network to access neighbours and Darfield's town centre, school and other services;
- (d) enjoy a safe, attractive public realm of streets and reserves;
- (e) socialise and play in a variety of open spaces that offer both passive and active recreation opportunities; and
- (f) enjoy high-quality private indoor and outdoor living spaces.¹⁶³

Transport

18.14 Accounting for the relevant matters of discretion in the District Plan, there are potential transport effects of the Project relating to:¹⁶⁴

- (a) Additional traffic volumes during construction of the Project and resulting traffic from occupation of the proposed residential lots.
- (b) The provision of access directly onto Bangor Road which is a State Highway with a speed limit exceeding 60km/h.
- (c) The design and layout of the internal road network.

18.15 The transport effects of the Project have been assessed by Novo Group in the ITA.

¹⁶² Attachment 3, UDA, page 79.

¹⁶³ District Plan, policy SUB-P3(6).

¹⁶⁴ District Plan, TRAN-MAT1, TRAN-MAT2, and TRAN-MAT5.

Traffic generation

18.16 The ITA confirms that the Project will result in increased traffic volumes on the surrounding road network beyond what is already anticipated through the existing LLR zoning, with Bangor Road being used as the only access to and from the Site (until a future connection can be provided through Cridges Road).

18.17 The ITA addresses the effects of the increased traffic volumes from the Project on the intersections between Bangor Road / SH 77 and West Coast Road / SH 73, and between Bangor Road and McLaughlins Road which are the primary routes to the Site. In short, the ITA identifies that:¹⁶⁵

- (a) Without further upgrades, the Bangor Road / SH 77 and West Coast Road / SH 73 intersection could only accommodate traffic generated by 550 lots associated with the Project. Beyond the traffic volume generated from 550 lots, the Project would degrade the level of service provided by the intersection to worse than 'D', which is considered over capacity.
- (b) The intersection between Bangor Road and McLaughlins Road could accommodate traffic volumes from the Project (at full build out). However, observed driver behaviour indicates that the shoulders and berms on that intersection are currently being used to pass right turning traffic onto Bangor Road, which is unsatisfactory from a safety and efficiency perspective.

18.18 In response to these findings, Novo Group has recommended:

- (a) Upgrading the Bangor Road and McLaughlins Road intersection as part of the Project to address the existing unsatisfactory operation of this intersection and to address any additional impact that the Project would have on the operation of this intersection.
- (b) Inclusion of a condition of resource consent which requires the upgrade of the Bangor Road / SH 77 and West Coast Road / SH 73 intersection prior to the delivery of more than 550 lots, unless NZTA provides confirmation that the intersection upgrade is not required to service traffic volumes from the Project associated with more than 550 lots. A concept arrangement for this upgrade is included as Appendix 14 to the ITA.

18.19 HDL has accepted both of these recommendations, which are included as condition 18 of the Proposed SDC Conditions. In accordance with Novo Group's recommendations, HDL has also agreed to undertake the upgrades to the Bangor Road frontage of the Site described in the ITA, including providing appropriate lane widths, kerb and channel and improvements including right turn-bays at the access points to the Site, and the upgrade of the existing shared path along the southern side of Bangor Road and a dedicated refuge island on Bangor Road.

18.20 Through these measures, Novo Group concludes that the volume of traffic generated from the Project can be safely and efficiently accommodated within the road network.¹⁶⁶

Bangor Road access

18.21 Consistent with the ODP and advice of NZTA, the Project has limited access to the Site from Bangor Road only – no access is provided to West Coast Road / SH 73. Two accesses to the

¹⁶⁵ Attachment 13, Integrated Transport Assessment, at [95] – [107].

¹⁶⁶ Attachment 13, Integrated Transport Assessment, at [116], [136] and [137].

Site from Bangor Road / SH 77 are provided, referenced in the ITA as the western access and the eastern access (which is the main access closest to Darfield township).

18.22 Both accesses have the potential to generate adverse effects on the safe and efficient operation of the State Highway.

18.23 As outlined above and in further detail in the ITA, specific upgrades along Bangor Road are proposed to address those effects. They include appropriate lane widening at the access points and the delivery of kerb and channel along the Site frontage at both intersections. Right turn bays will also be provided as shown in Appendix 2 of the ITA to deliver dedicated lanes for entering the Site. The intersections into the Site along Bangor Road are also sufficiently separated to ensure clear sightlines for traffic using these intersections and to enable drivers to identify the intersections and stop and reach if necessary.¹⁶⁷

18.24 With the implementation of these measures, Novo Group concludes that the accesses to Bangor Road delivered by the Project will be acceptable and will protect the ongoing functioning of the State Highway.¹⁶⁸ For completeness, Novo Group identifies that a reduction in the speed limit along Bangor Road would further support the safety and efficiency of the intersections with the Site, but finds that such a reduction is not required to secure an appropriate outcome.¹⁶⁹ The upgrades proposed for the Project are sufficient to address any adverse effects in the context of the existing speed limits.¹⁷⁰

The internal road network

18.25 As Novo Group identifies, the Project results in a number of non-compliances with the relevant District Plan standards which control the design of the roading network. These non-compliances however are primarily the consequence of the Project being designed to accommodate smaller lots (within the suburban core of the Project) which more closely reflect the General Residential zone outcomes rather than the LLR zone.

18.26 With respect to road carriage widths, Novo Group concludes that design of the roads within the Project will ensure that they achieve the intended function of the roads, being either a Collector Road (in the case of Road 1) or as Local Roads that will service a higher density of housing than is anticipated by the LLR. Novo Group concludes that the proposed road designs are therefore fit for purpose and suitable.¹⁷¹

18.27 In relation to intersection spacings, Novo Group concludes that the internal intersections with Road 1 will be acceptable as they all have more than five seconds of travel time between the spacings, consistent with the relevant guidelines.¹⁷² The subdivision layout has been designed to minimise cross-intersections, consistent with the Engineering Code of Practice.

18.28 Finally, in relation to vehicle crossings, Novo Group identifies that with the exception of six lots, all lots will comply with the separation distances prescribed by the District Plan. For the six lots which do not comply, Novo Group conclude that there is sufficient space along the width of each lot to ensure acceptable visibility for vehicles passing and/or accessing the lots.¹⁷³

¹⁶⁷ Attachment 13, Integrated Transport Assessment, at [69].

¹⁶⁸ Attachment 13, Integrated Transport Assessment, at [88] and [91].

¹⁶⁹ Attachment 13, Integrated Transport Assessment, at [121].

¹⁷⁰ Attachment 13, Integrated Transport Assessment, at [120].

¹⁷¹ Attachment 13, Integrated Transport Assessment, at [79].

¹⁷² Attachment 13, Integrated Transport Assessment, at [82].

¹⁷³ Attachment 13, Integrated Transport Assessment, at [68].

Summary

18.29 Through the design and layout of the Project and the upgrades proposed as part of the Project, Novo Group concludes that the transport related effects of the Project will be less than minor and acceptable.¹⁷⁴

Infrastructure and servicing

18.30 The maximum wastewater flows from the Project have been calculated by DLS to be 16.9 l/s which is well within the Selwyn Water flow allowance for this northern eastern side of Darfield.¹⁷⁵ The estimated peak water supply demand design flow for the Project is 120 l/s.¹⁷⁶ The addition of significant hardstand throughout the Site as a result of the Project will have a consequential effect on the way in which stormwater is managed on the Site.

