

YOUR COMMENT ON THE JOHN PATERSON ESTATES

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Canterbury Regional Council (Environment Canterbury)		
First name	Dwayne		
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2.			
☒	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

Thank you for your comments

13 July 2026

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Kia ora Stephanie,

Thank you for your letter received on 19 June 2026 regarding the John Paterson Estates project from John Paterson Estates Limited.

Please find attached the response from Canterbury Regional Council (CRC) to the specific questions raised in the above letter. Also included within the response are general comments on the proposal which may assist the Minister in making their determination under section 21 of the Fast Track Approvals Act 2024 (FTAA).

CRC trusts that these comments will assist the Minister in determining whether to accept the referral application and proceed with referring the project. Should any further information be required, please do not hesitate to contact us.

Ngā mihi

A handwritten signature in black ink, appearing to read "Dwayne Daly".

Dwayne Daly

Principal Consents Planner

CANTERBURY REGIONAL COUNCIL COMMENTS UNDER S17 FTAA – JOHN PATERSON ESTATES

1. Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.

CRC can confirm that no such applications exist.

The Applicant has proposed to take groundwater as a Permitted Activity under Rule 5.113 for dust suppression and to take groundwater for dewatering as either a Permitted Activity or as a Restricted Discretionary Activity under Rule 5.119 if the Permitted Activity criteria cannot be met. There is no proposed take and use of groundwater beyond the construction phase.

The site is within the Christchurch West-Melton Groundwater Allocation Zone and there is no numerical allocation limit for groundwater in this zone. Rather, as per the CLWRP Allocation Limit (9.6.2) for the zone:

In general, no additional water is to be allocated from the Christchurch West-Melton Groundwater Allocation Zone shown on the Planning Maps except for group or community water supply as set out in Rule 5.115 or for non-consumptive taking and use as set out in Rules 5.131 and 5.132.

However, as water is to be taken under Rule 5.113 for dust suppression as a permitted activity, and under either Rule 5.119 or 5.120 for dewatering, none of which allocate groundwater, the application would not result in additional water being allocated from the Christchurch West-Melton Groundwater Allocation Zone.

As there is no numerical allocation limit, any application for a new groundwater water take resulting in allocation (except for those provided for under Rules 5.115, 5.131 and 5.132) would be a prohibited activity regardless of the current application. Similarly, if this application were granted allocation, that would not prevent future applications from being allocated groundwater under Rules 5.115, 5.131 or 5.132.

The Applicant also seeks to take surface water non-consumptively from Knights Stream. The application contains no details of the take so CRC cannot confirm the nature of the take. However, if the take is non-consumptive, as stated in the application, no surface water would be allocated.

Therefore, there are no competing applications as per the FTAA.

2. In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please provide written confirmation.

CRC can confirm that no such applications exist, for the reasons discussed in response to Question 1.

3. Identification of significant adverse effects that may be generated by the project.

The referral application contains insufficient detail to determine if the project would have significant effects on the environment. However, based on the information available at present and taking into

account the comments of CRC's technical auditors (see comments below), it is unlikely that the project would have significant adverse effects on the environment.

4. If the project aligns with the Regional Policy Statement, Regional Plan, or any strategy or spatial planning document.

Canterbury Regional Policy Statement (CRPS)

The Canterbury Regional Policy Statement (CRPS) gives an overview of the significant resource management issues facing the region, including issues of resource management significance to Ngai Tahu. The purpose of the CRPS is to set out objectives, policies and methods to resolve those resource management issues and to achieve the integrated management of the natural and physical resources of Canterbury.

The CRPS seeks to ensure development, including the associated use and provision of infrastructure and services, appropriately manages adverse effects on the environment in order to enable people and communities to provide for their social, economic and cultural well-being.

Development can either enable or adversely affect the ability of people and communities to provide for their social, economic and cultural well-being, and health and safety. Once development is established it is likely to exist for a number of generations. Changing the form and structure of established urban, rural-residential and rural areas can be difficult and expensive. Therefore, the CRPS seeks to achieve a robust form of development that is responsive in the long term to changing needs of people and communities

Land-use and infrastructure require coordination and integration in order to ensure potentially significant benefits to people and the community are achieved and that the adverse effects on the environment are appropriately avoided, remedied, or mitigated and/or controlled.

Overall, the proposal appears to be broadly consistent with the CRPS, subject to adverse effects on the environment being appropriately avoided, remedied, or mitigated and/or controlled. However, CRC anticipates that the applicant would provide a comprehensive assessment of adverse effects as well as suitable Management Plans addressing adverse effects within a substantive application (if referred).

If the substantive application can appropriately address adverse effects, the proposal would likely be consistent with the CRPS. However, a detailed assessment against the relevant objectives and policies of the CRPS should be provided as part of the substantive application. Until that assessment is provided, CRC cannot confirm whether the proposal is fully consistent with the CRPS, particularly in relation to urban growth, infrastructure sequencing, natural hazards, and loss of productive land.

CRC notes that the CRPS generally reflects the RMA terminology of avoiding, remedying or mitigating adverse effects. The FTAA also provides for offsetting and compensation as potential measures to address adverse effects where appropriate.

The relevant CRPS policies are provided in Appendix 1.

Canterbury Land and Water Regional Plan (CLWRP)

The CLWRP sets out objectives and policies that identify the importance of high-quality freshwater for social, cultural and economic wellbeing, and that recognise the connectivity between land-use and the various sources of freshwater. The CLWRP also recognises that land-use and development will occur but can have adverse effects on the quality of freshwater, if not appropriately managed. Consequently, the CLWRP seeks that land-use and development occur in a manner that avoids, remedies or mitigates adverse effects on the biophysical and cultural values, including Ngāi Tahu values, of freshwater in Canterbury.

CRC anticipate that the applicant would provide within the application a fulsome assessment of adverse effects as well as comprehensive Management Plans addressing adverse effects of earthworks, disturbance of contaminated land, and stormwater during the construction phase, in accordance with best practice. The Applicant has stated that stormwater would be discharged under the Christchurch City Council's global consent and that wastewater from the proposed subdivision would be connected to reticulated Council infrastructure. CRC anticipate that a suitable civil engineering details would be included within the application. If a substantive application contains the appropriate assessment, including the relevant specialist assessments and Management Plans, the proposal would likely be consistent with the CLWRP.

The applicant has identified consents that may be required but has not identified what consents they actually require or would seek consent for, if referred. There is insufficient information in the application for CRC to determine the relevant rule considerations at this stage. CRC notes that a detailed application and rule assessment will need to be provided before CRC can provide an equally detailed assessment.

The relevant CLWRP policies are provided in Appendix 1.

5. whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act)

The Application states that the project does not involve any ineligible activities. Additionally, CRC is not aware of the activity involving any ineligible activities as defined in Section 5 of the Act.

6. whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of Act)

Reasons to decline a referral application under subsection (4) include the following:

(a) the project would be inconsistent with any of the following:

- (i) a Treaty settlement:
- (ii) the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019:
- (iii) the Marine and Coastal Area (Takutai Moana) Act 2011:
- (iv) a Mana Whakahono ā Rohe:
- (v) a joint management agreement:

CRC is not aware of any reason why the proposal would be inconsistent with any of the above matters.

(b) it would be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts:

CRC is not aware of any reason why the matters to be authorised by the proposed approvals would be more appropriate to deal with under another Act.

(c) the project may have significant adverse effects on the environment:

The referral application contains insufficient detail to determine if the project would have significant effects on the environment. However, based on the information available at present and taking into account the comments of CRC's technical auditors (see comments below), it is unlikely that the project may have significant adverse effects on the environment. This view is preliminary and would need to be confirmed through the substantive application process, including through a full assessment of effects and technical review.

(d) the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) has a poor compliance history under a specified Act that relates to any of the proposed approvals:

John Paterson Drive Estates Limited have no prior consents with CRC and therefore there is no compliance history to comment on.

(e) an aquaculture activity or an activity that is incompatible with aquaculture activities –

The proposal does not involve aquaculture.

*(f) the project includes an activity that is a prohibited activity under the **Resource Management Act 1991**:*

The referral application contains insufficient detail to conclusively determine the applicable rules or what consents are required. Based on the information available the proposal does not include an activity that would be a prohibited activity under the Resource Management Act 1991.

(g) a substantive application for the project would have 1 or more competing applications:

CRC does not hold a record of any competing applications (per the definition in the Fast-track Approval Act 2024 (FTAA)) in the same project area.

*(h) in relation to any proposed approval of the kind described in **section 42(4)(a)** (resource consent), there are 1 or more existing resource consents of the kind referred to in **section 30(3)(a)**.*

There are no existing consents of the kind specified in section 30(3)(b) of the FTAA.

GENERAL COMMENTS FROM CRC TO ASSIST WITH CONSIDERATION AGAINST S22 FTAA

Regional or National Benefits

CRC has not undertaken a peer review of the Economic Assessment prepared by Insight Economics and submitted by the Applicant in support of their referral application. However, CRC recognises that the proposal would enable approximately 510 residential lots to be constructed, along with supporting infrastructure including roading, stormwater management and three waters services.

The Economic Assessment noted that the proposal would enable an increase in housing supply in the wider Christchurch area, which may help to meet the demand for housing in and around Christchurch by enabling a substantial increase in housing capacity in a strategic and well-located greenfield area.

In addition, the assessment indicates that the proposal would provide employment for 266 or more full-time equivalent workers over five years totalling approximately \$114 million in wages and salaries, and \$191 million in GDP. Further, Insight Economics notes that these outcomes are concentrated in construction, civil works, and professional services, with flow-on effects across many industries, including manufacturing, logistics, and business services.

CRC do not disagree with this assessment nor question it and therefore have not had this assessment peer reviewed by an independent auditor.

Adverse Effects

CRC has not been provided with the applicant's technical assessments yet. Based on our expert's review of the information provided there are no significant concerns identified. Further information is recommended for several aspects. The experts' comments are included below:

1. Contaminated land

The applicant has provided a desktop assessment of potential contamination at the site – Preliminary Site Investigation (PSI).

The PSI indicates that a number of potential activities from the HAIL (hazardous activities and industries list) are present on the site. These are summarised in Section 11 of the PSI and marked on two plans included in Appendix E of the report. It is possible that soil is present on site that has contaminant concentrations above the appropriate environmental guidelines, the watercourse Knights Stream is also present adjacent to a portion of the eastern border of the site.

The next stage would be to undertake soil sampling/ an intrusive investigation in a Detailed Site Investigation (DSI) to characterise soil contaminant concentrations. This will delineate whether any soil is present on the site that does not meet the appropriate environmental guidelines. This will also help inform any appropriate consent conditions. If soil is present above the guidelines a remedial action plan/site management plan will need to be produced, remediation will need to take place, and a site validation report (SVR) and sampling to confirm remaining soil meets the guidelines prior to bulk earthworks taking place.

2. Land Ecology

There are areas of rank grass, a native plant corridor and conifer shelter belts that potentially provide lizard habitat. Lizard habitat appears to have not been considered in the application.

There is nothing to suggest the information in the report relating to terrestrial and wetland ecology is inaccurate.

3. Groundwater

The CRC Groundwater Scientist has looked at the groundwater aspects of the geotechnical report and the preliminary site investigation, and accepts the provided assessments of the soils, geology and depths to groundwater in the area. There are no groundwater drinking-water supplies that would be affected by the development, so the main groundwater receptor to be concerned about is Knights Stream and associated springs, drains and wetlands.

In regard to the paragraphs about stormwater design in the referral memo by B&A, dated 18 May 2026: The text describes stormwater draining to a first flush basin with a four-day detention time, then to a wetland before discharging to Knights Stream. Presumably, most of the water in the first flush basin would infiltrate into the ground and discharge to the stream via groundwater, which should help to remove entrained contaminants. Roof water may be discharged straight into the groundwater, which is probably fine. Again, travel through the groundwater should remove most contaminants, like zinc, before the water discharges to the stream.

4. Hazards

Broadly speaking, flood hazard at the site is expected to be low once stormwater design and earthworks design has been completed. CCC should be able to ensure that new builds have appropriate flood mitigation and that offsite effects can be assessed and avoided.

The applicant has understandably used CCC's flood model as a baseline for overland flow in the area. SDC's flood model also covers this area and shows significantly more overland flow.

It appears the CCC model includes less of the upper catchment. It's possible that there is further catchment modelled that CCC has chosen not to display, but it doesn't appear that way to the eye, the CRC Natural Hazards Scientist suspects the model is genuinely limited to the district boundaries.

Figures 1 and 2 show the different 200-year average occurrence interval flood extents.

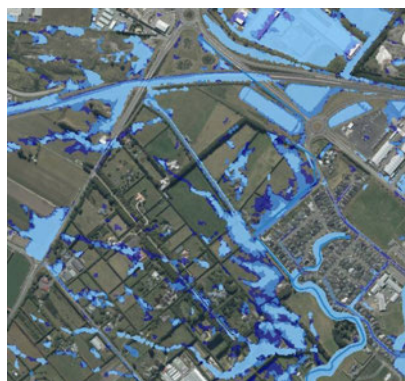


Figure 1. CCC flood modelling

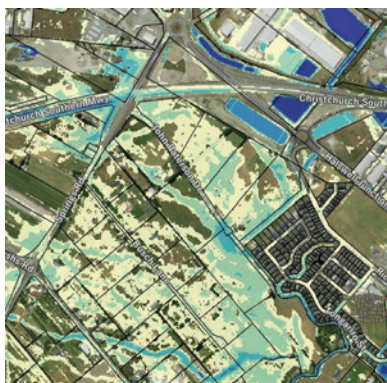


Figure 2. SDC flood modelling

The CRC Natural Hazards Scientist has reviewed the SDC model and found it very robust and defensible. They have not reviewed the CCC model, but their best guess is that it has gone through many peer reviews.

5. Land Resources

The LUC class of the soils present on the site have been correctly defined to 32 ha of class 1 and 5 ha of class 2 soils. These are both highly productive soils.

The consultant correctly identified the soils present on the site and suggested they are appropriate for arable and pastoral uses. Most of the soils have a high-profile available water capacity, which means they have a good water storage ability. Ideal for plant growth. The CRC Land Resources Scientist considers that the large water availability of this soil means that pasture/crops grown on the site, even without irrigation (as the consultant suggests this is not possible in this area), under average climatic conditions will have a much better yield potential than many shallow soils in Canterbury.

The consultant suggests that using the individual land titles separately, the scale of an agricultural operation is not feasible which the CRC Land Resources Scientist agrees with. However, the same could be said about a housing subdivision: Not feasible in an individual land title scale, but more economic at a 37-ha scale.

The scientist agrees there is a lot of potential contention around agricultural practices and built-up areas of housing. Nuisance dust, odour and noise are a likely issue. However, the presence of a rural landscape in an urban setting could also provide positive effects for those neighbouring the rural area.

The scientist agrees that an arable option for this land use would be difficult for practically moving large machinery into the area from further away for these tasks. It would be more viable for higher value seed crops.

The scientist agrees that a pastoral based land use would be most practical, but there are potential limitations for logistical issues of bringing in supplementary feed, transporting stock in and out, and likely wet soil conditions during the winter causing restrictions on stocking numbers. The consultant suggests irrigation is a limiting factor for pasture/forage crop growth. Yes, it can be but there are also many dryland farms that operate successfully in Canterbury.

The scientist does agree that if the land is turned into a residential area, then the primary production inputs of fertiliser and stock effluent will no longer be at risk of leaching to groundwater. Equally though, the addition of 500 households and the wastewater production from these should also be an environmental consideration.

The consultant considers that the described stock based primary production is not economically viable, and I agree that it would only be economic as part of a wider operation based elsewhere. An option the consultant did not consider (at least not presented) was market gardening or berry fruit/ fruit orchards. These do very well on smaller scales and with the benefit of close proximity to the city. Irrigation is likely required, but efficient drip irrigation could be an option to minimise water usage.

Once the land is turned into a residential area, reverting to primary production is highly unlikely. There is nothing that says specifically that there is a 'shortage' (of highly productive land) as such. There is a report 'Our Land' 2021 that describes the problem and highlights Canterbury had one of the worst fragmentation rates (2-8 ha size) between 2002 and 2019, page 19-21 of the document (Figure 1 further down this email). Once this land is converted, or fragmented, it is very difficult to get back to productive land again. Of note, nationally:

Between 1996 and 2018:

- Urban area expanded 14.6 percent (or 30,264 hectares).
- Just over 83 percent (25,248 hectares) of the landcover converted to urban area was from exotic grassland.
- Nearly 9 percent (2,602 hectares) of the landcover converted to urban area was from cropping/horticulture. This amounted to 30 percent of horticultural land converted during this period.
- Urban expansion continued year on year in all regions. The overall rate of urban expansion by hectares was highest in the Auckland region (7,259 hectares) followed by Canterbury (5,730), and then Waikato (4,845). (Note: this is total land not specifically HPL).

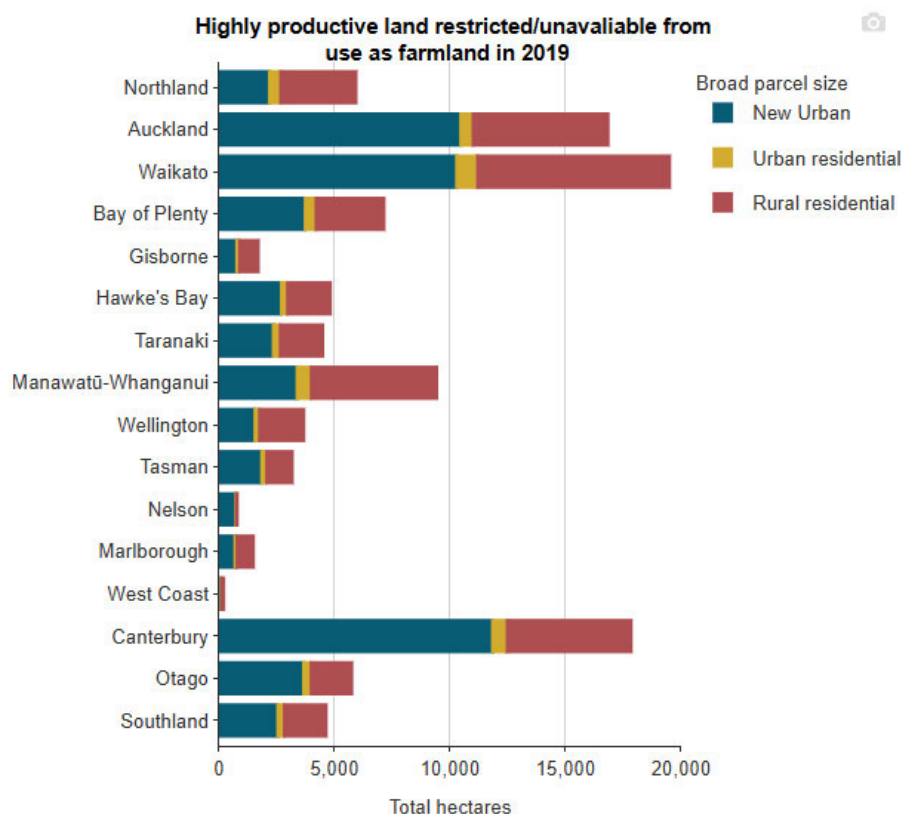


Figure 3. Land fragmentation between 2002-2019 (Source: Stats New Zealand).

There is mention in the Memorandum, dated 18 May 2026, that an ESCP will be used in the construction phase, but there is no further detail of this. Note: CRC anticipate that this will be provided with the substantive application.

6. Water Quality and Ecology

The proposal involves the discharge of stormwater to a first-flush basin and subsequently to a constructed wetland prior to discharge into Knights Stream. While this treatment train has the potential to reduce contaminant loads, no stormwater contaminant assessment has been provided to demonstrate the expected contaminant removal performance of the proposed system or the likely contaminant concentrations in the treated discharge entering Knights Stream. In particular, further information is required regarding the anticipated inflow and outflow concentrations of key stormwater contaminants (e.g., suspended sediment, nutrients, and trace metals) associated with the proposed wetland treatment system to assess the potential effects of the discharge on the receiving environment, including Knights Stream and, ultimately, the Halswell River.

It is also noted that Knights Stream forms part of the CCC stormwater catchment. However, it is currently unclear whether the applicant has obtained approval from CCC to discharge stormwater into Knights Stream under the existing CCC global stormwater consent. (Note: The Applicant would need to confirm this in the substantive application, if referred. If approval has already been obtained from CCC, then the CRC Surface Water Scientist does not consider a separate stormwater contaminant assessment to be necessary. In that case, they would have no further concerns regarding potential effects on surface water quality or ecology.

7. Flood Bylaw

The proposal doesn't trigger bylaw authority but CRC manages Knights Stream below Marshs/Quaifes Roads so there are potential impacts on the CRC scheme if stormwater is poorly managed.

Additionally, there doesn't seem to be any need/proposal for subsoil drainage.

APPENDIX 1. RELEVANT OBJECTIVES AND POLICIES

CRC consider the following objectives and policies to be relevant.

Canterbury Regional Policy Statement (CRPS)

Chapter 5 - Land-use and Infrastructure

5.2 OBJECTIVES
5.2.1 Location, Design and Function of Development (Entire Region)
Development is located and designed so that it functions in a way that: 1. achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth; and 2. enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which: a. maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values; b. provides sufficient housing choice to meet the region's housing needs; c. encourages sustainable economic development by enabling business activities in appropriate locations; d. minimises energy use and/or improves energy efficiency; e. enables rural activities that support the rural environment including primary production; f. is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure; g. avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure; h. facilitates the establishment of papakāinga and marae; and i. avoids conflicts between incompatible activities.
5.2.2 Integration of land-use and regionally significant infrastructure (Wider Region)
In relation to the integration of land use and regionally significant infrastructure:

1. To recognise the benefits of enabling people and communities to provide for their social, economic and cultural well-being and health and safety and to provide for infrastructure that is regionally significant to the extent that it promotes sustainable management in accordance with the RMA.
2. To achieve patterns and sequencing of land-use with regionally significant infrastructure in the wider region so that:
 - a. development does not result in adverse effects on the operation, use and development of regionally significant
 - b. adverse effects resulting from the development or operation of regionally significant infrastructure are avoided, remedied or mitigated as fully as practicable.
 - c. there is increased sustainability, efficiency and liveability.

5.3 POLICIES

5.3.7 Strategic land transport network and arterial roads (Entire Region)

In relation to strategic land transport network and arterial roads, the avoidance of development which:

1. adversely affects the safe efficient and effective functioning of this network and these roads, including the ability of this infrastructure to support freight and passenger transport services; and
2. in relation to the strategic land transport network and arterial roads, to avoid development which forecloses the opportunity for the development of this network and these roads to meet future strategic transport requirements.

Chapter 6 - Recovery and Rebuilding of Greater Christchurch

Relevant Objectives and Policies

6.2 OBJECTIVES

6.2.1 Recovery framework

Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:

1. identifies priority areas for urban development within Greater Christchurch;
2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design;
3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS;

4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;
5. protects and enhances indigenous biodiversity and public space;
6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;
7. maintains the character and amenity of rural areas and settlements;
8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;
9. integrates strategic and other infrastructure and services with land use development;
10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;
11. optimises use of existing infrastructure; and
12. provides for development opportunities on Māori Reserves in Greater Christchurch.

6.2.1a Housing Bottom Lines

For the period 2021-2051, at least sufficient development capacity for housing is enabled for the Greater Christchurch urban environment in accordance with the Housing Bottom Lines set out in Table 6.1.

6.2.2 Urban form and settlement pattern

The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by:

1. aiming to achieve the following targets for intensification as a proportion of overall growth through the period of recovery:
 - a. 35% averaged over the period between 2013 and 2016
 - b. 45% averaged over the period between 2016 to 2021
 - c. 55% averaged over the period between 2022 and 2028;
2. providing higher density living environments including mixed use developments and a greater range of housing types, particularly in and around the Central City, in and around Key Activity Centres, and larger neighbourhood centres, and in greenfield priority areas, Future Development Areas and brownfield sites;

3. reinforcing the role of the Christchurch central business district within the Greater Christchurch area as identified in the Christchurch Central Recovery Plan;
4. providing for the development of greenfield priority areas, and of land within Future Development Areas where the circumstances set out in Policy 6.3.12 are met, on the periphery of Christchurch's urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure;
5. encouraging sustainable and self-sufficient growth of the towns of Rangiora, Kaiapoi, Woodend, Lincoln, Rolleston and Prebbleton and consolidation of the existing settlement of West Melton;
6. Managing rural residential development outside of existing urban and priority areas; and
7. Providing for development opportunities on Māori Reserves.

