

28 July 2026

Keely Paler
Application Lead - Fast-track Application
Fast-track Applications
Environmental Protection Authority
info@fasttrack.govt.nz



Customer Services
P. 03 353 9007 or 0800 324 636

PO Box 345
Christchurch 8140

P. 03 365 3828
F. 03 365 3194
E. ecinfo@ecan.govt.nz

www.ecan.govt.nz

Dear Keely,

Thank you for your letter dated 21 July 2026, regarding the Bangor Village proposal from Hughes Developments Ltd.

Please find below the response from the Canterbury Regional Council (CRC) on considerations of the completeness of the Applicant's Substantive Application under the Fast-track Approvals Act 2024 (FTAA).

SUMMARY AND KEY CONCERNS

CRC has undertaken a completeness check of the application and is of the view that the application is not complete. CRC's assessment (Attachment 1) demonstrates that additional information is required to meet the criteria of s46. Advice from CRC's technical experts (Attachment 3) contributed to this conclusion. Specifically, the application doesn't include the following;

1. The identification of all necessary consents;
2. Assessment of flood effects for surrounding sites;
3. Detailed calculations of stormwater management facilities;
4. Full investigation of existing contaminated areas at site; and
5. A Draft Remedial Action Plan for addressing existing areas of contamination.

However, CRC has raised this with the Applicant, and the Applicant has stated to CRC that they will address these information gaps. CRC agree with the Applicant that this would be achievable through the FTAA process and would be willing to work collaboratively with the Applicant to achieve this. Additionally, despite not identifying all necessary consents, the application has considered the effects of the activities requiring consent, although conditions may need refinement.

Therefore, while the application is missing information required by s43 of the FTAA and is therefore incomplete, CRC considers that the Applicant would be able to provide the missing information while still progressing through the Fast-track process within the timeframes allowed under the FTAA.

We trust that this information assists you determining the completeness of the application regarding the Fast-track Bangor Village proposal from Hughes Developments Ltd, under section 46(1) of the Act.

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

Ngā mihi,

A handwritten signature in black ink, appearing to read 'Joanne Mitten', with a stylized flourish at the end.

Joanne Mitten

Principal Consents Planner

LIST OF ATTACHMENTS

Attachment 1: Canterbury Regional Council comments under s46 FTAA

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

Attachment 3: CRC Technical Advice Summary

Attachment 4: CRC Section 30 Letter of 29 June 2026

ATTACHMENT 1: CANTERBURY REGIONAL COUNCIL COMMENTS UNDER S46 FTAA - BANGOR VILLAGE

Specific questions from the EPA

Please confirm the written notice under section 30(3)(b)/30(5), dated 29 June 2026, prepared by Canterbury Regional Council remains accurate and final at the time of receiving this letter.

CRC can confirm that the information contained in the written notice dated 29 June 2026 remains accurate as at the date of this letter. A copy of the written notice is provided as Attachment 024 of the application and as Attachment 4 below.

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

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

The application has identified the following consent requirements under the RMA that would be administered by CRC under the above plans:

- a. Land Use Consent - RMA s9 - Excavations over an aquifer - LWRP Rule 5.176
- b. Discharge Permit - RMA s15 - Construction-phase stormwater discharge to land - LWRP Rule 5.94B
- c. Discharge Permit - RMA s15 - Operational stormwater discharge to land – LWRP Rule 5.93

These three consents are restricted discretionary activities. The applicant has not specified a duration sought for these consents.

The application has not identified the following further consents required from CRC for the activities detailed in the application. Based on the information available in the application, the following consents would also be required from CRC:

- a. Water Permit – RMA s14 – Take and use of surface water – LWRP Rule 5.126
- b. Discharge Permit – RMA s15 – Discharge of water to land – LWRP Rule 5.126

These consent requirements arise from the realignment and naturalisation works proposed on the water races (irrigation races) running through the site. The conditions proposed by the applicant (Attachment 7) include conditions related to these consent requirements, including reference to over-pumping of water races (i.e., take and use of surface water) and discharge of that water into the water race.

