APPENDIX 3 RECORD OF CONSULTATION WITH CANTERBURY REGIONAL COUNCIL

Canterbury Regional Council			
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Pre-Application Advice for Carter Group – RMA252504

Disclaimer: This technical advice note does not constitute legal advice and should not be relied upon as such. Please note this preliminary advice has been given prior to any official guidance from the Ministry for the Environment relating to CRC's role under the Fast-Track Approvals Act 2024.

Meeting Date:	15 May 2025

Executive Summary

Carter Group Limited (Carter Group) (the applicant) have sought a second meeting with Canterbury Regional Council (CRC) to discuss the Ōhoka Residential Subdivision, listed in Schedule 2 of the Fast-Track Approval Act (FTAA). The proposal involves subdividing land and developing approximately 850 residential dwellings, a commercial or mixed-use centre, and a polo field, and enable potential development of a school, retirement village, or both, between Mill Road and Bradleys Road, Ōhoka, Waimakariri.

CRC Staff – Anna Stewart, Nardia Feehan and David Sluter (Consent Planning),
Carter Group – Tim Carter and Bruce Van Duyn (Carter Group) and Jono Begg and Pia Jackson (Inovo Group)

Introduction

Fast-Track Act Consenting:

Under the Act, the applicant is required under section 11(1)(a) to consult with relevant local authorities. Carter Group will need to provide evidence of this consultation as part of their application.

This pre-application meeting forms part of this consultation and discusses the process going forward for any potential applications by Carter Group under the FTAA.

Ōhoka Residential Subdivision Project:

The applicant requested a pre-app meeting to discuss the proposed Fast-Track application. Specifically, the applicant sought advice relating to:

- Water – activities involve community water takes, and construction related takes. Some operational takes may be required (TBC)
- Discharge – Construction and operation phase stormwater
- Land use – Earthworks to undertake subdivision

NES-F

- Removal of wetlands will be prohibited if rural zone

Minutes – Notes – Advice

- Working through specific subdivision detail for looking to have eight main stages, separated by the main road and the three water ways.
- A construction phase discharge consent will be required for each stage, ideally looking to bundle these rather than having eight separate consents.
- A consumptive groundwater take would be prohibited if over allocated (confirmation that the Eyre GW allocation zone is not currently fully allocated at 97%),
- Discussions around consumptive and non-consumptive takes in relation to construction related activities.
- Planning the permanent realignment of the Southern Stream which will result in the loss of extent. Also looking to do works to deepen these streams and remove three farm drains.
- Undertaking water supply assessment to ensure it reflects the subdivision stages.
- Looking to ensure wetland SMA's are 'wetted' year round but unclear on rules regarding consumptive use in this regard.
- Currently there are two big irrigation takes for this property. Looking to hold onto these for subdivision as combined community use and irrigation but surrender the surplus.
- Need to assess change from just irrigation to construction use, potential wetland top up and community use (permitted). Likely will need to surrender and submit new consent.
- Overall there will be less water use, especially once construction complete.
- Looking at 3 or 4 bores for the community water takes, coming online at different times as subdivision progresses. CRC to check if this can be done under the one consent.
- Ohoka Stream surface waterbody is overallocated so will not be used as a water supply.
- Will update section 30 request again immediately prior to lodging.
- Reminder that if other water takes are greater than 5 l/s then they will need to be metered.
- For FTAA will need to consider effects as a whole rather than just individual stages.
- Also a question on how the consents would work in terms of numbering and again whether they can be bundled. This relates to development and construction methodology, tackling the development area-by-area, working progressively through the site over time.
- CRC will be asked to comment on policies around urban development in the NPS and RPS so suggested that applicant address these.
- Also complete rules assessment including dust and stockpiling.
- A note on the importance of consultation as again CRC will be asked if this has occurred.
- CRC will also be asked to comment on infrastructure servicing at a policy level; applicant stated that servicing plans have all been drawn up.
- The applicant is awaiting decisions around re-zoning under the Waimakariri District Plan review (where they sought the site to be re-zoned from 'Rural' to 'Settlement'. Under the NES-F the removal of a wetland in a rural zone is prohibited. If re-zoning is not approved, what this means in terms of the NES-F application will need to be worked through.
- District plan zone may change rules and RPS assessment.
- Consulting with local runanga as well as Ngai Tahu.