18.31 The Project therefore has the potential to affect the capacity of the existing water supply and wastewater network and the management of stormwater and its effects on people, property and the wider environment. The effects of the Project on these features have been assessed by DLS in the Infrastructure Assessment.

18.32 The Infrastructure Assessment confirms that:¹⁷⁷

- (a) There is sufficient capacity within Selwyn Water's wastewater network to accommodate the additional flow volumes from the Project provided a low pressure sewer system is utilised. With the intended implementation of that system (secured by Proposed SDC Conditions, condition 10), the Project will not have any adverse effects on the functioning of the network or its availability to service existing demand.
- (b) There is similarly sufficient capacity within Selwyn Water's water supply facilities to service the Project and due to the construction of the pipe connection within the Project to support a more efficient delivery of water supply the Project will have a positive effect on the functioning of Selwyn Water's water supply network.

18.33 With reference to the matters of discretion in the LWRP,¹⁷⁸ matters relevant to the proposed discharge of operational stormwater and its effects on the wider environment include:

- (a) The quality of, compliance with and monitoring of the SMP prepared to address the management of stormwater in the catchment.
- (b) The rate and volume of discharge and the changes to the flow regime of a river or artificial watercourse; flood frequency (including flooding of land or dwellings); and erosion of riverbank and channels.
- (c) The concentration of contaminants and resulting actual and potential adverse environmental effects (including cumulative effects) on the receiving water quality of surface and groundwater, aquatic ecosystems, Ngāi Tahu cultural values and other existing uses and users of the water, including takes and discharges.
- (d) Measures to reduce the volume and concentration of contaminants in the discharge; ensure the volume and rate of discharge do not exceed the capability of the soil and

¹⁷⁴ Attachment 13, Integrated Transport Assessment, at [137].

¹⁷⁵ Attachment 4, Infrastructure Assessment, at [5.2].

¹⁷⁶ Attachment 4, Infrastructure Assessment, at [6.2].

¹⁷⁷ Attachment 4, Infrastructure Assessment, at [5.2] and [6.2].

¹⁷⁸ LWRP, 5.93.

subsoil layers at the Site to reduce contaminant concentrations in the discharge and the infiltration capacity of the soil and subsoil layers; avoid the accumulation of toxic or persistent contaminants in the soil and subsoil layers; and minimise suspended sediment in stormwater from earthworks.

18.34 These matters have been considered by DLS in the design of the operational stormwater network for the Project. A draft SMP which complies with the relevant guidance by ECan is included as **Attachment 19**. The consent conditions require the certification of the SMP by ECan and the operational stormwater network must comply with the requirements of the SMP (Proposed ECan Conditions (Operational Phase Stormwater), conditions 16 and 18). No operational stormwater will discharge to, or otherwise affect, the Waterways or their flow rate. With respect to the matters outlined in paragraph 18.33 (c) and (d) above:

- (a) The proposed soakpits will be located throughout the Site to collect stormwater from small catchments, ensuring the discharge of stormwater is spread over the Site. The high permeability of the subsurface gravels will ensure that any localised increase in groundwater directly beneath the soakpits will drain quickly during heavy rainfall events.
- (b) The soakpits themselves will be designed to ensure that stormwater will discharge to ground at an appropriate rate for the infiltration available at the location of each soakpit. This will account for the relative depth to groundwater in that location and the infiltration capacity of the soil and subsoil layers.
- (c) The likely contaminant loading in operational stormwater from residential developments in Selwyn has been assessed by Pattle Delmore Partners (*PDP*) on behalf of SDC. A copy of that report can be accessed [here](#). From untreated samples taken from within the kerb and channel, PDP concluded that:
 - (i) The common contaminants of residential stormwater runoff are, with the exception of E-Coli, well below maximum allowable values for drinking water (Drinking water Standards NZ) over a range of first flush events between 1.3 and 9.2 mm/hr intensities.
 - (ii) No petroleum hydrocarbons in the residential stormwater run-off were detected.
- (d) DLS considers that the results from the PDP Report and the similarities between what was assessed by PDP and the Project provide sufficient confidence that the post construction stormwater discharge from the Site will have a similarly low contaminant loading. Further, unlike the development tested by PDP, the Project will include submerged outlet sumps with the capacity to store >60l floatable contaminants. These sumps will be maintained in accordance with the SMP and will ensure hydrocarbons and contaminated sediments are removed and disposed of appropriately before they can enter the soakpits.
- (e) In summary, with the treatment provided through the soakpits and sumps and the filtration from the depth of undisturbed material (between ground level and groundwater), the effects on groundwater quality and downstream water users from the discharge of post-construction stormwater will be less than minor.

Natural hazards

- 18.35 The effects of natural hazards on the Project and the effects of the Project on natural hazard risk to the wider environment have been assessed by ENGEO and DLS.
- 18.36 ENGEO has confirmed that the Site is not subject to any risks associated with erosion, land instability or liquefaction and the Project will not exacerbate those risks for surrounding properties.
- 18.37 In terms of fluvial flood hazard, the Site may experience potential effects in the 1 in 200-year (0.5% AEP) and a 1 in 500-year (0.2% AEP) events. Specifically, flood mapping undertaken by ECan and SDC indicates that the Site would experience water depths of no more than 0.5m in those critical events, with no part of the Site comprising a high hazard area. To address the potential effects of anticipated floodwater depths:
- (a) The stormwater network will be designed to accommodate rainfall events for up to a 2% AEP event. Additional storage for overland flows and rainfall will be provided in roadside swales, and the roading network will be designed to provide secondary conveyance of flood flows exceeding the 2% AEP event, directing those flows through the secondary flow network within the Site to discharge at pre-development discharge locations.
 - (b) Modelling undertaken by DLS confirms that the Project will not exacerbate any flooding experienced by properties located downstream of the Site beyond pre-development conditions in terms of water volume or velocity. Through the inclusion of dedicated soakage facilities as part of the Project, flood flows downstream of the Site will be reduced in a post development scenario.
 - (c) Consent notices will be registered on all of the titles issued for all of the created lots to require dwellings to be constructed to achieve a finished floor level of at least 300mm clearance above the 1 in 200-year (0.5% AEP) event (consistent with the requirements of the CRPS).
- 18.38 With those measures in place (and secured by conditions of resource consent), that effects of flooding on the Project will be appropriately managed such that they are negligible. The Project will also not exacerbate any flood displacement effects for surrounding properties.

Noise

- 18.39 With the Site's proximity to the State Highway network (SH 73 and SH 77) and the Midland Rail Line, the Project has the potential to generate reverse sensitivity effects related to noise and vibration on the functioning of that infrastructure.
- 18.40 The noise generated from the State Highways and the Midland Rail Line has been assessed by Marshall Day (Attachment 20). That assessment has considered the effects of that noise on residential amenity within the Project as well as the potential for reverse sensitivity effects.
- 18.41 As Marshall Day identifies, the Project includes specific noise treatments along the boundaries with both West Coast Road / SH 73 and Bangor Road / SH 77 which are intended to attenuate noise from the State Highway and the Midland Railway Line.
- 18.42 Through these measures, Marshall Day concludes that:¹⁷⁹

¹⁷⁹ Attachment 20, Sound Level Assessment, at sections 5 and 6.

