Fast-track

Te Kāwanatanga o Aotearoa
New Zealand Government

Memorandum on Completeness and Scope

File	FTAA-2606-1253
Application	Ōhoka Residential Subdivision
To	Daya Thomson, Team Lead LOA
From	[redacted]
Date	23 July 2026
Subject	Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

Purpose

1. The purpose of this memo is to assist you in making your decision on whether the Ōhoka Residential Subdivision application, lodged by Carter Group Limited (the Applicant), received by the Fast-track Team on 1 July 2026 complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 31 March 2026.

Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

The application

4. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.
5. The Application is a listed project.
6. The Application was lodged on 1 July 2026. The EPA must, in consultation with the relevant administering agencies and relevant consent authorities, decide whether this substantive

application complies with section 46 of the Act within 15 working days of the lodgement of the application (but may be longer where the EPA has requested further information from the applicant under section 46(2B)). This application was not subject to a further information request, therefore the date by which the EPA must make a decision under s 46 is **23 July 2026.**

7. As set out in more detail below, the EPA must decide whether the application is complete and either:
   - Notify the Panel Convener they can set up an expert consenting panel to make a decision on the application (if complete and within scope); or
   - return it to the person who lodged it (if incomplete and/or not within scope).

Project and Scope

8. The project is described in Schedule 2 of the Act as:

   Subdivide land and develop approximately 850 residential dwellings, a commercial or mixed-use centre, and a polo field, and enable the potential development of a school or retirement village (or both)

9. The approximate geographical location is identified in Schedule 2 of the Act as:

   152 hectares at 511, 531, 535, and 547 Mill Road and 290 and 344 Bradleys Road, Ohoka, Waimakariri

10. The application is for the following activities described in the executive summary of the AEE:

    "A subdivision and development of approximately 154 hectares of rural zoned land adjoining the Ōhoka settlement in the Waimakariri District. The proposal provides for:

    - 879 residential allotments of varying sizes,

    - a local centre providing day-to-day goods and services,

    - a retirement village of up to 250 units,

    - a polo ground and associated facilities, and

    - a comprehensive network of roads, reserves, waterways, and three-waters infrastructure.

    The project represents a master-planned expansion of the existing Ōhoka settlement, delivering a walkable village structure, local amenities, and extensive open space and waterway enhancement."

11. The application is for the geographical location of *531 and 535 Mill Road and 325 and 347 Whites Road, and 236 Bradleys Road, Ōhoka.*

12. The application relates solely to the listed project because:

    a. the project description is to subdivide and develop land as listed;

    b. the listing states it is for 152 hectares, however the application is for approximately 154 hectares. This difference has been explained by the applicant in their covering letter as due to 531 Mill Road not being included in the indicative master plan at the time of listing. As this property was included in the description of the location and the location is described as 'approximate' in the Act I am satisfied this is consistent with the listed project.

c. The listing states the geographical location is: *511,* 531, 535*, and 547 Mill Road and 290 and 344 Bradleys Road.* Conversely, the application is for 531, 535 Mill Road and 325, 347 Whites Road, and 236 Bradleys Road. However, the site plans included in both the listed and lodged application remains the same (apart from the addition of the 2 hectares described above). The parcels of land in both the listed and lodged application also appear in the same area. As the geographical location is 'approximate' and the site plan has not moved from being between Bradleys, Mill and Whites Roads I believe the lodged application is consistent with the listing in Schedule 2 of the Act.

d. the listing states it will include approximately 850 residential dwellings, but the application includes 879 allotments. The word 'approximately' does allow some flexibility in terms of the total number of dwellings proposed. I have considered what could be viewed as within the realm of 'approximately 850' in the context of this specific project, and in my view a proposal for 879 dwellings is near (and within) the limit of 'approximately 850'.

e. the listing states a commercial or mixed-use centre. The application includes this as *a local centre providing day-to-day goods and services;*

f. the listing includes a polo field as does the application;

g. the listing includes the development of a school or retirement village (or both), the application is for *a retirement village of up to 250 units*.

13. The application also includes *a comprehensive network of roads, reserves, waterways, and three-waters infrastructure.* These features are subsidiary to the listed project and are expected to be applied for with an application of this size and scale. They are also tied to the subdivision and development of land that is stated in the listed project. As section 4 of the Act stipulates, a project includes: 'any activity that is involved in, or that supports and is subsidiary to, a [listed] project.' I believe the project described above fits this description.

14. Based on the above, I believe the application **relates solely** to the listed project in Schedule 2 of the Act.

Fast-track consenting application process

Legislative context

15. The EPA must decide, in consultation with relevant administering agencies and consent authorities, whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
    - complies with sections 42, 43 and 44;
    - relates solely to a listed project or a referred project;
    - the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
    - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.

16. The EPA may request further information from the applicant under section 46(2A) for the purposes of determining whether the application is complete and within scope.

Section 42 Requirements

17. Section 42 of the Act states that an authorised person may lodge a substantive application for the project, 1 substantive applications for each stage of a project if the Minister has determined that the project may proceed in stages (either under s 21(1)(a) or s 37A). Section 42(4) lists the approvals that may be sought under the Act.
18. This application has been lodged by Carter Group Limited. This person is an authorised person under the Act because they are the authorised person identified for the listed project under s42(1).
19. The approvals being sought are:
    - an approval described in section 42(4)(a) (resource consent), **checklist A:**
        - including subdivision or reclamation: **checklist A1**;
        - including standard freshwater fisheries activity: **checklist A2**;
    - an approval described in section 42(4)(h) (wildlife approval), **checklist E**;
    - an approval described in section 42(4)(i) (archaeological authority), **checklist F**;
20. All of the above listed approvals are of the type set out in section 42(4) of the Act
21. For each of the approvals sought, the applicant is eligible to apply for any corresponding approval under a specified Act.

Section 43 Requirements

22. Section 43 of the Act sets out the requirements for a substantive application. The substantive application was lodged in the form and manner approved by the EPA. Assessment of section 43 requirements is included at Appendix 1.

Section 44 Requirements

23. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at Appendix 1.
24. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in Appendix 2.
25. As set out in more detail in Appendix 2, most agencies consulted have advised that the information required by section 44 is provided in **sufficient** detail to satisfy the purpose for which it is required.

26. Waimakariri District Council (WDC) advised the information required by section 44 is provided in **insufficient** detail to satisfy the purpose for which it is required. However, the key issues identified by WDC were not matters that would impact the completeness decision and rather were matters to raise with a Panel once appointed. The full response from WDC can be found in Appendix 2.
27. Therefore, the decision is that the information required by section 44 was provided in **sufficient** detail to satisfy the purpose for which it is required.

Ineligibility

28. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
29. The list of ineligible projects includes activities:
    - on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
    - on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
    - in a customary marine or protected customary rights area without written agreement from the rights holder/group;
    - within an aquaculture settlement area without the required authorisation;
    - activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
    - that require permissions on national reserves (or reserves vest in another person) held under the Reserves Act 1977 ; or
    - on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).
    - That are prohibited under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012, or section 15B or 15C the Resource Management Act 1991.
    - That relate to decommissioning under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012
    - That are undertaken for the purposes of an offshore renewable energy project.
30. I consider that, on the face of the application, the project does not appear to involve an ineligible activity.

Notification by applicant

31. Pre-lodgement requirements for a listed project require the applicant to notify in writing the persons and groups referred to in section 29(1)(aa). The persons and groups notified have 20 working days to respond from the date of the notice. The applicant must not lodge their substantive application until each 20-working day period has elapsed.
32. Consultation for this application began prior to the amendments being in force, in early 2025. Consultation records are included in Appendices 4-8 of the application and were confirmed with administering agencies and councils during EPA's consultation under section 46.
33. As consultation was undertaken prior to the commencement dates listed in the Amendment Act, and records of that consultation have been confirmed as sufficient by each party, notification was not required under Section 29(1)(aa).

Fees and levies

34. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:
    - Application fee in the sum of $250,000 plus GST;
    - Levy in the sum of $140,000 plus GST.

Consultation

35. I have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:
    - Canterbury Regional Council and Waimakariri District Council for:
        i. an approval described in section 42(4)(a) (resource consent)
    - The Department of Conservation for:
        i. an approval described in section 42(4)(h) (Wildlife Act wildlife approval)
    - Heritage New Zealand Pouhere Taonga for an approval described in section 42(4)(i) (archaeological authority).
36. A summary of the consultation is included as Appendix 2.

Assessment of compliance for each section of each application form

37. I have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in Appendix 1 for ease of reference.
38. My view is that the application does comply with section 46 and the EPA may now notify the applicant of its decision.

39. The EPA must now decide whether the substantive application has a competing application under section 47A(1) (under delegation from the Minister for Infrastructure under section 47C) within 10 working days from the date of the completeness decision.
40. Once the EPA has made the decision under section 47A(1), the EPA must notify the panel convener that an expert consenting panel can be set up to commence consideration and decision of the application.

Appendix 1: Assessment of section 44 sufficiency

My assessment of the application materials is set out in the relevant checklists below:

CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference	EPA
5(1)(a)	A description of the proposed activity	**AEE, Introduction, pages 1-4**	Yes, as described. Also present succinctly at page one of the covering letter.
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to— (i) a statutory area (as defined in the relevant Treaty settlement Act); or (ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or (iii) a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011	**AEE, the Site and the Surrounding Environment, pages 10-15 Appendix 26, Scheme Plans**	Yes, as described - (i) to (iii) are answered in full within the covering letter (pg10).
5(1)(c)	Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being: • section 42; and	**Cover letter to the Application, Attachment 1**	Yes, as described.

	• sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid.		
5(1)(d) and 5(6)	The full name and address of— (i) each owner of the site and of land adjacent to the site; and (ii) each occupier of the site and of land adjacent to the site whom the applicant is able to identify after reasonable inquiry; If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect (clause 5(6)).	**Appendix 10, Adjacent Land Documents, pages 8- 9**	Yes, as described. Full Appendix 10 for map of locations, pages 8-9 for list.
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	**N/A**	N/A
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	**N/A**	N/A

5(1)(g)	An assessment of the activity against sections 5, 6 and 7of the Resource Management Act 1991	**AEE, RMA Part 2 and Sections 106 and 106A, pages 148-150**	Yes, as described.
5(1)(h) (and also clauses 5(2) and 5(3))	An assessment of the activity against any relevant provisions in any of the following documents: • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement: • a regional policy statement or proposed regional policy statement: • a plan or proposed plan: • a planning document recognised by a relevant iwi authority and lodged with a local authority. This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being: • any relevant objectives, policies or rules in the documents listed; and	**AEE, Relevant Provisions of Planning Instruments, pages 135-1346 Appendix 33 National Planning Instruments Compliance Assessment Appendix 34 Waimakariri District Plan Compliance Assessment Appendix 35 Partially**	Yes, as described. CRC confirm that the application assesses relevant rules, policies and objectives from the relevant documents identified.

	• any requirement, condition, or permission in any rules in any of those documents; and • any other requirements in any of those documents.	**Operative District Plan Compliance Assessment Appendix 36 Canterbury Land and Water Regional Plan Compliance Assessment Appendix 42 Provisions Assessment**	
5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including— (i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area	**N/A**	N/A CRC agrees that there are no applicable Treaty Settlements that apply to the project area.

5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;	**N/A**	N/A
5(1)(k)	Any conditions that the applicant proposes for the resource consent.	**Appendix 43 , 44, 45 and 46**	Yes, as described.
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— (i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and (ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.	**Appendix 9, Confirmation of existing consents**	Yes, as described. There are multiple letters in Appendix 9, the most recent update is dated 14 April 2026 which is within the 3-month timeframe. CRC has confirmed this in their section 46 consultation response.