- The application will be a joint process with Inovo covering regional consenting matters and Novo Group covering the district aspects and leading the FTAA application drafting.

ACTION – Applicant to send CRC rules assessment to check – particularly around stormwater and consumptive water takes.

ACTION – CRC to investigate water take – allocation status, change of use and how to stage for both takes and discharges.

ACTION – David to draft up minutes and send through for review.

Additional Information

Charging: Continue to charge time to the pre-app code RMA252504.
Process: Applicant to continue to prepare substantive application for FTAA.
Communication (going forward): Via email between David and Narida at CRC and Jono (Inovo).
Timelines for pre/ referral and substantive notification: Asap following plan change decision.

Signed by

Nardia Feehan
Principal Consent Planner

David Sluter
Senior Consents Planner - Project Management Officer

Pre-Application Advice for Ōhoka Residential Development, Carter Group – RMA252504

Disclaimer: This technical advice note does not constitute legal advice and should not be relied upon as such. Please note this preliminary advice has been given prior to any official guidance from the Ministry for the Environment relating to CRC's role under the Fast-Track Approvals Act 2024.

Carter Group Limited (Carter Group) (the applicant) have been consulting with Canterbury Regional Council regarding their fast-track application for the Ōhoka Residential subdivision. The proposal is to subdivide land and develop approximately 850 residential dwellings, a commercial or mixed-use centre, and a polo field, and enable the potential development of a school or retirement village (or both). The projects consists of 152 hectares at 511, 531, 535, and 547 Mill Road and 290 and 344 Bradleys Road, Ōhoka, Waimakariri and is listed in Schedule 2 of the FTAA.

Fast-Track Act Consenting:
Under the FTAA, the applicant is required under section 11(1)(a) to consult with relevant local authorities. Carter Group will need to provide evidence of this consultation as part of their application. Canterbury Regional Council are happy for this document to be used as evidence of consultation.

Based on the information we have been provided with as of the date of this advice, Canterbury Regional Council staff have raised the following concerns regarding this proposal:

<u>Planning – Victoria Watt</u>

- Infrastructure Costs and Inefficiencies – Relevant Policies: CRPS 6.2.1, 6.2.4, 6.3.5; NPS-UD Policy 1:
    - Higher cost per dwelling: Infrastructure (roads, water, wastewater, stormwater) must be extended to new, unplanned locations, significantly increasing the per-dwelling cost compared to development in existing or planned areas.
    - Funding gaps: The district council essentially cannot afford to upgrade the existing infrastructure because of the unplanned development as

infrastructure funding is aligned with planned growth areas. As such, the cost will fall on the developer.
    - Duplication of networks: There is a risk of duplicating networks (e.g. pumping stations or road access) that would not be required under a consolidated development pattern, increasing long-term maintenance liabilities for councils or ratepayers.
- Pressure on Transport Systems – Relevant Policies: CRPS 6.2.4, 6.3.4:
    - Increased car dependency: Development in areas not serviced by public transport increases reliance on private vehicles, adding to road congestion and emissions.
    - Wasted investment: Public transport and cycling infrastructure investments are concentrated in urban centres and planned growth areas. Development outside these zones reduces potential uptake, decreasing cost-effectiveness of existing infrastructure.
- Loss of Productive Rural Land – Relevant Policies: CRPS 5.3.12, 15.3.1:
    - Permanent reduction in rural economic capacity: Once converted to housing, land used for agriculture or horticulture cannot easily return to productive use, reducing Canterbury's rural economy base.
    - Soil degradation: Development leads to compaction, contamination, and topsoil loss, reducing future land versatility and limiting ecosystem functions (e.g. drainage, nutrient cycling).
- Uncoordinated Growth Risks – Relevant Policies: CRPS 5.3.1, 6.3.1, 6.3.12:
    - Increased service delivery costs: Emergency services, waste collection, school transport, and other services cost more per household when spread across unplanned or isolated developments.
    - Inequitable outcomes: Cost burdens may fall on councils or existing residents if the development proceeds without full funding of infrastructure and servicing upgrades.
    - While fast-track consenting limits the weight of strategic policy misalignment alone, the practical impacts of ignoring the RPS and NPS-UD are significant. This includes avoidable infrastructure costs, increased transport-related emissions, and loss of productive land — all of which have real financial and environmental consequences for the region.

