



FTAA-2605-1235: Application received for referral of the project under the Fast-track Approvals Act 2024 – Stage 2 decisions

Project Name: John Paterson Estates

Date submitted	27 August 2026	Tracking	26-BRF-02377
Security level	In-Confidence	Priority	Urgent

To	Action sought	Response by
Hon Chris Bishop Minister for Infrastructure	Decisions on recommendations	3 September 2026

Actions for Minister's Office staff	Return the signed briefing to: <i>FTAreferrals@mfe.govt.nz</i> Send email to Ministers to invite written comments
Number of appendices: 6	Appendices: 1. Statutory framework for making decisions 2. Application documents for John Paterson Estates 3. Stage 1 Briefing Note and decisions 4. Section 18 Report on Treaty settlements and other obligations 5. Comments received from invited parties 6. Draft Notice of Decisions

Ministry contacts

Name	Position	Telephone	1 st contact
Oliver Sangster	Principal Author		
Stephanie Frame	Manager	s 9(2)(a)	✓
Ilana Miller	General Manager	s 9(2)(a)	



Project location

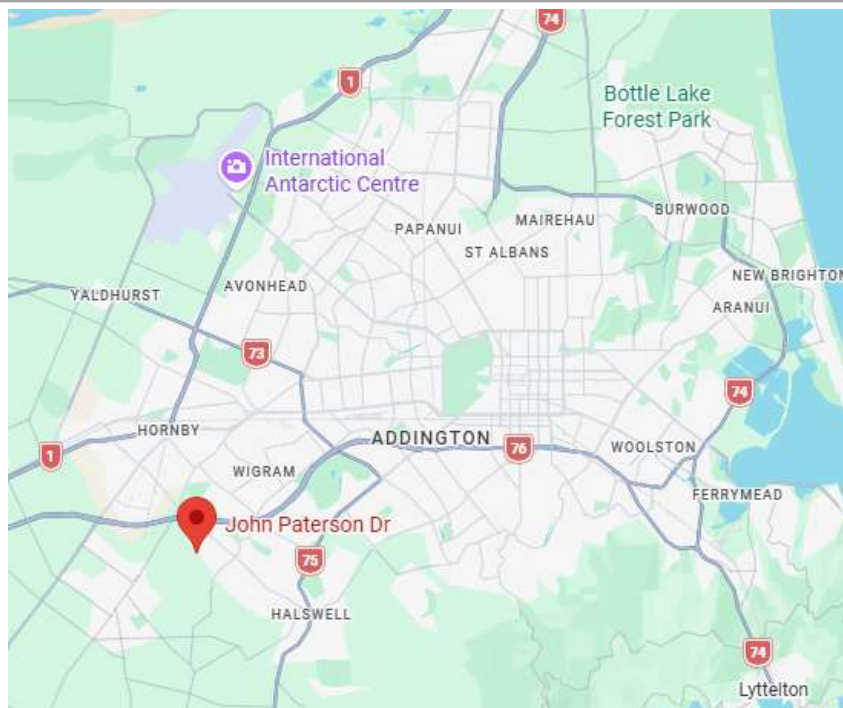


Figure 1 General location of the project in Christchurch (red marker)



Figure 2: Project site (yellow) in relation to Christchurch Southern Motorway and surrounds



Key messages

1. This briefing seeks your decisions under section 21 of the Fast-track Approvals Act 2024 (the Act) on the application from John Paterson Estates Limited (the applicant) to refer the John Paterson Estates (the project) to the fast-track approvals process.
2. A copy of the application is in Appendix 2. This is the second briefing on this application. The first (Stage 1) briefing (26-BRF-01521) with your initial decisions annotated is in Appendix 3.
3. The project involves the subdivision of approximately 38 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.
4. Key components of the project include:
 - a. the subdivision of land into approximately 510 residential lots
 - b. an enhanced riparian margin adjacent to Knights Stream
 - c. an integrated street and reserve network incorporating stormwater management
 - d. associated public and/or developer-led infrastructure.
5. The project will require the proposed approvals:
 - a. resource consent under the Resource Management Act 1991 (RMA)
 - b. archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014
 - c. Wildlife Act authority under the Wildlife Act 1953
 - d. approval under the Freshwater Fisheries Regulations 1983 for the construction of a dam or culvert in Knights Stream.
6. We recommend you **accept** the referral application as the project meets the criteria set out in section 22 and does not appear to involve an ineligible activity.
7. We seek your decisions on this recommendation and on the proposed directions to the applicant and notification of your decisions.

Assessment against statutory framework

8. The statutory framework for your decision-making is set out in Appendix 1. You must apply this framework when you are deciding whether to accept or decline the referral application and when deciding on any further requirements or directions associated with referral of the project.
9. Before accepting the project, you must consider the application (in Appendix 2), the section 18 Treaty settlements report (in Appendix 4), any comments from invited parties (in Appendix 5), and any document that requires your consideration under section 16 and comply with any procedural requirements under section 16. Following that, you may accept the application if you are satisfied that it meets the criteria in section 22 of the Act and if there are no reasons meaning you must decline the application. We provide our advice on these matters below.



