

To: Ministry for the Environment

From: Kerstin Ghisel – Barker & Associates Limited

Date: 18 May 2026

Re: Planning Memorandum for Franco Farms Referral Application

1.0 Introduction

1.1 Franco Farms

Sabys 101 Limited, as the applicant, has engaged Barker & Associates (B&A) to provide planning services for the masterplanning, consenting and design of Franco Farms, which is located on the south-western edge of Christchurch City and comprises a total of approximately 35ha. Franco Farms is an urban development consisting of residential and supporting commercial that will form an extension to the existing residential neighbourhood of Halswell. The proposed indicative scheme plan is attached at **Attachment 1**, which illustrates the proposed layout is well advanced but is however subject to change based upon more detailed investigations.

The key components of the project are:

- The proposal will establish approximately 350 residential lots and associated residential units.
- A neighbourhood centre to provide for the future resident's day to day needs.
- A new reserve and enhanced riparian margin adjacent to Knights Stream, the Halswell River and the Creamery Drain.
- An integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve and stormwater basins with associated wetland areas to the south of the application site.
- Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure.
- Delivered in multiple construction stages but within one substantive application.

Overall, the proposal is consistent with the matters set out in s22 of the Fast-track Approvals Act 2024, as it represents a well-developed and feasible residential development that will deliver significant regional benefits, including the provision of substantial housing supply within a recognised growth area and associated economic and social benefits. The project is supported by detailed technical assessments, which demonstrate that infrastructure servicing, transport access, and geotechnical conditions can be adequately provided for and managed, with no fundamental constraints to development. Potential natural hazard risks, including flooding, liquefaction and lateral spreading, have been identified and can be appropriately

mitigated through established engineering and design responses, while the proposal integrates effectively with the surrounding transport network and existing urban form.

Referring the project to the fast-track approvals process will facilitate the Franco Farms project, including by enabling it to be processed in a more timely and cost effective way than under normal processes and is unlikely to materially affect the efficient operation of the fast-track approvals process.

In this context, the project clearly meets the criteria in s22, as it is of a scale and nature that will deliver significant regional benefits, and referral to the fast-track approvals process would facilitate the timely delivery of the project and is unlikely to materially affect the efficient operation of the approvals process.

2.0 Regional Significance of the Project

The Fast-track Approvals Act 2024 (FTAA) has established a framework that differs from the Resource Management Act 1991. The matters outlined in Sections 22(1)(a) and 22(2)(a) of the FTAA direct the considerations available to the Minister when assessing a project's eligibility for referral.

In summary, Franco Farms is a development project that will create economic benefits and address housing needs in terms of supply, type, and price at a scale that will provide significant regional benefits. The scale of the proposal will enable approximately 350 new homes and directly address the identified housing shortfalls across two territorial jurisdictions within the Canterbury Region. Franco Farms is generally consistent with the relevant strategic outcomes identified in local and regional planning documents.

The project will have the following regional significant benefits:

- The proposed residential development would generate substantial one-time economic benefits over the development period, including employment for more than 240 full-time equivalent workers over four years, approximately \$83 million in wages and salaries, and boosting GDP by \$138 million.
- Direct and indirect employment generated during the construction phase of the project.
- Providing a substantial, direct boost in market supply to help meet demand.
- Provision of additional residential land available for development and sale within a growth area of Christchurch.
- Contributing to the variety of district housing options/typologies to meet diverse needs and preferences.
- Contributing to achieving critical mass to support greater local retail/service provision.
- When assessed over a long-term horizon, the economic value of development materially exceeds the value of potential rural production, even under high-value agricultural scenarios.
- The proposal delivers wider economic benefits including increased housing supply, improved market responsiveness, and support for the functioning of the wider urban economy.
- Proposal supports climate change mitigation by incorporating low-emissions construction practices, enabling energy-efficient urban form, and enhancing carbon sequestration through planting. In doing so, it contributes positively toward reducing net greenhouse gas emissions over both the short and long term.

2.1 Criteria for assessing referral application

We respond to the relevant Section 22(2)(a) considerations for the Franco Farms development below.

Section 22(2)(a)(i) – has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list:

While the Franco Farms project is not explicitly listed as a priority in a central government, local government, or sector plan or strategy, it 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, as set out below.

Section 22(2)(a)(iii) – 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):

The economic report (**Attachment 2**) prepared by Insight Economics confirms the proposal would enable approximately 350 additional dwellings on rural-zoned land, representing a substantial increase in development capacity in the south-west Christchurch growth area. This scale of development is described within the economic assessment as being “a substantial increase in housing supply in south-west Christchurch”. They reach this conclusion because they have identified a material risk of insufficient feasible greenfield capacity over the medium term (10 years) in this location, driven by higher-than-assumed population growth, limited remaining greenfield supply, and heavy reliance on intensification outcomes that do not align with observed demand for standalone dwellings. The assessment notes that only around 7,600 greenfield dwellings remain citywide and that, at recent uptake rates, this supply is likely to be exhausted in the medium term. Against this context, the proposal is assessed within the assessment as making a meaningful contribution to maintaining sufficient development capacity and supporting a more responsive housing market. The proposed yield of approximately 350 dwellings is equivalent to approximately five percent of the total remaining feasible greenfield housing capacity identified for Christchurch over the next 30 years, and around five months of recent citywide greenfield uptake – delivered from a single site, in a market segment (standalone dwellings in greenfield locations) that the Council’s HCA’s intensification-led capacity does not directly serve.

The economic report demonstrates the application site is located within Christchurch’s southern growth area, close to major employment nodes including the Hornby industrial area, which has experienced strong industrial growth. Residential consenting data shows that Halswell has consistently captured a disproportionate share of citywide housing demand over an extended period, indicating sustained demand and strong market confidence in the south-west. The economic analysis concludes that enabling additional residential development at this location aligns with established growth patterns and employment distribution and therefore supports a well-functioning urban environment in terms of NPS-UD Objective 3(a) and 3(c). On that basis, the proposal is considered to meet section 22(2)(a)(iii) of the FTAA.

Section 22(2)(a)(iv) – will deliver significant economic benefits

In addition, the economic report (**Attachment 2**) quantifies the economic impacts of the development, estimating employment for more than 240 full-time equivalent workers over four years, approximately \$83 million in wages, and \$138 million in GDP accruing within Canterbury. When compared to long-term rural production scenarios, residential development generates substantially greater GDP, employment and

wages, even over a 50-year horizon. These findings reinforce that transitioning the land to residential use not only increases housing supply but supports the wider functioning of the urban economy.