6.2.3 Sustainability

Recovery and rebuilding is undertaken in Greater Christchurch that:

1. provides for quality living environments incorporating good urban design;
2. retains identified areas of special amenity and historic heritage value;
3. retains values of importance to Tāngata Whenua;
4. provides a range of densities and uses; and
5. is healthy, environmentally sustainable, functionally efficient, and prosperous.

6.2.4 Integration of transport infrastructure and land use

Prioritise the planning of transport infrastructure so that it maximises integration with the priority areas and new settlement patterns and facilitates the movement of people and goods and provision of services in Greater Christchurch, while:

1. managing network congestion;
2. reducing dependency on private motor vehicles;
3. reducing emission of contaminants to air and energy use;
4. promoting the use of active and public transport modes;
5. optimising use of existing capacity within the network; and
6. enhancing transport safety.

6.3 POLICIES

6.3.1 Development within the Greater Christchurch area

In relation to recovery and rebuilding for Greater Christchurch:

1. give effect to the urban form identified in Map A, which identifies the location and extent of urban development that will support recovery, rebuilding and planning for future growth and infrastructure delivery;
2. give effect to the urban form identified in Map A (page 6-27) by identifying the location and extent of the indicated Key Activity Centres;
3. enable development of existing urban areas and greenfield priority areas, including intensification in appropriate locations, where it supports the recovery of Greater Christchurch;
4. ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the CRPS;
5. provide for educational facilities in rural areas in limited circumstances where no other practicable options exist within an urban area;
6. provide for commercial film or video production activities in appropriate commercial, industrial and rural zones within the Christchurch District;
7. provide for a metropolitan recreation facility at 466-482 Yaldhurst Road; and
8. avoid development that adversely affects the function and viability of, or public investment in, the Central City and Key Activity Centres.

6.3.2 Development form and urban design

Business development, residential development (including rural residential development) and the establishment of public space is to give effect to the principles of good urban design below, and those of the NZ Urban Design Protocol 2005, to the extent appropriate to the context:

1. Tūrangawaewae – the sense of place and belonging – recognition and incorporation of the identity of the place, the context and the core elements that comprise the Through context and site analysis, the following elements should be used to reflect the appropriateness of the development to its location: landmarks and features, historic heritage, the character and quality of the existing built and natural environment, historic and cultural markers and local stories.
2. Integration – recognition of the need for well-integrated places, infrastructure, movement routes and networks, spaces, land uses and the natural and built environment. These elements should be overlaid to provide an appropriate form and pattern of use and development.

3. Connectivity – the provision of efficient and safe high quality, barrier free, multimodal connections within a development, to surrounding areas, and to local facilities and services, with emphasis at a local level placed on walking, cycling and public transport as more sustainable forms of
4. Safety – recognition and incorporation of Crime Prevention Through Environmental Design (CPTED) principles in the layout and design of developments, networks and spaces to ensure safe, comfortable and attractive places.
5. Choice and diversity – ensuring developments provide choice and diversity in their layout, built form, land use housing type and density, to adapt to the changing needs and circumstances of the population.
6. Environmentally sustainable design – ensuring that the process of design and development minimises water and resource use, restores ecosystems, safeguards mauri and maximises passive solar gain.
7. Creativity and innovation – supporting opportunities for exemplar approaches to infrastructure and urban form to lift the benchmark in the development of new urban areas in the Christchurch region.

6.3.3 Development in accordance with outline development plans

Development in greenfield priority areas or Future Development Areas and rural residential development is to occur in accordance with the provisions set out in an outline development plan or other rules for the area. Subdivision must not proceed ahead of the incorporation of an outline development plan in a district plan. Outline development plans and associated rules will:

1. Be prepared as:
 - a. a single plan for the whole of the priority area or Future Development Area; or
 - b. where an integrated plan adopted by the territorial authority exists for the whole of the priority area or Future Development Area and the outline development plan is consistent with the integrated plan, part of that integrated plan; or
 - c. a single plan for the whole of a rural residential area; and
2. Be prepared in accordance with the matters set out in Policy 6.3.2;
3. To the extent relevant show proposed land uses including:
 - a. Principal through roads, connections with surrounding road networks, relevant infrastructure services and areas for possible future development;
 - b. Land required for community facilities or schools;

- c. Parks and other land for recreation;
 - d. Land to be used for business activities;
 - e. The distribution of different residential densities, in accordance with Policy 6.3.7;
 - f. Land required for stormwater treatment, retention and drainage paths;
 - g. Land reserved or otherwise set aside from development for environmental, historic heritage, or landscape protection or enhancement;
 - h. Land reserved or otherwise set aside from development for any other reason, and the reasons for its protection from development;
 - i. Pedestrian walkways, cycleways and public transport routes both within and adjoining the area to be developed;
- 4. Demonstrate how Policy 6.3.7 will be achieved for residential areas within the area that is the subject of the outline development plan, including any staging;
 - 5. Identify significant cultural, natural or historic heritage features and values, and show how they are to be protected and/or enhanced;
 - 6. Document the infrastructure required, when it will be required and how it will be funded;
 - 7. Set out the staging and co-ordination of subdivision and development between landowners;
 - 8. Demonstrate how effective provision is made for a range of transport options including public transport options and integration between transport modes, including pedestrian, cycling, public transport, freight, and private motor vehicles;
 - 9. Show how other potential adverse effects on and/or from nearby existing or designated strategic infrastructure (including requirements for designations, or planned infrastructure) will be avoided, remedied or appropriately mitigated;
 - 10. Show how other potential adverse effects on the environment, including the protection and enhancement of surface and groundwater quality, are to be avoided, remedied or mitigated;
 - 11. Show how the adverse effects associated with natural hazards are to be avoided, remedied or mitigated as appropriate and in accordance with Chapter 11 and any relevant guidelines; and
 - 12. Include any other information that is relevant to an understanding of the development and its proposed zoning.

6.3.7 Residential location, yield and intensification

In relation to residential development opportunities in Greater Christchurch:

1. Subject to Policy 5.3.4, Policy 6.3.5, and Policy 6.3.12, residential greenfield development shall occur in accordance with Map A.
2. Intensification in urban areas of Greater Christchurch is to be focused around the Central City, Key Activity Centres and neighbourhood centres commensurate with their scale and function, core public transport routes, mixed-use areas, and on suitable brownfield land.
3. Intensification developments and development in greenfield priority areas shall achieve at least the following residential net densities averaged over the whole of an ODP area (except where subject to an existing operative ODP with specific density provisions):
 - a. 10 household units per hectare in greenfield areas in Selwyn and Waimakariri District;
 - b. 15 household units per hectare in greenfield areas in Christchurch City;
4. Intensification development within Christchurch City to achieve an average of:
 - a. 50 household units per hectare for intensification development within the Central City;
 - b. 30 household units per hectare for intensification development elsewhere.
5. Provision will be made in district plans for comprehensive development across multiple or amalgamated sites.
6. Housing affordability is to be addressed by providing sufficient intensification and greenfield land to meet housing demand, enabling brownfield development and providing for a range of lot sizes, densities and appropriate development controls that support more intensive developments such as mixed use developments, apartments, townhouses and terraced housing.

Canterbury Air Regional Plan

Relevant Objectives and Policies

5 Objectives	
5.1	Air quality protects the mauri and life supporting capacity of the environment.
5.2	Ambient air quality provides for the health and wellbeing of the people of Canterbury.
5.3	Competing demands for the use of the air resource of Canterbury are accommodated while unacceptable degradation of ambient air quality is avoided.
5.4	Degraded ambient air quality is improved over time and where ambient air quality is acceptable it is maintained.

5.5	Air quality is managed in a way that provides for the cultural values and traditions of Ngāi Tahu.
5.6	Amenity values of the receiving environment are maintained.
5.7	Discharges from new activities are appropriately located to take account of adjacent land uses and sensitive activities.
5.8	Discharges from existing activities are managed in response to evolving characteristics of the receiving environment.
5.9	Offensive and objectionable effects and noxious or dangerous effects on the environment are generally avoided.
5.10	Developments and innovation in technology that have the potential to improve air quality are enabled.
6 Policies	
Central policies applying to all activities	
6.1	Discharges of contaminants into air, either individually or in combination with other discharges, do not cause: a. diverse effects on human health and wellbeing; or b. adverse effects on the mauri and life supporting capacity of ecosystems, plants or animals; or c. significantly diminished visibility; or d. significant soiling or corrosion of structures or property.
6.2	Recognise the value of air quality as a taonga to Tangata Whenua and manage adverse effects of discharges into air on wāhi tapu, wāhi taonga, and places of significance to Ngāi Tahu.
6.3	Manage the effects of discharges into air on ambient air quality by: a. the spatial division of the Canterbury Region into areas inside and outside Clean Air Zones; b. setting a 2ha property area threshold; and c. setting thresholds for effects above which resource consents are required.
6.4	Reduce adverse effects of discharges on people where ambient air quality does not meet the value set in a national ambient air quality standard or guideline.

6.5 Minimise adverse effects on people where ambient air quality is degraded when assessed against a national ambient air quality standard or guideline.

6.6 Maintain ambient air quality in locations where the quality is acceptable when assessed against an ambient air quality standard set in a national ambient air quality standard or guideline.

6.7 In Clean Air Zones, reduce overall concentrations of PM_{2.5} so that by 2030 those concentrations do not exceed 25µg/m³ (24 hour average) and 10µg/m³ (annual average).

6.8 Offensive and objectionable effects are unacceptable and actively managed by plan provisions and the implementation of management plans.

6.9 Discharges into air from new activities are appropriately located and adequately separated from sensitive activities, taking into account land use anticipated by a proposed or operative district plan and the sensitivity of the receiving environment.

6.10 If the sensitivity of the receiving environment is altered by authorised land use change so that an existing discharge results in significant adverse effects on the receiving environment, require the effects of that discharge to be reduced and provide a reasonable timeframe for achieving that reduction.

6.11 When evaluating resource consent applications recognise locational constraints on activities, when imposing terms and conditions.

6.12 Where activities locate appropriately to mitigate adverse effects on air quality a longer consent duration may be available to provide on-going operational certainty.

6.13 Minimise the cumulative effects of discharges of contaminants into air by requiring:

- a. permitted discharges to apply good environmental practices; and
- b. discharges allowed by a resource consent to apply the best practicable option.

6.14 Recognise the contribution of nationally and regionally significant infrastructure to people's social and economic wellbeing and provide for discharges associated with the development, operation, and maintenance of that infrastructure.

6.15 Recognise that changes in technology may allow for improvements in the quality of a discharge over the term of the consent and acknowledge this by imposing management and review conditions on new and replacement resource consents.

6.16 Provide for discharges of contaminants into air necessary for the protection of production species and other biodiversity from biosecurity risks.

6.17 Where a discharge causes effects that are unpredictable because of scientific uncertainty or an absence of information adopt a precautionary approach to assessing the effects if there is a risk of high probability or high potential impact.

Canterbury Land and Water Regional Plan

Objectives and Policies

Relevant Objectives and Policies

Section 3 Objectives
3.1 Land and water are managed as integrated natural resources to recognise and enable Ngāi Tahu culture, traditions, customary uses and relationships with land and water.
3.2 Water management applies the ethic of ki uta ki tai – from the mountains to the sea – and land and water are managed as integrated natural resources recognising the connectivity between surface water and groundwater, and between fresh water, land and the coast.
3.3 Nationally and regionally significant infrastructure is enabled and is resilient and positively contributes to economic, cultural and social wellbeing through its efficient and effective operation, on-going maintenance, repair, development and upgrading.
3.5 Land uses continue to develop and change in response to socio-economic and community demand.
3.6 Water is recognised as essential to all life and is respected for its intrinsic values.
3.7 Fresh water is managed prudently as a shared resource with many in-stream and out-of-stream values.
3.8 The quality and quantity of water in fresh water bodies and their catchments is managed to safeguard the life-supporting capacity of ecosystems and ecosystem processes, including ensuring sufficient flow and quality of water to support the habitat and feeding, breeding, migratory and other behavioural requirements of indigenous species, nesting birds and, where appropriate, trout and salmon.
3.8A High quality fresh water is available to meet actual and reasonably foreseeable needs for community drinking water supplies.
3.9 Abstracted water is shown to be necessary and reasonable for its intended use and any water that is abstracted is used efficiently.
3.10 Water is available for sustainable abstraction or use to support social and economic activities and social and economic benefits are maximised by the efficient storage, distribution and use of the water made available within the allocation limits or management regimes which are set in this Plan.
3.11 Water is recognised as an enabler of the economic and social wellbeing of the region.
3.13 Groundwater resources remain a sustainable source of high quality water which is available for abstraction while supporting base flows or levels in surface water bodies, springs and wetlands and avoiding salt-water intrusion.

3.14	High naturalness waterbodies and hāpua and their margins are maintained in a healthy state or are improved where degraded.
3.15	Those parts of lakes and rivers that are valued by the community for recreation are suitable for contact recreation.
3.16	Freshwater bodies and their catchments are maintained in a healthy state, including through hydrological and geomorphic processes such as flushing and opening hāpua and river mouths, flushing algal and weed growth, and transporting sediment.
3.17	The significant indigenous biodiversity values of rivers, wetlands and hāpua are protected.
3.18	Wetlands that contribute to cultural and community values, biodiversity, water quality, mahinga kai, water cleansing and flood mitigation are maintained.
3.19	Natural character values of freshwater bodies, including braided rivers and their margins, wetlands, hāpua and coastal lagoons, are protected.
3.21	The diversion of water, erection, placement or failure of structures, the removal of gravel or other alteration of the bed of a lake or river or the removal of vegetation or natural defences against water does not exacerbate the risk of flooding or erosion of land or damage to structures.
3.22	The effectiveness of both man-made natural hazard protection infrastructure, and wetlands and hāpua as natural water retention areas, is maintained to reduce the risk of and effects from natural hazards, including those arising from seismic activity and climate change.
3.23	Soils are healthy and productive, and human-induced erosion and contamination are minimised.
3.24	All activities operate at good environmental practice or better to optimise efficient resource use and protect the region's fresh water resources from quality and quantity degradation.
Section 4 Policies	
Strategic Policies	
4.1	Lakes, rivers, wetlands and aquifers will meet the fresh water outcomes set in Sections 6 to 15 within the specified timeframes. If outcomes have not been established for a catchment, then each type of lake, river or aquifer should meet the outcomes set out in Table 1 by 2030.
4.2	The management of lakes, rivers, wetlands and aquifers will take account of the fresh water outcomes, water quantity limits and the individual and cumulative effects of land uses, discharges and abstractions will meet the water quality limits set in Sections 6 to 15 or Schedule 8 and the individual and cumulative effects of abstractions will meet the water quantity limits in Sections 6 to 15.
4.3	Surface water bodies are managed so that:

- (a) toxin producing cyanobacteria do not render rivers or lakes unsuitable for recreation or human and animal drinking-water;
- (b) fish are not rendered unsuitable for human consumption by contaminants;
- (c) the natural colour of the water in a river is not altered;
- (d) the natural frequency of hāpua, coastal lakes, lagoons and river openings is not altered;
- (e) the passage for migratory fish species is maintained unless restrictions are required to protect populations of native fish;
- (f) reaches of rivers are not induced to run dry, thereby maintaining the natural continuity of river flow from source to sea,
- (g) variability of flow, including floods and freshes, is maintained to avoid prolonged “flat-lining” of rivers; to facilitate fish passage; and to mobilise bed material; and
- (h) the exercise of customary uses and values is supported.

4.4 Groundwater is managed so that:

- (a) groundwater abstractions do not cause a continuing long-term decline in mean annual groundwater levels or artesian pressures;
- (b) the individual and cumulative rate, duration and volume of water pumped from bores is controlled so as to prevent seawater contamination;
- (c) the rate and duration of individual abstractions is controlled to ensure that individually or cumulatively, localised pressure reversal does not result in the downward movement of contaminants;
- (d) in any location where an overall upwards pressure gradient exists, restrict the taking of groundwater so that at all times the overall upward pressure difference is maintained between any one aquifer and the next overlying aquifer;
- (e) overall water quality in aquifers does not decline; and
- (f) the exercise of customary uses and values is supported.

Activity and Resource Policies

Discharges of Contaminants to land or water

4.12 There are no direct discharges to surface water bodies or groundwater of:

- (a) untreated sewage, wastewater (except as a result of extreme weather related overflows or system failures) or bio-solids;

- (b) solid or hazardous waste or solid animal waste;
- (c) animal effluent from an effluent storage facility or a stock holding area;
- (d) organic waste or leachate from storage of organic material; and
- (e) untreated industrial or trade waste.

4.13 For other discharges of contaminants into or onto land where it may enter water or to surface water bodies or groundwater (excluding those passive discharges to which Policy 4.26 applies), the effects of any discharge are minimised by the use of measures that:

- (a) first, avoid the production of the contaminant;
- (b) secondly, reuse, recovers or recycles the contaminant;
- (c) thirdly, minimise the volume or amount of the discharge; or
- (d) finally, wherever practical utilise land-based treatment, a wetland constructed to treat contaminants or a designed treatment system prior to discharge; and
- (e) in the case of surface water, results in a discharge that after reasonable mixing meets the receiving water standards in Schedule 5 or does not result in any further degradation in water quality in any receiving surface waterbody that does not meet the water quality standards in Schedule 5 or any applicable water conservation order.

4.14 Any discharge of a contaminant into or onto land where it may enter groundwater (excluding those passive discharges to which Policy 4.26 applies):

- (a) will not exceed the natural capacity of the soil to treat or remove the contaminant; and
- (b) will not exceed available water storage capacity of the soil; and
- (c) where meeting (a) and (b) is not practicable, the discharge will:
 - (i) meet any nutrient limits in Schedule 8 or Sections 6 to 15 of this Plan; and
 - (ii) utilise the best practicable option to ensure the size of any contaminant plume is as small as is reasonably practicable; and
 - (iia) ensure there is sufficient distance between the point of discharge, any other discharge and drinking-water supplies to allow for the natural decay or attenuation of pathogenic micro-organisms in the contaminant plume; and
 - (iii) not result in the accumulation of pathogens, or a persistent or toxic contaminant that would render the land unsuitable for agriculture, commercial, domestic, cultural or recreational use or water unsuitable as a source of potable water or for agriculture; and

- (iv) not raise groundwater levels so that land drainage is impeded.

4.14A The disposal of domestic effluent and wastewater shall be managed so as to avoid any adverse effect that is more than minimal on surface and ground waters. Where residential density exceeds 1.5 dwellings per hectare and the total population is greater than 1000 persons, community reticulated systems should be promoted. Alternatively, other measures should be promoted to reduce adverse effects on water bodies from effluent disposal systems, including secondary treatment systems and septic tank warrants of fitness.

4.14B Have regard to Ngāi Tahu values, and in particular those expressed within an iwi management plan, when considering applications for discharges which may adversely affect statutory acknowledgement areas, nohoanga sites, surface waterbodies, silent file areas, culturally significant sites, Heritage New Zealand sites, any listed archaeological sites, and cultural landscapes, identified in this Plan, any relevant district plan, or in any iwi management plan.

Stormwater and community wastewater systems

4.15 In urban areas, the adverse effects on water quality, aquatic ecosystems, existing uses and values of water and public health from the cumulative effects of sewage, wastewater, industrial or trade waste or stormwater discharges are avoided by:

- (a) all sewage, industrial or trade waste being discharged into a reticulated system, where available;
- (ab) all stormwater being discharged to land or into reticulated system, where a reticulated system is available;
- (b) all stormwater being discharged in accordance with a stormwater management plan, where one has been consented;
- (c) the implementation of contingency measures to minimise the risk of a discharge from a wastewater reticulation system to surface water in the event of a system failure or overloading of the system beyond its design capacity; and
- (d) any reticulated stormwater or wastewater system installed after 11 August 2012 is designed and managed to avoid sewage discharge into surface water.

4.16 Any reticulated stormwater system for any urban area is managed in accordance with a stormwater management plan that addresses the following matters:

- (a) the management of all discharges of stormwater into the stormwater system; and
- (b) or any reticulated stormwater system established after 11 August 2012, including any extension to any existing reticulated stormwater system, the discharge of stormwater being subject to a land-based or designed treatment system, or wetland treatment prior to any discharge to a lake or river; and

(c) how any discharge of stormwater, treated or untreated, into water or onto land where it may enter water meets or will meet, the water quality outcomes and standards and limits for that waterbody set out in Table 1, Schedules 5 and 8 and Sections 6 to 15, (whichever applies); and

(d) The management of the discharge of stormwater from sites involving the use, storage or disposal of hazardous substances, and

(d) Where the discharge is from an existing local authority network, demonstration of a commitment to progressively improve the quality of the discharge to meet condition (c) as soon as practicable but no later than 2025.

4.16A Operators of reticulated stormwater systems implement methods to manage the quantity and quality of all stormwater directed to and conveyed by the reticulated stormwater system, and from 1 January 2025 network operators account for and are responsible for the quality and quantity of all stormwater discharged from that reticulated stormwater system.

4.17 Stormwater run-off volumes and peak flows are managed so that they do not cause or exacerbate the risk of inundation, erosion or damage to property or infrastructure downstream or risks to human safety.

Earthworks, land excavation and deposition of material into land over aquifers

4.18 The loss or discharge of sediment or sediment-laden water and other contaminants to surface water from earthworks, including roading, works in the bed of a river or lake, land development or construction, is avoided, and if this is not achievable, the best practicable option is used to minimise the loss or discharge to water.

4.19 The discharge of contaminants to groundwater from earthworks, excavation, waste collection or disposal sites and contaminated land is avoided or minimised by ensuring that:

(a) activities are sited, designed and managed to avoid the contamination of groundwater;

(b) existing or closed landfills and contaminated land are managed and monitored where appropriate to minimise any contamination of groundwater; and

(c) there is sufficient thickness of undisturbed sediment in the confining layer over the Coastal Confined Aquifer System to prevent the entry of contaminants into the aquifer or an upward hydraulic gradient is present which would prevent aquifer contamination.

Soil stability

4.22 Sedimentation of water bodies as a result of land clearance, earthworks and cultivation is avoided or minimised by the adoption of control methods and technologies, such as maintaining continuous vegetation cover adjacent to water bodies, or capturing surface run-off to remove sediment and other contaminants or by methods such as direct drilling crops and cultivation that follows the contours of a paddock.

Site Dewatering

4.76 Localised land subsidence or other significant effects on the flows or levels of surface water or groundwater from the dewatering of construction sites or other sites, is avoided by limiting the rate or duration of pumping or other appropriate mitigation measures.

4.76A Adverse effects on surface water quality are minimised through limiting the concentration of sediment and other contaminants present in the dewatering water prior to its discharge to surface water.

Groundwater Protection

4.77 The use of bores or galleries, including decommissioned bores, does not result in the contamination of surface water or groundwater through backflow of water, or surface water and contaminants entering bores or galleries.

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	John Paterson Estates
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Christchurch City Council		
*First name	Paul		
*Last name	Lowe		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Please refer to the attached letter for our comments on this application.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

6 August 2026

Stephanie Frame
Manager – Fast-track Operations
Fast-track Applications
Environmental Protection Authority
info@fasttrack.govt.nz

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Christchurch 8154

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Fast-track Approvals Act 2024 – Christchurch City Council Comments on Referral Application

Application Number:	FTAA-2605-1235
Christchurch City Council Reference:	RMA/2026/2405
Project Name:	John Paterson Estates
Applicant:	John Paterson Estates Limited
Address:	John Paterson Drive (multiple addresses) and Marshs Road

1. The Christchurch City Council (CCC) have received an invitation to provide written comments on the referral application for 'John Paterson Estates' (FTAA-2604-2405) under section 17(1)(a) of the Fast-track Approvals Act 2024 (FTAA).
2. The purpose of this memorandum is to provide comments under section 17(3) of the FTAA.