Section 18 Treaty settlements and other obligations report

10. We identified Te Rūnanga o Ngāi Tahu, Te Ngāi Tūāhuriri Rūnanga, Te Taumutu Rūnanga, Whitiara Centre Limited, and Mahaanui Kurataiao Limited as the relevant Māori groups under section 18(2) of the Act.
11. The relevant Treaty settlement is the Ngāi Tahu Claims Settlement Act 1998. In its acknowledgements and apology to Ngāi Tahu, the Crown recognised its failures to fulfil its Treaty obligations and commits to a new age of co-operation with Ngāi Tahu. The Crown also recognised Ngāi Tahu as holding rangatiratanga and mana within the takiwā of Ngāi Tahu Whānui.
12. While other redress provided through the Ngāi Tahu settlement provides important context for this application – such as that relating to Te Waihora/Lake Ellesmere, taonga species, and the conservation protocol – we have not identified any other principles and provisions of the settlement which are directly relevant. We note that the project area is within an area subject to regulations made under Part 9 of the Fisheries Act 1996, which established the customary food gathering area/rohe moana of Te Taumutu Rūnanga.
13. You received comments on the application from Whitiara Centre Limited and Mahaanui Kurataiao Limited (on behalf of Te Ngāi Tūāhuriri Rūnanga and Te Taumutu Rūnanga, respectively). Both groups noted that the project area is within the culturally significant catchment of Te Waihora, and the importance of ensuring that the proposed activities do not contribute to further degradation of the catchment. Whitiara Centre Limited and Mahaanui Kurataiao Limited each made a number of recommendations, including in relation to works in streams, stormwater discharges, monitoring water quality, planting indigenous species, management of contaminated soil, erosion and sediment control, and the need to observe minimum riparian setbacks.
14. More broadly, Whitiara Centre Limited expressed concern at whether the cumulative impacts of a number of residential subdivisions in this area are being adequately considered.
15. We do not consider there are any matters raised in this report which make it more appropriate for the proposed approvals to be authorised under another Act or Acts.

Section 16 Effects of Treaty settlements and other obligations on decision-making

16. There are no relevant documents or procedural requirements for you to consider under section 16 of the Act.

Written comments received

17. Written comments were received from the relevant local authorities, administering agencies, two Māori consultation groups, Ministers, and New Zealand Transport Agency Waka Kotahi (NZTA).
18. The key points of relevance to your decisions are summarised in Table A. Themes include:
 - a. **Out-of-sequence/infrastructure constraints:** Christchurch City Council (CCC) was opposed to the project as out of sequence, noted constraints with the existing wastewater and drinking water supply (which has capacity to service existing planned growth), and considered its economic benefits were likely overstated given the absence of consideration in the referral application. CCC provided other technical comments, including the need to manage stormwater to align with CCC's existing 'global consent' from Canterbury Regional Council.



- b. **Transport impacts:** NZTA and CCC noted potential impacts on the surrounding transport network, including Christchurch Southern Motorway/State Highway 76 (which NZTA holds a designation for) and key intersections in the vicinity of the site. NZTA recommended the applicant be required to prepare an Integrated Transport Assessment, prepared in consultation with NZTA.
 - c. **Highly productive land:** CRC and CCC noted the site's highly productive land, suggested that the site could be used for alternative uses. We note the applicant assessed the project as likely having non-complying activity status under the Christchurch District Plan as it involves subdivision creating lots less than 4 hectares in the rural zone.
 - d. **Other technical aspects:** A range of other potential impacts were raised, including stormwater management, wildlife, and setback distance from Knights Stream. We note the applicant assessed the project as likely having non-complying activity status under the Canterbury Land and Water Plan due to stormwater discharge. These are matters which could be addressed by the applicant through a substantive application and an expert panel in its decision-making.
19. The Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development supported referral.

Reasons to decline

20. The statutory framework in Appendix 1 sets out the situations where you must decline the application for referral under section 21(3). We do not consider you must decline this application.
21. You may also decline the application for any other reason under section 21(4). The Act gives some guidance on matters you could consider when deciding whether to decline an application, discussed in Table A. We do not consider the application should be declined in respect of any of those matters.

Reasons to accept

22. The statutory framework in Appendix 1 sets out the reasons you can accept a project for referral.
23. Our assessment of these matters is summarised in Table A. We consider the project meets the requirements of section 22, as:
- a. it is an infrastructure or development project because it is a residential subdivision and development, including relevant onsite infrastructure for that development
 - b. it would have significant regional or national benefits because it:
 - i. would increase housing supply (approximately 510 additional houses)
 - ii. would have significant economic benefits at a regional level associated with planning, infrastructure provision and residential construction during its construction phase only, as demonstrated by the applicant's economics assessment, being an estimated:
 - 1. 1,330 FTE years of employment
 - 2. \$114 million in wages
 - 3. \$191 million GDP
 - c. referring the project:



- i. would facilitate it to be processed in a more timely and cost-effective way than under normal processes, as it has non-complying activity status under the Christchurch District Plan and would otherwise likely require a plan change, and the Fast-track process would allow multiple approvals to be obtained through the single approvals process
- ii. is unlikely to materially affect the efficient operation of the fast-track approvals process, as it is a residential development in the vicinity of a wider growth area on Christchurch's urban rural fringe, similar to other types of developments that have proceeded through the Fast-track process.

Other matters

24. We have identified issues further to the matters identified above and our analysis of these is in Table A.
25. The project exists on highly productive land, but is adjacent to an existing area of residential development (Haswell) and State Highway 76. The applicant has put forward a case for development of this particular area including consideration of provisions of the National Policy Statement for Highly Productive Land (NPS-HPL). We do not consider this is a barrier to referral of this application, and that the specifics of the project in relation to the NPS-HPL and other planning provisions (such as the National Policy Statement for Urban Development) would be well traversed through an expert panel process.
26. We agree that, given the site's proximity and connection with the Christchurch Southern Motorway, there are likely to be traffic impacts affecting the State Highway that an expert panel would need to consider through a substantive application. For this reason, we consider that requiring an integrated transport assessment as additional information for a substantive application, and requiring comments be invited from NZTA, is justified in this instance.
27. DOC considered it would be beneficial for the applicant to engage further with DOC on application needs prior to lodging a substantive application. While we agree it would be in the applicant's interests to engage upfront as much as possible including with administering agencies (e.g. to reduce risk of a substantive application having information missing when lodged), further pre-lodgement engagement is not a mandatory element of the Fast-track process and we do not consider there to be any special circumstances in this application that would warrant making this a condition of referral. The applicant can do so at its discretion.

