

Appendix 7: s53(2)(a) Fast-track Approvals Act 2024 (FTAA) Technical Advice

Date	12/10/2026
To	Consents – Fast-track
Expert Name and Job Title	Matt Riddle, Senior Scientist – Land Resources Science, Canterbury Regional Council
Project advice provided for	Carter Group Limited - Ōhoka Residential Subdivision
Documents referred to	Highly Productive Land and Soils Assessment – C25C/157916 Dewatering and Dust Suppression Assessment of Environmental Effects. PDP. April 2026 Infrastructure Report. INOVO. 12 August 2025. Site Management Plan. INOVO. 12 August 2025 / Final V4 10 June 2026 Fast-track Approval Application- June 2026 Ohoka Fast Track Application- Assessment of Potential Loss of Productive Land. Reefside Environmental & Projects. 20 May 2026 Dewatering and Dust Suppression Assessment of Environmental Effects. PDP. May 2026 Assessment of Economic Costs. Savvy Consulting. June 2026
Qualifications	I am employed by Canterbury Regional Council as a Senior Scientist in the Land Resources Team. I have held this position since 11 April 2019. I hold a Bachelor of Agricultural Science degree from Lincoln University, a Master of Science in Soil and Water Quality from the Swedish University of Agricultural Sciences, and a PhD in Soil Science, also from the Swedish University of Agricultural Sciences. I am a member of the New Zealand Society of Soil Science. I am also a member of the Land Monitoring Forum (LMF); a national Special Interest Group (SIG) of regional council technical experts within the land and soil subject area.
Code of Conduct	I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This technical report has been prepared in accordance with that Code. In particular, unless I state otherwise, the opinions I express are within my area of expertise, and I have not omitted to consider material facts that might alter or detract from the opinions that I express.

Introduction/ Executive Summary

1. The matters that were presented in my S46 report are still current under this report as there has been no further information provided by the applicant regarding them. For convenience I have listed these below:
2. The Land Use Capability (LUC) soil classes on the site are 2 and 3. Classes 1,2 and 3 are currently classified as highly productive land or versatile soils. Utilising the currently proposed site for a residential subdivision would result in a permanent loss of 154 ha of primary production land.
3. Suggestion that the current land use of dairy farming is uneconomic is not within scope of my expertise, however I disagree with the practical farming arguments put forward by the consultant.
4. Potential for construction stage groundwater from dewatering processes to be discharged via temporary excavations direct to gravel strata. This will bypass the poorly drained soil but will also bypass the filtering ability of the soil for any contaminants that will otherwise risk entering shallow groundwater.

Discussions with the applicant

5. I have not been involved in any communication with the applicant on this matter.

Outstanding areas of contention and significance

Outstanding areas of contention 1

6. Highly Productive Land and Soils Assessment

The soils on the site are Land Use Capability (LUC) 2 and 3. Classes 1,2 **and 3** are currently classified as highly productive land or as versatile soils. These soils have therefore been identified as having value for agriculture, horticulture and forestry production for both fibre and food. This value also includes the suitable climate present at the site. Granting this application would therefore remove ~154.4 ha of highly productive land from potential production.

Significance of this matter

7. The current zoning the land in question is outside the scope of my expertise. However, the soils are LUC class 3 and 2, which are classified as highly productive or versatile soils, and the land is currently mainly used for dairy farming. There is irrigation and the land is productive. Therefore, in terms of their use for primary production purposes, this land is more than capable of fulfilling that potential.
8. I will point out that the consultant suggests the productivity of the soil is strongly influenced by the poor drainage of the soil. However, there are drainage channels over the current properties which help reduce this impact. There is also irrigation

infrastructure within the proposed site boundaries, which indicates water shortage during the growing season also occurs and is not a year round issue.

Solution

9. The only obvious solution is not granting this consent.

Outstanding areas of contention 2

10. Dewatering from excavation activities potentially discharged to land

Currently several alternatives are proposed to return dewater from excavation activities to surface waters or to ground. If the discharge quality is sufficient (I will leave comment on this to the surface water scientist). Otherwise, a second proposal is to discharge to temporarily exposed gravel layers.

Significance of this matter

The soils on site are poorly drained, removing the topsoil and B horizon will improve infiltration of the discharge to ground. However, removing the soil also removes a high proportion of the filtering abilities that the soil does, through removing contaminants before returning discharge to potentially shallow groundwater.

Solution

11. A third suggestion of the proposal mentions the possibility of returning the dewatering discharge to onsite Stormwater Management Area's (SMA's). I would consider this pretreatment which would allow settling of sediment and attached contaminants is better suited at least as an initial primary treatment method before determining if water quality is satisfactory for discharging to ground.