Executive summary

3. There are significant concerns about the feasibility of the project due to the current infrastructure capacity constraints and the availability of funding to provide for additional network capacity required. Due to these matters, which have not been adequately addressed in the information provided, the project is not supported.
4. In relation to wastewater, there is not sufficient capacity to support additional greenfield development beyond that already anticipated by the District Plan, with recent modelling demonstrating that planned residential growth and urban intensification will fully utilise the available capacity over time. A new connection to the water supply network is also likely to require upgrades to existing water mains ahead of their planned renewal timeframe. As a result, the project has implications for the capacity and future planning of the wider supply network. The surrounding transport network is also subject to capacity constraints including at key intersections and additional Fast Track development proposals in the area are likely to generate cumulative transport effects.
5. The proposed development is not currently provided for within Council's infrastructure planning or funding programmes. Enabling unplanned, out-of-sequence growth places additional pressure on infrastructure and services and create significant funding challenges. The costs of providing infrastructure capacity to facilitate the development has not been adequately assessed, including costs which would fall on CCC ratepayers, and therefore the overall benefits of the project may be overstated.
6. The project is also considered to be inconsistent with the Greater Christchurch Spatial Plan, Canterbury Regional Policy Statement, and Christchurch District Plan, and is not required to address any shortfall in housing capacity. CCC has recently demonstrated that sufficient housing capacity over the short, medium and long-term has been provided for through the implementation of Plan Change 14. Furthermore, insufficient information has been submitted to demonstrate that the project is consistent with the National Policy Statement – Highly Productive Land.
7. It is recognised that other matters, including in relation to stormwater, urban design, geotechnical, earthworks, contamination, and noise, are considered to not be prohibitive of a future development in this location and can be addressed in further detail at any substantive application stage, if the referral application is successful.

8. Section 27(3)(b) provides an opportunity for the Minister to direct information be provided with a substantive application. If a decision to refer the project is made, I consider that specific information provided at substantive stage would assist those requested to comment and an expert comment, including:
- An infrastructure capacity assessment that considers the downstream network capacity, including the capacity of the Christchurch Wastewater Treatment Plant, and the capacity required to facilitate the urban growth that has been planned for through the District Plan.
 - An assessment of the upgrades required to facilitate the project, including water, wastewater network, wastewater treatment plant and roading. This will need to address how all necessary upgrades will be funded and align with CCC's maintenance, renewal, and upgrade programmes to ensure efficient provision of infrastructure in a manner that avoids re-work.
 - An economic assessment that considers the net benefits of the project, having regard to infrastructure costs and transfer effects, and provides quantification of the net benefits in regional terms.

Prior Council engagement

9. CCC Officers and representatives of the applicant have previously met to discuss potential development of the site and means through which this development could be facilitated.
10. CCC also provided a memorandum (dated 14th May 2026) to the applicant, providing comments under FTAA section 11(1)(c). This memorandum is included as Appendix 1 to this letter and should be read in conjunction with this response.

Scope of comments

11. Noting the timeframe for comments and high-level nature of comments sought, the information provided in this memorandum is of a general nature and not exhaustive.
12. Sections 17(3)(a) and 17(3)(b) provide the scope for Council to provide comments on a referral application.
13. Acknowledging the scope of the comments sought, specific attention has been turned to the matters specified by Ms Stephanie Frame, Manager – Fast-track Operations in the letter inviting comments dated 19 June 2026. These are as follows:
- *Identification of significant adverse effects that may be generated by the project.*
 - *If the project aligns with the District Plan, or any strategy or spatial planning document.*
 - *whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act)*
 - *whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of Act).*
14. Whilst some specialist comments from technical experts have been sought on the supporting information with the referral application, due to resourcing and timeframe constraints, not all supporting documents have been peer reviewed. It is noted that feedback provided is from specialists who are experienced in the coordination of greenfield subdivisions with comprehensive and detailed understandings of the necessary requirements for achieving well integrated, serviced, and designed urban environments.

Site and area context

15. The development area includes 9 properties, identified in Table 1 below.

Address	Legal description	Area (ha)
5 John Paterson Drive	Section 1 Survey Office Plan 560474	3.0488
6 John Paterson Drive	Section 10 Survey Office Plan 480694	3.8093
9 John Paterson Drive	Lot 2 DP 318764	3.9991
14 John Paterson Drive	Lot 7 DP 318764	4.324

15 John Paterson Drive	Lot 3 DP 318764	3.9971
19 John Paterson Drive	Lot 4 DP 318764	4.46
20 John Paterson Drive	Lot 6 DP 318764	4.4573
26 John Paterson Drive	Section 16 Survey Office Plan 480694	6.3947
479 Marshs Road	Lot 2 DP 81077	3.2232

Table 1 – Properties comprising subject site

16. All properties are predominantly zoned Rural Urban Fringe, with a small portion of 479 Marshs Road additionally zoned Open Space Water and Margins. A number of overlays are apparent on the site, including:

16.1. Liquefaction Management Area, affecting all properties;

16.2. Water Body Setback from a network waterway (Halswell Junction Outfall), affecting 19 John Paterson Drive, and an Upstream Waterway (Knights Stream), affecting 20 and 26 John Paterson Drive, and 479 Marshs Road.

16.3. Portions of 5, 6, and 19 John Paterson Drive are subject to a designation, P23, for which the New Zealand Transport Agency is the Requiring Authority.

17. The Site is adjacent to the Christchurch Southern Motorway/SH1.

Section 17(3)(a)

18. Section 17(3)(a) requires that the relevant local authorities are to provide comment advising on the following matters:

- *any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation*
- *in relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents of the kind referred to in section 30(3)(a) of the Act.*

19. There are no lodged applications for the application site that would be a competing application if a substantive application was made.

20. In relation to section 30(3)(a), this relates to Regional Council consents and therefore is not a relevant matter for this response.

Section 22(1)

21. Section 22(1)(a) considers the significant regional or national benefits of the proposal, and Section 22(1)(b) considers whether referring the project to the fast-track approvals process would facilitate the project in a more timely and cost-effective way than under normal processes and is unlikely to materially affect the efficient operation of the fast-track approvals process.

22. The economic assessment in support of the application concludes that the proposal will make a regionally significant contribution to housing supply, will deliver significant economic benefits, and that use of the FTAA process would materially accelerate the delivery of these benefits relative to traditional consenting pathways.

23. A peer review has not been undertaken or procured of the provided economic assessment and therefore no comment is offered on the overall significant regional or national benefits of the proposal. However, it is noted that the matter of infrastructure servicing and the associated cost of required upgrades has not been thoroughly addressed in the economic assessment provided. There are significant concerns about servicing constraints and the identified capacity of the network to facilitate this out-of-sequence greenfield subdivision, in addition to the cumulative effect of other proposed referral applications, which has been addressed further in this memorandum. This includes availability of funding to provide required off-site upgrades. In relation to the quantification of the proposed benefits, it does not appear that this cost has been appropriately addressed to provide a contextual analysis of the benefits of the proposal.

24. If the proposal was not referred to the Fast Track process, then the applicant would likely need to pursue a private plan change to rezone the site. Proceeding with the proposal under the Fast Track legislation may not be the most cost-effective way to proceed due to infrastructure related constraints and the potential funding implications of the required upgrades, whereas a plan change process would provide for a strategic approach that would allow for

suitable consideration of funding for servicing of planned development as well as a holistic approach to greenfield growth in the local area.

25. No comment is proffered in relation to whether the project would materially affect the efficient operation of the fast-track approvals process.

Section 22 (2)

26. Section 22(2) details matters which the Minister may consider when assessing a referral application. To assist the Minister in this assessment, comments in this memorandum have been provided having had regard to the relevant matters in Section 22(2).

Local and regional planning documents, including spatial strategies

27. As the site is zoned rural, it is not subject to wider spatial strategies seeking to coordinate and facilitate development over a wide area inclusive of multiple property owners. Included as Appendix 2 is a memorandum which provides strategic planning and policy advice on the consideration of greenfield Fast Track referrals having regard to the Greater Christchurch Spatial Plan¹ (GCSP) and the current Housing Capacity Assessment for Christchurch. That appendix should be read in conjunction with this memorandum. In summary, the proposal is not considered to be consistent with the GCSP given the ad-hoc and uncoordinated manner of development proposed, and which fails to appropriately consider the ability to provide and fund necessary infrastructure. Furthermore, Christchurch currently has sufficient development capacity to meet housing demand over the next 30 years, and therefore there is no immediate capacity shortfall that the proposal would be required to address. Furthermore, it is not considered that approval of this application would be effective in improving market competitiveness, given the significant current infrastructure capacity constraints.
28. The Canterbury Regional Policy Statement (CRPS) sets the resource management aspirations for the Canterbury Region, with Chapters **5** *Land-use and Infrastructure* and **6** *Recovery and rebuilding of Greater Christchurch* particularly relevant to land use and development. These chapters seek to enable land use and development in greenfield priority areas, as shown in Map A of Chapter 6, where well supported by infrastructure, including strategic connections. This is further reinforced by the following policies
- Policy 6.3.1 – Which seeks to ensure that new urban activities only occur within the existing urban area or areas identified in ‘Map A’;
 - Policy 6.3.3 – Which seeks to ensure that subdivisions must not proceed ahead of the incorporation of an outline development plan;
 - Policy 6.3.5 – That land use development is integrated with infrastructure by identifying priority areas and forward planning infrastructure in these areas; which the project site sits outside of.
29. The provisions of Chapter 6 of the CRPS largely seeks to ensure that sufficient housing capacity is provided within Greater Christchurch by identifying future development areas and greenfield priority areas and ensuring that development occurs within these areas. This allows for the expansion of Christchurch in a planned way with sufficient infrastructure to facilitate greenfield development. As the project is located entirely outside of the Map A areas, it is considered to be inconsistent with the provisions of the CRPS, and as noted above there is already sufficient development capacity to meet current and forecast housing needs.
30. Christchurch District Plan (CDP) strategic objectives, including 3.3.1 (Enabling recovery and facility the future enhancement of the district), 3.3.7 (Well-functioning urban environments) and 3.3.8 (Urban growth, form and design) broadly seek to enable development in an integrated manner. Notably, Objective 3.3.8 specifically provides for urban activities on greenfield land on the periphery of Christchurch’s urban area identified in accordance with the Greenfield Priority Areas in the Canterbury Regional Policy Statement Chapter 6, Map A. As noted above, the proposal is not an identified Greenfield Priority Area in the CRPS, and does not represent development occurring in an integrated manner given the absence of any strategic and coordinated approach to growth and supporting infrastructure.
31. Noting the rural zoning of the site, the objectives and policies of Chapter **17** *Rural* of the CDP are also relevant. Objective 17.2.1.1 (The rural environment) seeks that subdivision, use and development of rural land maintains a

¹ <https://www.greaterchristchurch.org.nz/assets/Documents/Work-Programme/Greater-Christchurch-Spatial-Plan/Greater-Christchurch-Spatial-Plan-2024.pdf>

contrast to the urban environment as well as supporting, maintaining and, where appropriate, enhancing the function, character and amenity values of the rural environment. Policy 17.2.2.7 (Density and distribution of residential units) seeks to manage residential development, including the consideration of lot sizes and the expectation of land use change of rural land to urban activities. The proposal is considered to be inconsistent with these provisions, as a development that does not maintain a contrast to the urban environment, and which provides for a density of residential units that is not in accordance with the anticipated outcomes for the zone.

32. Overall, the proposal is not considered to be consistent with the Greater Christchurch Spatial Plan, Canterbury Regional Policy Statement, or the Christchurch District Plan.

National Policy Statement for Highly Productive Land

33. The proposal site is zoned as Rural Urban Fringe. For the purpose of the National Policy Statement for Highly Productive Land (NPS-HPL) transitional definition of 'highly productive land', CCC consider the Rural Urban Fringe Zone is the nearest equivalent zone to the General Rural Zone in the National Planning Standards. As the land is identified as Land Use Capability (LUC) 1 and 2, the NPS-HPL is a relevant consideration. The application includes an assessment of the proposal against the NPS-HPL by The AgriBusiness Group. Specifically, this assessment notes that the application site is predominantly categorised as LUC1 and some LUC2, and considers that the exemption pathway under clause 3.10 of the NPS-HL is relevant.

34. A peer review of the report by The AgriBusiness Group has not been undertaken or procured, but if the application is referred and a substantive application is made, a review will be undertaken. However, it appears that there are deficiencies in the assessment which render determination of compliance with clause 3.10 of the NPS-HPL unclear. These include the following non-exhaustive matters:

34.1. The assessment considers the scale of the site as a constraint, when subclause 4 of 3.10 specifically states that the size of a landholding is not of itself a determinant of a permanent or long-term constraint. The assessment appears to have assessed each individual title and determined their size is a constraint, rather than the entire application site as a whole.

34.2. In relation to constraints on irrigation capacity, CCC considers this requires further consideration, as it is understood that there is in fact the ability to apply for a consent for a transfer of water rights to the site from Regional Council and therefore water availability is likely to not be at the level of a permanent, long-term constraint on the site.

34.3. The assessment does not sufficiently address the ability for any identified constraint to be addressed through any reasonably practicable options, including consideration of alternate forms of land-based primary production, alternative production strategies, reallocation or transfer of water, and boundary adjustments.

35. For the reasons set out above, the proposal may not be consistent with the NPS-HPL.

Water servicing

36. Comments on water servicing were provided in the memorandum at pre-lodgement stage. The applicant has provided an infrastructure report and concept servicing plans addressing connections to and potential upgrades required for the provision of water supply to the site, which have been reviewed by Ms Michele McDonald, Team Leader Asset Planning Water and Wastewater. Ms McDonald provides the following comments:

36.1. Christchurch operates a decentralised groundwater-based water supply system. To achieve cost-effective compliance with the Drinking Water Quality Assurance Rules, Christchurch City Council seeks to minimise the need for additional pump stations and treatment plants, while working within the constraints of the existing piped network.

36.2. The proposed John Paterson Development is adjacent to the West Water Supply Zone (WSZ). The nearest pump station and treatment plant is PS1117 Wilmers WS.

36.3. The Three Waters Unit has assessed the capacity of the city's water supply against 50-year growth projections and identified a need for additional supply capacity in the West WSZ. Capacity increases at existing pump station and treatment sites within the West WSZ can be achieved by adding new groundwater wells. Accordingly, Three Waters proposes to increase source capacity at the Wilmers pump station and treatment facility as part of the next Long-Term Plan.

- 36.4. A new connection to the existing water supply network will require careful planning and likely involve upgrades to existing water mains ahead of their planned renewal schedule.

Wastewater

37. Ms McDonald has also previously provided comments on wastewater servicing for the development, in which she identified constraints regarding the servicing of the site and noted that off-site upgrades would be required. The applicant has addressed potential wastewater servicing in their infrastructure report. Notably, they have included a memo from CCC, dated 7th August 2024. This memo addressed the capacity of wastewater pumping station identified PS 115. The capacity assessment included consideration of future development and future upgrades to the pump station (but not the downstream network) that may be required. This included consideration of residential development at the application site, but did not include consideration of development enabled by CCC intensification plan change (PC14). Subsequently, CCC have completed a comprehensive city-wide wastewater system optimisation assessment which represents the most up to date information in relation to the current capacity of the wastewater network and the constraints on future development not currently enabled.
38. Ms McDonald notes that the comprehensive city-wide wastewater system optimisation completed in June 2026 confirms that the Christchurch Wastewater Treatment Plant (CWTP), along with the trunk sewer network and terminal pump stations that convey wastewater to the plant, does not have sufficient capacity to support additional greenfield development beyond what is already included in the District Plan. Ms McDonald does not support the proposal due to these identified capacity constraints.
39. With regard to local wastewater infrastructure capacity, the Council memorandum accompanying the application identifies that the downstream PS115 Longhurst Pump Station does not have sufficient capacity to service the proposed development in its current configuration. Capacity constraints can be addressed through a pump station upgrade. In addition, the development will also require an upgrade to Lift Station LS2622, located opposite 54 Whincops Road, to ensure adequate network performance. Ms McDonald notes the preference would be for a gravity sewer system over a low pressure sewer system due to less impacts on operation and maintenance costs and renewal budgets.
40. Overall, whilst it is anticipated that the local wastewater capacity constraints associated with this proposal can be addressed through infrastructure upgrades, the broader issue is that projected growth from District Plan Residential New Neighbourhood areas, together with urban intensification anticipated, is expected to fully utilise the available downstream wastewater system capacity over time. Although these capacity constraints are not yet evident under current demand conditions, hydraulic modelling and network optimisation based on long-term growth forecasts clearly identify a significant future capacity shortfall. In this context, enabling additional greenfield growth would place further pressure on infrastructure capacity that is already forecast to be fully committed to planned growth areas and intensification.

Stormwater

41. With regard to stormwater Brian Norton, Senior Stormwater Planning Engineer at the Council, has reviewed the application and provided the following comments:
- 41.1. The applicant is assuming that part of the site will be able to dispose of stormwater into land (25% of the site, or 8.75ha) and they have excluded this area from the overall catchment sizing of the collective Stormwater Management Area (SMA) adjacent to Knights Stream. The Geotech report doesn't really support the feasibility of this assumption, as most of the auger holes reveal silts with some sands, and very little evidence of free draining gravels at any of the depths measured. Groundwater appears to be deep in these areas (3m+) however more evidence would be required to support large scale stormwater disposal to land.
- 41.2. Further, disposal of runoff from roads and hardstand areas first requires treatment, and the applicant has not indicated how this 8.75ha of development will be treating the first flush of its stormwater. We would typically expect a collective soil adsorption basin to be used for treatment in soakage areas, however the applicant is not indicating a second facility in the upper portion of the site. The other option would be for individual sites to discharge roof water only into land, however all hardstand runoff would then need to be discharged to the combined SMA downstream. With any substantive application, the following information would be needed:
- Supply additional geotechnical evidence that stormwater discharge into land is feasible; and
 - Clarify how first flush treatment of hardstand areas will be provided for those sub-catchments discharging into land, or whether this will be individual site roof water only; and

- Updated calculations for SMA sizing, or new concept and calculations for a second soakage SMA accordingly.

- 41.3. In areas where stormwater will not be disposed of into land, Council's expectations for stormwater mitigation will be a first flush (dry) basin followed by a stormwater wetland with a separate detention basin to achieve Full Flood Attenuation for a 2% AEP (1 in 50-year ARI), 60-hour storm (the critical duration for Halswell River). Full flood attenuation is capture of the full 2% AEP (1 in 50-year ARI), 60-hour storm with slow release over 96 hours. Their methodology for the storage calculation compares pre- to post-development flows (sometimes called "Extra-over attenuation, or "hydraulic neutrality"). This is not accepted for Halswell catchment as it could affect Council's ability to meet its global consent requirements for flood compliance. The applicant should recalculate the storage requirements using Full Flood Attenuation. I agree with the proposed location for the SMA (the lowest part of the site), adjacent to Knights Stream and contiguous with Council's Knights Stream Wetland.
- 41.4. In the interest of achieving collective, integrated stormwater management, I believe the SMA for this development could be combined efficiently with a future SMA for development of the blocks surrounding Busch Lane, should this become a future growth area as well. I also consider that 333 Springs Road needs to be catered for in the stormwater design, even if that block is not part of the application. This site naturally drains southeast into the application site along historic flood channels. This will encourage residential development of this 11,628m² area, without the added cost and inefficiency of additional stormwater design.
- 41.5. The site contains predicted flood ponding areas, including some areas impacted by more frequent 10% AEP ("1 in 10" year ARI) flood events. It is likely that the origin of this flood water is primarily the site itself, and that filling and shaping of the site, coupled with provision of new stormwater networks and overland flow paths will simply direct this flood water into the SMA where it can be managed. However, there are low lying properties outside of the site that share these natural ponding areas and could potentially be affected, either by displacement of ponded flood water or by obstruction of overland flow. While I consider the development will likely be able to mitigate these effects, I recommend that the applicant test their development in Council's Halswell River Hydraulic model to understand any effects of earthworks on these other low-lying properties.
- 41.6. Additionally, the model indicates potential flooding related to the overflow channel fed by Halswell Junction Road and the NZTA basins. This prediction is reinforced by a number of historic flooding complaints from properties in this area of John Patterson Drive. The existing drain here is very steep sided, and does not appear to have sufficient conveyance capacity. I recommend that this drain be widened to provide 2% AEP conveyance and its batters flattened to improve stability/maintainability, and that access from individual lots and connecting roads across this watercourse be restricted, to avoid a proliferation of culvert crossings that could increase the chance of blockage.
- 41.7. The proposed design water levels in the wetland are lower than the predicted 2% AEP (1 in 50-year ARI) peak water levels in Knights Stream (RL 16.82m NZVD at the outlet point). During a rainfall event of this size, there is a risk that the Knights Stream backflows into the basin, affecting the function of the wetland or reducing its storage capacity. I recommend matching the Max WL in the wetland to match the 2% AEP predicted water level in Knight Stream. This may have the effect of requiring the key levels of the other basins to be lifted and may have filling consequences for the rest of the development.
- 41.8. Further to above, 0.5% AEP (200-year) predicted flood levels in the lowest part of the site are around RL 17.90m, which would put finished floor levels of dwellings at about 18.30m (400mm freeboard is required). The lowest part of internal roads are shown at RL.17.5m, which is 800mm below the nearest adjacent finished floor levels required. It is recommended that more filling occur to bring the site to a level that can achieve finished floor levels of around RL.18.3, and that roads be sufficiently raised to allow emergency ingress/egress in this extreme flood event.
- 41.9. The PSI identified two areas of contamination risk in the proposed SMA area. These will require remediation below ANZECC SQG-High Sediment Quality guidelines prior to vesting.

Transport

42. Initial transport comments were provided at the pre-lodgement stage, highlighting the existing operational constraints and limited remaining capacity of the surrounding transport network infrastructure, and the need for careful transport planning to provide for the necessary transport infrastructure to support a development on this scale. The transport assessment by Abley and additional information provided with this application have been reviewed by Mr David McCormick, Councils Transport Network Planner. Mr McCormick provides the following comments:

- 42.1. The assessment of traffic effects of the fast track should be undertaken in a comprehensive, area wide basis to assist in identifying the full demands and potential need for planned upgrades of the transport infrastructure. There is also a need to apportion the costs of any infrastructure upgrades to such growth projects. Council is also aware of further interest in multiple fast track applications for rezoning nearby rural land for residential purposes to the alongside Sabys Road and also further fast track applications within CCC and Selwyn District which will further impact the network. For the enabling of planning of infrastructure required to support growth it is suggested that any subsequent further assessment of effects captures the cumulative effect of consented development plus future development that is reasonably anticipated.
- 42.2. While the information provided demonstrates how the site, through the extension of an existing bus route, can be made accessible by public transport, initial comments on this subject with regards to the uncertainty of existing services which are low priority services within ECan service network remain relevant. Public Transport accessibility and passenger infrastructure should be addressed as a key early component of any substantive fast-track proposal. As there is no proposed commercial / retail areas within the proposed area, this further increases the need for Public Transport to be available for the subdivision.
- 42.3. In relation to modelling of the wider network, original comments regarding the wider network constraints to remain. No investigation regarding the Springs Road and Halswell Junction roundabout was provided in the high-level assessment, noted it is mentioned that it will be investigated as part of the next stage of the of a substantive application. It would be expected as part of the substantive application, that the investigation of the Network Effects are not assessed in isolation but consideration is had with existing activities, consented but not yet implemented activities and other reasonably foreseeable future activities as discussed in the general comments above. Council is aware of a Fast Track referral for Springs Road industrial area which deems the intersection of Springs Road and Halswell Junction Road is already experiencing capacity constraints. Mr McCormick concurs with Abley's findings that the majority of development traffic is expected to travel north via Richmond Avenue to Halswell Junction Road, aim to access the Christchurch Southern Motorway and the wider transport network. Therefore, the operational performance of the Halswell Junction Road motorway ramp roundabout should be part of the relevant transport assessment
- 42.4. Mr McCormick supports the proposed approach of undertaking a more comprehensive assessment using the Christchurch Assignment Simulation Transport Model (CAST) to determine trip distribution, route choice behaviour, and wider network effects, supported by detailed SIDRA modelling to assess the operational performance and interaction between the key intersections with robust localised validation.
- 42.5. Reference has been made to the use of Christchurch Transport Model (CTM) as a method to determine traffic distribution and wider effects on the transport network. As owners of both the CTM and CAST models the Greater Christchurch partners including Selwyn District Council, New Zealand Transport Agency, ECan and CCC will expect the use of CAST as an appropriate step for inputs to the more localised intersection SIDRA model.
- 42.6. Based on the current planning framework, a residential yield of 18–20 lots per hectare should be adopted for modelling purposes. A peak-hour trip generation rate of 0.9 per dwelling is commonly accepted for greenfield residential developments and is considered more appropriate for this assessment and is used for other residential plan change applications.
- 42.7. Infrastructure report information has been provided regarding the fast track, but the information provided regarding the access and road hierarchy do not align with the Infrastructure Design Standards and should be investigated to ensure alignment with both the District Plan and Infrastructure Design Standard. We advise that all infrastructure to be provided shall be subject to Council's engineering approvals process and as a default position comply with District Plan and Infrastructure Design standards.