Conclusions

28. We consider the project meets the section 22 criteria and you could accept the referral application under section 21 of the Act and refer the project to the fast-track approvals process with the specifications outlined below.
29. We consider that if you decide to refer the project, you should specify under section 27 of the Act the following requirements that should apply to the project:
 - a. An infrastructure capacity assessment, considering the downstream network and Christchurch Wastewater Treatment Plan capacity to service this development (relative to existing urban growth that has been planned for through the District Plan)



- b. Description of any offsite infrastructure upgrades required to service the project, including water, wastewater (network and treatment plant), and roading, including how this will be funded, and any alignment with existing CCC's maintenance, renewal, and upgrade programmes
 - c. Stormwater assessment that considers full flood attenuation and any impact on Christchurch City Council's global consent requirements for flood compliance
 - d. An Integrated Transport Assessment, including consideration of impacts on existing key intersections throughout Halswell and State Highway 76 / Christchurch Southern Motorway
 - e. An expert panel must invite comment from NZTA on any substantive application for this project.
30. We consider the above restrictions are required to provide an expert panel with adequate information to consider the project (and appropriate conditions) in respect of the project's impacts on:
- a. existing servicing infrastructure, including growth demands
 - b. stormwater, with appropriate regard to CCC's existing 'global consent' from CRC relating to flooding
 - c. traffic and transport, on in relation to key existing intersections and State Highway 76 (Christchurch Southern Motorway).
31. Based on the information in the referral application, an expert panel may be required to invite comment from NZTA, as a requiring authority with a designation on part of the site (section 53(2)(I)). However, it is possible that the project detail could be refined ahead of a substantive application, to the extent that existing section 53(2) criteria might not include NZTA. Given the project's likely effects in relation to the State Highway, we recommend you specify NZTA under section 27 to ensure it is invited to comment on any substantive application.
32. We have not identified any reason to set a deadline to lodge a substantive application under section 27(3)(b)(i), so suggest the default 2-year deadline applies under section 28(3)(d)(ii).

Next steps

33. The Secretary for the Environment (the Secretary) must give notice of your decisions on the referral application, and the reasons for them, to the applicant(s) and anyone invited to comment under section 17 and publish the notice on the Fast-track website.
34. If you decide to refer the project, the Secretary must also give notice of your decision to:
- a. the panel convener
 - b. any additional iwi authorities or Treaty settlement entities that you consider have an interest in the matter other than those invited to comment under section 17
 - c. the Environmental Protection Authority (EPA)
 - d. the relevant administering agencies
35. You must also provide all of the information you received that relates to this application to the EPA and the panel convener, including:
- a. the referral application



- b. any comments received under section 17
- c. the report obtained under section 18
- d. if a report was obtained under section 19, that report.

36. We will undertake this action on your behalf.

37. We have attached a notice of decisions letter to the applicant(s) based on our recommendations (refer Appendix 6) and we will provide it to all relevant parties. We will provide you with an amended letter if required.

38. Our recommendations for your decisions follow.

Recommendations

39. We recommend that you:

- a. **Note** section 21(3) of the Fast-track Approvals Act 2024 (the Act) requires you to decline the referral application from John Paterson Estates Limited (the applicant) if you are satisfied that the project involves an ineligible activity, or you consider that you do not have adequate information to inform the decision under this section or if you are not satisfied that the John Paterson Estates project (the project) meets the referral criteria in section 22 of the Act.

Noted

- b. **Agree** that before deciding on the application for project referral under section 21(1) of the Act you have considered:

- i. the application in Appendix 2
- ii. the report obtained under section 18 in Appendix 4
- iii. any comments sought under sections 17 and 20 and provided within the required timeframe in Appendix 5.

Yes / No

- c. **Agree** you are satisfied the project will meet the referral criteria in section 22 of the Act as:

- i. it is a development project that would have significant regional or national benefits because it
 - 1. would increase housing supply (approximately 510 additional houses)
 - 2. would have significant economic benefits at a regional level associated with planning, infrastructure provision and residential construction, as demonstrated by the applicant's economics assessment, being an estimated:
 - (a) 1,330 FTE years of employment
 - (b) \$114 million in wages
 - (c) \$191 million GDP impact
- ii. referring the project
 - 1. would facilitate it, including by enabling it to be processed in a more timely and cost-effective way than under normal processes on the basis of its non-complying activity



status under the Christchurch District Plan meaning it would likely need to pursue a private plan change under normal processes, and that multiple approvals can be obtained under the single approvals process (22(1)(b)(i))

2. is unlikely to materially affect the efficient operation of the fast-track approvals process, being a residential development in the vicinity of a wider growth area on Christchurch's urban rural fringe (22(1)(b)(ii)).

Yes / No

- d. **Agree** to accept the referral application under section 21(1) and refer the whole project to the fast-track approvals process under section 26(2).

Yes / No

- e. **Agree** to specify John Paterson Estates Limited as the person who is authorised to lodge a substantive application for the project

Yes / No

- f. **Agree** to specify under section 27(3)(b) of the Act:

- i. the following information that the applicant must submit with the substantive application:

1. an infrastructure capacity assessment, considering the downstream network and Christchurch Wastewater Treatment Plan capacity to service this development (relative to existing urban growth that has been planned for through the District Plan)
2. description of any offsite infrastructure upgrades required to service the project, including water, wastewater (network and treatment plant), and roading, including how this will be funded, and any alignment with existing CCC's maintenance, renewal, and upgrade programmes
3. an Integrated Transport Assessment, including consideration of impacts on existing key intersections throughout Halswell and State Highway 76 / Christchurch Southern Motorway
4. a stormwater assessment that considers full flood attenuation and any impact on Christchurch City Council's global consent for flood compliance

- ii. the following person or group from whom a panel must invite comments from in addition to those specified in section 53:

1. the Chief Executive of New Zealand Transport Agency Waka Kotahi

Yes / No

- g. **Agree** that the Secretary for the Environment will provide your notice of decisions to:

- i. Anyone invited to comment on the application including local authorities and relevant Māori groups



- ii. the panel convener
- iii. The Environmental Protection Authority (EPA)
- iv. The following relevant administering agencies:
 - 1. Department of Conservation
 - 2. Heritage New Zealand Pouhere Taonga

Yes / No

- h. **Approve** the draft notice of decisions letter to the applicant(s) (attached in Appendix 6).