Overall, based on the economic report, the proposal will:

- Enable a significant increase in greenfield housing capacity in a high-demand growth area;
- Address emerging risks of insufficient feasible capacity in Christchurch's housing market;
- Align with established employment patterns and residential growth trends; and
- Support the efficient functioning of the wider urban economy.

For these reasons, and as concluded in the economic assessment, the proposal satisfies section 22(2)(a)(iii) by increasing housing supply and contributing to a well-functioning urban environment.

Section 22(2)(a)(vii) – will support climate change mitigation, including the reduction or removal of greenhouse gas emissions:

The proposal will support climate change mitigation and contribute to the reduction of greenhouse gas emissions, consistent with national direction under the Climate Change Response Act 2002 and emissions reduction targets. The project promotes a consolidated urban form by delivering coordinated residential development in a planned and serviced location that immediately adjoins the urban boundary, rather than enabling dispersed rural or ad hoc development. Concentrating growth in proximity to existing urban areas, employment, education, and community facilities reduces vehicle kilometres travelled and supports lower transport-related emissions over the long term.

The development will integrate active transport connections, pedestrian and cycle infrastructure, and linkages to existing and planned public transport networks. This will support modal shift and reduce reliance on private vehicles. The presence of waterbodies adjacent to the application site provides an opportunity to establish off-road shared pathways within landscaped riparian margins. These connections will create a safe and attractive environment for pedestrians and cyclists, separated from vehicle traffic, thereby further encouraging active transport and contributing to reduced transport-related greenhouse gas emissions. The application site is situated within the Halswell area of Christchurch City, which is serviced by an expanding Christchurch cycle network of dedicated cycleways and shared paths. CCC's Major Cycle Routes and local cycle links provide connections between suburbs, town centres, schools and recreational areas, with over 75km of cycleways now operational and planned extensions underway. The development's proposed active transport infrastructure (including safe off-road shared paths adjacent to waterbodies) will provide direct and attractive links to the existing and planned cycle network, enhancing connectivity and supporting modal shift toward active transport.

At a building and infrastructure level, the proposal can incorporate energy-efficient design and infrastructure in accordance with current Building Code requirements, with the opportunity to integrate renewable energy solutions and low-emissions technologies at the detailed design stage. The coordinated provision of three-waters and infrastructure services also enables more efficient and lower-emission servicing compared to dispersed development patterns.

In addition, the proposed landscaping, ecological restoration and riparian enhancement planting will contribute to carbon sequestration over time, while also enhancing biodiversity and increasing climate resilience through improved shading, stormwater management, and habitat connectivity. The proposal will also assist in minimising greenhouse gas emissions through both construction practices and masterplan design. During construction, emissions will be reduced through measures including:

- Minimising truck movements associated with earthworks by retaining and reusing excavated material on site where practicable; and
- Adopting a staged construction approach to enable efficient programming of works and reduce unnecessary vehicle trips and plant use.

At the masterplan level, the layout and orientation of blocks and lots have been designed to promote energy efficiency. Lot orientation and street layout will optimise opportunities for passive solar gain, natural light penetration, and energy-efficient building design. This will support reduced operational energy demand for future dwellings and contribute to lower long-term emissions.

Overall, the proposal supports climate change mitigation by incorporating low-emissions construction practices, enabling energy-efficient urban form, and enhancing carbon sequestration through planting. In doing so, it contributes positively toward reducing net greenhouse gas emissions over both the short and long term.

Section 22(2)(a)(x) – is consistent with local or regional planning documents, including spatial strategies:

Overall, Franco Farms is consistent with the relevant local and regional planning documents, as set out in Section 6.0.

The proposal can be assessed as broadly consistent with the higher-order strategic outcomes promoted through local and regional planning frameworks that seek to enable consolidated, well-serviced urban growth and to avoid ad hoc or dispersed rural residential development. In particular, the proposal is intended to be delivered as an integrated, comprehensively designed development with coordinated infrastructure, rather than as sporadic rural lifestyle subdivision. This approach aligns with the direction of the Canterbury Regional Policy Statement, which promotes consolidated urban form, the efficient provision of infrastructure, and integrated land use and transport outcomes across the Greater Christchurch area.

In terms of spatial planning, the Greater Christchurch growth framework and spatial strategies seek to enable growth in a planned manner that is coordinated with infrastructure investment and transport networks. While the sites are not currently zoned for urban development, the proposal can be framed as supporting the strategic intent of accommodating growth through a planned extension of the existing urban environment (where connections to the surrounding settlement pattern and servicing networks can be achieved), thereby contributing to housing supply and improved affordability outcomes and supporting a more compact urban form.

The proposal also aligns with local and regional direction to improve climate outcomes by promoting walkable neighbourhood design, providing active transport connections (including potential off-road shared paths where integrated with riparian margins), and enabling energy-efficient urban design through block structure and lot orientation that supports passive solar gain and reduced operational energy demand. These measures support mode shift, reduce transport-related emissions, and contribute to longer-term climate mitigation outcomes.

Overall, while the proposal is not consistent with the operative rural zoning provisions within the district plans, it can be characterised as consistent with the strategic intent of relevant higher-order planning documents and spatial strategies that seek to achieve coordinated, compact, low-emissions growth supported by efficient infrastructure delivery, subject to addressing key constraints (including infrastructure capacity, servicing, and any applicable highly productive land or freshwater/ecology considerations) through

detailed design and the consenting process. A further assessment of the relevant local and regional planning documents is detailed at Section 6.0.

2.2 Benefit of the Fast-Track Approvals Act (2024) for Sabys Estate

As outlined in Section 22(1)(b)(i) and (ii), part of the determination for accepting a referral application includes outlining whether the FTAA (2024) process would facilitate a more efficient and timely delivery of the project.

(b) referring the project to the fast-track approvals process—

i. would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and

ii. is unlikely to materially affect the efficient operation of the fast-track approvals process.

The fast-track process will enable the project to be processed in a more timely and cost-efficient manner than under the normal process, for the following reasons:

- Under the FTAA, expert panels will consider required approvals as a single, integrated application package, as opposed to the standard process where multiple applications would be required across different authorities. This is particularly important for this project, which straddles the Christchurch City Council (CCC) and Selwyn District Council (SDC) boundaries, as the fast-track process enables a coordinated approach to approvals and the development of consistent and aligned conditions across both jurisdictions, significantly improving implementation efficiency;
- Under the FTAA, public and limited notification is precluded, expert panels are only permitted to invite comments from specified persons who have a short timeframe to provide comment. Given the scale of this development, it would likely be a fully notified application under the Resource Management Act 1991 which would significantly slow down the consenting process and add to cost, taking into account the appeal rights enabled under the standard RMA process;
- Under the FTAA, timeframes are shorter and stricter than that of the normal process resulting in significantly less time for obtaining resource consent and efficiencies for the project; and
- There is resourcing in place to process the application efficiently and certainty around timeframes for the applicant to ensure the project remains 'shovel ready'.