Compliance – Georgia Simmonds

- Site Management Plan (SMP) provided 14/7/25:
  - The site description doesn't mention wetlands.
  - Section 6.1 mentions Canterbury Regional Council will oversee environmental responsibilities, this is not a function of the compliance team and must sit with a Suitably Qualified and Experienced Person (SQEP) for the consent holder.
  - Section 7.2 - The size of the Sediment Retention Pond (SRP) conflicts with previous sections.
  - No Erosion and Sediment Control Plan (ESCP) included in SMP.
- The cut to fill plans and staging/zone boundaries do not appear to align in a practical sense:
  - Updated plans still show that the first areas proposed to be worked require significant volumes of fill. Clarification is needed to confirm how works are proposed to be managed where the largest volume of cut appears to be in later stages.
- Several delineated wetlands present on site;
  - Wetlands memo shows recommendation of "Any loss of wetland extent should be mitigated by the instatement of new areas of high quality wetland totalling no less than the area loss (i.e., a ratio of at least 1:1)." this does not appear to be taken on in the development plans.
- The proposal includes significant cut planned adjacent to established properties.
- Properties with on-site wastewater systems present, is the plan for these to be removed and remediated?
- There are many bores present on site, are these planned to be decommissioned?
- The groundwater is very shallow so significant dewatering is likely required (less than 1m in places). How is dewatering water planned to be managed? Current Environmental Management Plan (EMP) provided only mentions 1 Sediment Retention Pond (SRP) in stage one with a contributing catchment area of over 10ha. Erosion Sediment Control (ESC) toolbox standard is a max contributing catchment area of 5ha per SRP. Dewatering water is not included in this calculation and cannot be assumed to be directed to an SRP without calculating additional storage capacity requirements
- Multiple waterways planned to be filled on site potentially increasing concentrated flows.

- The limits on exposed area at any one time are not clear and requires more information.
- Will stockpiling be required?
- Where fill is indicated next to established properties, has the flooding risk been assessed?
- Within the Geotechnical assessment:
    - Stormwater inundation isn't assessed and recommends that this is assessed by a specialist consultant but then goes on to assume/expect that with "appropriate stormwater and flood control systems, the risk of inundation will be low."
    - Earthworks section 8.2 does not mention if there are any specific design considerations needed for the filling/removal of wetlands and waterways, only adjacent works or bank stability.

Operational Stormwater:

- Not enough details to comment on anything related to compliance with proposed system. Only have a scheme plan with SMAs to go off, and no proposed sampling protocol etc.
- Hope that if proposed, conditions will align with WDC's global SW consents.

Land Resources – Matthew Riddle

- All of the proposed subdivision is classified as Highly Productive Land (HPL) (LUC 1-3). The soil report from Victor Mthamo suggests the soils on the proposed site are not HPL as defined by the National Policy for Highly Productive Land 2022 (NPS-HPL). This is incorrect and it is in fact HPL.
- The NW part of the property incorporates ~6 ha of a Community Drinking Water Protection Zone (CDWPZ), how will this be protected during site works/excavation?
- Will there be a new reticulated wastewater system built specifically for the subdivision or a connection to the existing Kaiapoi or Rangiora system? If the latter, is there capacity in the system?
- How will the runoff/sediment/phosphorus loss from the construction phase of the subdivision be prevented from entering the several waterbodies present on the site?

Water Quantity – Suzanne Gabites

- The plans available show significant cut/fill to the subdivision area, this will significantly change the way surface water interacts with groundwater (and vice-versa).
- PDP report (July 2025) discusses 1 set of gauging done at several sites in Feb 2025, when flows would have been very low. It is considered that more gauging is required and should be included in conditions. It would be preferred if these are done before a consent is granted to understand the implications of altering the hydrology, and offering other mitigations. The report says that '*The flows gauged and the locations are presented in Figure 10*'. Figure 10 does not exist - so no review of the data is possible at this stage.
- Concern remains about the effect on groundwater contribution to spring-flow to streams, and the impact that will have on existing downstream consent takes and water availability during periods of low flows.
- Also concern remains during rainfall events that the increase to stormwater runoff volume and the lack of impervious ground at the source of these waterways will impact on the ability to drain floodwater without impacting those downstream.
- It is considered that the setbacks are insufficient.