Yes / No

- i. **Note** that should you decide to accept the referral application, our recommendations for appropriate directions to the applicant (relating to information to be supplied with the substantive application) are included in Table A.

Signatures

Stephanie Frame
Manager – Fast-track Operations

Hon Chris Bishop
Minister for Infrastructure

Date:

Table A: Stage 2 analysis

Recommendation	Accept the referral application and refer the project to the fast-track approvals process		
Project details	Project Name	Applicant	Project Location
	John Paterson Estates	John Paterson Estates Limited	37.7 hectares at John Paterson Drive, Halswell, Christchurch. The site is located across nine lots and Record of Titles 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).
Project description	Subdivision and establishment of 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: - subdivision of approximately 38 hectares of Rural Urban Fringe zoned land into approximately 510 residential lots - an enhanced riparian margin adjacent to Knights Stream - an integrated street and reserve network incorporating stormwater management - associated public and/or developer-led infrastructure. The project will require the proposed approvals: - resource consent under the Resource Management Act 1991. - archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 - Wildlife Act authority under the Wildlife Act 1953. - approval under the Freshwater Fisheries Regulations 1983.		
Minister invites comments / requests information	Comments from invited parties Local authorities <i>Christchurch City Council (CCC)</i> - Commented on the referral application itself, with pre-lodgment comments to the applicant attached. Key issues include: - As an out-of-sequence development, CCC does not support the project due to current infrastructure capacity constraints, and available funding for additional required capacity (significant concerns about project feasibility). Planned growth already anticipated by the district plan is modelled to fully utilise available wastewater capacity over time. New water supply connection is likely to require upgrades to existing water mains ahead of their planned renewal timeframe – which has implications for capacity and future planning of wider supply network. Surrounding transport network has capacity constraints including at key intersections, and comprehensive traffic effects assessment is needed. Overall benefits may be overstated, given cost of providing infrastructure capacity has not been adequately assessed, including “costs which would fall on CCC ratepayers”. - Considers project inconsistent with Christchurch Spatial Plan, Canterbury Regional Policy Statement, and Christchurch District Plan (CDP), and not needed to address any housing shortfall due to existing capacity provided through CDP Plan Change 14. - Considers insufficient information to demonstrate consistency with National Policy Statement – Highly Productive Land. - Details of stormwater, urban design, geotechnical, earthworks, contamination and noise (including reverse sensitivity regarding the adjacent state highway) issues, that could be addressed in detail at any substantive application stage. - Identified no competing applications, and noted section 30(3)(a) consents are not relevant to CCC (as those relate to regional consents). - Suggested requiring following information with a substantive application, if referred: - An infrastructure capacity assessment, considering the downstream network capacity, including the Christchurch Wastewater Treatment Plant, and the capacity required to facilitate the urban growth that has been planned for through the District Plan - Upgrades required to facilitate the project, including water, wastewater network, wastewater treatment plant and roading, including how this will be funded, and alignment with CCC’s maintenance, renewal, and upgrade programmes (to ensure efficient infrastructure provision that avoids re-work). - An economic assessment that considers net benefits, considering infrastructure costs and transfer effects, and quantifies net benefits in regional terms. - If not referred, the project would likely need a private plan change. Considers Fast-track may not be the most cost-effective way to proceed, due to infrastructure constraints and potential funding implications, compared to a strategic plan change approach. No competing applications or ineligible activities identified. - Attached wider policy advice on Fast-track referrals from the City Planning Unit, not specific to this project, which concluded: - there continues to be strong market demand for stand-alone housing across Greater Christchurch, but currently limited capacity to support additional greenfield development in the remaining Christchurch rural areas. CCC 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 improving market competitiveness, given the significant current infrastructure capacity constraints. CCC's position is 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. CCC considers that work should be timed to inform development of the Regional Spatial Plan, as most appropriate process to identify future long term growth areas.

Canterbury Regional Council (CRC)

- Based on the information available, considers it unlikely that the project would have significant adverse environmental effects.
- Overall, appears broadly consistent with the Canterbury Regional Policy Statement (CRPS), subject to adverse effects being appropriately avoided, remedied, or mitigated/controlled.
- Notes stormwater would be discharged under CCC's global consent and that wastewater from the proposed subdivision would be connected to reticulated Council infrastructure. Anticipate that 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 Canterbury Land and Water Regional Plan. Unclear whether the applicant has obtained approval from CCC to discharge stormwater into Knights Stream under the existing CCC global stormwater consent.
- CRC has not peer reviewed the applicant's economic assessment and does not question it.
- CRC feedback provides some discussion of potential alternative primary production land uses (arable/pastoral), and that this may be supported by efficient irrigation to minimise water use, in light of the site's highly productive soil (32 ha of class 1, and 5 ha of class 2).
- A detailed site investigation is needed in light of potential contaminated soil/activities onsite from the hazardous activities and industries list. Flood hazard is expected to be low once stormwater and earthworks design has been completed. Further information is needed regarding the anticipated inflow and outflow concentrations of key stormwater contaminants.
- CRC is not aware of the activity involving any ineligible activities, mandatory reasons to decline referral, or reason why the matters would be more appropriate to deal with under another Act. No competing applications identified, or existing resource consents where RMA sections 124C(1)(C) or 165ZI are relevant. No compliance history identified.

Ministers

The Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

- Supported the application progressing and encouraged the applicant and 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 section 18 report.

The Minister of Culture and Heritage

Responded with no comment.

Māori Groups

Mahaanui Kurataiao Ltd

- Te Taumutu Rūnanga are so far neutral to this application
- Included a number of recommendations for consideration "to moderate effects of the activity on mana whenua values", and "to align this proposal more closely with the provisions in the Mahaanui [Iwi Management Plan]", including in relation to soil contamination, native plantings/maintenance, stormwater management, archaeological finds (accidental discovery protocol), earthworks, site surveying for indigenous flora/fauna, and referred to the *Ngai Tahu Subdivision and Development Guidelines*.
- Recommended a 10 metre setback from waterways, "it seems that the minimum setback distance proposed by the applicant is 6 metres".