As outlined in Section 0, Franco Farms requires a range of resource consents (land use, subdivision, discharge, dewatering) from CCC, SDC, the Canterbury Regional Council (CRC), and potentially approvals under the Wildlife Act 1953, an archaeological approval under the Heritage New Zealand Pouhere Taonga Act 2014 and approvals relating to complex freshwater fisheries activities. The ability to apply for a comprehensive range of consenting requirements within one application, to be considered by one panel, offers significant efficiencies in planning and specialist inputs, especially when the site is positioned over two council jurisdictions and would otherwise require approvals from four separate consenting authorities. It also supports strategically integrated decision-making.

3.0 s13(4) – A description of the project - Proposal and Effects

3.1 Site Description

The application site is located on the south-western edge of Christchurch City with a site area of approximately 35ha. The application site comprises of two land parcels which are irregularly shaped and located between Sabys Road to the north and Halswell Road to the south (Figure 1). One of the land parcels is located within Christchurch City (Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573) and the second is within Selwyn District (6 Wrooths Road).

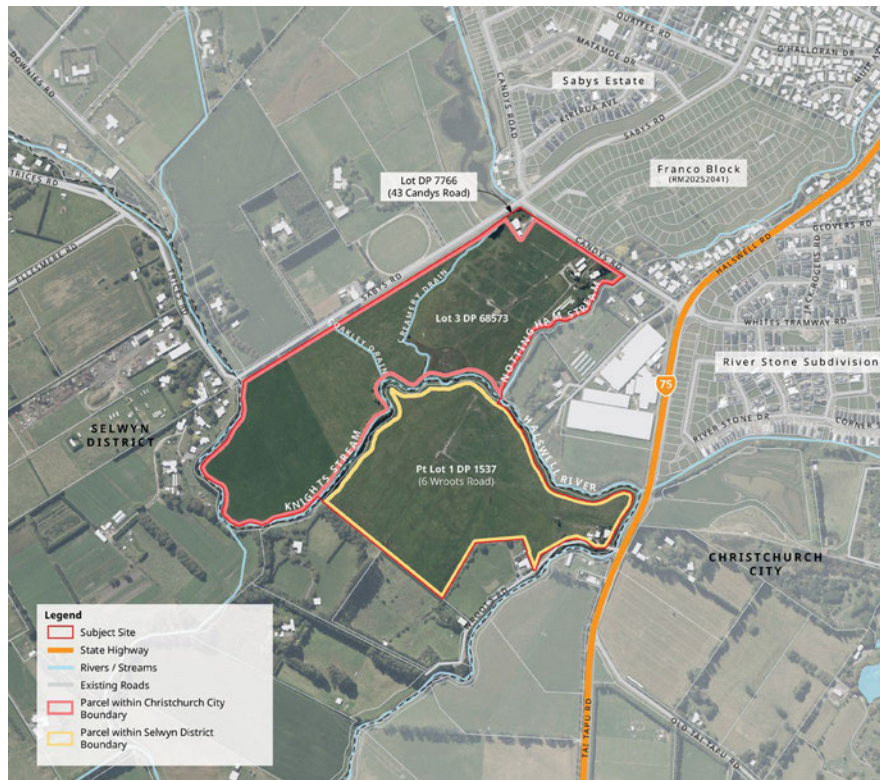


Figure 1: Site Location

The site is bounded by Sabys Road to the northwest, with established residential allotments on the northern side of Sabys Road. Nottingham Stream and part of the Halswell River border the site's eastern boundary. The surrounding environment comprises a mix of rural, rural-residential and established residential development, reflecting the transitional urban edge character of Halswell.

The site is currently used for rural purposes, including pastoral farming, hay production and horse grazing, with areas of farmyard activity, outbuildings and a residential dwelling present. Historically, the land has supported a range of agricultural and horticultural activities.

Topographically, the site is generally flat with gently undulating ground levels. A gradual fall occurs across the land, with parts of the site falling toward the southwest near the Sabys and Candys Road intersection, and southern areas falling toward the Creamery Drain and Halswell River. The overall gradient is low, reflecting typical alluvial plains topography.

The site contains a network of surface water features. Nottingham Stream forms part of the eastern boundary and discharges into the Halswell River, which runs west to east and separates portions of the site.

The Creamery Drain bisects the northern block south of Candys Road, conveying flows from upstream stormwater infrastructure to the Halswell River. Additional drainage features, including the Coakley Drain, traverse the site, although some are ephemeral or proposed to be modified as part of future development.

Overall, the site comprises a largely open rural landscape influenced by surrounding waterways and drainage features, with a pattern of existing farm infrastructure and adjacent urban development that reflects its location on the edge of the Christchurch urban area.



Figure 2: The application site

The site lies over the Coastal Confined Gravel Aquifer System within Canterbury Maps. There are a number of onsite wells within the application site however only one of them is active (M36/1991).

Well reference	Status	Use	Depth
M36/1991	Active	Dairy Use/Domestic Supply	97.20m
M36/1830	Not Used		
M36/3856	Not Used		
M36/2005	Not Used		
M36/0823	Casing Retrieved / Abandoned	Geotechnical / Geological Investigation	16.10m

3.2 Records of Title and Interests

Table 1: Application site's legal descriptions

Address	Appellation	Record of Title	Landowner Name	Area	Council
	Lot 2-3 Deposited Plan 58573 Lot 2-3 Deposited Plan 68573	CB40A/430	Franco Farms Limited	20.7812 ha	Christchurch City Council
6 Wroots Road, Kennedys Bush	Part Lot 1 Deposited Plan 1537	CB32B/668	Franco Farms Limited	14.2948 ha	Selwyn District Council

This application is being made by the Applicant who owns all the land subject to this referral application.

The Records of Title for the site are subject to a number of interests (refer **Attachment 3**), as detailed below. Overall, there are no interests which will prevent the proposed works from being undertaken. Several consent notices and easements are registered on titles within the development area; however, these will be varied separately following fast-track approval. This two-step approach is not uncommon in resource consent processes under the RMA, in which other authorisations are obtained following the issue the resource consent. This is the most efficient way to progress the development and will not materially affect the implementation of the proposed development.