Water Quality & Ecology – Mark Heath (External)

- The 'Aquatic Ecology Report' referred to in the Site Management Plan (SMP) has not been provided. It is considered this document is required for a full assessment of effects. It is considered that the following information would be necessary in the report for a full assessment of effects:
    - A description of ecological values supported by the various waterbodies (this should be supported by field surveys)
    - An assessment of the loss of aquatic habitat and ecological values from changes to each waterbody.
- The maps indicate that several drains – which appear to be highly modified watercourses – as well as wetlands and spring channels will be lost, along with the ecological values they support. Previous evidence on these watercourses suggests that despite being straightened, unvegetated, and highly modified,

these water bodies still provide ecological value and have significant restoration potential.

- The three main watercourses – Ohoka Stream, South Ohoka Tributary, and the Northern Spring channel – are shown with 10 – 20 m riparian setbacks, and notably 30 m setbacks for the springs. However, the maps suggest these streams will be realigned and permanently diverted in some areas, with possible loss of overall stream length. The site management plan states: *"Existing drains will be realigned to suit the proposed development layout, improve the amenity value by naturalisation of formal land drains, and to achieve stormwater and ecological quality objectives"*. The application also refers to these waterbodies as "drains", but it is highly likely at least some of these are natural (albeit modified) streams. Without further detail, it is not possible to assess the impact of these changes on instream habitat, aquatic life, or the net gain or loss of stream length and aquatic habitat.
- Based on the information currently available, the primary concern is the risk of hydrological change affecting the persistence of existing waterbodies and their associated aquatic communities. It is also worth noting that the groundwater scientist has indicated that the development may reduce groundwater inflows to surface water. In streams, this could result in lower baseflows and reduced aquatic habitat, with adverse effects on existing ecological values – including trout spawning (redds), macroinvertebrate and fish communities. In wetland areas, reduced groundwater levels can lead to drying and degrading habitat quality reducing their ability to support biodiversity. The applicant has provided a hydrology report but this is yet to be reviewed by a hydrologist and does not assess stormwater run-off so concerns related to the effects remain.
- The hydrology assessment indicates effects on spring flows will be less than minor. However, downstream impacts from increased stormwater runoff and peak flow changes —particularly effects on instream ecology — have not been assessed.
- The extent of proposed watercourse and wetland removal is significant. At this stage, no assessment has been provided of the ecological values associated with the features to be removed, nor has the effects management hierarchy (avoid, remedy, mitigate, offset, compensate) been addressed. Further clarification is needed on:
    - The ecological values of the streams and wetlands proposed for removal,
    - How any proposed realignments or wetland replacements will achieve no net loss of values,
    - Whether the development complies with relevant NES-F and NPS-FM requirements.

Land Ecology – Jean Jack

- The wetland appears to be all kneed foxtail grassland, so of low value but notably still of some value.
- The key value to protect is connectivity. Any changes to water flows could impact significant wetlands present on Mill Road (*Astelia grandis*).

Groundwater – Ben Wilkins

- There are currently several waterbodies and sources of water on the site (springs, seeps, wetlands, streams, drains). The current proposed design reduces these features into three main water courses that run through the site.
- Increasing the area of impervious surfaces and reducing the area of spring/seep heads (surface interception), wetlands and drains may reduce groundwater flow to the surface within the site after development. This area of Ōhoka is in general an area of groundwater discharge where groundwater comes to the surface as springs.
- However, stormwater infrastructure intercepting groundwater could also increase flows due to shallow groundwater at the site. Until the stormwater design is seen, it is not possible to comment on this issue.
- If groundwater discharge is reduced on the site, it is likely that groundwater will instead form springs further down the catchment, or groundwater levels will be higher further down the catchment (to the east or southeast). There could be an increased flooding risk to downgradient properties from higher groundwater levels or springs. If groundwater discharge is increased from infrastructure interception, then surface water flows may increase downstream.
- The design seems to be less accommodating of waterways and springs/seeps than the previous design.