- (a) The majority of future dwellings established along the boundaries of SH 73 and SH 77 will comply with the permitted *outdoor* noise requirements in the District Plan. For the dwellings which do not comply, Marshall Day concludes that the adverse effects on residential amenity resulting from noise generated by the State Highway are likely to be acceptable on the basis that there is sufficient space within those lots to provide outdoor areas which will achieve compliance with those noise levels. The consenting pathway available through the District Plan will provide sufficient opportunity to assess those effects and to identify further mitigation opportunities.
- (b) Compliance with the permitted *indoor* noise requirements can be achieved either through the positioning of dwellings beyond 50m from the boundaries of the State Highways (with appropriate noise control barriers) or through the design and construction of the dwellings to achieve the indoor noise levels identified in the District Plan.

18.43 With the noise treatment measures proposed, Marshall Day concludes that residential amenity (indoor or outdoor) will not be adversely affected by noise generated from the adjoining State Highways and Rail line and that adverse reverse sensitivity effects on that infrastructure will be avoided.¹⁸⁰

Aquatic and terrestrial ecology

18.44 The potential effects of the Project on the terrestrial and aquatic ecology values of the Site are summarised in the TEcIA (Attachment 12) and the Aquatic Ecology Assessment (Attachment 11) and include potential effects to birds and lizards and their habitats resulting from land disturbance and construction activities, and potential effects on fish and macroinvertebrates within the Waterways resulting from the realignment and enhancement activities.

18.45 The TEcIA confirms that following the implementation of avoidance, minimisation, and remediation measures, the Project will have very low impacts on terrestrial ecological features or will deliver a net gain in ecological outcomes for the Site. The measures proposed are consistent with the effects management hierarchy set out in the NPS-IB and include:

- (a) Implementation of a Bird Management Plan, which will include construction-related measures to avoid disturbance during nesting periods, measures to discourage nesting within construction areas, accidental discovery protocols and habitat enhancement measures in the reserve areas to improve nesting and foraging.
- (b) Implementation of a Lizard Management Plan, which includes identification and protection of lizard habitat, establishment of a dedicated lizard release area and new dryland ecosystem habitat, construction-related measures to avoid impacts on lizards, salvage and relocation, accidental discovery protocols and the creation of high-quality lizard habitat.
- (c) Native planting, riparian restoration and enhancement, establishment of a dedicated dryland ecosystem habitat area, weed removal, retention of mature vegetation where practicable, and development of ecological corridors and greenspaces to improve habitat availability and connectivity.

18.46 The Aquatic Ecology Assessment confirms that the adverse effects of the Project on the ecological values of the Waterways and their physical habitat will be less than minor and,

¹⁸⁰ Attachment 20, Acoustic Report, at sections 8.2 and 9.

through the enhancement of the works proposed, there will be a positive overall effect on the habitats within the Waterways for fish and macroinvertebrates.¹⁸¹ The measures recommended by the Aquatic Ecology Assessment to avoid or minimise effects on the ecological values of the Waterways have been included as conditions of resource consent (Proposed SDC Conditions, conditions 43, 44 and 48; Proposed ECan Conditions (Construction Phase Stormwater), conditions 20 – 22), including specific design requirements for the realigned and enhanced Waterway 1 and the implementation of a Fish Management Plan.

Contamination

18.47 ENGEO has identified that there are discrete areas of the Site which contain soils with contamination levels that exceed the relevant NES-CS guideline values for residential land use. Without remediation, disturbance of these contaminated soils could result in adverse effects on the ecological functioning and health of the Site and its features and in adverse effects on the health and safety of people, including construction workers handling the contaminated soils and future residents.

18.48 For those discrete areas described in the Detailed Site Investigation, ENGEO has recommended the remediation and/or removal of contaminated soils in accordance with the Remediation Action Plan, required as a condition of resource consent (Proposed SDC Conditions, condition 50). The required contents of the Remediation Action Plan have been designed in consideration of the directions in the NES-CS matters of discretion and will ensure that any adverse effects of the contaminated soils on human health and the environment will be addressed including during the remediation and/or removal process.

Construction stormwater

18.49 The primary contaminant for construction-related stormwater is sediment that can become entrained in the stormwater as a result of the land disturbance. As a result, the discharge of construction stormwater can generate effects on the surrounding environment. With reference to the relevant matters of discretion under the LWRP, these effects may include:

- (a) effects on the quality of surface water, aquatic ecosystems, and Ngāi Tahu cultural values;
- (b) effects on the quality and safety of human and animal drinking water; and
- (c) effects of the quantity of water to be discharged on the banks or bed of a waterbody or on its flood carrying capacity and on the capacity of the network to convey that discharge.

18.50 Through the following measures, the Project will ensure that any effects on these features are avoided or minimised:

- (a) In accordance with the construction SMP required by the Proposed SDC Conditions, construction stormwater will be captured and conveyed to temporary soakpits, where it will discharge to ground. It will not intercept with, or discharge to, the Waterways. Consequently, construction stormwater resulting from the Project will not generate effects on the quality of surface water, aquatic eco-systems or Ngāi Tahu cultural values.

¹⁸¹ Attachment 11, Aquatic Ecology Assessment, at page 12.

- (b) The closest community water supply bores are BX22/0006 and L35/0980 which are located to the north of the Site. Given the depth to groundwater from the Site and the flow direction of groundwater flows, the discharge of construction stormwater will not generate effects on the quality of water from these wells. As a result, no specific treatment methods are considered necessary. Nevertheless, dedicated erosion and sediment control measures will be implemented to ensure that the sediment loading in construction stormwater is minimised as far as possible.
- (c) Construction-related stormwater is a necessary consequence of developing land for housing in the Selwyn district and will support the construction of 741 allotments for new dwellings.

18.51 Overall, through the implementation of the relevant mitigation measures, the effects of construction-related stormwater on the environment are considered to be less than minor.

Earthworks/construction activities

18.52 As with any larger scale residential development, there will be a range of earthworks and construction-related effects to be managed during the construction of the Project. Relative to the relevant matters of discretion and assessment criteria in the District Plan (as applicable), these effects include:

- (a) Adverse effects from earthworks on visual amenity, landscape and character, outlook, drainage.
- (b) Construction hours and duration.
- (c) Dust and sediment effects.
- (d) Construction noise and vibration.
- (e) Construction related traffic generation.

18.53 The scale of the Site and its relative distance from sensitive receivers will mean that the majority of these effects (particularly those relating to visual amenity) are largely internalised and/or will comply with the relevant permitted standards in the District Plan or the LWRP. Nevertheless, specific initiatives are proposed to ensure that earthworks and construction-related effects on the surrounding community and the environment are avoided or minimised. In particular:

- (a) Condition 56 of the Proposed SDC Conditions limits when construction activities can occur on the Site to between 7:30am and 6:00pm, Monday to Saturday. No construction works or heavy vehicle movements are to be undertaken on Sundays or public holidays.
- (b) Dust and sediment and erosion-related effects will be managed through the implementation of an ESCP which will include a DMP.
- (c) Construction noise and vibration from the Project will comply with the relevant permitted standards in the District Plan.
- (d) Construction traffic for the Project will be managed in accordance with a Construction Traffic Management Plan (CTMP), required as condition of resource consent (Proposed SDC Conditions, condition 37).