Funding for servicing

43. As detailed above, servicing of the proposed development represents a substantial challenge given identified network constraints. Out of sequence development undermines the strategic and phased approach to planning and creates inefficiencies in infrastructure delivery by diverting funding from planned development. This matter has been further addressed in the memo included as Appendix 2 to this letter, and which should be read in conjunction with this response.

Urban Design and open space

44. Comments on urban design matters were provided in the memorandum to the applicant provided at pre-lodgement stage. The applicant has provided an urban design assessment with the referral application, which has been reviewed by Council Senior Urban Designer, Mr David Hattam. Mr Hattam provides the following comments in addition to the comments provided at the pre-lodgement stage:
- 44.1. A collector road is needed to provide for future access to the wider area, all the way to the urban boundary and beyond to Prebbleton. This will provide for bus access and serve future residents of this development as well as the wider area. For instance, a neighbourhood centre may be required at some point.
- 44.2. Additional walking connections to the stormwater reserve and to the established residential area would be beneficial and support walkability within the development.
- 44.3. Proposed carriageway widths of 11m may not be appropriate, and 8m carriageway widths may be more appropriate.
45. It is also noted that whilst the recommendation by Peter Barnes, Senior Park and Policy Planner, was made at the pre-lodgement stage that an additional 3000m² reserve would likely be required to adequately provide recreation opportunities for the surrounding residential area, the applicant has not addressed this matter.

Geotechnical and earthworks

46. Ms Yvonne McDonald, Council Senior Subdivisions Engineer, has reviewed the supporting geotechnical report and earthwork details. In relation to earthworks, Ms McDonald has not identified any issues.
47. In relation to geotechnical matters, Ms McDonald notes that LandTech located four wells in Canterbury Maps and undertook seven hand augers and six CPT tests. Ms McDonald notes that these investigations are minimal and more site investigations will be needed if any substantive application is made. Ms McDonald also notes that LandTech consider the site is largely TC1 equivalent with areas of TC2 and they have not considered lateral spread. Ms McDonald agrees with LandTech that further investigation is necessary to define categorisation areas more clearly and to refine the lateral spread risk.
48. Ms McDonald also agrees with the assessment of LandTech in relation to the National Policy Statement on Natural Hazards acknowledging that further investigation will be required before consenting the subdivision. Ms McDonald also notes that no Statement of Professional Opinion has been provided by the applicant, but would be required with any substantive application if made.

Contamination

49. The supporting Preliminary Site Investigation has been reviewed by Ms Kirsten Rayne, Council Senior Environmental Health Officer. A Detailed Site Investigation is anticipated with any substantive application, but Ms Rayne considers contamination can be appropriately managed in any future development.

Acoustic

50. The Acoustic Memo by Powell Fenwick has also been reviewed by Ms Rayne. The CDP contains rules on noise levels to be achieved for sensitive activities, including residential development, to provide an appropriate level of residential amenity, as well as consideration of reverse sensitivity effects. Noting the proximity of State Highway 76 to the proposed development, these matters are relevant and could lead to adverse effects. Ms Rayne has provided the following comments:
- 50.1. Lots should be set back from the boundary with State Highway 76 to ensure that north facing outdoor living areas are not exposed to more than 55dB LAeq (16 hours) to maintain amenity and avoid serious annoyance (noise above this level would constitute a more than minor adverse effect, in my opinion).
- 50.2. In at least one subdivision located nearby, outdoor living areas have had to be oriented to the south for this reason.
- 50.3. Whilst the developments on Sholto Duncan Crescent and Bronco Drive are set back a comparable distance with similar height screening, they do not maintain a direct line of sight to an additional arterial road (the Springs Road overbridge).

50.4. Increasing the height of the existing bund or constructing a fence on top of the existing bund is also not expected to be desirable from an amenity perspective.

51. Whilst it is anticipated that this matter can be sufficiently addressed to manage effects, if appropriate mitigation for noise effects is not provided then there is the potential for adverse effects on future residents and potential reverse sensitivity effects on the operation of the State Highway. Consideration should be given to how outdoor living spaces continue to provide for an appropriate level of amenity, including access to sunlight, when oriented in a manner to achieve the required acoustic levels.

Waterbodies

52. The CDP includes provisions for waterbody setbacks, which are relevant for the application site noting the presence of Knights Stream, classified as an Upstream Waterway. These provisions seek to protect and enhance the values and functions of water bodies, and require development to be suitably setback from the edge of water bodies. The supporting ecology report by Aquatic Ecology has been reviewed by Council Waterways Ecologist Mr Christopher Watt, who confirms preliminary support based on the concept-level waterways enhancement information provided to date. However, detailed design, management plans, planting schedules, hydraulic assessments, and proposed consent conditions will inform comment on potential effects at the substantive application stage, if the application is referred.

Significant adverse effects

53. CCC have been requested to provide specific comment on whether there are any significant adverse effects of the proposal.
54. The primary risk of adverse effects relates to the necessary servicing of the site, given the significant constraints of infrastructure to service existing enabled residential development within Christchurch in addition to out of sequence greenfield developments. As has been highlighted in this response, the existing capacity constraints and the absence of any appropriate solution to provide for funding to address this is likely to present significant challenges in accommodating the proposed development.
55. In addition to the above, other significant adverse effects may arise from noise relating to the adjacent state highway, although this is anticipated to be able to be mitigated to an appropriate level.

Ineligible activities under Schedule 5

56. The proposal does not appear to include an ineligible activity as per Schedule 5.

Owen Jeffreys

Planner Level 3



Paul Lowe
Manager Resource Consents

Appendix 1 – CCC Pre-lodgement comments

14 May 2026

John Paterson Estate Limited
c/- Kerstin Ghisel
Barker and Associates
Level 3, 61 Cambridge Terrace
Christchurch Central
Christchurch 8013

03 941 8999
53 Hereford Street
Christchurch 8013
PO Box 73013
Christchurch 8154
ccc.govt.nz

By email: s 9(2)(a)

Fast-track Approvals Act 2024 – Notification of Intent to Lodge Referral Application

John Paterson Estate Limited – John Paterson Estates Development

1. The Christchurch City Council (CCC) received a notification from John Paterson Estate Limited advising of their intention to lodge a referral application under section 13 of the Fast-track Approvals Act 2024 (FTAA) to subdivide and use land for residential development, dated 16 April 2026.
2. The purpose of this memorandum is to respond to this notification under FTAA section 11(1)(c).

Prior Council engagement

3. CCC Officers and representatives of the applicant have previously met to discuss potential development of the site and means through which this development could be facilitated, however no detailed proposal has previously been circulated to the CCC for comment.

Information provided

4. The information provided with the notification is attached as Appendix 1, being:
 - 4.1. A description of the proposal;
 - 4.2. A draft scheme plan.
5. For clarity, it is noted that the following have not been provided:
 - 5.1. Any information detailing the national or regional benefits anticipated;
 - 5.2. Any information detailing how the project would be facilitated by a referral to the fast-track approvals process;
 - 5.3. The number and nature of approvals required and sought under the Resource Management Act 1991;
 - 5.4. The anticipated commencement and completion dates of work;
 - 5.5. Whether the project is proposed to be staged;
 - 5.6. Any anticipated and known adverse effects of the proposal;
 - 5.7. Any concept stage plans for infrastructure necessary to service the development.

Scope of comments

6. Noting the level of detail provided with the application, the scope of comments provided in the memorandum is of a general nature and not exhaustive.

7. In particular, it is considered that insufficient information has been provided to enable comment in relation to:
 - 7.1. Earthworks;
 - 7.2. Geotechnical matters;
 - 7.3. Infrastructure design within the subdivision area;
 - 7.4. Natural hazards;
 - 7.5. Natural heritage, indigenous biodiversity and ecosystems;
 - 7.6. Use of Highly Productive Land;
 - 7.7. Waterway values.
8. Information to assess and consider these matters is anticipated to be provided at substantive stage, should the application for referral be accepted.

Site and area context

9. The development area includes 9 properties, identified in Table 1 below.

Address	Legal description	Area (ha)
5 John Paterson Drive	Section 1 Survey Office Plan 560474	3.0488
6 John Paterson Drive	Section 10 Survey Office Plan 480694	3.8093
9 John Paterson Drive	Lot 2 DP 318764	3.9991
14 John Paterson Drive	Lot 7 DP 318764	4.324
15 John Paterson Drive	Lot 3 DP 318764	3.9971
19 John Paterson Drive	Lot 4 DP 318764	4.46
20 John Paterson Drive	Lot 6 DP 318764	4.4573
26 John Paterson Drive	Section 16 Survey Office Plan 480694	6.3947
479 Marshs Road	Lot 2 DP 81077	3.2232

Table 1 – Properties comprising subject site

10. All properties are predominantly zoned Rural Urban Fringe, with a small portion of 479 Marshs Road additionally zoned Open Space Water and Margins. A number of overlays are apparent on the site, including:
 - 10.1. Liquefaction Management Area, affecting all properties;
 - 10.2. Water Body Setback from a network waterway (Halswell Junction Outfall), affecting 19 John Paterson Drive, and an Upstream Waterway (Knights Stream), affecting 20 and 26 John Paterson Drive, and 479 Marshs Road.
 - 10.3. Portions of 5, 6, and 19 John Paterson Drive are subject to a designation, P23, for which the New Zealand Transport Agency is the Requiring Authority.
11. The Site is adjacent to the Christchurch Southern Motorway/SH1.

Local and regional planning documents, including spatial strategies

12. As the site is zoned rural, it is not subject to wider spatial strategies seeking to coordinate and facilitate development over a wide area inclusive of multiple property owners.
13. Progressing development on greenfield land that is not subject to area planning risks disjointed development, small and inefficient facilities, and potential for rework required to upgrade undersized infrastructure in future. Such development would be inconsistent with Christchurch District Plan (CDP) Strategic Objectives 3.3.1 *Enabling recovery and facility the future enhancement of the district* and 3.3.8 *Urban growth, form and design*, which broadly seek to enable development in an integrated manner.
14. These provisions are consistent with other local and regional planning documents, in particular:

- 14.1. The Canterbury Regional Policy Statement (CRPS), which sets the resource management aspirations for the Canterbury Region, with Chapters 5 *Land-use and Infrastructure* and 6 *Recovery and rebuilding of Greater Christchurch* particularly relevant to land use and development. These chapters seek to enable land use and development in greenfield priority areas, as shown in Map A of Chapter 6, where well supported by infrastructure, including strategic connections.
 - 14.2. The Greater Christchurch Spatial Plan¹ (GCSP), which has been adopted by CCC and SDC as the Future Development Strategy under the National Policy Statement on Urban Development 2020, to inform the broad locations in which development is anticipated to inform requirements for development and other infrastructure, and transport corridors. The GCSP identifies areas in which greenfield development is anticipated, as shown in Map 14. The GCSP acknowledges additional greenfield development may be required outside priority areas where a Housing and Business Capacity Assessment identifies a need for development, and the development is well integrated with existing urban areas.
15. The applicant should demonstrate the extent to which the development is consistent with the relevant provisions of these documents when the referral application is lodged.

Infrastructure and servicing constraints

Water supply

16. With regard to the availability of connections to and potential upgrades required for the provision of water supply to the site, Michelle McDonald, Team Leader Asset Planning Water and Wastewater, has noted:
- 16.1. Christchurch operates a decentralised groundwater-based water supply system. To achieve cost-effective compliance with the Drinking Water Quality Assurance Rules, Christchurch City Council seeks to minimise the need for additional pump stations and treatment plants, while working within the constraints of the existing piped network.
 - 16.2. The proposed John Paterson Development is adjacent to the West Water Supply Zone (WSZ). The nearest pump station and treatment plant is PS1117 Wilmers WS.
 - 16.3. The Three Waters Unit has assessed the capacity of the city's water supply against 50-year growth projections and identified a need for additional supply capacity in the West WSZ. Capacity increases at existing pump station and treatment sites within the West WSZ can be achieved by adding new groundwater wells. Accordingly, Three Waters proposes to increase source capacity at the Wilmers pump station and treatment facility as part of the next Long-Term Plan.
 - 16.4. A new connection to the existing water supply network will require careful planning and likely involve upgrades to existing water mains ahead of their planned renewal schedule.

Wastewater

17. With regard to the availability of connections to and potential upgrades required for the management of wastewater from the site Ms McDonald has noted:
- 17.1. Christchurch city operates a central wastewater network with wastewater conveyed through a series of pump stations and trunk sewers to the central Christchurch Wastewater Treatment Plant located at Bromley on the eastern edge of the city.
 - 17.2. The Three Waters Unit has commenced a review of the city-wide wastewater master plan in response to updated growth projections that the city could grow by 67,000 residential units over a 50-year planning horizon to support a population of approximately 550,000. Most of the projected growth is expected to be accommodated through urban intensification, with an expected 25% considered for greenfield development.
 - 17.3. Hydraulic modelling of the projected 50-year wastewater demand identifies multiple network deficiencies, including within key trunk sewers and terminal pump stations. As a result, future spatial planning will have to consider decentralized wastewater networks with separate wastewater treatment plants rather than reliance on

¹ <https://www.greaterchristchurch.org.nz/assets/Documents/Work-Programme/Greater-Christchurch-Spatial-Plan/Greater-Christchurch-Spatial-Plan-2024.pdf>

capacity being available to convey wastewater to the central Christchurch Wastewater Treatment Plant. To avoid major infrastructure upgrades that would be needed to accommodate the 50-year demand, projected growth would need to be reduced by approximately 20,000 residential units. This aligns with the growth portion allocated to greenfield development and is consistent with the fact that infrastructure was designed to service the current zoned city boundaries.

- 17.4. The proposed rezoning of the John Paterson Development will contribute approximately 500 residential units or 17 Litres per second to the centralized wastewater network. While capacity can be provided in the downstream PS115 Longhurst pump station by upgrading the pumps to render sufficient duty/standby capacity, the development will contribute to capacity constraints further downstream when grouped with other growth. The development will also require recently constructed sewers and lift stations immediately downstream to be upgraded and improved.
- 17.5. The proposed development cannot be serviced via Springs Road and Halswell Junction Road, as doing so would require a significant upgrade to PS67 Halswell Junction Road pump station and its rising main. Upgrading this pump station would, in turn, necessitate upgrades to the Western Southern Relief Sewer in Springs Road, which would also require the upgrade of the initial section of the Southern Relief Sewer, between Curletts Road and Annex Road.
- 17.6. Servicing the new development as a local pressure sewer network, as used in the Southwest Halswell greenfield areas, could help limit downstream impacts on the centralized wastewater network, provided individual pump units are restricted from operating during wet weather. However, this approach would result in increased operating costs and property rates, particularly where Council ownership of the pressure sewer units is required. Council ownership is necessary to ensure effective control for ongoing flow attenuation; without it, performance would rely on all individual property owners to maintain service standards and maintenance agreements with third-party pump suppliers. It is not believed that the required level of control could be consistently assured if pressure sewer units are not vested in Council.

Stormwater and land drainage

18. With regard to stormwater Brian Norton, Senior Stormwater Planning Engineer at the Council, has reviewed the information provided and advised the location of the stormwater management facility as shown is not fundamentally opposed.
19. Mr Norton has otherwise noted with regard to land drainage that a portion of the site is subject to flooding, predominantly on the south east edges adjacent existing residential properties accessed via Luxembourg Crescent. If filling is required to enable development, consideration of the effects will be required, and mitigation may be required. This could include compensatory storage elsewhere on the site.

Transport

20. With regard to the existing transport environment and potential effects of a residential development of this scale, Andrew Milne, Team Leader Asset Planning Transport has advised:
 - 20.1. From a public transport serviceability perspective, Christchurch Infrastructure Design Standards require not less than 90% of dwellings to be within 500m from a proposed bus route. Approximate measurements indicate that only a small proportion of the Site meets this standard.
 - 20.2. The closest bus route (Route 7) is a high frequency service (every 10-minutes). As a high frequency route, it is anticipated to draw passengers from a 600m walkable catchment which captures only a small proportion of the site. Development of the site would add to Route 7 patronage, but only in a significant way if the route were to be extended towards the site. As it is the service is overcrowded, and as such, Crown funding to cover the costs of offsetting the additional demand would be required.
 - 20.3. Current-state operation of the road network has been assessed using Christchurch Assignment and Simulation Traffic (CAST) Model, using 2023 base model scenario.
 - 20.4. The modelling indicates that the Springs Road northbound approach to the roundabout is operating at approximately 90% of practical capacity in the morning peak period. This roundabout is provided with a signalled metered approach on Halswell Junction Road to provide opportunity for northbound traffic from Selwyn travelling on the Springs Road to be able to enter the roundabout.

- 20.5. At the same time the NZTA Christchurch Southern Motorway (CSM) off-ramp to Halswell Junction Road is operating at approximately 69% capacity utilisation in the morning peak. These results indicate that the corridor is already experiencing relatively high levels of demand during the morning peak period, particularly on the Springs Road approach from Selwyn.
- 20.6. During evening peak times, the CAST base model indicates that the NZTA CSM off-ramp operates at approximately 97% capacity utilisation. Springs Road, in the outbound direction toward Selwyn, is running at 77% saturation and other approaches to the roundabout indicate saturation levels of over 90%. These results indicate that the surrounding network is operating under considerable pressure during evening peak, with limited marginal resilience available to accommodate further traffic demand without significant infrastructure upgrade.
- 20.7. There are no planned capital projects for upgrades to these intersections.
- 20.8. The CAST base model indicates that the existing road corridors associated with Springs Road, Halswell Junction Road, and the NZTA Christchurch Southern Motorway off-ramp are currently operating close to their practical capacity, with only limited remaining storage and operational capacity available to accommodate additional development-related traffic demand.
- 20.9. At the moment, traffic signals operating on the Halswell Junction Road approach during peak periods are used to manage and discharge traffic into the Halswell Junction Road / Springs Road roundabout at controlled intervals. This arrangement creates short traffic gaps that allow vehicles travelling from Selwyn District along Springs Road to access the roundabout.
- 20.10. However, the outputs from CAST base model suggests that the existing traffic demand is pushing near its practical limit, and any further increase in traffic demand may lead to further congestion and potential spillback effects on downstream road links including the motorway off-ramp.
- 20.11. Overall, based on the findings of the CAST base model, it is strongly recommended that any future development generating a significant increase in traffic demand, should be subject to careful and comprehensive transport assessment, given the existing operational constraints and limited remaining capacity of the surrounding transport network infrastructure.

Urban design

21. With regard to urban design and integration with existing urban areas, David Hattam, Senior Urban Designer at the Council has reviewed the information provided and noted:
- 21.1. The provisions of the Residential New Neighbourhood Zone (RNN) are well suited to greenfield development, having been successful in providing for connectivity and a generally good standard of amenity and liveability in new subdivisions. Conditions enabling development in accordance with these provisions would likely be supported by CCC. In terms of the provisions applying within the RNN, the draft and tentative scheme plan demonstrates:
- 21.1.1. There is a range of lot sizes to provide for housing choice;
- 21.1.2. There is a connected movement network with small block sizes and good connections and walkability;
- 21.1.3. There is not an over-reliance on rear sections and rights of way for access.
- 21.2. Some unique features of the site are the proximity to the motorway and cycleway to the north and west and the waterway (Knights Stream) that runs behind Tongariro Street connecting to John Paterson Drive. There is an easement / reserve of some kind proposed next to it, which broadly mirrors the existing arrangement across the bank. A walkway (Horoeka Reserve) connects this reserve to Knights Stream Park and there are also on-street connections. Also of note is Knights Stream school opposite the park and access to the No.7 frequent bus route. Finally there is an existing stormwater basin to the northwest, next to the motorway. This is not a high amenity reserve, but is an open space which will impact the area, having some recreation value but may also be a place where antisocial behaviour can occur.
- 21.3. A weakness of the scheme (or missing information) is that we do not know if there is to be a bridge over the stream. A pedestrian connection opposite Horoeka Reserve would be useful to connect to the park and

school. Otherwise, the southern parts of the development are quite isolated and require long diversions to reach these facilities (ie an extra 500m):

- 21.4. On a similar note, the development appears to only include local roads. It would be useful to have a general idea of how the surrounding area may develop, and a road hierarchy developed from this. In particular, I would expect a collector road to be provided, probably as an extension of John Paterson Drive, through or around Busch Lane.
- 21.5. In terms of the matters listed under 8.8.9, being the matters of discretion applicable specifically to subdivision within the RNN:
 - 21.5.1. Integration, Context and Placemaking: Integration with the stream and stormwater is the most obvious issue. This appears to be reasonably well addressed. Another matter is the stormwater basin at the north west edge. Whilst there is a connection about a third of the way along the boundary, it would benefit from an additional one to avoid this becoming an isolated piece of land where anti-social behaviour would be encouraged.
 - 21.5.2. Subdivision Design: There would be a diversity of housing provided for although no comprehensive housing. It would be worth considering some alternative typologies (eg duplex lots) as these are popular elsewhere in Halswell. Corner sites tend to be slightly larger than others. Need to have a better idea of the road hierarchy and function before I can comment on the location of higher densities. There are few rear lots and generally a logical back-to-back pattern of housing.
 - 21.5.3. Movement Networks: note my comments on pedestrian connections.
 - 21.5.4. Public Spaces: there is a good variety of spaces (river, stormwater and parks). Some residents are quite distant from parks (although they are near the stormwater basin instead) but this would be helped with bridge crossings to allow access to existing parks. Roads seem to be 16m wide which is enough for trees but would like to see cross sections.
- 21.6. The proposal would generally meet the expectations expressed for the RNN with a couple of caveats:
 - 21.6.1. Need for a clear road hierarchy and collector roads;
 - 21.6.2. Need for additional pedestrian link to the stormwater basin at the north-west of the site;
 - 21.6.3. Need to clarify access across Knights Stream;
 - 21.6.4. Consider more variety of typologies (eg sites for duplexes).

Reserves and open space

- 22. With regard to the provision of parks and open space in new residential subdivisions generally, Peter Barnes, Senior Parks and Policy Planner at the Council has noted:
 - 22.1. The Council has committed to parks provision through the Parks Activity Plan, Public Open Space Strategy 2010 and District Plan ODPs.
 - 22.2. The Council vision is to provide, develop and maintain a publicly accessible network of open space. The Parks Activity Plan and POSS provides Open Space guidelines and Levels of Service. These are important so the Council provides a consistent network of parks city wide, for the community to utilise and enjoy.
 - 22.3. Neighbourhood Parks (of 3000m² or greater) (but not a stormwater reserve) provide a range of opportunities for the community, including open space, green landscapes, meeting places, children's play space and passive recreation. If an adequate number of Neighbourhood Parks are not provided, the community will have to travel significant distances to visit parks in other areas.
 - 22.4. Public open space is becoming increasingly important to support community wellbeing as private open space shrinks.

22.5. The Parks Activity Plan states the Level of Service for Neighbourhood Parks (or indeed other parks, except for Utility Reserves) is a 3000m² park located within 500m of 80% of residential lots. In addition, Neighbourhood Parks are provided in urban areas at a rate of at least 1.9ha/1000 population.

23. More specifically, with regard to the provision of reserves within the Site, Mr Barnes has noted an open space reserve of 3000m² is a positive contribution, however an additional 3000m² reserve is likely to be required to adequately provide recreation opportunities for the surrounding residential area.