Table 2: Existing title interests

Interest	Comment
CB40A/430	
A273736.4 Esplanade Strip Instrument pursuant to Section 232 Resource Management Act 1991 - 12.12.1996 at 9.02 am (affects Lot 3 DP 68573)	There is a requirement to provide a 12m wide esplanade strip adjacent to Knights Stream and the Halswell River which being proposed.
181033.1 Easement Certificate – to drain water	
Subject to Section 241 Resource Management Act 1991)	This relates to Lots 2-3 Deposited Plan 58573 being held in the same Record of Title. The amalgamation of the lots will be addressed as part of the future subdivision application.
Subject to Section 8 Coal Mines Amendment Act 1950 (affects part formerly in CT CB539/73	Not considered to affect the proposal.
CB32B/668 – 6 Wroots Road	
No interests on the title	

3.3 Surrounding Area

The surrounding environment includes a mix of residential land to the east, rural lifestyle blocks to the north and farmland to the southwest. This pattern reflects the transition between traditional agricultural land use and rural–residential development. Moffats Flower Company is located approximately 90m to the east/south-east of the application site. The Hohepa residential campus is located to the west on the western side of Knights Stream.

3.4 The Franco Farms Proposal and Activities Proposed

The proposal is an urban development consisting of residential activities and supporting commercial that will form an extension to the existing residential neighbourhood of Halswell. The proposed indicative high-level scheme plan is attached at **Attachment 1** within the urban design graphic pack, which illustrates the proposed layout is well advanced but is however subject to change based upon more detailed investigations.

The key components of the project are:

- The proposal will establish approximately 350 residential lots and associated residential units.
- A neighbourhood centre to provide for the future resident’s day to day needs located adjacent to Sabys Road.
- A new reserve and enhanced riparian margin adjacent to Knights Stream, the Halswell River and the Creamery Drain.
- An integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve and stormwater basins with associated wetland areas to the south of the application site.
- Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure.
- Delivered in multiple construction stages but within one substantive application.

3.4.1 Transport

The proposed roading and access arrangements are outlined in the Abley transport assessment (**Attachment 4**). In summary, the proposal includes the following indicative key elements which will be subject to further detailed design during the preparation of a substantive application:

- Primary access to the site will be provided via two connections to Sabys Road and one connection to Candys Road, enabling integration with the wider transport network while maintaining the function of Halswell Road (SH75).
- The internal roading network will comprise a hierarchy of local roads designed to create a safe, low-speed environment and provide legible connections throughout the neighbourhood.
- The layout integrates with the recently approved subdivision at 101 Sabys Road (which is also owned by the applicant) and allows for coordinated development and future connections where feasible.

- Walking and cycling connections will be incorporated within the street network and through green linkages, including connections toward Halswell Road and the wider active transport network.
- Overall, the roading layout provides a well-connected and integrated transport network consistent with the surrounding growth area.

3.4.2 Three waters

A high level infrastructure report has been prepared by DLS and is attached at **Attachment 5**. Below is a summary of the proposed servicing for the application site.

Water Supply

The development will be serviced by the CCC water supply, including the land within Selwyn District. The indicative design shows water connecting to existing 250mm PE mains within both Sabys and Candys Roads, with new 250mm or 180mm PE mains (subject to modelling) extending through the application site. Submains will be installed within berms to service individual lots. Upgrades to the wider network, including along Kennedys Bush Road, Glovers Road, and the Wilmers Pump Station, are anticipated and will be confirmed through detailed design and agreement with Council. Peak demand for approximately 350 lots is estimated at 52.5l/s, with infrastructure sized to meet council standards. Firefighting supply will achieve FW2 classification, with hydrants spaced to meet required flow and coverage. Detailed modelling will be undertaken at the substantive stage.

Sewer

The development will be serviced by the CCC sewer network, including the land within Selwyn District. A Local Pressure Sewer (LPS) system is proposed in the indicative design, consistent with nearby developments. This approach is preferred due to shallow groundwater, ground conditions, seismic resilience, and flexibility in network layout and flow management. It would involve upgrades to existing pump stations and pipelines between the site and Pump Station 105 on Wigram Road, ensuring sufficient network capacity.

The LPS network will include pressure mains within road reserves, with each lot serviced by an individual pump unit and tank. A viable wastewater servicing solution has been identified and can be supported through detailed engineering design. Final design details, including pipe sizing, discharge location, and any required network upgrades, will be confirmed through detailed modelling and ongoing consultation with council and will be provided as part of the substantive application.

Stormwater

The application site is located within a Christchurch District Plan (CDP) Flood Management Area (FMA), with flood depths of up to 1m in low-lying areas close to existing waterways. Finished floor levels are expected to require land raising in discrete locations and this will be subject to detailed engineering design as part of the Substantive Application. The lot layout otherwise retains and integrates existing waterways within the proposed open space network.

Indicative design for stormwater servicing. This new facility is proposed to be relocated south of the Halswell River (within Selwyn District) to maximise development yield. Further discussions with CCC and SDC will occur as part of the Substantive Application on the optimum stormwater network design.

Indicative design for stormwater treatment will include first flush basins (25mm runoff) discharging to wetlands, with detention sized for the 2% AEP (1 in 50-year) 60-hour event. The network will be designed to convey a 20% AEP event, with secondary overland flow paths directed via roads to the stormwater facilities.

Detailed flood modelling and final design will be completed as part of the Substantive Application, with all infrastructure constructed in accordance with council standards.

3.4.3 Earthworks

The development will require bulk earthworks (including cut and fill) to form roads, service corridors and finished lot/building platform levels. Earthworks design and staging will have regard to flood hazard and geotechnical constraints, with appropriate erosion and sediment controls implemented during construction. Detailed earthworks methodology and quantities will be confirmed at the substantive application stage.

3.4.4 Power, Telecommunications and Street Lights

Power and telecommunications services will be provided to all lots in accordance with utility provider and industry standards. Consultation with service providers will be undertaken to confirm capacity and any required network upgrades. All services will be installed underground, with kiosks located on separate lots. Existing connections will be integrated into the overall design. Street lighting will be installed in accordance with Council standards, with final fixture selection subject to Council approval as part of the substantive application.

3.4.5 Staging

The project will be applied for as a single substantive application but will be delivered in multiple construction stages.