5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6.	**AEE**	Yes, as described – especially pages 78-134 of the AEE.
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7.	**AEE**	As above.
6	(1) The assessment of an activity's effects on the environment must include the following information: (a) an assessment of the actual or potential effects on the environment:	**(a) AEE, Assessment of Environmental Effects, pages 78-134**	Yes, as described. Additionally, d) included in Appendixes 43-44. Regarding e) all persons have been identified as described. Adjacent

	(b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use: (c) if the activity includes the discharge of any contaminant, a description of— (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and (ii) any possible alternative methods of discharge, including discharge into any other receiving environment: (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity: (e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal: (f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision: (g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how	**(b) N/A** **(c) AEE Assessment of Environmental Effects, Water Quality and Contaminants, pages 105-131 (and associated appendices)** **(d) AEE, Relevant Other Matters, Mitigation and Monitoring Measures, page 147** **(e) Appendix 3, 4, 5, 6, 7, and 8; See also, cover letter to the application, Consultation / Notification**	landowners have not been consulted but have been identified within appendix 10. All other points are present in application as described.

	the effects will be monitored and by whom, if the activity is approved: (h) an assessment of any effects of the activity on the exercise of a protected customary right.	**Requirements, pages 6-7** **(f) Appendix 6, relevant iwi authorities, hapū, and Treaty settlement entities; See also cover letter to the application, Consultation / Notification Requirements, pages 6-7** **(g) AEE, Relevant Other Matters, Mitigation Measures and Monitoring, page 147 and associated**	

		appendices **(h) N/A**	
7	The assessment of an activity's effects on the environment must cover the following matters: (a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: (b) any physical effect on the locality, including landscape and visual effects: (c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity: (d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations: (e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: (f) any unreasonable emission of noise: (g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.	**(a) AEE , Introduction, Project Benefits and related appendices, including Appendix 2, Economics Report.** **(b) AEE, Assessment of Environmental Effects, Character and Amenity, pages 100-102 and Appendix 23 (Landscape Assessment)** **(c) AEE,**	Present, as described. WDC has stated that there is: "insufficient information present to substantiate the claimed economic benefits and associated costs" This is not a matter that is directly assessed through completeness of this clause. The presence of the information (and the fact it is present in enough detail for an assessment to be made against it) means it is present in sufficient detail to satisfy this clause. I believe the matters raised by WDC are more appropriate to be raised with an Expert Panel once appointed.

		Assessment of Environmental Effects, Aquatic Ecology, pages 110-115; See also AEE, Assessment of Environmental Effects, Terrestrial Wildlife pages 118-119 **(d) AEE, Assessment of Environmental Effects, sites of significance to Iwi and Cultural Considerations, pages 120-123** **(e) AEE Assessment of Environmental**	

		Effects, Water Quality and Contaminants, pages 104- 131 (and associated appendices) **(f) N/A** **(g) AEE, Assessment of Environmental Effects, Natural Hazards, page 103**	
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991)	**Appendix 33 National Planning Instruments Compliance Assessment** **Appendix 34 Waimakariri District Plan Compliance**	Yes, present as described. Some permitted activities with WDC have been described as "infringes" within the application. Explanation as to the infringement is included throughout Appendix 34. The AEE describes an overview of the compliance with activities (see pages 57-70, specifically paragraphs 278, 281, and 283). This states that the project has a

		Assessment **Appendix 35 Partially Operative District Plan Compliance Assessment** **Appendix 36 Canterbury Land and Water Regional Plan Compliance Assessment** **Appendix 42 Provision Assessment**	non-complying activity status under all plans analysed and included on page 70 is a statement that some activities applied for would be prohibited under the RMA but are eligible for approval under section 42(5) of the FTAA. This level of detail is sufficient for completeness.
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document	**N/A**	N/A

5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaitai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	**N/A**	N/A

CHECKLIST A1 – Subdivision or reclamation resource consent

Clause, Schedule 5	Information required for an application for a subdivision consent or a reclamation consent (in addition to the information required in Checklist A)	Application Reference	EPA
If this application is for a subdivision consent, please adequately define the matters set out in clause 8(1) below. If no subdivision consent is sought, please enter n/a.			
8(1)(a)	The position of all new boundaries	**Appendix 26, Scheme Plans**	Yes, as described.
8(1)(b)	The areas of all new allotments, unless the subdivision involves a cross lease or company lease or unit plan	**Appendix 26, Scheme Plans**	Yes, as described.
8(1)(c)	The locations and areas of new reserves to be created, including any esplanade reserves and esplanade strips	**Appendix 26, Scheme Plans**	Yes, as described.

8(1)(d)	The locations and areas of existing esplanade reserves, esplanade strips, and access strips	**N/A**	N/A
8(1)(e)	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	**N/A**	N/A
8(1)(f)	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	**N/A**	N/A
8(1)(g)	The locations and areas of land to be set aside as new roads	**Appendix 26, Scheme Plans**	Yes, as described.

If this application is for a reclamation consent, please include the information to show the area to be reclaimed set out in clause 8(2) below. If no reclamation consent is sought, please enter n/a.

8(2)(a)	The location of the area to be reclaimed	**Appendix 47, Watercourse and Wetland Changes Plan**	As described, also present in Appendix 26 and detailed in the AEE (page 46-49).
8(2)(b)	If practicable, the position of all new boundaries	**Appendix 26, Scheme Plans**	Yes, as described.

8(2)(c)	Any part of the reclaimed area to be set aside as an esplanade reserve or esplanade strip	**Appendix 26, Scheme Plans**	Yes, as described.

CHECKLIST A2 – Application including standard freshwater fisheries activity checklist

Clause, Schedule 5	Information required for a consent application that includes a standard freshwater fisheries activity	Application Reference	EPA
9(a)	in relation to the structure and any fish facility: (i) a description of the type of structure or fish facility: (ii) the dimensions of the structure or fish facility: (iii) the design of the structure or fish facility: (iv) the placement of the structure or fish facility: (v) the water flows: (vi) the operating regime	**AEE, Fisheries Act 1996, Table 11, pages 71-73**	Yes, as described. Also, Appendix 27 for design diagrams (iii).
9(b)	the freshwater species and values present (with particular focus on threatened, data-deficient, and at-risk species as defined in the New Zealand Threat Classification System)	**AEE, Fisheries Act 1996, Table 11, pages 71-73**	Yes, as described. Also present in Appendix 3 (Aquatic Ecology Limited Report) of Appendix 19(a) – Aquatic Ecology Assessment – Instream (page 64).

9(c)	the water quality and quantity in the surrounding habitat (at the proposed structure location, upstream and downstream)	**AEE, Fisheries Act 1996, Table 11, pages 71-73**	Present in sufficient detail at Appendix 19(a) at pages 6 to 10 and associated appendices within that document.
9(d)	how the passage of fish will be provided for or impeded	**AEE, Fisheries Act 1996, Table 11, pages 71-73**	Yes, as described. Also described in detail within Appendix 19(a).

CHECKLIST E – Wildlife approval

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Application Reference	EPA
2(1)(a)	Specify the purpose of the proposed activity	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Present in application, on page 7 of the AEE.
2(1)(b)	Identify 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)	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Yes, as described.

2(1)(c)	An assessment of the activity and its impacts against the purpose of the Wildlife Act	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Yes, as described.
2(1)(d)	List 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	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Yes, as described. In further detail at page 55 of Appendix 24.
2(1)(e)	An outline of impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System)	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Yes, as described. In further detail at page 12- 17 of Appendix 24.
2(1)(f)	A statement of how the methods proposed to be used to conduct the actions involving protected wildlife will ensure that best practice standards are met	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Present in application within Appendix 24 (pages 7 – 30).
2(1)(g)	A description of the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Present in application within Appendix 24 (pages 19-21).

2(1)(h)	A statement of the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available)	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Present in application – maps and descriptions throughout Appendix 24.
2(1)(i)	A statement of whether authorisation is sought to temporarily hold or relocate wildlife	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Yes, as described.
2(1)(j)	A list of 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	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Yes, as described. Also present in AEE – pages 118-119. WDC states: *"The lizard management plan provides survey information; however, there has been no value assessment of the faunal SNA and no assessment of impacts on habitat, including how much lizard habitat is being permanently removed, what compensation is required, and what the impact is on the lizard population."* I believe the information raised by WDC is present in the application

			(see Appendix 24, pages 19 and 37 for habitat removal; compensation is not overtly mentioned as impacts are to be avoided, minimised or remedied; see page 36 for impacts). This information is present in sufficient detail to satisfy this clause. Further DOC has also commented that further information could be sought regarding the extent of the habitat to be salvaged/lost. This was not deemed a completeness issue by DOC.
2(1)(k)	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)	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Present in application within Appendix 24 (pages 15 – 17).
2(1)(l)	A statement of 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	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Yes, as described.

2(1)(m)	A statement of 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 pending before a court	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Yes, as described.
2(1)(n)	Provision of proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Present in application at Appendix 5 and 6.
2(1)(o)	Provision of any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal	**Appendix 24, Habitat Assessment (Appendix A), Table 2, Pages 2-4**	Present in application throughout Appendix 24.

CHECKLIST F – Archaeological authority

Clause, Schedule 8	Information required for an approval described in section 43(3)(i) Archaeological Authority	Application Reference	EPA
2(1)(a)	a legal description of the land or, if one is not available, a description that is sufficient to identify the land to which the application relates	**Appendix 12, Archaeological assessment, page 10**	Yes, as described (Appendix 12(a)).

2(1)(b)	the name of the owner of the relevant land, if the applicant is not the owner of the land	**Appendix 12, Archaeological assessment, page 10**	Yes, as described (Appendix 12(a)).
2(1)(c)	proof of consent, if the owner of the relevant land has consented to the proposed activity	**N/A**	N/A – statement on page 152 of the AEE describes how authority will not be exercised until land is owned by the Applicant.
2(1)(d)	confirmation that the application complies with section 42, 43, and 44 of the Act	**Covering letter to the Application, page 2**	Yes, as described.
	confirmation that the application relates solely to a listed project or a referred project	**Covering letter to the Application, pages 9-15 and Attachment 1**	Yes, as described.
	any fee, charge, or levy payable under regulations in respect of the application is paid.	**Covering letter to the Application, page 2**	Yes, as described.
2(1)(e)	a description of each archaeological site to which the application relates and the location of each site	**Appendix 12, Archaeological Assessment, page 62**	Yes, as described (Appendix 12(a)).

2(1)(f)	a description of the activity for which the authority is sought	**AEE, Proposal, Archaeology, pages 51-52; AEE, Proposal, Earthworks, pages 39-40 (and related appendices); Appendix 12, Archaeological assessment, Appendix 1; Appendix 26 Scheme Plans**	Yes, as described.
2(1)(g)	a description of how the proposed activity will modify or destroy each archaeological site	**Appendix 12, Archaeological assessment, Assessment of effects and other considerations, pages 57-61**	Yes, as described.
2(1)(h)	except in the case of an approval described in section 44(b) of the HNZPT Act, an assessment of— (i) the archaeological, Māori, and other relevant values of the archaeological site in the detail that is appropriate to	**Appendix 12, Archaeological assessment, Assessment of**	Yes, as described.

	the scale and significance of the proposed activity and the proposed modification or destruction of the archaeological site; and (ii) the effect of the proposed activity on those values	**effects and other considerations, pages 57-61**	
2(1)(i)	a statement as to whether consultation with tangata whenua, the owner of the relevant land (if the applicant is not the owner), or any other person likely to be affected— (i) has taken place, with details of the consultation, including the names of the parties and the tenor of the views expressed; or (ii) has not taken place or been completed, with the reasons why consultation has not occurred or been completed (as applicable).	**AEE, Consultation, pages 4-9 and associated appendices (i.e. Appendix 3, 4, 5, 6, 7 and 8)** **Covering letter to the Application, Consultation / Notification Requirements, pages 7-8** **The authority sought would not be exercised until ownership of the land has transferred to the Applicant**	Yes, as described.