Positive effects

18.54 The economic effects of the Project, including on the availability of housing in Darfield and the wider Selwyn district are addressed in the Economic Assessment Update. In summary, the Project will:

- (a) Significantly increase the housing supply in Darfield on land zoned for residential purposes to help meet housing needs and to support a more competitive greenfield low-density market in the short-medium term.¹⁸²
- (b) Generate at least \$458 million of total direct, indirect and induced value added for the regional economy¹⁸³ and sustaining:¹⁸⁴
 - (i) approximately 118 full-time equivalent (FTE) jobs (on average) associated with design, infrastructure upgrades and civil construction over an 8.5-year delivery period; and
 - (ii) approximately 273 FTE jobs (on average) associated with building construction over a 10-year delivery period.
- (c) Deliver upgrades to the surrounding transport network which will have economic benefits for the wider community, including the upgrade of Bangor Road / McLaughlins Road, the upgrade of the shared path along Bangor Road, and the proposed upgrade of the intersection between Bangor Road / SH 77 and West Coast Road / SH 73 (if required).¹⁸⁵
- (d) Provide for connections to the Darfield reticulated water supply and wastewater network that will have larger capacity to accommodate future development around the Site without creating any financial burdens or disbenefits for SDC's infrastructure and investment planning.¹⁸⁶

18.55 In addition to these benefits, the Project will also generate a net positive ecological outcomes for lizards through the creation of dedicated habitat areas on Site, and for birds through the proposed increase in indigenous planting across the Site which will provide improved foraging and nesting opportunities. The proposed enhancement of the Waterways will also generate positive effects for the ecological health of the Waterways and the species and habitat that they support.

An assessment of the risks associated with hazardous installations (clause 6(1)(b), Schedule 5)

18.56 There will be no hazardous installations associated with the Project.

An assessment of the risks associated with discharge of contaminants (clause 6(1)(c), Schedule 5)

18.57 An assessment of the risks associated with the discharge of construction and operational stormwater which may contain contaminants is set out at paragraphs 18.30 – 18.34 and paragraphs 18.49 – 18.50.

¹⁸² Attachment 15, Economic Assessment Update, at [44] – [46]; Appendix – Economic Impact Assessment, at [3.2].

¹⁸³ A net present value of \$272 million at an 8% discount rate.

¹⁸⁴ Attachment 15, Economic Assessment Update, Table 2A.

¹⁸⁵ Attachment 15, Economic Assessment Update, at [22].

¹⁸⁶ Attachment 15, Economic Assessment Update, at [15].

A description of the mitigation measures to be undertaken to reduce actual or potential effects (clause 6(1)(d), Schedule 5)

18.58 The following mitigation measures are proposed to prevent or manage the actual and potential effects of the Project during construction:

- (a) Construction activities including earthworks will be undertaken in accordance with the following management plans to be certified by SDC and/or ECan:
 - (i) An ESCP including a DMP (Proposed SDC Conditions, condition 32; Proposed ECan Conditions (Construction Phase Stormwater), condition 12).
 - (ii) A construction SMP (Proposed SDC Conditions, condition 35).
 - (iii) A CTMP (Proposed SDC Conditions, condition 56).
 - (iv) A Fish Management Plan (Proposed ECan Conditions (Construction Phase Stormwater), condition 21).
 - (v) A Lizard Management Plan (Proposed Wildlife Conditions, condition 1).
 - (vi) A Bird Management Plan, (Proposed SDC Conditions, condition 39).
- (b) In addition, construction activities will be subject to the following conditions which seek to manage the effects of construction activities on key features of the Site and the surrounding environment (including adjoining neighbours):
 - (i) Erosion and sediment controls and general earthworks management measures (Proposed ECan Conditions, conditions 16 – 19, 23, 25, 27; Proposed SDC Conditions, condition 59).
 - (ii) Accidental discovery protocols (Proposed ECan Conditions (Excavation), condition 14; Proposed SDC Conditions, condition 58).
 - (iii) Construction hours and noise / vibration limits (Proposed SDC Conditions, condition 56).
 - (iv) Stormwater management measures (Proposed ECan Conditions (Construction Phase Stormwater), condition 23)

18.59 The Project also includes the following mitigation measures to address the actual and potential effects resulting from the Project once constructed:

- (a) To address actual and potential effects of the Project on landscape values and character and amenity, mitigation measures include:
 - (i) Adopting a subdivision layout which is similar to the patterns within existing neighbourhoods in Darfield, and adopting road widths and designs which reflect the more rural / peri-urban character of the township.
 - (ii) The placement of larger lots around the perimeter of the Site, with the smaller lots placed within the suburban core of the Site. The larger lots will ensure that the interface of the Site particularly with the properties to the north and west of the Site retains a more spacious, rural character.

- (iii) The use of planting and fencing which have been selected specifically to reflect and support a more rural aesthetic within the Site.
- (b) To mitigate any effects of the Project on residential amenity within the Site, the Project adopts specific land use controls for the suburban core (including setback requirements and outdoor space) to ensure high quality built form outcomes on the smaller lots. Crime Prevention Through Environmental Design principles have informed the layout of the Project, and generous reserve areas and landscaping have been located throughout the Site to enhance the overall amenity of the Project.
- (c) The provision of specific noise treatments along the boundaries of the State Highways and between individual allotments within the Site are the key mitigation measures intended to address the effects of noise from the State Highways and the Midland Rail line on future dwellings. Those treatments will also ensure that reverse sensitivity effects on that infrastructure are avoided.
- (d) To mitigate the effects of the Project on transport network, specific upgrades are proposed to the wider network, including upgrades along Bangor Road and to the intersection between Bangor Road / SH 77 and West Coast Road / SH 73.
- (e) To address the effects of the Project on three waters infrastructure, the Project will provide all necessary connections to the reticulated networks operated by Selwyn Water Limited, with enhanced capacity to accommodate future development from areas surrounding the Site in future.

Identification of persons who may be affected by the activity and any response to the views of persons consulted, including the views of iwi or hapū that have been consulted in relation to the Project (clause 6(1)(e), Schedule 5)

18.60 A list of the persons who may be affected by the Project and a description of the consultation undertaken with those parties in respect of the Project (including the views on behalf of mana whenua) is set out in the Affected Party Engagement Register at Attachment 16. That description also addresses the way in which HDL has responded to the views of persons consulted.

18.61 In summary:

- (a) In response to comments provided from the wider community, the Project has been designed to achieve consistency with the existing character of the Darfield township while also making a significant contribution to housing supply within the area on land that is zoned for residential purposes. The specific mitigation measures adopted to maintain the amenity and character of the environment are described in the preceding section.
- (b) In response to comments from Fonterra, the Project does not provide for any direct connections to the Northern Farm and larger lots have been placed on the northern boundary of the Site.
- (c) In response to engagement with NZTA, the Project has not provided any direct access to SH 73 / West Coast Road. To address potential reverse sensitivity effects relating to noise, the Project includes specific acoustic treatments along the boundaries of both State Highways.