Contaminated Land – Hannah Mirabueno

Comments on detailed site investigation (DSI) report and corresponding recommendations:

- The contaminated land team have previously commented at the preliminary site investigation (PSI) stage that there was reduction in surface water courses present on the site with time, suggesting possible infilling of these features. The DSI should be amended to include investigation of the infilled features, disturbed

areas, and deeper samples (in suspected landfill) to improve the characterisation of the HAIL sites. It would be good for the DSI to include a plan showing the HAIL sites and the sampling locations. For example, Location Plan 2 shows several structures, and it was difficult to identify which of the buildings are being described in the text. It was also difficult to confirm if the areas of concern were appropriately sampled.

- The DSI report was focussed on the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS), so only human health was considered in the assessment. The previous comments in the PSI i.e. that the regional rule e.g. 5.94A has not been addressed. If this was an RMA application, other LWRP rules pertaining to potentially contaminated or contaminated land would apply and would need to be assessed and addressed. The DSI report should include an assessment of the impact to the environment, not just to human health, particularly if soils would be re-used across the site where there are several streams across the site and the groundwater level is shallow.
- The proposal for the re-use of soil should consider the potential impacts not just to human health but it should also assess the potential effects to the environment. Please provide a methodology for soil re-use that considers both human and environmental health.
- The DSI recommended for a remediation action plan (RAP) to remediate the areas above the NES guideline, however, the applicant has not provided one. The DSI has not delineated the areas that require remediation. Instead, it identified "initial areas zoned for remediation" which are the identified HAIL sites. There is also a proposal to re-use soil on site. For these reasons and for better planning strategy, RAP should be provided upfront. The RAP should have clear target goals e.g. areas where soil removal would be undertaken, soil re-use methodology and soil contamination concentrations, validation objectives, discovery protocols, reporting etc.
- Asbestos in soil was detected at levels exceeding human health, but no visible asbestos (ACM) was found. It is not confirmed how the soil was contaminated by asbestos. Due to the age of the buildings, it is likely that asbestos was used to construct them. It is recommended that these buildings are surveyed prior to demolition. An asbestos removalist may be required to ensure proper removal of ACM. It is recommended that soils around these buildings are tested for asbestos after demolition is completed. Can the submission of additional investigation prior to any earthworks be a condition of consent?

- Prior to further earthworks, all contaminated areas should be remediated, and a site validation report (SVR) be completed. If this was an RMA consent, certification/approval is typically required by the consenting councils. Can the submission and approval/certification of a SVR be a consent condition?

Additional Comments

- Given the site's condition's e.g. shallow groundwater level and streams traversing the site, if subdivision would proceed, there is concern that the application site would be subjected to potential leaching of heavy metals, particularly arsenic from (chromated copper arsenate) CCA -treated wood that will be used as posts and boundary fences. The applicant should provide an assessment how the potential adverse effects would be mitigated.
- The Site Management Plan (SMP) envisaged resource consenting requirements around dewatering, earthworks, and stormwater discharge. For dewatering, it is proposed to test the groundwater quality sampling to be carried out prior to the works commencing to ensure that discharges to surface water will meet the receiving water criteria. It is highly likely that groundwater testing of the extracted water will be the more ideal way to confirm the suitability prior to discharge.
- If importation of fill material will be undertaken, please provide details of the type and levels of contamination of material that will be imported to the site.
- As there are HAIL sites within the application site, the Waimakariri District Council would be assessing the application under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011.

<u>Natural Hazards – Callum Margetts</u>

- The technical expert considers that the following assessments should be provided as part of the application:
    - Offsite flood effects
    - Onsite flood mitigation
    - Pre- and post-development flood modelling

<u>Consents – Joanne Mitten & Sam Prystupa</u>

- The consents team will provide comments once a rule assessment is received.

Please note once Canterbury Regional Council receives the draft application we can amend our comments accordingly.

1 May 2026

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

Kia Ora Meg,

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

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

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

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

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

Ngā mihi

Team Leader – Significant Consents

Meg Davidson

From: Joanne Mitten [redacted]
Sent: Friday, 8 May 2026 3:55 PM
To: [redacted]
Cc: Tallulah Parker; External - Bruce Van Duyn; External - Tim Carter; External - Tim Walsh; Meg Davidson; Sam Prystupa
Subject: CRC feedback on draft technical reports and s30 position
Attachments: RMA252504 - Ōhoka Residential Subdivision - Carter Group Limited - CRC Draft Application Feedback.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Kia ora Jono,

Thanks for your patience while we collated feedback from our technical experts on the draft technical reports that have been provided.