Funding of infrastructure upgrades and connections to CCC infrastructure

24. Out of sequence development undermines the strategic and phased approach to planning and creates inefficiencies in infrastructure delivery by diverting funding from planned development. This proposal represents such out-of-sequence development. CCC's position is that infrastructure planning and investment needs to occur at a broader scale to achieve efficiencies and effectiveness of infrastructure provision. As this planning has not yet been undertaken for this area, any development at this stage would be ad hoc and may lock CCC into less optimal infrastructure outcomes.
25. In the case of this development, infrastructure upgrades will be required to enable the development to connect to the wider urban network, particularly in relation to wastewater services. Beyond the capital investment needed to upgrade this infrastructure, ongoing operational expenses will be required for maintenance and service delivery. These costs will largely be borne by the CCC.
26. The current Long-Term Plan makes no provision for either capital or operational expenditure in this area, and these costs are not reflected in the development contributions currently levied. Any decision by CCC to amend these plans to provide infrastructure for this development would require reprioritisation, potentially displacing planned investment in other areas of Christchurch.
27. As the infrastructure required to provide capacity to service this development is not in the current Long-Term Plan or Development Contributions Policy, the CCC has no funding available to provide the infrastructure upgrades. Greenfield development impacts downstream capacity in the wastewater network, if this development was aligned with CCC's area planning, the developer would be required to fund to their share of the cost to provide the infrastructure upgrades with the rest spread over a wider area which the CCC would then recover via development contributions. Funding sources to support transport infrastructure upgrades and public transport improvements to service the site would also need to be identified from sources beyond the CCC capital programme.
28. To address this funding gap identified, the Applicant will need to demonstrate how the upgrades to infrastructure can be achieved such that the development can be appropriately serviced, including both the connections to outfalls and downstream infrastructure where capacity is constrained. If unresolved and unfunded, CCC may refuse (under CCC bylaws²) any request for infrastructure connections until adequate capacity exists.

Benefits

29. The whether the development will have national or regional benefits is not clear, nor is the extent of any such benefit. The quantification of benefits should consider:
- 29.1. Whether any economic activity is generated by the development, or represents a transfer of economic activity that would occur elsewhere, either within the region or nationally;
- 29.2. Any reduction in available downstream infrastructure capacity for zoned land elsewhere in the District, including that enabled by Plan Change 14, enabling greater intensification of existing residential zoned land.

Conclusion

30. It is recommended that the proponent consider and respond to these matters identified above in any referral application. Pre-application meeting processes are available should further input from CCC be sought prior to the referral application being lodged, subject to staff availability.

Francis White
Senior Planner

² In particular, the **Water Supply and Wastewater Bylaw 2022** and **Stormwater and Land Drainage Bylaw 2022**.

Authorised by:

A handwritten signature in blue ink, appearing to be 'PL' or 'P. Lowe', written in a cursive style.

Paul Lowe
Manager Resource Consents

Appendix 1 – Information provided with notification

White, Francis

From: Kerstin Ghisel s 9(2)(a)
Sent: Thursday, 16 April 2026 4:04 pm
To: Lightbody, Kirk; Ward, Sean; Resource Consent applications
Subject: Notice of Intention to Lodge Fast-track Referral Application – John Paterson Estates Development
Attachments: E21189 Subcon R3.pdf

Hello,

John Paterson Estate Limited wishes to formally notify Christchurch City Council that it intends to lodge a referral application under the Fast-track Approvals Act 2024 ("FTAA") for the John Paterson Estates development ("the Project").

The Project comprises a residential subdivision which will establish:

- Approximately 501 residential lots, ranging in size from approximately 300m² to 1,000m²;
- Retention of four existing dwellings on larger lots ranging from approximately 1,100m² to 2,500m²;
- A new reserve and enhanced riparian margin adjacent to Knights Stream;
- An integrated street and reserve network, including stormwater management areas, to create a well-connected and cohesive neighbourhood;
- Open space throughout the development, including a central neighbourhood reserve (approximately 3,079m²) and stormwater basins with associated wetland areas (approximately 4.6ha) located to the south of the site, with potential integration with existing Council wetlands; and
- A future on-site pump station.

John Paterson Estate Limited considers that the Project will deliver significant regional benefits. Referral of the Project under the FTAA will facilitate its delivery, is unlikely to adversely affect the efficiency of the approvals process, and is consistent with section 22(1) of the FTAA.

As you are aware, John Paterson Estate Limited has already commenced consultation with Christchurch City Council in relation to this Project, including a meeting with Council staff in November 2025 and February 2026 and ongoing correspondence. We appreciate Council's engagement to date.

Approvals

A referral application under the FTAA must specify all approvals sought. The Project will require:

- Schedule 5 approvals under the Resource Management Act 1991;
- Schedule 7 approvals under the Wildlife Act 1953; and
- Schedule 8 approvals under the Heritage New Zealand Pouhere Taonga Act 2014.

Of particular relevance to Christchurch City Council are the approvals that would otherwise be required under the Resource Management Act 1991.

Statutory Notice

The FTAA (as amended on 31 March 2026) requires, prior to lodging a referral application with the Environmental Protection Authority (EPA):

- Written notice to relevant local authorities, iwi authorities, hapū, Treaty settlement entities, and administering agencies; and
- Compliance with the consultation requirements under section 11(1)(a) (where applicable).

In accordance with section 11 of the FTAA, this email constitutes formal notice that John Paterson Estate Limited intends to lodge a referral application for the Project. The application will not be lodged until at least 20 working days from the date of this notice, to allow Christchurch City Council the opportunity to provide feedback.

Project Description

The Project site is located along John Paterson Drive on the south-western edge of Christchurch and comprises approximately 37.7ha of land, including the following properties:

Address	Appellation	Record of Title	Landowner Name	Area (ha)
5 John Paterson Drive	Section 1 Survey Office Plan 560474	1003831	Lnv Trustees Limited	3.0488
6 John Paterson Drive	Section 10 Survey Office Plan 480694	987857	Grant Phillip England Halie Sharleen Kellaway Duncan Cotterill Christchurch Trustee (2017) Limited	3.8093
9 John Paterson Drive	Lot 2 DP 318764	73542	Andrew Nicholas Heazlewood Graham Charles Heazlewood Lnv Trustees Limited	3.9991
14 John Paterson Drive	Lot 7 DP 318764	73547	Sung-Chou Pan San-Tsun Yu	4.324
15 John Paterson Drive	Lot 3 DP 318764	73543	Bromac Lodge Limited	3.9971
19 John Paterson Drive	Lot 4 DP 318764	73544	Peter Ian Cullen Aiko Harcourt Martin Richard Harcourt	4.46
20 John Paterson Drive	Lot 6 DP 318764	73546	John Paterson Estates Limited	4.4573
26 John Paterson Drive	Section 16 Survey Office Plan 480694	725470	Neil Morton Sword Mercantile Sword Trustee Limited	6.3947
479 Marshs Road, Halswell	Lot 2 DP 81077	CB47A/324	Fudi Mao	3.2232

A draft scheme plan is attached to assist in understanding the proposed development.

If you have any questions, please get in touch, and I look forward to hearing from you in respect of this notice.

Thanks,
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate

s 9(2)(a)

s 9(2)(a)

PO Box 1749,
Christchurch 8140
Level 3, 61 Cambridge
Terrace,
Christchurch Central
City, Christchurch
8013



Kerikeri | Whangārei | Warkworth |
Auckland | Hamilton | Cambridge |
Tauranga | Havelock North | Wellington
|
Christchurch | Wānaka & Queenstown

barker.co.nz



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AMENDMENTS:		
AMENDMENT	DATE	DESCRIPTION
NOTES:		
1. Areas and dimensions are approximate only and are subject to final survey and deposit of plans.		
2. Service easements to be created as required.		
3. This plan has been prepared for so any other parties.		

Density Area = 32.782 ha
Number of Lots = 501
Density = 15.28 hh/ha



DAVIE LOVELL-SMITH
PLANNING SURVEYING ENGINEERING

116 Wrights Road P O Box 679 Christchurch 8140, New Zealand
Telephone: 03 379-0793 Website: www.dls.co.nz E-mail: office@dls.co.nz

JOB TITLE:
John Paterson Drive

SHEET TITLE:
**Development Site Plan
(Section 1 SO 560474,
Lot 2 DP 318764, Section 10 SO
480694, Lot 9 DP 318764, Lot 3 DP
318764, Lot 4 DP 318764, Lot 7 DP
318764, Lot 6 DP 318764, Section
16 SO 480694)**

DRAWING STATUS:
For Discussion Purposes

SCALE: 1:1600@A1
1:3200@A3

DATE: March 2026

CAD FILE: J:\21189\SUBCON\E21189 Subcon R3.dwg

DRAWN: JS

DRAWING No.: **E21189**

SHEET No.: 1 OF 1

REVISION: **R3**

Appendix 2 – CCC strategic planning and policy advice on Fast Track referrals

City Planning Unit

Date: 31 July 2026

Title: **Strategic planning and policy advice on Fast Track referrals received by Christchurch City Council**

From: Helaina Gregg, Principal Advisor Policy; Sarah Oliver, Team Leader Planning

To: Francis White, Senior Planner; Owen Jeffreys, Planner Level 3; Vincent Ashman, Senior Planner; Odette White, Senior Planner

CC: Paul Lowe, Manager Resource Consents; Ben Rhodes Manager Planning

Introduction

This memo provides strategic planning and policy advice on Fast Track referrals received by Christchurch City Council seeking to urbanise land currently zoned rural under the Christchurch District Plan.

The advice comments on the strategic alignment of these proposals, context within the Council's planning programme, and impacts of these proposals on Council infrastructure and service provision.

Greater Christchurch Spatial Plan

The Greater Christchurch Spatial Plan (GCSP), the Future Development Strategy for Greater Christchurch's urban environment, sets out the Council's vision for how the subregion will grow and change over the next 30 years.

The GCSP, together with the Christchurch District Plan, guides Council's planning and investment into infrastructure and services. The strategy for Christchurch has long directed growth towards targeted intensification within its urban centres and along key public transport corridors.

Major greenfield growth areas were planned with supporting infrastructure in the early 2000's, with many near reaching full development. This approach has maintained a competitive housing market and enabled the city to recovery well from the impacts of the Canterbury Earthquakes.

Whilst the city retains some rural zoned land around its periphery and within Banks Peninsula, its use and contribution to the rural economy is limited. Further, council recognises the on-going demand for standalone housing and large-scale industrial developments, more readily able to be provided for through greenfield developments.

The GCSP recognises that greenfield development will continue to play a role in accommodating future housing and business growth. To support the Plan's direction and principles, greenfield development needs to:

1. Be well connected with employment, services and leisure through public and active transport networks
2. Be integrated with existing urban areas
3. Meet a need identified by the latest Housing and Business Development Capacity Assessment
4. Be at the right scale, density and location to minimise impact on highly productive land and existing permitted or consented primary production activities.

Ōtautahi Christchurch Planning Programme

The implementation of the GCSP, including consideration of future urban areas, is primarily directed through the Ōtautahi Christchurch Planning Programme, which was endorsed by the Council in November 2024.

The OCPP sets out the city's planning priorities and guides the delivery of outcomes under the Christchurch District Plan and national direction such as the National Policy Statement for Urban Development. Regarding greenfield development, the ŌCPP is focusing on locations that exhibit the following:

- High demand
- Good accessibility to employment and services
- Ability to meet a specific housing need
- Commitment to protecting natural and cultural landscape character and settings, and highly productive land
- Which do not foreclose long-term options for rural, open space and community uses.

Until the council has undertaken its evaluation of options for new greenfield land, including investigated, designed, approved and funded growth infrastructure, there is very limited capacity to support additional greenfield development, beyond that already enabled. Strategic planning is fundamental to understanding how new developments may impact the operation of wider networks and flow on effects potentially constraining planned enabled area, importantly medium and higher density zoned areas.

Fast Track proposals seek to proceed in advance of council's programme, risking development being planned and designed in an ad hoc and uncoordinated manner. This approach undermines the Council's ability to deliver integrated and optimal infrastructure outcomes, and its ability to service plan-enabled growth and capacity.

Accordingly, our position is that additional greenfield development in these areas should not be progressed until the necessary strategic planning has been completed and an appropriate infrastructure and investment response for the city has been identified.

Housing Development Capacity Assessment

The justification to rezone land now in an ad hoc, uncoordinated manner, is not evidenced by a lack of feasible housing capacity. The demand for additional housing in Christchurch over the short, medium and long term is shown in Table 1 below. The plan-enabled capacity from residential, commercial and mixed-use zones is 458,000. The total feasible capacity is 68,200, comprising of residential zones (50,800), high density and mixed use (9,800) and Greenfield (7,600).

Table 1: Demand for additional housing in Christchurch City

Area	Short (5 year)	Medium (10 year)	Long (30 year)
Christchurch	11,208	22,152	65,640

*based on high projection +20 percent margin

This assessment confirms that Christchurch has sufficient development capacity to meet anticipated housing demand over the next 30 years and satisfy its obligations under the NPS-UD.

An updated assessment is to be completed shortly, but again concludes Christchurch has sufficient development capacity over the next 30 years. It does however raise an opportunity to review demand for standalone homes across the broader Greater Christchurch region, including the ability of the current stock to meet future needs, and how any additional demand can be accommodated through well planned neighbourhoods in the appropriate locations.

Impacts on the Council's planned infrastructure and service provision

Large scale infrastructure projects require long lead times for planning, financing, and delivery. This means following a long-term plan is essential for delivery. If priorities shift to unplanned and out of sequence development, there are opportunity costs, such as displacing planned investment (both capex and opex), for planned and sequenced infrastructure and service provision.

The current Christchurch Long-Term Plan makes no provision for either capital or operational expenditure in this area to enable greenfield development, and these costs are not reflected in the development contributions currently levied. Any decision by the Council to amend these plans to provide infrastructure for this development would require reprioritisation, potentially displacing planned investment in other areas of Christchurch.

Enabling additional large-scale development through the fast-track process, ahead of planned sequencing, therefore risks creating levels of out-of-sequence growth that are difficult and costly to service. This has the potential to place substantial pressure on infrastructure networks and Council services that are already under strain and are not currently planned or funded to support development in these areas.

To address this funding gap identified, any fast-track proposal will need to demonstrate how the upgrades to infrastructure can be achieved such that the development can be appropriately serviced, including both the connections to outfalls and downstream infrastructure where capacity is constrained. If unresolved and unfunded, Council may refuse (under Christchurch City Council bylaws) any request for infrastructure connections until adequate capacity exists.

Conclusion

While it is recognised that there continues to be strong market demand for stand-alone housing across Greater Christchurch, there is currently limited capacity to support additional greenfield development in the remaining Christchurch rural areas. Recognising this market demand for greenfield development, Council has a growth programme in place to evaluate options and investigate infrastructure provision.

Fast Track proposals are not resolving a current regional issue in terms of insufficiency, nor if approved will be effective in improve market competitiveness, given the significant current infrastructure capacity constraints. It is Council's position that Fast Track proposals should not be progressed until the necessary strategic planning has been completed and an appropriate infrastructure and investment responses have been identified. The timing of this work being to occur in such time to inform the development of the Regional Spatial Plan, being the most appropriate process to identify future long term growth areas.

Hon Tama Potaka

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing



21 July 2026

Hon. Chris Bishop
Minister for Infrastructure
Infrastructure.portfolio@parliament.govt.nz
Parliament Buildings
Private Bag 18041
WELLINGTON 6160

CORTP-8323

Tēnā koe Hon. Bishop

Thank you for your invitation to comment on the fast-track consent application for the **John Paterson Estates** development in Halswell, Christchurch. The proposal comprises a master-planned residential neighbourhood involving the subdivision of approximately 37.7 hectares of land into around 510 residential lots, together with supporting infrastructure, an integrated street and reserve network, enhanced riparian margins adjoining Knights Stream, stormwater management infrastructure, and a future pump station.

Christchurch continues to experience strong housing demand. While Christchurch remains relatively less expensive than other main centres, home prices and rents have outpaced national trends over recent years. In the three years to March 2026, rents in Christchurch increased by 14.7 percent compared with 4.3 percent nationally, while house prices increased by 8.5 percent compared with a 1 percent decline nationally. Significant greenfield residential capacity was enabled following the Canterbury earthquakes. The scale of the proposal would provide a substantial increase in housing supply and help meet future housing demand in the city.

The site is currently zoned Rural Urban Fringe and is located adjacent to the existing urban area. It forms a logical extension of residential development in Halswell and is within short driving distance of local amenities, services and employment areas. While public transport accessibility is currently limited, the site is located near an existing high-frequency bus route that could potentially be extended in the future.

The proposal is expected to deliver positive housing and community benefits through increased housing capacity, supporting infrastructure, and environmental enhancements along Knights Stream. We are not aware of any particular hazards or infrastructure constraints associated with the site. While detailed planning matters will require further consideration, these can be worked through at the detailed consenting stage. From the perspective of the Housing Portfolio, I have no objection to this application being referred to the next stage of the fast-track process. Thank you again for the opportunity to comment.

Mauriora,

A handwritten signature in blue ink that reads 'Tama Potaka'.

Hon Tama Potaka
Associate Minister of Housing

From: [Infrastructure Portfolio](#)
To: [FTAreferrals](#)
Subject: FW: CORPG4942 / Invitation to comment on Fast-track referral application for the John Paterson Estates project under the Fast-track Approvals Act 2024 – FTAA-2605-1235
Date: Tuesday, 30 June 2026 9:46:54 am

From: Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Sent: Tuesday, 30 June 2026 9:45 AM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: RE: CORPG4942 / Invitation to comment on Fast-track referral application for the John Paterson Estates project under the Fast-track Approvals Act 2024 – FTAA-2605-1235

Good morning,

No comment from Minister for Arts, Culture and Heritage.



Victoria Court
Private Secretary – Arts, Culture and Heritage | Office of Hon Paul Goldsmith
Minister for Arts Culture and Heritage | Minister of Justice
Minister for Media and Communications | Minister for Pacific Peoples
Minister for the Public Service and Digitising Government
Minister for Treaty of Waitangi Negotiations
Phone: s 9(2)(a)
s 9(2)(a) Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Friday, 19 June 2026 8:16 AM
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Shane Jones (MIN) <S.Jones@ministers.govt.nz>; Nicola Grigg (MIN) <N.Grigg@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Cc: FTAreferrals <ftareferrals@mfe.govt.nz>
Subject: CORPG4942 / Invitation to comment on Fast-track referral application for the John Paterson Estates project under the Fast-track Approvals Act 2024 – FTAA-2605-1235

To:

- Minister for Economic Growth
- Minister for Regional Development
- Minister for the Environment
- Minister for Māori Crown Relations: Te Arawhiti
- Minister for Māori Development
- Associate Minister of Housing
- Minister of Conservation
- Minister for Arts, Culture and Heritage

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister), has asked for me to write to you on his behalf.

The Minister has received an application from John Paterson Estates Limited for referral of the John Paterson Estate project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2605-1235).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **15 working days** of receipt of this email, being **13 July 2026**. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferrals@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Minister for Infrastructure's office they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform my office and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	John Paterson Estates
Applicant	John Paterson Estates Limited
Location	Halswell, Christchurch
Project description	The project involves the subdivision of 37.7 hectares of Rural Urban Fringe zoned land to establish a residential neighbourhood at John Paterson Drive, Halswell located on the south-western edge of Christchurch. The project will include construction of key infrastructure to enable the future development of each lot. Key components of the project include: • the subdivision of land into approximately 510 residential lots • an enhanced riparian margin adjacent to Knights Stream. • an integrated street and reserve network incorporating stormwater

management

- a future onsite pump station.

Kind regards,



Office of Hon Chris Bishop

Attorney-General | Minister of Housing | Minister for Infrastructure | Minister Responsible for
RMA Reform | Minister of Transport | Associate Minister of Finance | MP for Hutt South

Office: 04 817 6802 | EW 6.3

Email: c.bishop@ministers.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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20 July 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0035054

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on the following referral applications:

- John Paterson Estate, FTAA-2605-1235
Out of Scope

I am providing comment in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided in their referral applications.

John Paterson Estate, FTAA-2605-1235

This application is for a 38-hectare residential development in John Paterson Drive, Halswell, located on the south-western edge of Christchurch. The development includes 510 residential lots, along with associated infrastructure including stormwater ponds, wetlands, a pump station and integrated road, cycling, and pedestrian networks.

Based on the independent economic assessment provided by the applicant, the economic benefits of the proposal are expected to be concentrated during its five-year construction and development period. During this time, the development is estimated to have a direct one-time contribution of \$52 million to GDP, support around 81 direct full-time equivalent (FTE) roles annually and generate \$34 million in direct wages and salaries. Indirect impacts are estimated to support a further 185 FTE roles per year, contributing a total of \$80 million in wages and salaries and \$139 million in GDP value-add over the same period.

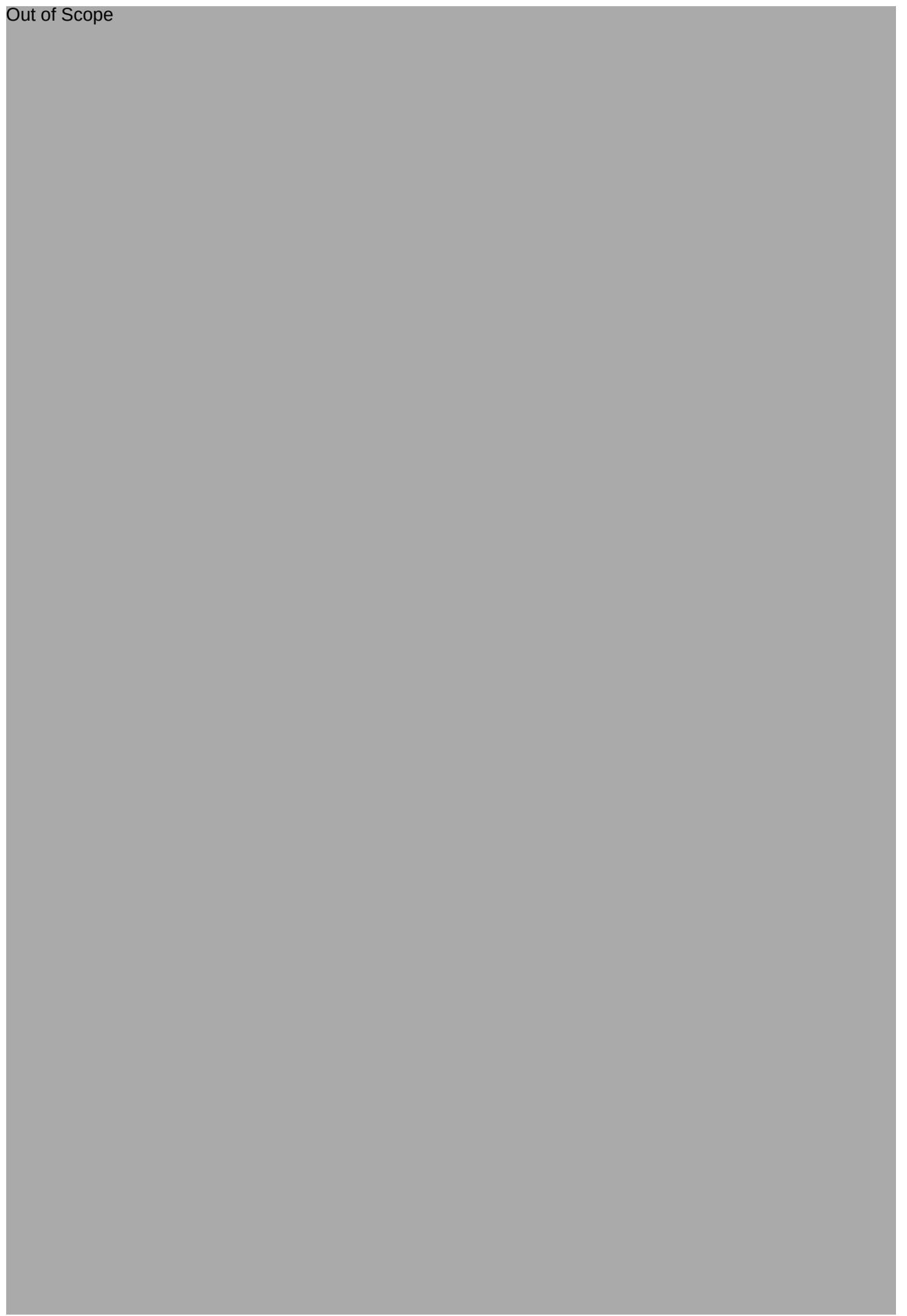
The assessment does not quantify long-term economic impacts beyond the development period. However, it notes potential wider benefits, including increased housing supply in Christchurch's growing southern urban area and investment signalling effects that may encourage further development.