- (d) As described in the proceeding section, HDL has consulted with Rūnanga Representatives in relation to the Project and the comments provided by the Rūnanga Representatives have directly informed the design and layout of the Project (as described further in Attachment 17).

18.62 Through the design and layout of the Project and the dedicated mitigation measures, HDL's consultant team considers that the adverse effects of the Project have been appropriately avoided, remedied or mitigated.

Any reasons iwi or hapū have elected not to respond when consulted (clause 6(1)(f), Schedule 5)

18.63 On 2 July 2026, HDL provided a copy of draft conditions for the Project to the Rūnanga Representatives along with an updated version of HDL's response to the comments provided by the Rūnanga Representatives on the referral application. HDL also contacted Te Rūnanga o Ngāi Tahu with an update about the substantive application for the Project. As outlined in Attachment 17, both Rūnanga Representatives advised that they did not have comments on the substantive application at this stage but would provide comments in response to the formal invitation to be issued by the expert panel under section 53 of the FTAA.

If the scale and significance of the Project's effects are such that monitoring is required, a description of how the effects of the Project will be monitored and by whom, if the Project is approved (clause 6(1)(g), Schedule 5)

18.64 The scale and significance of the Project's effects do not necessitate ongoing monitoring. Nevertheless, monitoring is proposed for the following aspects of the Project:

- (a) Erosion and sediment control.
- (b) Any operational effects of the Project on aquatic and terrestrial habitats.

Erosion and sediment control

18.65 An ESCP and DMP must be prepared and implemented as part of the Project.

18.66 The purpose of those management plans is to outline suitable dust, erosion and sediment control measures during all earthworks (including the proposed realignment of the water race) to ensure that:

- (a) all stormwater runoff from the Site is managed and controlled so that no silt, sediment or water containing silt or sediment is discharged into stormwater infrastructure or the water races; and
- (b) earthworks are managed and controlled so that dust resulting from those earthworks does not adversely affect neighbouring properties.

18.67 The practices and procedures set out in the ESCP and DMP will include the monitoring of earthworks and sediment control measures during construction to ensure the outcomes described in paragraph 18.66 (a) and (b) are achieved. Condition 32 of the Proposed SDC Conditions requires the ESCP (including a DMP) to be submitted to SDC for certification prior to earthworks works commencing.

18.68 Overall, the ESCP and DMP and the Proposed SDC and ECan Conditions will ensure that appropriate monitoring is undertaken in respect of potential effects arising from the earthworks.

Ecological monitoring

18.69 The Lizard Management Plan provides for post-salvage monitoring within Lizard Release Areas and states that monitoring may not be warranted if it is unlikely to provide any viable data. Therefore:

- (a) If fewer than 50 lizards are salvaged, no monitoring is necessary within the Lizard Release Area.
- (b) Otherwise, post-salvage monitoring should occur for at least five years, commencing 1 years following the completion of the release of lizards at the Lizard Release Area.

18.70 The Lizard Management Plan provides specific requirements, which includes predator monitoring. It also provides for noise bund colonisation monitoring to confirm whether skinks successfully colonise the habitat created on the noise bund.

18.71 The Proposed ECan Conditions (Construction Phase Stormwater) (conditions 20 and 21(g)) require the monitoring of effects of the Project on macroinvertebrate biodiversity and fish abundance following the completion of stream works.

An assessment of any effects on the Project on the exercise of a protected customary right (clause 6(1)(h), Schedule 5)

18.72 There are no protected customary rights which would apply to the Site or the Project. As such, the Project will not have any effect on the exercise of a protected customary right.

Any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic or cultural effects (clause 7(1)(a), Schedule 5)

18.73 The effects of the Project's design and layout on adjoining neighbours and the character of the wider environment are addressed at paragraphs 18.5 – 18.7. The economic effects of the Project are addressed at paragraph 18.54.

18.74 The effects of the Project on matters of value to Te Rūnanga o Ngāi Tūāhuriri and Te Taumutu Rūnanga have been considered as part of the design and layout of the Project and its intended construction. As part of that, specific guidance has been taken from the IMP and the Ngāi Tahu Subdivision and Development Guidelines. A full assessment of the Project against those Guidelines is included as Attachment 17. In addition, the Project has also been directly informed by previous consultation with the Rūnanga Representatives, as set out in Attachment 17.

18.75 HDL acknowledges that it is ultimately for the Rūnanga Representatives to confirm the extent of any effects of the Project on matters of value for Te Rūnanga o Ngāi Tūāhuriri and Te Taumutu Rūnanga. Notwithstanding, through the initiatives described in this Assessment and in Attachment 17, HDL has sought to ensure that the Project does not generate any adverse cultural effects.

Any physical effect on the locality, including landscape and visual effects (clause 7(1)(b), Schedule 5)

18.76 Section 8 of this Assessment addresses the physical effects of the Project on the surrounding environment, including landscape and visual effects.

Any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity (clause 7(1)(c), Schedule 5)

18.77 The effects of the Project on the terrestrial and aquatic values of the Site (including ecosystems and habitats) are addressed in paragraphs 18.44 – 18.46 above.

Any effect on natural and physical resource that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations (clause 7(1)(d), Schedule 5)

18.78 The effects of the Project on natural and physical resources with aesthetic and scientific values are addressed in section 8 above.

18.79 There are no recorded sites of historic significance within the Site. Nevertheless, an accidental discovery protocol will be in place during construction activities, as required by condition 58 of the Proposed SDC Conditions and condition 14 of the Proposed ECan Conditions (Excavation).

18.80 HDL is not aware of any natural and physical resources within the Site that have specific spiritual value. The importance of all natural and physical resources within Waitaha to the wellbeing of communities and to mana whenua in particular is nevertheless acknowledged. In that regard, the Project (in conjunction with the draft consent conditions) has been designed to ensure that:

- (a) Any adverse effects on the natural and physical features of the Site and its surrounds related to the construction the Project are avoided or minimised through the application of the measures outlined in paragraph 18.58 – 18.59 above. Specific consideration has been given to minimising the effects on the aquatic and terrestrial biodiversity within the Site (including the habitats it supports), recognising the interconnectedness of those features with the health of the wider environment.
- (b) Development of public realm within the Site is inviting to the wider community, offering high quality, varied reserve spaces and recreation opportunities to enhance the natural and physical environment for residents and visitors. HDL is open to further engagement with mana whenua on opportunities to integrate the narratives of Te Rūnanga o Ngāi Tūāhuriri and Te Taumutu Rūnanga into these areas to support increased knowledge and understanding of Te Ao Māori.
- (c) The positive effects of the Project for natural and physical resources, including the enhancement of the Waterways and the increased provision of habitat for terrestrial biodiversity, are long-lasting – secured through a commitment to regular maintenance.

Any discharge of contaminants into the environment and options for the treatment and disposal of contaminants (clause 7(1)(e), Schedule 5)

18.81 Paragraphs 18.33 – 18.34 and 18.49 – 18.51 address the effects of the proposed discharge of stormwater into the environment and the way in which stormwater discharge will be managed.