In addition to the above requirements, an additional resource consent may be required if the damming of the water race(s) would occur over contaminated or potentially contaminated land:

- a. Water Permit – RMA s14 – To dam surface water – LWRP Rule 5.155

While the requirement for these additional resource consents has not been identified in the application, the effects of water race realignment have been considered in the application. The Applicant's proposed conditions (Attachment 007) include conditions around fish passage and erosion and sediment control, as well as mention of "over pumping" of the water race during construction.

As such, it is considered that the application has considered the effects of the activities requiring consent, including proposing relevant conditions. However, refinement of conditions to fully account for additional resource consents required.

CRC has contacted the Applicant's consultant, who acknowledges the requirement under Rule 5.126 and is committed to providing any further material required to address that requirement.

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

Section 42 – Authorised person may lodge substantive application for approvals

Leaving comment on s42(2) (the s43 requirements) to the section below, CRC considers the application to be compliant with s42(1) and s42(3)-(13).

Section 43 – Requirements for substantive application

FTAA s43(3)(a) requires that applications for a resource consent contain the information required in clauses 5 to 9 of FTAA Schedule 5 (Sch 5). Comment on the information provided in relation to s43 and Sch 5 is provided below.

CRC technical staff have assessed the application documents and provided advice on the completeness of the information provided. That advice has informed the assessment against FTAA s43, which is summarised below and is provided in full in Attachment 3.

Information that CRC considers is lacking or could be clarified to meet FTAA s44 are listed below:

1. Assessment of flood effects for surrounding sites [Sch 5 - 5(4)(a) / (b)];
2. Detailed calculations of stormwater management facilities [Sch 5 - 6(1)(a)/(d) and 7(a)/(c)/(e)];
3. Full investigation of existing contaminated areas at site [Sch 5 - 6(1)(a)/(d) and 7(a)/(c)/(e)];

4. Draft Remedial Action Plan for addressing existing contaminants [Sch 5 - 6(1)(a)/(d) and 7(a)/(c)/(e)]

While the above information will be required to assess the effects of the proposal, CRC technical experts consider that the information could be provided by the applicant during the Fast-track process. CRC has had confirmation from the Applicant that such information would be provided.

Schedule 5(1)(f) requires consent applications to include:

a description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates;...

As detailed above, the application does not include a full description of the resource consents required to undertake the proposed activities. However, no further substantive assessment would be required to understand the effects of these activities, and the applicant has already proposed management conditions. It is expected that the applicant could reasonably propose appropriate conditions for the additional consent(s) during the Fast-track process.

Summary of s42-43 assessment

Overall, it is considered that while the application is missing some information required by FTAA s43, CRC considers that the proposal would be able to provide the missing information while still progressing through the Fast-track process within the timeframes allowed under the FTAA. The Applicant has stated to CRC that they will address the information gaps moving forwards.

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

Consultation

Attachments 014 and 016 of the application outlines consultation with multiple parties including:

- a. Relevant iwi authorities
- b. Waka Kotahi – New Zealand Transport Agency
- c. Selwyn District Council
- d. CRC
- e. Department of Conservation
- f. Adjacent landowners and occupiers
- g. KiwiRail
- h. Fonterra

However, after early engagement on the referral application with CRC, the Applicant did not continue engagement with CRC and CRC was not able to review any draft substantive application documents. As such, CRC was not able to provide any further technical advice to the applicant since the s17 referral engagement. CRC also note that the information provided at s17 did not contain sufficient information to accurately confirm all resource consent requirements.

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

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	CRC Comment on whether this has been provided
5(1)(a)	A description of the proposed activity.	Yes – Substantive Project Assessment
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to— i. a statutory area (as defined in the relevant Treaty settlement Act); or ii. ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011.	Yes - In Substantive Project Assessment, Attachment 001 - Subdivision Plans,
5(1)(c)	Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being: • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid. <i>Guidance note: Section 46 provides for the EPA to decide whether the substantive application is complete and within scope. The EPA will need to be satisfied that the application complies with these requirements. These matters are addressed throughout the substantive application form and relevant checklist.</i>	Not complete – Substantive Project Assessment As assessed in Attachment 1 – further information is required to assess the effects of the proposal. CRC considers that this can be addressed by the Applicant moving forward, and the Applicant's consultant has confirmed their intention to address this matter.