The primary long-term benefit of this proposal is its provision of additional housing which is critical for a growing economy. While the project is expected to generate material economic benefits for Christchurch during its construction and development phase, its primary benefit is increasing housing supply. This proposal may therefore be considered under s22(2)(a)(iii) of the Fast-track Approvals Act, to the extent that it would increase housing supply, address housing needs and contribute to a well-functioning urban environment in Christchurch.

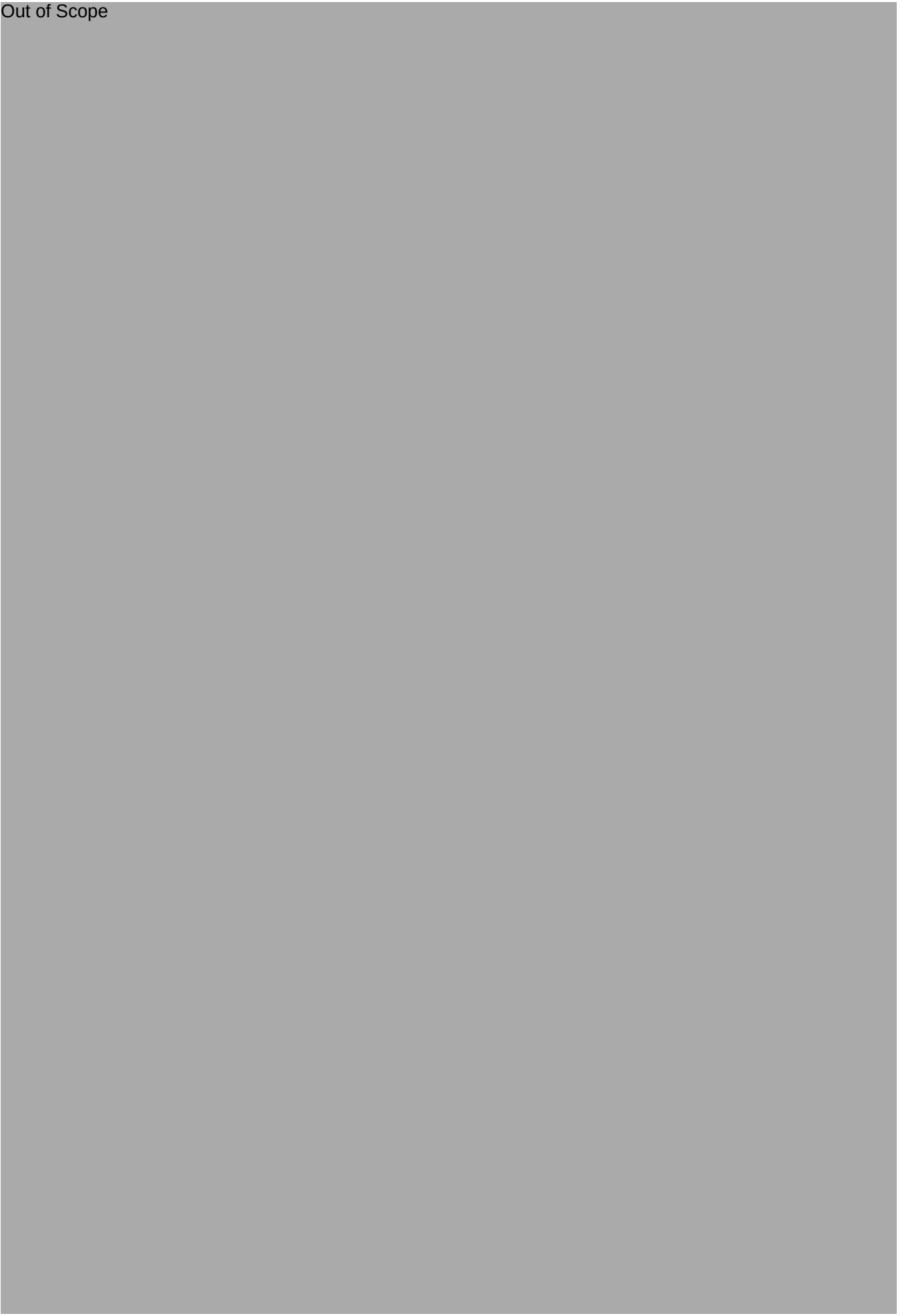
Out of Scope



Out of Scope



Out of Scope



s 9(2)(a)

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis', with a large, stylized initial 'N'.

Hon Nicola Willis
Minister for Economic Growth



Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing

By email: infrastructure.portfolio@parliament.govt.nz

Tēnā Koe Minister Bishop,

Invitation to comment on the John Paterson Estates Project under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on the **John Paterson Estates Project** under section 17 of the Fast-track Approvals Act 2024.

I have considered the application and its alignment with my portfolios as Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report prepared by the Ministry for the Environment.

Nāku noa, nā

Hon Tama Potaka

Te Minita mō Te Arawhiti me Te Minita Whanaketanga Māori
Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

Your written comments on a project under the Fast-track Approvals Act 2024

Project name	John Paterson Estates
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Department of Conservation (DOC)		
*First name	David		
*Last name	Greaves		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz ;		

2. Please provide your comments on this application

Comments follow overleaf.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manager's signoff

Linda Kirk
Fast Track Application's Manager

13 July 2026

Director-General of Conservation s17 comments

Project name	John Paterson Estates
Applicant name	John Paterson Estates Limited
Application number	FTAA-2605-1235
Project summary details	The project involves the subdivision of 37.7 hectares of Rural Urban Fringe zoned land to establish a residential neighbourhood at John Paterson Drive, Halswell located on the south-western edge of Christchurch. The project will include construction of key infrastructure to enable the future development of each lot. Key components of the project include: - the subdivision of approximately 510 residential lots - an enhanced riparian margin adjacent to Knights Stream - construction of streets and infrastructure - establishment of reserves - a future onsite pump station. The applicant is seeking the following approvals through the fast-track approvals process: - resource consent under the Resource Management Act 1991 - an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 - a wildlife authority under the Wildlife Act 1953 - approval under the Freshwater Fisheries Regulations 1983 for the construction of any dam or culvert in Knights Stream (complex freshwater fisheries approval).

1. General comment

- 1.1.1. As the Project includes approvals under specified Acts for which DOC is the administering agency (being the Wildlife Act 1953 and the Freshwater Fisheries Regulations 1983), the applicant was required to notify DOC in accordance with section 11 of the Fast Track Approvals Act 2024 (the 'FTAA' or the 'Act').
- 1.1.2. A meeting between DOC and the Applicant occurred on the 18th of March 2026 wherein the Applicant provided an overview of the project, including preliminary plans and a high-level ecological assessment. DOC provided a formal pre-lodgement consultation summary to the Applicant on the 30th of March 2026.
- 1.1.3. While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, DOC considers that it is likely that with the appropriate design and conditions, effects can be managed to appropriate levels.

1.1.4. DOC is not aware of any reason the project should not be referred.

2. Minister's decision on referral application

2.1.1. FTAA sections 21 and 22 set out matters to be considered in determining whether a referral application should be accepted.

2.1.2. DOC notes that other agencies are better placed to comment on most matters, including those in section 22. Comments below are therefore targeted to sections where DOC has specific interests or information relevant to the Minister's decision.

2.1.3. For completeness, DOC has considered the criteria for assessing referral applications in section 22 and has not identified anything it considers the Minister should take into account that has not already been acknowledged by the Applicant in its referral application.

2.1.4. Section 21(3) and (4) set out when the Minister may/must decline a referral application. DOC has considered these criteria and comments as follows:

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	DOC has considered section 5(1) (f), (h), (i), (j) and (k) of the Act. DOC has not identified any aspect of the Project that would be ineligible under these sections.
21(3)(c)	Is there adequate information to inform a decision	DOC considers that there is adequate information to evaluate the proposal in terms of a referral decision. Further investigation should be undertaken with regard to bat habitat and the potential effects resulting from the removal of habitat. A bat management plan, tree felling protocol and lighting controls may be necessary. Additionally, further detail is required as to the scope of works within Knights Stream with regard to the Complex Freshwater Fisheries Approval.
21(4)	Are there any other reasons not specified	DOC has not identified any other reasons why the Project should not be referred.
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019;	DOC has not identified any inconsistency with any relevant settlement or other obligation. Relevant Treaty Settlement Acts are: • Ngāi Tahu Claims Settlement Act 1988

Section	Criteria	Comments
	Marine and Coastal Area (Takutai Moana) Act 2011.	
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	DOC has not identified any reason why the Wildlife Act or complex freshwater fisheries regulation approval should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Based on our knowledge of the existing environment and species expected to occur on the site, our understanding of the Project, and our experience of the kinds of design measures and conditions that could be implemented, DOC considers that once more detailed information is available, it would be possible to achieve a project with the imposition of conditions (that are appropriate, enforceable, include best management practice, and apply the relevant ecological management plans, as and where required), that does not have significant adverse effects on the environment.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the Applicant's compliance history.
21(5)(g)	Would a substantive application have any competing applications	No competing applications have been identified.

2.1.5. Section 22 sets out the criteria for the Minister for accepting a referral application. DOC has considered these criteria and comments as follows:

Section	Criteria	Comments
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	A Wildlife Act approval and complex freshwater fisheries would generally take approximately three-four months to process, which is not significantly longer than the FTAA process is expected to take. However, there may be benefits for the Applicant in terms of consideration being combined with RMA approvals (rather than being advanced by a separate process) and given the different decision-making framework under the FTAA.
22(2)(a)(ix)	Will this project address significant environmental issues?	No.
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	The following DOC Statutory Planning documents are relevant to the Proposal: • Conservation General Policy 2005 ('CGP'); • Canterbury (Waitaha) Conservation Management Strategy 2016. The Proposal is not inconsistent with the relevant statutory planning provisions. However, consideration should be given to: • Maintaining and restoring the ecological integrity of relevant ecosystems and habitat types; • Conserving any threatened and at-risk species to ensure their persistence; • Protecting freshwater fish habitat, fish passage and the maintenance of habitat connectivity and water quality of any waterway.
22(b)	Any other matters the Minister may consider as relevant?	• The applicant has determined a Wildlife Act approval is required to handle, capture and relocate salvaged lizards, if discovered on-site, including any accidental killing. Assessments should be undertaken to confirm lizard presence and mitigation needs and relocation in preparing the potential substantive application • Further clarification is required with regards to works within Knights Stream. It is noted that the applicant is seeking a complex freshwater fisheries approval but no details are currently provided.

3. Other considerations

- 3.1.1. DOC has provided input to a number of fast-track projects to date where additional conservation approvals that would have been available under the FTAA have not been included in a substantive application. In some cases, it has been necessary for applicants to seek additional approvals via normal processing. This can result in inefficiencies, additional costs and undermining the benefits of the 'one stop shop' approach of the FTAA.
- 3.1.2. DOC recommends the Applicant consider whether it should seek to include additional approvals that may be required for the project and suggests the Minister should consider whether further information should be sought from the Applicant.
- 3.1.3. Given the lack of specific detail in the referral application, DOC considers it would be highly beneficial for the Applicant to engage further with DOC as it relates to any conservation approvals (as well as conservation matters subject to RMA consideration) prior to making any substantive application. Benefits include ensuring information necessary to support decision-making with respect to conservation approvals is included; supporting the management of any actual and potential adverse effects on the environment; and early identification and resolution of any issues.

4. Matters for the Minister to specify (s27)

- 4.1.1 None identified.



Linda Kirk
FastTrack Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 13 July 2025

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011



Comments on referral application under the Fast Track Approvals Act 2024

John Paterson Estates, FTAA-2605-1235

Contact Details	
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)
Contact person	HNZPT Fast-track Team
Contact Number	s 9(2)(a)
Email	fasttrack@heritage.org.nz

General Comments

1. John Paterson Estates Limited (Applicant) has lodged an application for referral of the John Paterson Estates (project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. In accordance with section 17(1)(c) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the referral application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.
3. HNZPT has been provided application documents that are relevant to the archaeological authority application. These have been assessed and HNZPT comments as follows:

Consultation and Engagement

4. On 2 March 2026 the Applicant's agent met virtually with HNZPT. The historical background and archaeological potential of the project area were discussed, and the applicants were advised to engage a consultant archaeologist.
5. On 16 April 2026, the applicant emailed HNZPT notifying them of their intent to lodge a referral application under the FTAA.
6. On 13 May 2026, HNZPT provided a response to the notification, noting that:
 - the applicant will be applying for an archaeological authority as part of the Fast-track process
 - the project area has potential for archaeological sites to be present, including Māori archaeological sites
 - HNZPT recommends engaging a suitably qualified archaeologist to assess the effects of the project on any potential subsurface archaeological sites.

Archaeological Authority Application

7. The Applicant has not provided an archaeological assessment at this stage. The applicant has stated they have engaged an archaeologist, and that any resulting assessment will form part of the substantive application.



8. The project area is of significance to Ngāi Tahu hāpori due to their continuing relationship with the cultural landscape that the project area sits within. The Opoira / Knights Stream is within and adjacent to the development area and forms part of the wider catchment connecting to the Hurutini (Halswell) River and ultimately Te Waihora (Lake Ellesmere). The freshwater and terrestrial resources found within the area were an integral part of mahinga kai and mahinga toi practices that have supported the iwi for generations.
9. HNZPT notes that relevant Ngāi Tahu entities are being consulted with. Should the project be referred, appropriate consultation documentation with tangata whenua, as set out in Clause 2(i) in Schedule 8 of the FTAA 2024, must be provided with a substantive application.
10. HNPZT notes that no Cultural Impact Assessment has been provided with this application. The applicant states they are conducting further consultation to understand the cultural impacts of this development and how issues can be mitigated.

Effects on Archaeological Values

11. In order to mitigate the adverse effects on archaeological values, a suite of conditions will be required.
12. This has been discussed with the Applicant and will continue through the application process.

Conclusion

13. If the project is referred, HNZPT anticipates further engagement with the Applicant to ensure all relevant documentation is provided with a substantive application, including:
 - A fulsome archaeological assessment;
 - Appropriate methodologies and strategies proposed;
 - Appropriate draft management plan and research strategy;
 - Evidence of appropriate consultation with tangata whenua; and
 - Appropriate draft conditions.

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	John Paterson Estates
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All sections of this form with an asterisk (*) must be completed.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	NZ Transport Agency		
*First name	Nicola		
*Last name	Foran		
Postal address	Private Bag 6995, Wellington 6141, New Zealand		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application

NZTA thanks the Minister for the opportunity to comment on the referral of this application into the fast track approvals process.

NZTA has had pre-application engagement with the application regarding this project.

NZTA considers that the ITA prepared for any substantive application must be prepared in consultation with NZTA to ensure the assessment addresses potential concerns. The ITA will need to include modelling agreed with NZTA, including network modelling and more detailed SIDRA analysis of intersections, and in particular the impact from the proposal on the highway roundabout (at Halswell Junction Road/ Richmond Avenue/SH76 offramp). The ITA should identify any necessary mitigation, staging controls, upgrade triggers, monitoring requirements, or other measures needed to ensure the safe and efficient operation of SH76/CSM2 and the wider interchange environment.

The substantive application should also address the interface of the development with the CSM2/SH76 designation. The referral material indicates that approximately 7,000 m² of the application site, including parts of 5, 6 and 19 John Paterson Drive and part of John Paterson Drive, is within the NZTA designation, but does not provide a detailed assessment of how subdivision or development within the designation will be authorised or managed.

[IN CONFIDENCE]

The scope of works within the designation will need to be clarified, which will or may include allotments, infrastructure, acoustic bunding/fencing, landscaping, stormwater assets, or other development. Any development within the designation or adjacent where it may affect the designation (e.g., stormwater runoff) will require approval from NZTA (s176 of the RMA) which may include controls to avoid effects on motorway operation, maintenance, drainage, sightlines, or designation land.

Noise and reverse-sensitivity effects on properties and dwellings associated with the operation of SH76/CSM2 appears capable of being addressed through detailed design and conditions, but the substantive application should confirm the affected allotments. The substantive application should also outline the applicable Christchurch District Plan internal noise standards, mechanical ventilation requirements where needed, and the location, design, ownership, and maintenance of any mitigation.

Overall, NZTA does not have any concerns with this application being referred into the fast-track approvals process. NZT would welcome the opportunity to provide comments to the applicant as they prepare any substantive application, and if referred, would appreciate the opportunity to provide comment on that substantive application.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment. **Managers signoff**

A handwritten signature in blue ink that reads "nicolaforan". The signature is written in a cursive, lowercase style.

Nicola Foran

Date 13 July 2026

[IN CONFIDENCE]

MANA WHENUA ADVICE

J8037 – John Paterson Estate Project - Fast Track Application FTAA-2605-1235

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Mahaanui Kurataiao		
*First name	Grace		
*Last name	King		
Postal address	226 Antigua St, Christchurch Central		
*Contact phone number	s 9(2)(a)	Alternative	s 9(2)(a)
*Email	s 9(2)(a) Mahaanui.admin@ngaitahu.iwi.nz		

1.0 Mana Whenua Statement

To: Fast Track Authority

Contact: Stephanie Frame

Ngāi Tahu holds and exercises rangatiratanga within the Ngāi Tahu Takiwā and has done so since before the arrival of the Crown. The rangatiratanga of Ngāi Tahu resides within the Papatipu Rūnanga. The Crown and Parliament have recognised the enduring nature of that rangatiratanga through:

- Article II of Te Tiriti o Waitangi (Te Tiriti);
- the 1997 Deed of Settlement (Deed of Settlement) between Ngāi Tahu and the Crown; and
- the 1998 Ngāi Tahu Claims Settlement Act (NTCSA) in which Parliament endorsed and implemented the Deed of Settlement.

The contemporary structure of Ngāi Tahu is set down through the Te Rūnanga o Ngāi Tahu Act 1996 (TRoNT Act). Article II of Te Tiriti o Waitangi (Te Tiriti), the TRoNT Act, Ngāi Tahu Claims Settlement Act (NTCSA) 1998, and the 1997 Deed of Settlement (Deed of Settlement) between Ngāi Tahu and the Crown sets the requirements for recognition of tangata whenua in Canterbury.

¹Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

As recorded in the Crown Apology to Ngāi Tahu in the NTCSA, the Ngāi Tahu Settlement marked a turning point, and the beginning of a “new age of co-operation”. The Crown apologised for its “past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the South Island lands within its boundaries” and confirmed that it “recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui”. This Mana Whenua Advice Report is provided without prejudice to the High Court freshwater claim¹.

Each Papatipu Rūnanga has their own respective takiwā, and each is responsible for protecting the tribal interests in their respective takiwā, not only on behalf of their own hapū, but again, on behalf of the entire tribe.

The following Rūnanga hold mana whenua over the project’s location, as it is within their takiwā:

- Te Taumutu Rūnanga

2.0 Summary of Proposal

Mahaanui has been invited to comment on the Referral Application initiated by John Paterson Estate Limited / Urban Estates in accordance with the Fast-Track Approvals Act 2024.

Approval is sought to enable the development of approximately 38-hectares of land at John Paterson Drive, Halswell, into a residential development. The completed project would create approximately 510 residential lots, new roads, servicing, a stormwater management area, riparian areas, and reserves.

Te Taumutu Kaitiaki provided **preliminary advice** on this proposal in April 2026. Many of the comments and recommendation remain relevant from this time.

This response does not remove the need for mana whenua consultation once the proposal reaches the substantive stage.

3.0 Consultation Methodology

Mahaanui Kurataiao Limited review the application documents and undertake an assessment of the application against the Mahaanui Iwi Management Plan.

A briefing report is prepared for Kaitiaki representatives who have been mandated by the Papatipu Rūnanga they represent to speak on behalf of hapū on environmental issues.

A Mahaanui Kurataiao Limited staff member meets with Kaitiaki representatives to discuss the application and Kaitiaki provide feedback based on Mātauranga Māori.

Mana Whenua Advice is provided to outline the relevant policies in the Mahaanui Iwi Management Plan and the feedback provided by Kaitiaki representatives.

The relevant policies and Kaitiaki feedback for this application are provided in the following sections of this report.

4.0 Mahaanui Iwi Management Plan 2013

The Mahaanui Iwi Management Plan (IMP) is a written expression of kaitiakitanga, setting out how to achieve the protection of natural and physical resources according to Ngāi Tahu values, knowledge, and practices. The plan has the mandate of the six Papatipu Rūnanga, and is endorsed by Te Rūnanga o Ngāi Tahu, as the iwi authority.

Natural resources – water (waterways, waipuna (springs), groundwater, wetlands); mahinga kai; indigenous flora and fauna; ngā tūtohu whenua and land - are taonga to mana whenua and they have concerns for activities potentially adversely affecting these taonga. These taonga are integral to the identity of ngā rūnanga mana whenua and they have a kaitiaki responsibility to protect them. The policies for protection of taonga that are of high significance to ngā rūnanga mana whenua are articulated in the IMP.

The policies in this plan reflect what Papatipu Rūnanga support, require, encourage, or actions to be taken with regard to resolving issues of significance in a manner consistent with the protection and enhancement of Ngāi Tahu values, and achieving the objectives set out in the plan.

The relevant Policies of the IMP to this proposal have been identified as:

5.3 WAI MĀORI

TĀNGATA WHENUA RIGHTS AND INTERESTS IN FRESHWATER

- WM1.1** Ngāi Tahu, as tāngata whenua, have specific rights and interests, in how freshwater resources should be managed and utilised in the takiwā.
- WM1.2** Te Tiriti o Waitangi is the basis for the relationship between Ngāi Tahu and local authorities (and water governance bodies) with regard to freshwater management and governance in the takiwā.

PRIORITIES FOR USE

- WM3.1** To advocate for the following order of priority for freshwater resource use, consistent with the *Te Rūnanga o Ngāi Tahu Freshwater Policy Statement (1999)*:
- (1) That the mauri of freshwater resources (ground and surface) is protected and sustained in order to:
 - (a) Protect instream values and uses (including indigenous flora and fauna);
 - (b) Meet the basic health and safety needs of humans, specifically the provision of an untreated and reliable supply of drinking water to marae and other communities; and
 - (c) Ensure the continuation of customary instream values and uses.
 - (2) That water is equitably allocated for the sustainable production of food, including stock water, the generation of energy; and
 - (3) That water is equitably allocated for other abstractive uses (e.g. development aspirations).

WATER QUALITY

- WM6.1** To require that the improvement of water quality in the takiwā is recognised as a matter of regional and immediate importance.
- WM6.2** To require the water quality in the takiwā is of a standard that protects and provides for the relationship of Ngāi Tahu to freshwater. This means that:
- (a) The protection of the eco-cultural system (see box – Eco-cultural systems) is the priority, and land or resource use, or land use change, cannot impact on that system; and
 - (b) Marae and communities have access to safe, reliable, and untreated drinking water; and
 - (c) Ngāi Tahu and the wider community can engage with waterways for cultural and social well-being; and
 - (d) Ngāi Tahu and the wider community can participate in mahinga kai/food gathering activities without risks to human health.

Discharges

- WM6.8** To continue to oppose the discharge of contaminants to water, and to land where contaminants may enter water.
- WM6.11** Consented discharge to land activities must be subject to appropriate consent conditions to protect ground and surface water, including but not limited to:
- (a) Application rates that avoid over saturation and nutrient loading;
 - (b) Setback or buffers from waterways, wetlands, and springs;
 - (c) Use of native plant species to absorb and filter contaminants; including riparian and wetland establishment and the use of planted swales; and
 - (d) Monitoring requirements to enable assessment of the effects of the activity.