Any unreasonable emission of noise (clause 7(1)(f), Schedule 5)

18.82 The construction and operational noise effects of the Project are addressed in 18.39 – 18.43.

Any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations (clause 7(1)(g), Schedule 5)

18.83 The risks of the Project to the wider environment through natural hazards are addressed at paragraphs 18.35 – 18.38.

18.84 The Project does not include any hazardous installations.

19 Information required for an application for subdivision

The position of all new boundaries (clause 8(1)(a), Schedule 5)

19.1 The positions of all new boundaries to be created through the proposed subdivision of the Site are shown in the subdivision plans included as Attachment 1.

The areas of all new allotments, unless the subdivision involves a cross lease, company lease, or unit plan (clause 8(1)(b), Schedule 5)

19.2 The areas of all new allotments to be created through the proposed subdivision of the Site are shown in the subdivision plans included as Attachment 1.

The locations and areas of new reserves to be created, including any esplanade reserves and esplanade strips (clause 8(1)(c), Schedule 5)

19.3 The locations and areas of all new reserves to be created through the proposed subdivision of the Site are shown in the subdivision plan included as Attachment 1. Detailed plans (including cross-sections) of those reserves are included as part of the plans included in the Landscape Framework Report.

19.4 In summary, the new reserves comprise:

- (a) The primary farm / park style reserve in the centre of the Site.
- (b) Two smaller reserves, extending through the centre of the Site.
- (c) Two neighbourhood reserves in the east and north of the Site.

The locations and areas of existing esplanade reserves, esplanade strips, and access strips (clause 8(1)(d), Schedule 5)

19.5 There are no existing esplanade reserves, strips or access strips on the Site.

The locations and areas of any part of the bed of a river or lake to be vested in a territorial authority under section 237A of the Resource Management Act 1991 (clause 8(1)(e), Schedule 5)

19.6 There are no rivers or lakes currently within the Site and no rivers or lakes will be created as part of the Project.

The locations and areas of any land within the coastal marine area that is to become part of the common marine and coastal area under section 237A of the Resource Management Act 1991 (clause 8(1)(f), Schedule 5)

- 19.7 No part of the Site is currently within the coastal marine area and the Project does not propose to make any part of the Site part of the common marine coastal area.

The locations and areas of land to be set aside as new roads (clause 8(1)(g), Schedule 5)

- 19.8 The locations and areas of land to be set aside as new roads are shown in the subdivision plans included as Attachment 1. Cross-sections of those roads are included as part of the engineering plans (Attachment 5).

20 Information required in an application that includes a standard freshwater fisheries activity (clause 9, Schedule 5)

A description of the type of structure or fish facility (clause 9(a)(i), Schedule 5)

- 20.1 As identified in paragraph 4.9 above, there are two existing water races within the Site (shown on Figure 2 as Waterway 1 and Waterway 2).

- 20.2 As part of the Project:

- (a) A total of eight road culvert installations will be required along the length of Waterway 1 and approximately six driveway culverts.
- (b) Two road culverts may be required across Waterway 2.

The dimensions and design of the structure or fish facility (clause 9(a)(ii) - (iii), Schedule 5)

- 20.3 AEL has recommended the following design parameters for the new culverts:¹⁸⁷

- (a) The culvert inverts should be buried at least a short distance under the waterway bed, with continuous natural substrate through each culvert. Specifically, the new culverts should be embedded into substrate gravels to facilitate fish passage.
- (b) The diameter of each culvert should be, at minimum, the same as the width of the adjacent open channel wetted width.
- (c) The slope of each culvert should also be similar to that of the surrounding open channel.
- (d) The measure of each culvert should ensure that the water velocity will approximately match that of the existing open channel.

- 20.4 These recommendations have been accepted by HDL and are referenced in condition 48 of the Proposed SDC Conditions. Plans showing the indicative dimensions and design of the new culverts are included as Attachment 5.

The placement of the structure or fish facility (clause 9(a)(iv), Schedule 5)

- 20.5 The location of the new culverts are shown on the Figure 4 in the Aquatic Ecology Assessment.

¹⁸⁷ Attachment 11, Aquatic Ecology Assessment at page 9.

The water flows (clause 9(a)(v), Schedule 5)

- 20.6 As outlined in the Aquatic Ecology Assessment, observed flows through the existing culverts on the Site were low - well below the rule-of-thumb 0.3 m/s velocity associated with sustainable, aerobic swimming speeds. The flow levels are regarded as easily passable for the small resident upland bullies.
- 20.7 To ensure passage for resident upland bullies, the water velocity within each new culvert will not exceed 0.3 m/s.

The operating regime (clause 9(a)(vi), Schedule 5)

- 20.8 The Waterways within the Site are irrigation raceways which form part of the Malvern irrigation network that is managed by SDC. The water within the network is sourced from surface water intakes on the Kowhai River.
- 20.9 Further detail regarding the extent of the Waterways within the Site is included in AEL's Aquatic Ecology Assessment.

The freshwater species and values present (with a particular focus on threatened, data-deficient, and at-risk species as defined in the New Zealand Threat Classification System (clause 9(b), Schedule 5)

- 20.10 The only freshwater species in the water races identified by AEL was the upland bully *Gobiomorphus breviceps*.
- 20.11 The upland bully is native to New Zealand and has a conservation status of "At Risk – Naturally Uncommon" (Dunn *et al.* 2025), but is frequently observed in the surrounding area and wider Canterbury region.¹⁸⁸ The upland bully is non-migratory and can therefore form inland populations in waterways with compromised upstream or downstream fish passage. The upland bullies discovered by AEL in Waterway 1 were small, ranging from 32-44 mm in length, suggesting interrupted population recruitment. The upland bullies found in Waterway 2 were larger (ranging from 46-82mm).

The water quality and quantity in the surrounding habitat (at the proposed structure location, upstream and downstream) (clause 9(c), Schedule 5)

- 20.12 Based on the surveys undertaken by AEL, the ecological values of both Waterways were assessed as low.¹⁸⁹
- 20.13 In relation to Waterway 1:¹⁹⁰
- (a) The overall Macroinvertebrate Community Index (*MCI*) score was 47.3, which is indicative of "poor" stream health (*MCI* < 80). This was consistent with the available habitat for macroinvertebrates in the Waterway. The sampled reach was slow flowing, with emergent macrophytes and a thick layer of duckweed. Substrate consisted of soft sediment.
 - (b) The Rapid Habitat Assessment scores indicated poor-quality habitat for aquatic biota. The low scores were caused by a lack of fencing, with consequent stock-accelerated

¹⁸⁸ Attachment 11, Aquatic Ecology Assessment, page 5.

¹⁸⁹ Attachment 11, Aquatic Ecology Assessment, pages 5 - 6.

¹⁹⁰ Attachment 11, Aquatic Ecology Assessment, page 5.

erosion, possible pollution, and sedimentation. There was also limited shade over the Waterway.