5(1)(d) and 5(6)	The full name and address of— iii. each owner of the site and of land adjacent to the site; and iv. each occupier of the site and of land adjacent to the site whom the Applicant is unable to identify after reasonable inquiry; If the Applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the Applicant must include a statement to that effect (clause 5(6)).	Yes – Substantive Project Assessment and Attachment 014.
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates.	Yes – Substantive Project Assessment
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates.	Yes – Substantive Project Assessment
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991.	Yes – Substantive Project Assessment
5(1)(h) (and also clause s 5(2) and 5(3))	An assessment of the activity against any relevant provisions in any of the following documents: • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement: • a regional policy statement or proposed regional policy statement: • a plan or proposed plan: • a planning document recognised by a relevant iwi authority and lodged with a local authority.	Yes – Substantive Project Assessment and Attachment 018

	This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being: - any relevant objectives, policies or rules in the documents listed; and - any requirement, condition, or permission in any rules in any of those documents; and any other requirements in any of those documents.	
5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including— v. identification of the relevant provisions in those Treaty settlements; and a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area.	Yes – Substantive Project Assessment
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or Applicants under the Marine and Coastal Area (Takutai Moana) Act 2011.	N/A – Substantive Project Assessment
5(1)(k)	The conditions that the Applicant proposes for the resource consent.	Yes. Conditions for CRC consents provided in Attachment 007.
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— vi. a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and if a notice has been received under section 30(5), any more up-to-date information that the Applicant is aware of about the existing resource consent referred to in the notice.	Yes – Substantive Project Assessment and Attachment 024. s30 letter dated 29 June 2026, which is within the time frame specified in section 30(6)(b).

5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6. <i>Guidance note: See rows below for requirements in clause 6.</i>	Not complete – Substantive Project Assessment and various attachments. Information assessing potential flood hazard effects and flood management would be required but have not been provided. Additional assessment of the contaminants present on the site and a draft Remedial Action Plan to manage contamination would be required but has not been provided. CRC considers that this can be addressed by the Applicant moving forward, and the Applicant's consultant has confirmed their intention to address this matter.
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7. <i>Guidance note: See rows below for requirements in clause 7.</i>	Not complete – Substantive Project Assessment and various attachments. Information assessing potential flood hazard effects and flood management would be required but have not been provided. Additional assessment of the contaminants present on the site and a draft Remedial Action Plan to manage contamination would be required but has not been provided. CRC considers that this can be addressed by the Applicant moving forward, and the Applicant's consultant has confirmed their intention to address this matter.
6	(1) The assessment of an activity's effects on the environment must include the following information: (a) an assessment of the actual or potential effects on the environment: (b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use: (c) if the activity includes the discharge of any contaminant, a description of— (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and	Not complete – Substantive Project Assessment and various attachments. Information assessing potential flood hazard effects and flood management has not been provided to the detail required. Additional assessment of the contaminants present on the site and a draft Remedial Action Plan to manage contamination would be required but has not been provided. CRC considers that this can be addressed by the Applicant moving forward, and the Applicant's consultant has confirmed their intention to address this matter.

	(ii) any possible alternative methods of discharge, including discharge into any other receiving environment: (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity: (e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal: (f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision: (g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved: (h) an assessment of any effects of the activity on the exercise of a protected customary right. <i>Guidance note: Clause 6(2) provides that a consent application need not include any additional information specified in a relevant policy statement or plan that would be required in an assessment of environmental effects under clause 6(2) or 7(2) of Schedule 4 of the Resource Management Act.</i>	
7	The assessment of an activity's effects on the environment must cover the following matters: (a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: (b) any physical effect on the locality, including landscape and visual effects:	Not complete – Substantive Project Assessment and various attachments. Information assessing potential flood hazard effects and flood management would be required but have not been provided. Additional assessment of the contaminants present on the site and a draft Remedial Action Plan to manage contamination would be required but has not been provided.