CHECKLIST J – Listed project information requirements

Section, Fast-track Approvals Act	Information required for a substantive application under section 43(2) and section 13(4)	Application Reference	EPA
13(4)(a)	a description of the project and the activities it involves	**AEE, Introduction, pages 1-3**	Yes, as described.
13(4)(c)	information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24)	**AEE, Fast-track Approval Act Requirements, page 9**	Yes, as described.
13(4)(d)	a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application	**Appendix 26, Scheme Plans**	Yes, as described.
13(4)(e)	the anticipated commencement and completion dates for construction activities (where relevant)	**Appendix 1, Authorised Person Statement, page 3**	A description of the stages and the anticipated timing is provided as described. The stages are described further in the AEE (pages 24 - 26).

			This level of detail is adequate for completeness.
13(4)(f)(i)	a statement of whether the project is planned to proceed in stages and, if so an outline of the nature and timing of the stages	**AEE, Proposal, Staging, pages 24-25**	As above.
13(4)(h)	a description of the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects	**AEE, Assessment of Environmental Effects, pages 78 - 134**	Yes, as described.
13(4)(i)	a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991	**AEE, Resource Management Act 1991, Prohibited Activities, page 53**	Yes, as described.
13(4)(j)	a list of the persons and groups the applicant considers are likely to be affected by the project, including— (i) relevant local authorities: (ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements: (iii) other relevant iwi authorities:	**AEE, Fast-track Approval Act Requirements, Pre-lodgement requirements, Consultation, pages 4-7** **See also, covering letter to the Application,**	Yes, as described.

	(iv) relevant Treaty settlement entities: (v) relevant protected customary rights groups and customary marine title groups: (vi) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou: (vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011: (viii) persons with a registered interest in land that may need to be acquired under the Public Works Act 1981:	**Consultation / Notification Requirements, pages 7-8 and Attachment 1**	
13(4)(k)	a summary of— (i) the consultation undertaken for the purposes of section 29 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and (ii) how the consultation has informed the project:	**AEE, Fast-track Approval Act Requirements, Pre-lodgment requirements , Consultation, pages 4-7;** **Covering letter to the Application Consultation / Notification**	Yes, as described. Also present in Appendices 3-8.

		Requirements, pages 7-8	
13(4)(ka)	a summary of how any responses provided to the notification under section 29(1)(aa) have informed the project	**AEE, Fast-track Approval Act Requirements, Prelodgment requirements , Consultation, pages 4-7**	Non-notified project due to consultation beginning prior to full Amendment Act being in force. Consultation responses and how they informed the project are present in application as described.
13(4)(l)	a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements	**N/A - refer to Attachment 1 of the Cover Letter to the Application**	Page 10 of the cover letter states there are no relevant Treaty settlements that apply to the project area. CRC agrees with the Applicant that “there are no Treaty settlements that apply to the Project area.” Post lodgement of the application, the applicant emailed the EPA stating that Ngāi Tahu Claims Settlement Act 1998 applies. We accept this information and confirm that this section has been answered in sufficient detail.

13(4)(m)	a description of any processes already undertaken under the Public Works Act 1981 in relation to the project	**N/A - refer to Attachment 1 of the Cover Letter to the Application**	N/A
13(4)(n)	a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019	**N/A - refer to Attachment 1 of the Cover Letter to the Application**	N/A
13(4)(o)	information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area	**N/A - refer to Attachment 1 of the Cover Letter to the Application**	N/A
13(4)(p)	a statement of whether the applicant is seeking a determination under section 23 and, if so, an assessment of the effects of the activity on the relevant land and on the rights and interests of Māori in that land	**N/A - refer to Attachment 1 of the Cover Letter to the Application**	N/A
13(4)(q)	a statement of whether the applicant is seeking a determination under section 24(2) and, if so, a description of— (i) the scale and adverse effects of the existing electricity infrastructure; and	**N/A - refer to Attachment 1 of the Cover Letter to the Application**	N/A

	(ii) how, if at all, that scale or those adverse effects are anticipated or known to change as a result of the maintenance, upgrading, or continued operation of the infrastructure		
13(4)(r)	a statement of whether the applicant is seeking a determination under section 24(4) and, if so,— (i) a description of every alternative site considered by the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) for the construction and operation of the new electricity lines (the activity); and (ii) for each alternative site considered,— (A) a statement of the anticipated and known financial cost of undertaking the activity; and (B) a description of the anticipated and known adverse effects of undertaking the activity; and (C) a description of the anticipated and known financial cost and practicality of available measures to avoid, remedy, mitigate, offset, or compensate for the anticipated and known adverse effects of the activity; and	**N/A - refer to Attachment 1 of the Cover Letter to the Application**	N/A

	(D) a description of any issues (including financial cost) that would make it impractical to undertake the activity on the site; and (E) an assessment of whether it would be reasonable and practical to undertake the activity on the site, taking into account the matters referred to in subparagraphs (A) to (D) and any other relevant matters		
13(4)(s)	a description of the applicant's legal interest (if any), or if the application is lodged by more than 1 person, the legal interest of any of those persons) (if any), in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work	**Appendix 1, Authorised Persons Statement, page 2**	Yes, as described.
13(4)(t)	an outline of the types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant	**N/A - refer to Attachment 1 of the Cover Letter to the Application**	N/A
13(4)(u)	whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,—	**N/A - refer to Attachment 1 of the Cover Letter to the Application**	N/A

	(i) if an application has been made, details of the application: (ii) if a decision has been made, the outcome of the decision and the reasons for it:		
13(4)(v)	a description of whether and how the project would be affected by climate change and natural hazards	**AEE, Assessment of Environmental Effects, Natural Hazards, pages 103-110 (and associated appendices)**	Yes, as described.
13(4)(w)	if the application is lodged by more than 1 person, a statement of the proposed approval to be held by each of those persons	**N/A**	N/A
13(4)(x)	a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the application is lodged by more than 1 person, any of those persons) under a specified Act	**Appendix 1, Authorised Persons Statement, page 2; There have been no compliance or enforcement actions taken against the Applicant**	Yes, as described.

13(4)(y)	Please provide the information specified below for the relevant approval(s) sought. This is the information specified in the relevant schedule.		
13(4)(y)(i), clause 2 of Schedule 5	**Resource consent or designation** (a) an assessment of the project against— (i) any relevant national policy statement; and (ii) any relevant national environmental standards; and (iii) if relevant, the New Zealand Coastal Policy Statement; and	**AEE, Relevant Provisions of Planning Instruments, pages 135-140; Appendix 42, Provisions Assessment**	Yes, as described. (ii) described in further detail at pages 54-56 of the AEE and Appendix 33. (iii) is determined not relevant by the applicant (see covering letter of the application, page 11).
	(b) in relation to any proposed approval that is a resource consent, whether, to the best of the applicant's knowledge, there are any existing resource consents of the kind referred to in section 30(3)(a).	**AEE, Fast-track Approval Act Requirements, Pre-lodgement Requirements, Existing Resource Consents, page 7 Appendix 9, Section 30 Notice**	Yes, as described. Entirety of Appendix 9 is relevant to this section.

13(4)(y)(ii), clause 3 of Schedule 5	**Change or cancellation of resource consent condition** The information to be provided under section 13(4)(y)(ii) is information about whether and how the change or cancellation of the condition is material to the implementation or delivery of the project.	**N/A**	N/A
13(4)(y)(iii), clause 4 of Schedule 5	**Certificate of compliance** The information required to be provided under section 13(4)(y)(iii) is information that shows the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent. Include information that shows that the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent.	**N/A**	N/A
13(4)(y)(iv), clause 2 of Schedule 6	**Concession** (1) The information in subclause (2) is required to be provided under section 13(4)(y)(iv) if a proposed concession includes a lease and— (a) the lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and (b) the granting of the lease would trigger a right of first refusal or a right of offer or return.	**N/A**	N/A

	(2) Confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return to waive that right for the purposes of the proposed lease.		
13(4)(y)(v), clause 23 of Schedule 6	**Land exchange** (1) The information required to be provided under section 13(4)(y)(v) is (a) - (e) below: (a) a description of both land areas proposed for exchange (for example, maps showing areas and location, addresses, and legal descriptions where possible:	**N/A**	N/A
	(b) the financial value of the land proposed to be acquired by the Crown:	**N/A**	N/A
	(c) a brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate: *Guidance note: This must include an explanation of why the exchange would benefit the conservation estate; and details of anything registered or noted for conservation purposes on the record of title for the land to be acquired by the Crown (clause 23(1A) of Schedule 6)*	**N/A**	N/A

	(d) if the land exchange would trigger a right of first refusal or a right of offer or return, confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return that the holder has agreed to waive that right for the purpose of the land exchange:	**N/A**	N/A
	(e) confirmation by the applicant that no part of any land to be exchanged by the Crown is – (i) land listed in Schedule 4; or (ii) a reserve declared to be a national reserve under section 13 of the Reserves Act 1977	**N/A**	N/A
13(4)(y)(vi), clause 4A of Schedule 5	**Standard freshwater fisheries activity approval** (4A) The information required to be provided under section 13(4)(y)(vi) is the following: (a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which the proposed structure may impede fish passage; and (b) whether any fish salvage activities are proposed.	**AEE, Fisheries Act 1996, pages 71-73 and associated Appendices (Appendix 19 (a) and 19 (b) Aquatic Ecology Assessment and Addendum)**	Yes, as described.

13(4)(y)(via), clause 2 of Schedule 9	**Complex freshwater fisheries activity approval** (2) The information required to be provided under section 13(4)(y)(via) is the following: (a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which this may impede fish passage; and (b) whether any other complex freshwater fisheries activities are proposed.	**N/A**	N/A
13(4)(y)(vii), clause 2 of Schedule 10	**Marine consent** (1) The information required to be provided under section 13(4)(y)(vii) is– (a) information about whether the Minister of Conservation is an affected person:	**N/A**	N/A
	(b) additional information about whether the applicant has already made an application for a consent under the EEZ Act in relation to the project, and, if so,— (i) details of any application made; and (ii) the decisions made on that application; and	**N/A**	N/A

	(iii) information about the matters that the Minister may consider under section 22(6):		
	(c) additional information (in a summary form) about compliance or enforcement action taken against the applicant by the EPA under the EEZ Act.	**N/A**	N/A
13(4)(y)(viii), clause 2 of Schedule 11	**Access arrangement** (1) Confirmation that the applicant has complied with section 29 (for the purposes of section 13(4)(y)(viii)).	**N/A**	N/A

13(4)(y)(ix), clause 15 of Schedule 11	**Mining permit** (1) For the purposes of section 13(4)(y)(ix), the information is— (a) a copy of the relevant exploration permit or existing privilege to be exchanged for a mining permit that entitles the holder to mine a Crown owned mineral: (b) the name and contact details of the proposed permit participants and the proposed permit operator: (c) a proposed work programme for the proposed permit, which may comprise committed work, committed or contingent work, or both: (d) evidence of the technical or financial capability of the proposed permit holder to comply with and give proper effect to the work programme: (e) information about the proposed permit holder's history of compliance with mining or similar permits and their conditions: (f) the proposed date on which the substantive application is intended to be lodged: (g) if the authorised person proposes to provide information under section 37, the date on which the person intends to provide that information:	**N/A**	N/A

	(h) the proposed duration of the permit: (i) if the proposed approvals include a mining permit for petroleum,— (i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource to which the development plan relates: (ii) the resources and reserves relating to the project, estimated in accordance with the Petroleum Resources Management System: (iii) a high-level overview of the following: (A) the proposed field development plan: (B) the proposed date for the commencement of petroleum production: (C) the economic model for the project: (D) the proposed duration of the proposed mining permit: (E) decommissioning plans:		

	(j) if the proposed approvals include a mining permit for minerals other than petroleum,— (i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates: (ii) for minerals other than gold or silver, a report or statement confirming the ownership of the minerals targeted: (iii) whether the application will be for a Tier 1 or Tier 2 permit: (iv) an estimate of the mineral resources and reserves relating to the project, including a summary on acquisition of the data and the data underpinning the estimate (such as information on sample locations, grade, and geology): (v) an indicative mine plan: (vi) a high-level overview of the following: (A) the proposed mining method:		

	(B) the proposed date for the commencement of mining and estimated annual production: (C) the economic model for the project: (D) the status of or anticipated timing for completing any prefeasibility or feasibility studies: (E) the proposed methods for processing mined material and handling and treating waste: (F) anticipated plans for mine closure and rehabilitation. (2) For the purpose of subclause (1)(j)(iv), for a Tier 1 permit application the resources and reserves relating to the project are to be estimated in accordance with a recognised reporting code such as JORC or NI 43-101.		
43(2)(b)	if the project is planned to proceed in stages,— (i) an outline of the nature and timing of the stages; and (ii) a statement of whether a separate substantive application is to be lodged for each of the stages; and	**AEE, Proposal, Staging, pages 24-26** **Covering letter to the Application, Attachment 1 - the**	Yes, as described.