3.4.6 Ineligible Activities and Prohibited activities

The project does not involve any ineligible activities, and it does not involve any activities that are prohibited activities under the Resource Management Act 1991

3.5 Christchurch District Plan

The parcel of land legally described as Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573 is zoned Rural Urban Fringe (Figure 3). The portion zoned Residential New Neighbourhood is not included within this referral application. The Rural Urban Fringe Zone covers the flat land adjacent to metropolitan Christchurch and provides for rural productive activities and the use of existing sites between 1ha and 4ha for rural residential units, while avoiding the creation of new sites of less than 4ha for rural residential units.

There is also a small area along the southern portion of the site within the margins of both Nottingham Stream, Knights Stream and the Halswell River which is zoned Open Space Water and Margins. The purpose of the Open Space Water and Margins Zone is to manage the uses on the surface of water and within the margins of rivers, lakes, and wetlands so that the natural qualities and habitats of water bodies and their margins are protected while providing for public access, where appropriate, and for recreation activities.

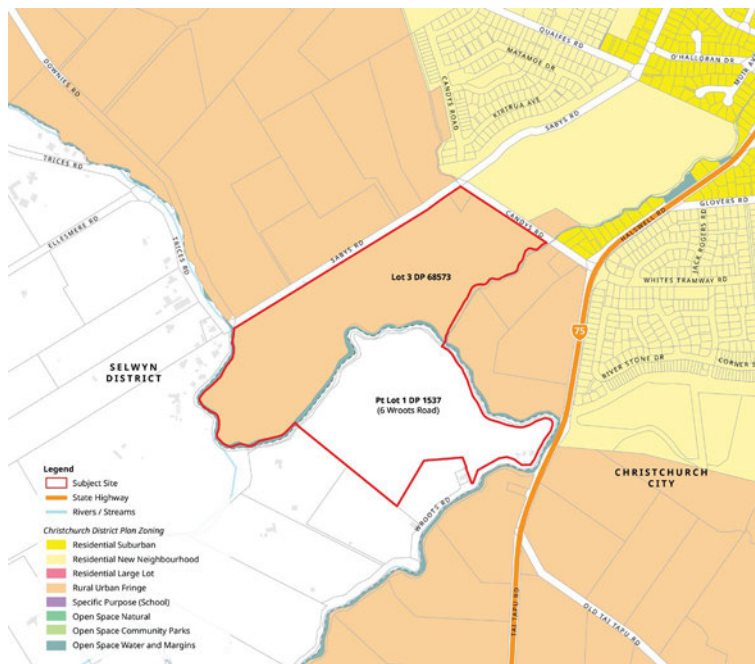


Figure 3: Zoning of application site within the Christchurch District Plan

Roading overlays

Sabys Road (adjacent to the application site) and Candys Road are identified as a Minor Arterials and Halswell Road is classified as a major arterial within the CDP's roading hierarchy.

Waterbodies

Nottingham Stream and Knights Stream traverse along the site's western and southern boundary (Figure 4). They are both identified as an upstream waterway adjacent to the site's boundary and an ecological site within Appendix 9.1.6.1 Schedule B). Upstream waterbodies are subject to a 10m building setback. The characteristics of an upstream waterway include:

- The upper to middle reaches of rivers and major streams with wide floodplains. The upper reaches may be intermittently dry, but the middle reaches have continuous flow.
- High ecological values including significant riparian planting; or part of a catchment with high ecological values and capable of enhancement or restoration.

- High amenity values and landscape values providing a sense of openness and spaciousness; and, in some instances, recreational opportunities.
- Potential cultural values and associations and opportunities for mahinga kai or customary use.

Nottingham Stream and Knights Stream both feed into the Halswell River, which bounds the eastern boundary of 6 Wroots Road. The Halswell River is classified as a downstream waterway, and the characteristics of this type of waterway are:

- Downstream sections of large rivers with wide beds, continuous flow, extensive floodplains and, in many cases, tidal reaches.
- Significant ecological values; or part of a catchment with significant ecological values and capable of enhancement or restoration.
- Contribute significantly to the character and amenity values of the surrounding area and the district for the benefit of both the general public and private property owners. This contribution could include: landscape values; sense of openness and spaciousness; and recreational opportunities.
- In many cases, significant cultural values and associations and either existing or the potential for mahinga kai and customary use.

Coakley Drain and Creamery Drain both traverse through the application site and are classified as a network waterways¹.



Figure 4: Waterways at the application site (Source: CDP).

The CDP specifies the following esplanade strips in regard to Knights Stream and the Halswell River which have been reflected in the indicative site masterplan:

¹ This was confirmed via email from Cindy Asmat, Surface Water Planning Engineer, CCC.

Table 3: Esplanade requirements

Waterbody	Reserve or strip	Location	Width (m)
Knights Stream	strip	True left bank, commencing at the south side of Quaifes Road, thence downstream to the south side of Sabys Road	12
Knights Stream	strip	True left bank, commencing at the south side of Quaifes Road, thence downstream to the south side of Sabys Road	12
Halswell River	strip	True left bank, commencing at the south side of Sabys Road, thence downstream to the boundary with SDC at the south corner of Lot 1 DP 23528, in Old Tai Tapu Road	20

Ecological Site

Knights Stream, Nottingham Stream and the Creamery Drain are identified within the planning maps as an Ecological Site within Appendix 9.1.6.1 Schedule B of the CDP (Figure 5), which are areas that have been identified and assessed as being ecologically significant. These sites are priorities for the CCC to complete the collaborative process with landowners.



Figure 5: Ecological site (Appendix 9.1.6.1 Schedule B)

Natural Hazard Overlays

The site is subject to the following natural hazard overlays:

- Flood hazard overlay: flood management area, with very minor sections of the site being within the high flood hazard management area, which is further shown on the Canterbury Maps flood model results (Figure 7).
- Liquefaction management area (whole site).