	(c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity: (d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations: (e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: (f) any unreasonable emission of noise: (g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.	CRC considers that this can be addressed by the Applicant moving forward, and the Applicant's consultant has confirmed their intention to address this matter.
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991).	Yes – Substantive Project Assessment and Attachment 025
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document.	N/A – Substantive Project Assessment
5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaimai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	N/A – Substantive Project Assessment

ATTACHMENT 3: CRC TECHNICAL ADVICE

Table 1. Summary of Technical Advice

Technical Team	Technical expert considers all expected technical reports are provided	Technical expert has identified gaps in the provided technical reports	Comments; Key Findings & Concerns
Contaminated Land	Yes	Yes	Further investigation of contaminated sites is required including underground storage tank, offal pits, stockpiles, and historical building areas. A draft Remedial Action Plan and requirement for a Site Validation Report also required, which can be included in conditions.
Groundwater Resources	Yes	No	Agree with applicant's assessment that the development would not have any adverse effects on groundwater.
Land Ecology	Yes	No	Agree with applicant's assessment that no adverse ecological effects are anticipated and that no ecological management is required. Note that a Bird Management Plan (BMP) is referenced but not supplied. Not of concern as BMP not required.
Land Resources	Yes	No	Agree that erosion and sediment loss can be appropriately managed. No concerns around effects to highly productive land or groundwater.
Natural Hazards	Yes	No	Applicant has considered everything that would be expected and proposed high-level solution to address flooding hazard. Agree with Stormwater Engineering advice that further flood modelling would be required.
Planning	Yes	No	The application is complete from a policy planning perspective, with appropriate policy assessments included. There is some inconsistency with CRPS Objective 9.2.3 and classification of the site as 'significant habitat' due to the presence of At-Risk species, but this is a minor issue.
Stormwater Engineering	Yes	Yes	High Risk Issue - An assessment of the changes in flood depth and extent as a result of the proposed works, ideally by providing a difference map for review.

			Low Risk Issue - No calculations have been provided to demonstrate that the sizing of the stormwater infrastructure is adequate. However, the proposed conditions are considered sufficient to address this.
Surface Water Ecology & Quality	Yes	No	Agree with applicant's assessment of surface water effects, including that enhancement of water races would improve aquatic and riparian habitat. No concerns around effects on surface water from construction or operational discharges and no areas of outstanding contention.

ATTACHMENT 4 – CRC S30 LETTER OF 29 JUNE 2026

29 June 2026

Hughes Developments Ltd
C/o Mark Brown
Director
Davie Lovell Smith

Kia Ora Mark,



Customer Services
P. 03 353 9007 or 0800 324 636

PO Box 345
Christchurch 8140

P. 03 365 3828
F. 03 365 3194
E. ecinfo@ecan.govt.nz
www.ecan.govt.nz

Section 30(3)(b) of the Fast-track Approvals Act 2024

Thank you for your email dated 17 June 2026 regarding Hughes Developments Limited's Bangor Village proposal.

We acknowledge that the proposal is not listed under Schedule 2 of the Fast-track Approval Act 2024 (FTAA).

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

...advise the authorised person—

(a) of any existing resource consent to which section 124C(1)(c) or 165Z1 of the Resource Management Act 1991 would apply if the approval were to be applied for as a resource consent under that Act; or

(b) that there are no existing resource consents of that kind.

Based on our current understanding of the proposal, Canterbury Regional Council can confirm that there are no existing resource consents as per section 30(3)(b) of the Fast-track Approvals Act.

Canterbury Regional Council notes that the subject site is within the Selwyn-Waimakariri Groundwater Allocation Zone, which is currently over-allocated. The Applicant is not proposing to take groundwater as part of the application. However, if the applicant were to propose the taking of groundwater, there would be existing resource consents to which [section 124C\(1\)\(c\)](#) would apply, unless the proposed groundwater take were for the purpose of a community water supply.

Canterbury Regional Council trust this clarification provides the necessary information for proceeding with the application under the FTAA. Should you require any further information or have additional queries, please do not hesitate to contact us.

Ngā mihi



Dwayne Daly
Principal Consents Planner