	(iii) an explanation of how each stage meets the criteria in section 22:	**Application (ii)does not require separate substantive applications to be lodged for any of the stages; and (iii) accordingly, does not need to provide an explanation of how each stage meets the criteria in section 22.**	
43(2)(c)	the information that the applicant provided to the Minister when applying to have the project listed as a listed project and an explanation of how the substantive application is within the scope of the listed project.	**Covering letter to the Application, pages 3-4**	Information is partially present as described. The applicant has supplied a link to the hosted information that was lodged when they became a listed project and provided detail about how the substantive application is within scope of the listed project. Although a link to information does not represent strict compliance with the wording of this FTAA clause, we accept that this is an appropriate course of action here

			and accept that this section is complete on that basis.

Appendix 2: Consultation Summary

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

1. **Consultation with Canterbury Regional Council** as the relevant consent authority for the following approvals under the Resource Management Act 1991:
    - Resource consent (section 42(4)(a) of the Act)

CRC considers that the application meets the requirements of sections 42–43 of the Act. However, CRC considers that further discussion is required with the Applicant to work through the comments provided in its report.

9 July 2026

Emma Fahey
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Dear Emma Fahey,

Thank you for your letter dated 2 July 2026, regarding the Ōhoka Residential Subdivision from Carter Group Limited.

Please find below the response from the Canterbury Regional Council (CRC) regarding the completeness of the Applicant's substantive application under the Fast-track Approvals Act 2024 (FTAA).

SUMMARY AND KEY CONCERNS

CRC considers that the application is complete in accordance with Schedule 5 of the FTAA. Attachments 1 to 4 to this letter provide detailed assessment of the application supporting this conclusion.

The outstanding issues can likely be resolved through ongoing engagement with the Applicant in the coming weeks. We are already in contact with the Applicant and they have confirmed that they are willing to engage with CRC to work through the matters raised.

Despite the feedback provided by CRC on the application, this is not considered unexpected for a project of this scale and significance. It is anticipated that the outstanding matters can be addressed through the next stages of the Fast-track process by working collaboratively with the Applicant.

The following are areas CRC considers would be beneficial for the Applicant to address.

1. Information is required to assess Stormwater design and compliance issues with meeting the Waimakariri District Council Engineering Code of Practice 2025.
2. Quantification of changes in land and surface water recharge would ensure effects can be appropriately assessed.
3. Dewatering discharge options require further refinement.
4. Several gaps in the Water Quality Assessment and Aquatic Ecology Assessment that have not been addressed since CRC's initial pre application review of reports.
5. A Remedial Action Plan is required for contaminated land and the Site management Plan lacks detail.

6. Several issues will need to be worked through with the applicant’s experts regarding groundwater.
7. CRC’s economics expert does not agree with the Applicant’s economic assessment.
8. There are several policies and objectives of the Canterbury Regional Policy Statement (CRPS) that CRC’s expert has identified as not being met by this proposal.
9. Several amendments will be required to the conditions set out in the application.

Further detail on these matters is provided in Attachment 3, below.

We trust that this information assists you determining the completeness of the application under section 46(1) of the Act.

Please advise if you need any further clarification on any matters raised in this letter. We look forward to working with you further on this application if it is considered to meet section 46(1) of the Act.

Ngā mihi

Henry Winchester

Manager Consents Planning

LIST OF ATTACHMENTS

Attachment 1: Canterbury Regional Council comments under s46 FTAA

Attachment 2: CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Attachment 3: CRC Technical Advice Summary

Attachment 4: CRC Section 30 Response

Attachment 5: Updated CRC position regarding water take and competing resource interests

ATTACHMENT 1: CANTERBURY REGIONAL COUNCIL COMMENTS UNDER S46 FTAA - ŌHOKA RESIDENTIAL SUBDIVISION

Specific questions from the EPA

(Specific questions relating to this application in accordance with section 30 of the FTAA) Confirm that the written notice prepared by Council remains accurate at the time of receiving this letter.

CRC can confirm that the information contained in the written notice (14 April 2026) remains accurate as at the date of this letter. A copy of the written notice is provided as Attachment 4.

The substantive application includes applications for the following approvals under the Resource Management Act 1991 (RMA) that CRC is the relevant consent authority for: a resource consent that would otherwise be applied for under the RMA (section 42(4)(a) of the FTAA').

Based on the information provided in the substantive application (and its Appendices), CRC considers that the Canterbury Land and Water Regional Plan (LWRP) would apply.

Consents under the RMA that would be administered by CRC:

- Section 9 - Land use consent to undertake earthworks and excavation (including stockpiling) and vegetation clearance associated with earthworks, including works within specified setback areas of waterways and wetlands, and wetland/waterway reclamation earthworks where identified as part of the project.
- Section 15- Discharge permit to discharge sediment laden construction stormwater, dewatering water (to surface water and/or ground), temporary discharges associated with stream realignment/bypassing and in stream works, and residues from water treatment chemicals used for sediment control
- Section 13- Land use consent to reclaim and disturb the beds and banks of specified waterways and wetlands; remove existing structures and culverts; install culverts, bridges, abutments, and stormwater outfalls; and undertake related in stream works.
- Section 14- Water Permit to take and use water for dewatering, dust suppression and other construction-related water needs, and undertake non-consumptive takes, diversions and bypassing of surface water associated with construction and instream works.
- Section 14- Water Permit for non-consumptive groundwater take for sub-soil drainage on an ongoing basis.
- Section 14-Water Permit to take groundwater for a community water supply on an ongoing basis.
- Section 15- Discharge Permit to discharge groundwater associated with the non-consumptive groundwater take (for sub-soil drainage) to groundwater.
- Section 15- Discharge Permit to discharge operational stormwater to surface water and ground during the operational phase of the development.

CRC considers that, based on our understanding of the proposal, the relevant documents identified by the Applicant in the Assessment of Environmental Effects (AEE) is correct, and that the Applicant has assessed their proposal against the relevant Plans, in regard to regional consenting.

CRC understands that the applicant has applied for the duration of 35 years for the following activities:

- Non-consumptive groundwater take (section 14 Water Permit – ongoing take via sub-soil drains)
- Community water supply take (section 14 Water Permit)
- Discharge of groundwater to groundwater (non-consumptive) for sub-soil drainage (section 15 Discharge Permit)
- Operational stormwater discharge from the stormwater system (section 15 Discharge Permit)

All other regional activities for which consent is sought (construction related activities) will be managed through lapse provisions and conditions. The Applicant hasn't specifically provided a duration for these, but CRC would likely look to apply 10-year durations.

Whether that substantive application made available to CRC, meets the requirements of sections 42 and 43 of the FTAA and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the FTAA.

Overall, CRC considers that the application meets the requirements of sections 42–43 of the Act. However, CRC considers that further discussion is required with the Applicant to work through the comments provided in this report. Please refer to Attachment 3 for further details on this matter. Specifically:

1. Information is required to assess Stormwater design and compliance issues with meeting the Waimakariri District Council Engineering Code of Practice 2025.
2. Quantification of changes in land and surface water recharge would ensure effects can be appropriately assessed
3. Dewatering discharge options require further refinement
4. Several gaps in the Water Quality Assessment and Aquatic Ecology Assessment that have not been addressed since CRC's initial pre application review of reports
5. A Remedial Action Plan is required for contaminated land and the Site management Plan lacks detail.
6. Several issues will ned to be worked through with the applicant's experts regarding groundwater
7. CRC's economics expert does not agree with the Applicant's economic assessment.
8. There are several policies and objectives of the Canterbury Regional Policy Statement (CRPS) that CRC's expert has identified as not being met by this proposal.

9. Several amendments will be required to the conditions set out in the application.

Section 42 – Authorised person may lodge substantive application for approvals

CRC considers the Applicant has identified and applied for all relevant RMA consents under CRC's plans, as outlined above.

Section 43 – Requirements for substantive application

CRC considers that the information provided meets the requirements for a substantive application.

General comments from CRC to assist with consideration against s46 FTAA.

Consultation

CRC considers Carter Group Limited has undertaken adequate consultation. CRC considers that the consultation detailed between CRC and Carter Group Limited as set out in Appendix 3 of the applicant's substantive application is accurate and is in-line with the consultation requirements of the FTAA. CRC would have preferred more consultation with the Applicant prior to the lodging of the Substantive Application as it would have provided more opportunity to work through any issues identified at the initial review of technical reports that was undertaken in 2025.

CRC looks forward to continuing to engage collaboratively with Carter Group Limited throughout the Fast-track process, with the aim of supporting efficient and well-informed decision-making.

ATTACHMENT 2: CHECKLIST A – RESOURCE CONSENT, CHANGE TO OR CANCELLATION OF A RESOURCE CONSENT

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	CRC Comment on whether this has been provided
5(1)(a)	A description of the proposed activity.	This has been provided in the Executive Summary section and the Introduction section of the SA. This application consists of a subdivision consent, Land use consents, water permits and discharge permits as well as resource consents for under the NES Freshwater.
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to— i. a statutory area (as defined in the relevant Treaty settlement Act); or ii. ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011.	Provided primarily in the Site Details and Description sections, with additional information throughout the SA. • CRC agrees with the Applicant that the application is not within a statutory acknowledgement area. • The application does not relate to Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019. • This application site is some distance away from the coast, as such it does not relate to Marine and Coastal Area (Takitai Moana) Act 2011.
5(1)(c)	Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being: • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid. *Guidance note: Section 46 provides for the EPA to decide whether the substantive application is complete and within scope. The EPA will need to be satisfied that the application complies*	Provided in the cover letter and throughout the SA and associated documents. CRC agrees with the Applicant that the SA complies with section 42 of the FTAA: • The application has been lodged by the authorised person/entity proposed to hold the approvals sought. • The Applicant is eligible to apply for all corresponding approvals under the specified acts.