Controls on land use activities to protect water quality

- WM6.16** To require, in the first instance, that all potential contaminants that may enter the water (e.g. nutrients, sediments and chemicals) are managed on site and at source rather than discharged off site. This applies to both rural and urban activities.
- WM6.17** To require the development of stringent and enforceable controls on the following activities given the risk to water quality:
- (a) Subdivision and development adjacent to waterways;
 - (b) Discharge to land activities associated with industry; and
 - (c) Activities in the bed and margins of waterways, including gravel extraction.

ACTIVITIES IN THE BEDS AND MARGINS OF RIVERS AND LAKES

Riparian areas

- WM12.2** To require the protection and restoration of native riparian vegetation along waterways and lakes in the takiwā as a matter of priority, and to ensure that this can occur as a permitted activity.

Use and enhancement of river margins in the built/ urban environment

- WM12.4** All waterways in the urban and built environment must have indigenous vegetated healthy, functioning riparian margins.

WM12.5 To require that all waterways in the urban and built environment have buffers or setback areas from residential, commercial, or other urban activity that are:

- (a) At least 10 metres, and up to 30 metres; and
- (b) Up to 50 metres where the space, such as towards river mouths and in greenfield areas.

WM12.6 In the urban environment, it is accepted that waterways may have existing exotic vegetation along margins (e.g. exotic specimen trees in waterside reserves). However, the objective is still to promote native riparian vegetation, as taonga valued for flood control, the maintenance of water quality, mahinga kai and cultural wellbeing.

Structures in the beds and margins of waterways

WM12.13 To require that any structure, essential or otherwise, in the bed or margin of a waterway (e.g. floodgate) supports and enables passage for migratory indigenous fish species and does not compromise any associated kōhanga.

WETLANDS, WAIPUNA AND RIPARIAN MARGINS

WM13.1 To recognise and protect all wetlands, waipuna and riparian areas as wāhi taonga that provide important cultural and environmental benefits, including but not limited to:

- (a) Mahinga kai habitat;
- (b) The provision of resources for cultural use;
- (c) Cultural well-being;
- (d) The maintenance and improvement of water quality; and
- (e) Natural flood protection.

WM13.2 To protect, restore, and enhance remaining wetlands, waipuna, and riparian areas by:

- (a) Maintaining accurate maps of existing wetlands, waipuna, and riparian margins;
- (b) Requiring that the drainage of existing wetlands or waipuna or the destruction or modification of existing native riparian areas be a prohibited activity;
- (c) Requiring the use of appropriate fencing, buffers, and setback area to protect wetlands, waipuna, and riparian areas from intensive land use, including stock access and irrigation;
- (d) Supporting initiatives to restore wetlands, waipuna, and riparian areas; and
- (e) Continuing to educate the wider community and landowners of the taonga value of these ecosystems.

Comment: *Water is a significant cultural resource that connects Ngāi Tahu to the landscape and the culture and traditions of the tūpuna. Wetlands, waipuna and riparian margins are taonga to Ngāi Tahu, providing rich sources of mahinga kai, and treasured for their natural ecosystem functions that protect and improve mauri.*

5.4 PAPATŪĀNUKU

SUBDIVISION AND DEVELOPMENT

Basic principles and guidelines

P4.3 To base tāngata whenua assessments and advice for subdivision and residential land development proposals on a series of principles and guidelines associated with key issues of importance concerning such activities, as per Ngāi Tahu subdivision and development guidelines.

STORMWATER

- P6.1** To require **on-site** solutions to stormwater management in all new urban, commercial, industrial, and rural developments (zero stormwater discharge off site) based on a multi-tiered approach to stormwater management:
- (a) Education- engaging greater general public awareness of stormwater and its interaction with the natural environment, encouraging them to take the steps to protect their local environment and perhaps re-use stormwater where appropriate;
 - (b) Reduce volume entering system - implementing measures that reduce the volume of stormwater requiring treatment (e.g. rainwater collection tanks);
 - (c) Reduce contaminants and sediments entering system – maximising opportunities to reduce contaminants entering stormwater e.g. oil collection pits in carparks, education of residents, treat the water, methods to improve quality; and
 - (d) Discharge to land-based methods, including swales, stormwater basins, retention basins, and constructed wet ponds and wetlands (environmental infrastructure), using appropriate native plant species, recognising the ability of particular species to absorb water and filter waste.
- P6.2** To oppose the use of existing natural waterways and wetlands, and drains, for the treatment and discharge of stormwater in both urban and rural environments.
- P6.3** Stormwater should not enter the wastewater reticulation system in existing urban environments.
- P6.4** To require that the incremental and cumulative effects of stormwater discharge are recognised and provided for in local authority planning and assessments.
- P6.6** To oppose the use of global consents for stormwater discharges.

DISCHARGE TO LAND

- P8.1** To require that discharge to land activities in the takiwā:
- (a) Are appropriate to the soil type and slope, and the assimilative capacity of the land on which the discharge activity occurs;
 - (b) Avoid over-saturation and therefore the contamination of soil, and/or run off and leaching; and
 - (c) Are accompanied by regular testing and monitoring of one or all of the following soil, foliage, groundwater, and surface water in the area.
- P8.2** In the event that the accumulation of contaminants in the soil is such that the mauri of the soil resource is compromised, then the discharge activity must change or cease as a matter of priority.

SOIL CONSERVATION

- P9.1** To sustain and safeguard the life supporting capacity of soils, mō tātou, ā, mō kā uri ā muri ake nei.
- P9.2** To require the appropriate valuation of soil resources as taonga and as natural capital, providing essential ecosystem services.
- P9.3** To protect the land from induced soil erosion as a result of unsustainable land use and development.

CONTAMINATED LAND

- P10.1** The management of contaminated land must recognise and provide for specific cultural issues, including:
- (a) The location of contaminated sites;
 - (b) The nature of the contamination;
 - (c) The potential for leaching and run-off;
 - (d) Proposed land-use changes; and
 - (e) Proposed remediation or mitigation work.
- P10.2** To require appropriate and meaningful information sharing between management agencies and tāngata whenua on issues associated with contaminated sites.

EARTHWORKS

- P11.1** To assess proposals for earthworks with particular regard to:
- (a) Potential effects on wāhi tapu and wāhi taonga, known and unknown;
 - (b) Potential effects on waterways, wetlands and waipuna;
 - (c) Potential effects on indigenous biodiversity;
 - (d) Potential effects on natural landforms and features, including ridge lines;
 - (e) Proposed erosion and sediment control measures; and
 - (f) Rehabilitation and remediation plans following earthworks.

Risk of damage of modification to sites of significance

- P11.2** To require that tāngata whenua are able to identify particular areas whereby earthworks activities are classified as a restricted discretionary activity, with Ngāi Tahu values as a matter of discretion.
- P11.3** To use the methods identified in Section 5.8 Policy CL4.6 (Wāhi tapu me wāhi taonga) where an earthworks activity is identified by tāngata whenua as having actual or potential adverse effects on known or unknown sites of significance.

Erosion and sediment control

- P11.9** To require stringent and enforceable controls on land use and earthworks activities as part of the resource consent process, to protect waterways and waterbodies from sedimentation, including but not limited to:
- (a) The use of buffer zones;
 - (b) Minimising the extent of land cleared and left bare at any given time; and
 - (c) Capture of run-off, and sediment control.

Comment: Land use and development activities in the takiwā must be managed in way that works with the land and not against it. Papatūānuku sustains the people, and the people must in turn ensure their actions do not compromise the life supporting capacity of the environment.

5.5 TĀNE MAHUTA

INDIGENOUS BIODIVERSITY

- TM2.2** To recognise Te Tiriti o Waitangi as the basis for the relationship between central and local government and tāngata whenua with regard to managing indigenous biodiversity, as per duty of active protection of Māori interests and the principle of partnership.

Integrating indigenous biodiversity into the landscape

- TM2.8** To require the integration of robust biodiversity objectives in urban, rural land use and planning, including but not limited to:
- (a) Indigenous species in shelter belts on farms;
 - (b) Use of indigenous plantings as buffers around activities such as silage pits, effluent ponds, oxidation ponds, and industrial sites;
 - (c) Use of indigenous species as street trees in residential developments, and in parks and reserves and other open space; and
 - (d) Establishment of planted indigenous riparian margins along waterways.

RESTORATION OF INDIGENOUS BIODIVERSITY

- TM3.1** To approach restoration of indigenous biodiversity in the takiwā based on the following principles:
- (a) Restoration of indigenous biodiversity is about restoring original and natural landscapes, and therefore the mauri of the land; and
 - (b) Restoration of indigenous biodiversity is about restoring the relationship of Ngāi Tahu to important places and resources; including planning for customary use.
- TM3.2** To advocate for an approach to restorations based on '*working with the land rather than against it*', including but not limited to:
- (a) Establishment of long term, intergenerational vision, and objectives (50 and 100 years ahead); and
 - (b) Use of natural succession and staged re-planting rather than spraying and burning (e.g. natural succession of indigenous species into areas of gorse and broom; staged underplanting of natives into wetland and lagoon areas full of willow).

Comment: *Ngāi Tahu has a particular interest in indigenous biodiversity, both for its inherent value on the landscape and the ecosystem services it provides, and with regard to mahinga kai. Protection and enhancement of indigenous biodiversity is of high importance to mana whenua.*

5.8 NGĀ TŪTOHU WHENUA

RECOGNISING CULTURAL LANDSCAPES

Recognising cultural landscapes

- CL1.1** To require that the local and central government recognise and provide for the ability of tāngata whenua to identify particular landscapes as significant cultural landscapes, reflecting:
- (a) Concentration, distribution, and nature of wāhi tapu and wāhi taonga;
 - (b) Setting within which sites occur and significance of setting;
 - (c) Significance with regard to association and relationship to place; and
 - (d) Degree of risk/ threat.
- CL1.4** To require that oral tradition and history is considered equally alongside documented evidence when determining the cultural landscape values associated with a particular area or site.

WĀHI TAPU ME WĀHI TAONGA

- CL3.1** All taonga within the takiwā of Ngāi Tahu, accidental discovery or otherwise, belong to the Papatipu Rūnanga/ Te Rūnanga o Ngāi Tahu.

Protecting wāhi tapu and wāhi taonga

CL3.8 To require, where a proposal is assessed by tāngata whenua as having the potential to affect wāhi tapu or wāhi taonga, one or more of the following:

- (a) Low risk to sites:
 - (i) Accidental discovery protocol (ADP).

Comment: *Ngā tūtohu whenua, or cultural landscapes, is a concept used to recognise areas and places of particular importance. As a planning tool, cultural landscapes are a culturally meaningful and effective framework for the identification, protection and management of sites and places of significance, the multiple values associated with those sites and places, and the relationship of tāngata whenua to them.*

6.11 TE WAIHORA

TE WAIHORA JOINT MANAGEMENT PLAN

TW3.1 To use the Te Waihora Joint Management Plan alongside the Mahaanui IMP to enable a holistic Ki Uta Ki Tai approach to resolving issues of significance for the Joint Management Area and the wider Te Waihora catchment.

CULTURAL HEALTH OF LOWLAND WATERWAYS AND GROUNDWATER

Water quality

TW7.1 To require that the restoration of water quality in lowland streams is addressed as a matter of priority in the takiwā, to enable Ngāi Tahu and the wider community to fish, swim and engage with our waterways as we once did.

WETLANDS, WAIPUNA AND RIPARIAN MARGINS

TW8.1 To require that the wāhi taonga status of wetlands, waipuna and riparian margins is recognised and provided for in the catchment, as per general policy on Wetlands, waipuna and riparian margins (Section 5.3 Issue WM13).

Comment: *Although Te Waihora continues to be a productive environment, its mauri is severely degraded as a result of a management regime that has consistently prioritised non-Ngāi Tahu values and interests. Land and water use in the catchment must respect the boundaries, availability and limits of our freshwater resources and the need to protect soil and water resources for future generations.*

4.1 Guidance to Moderate Impacts on Mana Whenua Values

The above policies from the Mahaanui Iwi Management Plan provide a framework for assessing the potential negative impacts of the proposed activity on Mana Whenua values and provide guidance on how these effects can be moderated.

Te Taumutu Rūnanga have a unique and abiding interest in the sustainable management of te taiao – the environment. Wai māori (freshwater) is a taonga of Ngāi Tahu, governed under the domain of rangatiratanga and defined by Ngāi Tahu tikanga and ritenga. Te Taumutu Rūnanga as tāngata whenua have customary rights and responsibilities associated with freshwater resources in the region, as expressed through the exercise of mana whenua, rangatiratanga, kaitiakitanga and manaakitanga, and as guaranteed by Te Tiriti o Waitangi. Ensuring that freshwater management recognises and

provides for these rights and interests is critical to enabling tāngata whenua to protect water as a taonga for future generations.

Opoira (Knights Stream) is a tributary to the Hurutini (Halswell) River, a culturally and environmentally significant waterway for kāinga nohoanga and mahinga kai, particularly for tuna (eels) and manu (birds). In te Ao Māori (the Māori worldview) and Mātauranga Māori (the intergenerational knowledge of Māori), the recognition of “Ki uta ki tai” is important. “Ki uta ki tai” or “from the mountains to the sea”, is an important guiding principal that recognises the interconnectedness of ecosystems, particularly of water, and emphasises that the whole catchment is connected - impacts are not limited to the tangible effects on the subject site but are experienced across the whenua. The quality of water in the lower reaches of the catchment and within Te Waihora is determined by the cumulative impacts of land use upstream and in the tributaries of the high catchment. It is therefore a key priority for Rūnanga that good water and land management practices are used at this site.

Te Taumutu kaitiaki have identified various mitigations to protect the mauri of the wai in Knights' Stream and wider ecosystem. Policy WM12.5 of the Mahaanui Iwi Management Plan outlines that all waterways in the urban and built environment must have buffers or set back areas from residential, commercial, or other urban activity that are at least 10 metres and up to 30 metres. In the pre-application advice, kaitiaki indicated that the setback margins should be at least 10 metres to align with the Mahaanui Iwi Management Plan. It seems that the minimum setback distance proposed by the applicant is 6 metres. In the substantive application, or by direct notice, could the applicant please clarify what the intended setbacks of development from the waterways on site will be and where they will breach the requested 10 metre setback. Regardless, this recommendation is retained, the applicant should ensure that these 10 metre setbacks are respected in the construction and operational phase by not conducting any earthworks nor creating any impervious surfaces within them.

In addition to setbacks, ensuring that stormwater is appropriately managed and treated is important to protecting the mauri of the soil and of the wai. Stormwater discharges have the potential to introduce contaminants into the receiving environment, leading to environmental degradation and contamination of natural resources. This does not align with the Kaitiakitanga aims and values and is culturally unacceptable. Stormwater should be treated before discharge, including a minimum of first flush treatment and heavy metal treatment. Stormwater from roofs particularly should be treated for heavy metals. Finally, the stormwater system should be designed to avoid discharge to Knights Stream.

Indigenous biodiversity, as well as the landscapes and ecosystems that support this biodiversity, are a fundamental part of the culture, identity and heritage of Ngāi Tahu. Indigenous vegetation provides a range of benefits such as increasing indigenous habitat throughout the takiwā, binding of soil, nutrient uptake, and carbon sequestration – all of which help support a healthy environment. Regardless of how robust the protection measure for te taiao are during this development, there will still be impacts on cultural and ecological values. Incorporating indigenous biodiversity throughout the development, particularly in riparian margins, can help to offset these impacts and increase the indigenous biodiversity landscape across Waitaha as a whole. The consent holder must retain and enhance all habitats with mature native vegetation; this has been identified around Knights Stream. Further plantings, both within and outside of the waterway setbacks are recommended to improve the

value of the site. Plantings within the banks of Knights stream should follow the recommendations set out in the ecological survey and all species chosen should be appropriate to the local environment and sourced from local seed supplies.

Outside of indigenous flora protection and restoration, the protection of any indigenous and taonga flora and fauna species which may be present on site is of high importance for Te Taumutu Rūnanga. In the pre-application feedback, Te Taumutu Rūnanga requested that a formal assessment be undertaken to identify any lizards, native birds, or ecological values associated with the site. It is noted from the applicant's updated information that further ecological assessments is required to confirm the presence of lizards and bats and that this will form part of the substantive application. Mahaanui, on behalf of Te Taumutu Rūnanga, therefore retain our comments that a formal ecological survey be prepared and that independent expert advice is sought based on the findings. If lizards are found and require translocation, the applicant should offset their impacts of removing ecological assets and existing habitat from this site by enhancing the new habitat.

Land use, subdivision and development activities must have appropriate controls to avoid over-saturation, contamination and erosion of soils. Erosion and sediment control is a key issue of concern with regard to earthworks. Activities such as residential land development can leave large areas of land cleared with bare soil exposed, increasing the risk of erosion and the discharge of sediment into waterways, harbours, estuaries, or the sea. An Erosion and Sediment Control Plan for any earthworks required to give effect to this development. If dewatering is required alongside earthworks, dewatered groundwater must be tested and treated to ensure the protection of indigenous/taonga species prior to discharge.

Any activity that involves ground disturbance has the potential to uncover cultural material or wāhi tapu. How this potential is managed is dependent on the level of risk identified by tāngata whenua. It is acknowledged that this site is within proximity of Kā ara Tūpuna. Mahaanui is not able to comment on specific location of any wahi tapu or wahi taonga (including koiwi) found in the area or adjacent to the site. As noted in the pre-application advice, it is not appropriate to use experience or consent conditions from an adjacent activity (i.e. State Highway 76 construction) to inform a new activity. The consent holder must ensure that an Accidental Discovery Protocol (as shown in Appendix 1) is in place during all earthworks and that all contractors are made familiar with this protocol as per policy CL3.8 in the Mahaanui IMP. If Heritage New Zealand Pouhere Taonga requires that the applicant obtain an Archaeological Authority, recommendation 6 has been provided.

Contaminated land can have adverse effects on the environment, including the potential for contaminants to leach into groundwater. Contaminated land can also have effects on Ngāi Tahu cultural associations. Contaminated sites or areas may be on, near or adjacent to land with mahinga kai, wāhi tapu or historical associations, which is the case for this site containing the Opoira stream. Measures must be taken to ensure protection of the mauri of the soil and waters on site and avoid potential contamination of the site in any way. We have seen that a Detailed Site Investigation is currently being progressed and will form part of the documentation required under the substantive application. This must be completed to determine whether any contamination is present on the site. Various recommendations have been provided in the case that soil contamination is confirmed (see recommendation 1 and 10-12). Measures to prevent further contamination, including spills of

hazardous substances must also be managed appropriately with the amount of construction that will occur on site.

Subdivision and development can have significant effects on tāngata whenua values, including sense of place, cultural identity, indigenous biodiversity, mahinga kai, and wāhi tapu and wāhi taonga, but can also present opportunities to enhance those values. The consent holder is encouraged to refer to the Ngāi Tahu subdivision and development guidelines for low impact methods. Low impact design solutions such as rain and greywater collection and re-use systems as an alternative to discharge to land systems are encouraged. Aligning stormwater treatment prior to discharge and disposal with best practice methods will have overall beneficial results to water quality and is highly encouraged.

5.0 Rūnanga – Affected Party or Not

In terms of this response, Mahaanui Kurataiao has taken a targeted approach and only addresses matters of fundamental concern to Te Taumutu Rūnanga. The fact that Mahaanui Kurataiao has not commented on any particular matter should not be taken as support thereof and Te Taumutu Rūnanga reserves the right to comment on additional matters at the substantive stage or at a hearing.

Te Taumutu Rūnanga are so far neutral to this application. They have identified various areas where the proposal may impact mana whenua values and would like to see these accounted for in draft consent conditions / be built into the proposed activity. The recommendations and feedback provided in Section 6.0 have been developed to align this proposal more closely with the provisions in the Mahaanui IMP.

6.0 Recommendations and Feedback

After reviewing the updated and formalised application information, Te Taumutu Rūnanga kaitiaki have assessed that many of their original recommendations and comments provided to the applicant in April 2026 remain relevant, they have been provided below. In addition to these recommendations, the following mitigation measures have arisen at this stage.

The following recommendations should be considered to moderate effects of this proposed activity on mana whenua values:

1. If contamination is found, soils that are contaminated to levels above environmental guidelines should be removed from site and disposed of at an appropriate facility, not re-mixed and replaced across the site.
2. The consent holder must retain and enhance all habitats with mature native vegetation, especially the Knights Stream riparian flora and the northern dispersal corridor along John Paterson Drive.
3. Improve the Knights stream ecosystem by planting indigenous riparian species along the banks. Include tussock sedge/pūrei, harakeke/flax, kowhai, and cabbage trees (*species recommended by the ecological survey based on bank characteristics*).

4. Stormwater from roofs should be treated, including for heavy metals. Methods can include sediment and contaminant traps, being directed to onsite swales or planted areas.
5. The stormwater system should be designed to avoid discharge to Knights Stream.
6. If an Archaeological Authority is required,
 - a. That a suitably qualified archaeologist approved by Heritage New Zealand Pouhere Taonga should be offered the opportunity to be onsite to monitor earthworks.
 - b. Should any previously unrecorded archaeological deposits be uncovered, all work will stop immediately to allow time for the appropriate recording and sampling of the deposit.
 - c. Should any taonga or kōiwi tangata be located all work will stop immediately and the appropriate procedure of notification must be followed as per Heritage New Zealand Pouhere Taonga guidelines and instruction from mandated Te Taumutu Rūnanga kaitiaki.
 - d. That any reports (i.e., archaeological assessments, geotechnical assessments, archaeological monitoring reports) be sent to Te Taumutu Rūnanga office and to the office Mahaanui Kurataiao Ltd.

Comment:

Could the applicant please detail clearly what the intended setback of development will be from the waterways on site and if there will be any construction within these setbacks?

Recommendations retained from pre-application feedback:

General and Earthworks:

7. An Accidental Discovery Protocol (ADP) should be in place during all earthworks required to exercise this consent to deal with archaeological finds and protect the interests of mana whenua. This condition does not constitute a response under the Heritage New Zealand Pouhere Taonga Act (HNZPT 2014).
8. An Erosion and Sediment Control Plan for any earthworks required to give effect to this consent should be prepared, implemented, inspected, and maintained in accordance with Environment Canterbury's *Erosion and Sediment Control Toolbox* for Canterbury until such time the site is stabilised.
 - a. Erosion and sediment control measures should effectively minimise sediment in stormwater discharged during the construction phase.
 - b. If the erosion and sediment controls prove to be inadequate, works should cease until appropriate and effective measures are in place.
9. Measures must be taken to avoid spills of fuel or any other hazardous substances within the site. These measures shall include:
 - a. Refuelling of machinery and vehicles must not occur within 20 metres of:
 - i. Open excavations;
 - ii. Exposed groundwater;
 - iii. Surface water bodies; or
 - iv. Stormwater devices.
 - b. Storing fuel securely or removing fuel from site overnight.

- c. A spill kit must be kept on site that is capable of absorbing the quantity of oil and petroleum products that may be spilt on site at any one time, remains on site at all times.
 - d. In the event of a spill of fuel or any other hazardous substance, the spill must be cleaned up as soon as practicable, the area must be inspected and cleaned, and measures taken to prevent a recurrence.
10. A Detailed Site Investigation (DSI) is required to confirm whether the earthworks will be conducted on contaminated land. If contaminated soil is present based on the DSI, a Site Management Plan must be devised, implemented, and monitored by a suitably qualified and experienced person for all remedial works.

If contamination is found:

- 11. All contaminated soil must be removed and not left insitu.
- 12. A Site Management Plan must be devised, implemented and managed by a suitably qualified and experienced person to ensure any contaminated material onsite is managed safely and does not migrate into the environment.

Incorporating indigenous biodiversity:

- 13. Indigenous planting is required to enhance the cultural landscape, increase indigenous habitat, filter sediment and sequester carbon.
 - a. Riparian planting should enhance ecological values of the waterway
 - b. Plants that mature to a height of at least the width of the waterways should be provided.
- 14. Indigenous plants should be incorporated into development plans, consistent with the restoration and enhancement of indigenous biodiversity on the landscape.
 - a. For example, indigenous species should be used for street trees, open space and reserves, ground cover for swales, stormwater management network, and home gardens.
- 15. Indigenous species used in planting and landscaping should be appropriate to the local environment and sourced from local seed supplies.