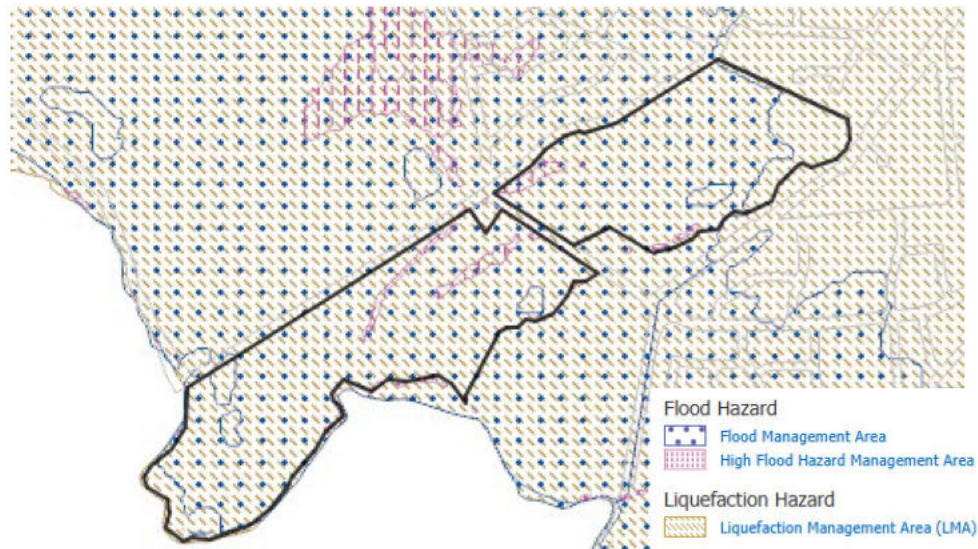


Figure 6: CDP Natural Hazard Overlays



Figure 7: Canterbury Maps flood model results

3.6 Surrounding Zoning

The site is located on the outskirts of the Christchurch City urban area, with residential development located to the east and Rural Urban Fringe zoned land to the north, south and west. The land to the east, on the eastern side of Sabys Road is zoned Residential New Neighbourhood within the CDP. This zone generally includes new areas of greenfield land where large-scale residential development is planned to occur and provides for a wide range of residential house types and section sizes and is to be developed in accordance with an Outline Development Plan, to ensure a more integrated and sustainable development is achieved.

Sites of Ecological Significance

There are identified two Sites of Ecological Significance within the CDP near to (but outside of) the application site. The first is LP29 which is located to the east and LP38 which is positioned to the north and known as the Creamery Ponds and are part of the Low Plains ecological district.

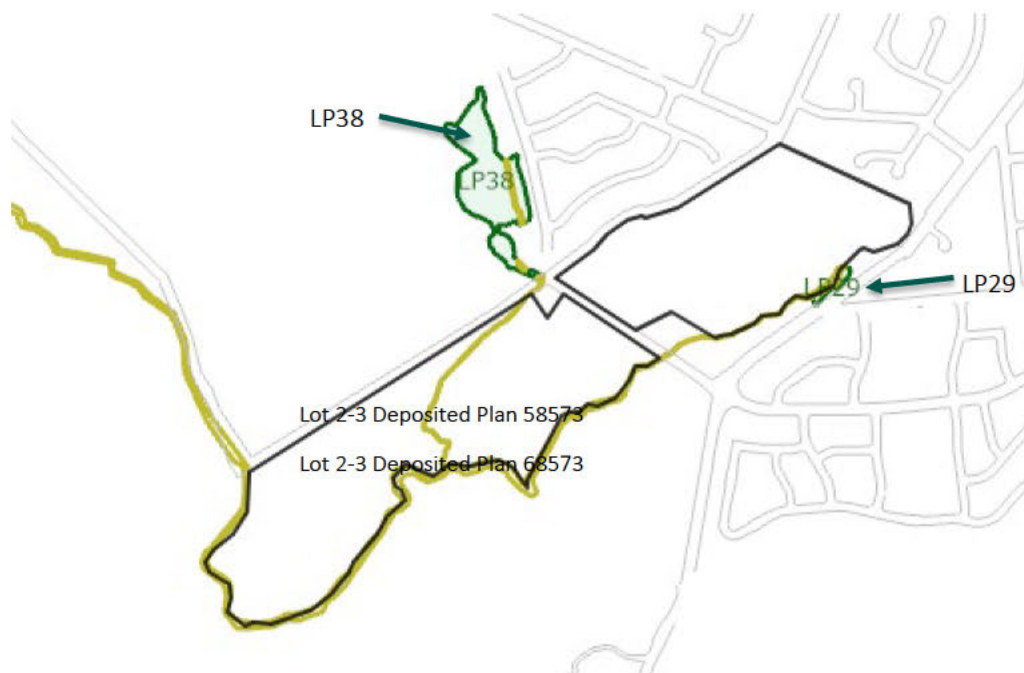


Figure 8: Natural and cultural heritage overlay within the CDP

3.7 Partial Operative Selwyn District Plan (Appeals Version) – Zoning and Overlays

The site at 6 Wroots Road is located within the General Rural Zone of the Partial Operative Selwyn District Plan (Appeals Version) (POSDP) (Figure 9), with the zone’s primary purpose being to provide for primary production activities and other compatible activities. The site at 6 Wroots Road is subject to the POSDP’s Residential Density-Specific Control Area SCA-RD1 which limits residential density to one residential unit per 4ha.

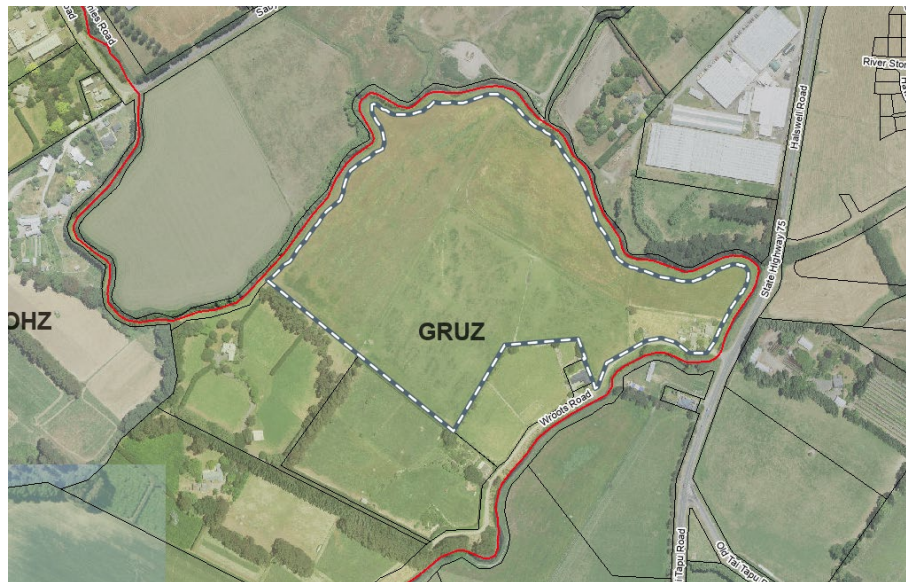


Figure 9: Zoning under POSDP

Cultural Values

Knights Stream and the Halswell River are located within a Sites and Areas of Significance to Māori (SASM) Ngā Wai Overlay (SASM37) within SASM-SCHED3 Ngā Wai. Refer to Section 8.0 for details of consultation undertaken with iwi.