	with these requirements. These matters are addressed throughout the substantive application form and relevant checklist.	• The SA seeks resource consent that would otherwise be applied for under the Resource Management Act 1991, and a wildlife approval as defined in clause 1 of Schedule 7 of the FTAA. CRC agrees with the Applicant that the SA complies with section 43 of the FTAA: • The SA is lodged in the form and manner approved by the EPA. • The SA explains how the project is consistent with the purpose of the FTAA. • The project does not involve any ineligible activities. • The approval to be held by each person. • Is not subject to any information requirements specified by the Minister under s27(3)(b)(ii) • It is clearly stated that the project is not a priority project under s43 of the FTAA. CRC agrees with the Applicant that the SA complies with Section 42 of the FTAA: • The SA relates solely to a listed project, and the SA does not involve any ineligible activities as defined in the FTAA.
5(1)(d) and 5(6)	The full name and address of— iii. each owner of the site and of land adjacent to the site; and iv. each occupier of the site and of land adjacent to the site whom the Applicant is unable to identify after reasonable inquiry; If the Applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the Applicant must include a statement to that effect (clause 5(6)).	Provided in Appendix 10- Owners and Occupiers of Adjacent Sites
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates.	Provided throughout the SA. As stated above for 5(1)(a) CRC agrees with the Applicant that there are no other

		activities beyond those set out below that are part of the proposal to which the consent application relates.
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates.	Provided in the SA- under Substantive Application paragraph 35.
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991.	This is provided in the RMA Approvals Assessment Considerations section of the SA. The Applicant has provided assessment of these sections of the RMA.
	An assessment of the activity against any relevant provisions in any of the following documents: • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement: • a regional policy statement or proposed regional policy statement: • a plan or proposed plan: • a planning document recognised by a relevant iwi authority and lodged with a local authority. This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being: • any relevant objectives, policies or rules in the documents listed; and • any requirement, condition, or permission in any rules in any of those documents; and any other requirements in any of those documents.	Provided throughout the Relevant provisions of Planning Instruments section of the SA. Also, in Appendices 33-36 and 42. CRC understand that the SA assess the following legislation: • National Policy Statement for Electricity Networks (NPS-EN) (date) • National Policy Statement for Freshwater Management (NPS-FM) • National Policy Statement for Indigenous Biodiversity (NPS-IB) • National Policy Statement on Urban Development (NPS-UD) • National Policy Statement for Natural Hazards (NPS-NH) • National Policy Statement for Infrastructure (NPS-I) • Canterbury Regional Policy Statement • Canterbury Land and Water Regional Plan • Canterbury Air Regional Plan • Operative Waimakariri District Plan • Partially Operative Waimakariri District Plan • Mahaanui Iwi Management Plan • Te Rūnanga o Ngāi Tahu- Freshwater Policy • Greater Christchurch Spatial Plan CRC agrees with the Applicant that the SA and associated appendices (particularly Appendices 33-36 and 42) assess relevant rules, policies and objectives from the relevant legislation above.
	Information about any Treaty settlements that apply in the area covered by the consent application, including—	Provided in Attachment 1 CRC agrees with the Applicant that there are no Treaty settlements that apply to the Project area.

	v. identification of the relevant provisions in those Treaty settlements; and a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area.	
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or Applicants under the Marine and Coastal Area (Takutai Moana) Act 2011.	Not relevant to this application as far from the Coast
5(1)(k)	The conditions that the Applicant proposes for the resource consent.	Appendix 43: Proposed District Council Consent Conditions Appendix 44: Proposed Regional Council Consent Conditions Appendix 45: Proposed Wildlife Approval Conditions Appendix 46: Proposed Archaeology Consent Conditions
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— vi. a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and if a notice has been received under section 30(5), any more up-to-date information that the Applicant is aware of about the existing resource consent referred to in the notice.	Provided in Appendix 9 - Section 3093)(b) letter from CRC dated 14 April 2026. This is within the timeframe specified in 30(6)(b).
5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6. *Guidance note: See rows below for requirements in clause 6.*	Provided in the document titled "Ohoka Residential Subdivision AEE" and supporting appendices.
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7. *Guidance note: See rows below for requirements in clause 7.*	Provided in the document titled "Ohoka Residential Subdivision AEE" and supporting appendices.
6	(1) The assessment of an activity's effects on the environment must include the following information: (a) an assessment of the actual or potential effects on the environment: (b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use:	As above. - 5(4)(a)

	(c) if the activity includes the discharge of any contaminant, a description of— (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and (ii) any possible alternative methods of discharge, including discharge into any other receiving environment: (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity: (e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal: (f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision: (g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved: (h) an assessment of any effects of the activity on the exercise of a protected customary right. *Guidance note: Clause 6(2) provides that a consent application need not include any additional information specified in a relevant policy statement or plan that would be required in an assessment of environmental effects under clause 6(2) or 7(2) of Schedule 4 of the Resource Management Act.*	
7	The assessment of an activity's effects on the environment must cover the following matters: (a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: (b) any physical effect on the locality, including landscape and visual effects: (c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity: (d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or	As above. - 5(4)(b)

	other special value, for present or future generations: (e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: (f) any unreasonable emission of noise: (g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.	
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991).	Appendix 33 National Planning Instruments Compliance Assessment Appendix 34 Waimakariri District Plan Compliance Assessment Appendix 35 Partially Operative District Plan Compliance Assessment Appendix 36 Canterbury Land and Water Regional Plan Compliance Assessment Appendix 42 Provision Assessment. Note - The Applicant's assessment of this requirement on the checklist form erroneously refers to Appendix 46 rather than Appendix 42.
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document.	Not applicable to this application - I.e., the activity is not to occur in an area that is within the scope of a planning document prepared by a customary marine title group.
5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaitai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	Not applicable to this application - I.e., the activity is not in an area that is taiāpure-local fishery, a mātaitai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996

ATTACHMENT 3: CRC TECHNICAL ADVICE SUMMARY

Technical Team	Technical expert considers all expected technical reports are provided	Technical expert has identified gaps in the provided technical reports [*Consent Planner clarifying comments*]	Technical expert considers the conditions are appropriate	Planner Comments
Contaminated Land	CRC's expert has stated that a Remedial Action Plan (RAP) should be provided with the application.	A Remedial Action Plan (RAP) and / or Site Management Plan (SMP) should be prepared, submitted, and approved prior to earthworks to ensure contaminated materials are appropriately managed and environmental risks are mitigated. The RAP should align with the proposed staging and the SMP. The SMP lacks detail. It should also take into account the DSI and be aligned with the RAP. It should address: • Farm dumps/pits • Potential infilled waterways • Asbestos-containing material (ACM) • Soil sampling • ANZG guideline values The application doesn't detail procedures / methodology around soil re-use, removal, disposal or importation of fill .	In general, conditions are appropriate but will need to be looked at in more detail.	Further quantification will be necessary to be able to provide conclusions. This can be worked through with the Applicant moving forward. .

Surface water Resources	Yes.	CRC's expert has stated that without quantification of changes to spring and surface flows due to changes in land surface recharge and stream alignment, it is difficult to conclude that the effects on downstream flows and wetlands will be negligible. The impact of the decommissioning of bores should be based on water use metering data rather than consented rates.	In general, conditions are appropriate but will need to be looked at in more detail. The Groundwater and spring flow monitoring plan will need to be included in the consent conditions. For dust management, a new consent would need to be applied for in an over-allocated catchment as it is stream depleting.	Further quantification will be necessary to be able to provide conclusions. This can be worked through with the Applicant moving forward. In regard to the dust suppression water, the Applicant and CRC can further discuss options.
Groundwater Resources	Yes	The Executive Summary states shallow bores are said to be more sensitive to drawdown interference than deeper bores which is incorrect. It is clarified in Section 6.2.3 that this refers to shallow bores causing the greatest interference on other shallow bores, and deeper bores on other deeper bores. The dewatering methodology is unknown. Within the Hydrology report, there are numerous statements that effects are '*expected to be negligible'*, but it is unclear how these expectations have been defined. The existing irrigation consents are proposed to be transferred and/or reduced in volume, often as a mitigation/offset for the new activity. This assumes that the existing consents are currently utilized. No information is provided to support this. The application states a reduction in local land surface recharge is not expected to significantly affect groundwater levels or wetland hydrology given that 'that the current contribution of land surface recharge within the development area is small compared to groundwater through-flow'. No assessment has been given of	In general, conditions are appropriate but will need to be looked at in more detail. The 'Groundwater and Spring Flow Monitoring Plan'. in condition 9 of the proposed Excavation/Earth works consent conditions sets out expectations of what a plan will include. As monitoring is already occurring at the site, and excavated areas are outlined on plans, CRC would recommend that a completed monitoring plan is completed and referenced in conditions, not just requiring one be prepared. If consent is granted, aquifer tests with observation wells to determine aquifer parameters and sustainable yield should be a requirement along with an updated interference assessment. The approach for identifying at risk neighbouring drinking water wells for further assessment, then assessing effects is complex, and relies on estimated aquifer properties. Site-specific conditions could lead to higher drawdown than predicted.	Further quantification will be necessary to be able to provide conclusions. This can be worked through with the Applicant moving forward.

		the magnitude of local land surface versus regional catchment zone of the springs to support this statement. The application states potential risks to downstream/gradient properties due to changes in groundwater level or spring flow are *'expected to be negligible'*. Without monitoring data to assess changes over time, or any modelled effects, it is difficult to assess if the effects would be negligible. The proposed 'Groundwater and Spring Flow Monitoring Plan' should be created before any construction and should contain monitoring thresholds for stream flows and groundwater levels based on downgradient impacts – no metrics or suggestions for appropriate metrics are included in the AEE. Without actual well construction and parameters, it is not appropriate to assess exact drawdown potential effects on neighbouring wells. Drain/SMA inflow represents interception of groundwater that may otherwise have flowed toward existing springs/drains. It will vary across the site with changing thicknesses of surficial finer grained deposits. The drain flow will be more significant at times of high groundwater level and may lead to more quickflow component to surface waters. The impact of this interception on existing water courses is not assessed. The auditor notes that local changes in sub-surface permeability such as preferential flow channels mean that drainage will not be evenly spread out across the drainage ditches, but more likely concentrated in some areas (such as the existing springs which are likely fed by such preferential flow). It is impossible to predict this before construction. If granted, monitoring of	Drawdown effects from dewatering on neighbouring wells may be better managed by measuring actual drawdowns during dewatering within piezometers on site between the dewatering location and the nearest drinking water wells as part of consent conditions. ECan typically uses 0.1 m drawdown as a cut-off for interference effects. This could be included within the 'Groundwater and Spring Flow Monitoring Plan'.	

		stream and spring flow before and after construction should occur, but it is likely there will be unavoidable localised changes to the hydrology, even if the overall discharge from groundwater to Ōhoka Stream remains similar. There is no assessment of infiltration losses to groundwater under stormwater management areas, through liners, when the water table is beneath the basin.		
Land Resources	Yes.	Soils are LUC class 2 and 3 and are therefore highly productive or versatile soils. The Application suggests three methods of how dewatering water could be returned. The first is to surface water if quality is sufficient, the second to discharge to exposed gravel layers and the third to return it to stormwater management areas. The second option would reduce the filtering ability by taking topsoil away so may not be appropriate. The third suggestion could be considered as initial pre-treatment prior to discharging to ground. This will need to be discussed further with the Applicant.	In general, conditions are appropriate, but several conditions will need to be tightened up with additional detail. CRC disagrees with conditions regarding dewatering water being discharged straight to groundwater as it will bypass the filtering ability of the soil and risk direct contact with groundwater.	Yes, the soils can be classed as versatile, but the site does not meet the definition in the NPS-HPL. Conditions can be worked through with the Applicant as we move forward through the process.
Natural Hazards	Yes	CRC's expert has stated that the Waimakariri District Council rules and processes to mitigate on and offsite flood risk are appropriate.	No changes to conditions.	CRC will refer to WDC for onsite and offsite flood risk management and mitigation.
Surface water quality and ecology	Yes	The June 2026 water quality assessment was amended and now addresses some but not all of CRCs experts' comments, however the aquatic ecology assessment does not appear to have been amended. Several concerns remain. <u>Water Quality Assessment:</u> Several significant gaps remain.	Several conditions will need to be added to the conditions set regarding mowing, groundwater Draft management and monitoring plans should be provided independently reviewed and approved by CRC. Appropriate discharge quality limits need to be set in conditions.	Additional aspects to be added to reports can be discussed with the Applicant and their expert's moving forward as well as appropriate