Whitiara Centre Limited

- The project is within the catchment of Te Waihora (Lake Ellesmere) - every effort should be made to ensure that the urban use of this land does not adversely and cumulatively contribute to further degradation of the lake, including earthworks management, stormwater and providing for taonga species (freshwater fish), springs and mahinga kai. The proposed reserve adjoining Knights Stream is supported, as is planting with necessary maintenance. Connection to reticulated water supply and wastewater is supported. Concerned about potential release of copper and zinc from roofs – seeks clarification from applicant that this will not be used.
- On behalf of Ngāi Tūāhuriri, Whitiara raises 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.
- Considers the applicant has provided information to demonstrate that the project will be undertaken in accordance with best practice, and expects these matters to be enforced through consent conditions, and seeks further information on water quality monitoring conditions (and who would be responsive for adaptive management over time if monitoring identifies issues).
- Considers further information is required on how the development will be supported by essential services, such as schooling, healthcare facilities, and public transport.

Administering agencies

Department of Conservation (DOC)

- Considers there is adequate information for a referral decision.
- Considers project not inconsistent with the Conservation General Policy Statement 2005, and Canterbury (Waitaha) Conservation Management Strategy 2016, subject to considerations below.
- Considers further investigation should be undertaken regarding bat habitat (with management controls possibly necessary), and further detail about scope of works for the Complex Freshwater Fisheries Approval. Assessments should be undertaken to confirm lizard presence, mitigation and relocation needs. Once more detailed information is available, it would be possible to apply appropriate conditions for the project to not have significant adverse environmental effects.

	- No reasons identified why the project should not be referred, no inconsistency with Treaty settlements or other obligations identified, no reason why the wildlife or freshwater fisheries should be dealt with under another Act, no compliance issues or competing applications identified. No additional matters identified that the Minister should take into account under section 22 criteria - DOC considers it would be highly beneficial for the applicant to engage further with DOC prior to making a substantive application. <i>Heritage New Zealand Pouhere Taonga (HNZPT)</i> - HNZPT noted its pre-lodgment recommendation that the applicant engage a suitably qualified archaeologist to assess the project on, but that the applicant has not provided an archaeological assessment at this stage. HNZPT notes the applicant has stated they have engaged an archaeologist, and that any resulting assessment will form part of the substantive application. - HNZPT notes the project area is of significance to Ngāi Tahu hāpori, and notes relevant Ngāi Tahu entities are being consulted with, and no cultural impact assessment has been provided with this application. - In order to mitigate the adverse effects on archaeological values, a suite of conditions will be required, which has been discussed with the applicant. HNZPT anticipates further engagement with the applicant to ensure all relevant documentation is provided with a substantive application. Any other persons or groups <i>NZ Transport Agency Waka Kotahi (NZTA)</i> - Considers an integrated transport assessment (ITA) “must be prepared in consultation with NZTA to ensure the assessment addresses potential concerns”. NZTA stated “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”. - Notes the application indicates approximately 7,000 m² of the application site is within the NZTA CSM2/SH76 designation, but the application does not provide detail about how works within the designation, or adjacent to it but affecting the designation area (e.g. stormwater runoff), will be authorised and managed, and considers approval from NZTA under section 176 of the RMA will be needed for this. - Noted noise and reverse sensitivity effects from the motorway in respect of the residential development would need consideration as part of a substantive application. - NZTA does not have any concerns with this application being referred into the fast-track approvals process and would welcome the opportunity to provide comments to the applicant as they prepare a substantive application and comment on an application if referred.
The Minister must decline an application if the Minister is satisfied that the project involves an ineligible activity [section 21(3)(b)]	We consider you can be satisfied that the project does not involve an ineligible activity because it: – would not occur on identified Māori land, Māori customary land or a Māori reservation, as confirmed by the relevant records of title – would not occur in a customary marine title area or protected customary rights area, because it is not in the coastal marine area (CMA) – is not an aquaculture activity or activity that is incompatible with aquaculture activities that would occur in an aquaculture settlement area and for which the applicant is not authorised to apply for a coastal permit because it is not in the CMA – would not require an access arrangement which cannot be granted under the Crown Minerals Act (including s61(1A)) because it is private land – would not be prevented by section 165J, M, Q, ZC or ZDB of the RMA, because it is not in the CMA – would not occur on Schedule 4 land – would not occur on a national reserve – would not occur on a reserve held under the Reserves Act 1977 that is managed by or vested in someone other than the Crown or a local authority and that person has not consented in writing as confirmed by the record of title – is not a prohibited activity or decommissioning activity under the EEZA, 15B or 15C of the RMA, as it is not in the exclusive economic zone or CMA – is not for the purpose of an offshore renewable energy project. No comments raised by parties invited to comment have indicated that the project would be ineligible for referral
The Minister must decline an application if the Minister considers they do not have adequate information to inform the decision [section 21(3)(c)]	We consider you have adequate information to inform your decision.
Relevant considerations and procedural requirements in Treaty settlement, Mana Whakahono ā Rohe, joint management agreement, or the Marine and Coastal Area (Takutai Moana) Act 2011 or the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 [section 16]	N/A

Section 22 assessment criteria

The project is an infrastructure or development project that would have significant regional or national benefits [section 22(1)(a)]

The Minister must consider a relevant Government policy statement (GPS) [s22(1A)]

The only current GPS is the Government Policy Statement on Grocery Competition. As this project does not involve a supermarket development or grocery-related activities, there is no GPS relevant to your decision.

The Minister may consider any of the following matters, or any other matters the Minister considers relevant:

The project has been identified as a priority project in a central or local government, or sector plan or strategy or a central government infrastructure priority list [s22(2)(a)(i)]

The application notes that the project is not explicitly listed as a priority in a central government, local government, or sector plan or strategy. The application considers that the project “fits well with the strategic intent and lens of the need to increase housing supply in the Christchurch Region. In this regard, the project aligns with the FTAA purpose of accelerating projects that deliver significant regional benefits”.