Natural Hazards Overlay

The site is subject to the ‘Plains Flood Management Overlay’ but it is not located in the Liquefaction Damage Unlikely Overlay.

Roading Classification

Wroots Road is classified as a local road under the POSDP roading hierarchy.

3.8 Relevant Background

3.8.1 Christchurch City Council Consents

The following consents have been granted by CCC for the land at (neighbouring) 101 Sabys and Lot 2-3 DP 58573 and Lot 2-3 DP 68573 which is also owned by the Applicant.

RMA/2025/2041 – on neighbouring land

Subdivision and land use consent was granted by CCC in December 2025 to enable a 206 lot residential fee simple subdivision, with three local purpose access lots to vest in CCC (Lots 301 – 303), Lot 305 to vest as esplanade reserve, two local purpose utility reserves to vest in CCC (Lots 300 and 304), and new internal roads to vest in CCC (Lots 500-505) and associated earthworks and stormwater management. The site that is subject to RMA/2025/2041 is identified in Figure 9 below as “Application Site”. The neighbouring development will be undertaken over six stages. Consent was also granted for associated earthworks and stormwater management, with the latter including a large pond system located at the north of the ‘balance land’ on the plan below (Figure 10).



Figure 10: RMA/2025/2041

4.0 Reasons for Consent

At this FTAA referral stage, we have identified that the proposal would potentially trigger resource consent under the Wildlife Act 1953, Heritage New Zealand Pouhere Taonga Act 2014, Freshwater Fisheries Regulations 1983, Christchurch District Plan, Partially Operative Selwyn District Plan (POSDP); the Canterbury Land and Water Regional Plan, Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NESC) and NES:F for the reasons listed below. This list is not exhaustive and is based upon the information available to date. Further consent triggers may be identified as the proposal develops.

4.1 Christchurch District Plan

These potential reasons for consent apply to Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573.

Chapter 5 Natural Hazards

Activities and earthworks in the Flood Management Area

- If the new buildings are not permitted by the activity status rules and/or activity specific standards for P1-P9 set out in Rule 5.4.1.1 then consent is required for a **Restricted Discretionary Activity** under Rule 5.4.1.5 RD1.
- If the proposed earthworks cannot comply with P13 then resource consent for a **Restricted Discretionary Activity** is required under Rule 5.4.1.5 RD2.

Activities in the High Flood Hazard Management Area

- The proposal will be classified as a **Non-complying Activity** under Rules 5.4.6.3 NC1, NC2 and NC4 as the proposal is a change in use (rural activities to residential activities) and it will involve creating vacant lots and enabling future residential units to be built within the area identified as being within a High Flood Hazard Management Area as shown on the planning maps.

Liquefaction hazard

- The proposal would require consent under Rule 5.5.2 C1 for a **Controlled Activity** as it involves a subdivision which creates additional vacant allotments in the LMA.

Chapter 6 General Rules and Procedures

Activities near infrastructure

Consent may be required under the following rules; however, it is anticipated that future residential units can be designed to comply with the relevant acoustic standards:

- The proposed residential units listed in Rule 6.1.7.2.1 (Sensitive activities near roads and railways) that exceeds any noise limits in the activity standards for those activities by 10 dB or less would require resource consent for a **Restricted Discretionary Activity** under Rule 6.1.7.1.3 RD1.

- The proposed residential units listed in Rule 6.1.7.2.1 (Sensitive activities near roads and railways) that exceeds any noise limits in the activity standards for that activity by more than 10 dB would require resource consent for a **Non-Complying Activity** under Rule 6.1.7.1.5 NC4.

Waterbody Setbacks

- Earthworks may require resource consent as a **Restricted Discretionary Activity** under Rule 6.6.4.3 RD1 within the setback of the waterbodies.
- New buildings, other structures or impervious surfaces may require resource consent as a **Restricted Discretionary Activity** under Rule 6.6.4.3 RD2 within the setback of the waterbodies.
- Any proposed water body bank maintenance or enhancement works that do not meet one or more of the activity specific standards would require resource consent as a **Restricted Discretionary Activity** under Rule 6.6.4.3 RD4.

Chapter 7 Transport

- Any activity that does not meet any one or more of the standards in Rule 7.4.3 'Standards - Transport (All zones outside the Specific Purpose (Lyttelton Port) Zone)' would require resource consent as a **Restricted Discretionary Activity** under Rule 7.4.2.3 RD1.

Chapter 8 Subdivision, Development Earthworks

Subdivision

- The proposal will involve a subdivision to create allotments for access, utilities, roads and reserves and is classified as a **Controlled Activity** at Rule 8.5.1.2 C4.
- The application site is located within the Flood Management Area but it cannot comply with Rule 8.5.1.3 RD4 as it is subject Rule 8.5.1.4 D1 and Rule 8.5.1.5 NC4. The proposal would be classified as a **Non-Complying Activity** under Rule 8.5.1.5 NC4.
- Subdivision in a rural zone resulting in allotments that does not meet the minimum net site area of 4ha is classified as a **Discretionary Activity** under Rule 8.5.1.4 D1.
- The proposal will involve creating lots less than 4ha in area and is therefore a **Non-Complying Activity** under Rule 8.5.1.5 NC4 and results in a non-compliance with Activity Standard Rule 8.6.1 'Minimum net site area and dimension'.

Earthworks

- The proposed earthworks will exceed the permitted volume and depth and therefore resource consent will be required under Rule 8.9.2.3 RD1 as a **Restricted Discretionary Activity**.
- If there are any earthworks within the Sites of Ecological Significance overlay listed in Schedule A of Appendix 9.1.6.1 will require resource consent for a **Discretionary Activity** under Rule 8.9.2.4 D1.

Chapter 17 Rural

- If any activity does not meet one or more of the built form standards, then resource consent for a **Restricted Discretionary Activity** is required under Rule 17.5.1.3RD1.