Please find attached a feedback document prepared based on advice from CRC's technical experts. Please note that further feedback relating to Stormwater and Natural Hazards will be provided on Monday.

We also considered it prudent to clarify CRC's position regarding section 30 of the FTAA. CRC's position is that the letter dated 13 April 2026 (corrected on 14 April 2026) is the response provided for the purposes of section 30(3) of the FTAA. The response dated 1 May 2026, along with any future responses relating to matters under section 30 of the FTAA (including the attached document and this email), are additional feedback provided following receipt of further information from Carter Group and are not responses from CRC for the purposes of section 30(3) of the FTAA. Accordingly, CRC does not consider there is any need, or mechanism, to reissue or retract the letter dated 1 May 2026.

CRC also notes that it will have the opportunity to review the substantive application, including any further modelling relating to water takes, under section 47(1)(b) of the FTAA in relation to whether there are any existing resource consents of the kind referred to in section 30(3)(a) of the FTAA that are not identified in the substantive application. CRC will respond accordingly at that stage based on the information provided with the application.

CRC is happy to discuss any of the feedback provided, or any other matters raised in this email, further.

Ngā mihi,
Jo

Joanne Mitten
Principal Consents Planner
Environment Canterbury
Tuam Street

Environment Canterbury Regional Council
Kaunihera Taiao ki Waitaha

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IN-CONFIDENCE

Pre-Application Advice for Ōhoka Residential Subdivision, Applicant – RMA252504

Disclaimer: *This feedback provides preliminary technical council guidance on potential matters that may affect applications under the Fast-track Approvals Act 2024. It does not constitute legal advice and should not be relied upon as such. The advice reflects an initial review of material within limited timeframes and is not a full or definitive assessment.*

Project Summary

The Ōhoka Residential Subdivision is a proposal to subdivide land and develop approximately 850 residential dwellings, a commercial or mixed-use centre, and a polo field, and enable the potential development of a school or retirement village (or both).

Consent Requirements

The Applicant has provided an assessment of consent requirements under the Canterbury Land and Water Regional Plan (LWRP) and the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F). Based on that assessment, the Applicant seeks consent for the following activities.

a. Discharge consent(s) under section 15 of the Resource Management Act 1991 (RMA) to provide for the discharge of construction-phase stormwater, dewatering water, sediment and minor contaminants associated with earthworks, works in waterways and vegetation clearance, and operational stormwater.
b. Water permit(s) under section 14 of the RMA to provide for the take and use of water associated with construction activities, construction dewatering, works in waterways, groundwater interception, waterway diversion, wetland drainage, and the establishment and operation of a community drinking water supply.
c. Land use consent(s) under section 13 of the RMA to provide for vegetation clearance within river and riparian margins, activities within the beds of rivers including culvert removal and installation, river reclamation works, and river realignment.
d. L and use consent(s) under section 9 of the RMA to provide for earthworks associated with subdivision and infrastructure construction, and the construction, enhancement, maintenance, and removal of wetlands.

Assessment of Effects

Canterbury Regional Council (CRC) expects that the substantive application will include a comprehensive assessment of effects across relevant consenting matters, supported by the technical reports.

Policy Framework

CRC expect that the substantive application will include assessments against the relevant policies from national direction, as well as the Canterbury Regional Policy Statement (CRPS) and LWRP.

Conditions

CRC expects that the substantive application will include a suite of draft conditions to address effects associated with the matters for which consent is sought.

Other Matters

CRC notes based on the ecological information at the site wildlife approval is likely to be sought under the Wildlife Act 1953 and that this is a matter for the Applicant to work through with the Department of conservation (DOC). Similarly, we anticipate that the applicant will also seek the relevant consents, as applicable under the relevant district plan, in this case the Waimakariri District Plan (WDP).

CRC staff have raised the following comments regarding this proposal:

Surface Water Resources –

- CRC requests an assessment of current land surface recharge across the site, the expected reduction with development, and the net cumulative effects on spring and stream flows, including consideration of the seasonal mismatch between winter–spring recharge and summer irrigation abstraction.
- CRC requests further information and quantitative assessment to support the conclusion that reduced land surface recharge will not significantly affect groundwater levels or wetland hydrology, including the relative contribution of local versus regional recharge within the spring catchment.
- CRC considers an assessment of the potential effects of the proposed realignment of the Northern Spring Channel on the Southern Spring Pond and spring M35/7487 is required.
- CRC considers that potential downstream effects are uncertain in the absence of modelling or monitoring and is open to discussing modelling or monitoring-based trigger levels as part of consent conditions.