20.14 In relation to Waterway 2:¹⁹¹

- (a) The overall MCI score was 71.6, which is also indicative of “poor” stream health (MCI < 80). It is likely that some high-health invertebrates, such as *Zelandobius*, were carried downstream to this location from one or several irrigation intakes during high flow events.
- (b) The Rapid Habitat Assessment scores also indicated poor-quality habitat for aquatic fauna. This low score was due to sedimentation in the Waterway, along with active bank erosion and an overall lack of waterway shading. This is also attributed to lack of fencing to prevent stock access and stock accelerated erosion.

How the fish passage will be provided for or impeded (clause 9(d), Schedule 5)

20.15 Construction of the new culverts will require the temporary diversion of the existing water races and the translocation of fish within those water races by a suitably qualified ecologist in accordance with a Fish Management Plan (Proposed ECan Conditions (Construction Phase Stormwater), conditions 20 – 22).

20.16 All new culverts will be designed and constructed in accordance AEL’s recommendations (set out in paragraph 20.3 above) to maintain the same level of fish passage as the adjacent open channel water race.

20.17 Follow-up surveys of macroinvertebrate biodiversity and fish abundance will be conducted upon completion of the proposed waterway enhancements to monitor the impacts of the Project on the ecology of the Waterways (Proposed ECan Conditions (Construction Phase Stormwater), conditions 20 and 21(g)).

21 Information required for an application for wildlife approvals

The purpose of the proposed activity (clause 2(1)(a), Schedule 7)

21.1 The purpose of the Project is to establish a new residential neighbourhood in Darfield that integrates with the existing character of the surrounding environment and delivers high quality amenity, both in terms of urban form and layout and with respect to the existing natural features of the Site.

The actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land) (clause 2(1)(b), Schedule 7)

21.2 Surveys undertaken by EME have identified Canterbury grass skinks, *Oligosoma aff polychrome Clade 4* in low abundance in high-quality habitat along the existing road reserves and in low abundance in an area of low-quality habitat within the Site. In addition, EME has identified that the presence of the following skinks is possible within the Site:

- (a) Southern grass skink / mokomoko (*Oligosoma chionocholes* aff. *polychroma* Clade 5).
- (b) McCann's skink (*Oligosoma maccanni*).

¹⁹¹ Attachment 11, Aquatic Ecology Assessment, page 5.

- 21.3 HDL proposes to capture and salvage any of these skinks identified within the Site and relocate any captured skink to the proposed dryland habitat that will be created within the Site or the dedicated lizard release area near the Selwyn River that has been approved by ECan. The capture and relocation of the skinks will be managed in accordance with the Lizard Management Plan (Attachment 22, Proposed Wildlife Approval Conditions, condition 1).
- 21.4 In addition to capture and relocation of the skinks, the following initiatives will be undertaken to enhance lizard habitat within the Site:
- (a) The road reserve habitat along West Coast Road / SH 73 will be replaced with a 3m earth bund, which will be planted to support suitable lizard habitat. With the establishment of a bund (which creates a larger surface area along this boundary), an increase in lizard habitat area compared to the current baseline will be created. HDL's ecologist expects that this area will be recolonised by skink from adjacent habitat following remediation.
 - (b) Planting within the riparian margins of the Waterways will enhance existing habitat and/or create new lizard habitat.
 - (c) Agricultural practices will cease, including heavy glyphosate use and weed removal (i.e.: dense ivy) which will enhance lizard habitat and benefit remaining lizard populations.
- 21.5 Neither the Site nor the activities proposed for authorisation as part of the Wildlife Act 1953 approval involve public conservation land.

Other wildlife

- 21.6 Surveys undertaken by HDL's terrestrial ecologist have also identified the presence of other wildlife on the Site, being:
- (a) Southern bell frog (*Ranoidea raniformis*).
 - (b) Brown (whistling) tree frog (*Rawlinsonia ewingii*).
 - (c) Eastern falcon / karearea (*Falco novaeseelandiae novaeseelandiae*).
 - (d) New Zealand pipit / pihoihoi (*Anthus novaeseelandiae novaeseelandiae*).
 - (e) South Island pied oystercatcher / tōrea tuawhenua (*Haematopus finschi*).
 - (f) Black-billed gull / tarāpunga (*Larus bulleri*).
 - (g) Grey teal / tētē (*Anas gracilis*).
 - (h) Australasian shoveler / kuruwhengi (*Anas rhynchotis*).
 - (i) Grey duck × mallard hybrid (*Anas superciliosa* × *platyrhynchos*).
 - (j) Bellbird / korimako (*Anthornis melanura melanura*).
 - (k) Shining cuckoo / pīpīwharaua (*Chrysococcyx lucidus lucidus*).
 - (l) Australasian harrier / kāhu (*Circus approximans*).
 - (m) White-faced heron / matuku moana (*Egretta novaehollandiae*).

- (n) Grey warbler / riroriro (*Gerygone igata*).
- (o) Pied stilt / poaka (*Himantopus himantopus leucocephalus*).
- (p) Welcome swallow / warou (*Hirundo neoxena neoxena*).
- (q) Southern black-backed gull / karoro (*Larus dominicanus dominicanus*).

21.7 No Wildlife Act 1953 approvals in relation to the other wildlife is required. A Bird Management Plan will be implemented to ensure birds are not disturbed or killed during construction of the Project.

Assessment of the activity and its impacts against the purpose of the Wildlife Act 1953 (clause 2(1)(c), Schedule 7)

21.8 The Wildlife Act 1953 does not have an explicit purpose statement, but its function is to protect and control any “animal that is living in a wild state” (including mammals, birds, and reptiles), including by requiring approvals for activities which may affect those animals.

21.9 The capture, salvage, transfer and incidental killing of wildlife without an approval is an offence under sections 63(1) and 65(1) of the Wildlife Act 1953. Under sections 53 and 53A of the Wildlife Act 1953, approval may be given authorising the capture, salvage, transfer and incidental killing of wildlife. The approval may be subject to conditions which, among other matters:

- (a) prescribe the means by which any such wildlife may be caught, salvaged and transferred;
- (b) prescribe the areas in which any such wildlife may be caught, salvaged and transferred;
- (c) prescribe the duration of the authority; and/or
- (d) provide for the planting of any plants or of any specified kind of plants in or adjacent to any such cage, run, or other enclosure.

21.10 The Project will require the removal and disturbance of existing vegetation on the Site which provides low-quality habitat for Canterbury grass skinks (being protected wildlife under the Wildlife Act 1953).

21.11 To ensure that skinks on the Site which may be affected by those works are protected, HDL is proposing to capture and relocate those skinks to dedicated release sites.

21.12 Subject to implementation of the Lizard Management Plan, the overall adverse effects of the Project on lizards have been assessed by EME as very low. The proposed enhancement of habitats within the Site (along with the cessation of agricultural activities) will generate a net gain outcome for skinks within the Site and the surrounding area.

21.13 In light of those conclusions, the Project will achieve the purpose of the Wildlife Act 1953, being the protection of wildlife.

A list of protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted (clause 2(1)(d), Schedule 7)

21.14 In addition to the Canterbury grass skinks *Oligosoma aff polychroma* Clade 4, the following wildlife species are known or predicted to be in the area:

- (a) Southern grass skink / mokomoko (*Oligosoma chionochloescens* aff. *polychroma* Clade 5).
- (b) McCann's skink (*Oligosoma maccanni*).