Ecology:

- 16. If dewatering is required, dewatered groundwater must be tested and treated to ensure the protection of indigenous/taonga species prior to discharge.
- 17. A site survey for indigenous flora and fauna (taonga species including lizards, birds etc) must be undertaken prior to construction.
 - a. If these species are present on the site, the applicant must engage an independent expert for advice and if necessary, a relocation plan must be developed and new habitats enhanced by the applicant.
- 18. A minimum setback of 10m from all waterways must be adhered to for all construction and development on site.
- 19. The consent holder must not create new impervious surfaces within the waterway setback of 10m along Knights Stream.

Subdivision and Development:

20. The consent holder should incorporate the *Ngāi Tahu Subdivision and Development Guidelines* to the greatest practical extent. The site should incorporate sustainable urban design features with respect to stormwater runoff and greywater reuse including:

- a. Greywater capture and reuse.
- b. Rainwater capture and reuse (i.e., rainwater collection tanks).
- c. Minimising impervious cover (e.g., using permeable paving and maintaining grass cover).
- d. The use of rain gardens and swales (or other land-based methods) planted with appropriate native species, rather than standard curb and channel.
- e. Avoiding the use of building material known to generate contaminants such as copper guttering and roofing.

Stormwater:

21. Stormwater from the site should be treated before discharge, including a minimum of first flush treatment and heavy metal treatment.

Comments:

- Kaitiaki would like to see ground truthing of the setback margins mentioned in the feedback and have indicated that the setback margins are not enough for this location. These should be at least 10 m.
- Kā ara Tūpuna indicates a vague location of historical trade and transport pathways and Te Taumutu Rūnanga note that an ADP is sufficient for this area. Kaitiaki have noted that the design of the development could reflect Kā ara Tūpuna.

Please refer to section 4.1 for further information.

On behalf of Mahaanui Kurataiao Ltd, this report has been prepared by Grace King | Mahaanui Kurataiao Ltd Pou Taiao, and peer reviewed by Angela Burton | Mahaanui Kurataiao Ltd Pou Arataki - Mātārauemi.

Date: 13 July 2026

Appendix 1: Accidental Discovery Protocol (ADP)

PRIOR TO COMMENCEMENT OF ANY WORKS, A COPY OF THIS ADP SHOULD BE MADE AVAILABLE TO ALL CONTRACTORS WORKING ON SITE.

Purpose

This Accidental Discovery Protocol (ADP) sets out the procedures that must be followed in the event that taonga (Māori artefacts), burial sites/kōiwi (human remains), or Māori archaeological sites are accidentally discovered. The Protocol is provided by Te Taumutu Rūnanga. Te Taumutu Rūnanga is the representative body of the tangata whenua who hold mana whenua in the proposed area.

Background

Land use activities involving earthworks have the potential to disturb material of cultural significance to tangata whenua. In all cases such material will be a taonga, and in some cases such material will also be tapu. Accidental discoveries may be indicators of additional sites in the area. They require appropriate care and protection, including being retrieved and handled with the correct Māori tikanga (protocol).

Under the *Heritage New Zealand Pouhere Taonga Act 2014*, an archaeological site is defined as any place associated with pre-1900 human activity, where there is material evidence relating to the history of New Zealand. It is unlawful for any person to destroy, damage or modify the whole or any part of an archaeological site (known or unknown) without the prior authority of the Heritage New Zealand Pouhere Taonga (HNZPT). This is the case regardless of the legal status of the land on which the site is located, whether the activity is permitted under the District or Regional Plan or whether a resource or building consent has been granted. The HNZPT is the statutory authority for archaeology in New Zealand.

Note that this ADP does not fulfil legal obligations under the Heritage New Zealand Pouhere Taonga Act 2014 regarding non-Māori archaeology. Please contact the HNZPT for further advice.

Immediately following the discovery of material suspected to be a taonga, kōiwi or Māori archaeological site, the following steps shall be taken:

1. All work on the site will cease immediately.
2. Immediate steps will be taken to secure the site to ensure the archaeological material is not further disturbed.
3. The contractor/works supervisor/owner will notify the Kaitiaki Rūnanga and the Area Archaeologist of the HNZPT. In the case of kōiwi (human remains), the New Zealand Police must be notified.
4. The Kaitiaki Rūnanga and HNZPT will jointly appoint/advise a qualified archaeologist who will confirm the nature of the accidentally discovered material.

5. If the material is confirmed as being archaeological, the contractor/works supervisor/owner will ensure that an archaeological assessment is carried out by a qualified archaeologist, and if appropriate, an archaeological authority is obtained from HNZPT before work resumes (as per the *Heritage New Zealand Pouhere Taonga Act 2014*).
6. The contractor/works supervisor/owner will also consult the Kaitiaki Rūnanga on any matters of tikanga (protocol) that are required in relation to the discovery and prior to the commencement of any investigation.
7. If kōiwi (human remains) are uncovered, in addition to the steps above, the area must be treated with utmost discretion and respect, and the kōiwi dealt with according to both law and tikanga, as guided by the Kaitiaki Rūnanga.
8. Works in the site area shall not recommence until authorised by the Kaitiaki Rūnanga, the HNZPT (and the NZ Police in the case of kōiwi) and any other authority with statutory responsibility, to ensure that all statutory and cultural requirements have been met.
9. All parties will work towards work recommencing in the shortest possible time frame while ensuring that any archaeological sites discovered are protected until as much information as practicable is gained and a decision regarding their appropriate management is made, including obtaining an archaeological authority under the *Heritage New Zealand Pouhere Taonga Act 2014* if necessary. Appropriate management may include recording or removal of archaeological material.
10. Although bound to uphold the requirements of the Protected Objects Act 1975, the contractor/works supervisor/owner recognises the relationship between Ngāi Tahu whānui, including its Kaitiaki Rūnanga, and any taonga (Māori artefacts) that may be discovered.

IN DOUBT, STOP AND ASK; TAKE A PHOTO AND SEND IT TO THE HNZPT ARCHAEOLOGIST

Contact Details

HNZPT Archaeologist: (03) 357 9615 archaeologistcw@heritage.org.nz

HNZPT Southern Regional Office (03) 357 9629 infosouthern@heritage.org.nz

HNZPT Māori Heritage Advisor (03) 357 9620 pouarahisouth@heritage.org.nz

Kaitiaki Rūnanga:

Te Taumutu Rūnanga: 03 371 2660, taumutu@ngaitahu.iwi.nz

Appendix 2: Ngāi Tahu Subdivision and Development Guidelines

Note: These guidelines are to be read in conjunction with Policies P4.1, P4.2 and P4.3 within the Mahaanui IMP.

Cultural landscapes

- 1.1 A cultural landscape approach is the most appropriate means to identify, assess and manage the potential effects of subdivision and development on cultural values and significant sites [refer Section 5.8 Issue CL1].
- 1.2 Subdivision and development that may impact on sites of significance is subject Ngāi Tahu policy on Wāhi tapu me wāhi taonga and Silent Files (Section 5.8, Issues CL3 and CL4).
- 1.3 Subdivision and development can provide opportunities to recognise Ngāi Tahu culture, history and identity associated with specific places, and affirm connections between tāngata whenua and place, including but not limited to:
 - (i) Protecting and enhancing sites of cultural value, including waterways;
 - (ii) Using traditional Ngāi Tahu names for street and neighbourhood names, or name for developments;
 - (iii) Use of indigenous species as street trees, in open space and reserves;
 - (iv) Landscaping design that reflects cultural perspectives, ideas, and materials;
 - (v) Inclusion of interpretation materials, communicating the history and significance of places, resources, and names to tāngata whenua; and
 - (vi) Use of tāngata whenua inspired and designed artwork and structures.

Stormwater

- 2.1 All new developments must have on-site solutions to stormwater management (i.e. zero stormwater discharge off site), based on a multi-tiered approach to stormwater management that utilises the natural ability of Papatūānuku to filter and cleanse stormwater and avoids the discharge of contaminated stormwater to water [refer to Section 5.4, Policy P6.1].
- 2.2 Stormwater swales, wetlands and retention basins are appropriate land-based stormwater management options. These must be planted with native species (not left as grass) that are appropriate to the specific use, recognising the ability of particular species to absorb water and filter waste.

- 2.3** Stormwater management systems can be designed to provide for multiple uses. For example, stormwater management infrastructure as part of an open space network can provide amenity values, recreation, habitat for species that were once present on the site, and customary use.
- 2.4** Appropriate and effective measures must be identified and implemented to manage stormwater run-off during the construction phase, given the high sediment loads that stormwater may carry as a result of vegetation clearance and bare land.
- 2.5** Councils should require the upgrade and integration of existing stormwater discharges as part of stormwater management on land rezoned for development.
- 2.6** Developers should strive to enhance existing water quality standards in the catchment downstream of developments, through improved stormwater management.

Earthworks

- 3.1** Earthworks associated with subdivision and development are subject to the general policy on Earthworks (Section 5.4 Issue P11) and Wāhi tapu me wāhi taonga (Section 5.8, Issue CL3), including the specific methods used in high and low risk scenarios for accidental finds and damage to sites of significance.
- 3.2** The area of land cleared and left bare at any time during development should be kept to a minimum to reduce erosion, minimise stormwater run-off and protect waterways from sedimentation.
- 3.3** Earthworks should not modify or damage beds and margins of waterways, except where such activity is for the purpose of naturalisation or enhancement.
- 3.4** Excess soil from sites should be used as much as possible on site, as opposed to moving it off site. Excess soil can be used to create relief in reserves or buffer zones.

Water supply and use

- 4.1** New developments should incorporate measures to minimise pressure on existing water resources, community water supplies and infrastructure, including incentives or requirements for:
- (i) low water use appliances and low flush toilets;
 - (ii) grey water recycling; and
 - (iii) rainwater collection.
- 4.2** Where residential land development is proposed for an area with existing community water supply or infrastructure, the existing supply or infrastructure must be proven to be able to accommodate the increased population prior to the granting of subdivision consent.

- 4.3** Developments must recognise, and work to, existing limits on water supply. For example, where water supply is an issue, all new dwellings should be required to install rainwater collection systems.

Waste treatment and disposal

- 5.1** Developments should implement measures to reduce the volume of waste created within the development, including but not limited incentives or requirements for:

- (i) Low water use appliances and low flush toilets;
- (i) Grey water recycling; and
- (ii) Recycling and composting opportunities (e.g. supporting zero waste principles).

- 5.2** Where a development is proposed for an area with existing wastewater infrastructure, the infrastructure must be proven to be able to accommodate the increased population prior to the granting of the subdivision consent.

- 5.3** New rural residential or lifestyle block developments should connect to a reticulated sewage network if available.

- 5.4** Where new wastewater infrastructure is required for a development:

- (i) The preference is for community reticulated systems with local treatment and land-based discharge rather than individual septic tanks; and
- (ii) Where individual septic tanks are used, the preference is a wastewater treatment system rather than septic tanks.

Design guidelines

- 6.1** New developments should incorporate low impact urban design and sustainability options to reduce the development footprint on existing infrastructure and the environment, including sustainable housing design and low impact and self-sufficient solutions for water, waste, energy such as:

- (i) Position of houses to maximise passive solar gain;
- (ii) Rainwater collection and greywater recycling;
- (iii) Low energy and water use appliances;
- (iv) Insulation and double glazing; and
- (v) Use of solar energy generation for hot water.

- 6.2** Developers should provide incentives for homeowners to adopt sustainability and self-sufficient solutions as per 6.1 above.
- 6.3** Urban and landscape design should encourage and support a sense of community within developments, including the position of houses, appropriately designed fencing, sufficient open spaces, and provisions for community gardens.
- 6.4** Show homes within residential land developments can be used to showcase solar hot water, greywater recycling and other sustainability options, and raise the profile of low impact urban design options.

Landscaping and open space

- 7.1** Sufficient open space is essential to community and cultural wellbeing, and the realization of indigenous biodiversity objectives, and effective stormwater management.
- 7.2** Indigenous biodiversity objectives should be incorporated into development plans, consistent with the restoration and enhancement of indigenous biodiversity on the landscape.
- 7.3** Indigenous biodiversity objectives to include provisions to use indigenous species for:
- (i) street trees;
 - (ii) open space and reserves;
 - (iii) native ground cover species for swales;
 - (iv) stormwater management network; and
 - (v) home gardens.
- 7.4** Indigenous species used in planting and landscaping should be appropriate to the local environment, and where possible from locally sourced seed supplies.
- 7.5** Options and opportunities to incorporate cultural and/or mahinga kai themed gardens in open and reserve space can be considered in development planning (e.g. pā harakeke as a source of weaving materials; reserves planted with tree species such as mātai, kahikatea and tōtara could be established with the long-term view of having mature trees available for customary use).
- 7.6** Developers should offer incentives for homeowners to use native species in gardens, including the provision of lists of recommended plants to avoid, discounts at local nursery, and landscaping ideas using native species.



TO: ENVIRONMENTAL PROTECTION AGENCY
RE: JOHN PATERSON ESTATES - REFERRAL APPLICATION UNDER THE FAST-TRACK APPROVALS ACT 2024 ((FTAA-2605-1235))
DATE: 13 JULY 2026

INTRODUCTION

Ngāi Tūāhuriri is a principal hapū of Ngāi Tahu, acknowledged in Te Rūnanga o Ngāi Tahu Act 1996 and the Ngāi Tahu Claims Settlement Act 1998 (Settlement Act). The takiwā of the hapū is centered at Tuahiwi, and extends from Hurunui to Hakatere, sharing an interest with Arowhenua Rūnanga northwards to Rakaia, and thence inland to the Main Divide. This is articulated in, and discernible from, the Te Rūnanga o Ngāi Tahu (Declaration of Membership) Order 2001 (formerly Schedule 1 of the Te Rūnanga o Ngāi Tahu Act 1996). Within this area, Ngāi Tūāhuriri has maintained noho tūturu (ahi kā), meaning the tribe's 'fires' have been kept burning and that they actively exercise rangatiratanga.

Ngāi Tūāhuriri Rūnanga has mandated Whitiora Centre Limited (Whitiora) to provide advice act on its behalf in respect of environmental policy, planning, and strategy matters. This includes proposals being referred to or processed as a substantive application under the Fast-track Approvals Act 2024 (FTAA). Accordingly, all comments made in this document can be read as from both Whitiora and Ngāi Tūāhuriri Rūnanga.

Please find set out below our comments.

BACKGROUND

The John Paterson Estates project (the project) lies within the takiwā of Ngāi Tūāhuriri.

The proposed project is comprised of the following:

- The proposal will establish approximately 510 residential units.
- Four existing houses on the application site will be removed and replaced on larger lots.
- A new reserve and enhanced riparian margin along the Stream.



- The proposal incorporates an integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve and stormwater basins with associated wetland areas.
- A future onsite pump station.

Whitiora was notified of the applicant's intention to lodge a referral application under the FTAA on 16 April 2026. Whitiora then received an invitation to comment on the project from the EPA on 19 June 2026.

MATTERS ARISING FROM THE NGAĪ TAHU SETTLEMENT

The Ngāi Tahu Claims Settlement Act 1998 (NTCSA) records the scope, detail, and nature of the Crown's settlement with Ngāi Tahu. These matters included:

- An apology
- The return of Aoraki to Ngāi Tahu
- A wide range of mechanisms for economic redress
- A wide range of mechanisms for recognition of mana
- Recognition of, and provision for mahinga kai

The Apology

The Crown's apology recognised its repeated breaches of the principles of the Treaty of Waitangi in its purchases of Ngāi Tahu land. This included acknowledgement that the Crown had failed to "preserve and protect Ngāi Tahu's use and ownership of such land and valued possessions and interests which it wished to retain; as well as "past failures to acknowledge Ngāi Tahu rangatiratanga within the South Island lands within its boundaries."¹

Within the apology, the Crown recognises Ngāi Tahu as the tāngata whenua of the South Island, including rangatiratanga within, the Takiwā of Ngāi Tahu Whānui. The apology also includes a commitment to enter a new age of co-operation with Ngāi Tahu.

¹ S6 Ngāi Tahu Claims Settlement Act 1998



Mechanisms for Recognition of Mana

The importance of Te Waihora to Ngāi Tahu is recognised in the NTCSA. The Act provides for the vesting of the lakebed in Te Rūnanga o Ngāi Tahu as redress for the loss of mahinga kai.

The Mahaanui Iwi Management Plan² describes Te Waihora as a tribal taonga representing a major mahinga kai and an important source of mana. For over 170 years, the effects of land use change and intensification within the lake's catchment have resulted in its decline. It is now considered to be one of the most polluted bodies of water in New Zealand.

Policy in the Mahaanui Iwi Management³ requires that the management of land and water within the Te Waihora catchment recognises and provides for the cultural health of Te Waihora. John Paterson Estate is within the catchment of Te Waihora, and every effort should therefore be made to ensure that the urban use of this land does not adversely and cumulatively contribute to further degradation of the lake.

Special Association with Taonga Species

The NTCSA also acknowledges the cultural, spiritual, historic, and traditional association of Ngāi Tahu with taonga species which are identified in Schedule 97 of the Act.

Relevance to the Proposed Subdivision

Matters arising from the Ngāi Tahu Settlement that concern the proposed subdivision include:

- a. Management of construction and operational stormwater to ensure that the quality of effluent which is being treated and then transported via ground and surface waterbodies does not contribute to the existing and cumulative degradation of Te Waihora.
- b. Where appropriate, to integrate and provide taonga species within the design of the subdivision as part of landscape treatment and within water races, habitat for native fish and birds.

² Mahaanui Iwi Management Plan, Chapter 6.11, p. 11.

³ Mahaanui Iwi Management Plan, Policy TW4.1.



COMMENTS ON APPLICATION

Overview

The proposed land is not subject to any cultural overlays. An ara tāwhito cuts through the north-west corner of the site. These are historic trails used to access mahinga kai and resources and connect pā and hapū across the island. Its presence indicates that the site forms part of a wider cultural landscape.

The site is within the Hurutini/Halswell catchment. This river is a significant tributary of Te Waihora/Lake Ellesmere, a major mahinga kai site and tribal taonga⁴. Sewage and stormwater disposal associated with urban subdivision, along with poor drain and waterway management has contributed to the degradation of water within this catchment⁵. Policy 1.1 in Chapter 5.4 Papatūānuku of the Mahaanui Iwi Management Plan promotes land use to recognise and provide for natural resource capacity, capability, availability, and limits, the assimilative capacity of catchments.

The proposed land development triggers matters of interest and concern to Ngāi Tūāhuriri Rūnanga. These include the following:

- The management of earthworks including:
 - o Run-off from exposed earthworks into waterways causing contaminants to enter the waterway;
 - o Dust nuisance;
 - o Accidental discovery of Māori artefacts or sites of pre-European origin.
- The availability and efficient use of water .
- Reticulation of wastewater.
- Protection of surface waterbodies and the habitat they provide for fish and
- The use of indigenous and taonga species as part of landscape treatment
- Protection of springheads.
- Protection and enhancement of mahinga kai.
- The management of construction and operational storm

⁴ Chapter 6.11 Te Waihora, Mahaanui Iwi Management Plan

⁵ Chapter 6.11, Te Waihora, Cultural Health of Lower Hutt Catchment, Waihora, Mahaanui Iwi Management Plan, page 333



In addition, we emphasise that the preferred approach to land management in the takiwā requires taking an intergenerational view of the environment alongside the capacity of natural resources to absorb the development, having regard to cumulative effects within the catchment.⁶

Ngāi Tūāhuriri supports an approach to land development that is informed by, and responds to, the presence of surface and ground water bodies, biodiversity, retention of trees, retention of springs and the retention of natural landforms, all of which contribute to environmental quality and preserve the physical distinctiveness of specific locations. The proposed reserve adjoining Knights Stream is therefore supported.

Three Waters

It is understood that water supply and wastewater will be connected to reticulated services. This is supported. Whitiōra notes that a new wastewater pump station is proposed to be installed, and all wastewaters would need to be pumped under Knights Stream. Whitiōra expects that works under and within the Knights Stream corridor will be undertaken in accordance with a methodology that ensures that there are no adverse effects on stream geomorphology, ecosystems or water quality; with any restoration works ensuring a high level of environmental outcomes.

With respect to stormwater management, the applicant proposes a first-flush basin and wetland treatment system, with treated stormwater ultimately discharging to Knights Stream. These will be designed in accordance with the Christchurch City Council Waterways, Wetland, and Drainage Guide. The applicant intends to utilise Christchurch City Council's global stormwater consent (CRC252424). Ngāi Tūāhuriri expects that the quality of any stormwater discharge to Knights Stream reflects a state of improved water quality, or as a bare minimum there is no further or cumulative environmental degradation within the catchment.

In addition, investigations are underway to assess the feasibility of discharging stormwater directly to the ground. Diverting roof runoff to land will reduce the size of the stormwater treatment and storage facility. It will also reduce the volume of stormwater discharged to Knights Stream. Ngāi Tūāhuriri generally prefers the discharge of stormwater to water rather than direct discharge to water and supports the investigations being undertaken to explore opportunities for incorporating land-based stormwater disposal within the catchment.

⁶ Mahaanui Iwi Management Plan, 2013, Chapter 10: Environmental Management/ Kaupapa/Policy P1.1.



Whitiora is concerned with the release of copper and zinc from roofs; and requests clarification from the applicant that materials containing these elements will not be permitted within the development through the use of covenants.

Surface Water

Knights Stream is present along a portion of the southern and southeastern boundary of the proposed site. Knights Stream is a tributary of the Huritini-Halswell River, which is a significant tributary of Te Waihora /Lake Ellesmere. Every effort must be made to ensure that the quality of water discharged from the site will contribute to the achievement of improved water quality from the wider catchment. In this context, Whitiora expects that the fast-track approval will ensure there is an appropriate monitoring regime imposed to ensure that water quality standards will be met. This includes surface water monitoring for copper, lead, zinc, dissolved inorganic nitrogen, dissolved reactive phosphorous and total suspended solids. Soil sampling of the stormwater treatment basins for contaminants would also inform the effectiveness of the stormwater treatment system.

The applicant is proposing a new reserve and enhanced riparian margin adjacent to Knights Stream. Whitiora considers greenfield subdivisions as the optimal time to ensure that the site layout provides for the health of waterbodies - with appropriate setbacks on both sides of the surface water body and riparian planting, secured via a legal mechanism such as a reserve or easement. The new reserve and enhanced riparian margin adjacent to Knights Stream is supported.

The ecological report provided identified several taonga species present on the property. Taonga and mahinga kai species present on site must be protected and enhanced.

Landscape Planting

The intensity of residential development requires significant planting, maintenance, and protection of greenspaces. Whitiora considers it necessary to mitigate sediment and contaminated run-off from increased hard surfacing on waterways.



The proposal includes several green links, a recreation reserve and stormwater management area (SMA) with wetlands. Planting with indigenous mahinga kai and taonga species is encouraged. Planting that is designed to improve water quality outcomes is also encouraged. All planting must be implemented in full and maintained to ensure success.

Spatial Planning

On behalf of Ngāi Tūāhuriri, Whitiora raises a concern at the number of Fast-track residential subdivisions proposed in this part of Canterbury which are located outside of areas of planned growth. It is unclear how these independent subdivisions contribute to the achievement of positive community outcomes without strategic planning of transport requirements, cumulative stormwater impacts and in the absence of the necessary social, health and educational services of these communities. Whilst each proposal may be independently assessed against urban growth policies – there doesn't appear to be any requirement to consider the cumulative effects.

Summary and Conditions of Consent

The applicant has provided information to demonstrate that the project will be undertaken in accordance with best practice as a site specific development. Whitiora expects that these matters will be enforced through conditions of consent addressing the following matters:

- best practice erosion and sediment control during earthworks;
- best practice measures for dust management during earthworks;
- an Accidental Discovery Protocol during earthworks;
- implementation of an ecological management plan for the transfer of fish;
- implementation of best practice for fish passage;
- implementation of landscape planting incorporating indigenous species;
- implementation of best practice methods for stormwater management;
- connection to reticulated networks for water supply and wastewater;
- implementation of green spaces, reserves and planting as directed by the Council.

Whitiora seeks further information on conditions for monitoring and who will be responsible for monitoring and adaptive management. The information identifies water quality issues.



Further information is also required on how the development will be supported by essential services, such as schooling, healthcare facilities, and public transport.

CONTACT DETAILS

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