		-The streams that stormwater catchments discharge to have not been identified so any assessment of effects has not been undertaken on the smaller more sensitive streams. - There is no assessment of the effects of stormwater discharges on visual clarity, colour or sediment deposition on receiving environments. -Effects on other key water quality parameters known to be affected by storm water discharges have not been assessed. <u>Aquatic Ecology Assessment</u> -Disagree with the change from high intensity land use to urban land use providing potential improvement in ecological outcomes. -The potential effects of stormwater discharges on the receiving environment and ecology have not been technically assessed and there is real risk of them causing effects. -The potential ecological effects of the proposed stormwater discharges on water temp, pH or dissolved oxygen have not been assessed. -The proposal will result in a net loss of stream extent as well as diversions and re-direction of streams. No offsetting or compensation for the proposed loss of stream extent has been proposed. -Do not agree with the conclusion that there will be an overall net improvement in aquatic ecological values.	A trigger value of 50mg/L TSS is inappropriate. A trigger value-based on the degree of change caused by the discharges would be more appropriate.	changes to consent conditions.
Economics	Yes	The Analyses rely exclusively or primarily on EIA, which assesses Project impacts – not Project benefits.	No changes to conditions.	For the purpose of s46, this assessment is not completely necessary,

		The Analyses provide insufficient detail to meaningfully assess the Project's impacts (let alone its benefits). The Project – being an out-of-sequence development that displaces in-sequence development – not being consistent with local or regional planning documents, including spatial strategies. Many of the qualitative Project benefits claimed in the M.E Analysis do not withstand even minimal scrutiny. The quantitative Project impacts assessed in the M.E Analysis untenably assume that all of the housing and other capacity proposed by the Project is strictly incremental when CRC's expert (and Savvy) consider it more realistic that the Project will displace housing and other capacity growth elsewhere. The M.E Analysis further does not account for all relevant Project costs, opportunity costs, or adverse impacts. The M.E Analysis does not follow standard modelling practice. While the Savvy Analysis partially remedies the M.E Analysis' omissions of Project costs, opportunity costs, and adverse impacts, it inherently understates those adverse impacts/costs. Additionally, the Savvy Analysis does not account for social costs arising during the Project's expected 10 year construction phase. The gross impacts of the Project are significantly overstated in the M.E Analysis, while the Project's adverse impacts/costs are significantly understated in the Savvy Analysis.		however CRC has provided their view to highlight this as an issue going forward and something the Panel may want to turn their mind to as part of their decision making.

Stormwater	Yes	CRC's expert has stated that the stormwater design submitted with the application is not compliant with Part 5 of the Waimakariri District Council Engineering Code of Practice 2025 (WDC ECoP). There are pre and post development inconsistencies in catchment area sizer and Post development stormwater run-off is greater than pre-development and these may negatively affect downstream watercourses. There is insufficient information for a tailwater assessment and the inlet pipes to the SMA's and wetlands my become submerged prior to full storage in the SMA. Not compliant with the mowing requirements of the WDC ECoP. Will result in a reduced storage or larger footprint than is within the current design. There is no information regarding seasonal groundwater fluctuations- important to know if SMAs are permanently wet or will dry out. Information is also required to assess impacts on maintenance, plants and the potential for increased resuspension of sediment. The PDP report has not defined responsibility of the construction of swales or cut off drains between Bradleys Rd and the site. LWRP Rule 5.96 needs to be included in PDP report.	Several conditions will need to be added to the conditions set regarding mowing, groundwater fluctuations, treatment efficiency and flow interception.	It appears that with some clarification from the Applicant, the issues identified by CRC's stormwater exp ert can likely be resolved moving forward. CRC's expert has provided some solutions.
Planning	Yes.	The CRC auditor has stated that the Applicant has provided a policy assessment that covers the relevant policies for this proposal. However, after an initial review, they disagree with some of the assessment, especially in relation to:	No changes to conditions	For the purpose of s46, the applicant has provided a suitable policy assessment against

		• Objective 5.2.1: CRC's expert does not agree that the project would achieve well-designed, consolidated urban growth that minimises energy use and supports the efficient and effective use of regionally significant infrastructure. The proposal will result in an increase in transport related emissions and does not justify how the proposal is consistent with this objective. As the proposal is located outside an area planned for growth, the transport and supporting infrastructure required to accommodate an increase in population and associated travel demand for employment, education, and other services has not been identified or planned to support this development. • Objectives 6.2.1 and 6.2.2, and Policy 6.3.1: These provisions clearly direct that urban development within Greater Christchurch should occur within the existing urban area and identified greenfield priority areas. Despite this, the assessment concludes that the proposal is consistent with these provisions. While the assessment relies on the NPS-UD and recent private plan changes to justify the proposal's inconsistency with the CRPS, CRC's expert does not consider that sufficient project-specific assessment or evidence has been provided to demonstrate why those inconsistencies are acceptable in this case. • Policy 6.3.5: The assessment of consistency with this policy is dependent on transport upgrades being delivered by NZTA. As NZTA is a separate entity, and there is no evidence that it has committed to undertaking the upgrades necessary to support this unplanned growth, CRC's expert considers that further consultation with NZTA, or additional evidence demonstrating that the required infrastructure will be delivered, is necessary before consistency with this policy can be established.		the relevant planning documents. The Applicant may respond to or otherwise address these matters. The Panel may consider these matters as part of their decision making.

		• Ultimately, the Applicant's assessment notes the misalignment with the objectives and policies of the CRPS but still considers the proposal presents an opportunity for well-designed urban expansion without what CRC's expert considers to be adequate evidence supporting this statement.		
Consent Conditions	Yes	Conditions have been provided and will need to continue to be worked through with the Applicant moving forward. A thorough review has not yet been undertaken but several amendments will be required.	Several amendments are required to the conditions set and will be worked through at the same time as the technical issues set out above.	Conditions will be worked through with the Applicant moving forward.

ATTACHMENT 4: CRC SECTION 30 RESPONSE

Environment Canterbury Regional Council
Kaunihera Taiao ki Waitaha

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14 April 2026

Meg Davidson
Solicitor
Anderson Lloyd
Meg.Davidson@al.nz

Kia Ora Meg,

Section 30(3)(b) of the Fast-track Approvals Act 2024
Thank you for your email dated 30 March 2026 regarding Carter Group Limited's proposed Ōhoka Residential Subdivision.
We acknowledge that the proposal is listed under Schedule 2 of the Fast-track Approval Act 2024 (FTAA).

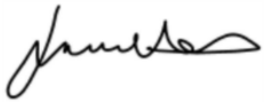
In accordance with section 30(3) of the FTAA, the Canterbury Regional Council is required to:

> *...advise the authorised person—*
> *(a) of any existing resource consent to which section 124C(1)(c) or 165ZI of the Resource Management Act 1991 would apply if the approval were to be applied for as a resource consent under that Act; or*
> *(b) that there are no existing resource consents of that kind.*

The project site is located within the Eyre River Groundwater Allocation Zone. This zone has an allocation limit of 99,070,000 cubic metres, of which 95,055,741 cubic metres is currently allocated, leaving 4,014,259 cubic metres available.
Based on the information provided, the groundwater allocation associated with the application is not expected to result in over-allocation of the Eyre River Groundwater Allocation Zone. **Accordingly, Canterbury Regional Council can confirm that there are no existing resource consents relevant to section 30(3)(b) of the Fast-track Approvals Act.**

Canterbury Regional Council trusts that this clarification provides the necessary information to progress the application under the FTAA. Should you require any further information or clarification, please do not hesitate to contact us.

Ngā mihi



Jo Mitten
Principal Consents Planner

ATTACHMENT 5: UPDATED CRC POSITION REGARDING WATER TAKE AND COMPETING RESOURCE INTERESTS

Environment Canterbury Regional Council
Kaunihera Taiao ki Waitaha

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1 May 2026

Meg Davidson
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RE: Updated CRC Position Regarding Water Take and Competing Resource Interests

Kia Ora Meg,

In Canterbury Regional Council's (CRC) letter in regard to Section 30 dated 13 April 2026, and the subsequent revised version issued on 14 April 2026 correcting a minor error, CRC confirmed that, based on the information available at that time, no existing resource consents were identified as competing for the relevant resource.

CRC has since received and reviewed additional draft technical reports provided by the Applicant. This review has identified further information relevant to the proposed take of water for dust suppression and the potential implications for surface water resources. The report concludes that the proposed take and use of water for dust suppression complies with Rule 8.5.12 of the Canterbury Land and Water Regional Plan (LWRP).

However, CRC does not agree with that conclusion. In CRC's view, condition 1 of Rule 8.5.12 is not satisfied, as the proposed take is considered to have stream depletion effects.
The Ōhoka Stream is currently over allocated, with an existing allocation of 648 L/s against the allocation limit of 500 L/s specified in Table 8(d) of the LWRP. Accordingly, CRC considers that existing resource consent holders are affected parties and are competing for the same resource for the purposes of section 30(3)(a) of the Fast-track Approvals Act.

CRC is aware that a response to the section 30 request has already been provided. Accordingly, CRC raises this matter for the Applicant's attention in anticipation of any further assessment under the Fast-track Approvals Act, and advises that, in CRC's opinion, existing resource consents are competing for the relevant water resource under section 47(1)(b). CRC will also advise the Environmental Protection Authority of this position at the appropriate stage.

CRC considers that this clarification should assist the Applicant in progressing the application. Should you require any further information, please do not hesitate to contact CRC.

Ngā mihi

Anna Stewart
Team Leader – Significant Consents

2. **Consultation with Waimakariri District Council** as the relevant consent authority for the following approvals under the Resource Management Act 1991:

- Resource consent (section 42(4)(a) of the Act)

Overall, WDC does not believe the application contains sufficient information to meet the purpose of sections 42-44 of the Act. Some of the concerns raised are addressed in the above tables and are predominantly not completeness matters but rather matters for the Panel to consider once appointed. WDC's primary concerns are:

a. Insufficient information to substantiate the claimed economic benefits and associated costs.
b. Inadequate Integrated Transport Assessment.
c. Inadequate Ecological Impact Assessment.
d. Insufficient assessment of wastewater servicing alternatives.
e. Inadequate water supply assessment.
f. Insufficient evidence demonstrating the feasibility of the proposed stormwater management approach.
g. Insufficient urban design assessment
h. Insufficient landscape assessment
i. Insufficient assessment of neighbourhood reserve provision.
j. Inadequate earthworks plan

Waimakariri District Council
215 High Street
Private Bag 1005
Rangiora 7440, New Zealand
Phone 0800 965 468

Our Reference: FTAA-2606-1253 / 260709164999

9th July 2026

Emma Fahey
Environmental Protection Authority
info@fasttrack.govt.nz

Kia ora Emma,

Thank you for your letter, dated 2 July, regarding the Ōhoka Residential Subdivision application from Carter Group Limited (the Applicant).

The Council notes that this proposal is materially the same as previous applications to the Council (under Rolleston Industrial Developments Limited), being submitted first as a plan change and then as a rezoning request through our District Plan Review process and have already been declined by independent panels. In each of these cases there were outstanding issues relating to transport, greenhouse gas emissions, stormwater, flooding, servicing, and overall appropriateness of the development. In particular, that it would not contribute to a well-functioning urban environment of the Waimakariri District or Greater Christchurch.

Through the District Plan Review process, significant residential rezoning of 14,000 to 17,000 additional lots, has been approved in locations that align with anticipated growth directions. This has substantially increased the amount of land available for residential development. The District Plan has only recently been adopted and therefore has only been partially operative for a very short time.

As a result, the plan-enabled capacity is now materially different from when the Ōhoka Residential Subdivision was listed in the Fast-track Approvals Act 2024. Given the extent of residential land now zoned, Council considers that the proposal does not align with the purpose of the Act in terms of development projects with significant regional benefits.

For the reasons outlined, Council feels this application should not progress under the Act.

Please find below the response from the Waimakariri District Council (Council) on the completeness of the Applicant's Substantive Application under the Fast-track Approvals Act 2024 (the Act / FTAA).