Outstanding areas of contention 3

12. Assessment of Economic Costs

The applicant has suggested that the current land use of dairy farming, on this site is uneconomic. Determining this is not within scope of my expertise. However, within the document the consultant suggests the stocking rate is low, at around 1.53 cows/ha. This is well below the Canterbury average of 3.3 cows/ha. If the reason for this low stocking rate is due to the poor draining soil and potentially low over wintering ability on the property, this is not necessarily a problem that can't be solved. Many dairy farms graze stock off farm during the winter period. Alternatively, feeding pads or even herd homes

are becoming more common in Canterbury to help alleviate the pressure of stock on wet soils causing infiltration and general soil structure damage.

Significance of this matter

13. I don't consider the reasons given by the applicant makes the current land use uneconomic and therefore this reason is not a valid basis to grant the consent.

Solution

14. N/A

Benefits of the project

15. There are no specific benefits with respect to my area of expertise.

Fast Track Approvals Act 2024 (FTAA) Technical Advice

Ōhoka Residential Development – Land Resources

Date	23/04/2026 6/07/26 updates in blue
To	Joanne Mitten, Principal Consents Planner, Environment Canterbury, cc Samuel Prystupa, Consents Planner, Environment Canterbury
From	Matt Riddle, Senior Scientist – Land Resources Science, Environment Canterbury
Project advice provided for	Carter Group Limited - Ōhoka Residential Subdivision
Documents referred to	Highly Productive Land and Soils Assessment – C25C/157916 Dewatering and Dust Suppression Assessment of Environmental Effects. PDP. April 2026 Infrastructure Report. INOVO. 12 August 2025. Site Management Plan. INOVO. 12 August 2025 / Final V4 10 June 2026 Fast-track Approval Application- June 2026 Ohoka Fast Track Application- Assessment of Potential Loss of Productive Land. Reefside Environmental & Projects. 20 May 2026 Dewatering and Dust Suppression Assessment of Environmental Effects. PDP. May 2026 Assessment of Economic Costs. Savvy Consulting. June 2026
Qualifications	I am employed by Canterbury Regional Council as a Senior Scientist in the Land Resources Team. I have held this position since 11 April 2019. I hold a Bachelor of Agricultural Science degree from Lincoln University, a Master of Science in Soil and Water Quality from the Swedish University of Agricultural Sciences, and a PhD in Soil Science, also from the Swedish University of Agricultural Sciences. I am a member of the New Zealand Society of Soil Science. I am also a member of the Land Monitoring Forum (LMF); a national Special Interest Group (SIG) of regional council technical experts within the land and soil subject area.
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Executive summary/overview

1. I have reviewed the following documents

- Highly Productive Land and Soils Assessment – C25C/157916
- Dewatering and Dust Suppression Assessment of Environmental Effects. PDP. April 2026
- Infrastructure Report. INOVO. 12 August 2025.
- Site Management Plan. INOVO. 12 August 2025 / [Final V4 10 June 2026](#)
- [Fast-track Approval Application- June 2026](#)
- [Ohoka Fast Track Application- Assessment of Potential Loss of Productive Land. Reefside Environmental & Projects. 20 May 2026.](#)
- Dewatering and Dust Suppression Assessment of Environmental Effects. PDP. May 2026
- [Assessment of Economic Costs. Savvy Consulting. June 2026](#)

In summary

The subject site is approximately 154.4 ha of gently sloping dairy farmland located north-west of Kaiapoi, bounded by Whites Road, Bradleys Road and Mill Road. The application proposal includes a multitude of residential properties, a retirement village, industrial area and polo grounds. Two waterbodies pass through the site, the Ohoka Stream at the northern end and the Ohoka South Branch Stream that passes near the middle of the site. There are also two springs located within the site that are drained by two channels ending at open drains.

Soil on the site is a mixture of poorly drained Gley soils with ~40 cm topsoil, with an underlying layer of clay and silt between 0.5 to 1.2 m. Under this are sandy gravels greater than 30 m deep.

The Land Use Capability (LUC) soil classes on the proposed site are 2 and 3. Classes 1,2 and 3 are currently classified as highly productive land or versatile soils. I suggest that utilising the currently proposed site for a residential subdivision would result in a permanent loss of 154 ha of primary production land.

[Suggestion that the current land use of dairy farming is uneconomic is not within scope of my expertise.](#)

There is adequate initial methodology in place to minimise erosion, sediment deposition and dust production during the construction phase. [Follow up, more detailed methods are proposed to be supplied by the contractor, once appointed, before excavation begins.](#)

~~Discharge from dewatering facilities on site to land will likely not be suitable during wetter periods due to reduced soil infiltration rates on the poorly drained soils present on site.~~

[One suggested method to discharge groundwater from dewatering processes, is via temporary excavations direct to gravel strata. This will bypass the poorly drained soil but will](#)

also bypass the filtering ability of the soil for any contaminants that will otherwise risk entering shallow groundwater. This process should be reviewed further.