We do not recommend you refer the project in respect on this criterion. The proposal’s effect on housing supply is closely related to the criteria in section s22(2)(a)(iii), discussed below.

Will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020) [s22(2)(a)(iii)]

The project would supply approximately 510 additional houses in the vicinity of one of Christchurch’s existing growth areas. The majority of Canterbury residential projects either listed or referred under FTAA have a substantially higher residential yield than this. This project compares with two Listed projects in Canterbury (Grassmere Residential Development in Papanui, Christchurch - approximately 528 lots; and Birches Village, in nearby Prebbleton (Selwyn) - approximately 530 lots). Most other Canterbury residential projects listed or have ranges of around 650-1000 lots – but some are much larger (Gressons Road, Waimakariri – approximately 1500; Rolleston West, Selwyn – approximately 4,200). We consider the project can be referred on the basis that it ‘will increase the supply of housing’ to a similar level to other residential projects listed in the Act, albeit at the lower end of what has been referred in Canterbury to date.

We note that in November 2025, the Minister for RMA Reform approved Christchurch City Council’s request to withdraw part of Plan Change 14, on the basis that the council has provided 30 years of sufficient feasible housing capacity, with a 20 percent contingency margin. Our understanding is that provisions for that capacity have been accommodated in Christchurch District Plan zoning, which indicates that further residential intensification that is not enabled by the plan is unnecessary to ‘address housing needs’ (in terms of 30 year development capacity). In light of that, we are not confident that this project will address housing needs.

The project is a greenfield development on the edge of Christchurch’s existing urban area. The site immediately adjoins an existing residential development area to the east (Halswell) and a series of rural-residential allotments to the west. The project adjoins Christchurch Southern Motorway (State Highway 76) to the north, and would connect to two existing arterial roads which border the site (Springs Road to the northwest, and Halswell Junction Road to the east). Given the project location and proximity to arterial roads, it *may* be capable of contributing to a well-functioning urban environment, pending further information regarding infrastructure capacity, upgrades and funding that we recommend be required with any substantive application. However, CCC raised concerns regarding the existing infrastructure capacity which is currently inadequate to service out-of-sequence developments. To that extent, we are not confident at this stage that the project *will* contribute to a well-functioning urban environment.

Whitiora considered further information required on how the development will be supported by essential services, such as schooling, healthcare facilities, and public transport. We do not consider these to be reasons to decline to refer the project, but note these could be considered further through a substantive application process (for example, through an Integrated Transport Assessment).

We recommend you refer the project in respect to this criterion, on the basis that it will increase housing supply.

Will deliver significant economic benefits [s22(2)(a)(iv)]

The applicant’s economics assessment (Insight Economics) estimates the total development cost at \$318 million (including \$5m consenting, \$52m civil/infrastructure provision and \$261m residential construction).

The report estimates the following one-time effects associated with planning, infrastructure provision and residential construction, spread across a five-year development period:

- annual employment: estimated 266 annual FTEs (81 direct, and 185 indirect)
- total wages and salaries: approximately \$114 million
- total gross domestic product boost: approximately \$191 million.

The economics report considers these to be a “significant injection of activity into the regional economy”. The report assumes 80% of these impacts would accrue in the Canterbury region. The report notes its limitations (section 4.3), and notes these should be viewed as indicative estimates rather than precise forecasts. No commenters provided any peer review, or any statement of endorsement or opposition to the conclusions of the applicant’s economics report.

The report also identified a number of wider economic benefits, though these effects were not directly quantified:

- support for nearby centres
- strong spatial match with employment
- higher and better use of land
- investment signal effects.

The report also:

- noted foregone annual rural production as an economic cost, which they consider to be minimal (0.66 FTE, \$127,900 GDP annually).
- considered the wider infrastructure servicing cost and risk to be minimal, based on an expectation that that the applicant would fund and deliver all site infrastructure works and connections, and development contributions would be used to recover costs for off-site upgrades.

CCC noted in relation to the quantification of the proposed benefits, it does not appear that cost has been appropriately addressed to provide context. CCC suggested a condition be included requiring a further assessment of the project's net benefits, factoring in impacts of potential displacement of development from other growth areas, and the costs of additional infrastructure required to service the development. We note there is no obligation under the FTAA to consider cost-benefit analysis, or 'net benefits', in order to determine whether the project will in itself deliver significant economic benefits.

We do not recommend you require a cost-benefit analysis be provided with a substantive application, but do recommend the applicant to provide more detail about the infrastructure upgrades required to service this out-of-sequence development. That would provide a basis for the to the expert panel, council and other commenters about the infrastructure impacts and potential conditions to ensure the project follows a 'growth pays for growth' approach. Potential transfer/displacement or effects regarding other planned growth areas could also be considered as potential impacts of the project through a substantive application process, if demonstrated through comments or evidence.

We recommend you refer the project on this criterion on the basis of regionally significant economic benefit over its construction period, based on the conclusions of the applicant's economics report.

Will support climate change mitigation, including the reduction or removal of greenhouse gas emissions [s22(2)(a)(vii)]

The applicant considers that the project supports climate change mitigation through:

- the project's design and location encouraging active transport
- the building and infrastructure design can be energy-efficient and comply with the current Building Code requirements, with the opportunity to integrate renewable energy solutions and low-emissions technologies
- coordinated provision of three-waters and other infrastructure services also enables more efficient and lower-emission servicing compared to dispersed development patterns.

As a greenfield residential development, we do not see this project as directly reducing or removing greenhouse gas emissions compared to a status quo baseline.

We agree that, due to its proximity to existing infrastructure and services, the project may be more likely than others to promote integration with active and public transport, and may require less construction emissions per household than some other projects to build necessary servicing infrastructure onsite. However, the application does not quantify greenhouse gas reduction or removal attributable to this project.

We do not recommend you refer the project on this criterion.