Whether that substantive application made available to Waimakariri District Council, meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

Overall, Waimakariri District Council considers that the application does not meet the requirements of sections 42–43 of the Act. Therefore, Council consider the application as incomplete. The key matters underpinning this assessment are summarised below:

a) Insufficient information to substantiate the claimed economic benefits and associated costs.
b) Inadequate Integrated Transport Assessment.
c) Inadequate Ecological Impact Assessment.
d) Insufficient assessment of wastewater servicing alternatives.
e) Inadequate water supply assessment.
f) Insufficient evidence demonstrating the feasibility of the proposed stormwater management approach.
g) Insufficient urban design assessment
h) Insufficient landscape assessment
i) Insufficient assessment of neighbourhood reserve provision.
j) Inadequate earthworks plan

On this basis, Council is not satisfied the application contains sufficient information and detail to meet the purpose of sections 42–44 of the Act.

Council's detailed comments on each of the matters identified above are set out in Table 1 attached.

Your sincerely

Kelly LaValley

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General Manager Planning, Regulation and Environment

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Table 1: Council Comments on Completeness of the Ōhoka Residential Fast Track Application

Topic	Comments
Economic Benefits	1. **Development timeframe, discounting, and benefit realisation:** The assessment does not account for the timeframe over which the development is expected to occur. As a result, the estimated benefits are likely overstated because they are presented in nominal terms and have not been discounted to present values. To enable a consistent comparison with the assessment of costs, the estimated benefits should also be converted to present values using an 8% discount rate, reflecting the timing of when benefits are expected to be realised. This omission is particularly important given the subsequent issues identified are all inherently time-dependent and will affect the timing and profile of benefit realisation. Failure to incorporate these dynamics risks overstating both the magnitude and immediacy of net economic benefits. 2. **Gross economic impacts vs net economic benefits:** The assessment refers to "net economic benefits"; however, the reported GDP and employment impacts are presented in gross terms, with no adjustment to estimate the net economic benefits. Cost assessment indicate that much of the proposed development is unlikely to be net new to the Waimakariri District or the wider region, but rather displaced from elsewhere. As a result, the reported GDP and employment impacts are likely to overstate the net economic benefits attributable to the development. 3. **Geographic scope of benefits:**

	The FTAA requires that economic benefits be significant at the regional level; however, the assessment primarily reports impacts at the local level. The assessment should clearly identify the appropriate geographic area for evaluating economic benefits under the FTAA and demonstrate that the significance threshold is met at that scale. If the relevant assessment geography is the region, then reliance on local-level impacts will overstate the significance of the proposal. 4. **Settlement population:** The assessment reports population at the SA2 level, which includes the wider rural and rural lifestyle areas surrounding Ōhoka. This overstates the size of the settlement and may give a misleading impression of the scale of the local community. The population of the Ōhoka settlement should instead be assessed using Census or Stats NZ data at the SA1 level, which more accurately reflects the settlement itself. 5. **Housing affordability:** The assessment considers housing affordability in the Waimakariri District in isolation, without comparing outcomes across the wider Greater Christchurch Partnership area or other Tier 1 urban environments. It also does not consider observed market outcomes, which indicate that housing in Waimakariri is generally more affordable than in many comparable Tier 1 urban areas. Consequently, the assessment provides limited evidence that housing affordability is a significant issue requiring intervention through the proposed development. Furthermore, the assessment does not provide an indication of the likely cost of housing within the proposed development itself. This could be estimated using the assumed construction costs and land development costs to

	determine whether the proposed dwellings are likely to improve housing affordability in practice. 6. **Development capacity** The assessment relies on the WCGM22 capacity assessment, which is now out of date. Since its publication, the Proposed District Plan has enabled a significant increase in residential development capacity, particularly through additional greenfield zoning. The assessment should consider the implications of this additional capacity when evaluating the need for the proposed development. The application should also assess the extent to which redevelopment and intensification opportunities are likely to increase over time, providing further feasible development capacity within the district. Consequently, the assessment does not provide an up-to-date or complete picture of the availability of residential capacity. 7. **Monopolistic conditions, market power, and partial monopoly:** The assessment does not provide evidence supporting the presence of monopolistic conditions or significant market power in the Waimakariri housing market. Available indicators, including recent price trends and observed developer activity, suggest that prices have been declining and that supply is being delivered by multiple developers in a competitive market environment. In addition, price-to-cost ratios appear to be broadly within competitive ranges, which is not consistent with the existence of sustained market power or constrained competition. As a result, the assertion of monopolistic conditions is not substantiated by the available evidence. 8. **Centre occupancy and phasing**

	The assessment does not incorporate development phasing or model the likely uptake and occupancy trajectory of the proposed centre over time. Instead, it relies on an economic cost assessment that does not explicitly evaluate demand for floorspace, tenancy absorption rates, or the timing of occupation. As a result, there is limited evidence as to how quickly the centre would reach viable occupancy levels or whether sufficient demand exists to support sustained tenancy. A more robust assessment would explicitly model occupancy uptake over time, linked to realistic demand forecasts and staged development delivery.
Economic Costs	1. **Urban form and economic efficiency** The assessment does not consider the economic costs associated with facilitating growth in the proposed location relative to more central or higher-density areas. From an urban economics perspective, dispersing growth to peripheral locations can increase infrastructure servicing costs, transport costs, and wider agglomeration inefficiencies compared with accommodating growth in more central locations where existing networks, amenities, and labour market access are stronger. These factors can reduce overall economic productivity and weaken the efficiency of urban form. Accordingly, the assessment does not adequately address whether the proposed location supports a well-functioning urban environment when compared with alternative, more central development locations. 2. **Infrastructure costs and network efficiency** The assessment does not quantify the full infrastructure implications of the proposed development. While development contributions may recover a portion of infrastructure costs in the immediate location, the analysis does not assess the broader system-wide effects, including the potential duplication of infrastructure capacity and reduced utilisation of existing infrastructure

	elsewhere in the network. This may result in underutilised sunk assets and slower cost recovery in other areas, generating inefficiencies at the district level. These wider economic costs are not quantified in the assessment. A more complete analysis should estimate both the incremental infrastructure costs in the development location and the opportunity costs associated with reduced utilisation of existing infrastructure across the wider network. 3. **Floorspace viability and demand modelling:** The centre assessment does not model demand for other retail, commercial, community, and health-related activities. It only assesses food, grocery, and liquor activity. As a result, there is limited evidence supporting the proposed scale and composition of floorspace within the LCZ. Given the relatively large provision of floorspace, the assessment should provide clear modelling justification for the quantum and mix of space proposed, including expected uptake rates across different activity types and alignment with local and district-wide demand projections. In the absence of such analysis, it is unclear whether the proposed floorspace can be fully supported by underlying demand or whether it risks over-provision relative to realistic absorption rates.
Transport	1. **Public transport services** Assessment or proposal of public transport services is required. 2. **Integrated Traffic Assessment** The Integrated Traffic Assessment (ITA) does not assess all relevant transport matters, including public transport use, walking and cycling access, accessibility by a range of transport modes, pedestrian access to the nearest

	bus stop, anticipated trip generation for all transport modes, cumulative transport effects, and consistency with the local and regional transport policy framework, including the Canterbury Regional Land Transport Plan 2021-31. 3. **Crash prediction modelling** The ITA makes multiple references to crash prediction modelling. This modelling has been undertaken for intersections only, with no modelling provided for midblocks.
Wastewater	An assessment of alternatives for wastewater disposal is required. The reasons are as follows: 1. The proposal for a pressure sewer system is not in accordance with Council's Wastewater Policy, which requires a gravity system to be used. It is not considered that the thresholds for a pressure system have been met. 2. The method used to estimate the flow rate and volume of sewage to be discharged does not adequately factor in the level of inflow and infiltration expected, and therefore the flow rates and volumes used in the assessment are underestimated. 3. The proposal to discharge via a connection into the existing rising main is not considered feasible, particularly as the flows have not been accurately estimated. • The proposal to store a large volume of wastewater is not considered an acceptable outcome, particularly given its proposed proximity to a residential area and concerns that the required storage volume has not been correctly calculated. 4. There is a capacity constraint at the Rangiora Wastewater Treatment Plant, which is limiting the amount of flow it can accommodate at the present time. There is also a large amount of other land that has been rezoned within the Rangiora WWTP catchment. Therefore, it is not considered to have sufficient capacity to accept the additional flow from this proposal.

Water Supply	The water supply assessment is insufficient for the following reasons: 1. The yield of the proposed production wells has not been established, and the final well locations have not been confirmed. The strategy assumes that four to five wells will be capable of meeting the projected demand; however, this has not been supported by pump testing, yield assessments, or hydrogeological modelling. It cannot be assumed that the required level of supply is achievable without supporting evidence. 2. No storage sizing calculations have been provided. Without this information, it is not possible to assess whether sufficient land has been allocated for the treatment and storage infrastructure. 3. No headworks site has been identified. The location and footprint of the treatment plant, storage reservoirs, pump station, and associated infrastructure should be confirmed at the consenting stage to ensure sufficient land is available and that the proposed subdivision layout does not compromise future operation and maintenance requirements. 4. No hydraulic modelling has been provided to demonstrate compliance with the required levels of service, including pressure, flow, firefighting performance, and network operation under peak demand conditions.
Stormwater	There is insufficient evidence to demonstrate the feasibility of the proposed stormwater management approach. In particular: 1. There is limited ability to assess whether the proposed Stormwater Management Areas (SMAs) can physically accommodate the required treatment, attenuation, and conveyance functions based on the information provided. The land area currently allocated for stormwater management may be insufficient to accommodate the required stormwater infrastructure. 2. The proposed attenuation strategy relies heavily on offset storage between catchments, particularly the use of the polo field to provide attenuation along with the balancing of storage requirements between multiple catchments. The evidence acknowledges a current attenuation storage shortfall and states this will be addressed through future optimisation. If there is shortfall it should be resolved now.

	3. Further assessment of downstream volumetric effects and flow regime changes resulting from the proposed development. This is required as the evidence provided focuses on attenuation of peak flows and does not provide a detailed assessment of downstream volumetric effects. There is insufficient information to demonstrate that the development will not alter the volume, duration, or timing of discharges to downstream waterways and drainage networks 4. Assessment of the stormwater network and confirmation that both the primary and secondary flow paths can safely convey the design event without causing adverse effects on the proposed development or the downstream stormwater system.
Ecology	A full ecological impact assessment is required for the following reasons: 1. The avifauna survey outlines what is on site but does not attribute a value to the features, outline the potential impacts during development or operational phases, or recommend appropriate mitigation or compensation. The letter states that the site is of low ecological value and that removal is unlikely to significantly disrupt habitat connectivity, but it does not address the value of habitat for foraging, roosting, and nesting; mitigation for protecting breeding birds; or any compensation such as landscaping. While many species are not threatened, the observation of a tūī could be classed as locally or regionally significant, but this is not discussed. 2. The lizard management plan provides survey information; however, there has been no value assessment of the faunal SNA and no assessment of impacts on habitat, including how much lizard habitat is being permanently removed, what compensation is required, and what the impact is on the lizard population.
Neighbourhood Reserves	The application does not provide sufficient information to demonstrate how neighbourhood reserve provision has been determined or assessed against Waimakariri District Council's level of service requirements. In particular, insufficient information has been provided to demonstrate:

	a) Whether neighbourhood reserve provision meets the Council's level of service standard of 1 hectare per 1,000 residents. b) The total area, location and distribution of neighbourhood reserves proposed across the development. c) Whether neighbourhood reserves will achieve the 500-metre walking catchment for residents. d) Whether proposed neighbourhood reserves are of sufficient size, dimensions and configuration to support their intended recreational function, including informal recreation and junior sport activities. e) The extent to which the proposed reserve network is capable of achieving the relevant level of service outcomes for future residents. As a result, it cannot be determined whether the proposed neighbourhood reserve network is adequate to serve the anticipated population or whether the development appropriately provides for neighbourhood-level recreation outcomes.
Landscape	**1. Rural Openness to Urban Form** The landscape assessment contains insufficient information to support the reliance placed on the permitted baseline, particularly given the scale and significance of the proposal. The assessment does not provide a sufficiently detailed evaluation of the qualitative difference between dispersed rural lifestyle subdivision and the proposed contiguous urban form, nor does it adequately justify the conclusion that landscape effects would be Low–Moderate having regard to the scale, density and permanence of the proposed change. **2. Planting Mitigation** The landscape assessment places significant reliance on proposed planting as effective mitigation, but contains insufficient information to demonstrate that this mitigation is achievable or effective relative to the scale and significance of the proposal. In particular, limited detail has been provided on planting stages or phases, the size and maturity of trees and vegetation at the time of planting,

	the assessment year or growth stage relied on for the visual effects assessment, and the maintenance and management measures required to ensure planting is successfully established and retained over time. 3. **Landscape Treatments and Boundary Interfaces** The landscape assessment contains insufficient information to demonstrate how the proposed landscape treatments and boundary interfaces would appropriately reflect or respond to the existing landscape character. Most of the proposed planting appears to be new. Given that much of the existing character is derived from established exotic tree species and vegetation patterns, further detail is required for each landscape treatment area to understand the proposed species palette, the appropriateness of those species, and how the treatments would maintain, reinforce or appropriately transition from the existing character. 4. **Landscape Management Plan** The application does not include a Landscape Management Plan. Given the scale and complexity of the proposed Ōhoka development, a Landscape Management Plan is required to demonstrate how the long-term care, maintenance, replacement, and performance of landscape areas will be achieved.
Urban Design	1. **Urban Form Relationships** The assessment contains insufficient information to demonstrate how the proposal's urban form would integrate at district and regional levels. It does not provide a sufficiently detailed assessment of the relationship between efficient land use, multi-modal accessibility and the intensity of built form, including whether the proposal reflects transit-oriented development principles or other

recognised urban form outcomes, and whether the proposal would contribute to a well-functioning urban environment.