21.15 Taking a conservative precautionary approach, EME confirms that a total of 90 to 150 skinks may be impacted on the Site.

Impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System) (clause 2(1)(e), Schedule 7)

21.16 The Canterbury grass skink *Oligosoma aff polychrome* Clade 4 and the southern grass skink / mokomoko *Oligosoma chionochloescens* aff. *polychroma* Clade 5 have a rating of "At Risk – Declining" under the New Zealand Threat Classification System.

21.17 The impacts of the Project on these skinks have been assessed by EME and include:

- (a) The loss of 1.7 ha of herpetofauna habitat through earthworks and the removal of vegetation.
- (b) Incidental disturbance, injury and/or mortality to herpetofauna during vegetation removal and construction activities.
- (c) Post-construction/operative disturbances which may result in the stress, injury or mortality of indigenous wildlife.

The methods proposed to be used to conduct the actions to ensure that best practice standards are met (clause 2(1)(f), Schedule 7)

21.18 The capture and relocation of the skinks identified on the Site will be managed in accordance with the Lizard Management Plan.

21.19 Best practice standards for managing New Zealand lizards are published in the Department of Conservation Lizard Technical Advisory Group document, *Guidelines for producing management plans for New Zealand lizards*. The Lizard Management Plan follows the preferred methodologies and standards set out in that document.

21.20 The detailed methods for capturing and relocating the grass skinks is set out in section 2 of the Lizard Management Plan. In summary:

- (a) As the Project is proposed to be staged, lizard salvage and transfer shall be staged and implemented in the summer season immediately prior when the identified habitats will be affected by the works.
- (b) The method for lizard salvage trapping will be determined by the herpetologist and may include artificial cover objects (ACO), Gee's minnow funnel traps (GMT) or pitfall traps (PFT).

- (i) GMTs and PFTs should be used throughout the peak lizard management period, or if ACOs are used, they must be checked early morning before skinks vacate hot ACOs.
 - (ii) ACOs must be installed at least two months prior to October, or one month prior to any month from November to April.
 - (iii) GMT and PFT use must follow industry best practice, be baited with canned pear or other suitable lizard bait, stuffed with appropriate material and covered to reduce the risk of heat stress and if required, a wet sponge added to the trap.
- (c) Traps must be checked at least once per day. A percentage trap-catch following three nights of valid trapping shall dictate further management requirements. After three nights:
- (i) If no lizards are caught in a defined area, no further lizard management is required.
 - (ii) If 1-10% trap catch occurs, supervised habitat clearance shall be implemented.
 - (iii) If 11-30% trap catch occurs, two more nights of trapping, followed by the implementation of supervised habitat clearance.
 - (iv) If >30% trap catch occurs, five more nights of trapping, followed by the implementation of supervised habitat clearance.¹⁹²

21.21 The design of the enhancement works set out in the landscape plans included in the Landscape Framework Report has been informed by HDL's terrestrial ecologist and will improve the quantity and quality of the habitat on the Site.

The methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes (clause 2(1)(g), Schedule 7)

21.22 Refer paragraph 21.20 and section 2 of the Lizard Management Plan.

State the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available) (clause 2(1)(h), Schedule 7)

21.23 The capturing, salvaging and relocation of lizards will be carried out within areas of the Site (being 160 Bangor Road, Darfield) with identified lizard habitat, described in section 1.4.1 of the Lizard Management Plan. In addition to these areas, manual surveys will be undertaken during the setting of traps to identify the presence of any other lizard habitats. If identified, capturing and relocation of lizards within those areas will also be conducted.

State whether authorisation is sought to temporarily hold or relocate wildlife (clause 2(1)(i), Schedule 7)

21.24 The approval is sought to capture and relocate Canterbury grass skink, southern grass skink and McCann's skink during the construction of the Project.

¹⁹² To illustrate, if 100 traps are deployed in a defined area of habitat, three nights will result in 300 trap nights. If no lizards are caught in 300 trap nights, bullet-point 1 occurs. If 1-15 lizards are caught, 2 occurs. If 16-75 lizards are caught, 3 occurs and if >75 lizards are caught 4 occurs.

All actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site (clause 2(1)(j), Schedule 7)

21.25 Refer paragraphs 18.44 – 18.46.

Where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife) (clause 2(1)(k), Schedule 7)

21.26 HDL's terrestrial ecologist concludes that, subject to implementation of the Lizard Management Plan and the measures to support other wildlife on Site, all adverse effects on wildlife will be appropriately avoided, remedied or mitigated such that no offsetting or compensation will be required. The methods to be used to avoid and minimise adverse effects on wildlife are described in 18.44 – 18.46 and in the Lizard Management Plan.

Whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act 1953 (clause 2(1)(l), Schedule 7)

21.27 Neither the Applicant, nor anyone involved in the substantive application for the Project has been convicted of any offence under the Wildlife Act 1953.

Whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act 1953 pending before a court (clause 2(1)(m), Schedule 7)

21.28 Neither the Applicant, nor anyone involved in the substantive application for the Project has current criminal charges under the Wildlife Act 1953 pending before a court.

Provide proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts (clause 2(1)(n), Schedule 7)

21.29 Details of all consultation undertaken with the Department of Conservation and the Rūnanga Representatives are included as Attachment 16.

Provide any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal (clause 2(1)(o), Schedule 7)

21.30 HDL commissioned Mark Hansen from EME to undertake surveys of the wildlife on the Site, and to carry out an assessment of the impacts of the Project on the wildlife (Attachment 12). Mark's qualifications and experience are set out in the TEcIA. Mark has also prepared the Lizard Management Plan and has led consultation with the Department of Conservation in relation to the wildlife approval.

22 List of attachments

Assessment	Author
FTAA requirements	
Referral notice	-
ECan section 30 notice	-
Technical assessments	
Urban Design Assessment	Urban Acumen
Landscape Framework Report	Kamo Marsh
Infrastructure Assessment	Davie Lovell Smith (<i>DLS</i>)
Integrated Transport Assessment	Novo Group
Geotechnical Assessment	ENGEO
Contamination Assessment	ENGEO
Aquatic Ecology Assessment	Aquatic Ecology Limited
Terrestrial Ecological Impact Assessment	Effects Management Ecology Limited
Economic Assessment Update	Savvy Consulting
Acoustic Assessment	Marshall Day Acoustics
Plans	
Subdivision plans	DLS
Engineering plans	DLS
Draft conditions	
SDC draft conditions	DLS / Blue Ridge
ECan draft conditions	DLS / Blue Ridge
Draft management plans	
Erosion and sediment control plan (including dust management plan)	DLS
Stormwater Management Plan	DLS

Lizard Management Plan	Effects Management Ecology Limited
RMA documents assessments	
Permitted activity table	DLS / Blue Ridge
RMA documents objectives and policies assessment	DLS / Blue Ridge
RMA documents compliance assessment	DLS / Blue Ridge
Engagement	
Adjoining owners and occupiers + letter	Greenwood Roche / HDL
Rūnanga Representatives Engagement (including NT SDG assessment)	DLS / Blue Ridge
Engagement register	DLS / Blue Ridge