Is consistent with local or regional planning documents, including spatial strategies [s22(2)(a)(x)]

Greater Christchurch Spatial Plan

- The applicant has noted that the plan identifies Halswell as having experienced significant residential growth over the past decade and continues to function as an important greenfield growth area within Christchurch's south-western urban sector. The applicant highlights that the project is located directly adjacent to the existing residential urban area and forms part of the logical outward expansion of Halswell. The applicant considers that the project aligns with the spatial planning direction for Greater Christchurch by enabling planned, infrastructure-supported urban growth contiguous with the existing urban environment.
- CCC considered the project inconsistent with this document

Canterbury Regional Policy Statement (CRPS):

- The applicant believes that the project is consistent with the CRPS as it; enables housing growth within a logical and contiguous expansion of the Halswell urban area; supports a consolidated and well-planned urban form within Greater Christchurch; Promotes integrated planning of land use, transport and infrastructure networks; and manages the urban-rural interface more effectively than dispersed rural-residential development.
- CRC commented that, overall the proposal appears to be broadly consistent with the CRPS, subject to adverse effects being appropriately avoided, remedied, or mitigated/controlled. CCC considered commented it considered the project inconsistent with the CRPS.

Canterbury Land and Water Regional Plan (CLWRP)

- The applicant has completed an assessment against the CLWRP and considers that the project upholds the CLWRP by adopting an integrated, infrastructure-led and environmentally responsive design. The applicant has stated that any potential adverse effects on freshwater systems, natural hazards and land quality can be appropriately avoided, remedied or mitigated.
- CRC commented that, 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.

Christchurch District Plan (CDP)

- The applicant has completed an assessment of the project against the CDP and believes that the project is consistent with the Objectives and Policies of the CDP as it enables an increase in housing capacity on land contiguous with the existing Halswell urban area, contributing to meeting anticipated housing demand and supporting a well-functioning urban environment.
- CCC commented that the project is inconsistent with the CDP, and that outside of Fast-track the project would likely require a private plan change to the CDP.
- We note, the project has non-complying activity status under the CDP, being zoned in the Rural Urban Fringe Zone. It is possible that a decision maker might consider the project to be consistent with the objectives and policies of that document, however non-complying activity status in itself suggests the that residential development of this density is not envisaged by the relevant district plan in this location.

Conservation General Policy 2005 and Canterbury (Waitaha) Conservation Management Strategy 2016

- DOC noted the project is not inconsistent with the relevant statutory planning provisions. However, consideration should be given to:
 - o Maintaining and restoring the ecological integrity of relevant ecosystems and habitat types;
 - o 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. Mahaanui Iwi Management Plan 2013 (IMP) - The applicant has completed an assessment against the IMP and considered that the project is consistent with the objectives and policies. The applicant considers that the project provides an opportunity to enhance riparian condition, improve stormwater management, protect groundwater, maintain fish passage and recognise cultural values within the Huritini catchment. - Mahaanui comments suggested some technical recommendations to promote alignment with the IMP. These matters could be addressed further through a substantive application process. Overall, <u>we do not recommend you refer the project on this criterion</u>. We note the applicant would be required to include an assessment of the project against these documents in any substantive application, should the project be referred (under clause 5(1)(h) of Schedule 5). <i>Any other matters that may be relevant [s22(2)(b)]</i> None identified
Referring the project to the fast-track approvals process [section 22(1)(b)]	<i>Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes [s22(1)(b)(i)]</i> As a non-complying activity, the RMA section 104D gateway test would not apply to this project, should it be referred to an expert panel. CCC noted the project would likely require a private plan change outside of the Fast-track process. Considering this aspect, along with the FTAA's lack of requirement for public notification, limited appeal rights, and 'one-stop-shop' aspect (allowing for RMA, Heritage, Wildlife and Freshwater Fisheries approvals through a single process), we consider that referral would enable the project to be processed in a more timely and cost-effective way than under normal processes. On their own, DOC expects the complex freshwater fisheries approval and wildlife permits would take approximately 3-4 months to approve. However, considered alongside the RMA approvals, the Act's one-stop-shop is likely to facilitate the project in a more timely and cost-effective way that dealing with each approval type individually under the relevant parent legislation. We note NZTA's feedback about the potential need for RMA section 176 approval from NZTA regarding the project in respect of the designation for State Highway 76/Christchurch Southern Motorway. Such approvals operate separately to FTAA, and this is not a constraint on referral (but may be a constraint to the developer's ability to deliver the project). We note also NZTA does not have any concerns about the application being referred. Given section 176 approval would be necessary regardless of which consenting pathway is taken (whether under the Fast-track process, or other pathways), we do not consider this impacts whether the Fast-track process would enable the project to be processed in a more timely and cost-effective way than under normal processes. <i>Is unlikely to materially affect the efficient operation of the fast-track approvals process [s22(1)(b)(ii)]</i> As a greenfield residential development, considered in context of wider recent development in the Halswell area, the project does not appear to raise any particularly novel issues. The referral application document discusses the project in respect of other recent panel decisions regarding highly productive land around Christchurch's rural urban fringe – this is a matter that can be considered in detail by an expert panel, should the project be referred. Subject to the provision of information we recommend you require (including in relation to infrastructure servicing requirements) to inform an expert panel's assessment, we do not consider the project raises any material issues that would affect the efficient operation of the fast-track process.
Reasons to decline	
Minister <u>must</u> decline [section 21(3)]	<i>The Minister <u>must</u> decline a referral application if:</i> <i>The application may not be accepted under subsection 1 (meets referral criteria)</i> We consider the application meets the referral criteria (as described above) <i>The Minister is satisfied the project involves an ineligible activity</i> The project does not involve any ineligible activities. <i>The Minister considers that they do not have adequate information to inform the decision under this section</i> We consider the information received by the applicant and commenters is adequate to inform your decision. We do not consider that you must decline the application under this section.
Minister <u>may</u> decline [section 21(4) and 21(5)(a-h)]	<i>The Minister <u>may</u> decline a referral application for any other reason, whether or not it meets the criteria in section 22.</i> <i>Reasons to decline a referral application under subsection 4 include, without limitation:</i> <i>The project would be inconsistent with a Treaty settlement, Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, Marine and Coastal Area (Takutai Moana) Act 2011, a Mana Whakahono ā Rohe, or a joint management agreement</i> We do not consider the project to be inconsistent with any of these matters <i>It would be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts</i> As an out of sequence development, CCC opposed the project proceeding through the Fast-track process, and considered it may be better suited to a private plan change process under the RMA, allowing for more holistic consideration of infrastructure issues. In that instance, Wildlife Act and Heritage New Zealand Pouhere Taonga Act approvals would also need to be authorised under other Acts.