Draft Review Consultation and Preapp

2. Agreement with the Applicant

Dewatering and Dust Suppression Assessment of Environmental Effects

I mostly agree that discharging dewatering flows to ground (interpreted as to the soil surface) will allow for filtering of contaminants from the water before reaching groundwater.

I agree that no dewatering discharges should occur (to land) within the Community Drinking Water Protection Zone (CDWPZ)

I agree that the use of dust suppression in the form of water tankers spraying water over the active construction site will be important to reduce wind erosion of exposed and disturbed soil.

I agree that vehicle loading and unloading operations shall occur during times of low wind velocity wherever possible. If the earthworks need to occur during periods of high wind velocity, then the material is to be wetted to prevent the discharge of dust beyond the boundary.

I agree that water carts should be kept onsite for use as required. Use of irrigation systems to keep haul roads and exposed areas wetted should be implemented as required.

I agree that stockpiles of soil shall not exceed a maximum height of 10 metres. This will help with reducing aeolian loss of soil.

I agree that irrigation or application of mulch or stabilising polymer dust suppressants should be used to control dust generation from stockpiles.

Infrastructure Report

This is not an agreement, but an acknowledgement from a prior question I had which queried where wastewater from the proposed dwellings was going to be treated. This report identifies the wastewater will be processed at the Rangiora Wastewater Treatment Plant. I will not comment on the proposal, only to say that there will be no extra loading of nutrients to ground at the proposed site from any on site wastewater treatment systems (septic tanks).

Site Management Plan

I agree that superficial (<200 mm soil disturbance) should be re seeded as soon as practicable after completion of earthworks.

I agree that topsoil bunds should be built around completed lot areas to contain stormwater within those areas until grass is established.

I agree that a more detailed design of each earthworks stage should be documented prior to construction occurring on that piece of land. This will help ensure a reduced risk of soil erosion and deposition into the water bodies present on the site.

I agree that environmental control measures should be assigned to particular consultants/people to ensure ownership of outcomes during the different stages of the project.

I mostly agree there will be a suitable Erosion Sediment and Dust Control Programme (ESDCP) in place on the site that will minimise soil/sediment loss during the construction phase of the project.

I agree that the ECan Erosion Sediment Control Toolbox has been utilised to identify suitable practices to minimise sediment loss from the site during construction.

I agree that the general guidelines for the dewatering that will occur on site are to the standard set out in the Environment Canterbury Toolbox guidelines.

I agree that a more detailed dewatering methodology is required by the contractor when appointed.

I agree there that there should be initial minimum setbacks and diversion bunding installed around the springs and waterbodies on the site to protect from stormwater runoff, erosion and sediment loss during the construction phase.

I agree that the ESCDP plan and proposed measures should be reviewed and updated to reflect changes to construction sequencing, weather changes, and effectiveness with input from the contractor completing works on site.

I agree that the Inspection and Monitoring Programme shall be detailed and fit for purpose to ensure any issues that arise are picked up and communicated to the people who can act on the issue quickly.

I agree that the ESCDP should state the frequency and methodology of how the ESCDP measures will be checked, who is responsible for undertaking these checks, how the findings are recorded, reported, and assessed. This should include checks that will be needed during and after rainfall events and to accommodate any times that the site will be unattended, including weekends.

I agree that the ESCDP measures to be inspected at least once a week and after each rainfall event >5mm. Amendments and additions to be made where necessary.

I agree that sediment build-up in front of treatment areas and devices or any other area shall be monitored and removed when necessary.

I agree that the contractor's role should be included in the construction contract documents and should include.

- o Periodic reviews of the ESCDP measures and reporting to the engineer.
- o Review of construction sequencing.
- o Review weather conditions and amend ESCDP measures to suit.
- o Any repairs to the ESCDP measures shall be affected urgently by the contractor.

I agree that it remains the contractor's responsibility to ensure that sediment is not discharged from the site as a result of their activities. Should it become evident that the control measures specified in this document are failing to prevent erosion or sediment discharge, then the contractor shall implement further mitigation measures.

Consent conditions I agree with:

Excavation/Earthworks consent

5. 'All erosion and sediment control measures detailed in the ESCP must be installed prior to the commencement of any earthworks or stripping of vegetation and topsoil occurring on the site.'