2. **NZ Urban Design Protocol**

The assessment against the NZ Urban Design Protocol contains insufficient information and is generally light relative to the scale and significance of the proposal. It does not provide a sufficiently detailed or evidence-based assessment of the relevant protocol outcomes, and several assertions are not supported by clear references or analysis, including statements regarding the effect of constraints on existing planned infill and greenfield growth areas. In several instances, including the assessment of 'creativity' and 'collaboration', the commentary is limited and is similar in length to the definition being assessed. A number of responses also do not fully address, or are not closely correlated with, the definitions set out in section 1.1.2 of the Urban Design Assessment. As a result, the assessment does not provide sufficient information to determine whether the proposal appropriately responds to the NZ Urban Design Protocol or supports good urban design outcomes.

3. **Crime Prevention Through Environmental Design**

The Crime Prevention Through Environmental Design (CPTED) analysis contains insufficient information and is not sufficiently detailed relative to the scale and significance of the proposal. It does not fully assess each of the four principles outlined in the National Guidelines for CPTED (2005) prepared by the Ministry of Justice, including Surveillance, Access Management, Territorial Reinforcement and Quality Environments. The assessment also relies on the stated intention that the scale and character of buildings will reflect the existing character of Ōhoka, including the use of materials and forms sympathetic to the existing context and rural vernacular. However, no design guidance, assessment criteria or other mechanisms have been provided to manage these effects, substantiate this intention, or demonstrate how it would be delivered through the proposal. As a result, the assessment does not provide sufficient

	information to determine whether appropriate CPTED and built-form outcomes would be achieved.
Earthworks	**1. Cut and Fill Plan** The information provided does not include a detailed cut-and-fill plan showing the extent and depth of proposed earthworks across the site, instead identifying on broad areas of cut and fill. The scale of the proposed level changes is important to understand, as it will influence whether retaining walls, battered slopes, or other engineering solutions are required. This information is also necessary to assess potential effects on lot layouts, fencing, accessibility, and ongoing maintenance responsibilities.

3. **Consultation with the Department of Conservation** as the administering agency for the following Act:

- A wildlife approval as defined in clause 1 of schedule 7 of the Act (section 42(4)(h) of the Act)

DOC considers that the application meets the requirements of sections 42, 43, and 44 of the Act. However, DOC raises matters to be addressed by the applicant during the Panel stage.

Department of Conservation advice for EPA compliance assessment

Overview

Project name	Ōhoka Residential Subdivision
Project applicant	Carter Group Limited
EPA unique ref. no	FTA-2606-1253
EPA Request Number	CRM:0139017401
Conservation approvals sought	**Wildlife approval** • To capture, handle and relocate native lizards.
EPA request overview	**Completeness check** Determine the requirements of sections 42 and 43 of the Act have been provided in sufficient detail to satisfy the purpose for which it is required, in accordance with section 44 of the Act. Including whether relevant matters listed in clause 2 of Schedule 7 have not been addressed or have not been provided in sufficient detail.
Date due to EPA	13 July 2026

On 2 July 2026, the Department of Conservation (DOC) received a request from the EPA seeking its views whether the application meets the requirements of sections 42 and 43 of the Fast-track Approvals Act 2024 (the Act) and whether the information is in sufficient detail to satisfy section 44 of the Act.

The purpose of this document is to provide advice to assist the EPA in making its decision whether the application lodged by Carter Group Limited on 1 July 2026 complies with the requirements of section 46(2) of the Act.

The advice also includes further observations of relevance to further processing of the application, for example where further information could be needed for a decision by the panel.

DOC understands that this document will be passed on to the applicant, the Panel Convener and the Panel.

Compliance with information requirements

Our detailed assessment of the information requirements for the relevant approval is provided in the attached table. In summary, DOC's advice is that the application meets the requirements of sections 42, 43, and 44 of the Act.

Notification and Consultation

Section 29(1)(aa) of the Act requires that, from 1 April 2026, before lodging a substantive application for a listed project, the authorised person for the project must notify in writing relevant administering agencies. DOC is a relevant administering agency for this application.

DOC is a relevant administering agency for this application. The applicant undertook consultation with DOC between January and August 2025 as required by Sections 11 and 29 of the Fast-track Approvals Amendment Act 2024 (Amendment Act), prior to the Amendment Act introducing changes to Section 11. As consultation was undertaken prior to the second commencement date of the Amendment Act, notification was not required under Section 29(aa).

Further information

Although DOC's advice is that the application meets the requirements of sections 42, 43, and 44 of the Act, DOC considers that the following information will be important for further processing and deciding on the application. Therefore, we intend to recommend that further information is required as to the extent of habitat to be salvaged/lost, from the Applicant's herpetologist, Pattle Delamore Partners.

This is due to protection almost exclusively being provided for by the salvage operation. Even if the salvage effort is significant, it is likely only a small portion of the lizards will be salvaged and therefore the proposal will result in a reasonable residual effect. This is typically addressed by offering compensation, or by ensuring the release site is much, much larger than the area impacted. In order to understand whether the release site sufficiently addresses the residual effect, the area of habitat to be lost must be quantified.

Applications for wildlife approvals

Clause 2 of Schedule 7 outlines the information required in an application for a wildlife approval.

Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N	Comments
Schedule 7 clause 2(1) - For the purposes of section 43(3)(h), an application for a wildlife approval must include the following information:				
(a) specify the purpose of the proposed activity:	Y	AEE, Executive summary, para. 26; AEE, para. 239, Page 51; AEE, paras. 518 -524: Page 118 – 119; AEE, paras. 698 – 702: Pages 150 and 151. Appendix 24- LMP (Lizard Management Plan): Page 6-7	Y	
(b) identify 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):	Y	AEE, paras. 518 -524: Page 118 – 119; Appendix 24, Section 3 of LMP- Lizards effects assessment. Section 6 Release site of the LMP.	Y	Locations are not PCL.
(c) include an assessment of the activity and its impacts against the purpose of the Wildlife Act 1953:	Y	Appendix 24, LMP, Section 3, Appendix A, Section 3.0, Page 2 and throughout.	Y	

Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N	Comments
(d) list 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:	Y	Appendix 24 LMP. Section 3, Page 12 – 15. Appendix 24 LMP Appendix C Baseline Lizard Survey, Section 2.1.	Y	The applicant has identified the location of habitat but has not defined the size of the lizard habitat area or provided definitive boundaries on where they might be.
(e) outline impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System):	Y	Appendix 24 LMP. Section 3.3, Pages 15-16.	Y	There is one At Risk species; Canterbury grass skink.
(f) state how the methods proposed to be used to conduct the actions specified under paragraph (b) will ensure that best practice standards are met:	Y	Appendix 24 LMP. Section 2.2, Page 7. Appendix 24 LMP. Sections 4.0 -10 Page 7 – 30.	Y	The applicant has mostly met current practice although there is uncertainty on whether the size of the lizard release area is as large (or larger) than the area of lizard habitat that will be lost, which would be best practice.
(g) describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Y	Appendix 24 LMP. Section 5.3 – 5.4, Pages 19-21.	Y	Methods have been described and do not require ethics approval.
(h) state the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available):	Y	Appendix 24 LMP. Section 3.0, Page 9 and 14. Appendix 24 LMP. Appendix A. Appendix 24(b) Masterplan, Appendix 26 Scheme Plans	Y	Information is adequate although the Lizard Management Plan would benefit from providing more definitive boundaries on where lizards will be salvaged from (i.e. provide boundary on fig 5).

Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N	Comments
(i) state whether authorisation is sought to temporarily hold or relocate wildlife:	Y	AEE, para. 36, Page 8; Appendix 24, LMP, Section 3, Appendix A, Section 3.0, Page 3	Y	
(j) list 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:	Y	AEE, paras 518 – 524. Pages 118 – 119.	Y	
(k) 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):	Y	Appendix 24, LMP, Section 3.4, Pages 16 – 17. Appendix 24, LMP, Section 4.0, 5.0, and 6.0 Pages 17 - 27 Appendix 45, Proposed Wildlife Approval Conditions.	Y	
(l) state 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:	Y	Covering Letter for the Substantive Application, Page 11.	Y	
(m) state whether the applicant or any company director, trustee, partner, or anyone else involved with the	Y	Appendix 24 LMP. Appendix A. Section 3.0 Table 2.	Y	

Relevant section	Is the information present? Y/N	Application document reference	Is the information provided in sufficient detail? Y/N	Comments
application has any current criminal charges under the Wildlife Act 1953 pending before a court:				
(n) provide proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts:	Y	Appendix 6, Consultation Record with Relevant Iwi Authorities, Hapū and Treaty Settlement Entities	N/A	DOC is unable to determine the sufficiency of engagement with iwi or hapū.
(o) provide any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal.	Y	Appendix 24- LMP. Qualification details of the Project Manager and Project Herpetologist provided in section 2.3 of the LMP- page 8-9.	Y	LMP prepared by PDP for Carter Group Limited (the Applicant).

4. **Consultation with the Heritage New Zealand Pouhere Taonga** as the administering agency for an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 (section 42(4)(i)).

HNZPT confirms that all documentation has been provided that is required for an archaeological authority application. Full response from Heritage New Zealand:

HERITAGE NEW ZEALAND
POUHERE TAONGA

Competing Interests and Completeness check for project under the Fast Track Approvals Act 2024

Ōhoka Residential Subdivision, FTAA 2602-1253

Contact Details	
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)
Contact person	HNZPT Fast-track Team
Contact Number	(04) 470 8053
Email	fasttrack@heritage.org.nz

Introduction

1. Carter Group Limited (the Applicant) lodged a substantive application for Ōhoka Residential Subdivision (the Project) with the Environmental Protection Agency (EPA).
2. On 2 July 2026 the EPA requested feedback regarding completeness to determine whether the substantive application complies with section 46(2) of the FTA Act.
3. HNZPT has also undertaken a check for competing applications to assist in determining if there are any competing applications or existing resource consents under section 47 of the FTA Act.

Completeness Check

4. HNZPT confirms that all documentation has been provided that is required for an archaeological authority application.

Competing Interests Check

5. HNZPT confirms that there are no current competing archaeological authority applications under the Heritage New Zealand Pouhere Taonga 2014 Act that relate to the same activity and site.