Subject to conditions requiring the applicant to assess infrastructure capacity constraints (particularly in relation to CCC’s existing water and wastewater services), nothing in the application indicates it would be more appropriate to deal with the matters under another Act or Acts.

DOC considered it would be beneficial for the applicant to engage further with DOC on application needs prior to lodging a substantive application. While we agree it would be in the applicant’s interests to engage upfront as much as possible including with administering agencies (e.g. to reduce risk of a substantive application having information missing when lodged), further pre-lodgement engagement is not mandatory element of the Fast-track process and we do not consider there to be any special circumstances in this application that would warrant making this a condition of referral. The applicant can do so at its discretion.

The project may have significant adverse effects on the environment

Highly Productive Land: The project exists on highly productive land. The applicant has put forward a case for development of this particular area including consideration of provisions of the National Policy Statement for Highly Productive Land (NPS-HPL). We do not consider this is a barrier to referral of this application, and that the specifics of the project in relation to the NPS-HPL and other planning provisions (such as the National Policy Statement for Urban Development) would be well traversed through an expert panel process.

Transport: There are likely to be traffic impacts that an expert panel would need to consider through a substantive application. Traffic impacts should generally be considered as part of any assessment of environmental effects. However, in light of NZTA’s comments, we consider you should require an integrated transport assessment as a particular additional information requirement for a substantive application, particularly given the site’s direct proximity to the Christchurch Southern Motorway. We do not consider you need to specify this in detail (for example, mandating particular types of modelling), but that can be worked through by the applicant, and ultimately further information can be sought by an expert panel if the panel considers that necessary.

Given the immediate proximity of this project to State Highway 76, based on the information in the referral application, an expert panel would likely need to invite comment from NZTA on a substantive application for this project, under any or all of sections 53(2)(h), (i) or (l) (as requiring authority with a designation that relates to the land or is adjacent to the land, and/or as adjacent landowner/occupier). However, it is possible that the details of the project may be refined ahead of a substantive application, to the extent that existing section 53(2) provisions do not include NZTA. In our view, NZTA should be invited to comment on any substantive application for this project, given the project’s likely effects in relation to the State Highway (for example, traffic, direct impacts on the highway (e.g. potential stormwater overflow), and reverse sensitivity). We therefore recommend you specify NZTA as a party that an expert panel must invite comment from under section 53(n).

Stormwater: CCC and CRC both identified increased stormwater from the project could impact CCC’s ability to comply with its ‘global consent’ from CRC in response to flooding events. In this regard, CCC comments suggest the applicant would need to provide updated flood modelling using a 2% annual exceedance probability (i.e. 1-in-50 year event), 60 hour event, with a slow release period of 96 hours. We note FTAA already includes overall information requirements for resource consents (including considering risks to the neighborhood, wide community or environment through natural hazards, under Schedule 5 clause 7). In this instance, we recommend you require the applicant to provide further specific information with any substantive application particularly about stormwater management in relation to CCC’s existing global consent.

We have not identified any further significant adverse effects on the environment that would warrant declining this referral application beyond those already discussed in this briefing. Specific potential environment effects identified by commenters (for example, particular stream setback distances, contaminants, and ecology) can dealt with through a substantive application including a fulsome assessment of environmental effects that would be required.

The applicant(s) has a poor compliance history under a specified Act that relates to any of the proposed approvals

We have no evidence of poor compliance history for this applicant. The applicant declared there has been no compliance or enforcement action taken against it under a specified Act.

The project area includes land that the Minister for Treaty of Waitangi Negotiations considers necessary for Treaty settlement purposes

N/A

The project includes an activity that is a prohibited activity under the Resource Management Act 1991

The project has non-complying status under the Christchurch District Plan. No prohibited activities are identified.

A substantive application for the project would have one or more competing applications.

N/A

In relation to any proposed approval of the kind described in section 42(4)(a) (resource consents), there are one or more existing resource consents of the kind referred to in section 30(3)(a)

N/A

Any other matter

None identified

We do not recommend you decline the application

Appendix 1: Statutory framework summary

1. You are the sole decision maker for referral applications. If you accept a referral application, then the whole or part of the project will be referred to the fast-track approvals process.
2. If a Treaty settlement, the Marine and Coastal Area (Takutai Moana) Act 2011, the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, a Mana Whakahono ā Rohe or a joint management agreement provides for consideration of any document or procedural requirements, you must, where relevant:
 - a. give the document the same or equivalent effect through this process as it would have under any specified Act; and
 - b. comply with any applicable procedural requirements.
3. You must decline a referral application if:
 - a. you are satisfied the project does not meet the referral criteria in section 22
 - b. you are satisfied the project involves an ineligible activity (section 5)
 - c. you consider you do not have adequate information to inform your decision.
4. You may decline an application for any other reason, including those set out in section 21(5) and even if the application meets the section 22 referral criteria.
5. You can decline an application before or after inviting comments under section 17(1). However, if comments have been sought and provided within the required time frame, you must consider them, along with the referral application, before deciding to decline the application.
6. If you do not decline a referral application at the initial stage you must copy the application to, and invite written comments from:
 - a. the relevant local authorities
 - b. the Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development
 - c. any other relevant portfolio Ministers
 - d. the relevant administering agencies
 - e. the Māori groups identified by the responsible agency
 - f. the owners of Māori land in the project area (if applicable)
 - g. you may provide the application to and invite comments from any other person.
7. You can request further information from an applicant, any relevant local authority or any relevant administering agency at any time before you decide to decline or accept a referral application (see section 20 of the Act).
8. However, if further information has been sought and provided within the required time frame you must consider it, along with the referral application, before deciding to decline the application.