11.c. Stockpiled material must be covered or dampened during dry and windy conditions so as to prevent wind erosion; and

Benefits of the project

3. Outstanding areas of contention and significance of these

Highly Productive Land and Soils Assessment

The soils on the site are Land Use Capability (LUC) 2 and 3. Classes 1,2 **and 3** are currently classified as highly productive land or as versatile soils. These soils have therefore been identified as having value for agriculture, horticulture and forestry production for both fibre and food. This value also includes the suitable climate present at the site. Granting this application would therefore remove ~154.4 ha of highly productive land from potential production.

Reeftide Environmental & Projects indicated that ‘*..the RPS recognises LUC 1 and 2 class soils as versatile and that these soils support the widest range of productive uses with the least inputs. The NPS-HPL requires regional councils to map LUC 1, 2 and 3 soils as highly productive land. In this instance, the Regional Council has mapped, but not notified, highly productive land and an interim definition applies as per clause 3.5(7) of the NPS-HPL. As per that definition, the site land is not classified as highly productive land because it is not zoned general rural or rural production.*

I do not know what current zoning the land in question has, and I will not go into this, as it is outside the scope of my expertise. However, the soils are LUC class 3 and 2, which are classified as highly productive or versatile soils, and the land is currently mainly used for dairy farming. There is irrigation and the land is productive. Pg 115/227 AEE. Therefore, in terms of their use for primary production purposes, this land is more than capable of fulfilling that potential.

I will point out that the consultant suggests the productivity of the soil is strongly influenced by the poor drainage of the soil. However, there are drainage channels over the current properties which help reduce this impact. There is also irrigation infrastructure within the proposed site boundaries, which indicates water shortage during the growing season also occurs and is not a year round issue.

Site Management Plan

The Sediment Removal Pond (SRP) is to be constructed to catch runoff from 5 ha of land at any one time although up to a 10-ha catchment will feed the pond. The pond will have a volume of 1,500 m³. Once soils are saturated, this is enough to hold a 15 mm rainfall event. However, determination of the relevant capacity requirements of such a pond are outside my area of expertise. ~~Where will the pond(s) discharge to once they overflow?. I have not identified this in the proposal.~~ The collected drainage water will flow to designated drains dependant on the construction stage, therefore discharge to land and infiltration ability of the Gley soil is no longer relevant. ~~The depth of topsoil is identified as ~40 cm, with an underlying clay/silt layer of up to 30 m. Under this are sandy gravels. As the soils are poorly drained Gley soils, gravity based infiltration into the soil surface will be slow, if negligible, during periods where soil moisture levels are already high, i.e. during late autumn through spring. However, the soil has a high bypass flow risk and therefore, under high water application rates and/or high soil moisture conditions the application rates of dewatering water need to be considered. Any resulting bypass flow will increase the risk of nutrients and/or contaminants from the soil surface bypassing the filtering ability of the soil matrix and reaching groundwater faster through larger soil macropores. Disposal to drains or streams is therefore likely to occur. I will leave comment on this to the surface water scientist.~~

Dewatering and Dust Suppression Assessment Report PDP May 2026

Dewatering from excavation activities on site are proposed to be returned to surface waters if the discharge quality is sufficient (I will leave comment on this to the surface water scientist). Otherwise, a second proposal is to discharge to temporarily exposed gravel layers. As the soils on site are poorly drained, removing the topsoil and B horizon will improve infiltration of the discharge to ground. However, removing the soil also removes a high proportion of the filtering abilities that the soil does, through removing contaminants before returning discharge to potentially shallow groundwater.

A third suggestion of the proposal mentions the possibility of returning the dewatering discharge to onsite Stormwater Management Area's (SMA's). I would consider this pretreatment which would allow settling of sediment and attached contaminants is better suited at least as an initial primary treatment method before determining if water quality is satisfactory for discharging to ground.

Assessment of Economic Costs

The author has suggested that the current land use of dairy farming, on the site is uneconomic. Determining this is not within scope of my expertise. However, within the document the consultant suggests the stocking rate is low, at around 1.53 cows/ha. This is well below the Canterbury average of 3.3 cows/ha. If the reason for this low stocking rate is due to the poor draining soil and potentially low over wintering ability on the property, this is not necessarily a problem that can't be solved. Many dairy farms graze stock off farm during the winter period. Alternatively, feeding pads or even herd homes are becoming more common in Canterbury to help alleviate the pressure of stock on wet soils causing infiltration and general soil structure damage.

Consent conditions not agreed with:

Construction Phase stormwater and minor contaminants discharges to surface water and land

4. C.ii. All other dewatering water may be discharged to ground.
I disagree that this is good practice, as contaminants will bypass the filtering ability of the soil and risk direct contact with groundwater.