- CRC requests an assessment of the potential effects on downstream users arising from changes in the timing of stream depletion resulting from the shift in abstraction from the shallow water table to deeper aquifers.
- CRC requests an assessment of effects on surface watercourses resulting from groundwater interception via subsoil drains.
- CRC requests further information on the proportion of dewatering water proposed to be discharged to land, and the proposed management of effects associated with any resulting loss of flow.

Water Ecology and Quality –

- CRC requests an assessment of changes in peak flows resulting from the increase in impervious surfaces, including potential effects on aquatic ecology.
- CRC notes that specific stormwater discharge locations have not been identified and requests that all discharge points be clearly shown. CRC also requests an assessment of water quality effects at each discharge location, rather than solely a cumulative site-wide assessment.
- CRC acknowledges the Applicant's assessment of total suspended solids (TSS); however, further assessment of effects on the receiving environment in relation to water clarity, colour, and sediment deposition is also required. This assessment should include potential effects on water temperature, suspended and deposited sediment, and consequential effects on aquatic life.
- CRC requests clarification on the classification of the six drains, specifically whether the Applicant considers them to be modified natural watercourses or artificial watercourses.
- CRC requests further clarification regarding the proposed mitigation measures and application of the effects management hierarchy, including clear identification of the measures proposed to avoid, minimise, remedy, mitigate, offset, or compensate for effects on the waterways identified in the report.
- CRC requests clarification on the quantification of the proposed offset in relation to the scale of residual adverse effects resulting from the proposal.

Land Ecology –

- CRC considers further information is required on potential changes in downstream flows to wetlands, including an assessment of the resulting effects on those wetlands.

Land Resources Science –

- CRC requests clarification on the discharge location for overflow from the sediment removal pond (SRP).

Groundwater Resources –

- CRC requests metering data for irrigation consents CRC991022 and CRC991827 to better understand the existing environment.
- CRC requests further information on groundwater levels, including piezometer data from June 2025 (or justification if unavailable), and consideration of nearby monitoring wells M35/0596, M35/0312, and M35/0596.
- CRC requests an assessment of current land surface recharge across the site, the expected reduction with development, and the net cumulative effects on spring and stream flows, including consideration of the seasonal mismatch between winter–spring recharge and summer irrigation abstraction.
- CRC requests identification of sensitive areas where groundwater flow paths may be affected by excavation trenches and other earthworks.
- CRC requests further information and quantitative assessment to support the conclusion that reduced land surface recharge will not significantly affect groundwater levels or wetland hydrology, including the relative contribution of local versus regional recharge within the spring catchment.
- CRC considers that potential downstream effects are uncertain in the absence of modelling or monitoring and is open to discussing modelling or monitoring-based trigger levels as part of consent conditions.
- CRC notes that well interference effects will need to be reassessed following well construction and testing.
- CRC requests an assessment of effects on surface watercourses resulting from groundwater interception via subsoil drains.
- CRC requests further characterisation of groundwater chemistry and nutrients, as current data is limited to a single shallow well sample.
- CRC notes uncertainty in predicted drawdown effects on neighbouring bores due to estimated parameters and requests further information on how drawdown will be managed during water takes.

Contaminated Land –

- CRC requests that the staging of earthworks, including remedial works associated with farm dumps/pits, be clearly identified. This should include preparation of a Remedial Action Plan (RAP) for approval prior to the

commencement of earthworks, and provision of a Site Validation Report (SVR) upon completion of remedial works.

- CRC requests clarification on whether the potentially infilled waterways identified on the site will be subject to further investigation during the construction phase.
- CRC requests further clarification on whether the ANZG GV High thresholds have been assessed as low risk for the construction phase only, or whether this assessment also applies to the operational phase.
- CRC requests that a methodology for soil reuse, removal, disposal, and importation be provided.

CRC further notes that consideration of the initial feedback provided on 8 August 2025 still applies.

CRC looks forward to continuing to engage with the Applicant.

Nga mihi nui

Jo Mitten
Principal Planner
8 May 2026