- If any conservation activities are proposed which do not meet one or more of the activity specific standards then resource consent is required for a **Restricted Discretionary Activity** under Rule 17.5.1.3RD2.
- If any recreational activities comprising of buildings and/or impervious surfaces that have in combination equal to or exceeding 100m² but less than 500m² then resource consent is required for a **Restricted Discretionary Activity** under Rule 17.5.1.3RD8.
- If any new community facilities are proposed, then resource consent is required for a **Restricted Discretionary Activity** under Rule 17.5.1.3RD9.
- If any recreation activities proposed and the area of buildings and/or impervious surfaces in combination is equal to or exceeds 500m² then resource consent for a **Discretionary Activity** is required under Rule 17.5.1.4D5.
- Rule 17.5.1.5 NC1 is a catch all rule as it outlines that any activity not provided for as a permitted, controlled, restricted discretionary, discretionary or prohibited activity is classified as **Non-Complying Activity**. Consent may be required under this rule.
- Consent will be required under Rule 17.5.1.5 NC3 for any residential activity and/or minor residential unit that does not meet the activity specific standards in Rule 17.5.1.1 P5 as a **Non-complying Activity**.

Chapter 18 Open Space

- Any activity listed in Rules 18.8.1.1 P4, P8, P9, P10, P13 and P20 which requires the construction of a new building, except as specified in Rules 18.8.1.3 RD8. If any buildings are proposed within this zone (i.e. a bridge of the waterbody) then resource consent may be required for a **Discretionary Activity** under Rule 18.8.1.4 D2.
- Any activity not provided for as a permitted, controlled, restricted discretionary, or discretionary activity is classified as a **Non-Complying Activity** under Rule 18.8.1.5 NC1.

4.2 Partially Operative Selwyn District Plan (Appeals Version)

These potential reasons for consent apply to 6 Wroots Road.

Transport

- The activity will require consent as a **restricted discretionary activity** under Rule TRAN-R8 for high trip generating activities.
- Consent would likely be required for works or activities that are related to land transport infrastructure that are not carried out in an existing land transport corridor under Rule TRAN-R3. The activity status is determined based on the specific rule requirement/s that are not complied with.
- The establishment of vehicle crossings would likely require consent as a **Restricted Discretionary Activity** under Rule TRAN-R4.
- The establishment of vehicle accessways would likely require consent, the activity status is determined based on the specific rule requirement/s that are not complied with.
- Parking, manoeuvring and loading areas would likely require consent, the activity status is determined based on the specific rule requirement/s that are not complied with.

- Rural vehicle movements and associated parking would likely require consent as a **Restricted Discretionary Activity** under Rule TRAN-R7.
- Any activity that does not meet any one or more of the standards listed as TRAN-S1 – S28 will require consent as a **Restricted Discretionary** or a **Discretionary Activity** under the specific standard that is not complied with.

Subdivision

- Subdivision in the General Rural Zone that does not meet the density requirements specified in GRUZ-SCHED2 requires consent as a **Non-Complying Activity** under Rule SUB-R11.5.
- Subdivision that does not comply with the subdivision access standards listed in SUB-REQ6.1 require consent as a **Controlled Activity** under Rule SUB-R13.
- Subdivision of a site that adjoins a surface water body requires consent as a **Restricted Discretionary Activity** under Rule SUB-R22.
- The site adjoins the Halswell River, requiring a 20m esplanade reserve which requires consent under Rule SUB-R24 for subdivision and public access as a **Restricted Discretionary Activity**.
- Subdivision that does not provide a 15m x 15m building square requires consent as a **Non-Complying Activity** under Rule SUB-REQ2.
- Subdivision that does not provide corner splays that comply with the requirements of SUB-REQ8 require consent as a **Restricted Discretionary Activity**.

Natural Hazards

- Earthworks that exacerbate flooding on neighbouring sites require consent as a **Restricted Discretionary Activity** under Rule NH-REQ4.

General District Wide Matters

Earthworks

- Earthworks for subdivision where the area of land subject to the works exceeds 1,000m² require consent as a **Restricted Discretionary Activity** under Rule EW-R5A.
- Earthworks that do not comply with the relevant earthwork rule requirements listed under EW-REQ1 – REQ5 require consent as a **Restricted Discretionary Activity** under the specific rule requirements that is not complied with. Consent would also be required under EW-R2 in relation to any non-compliance.

Ecosystem and Indigenous Biodiversity

- If indigenous vegetation clearance is proposed, consent will be required as a **Restricted Discretionary Activity** under Rule ECO-RC.

General Rural Zone

- Buildings and structures that do not comply with the relevant rule requirements require consent as a **Restricted Discretionary Activity** under the specific rule requirement that is not complied with.
- If the minimum density is not achieved for residential units on undersized sites, consent would be required as a **Non-Complying Activity** under Rule GRUZ-R5.

4.3 Canterbury Land and Water Regional Plan

General Rules

- Consent could be required under Rule 5.6 for a **Discretionary Activity** depending on the proposed construction methodology regarding the waterbodies within and adjoining the application site.
- Water permit (s14): For the non-consumptive take of water from Knights Stream/Halswell River and discharge of that water back into the watercourse.
- Discharge permit (s15): For the discharge of construction phase stormwater and operational phase stormwater if the project cannot operate under CCC's global consents.

Sewerage Systems

- The use of land for a community wastewater treatment system and the discharge of sewage sludge, bio-solids and treated sewage effluent from a community wastewater treatment system and the discharge of sewage sludge and bio-solids from an on-site wastewater treatment system into or onto land, or into or onto land in circumstances where a contaminant may enter water are **discretionary activities** under Rule 5.84.
- The discharge of treated sewage effluent into surface water or a wetland is a noncomplying activity under Rule 5.86.

Reticulated Stormwater Systems

- Rule 5.93 relates to the discharge of stormwater onto or into land or into or onto land in circumstances where a contaminant may enter water, or into groundwater or a surface waterbody, as a restricted discretionary activity. The operational phase stormwater may require resource consent for a **Restricted Discretionary Activity** under Rule 5.93 if written permission cannot be provided from CCC to use their reticulated system.

Construction Phase Stormwater Discharge not discharged from a Reticulated Stormwater System

- Rule 5.94A relates to the discharge of construction-phase stormwater, other than into or from a reticulated stormwater system onto or into land in circumstances where a contaminant may enter groundwater. The proposal is unlikely to comply with Condition 1 of Rule 5.94A as while earthworks will be staged there is potential for the discharge to occur from more than one stage and therefore the area could exceed 2ha in area. Consequently, the proposal could require consent under Rule 5.94B and be classified as a **Restricted Discretionary Activity**.

Stormwater not discharged from a Reticulated Stormwater System

- If the proposed discharge of stormwater is not from a reticulated stormwater system then consent is likely required under Rule 5.97 as a **Non-Complying Activity** as the site is from, into or onto contaminated or potentially contaminated land and therefore does not comply with the conditions associated with Rules 5.95 and 5.96.

Discharge of contaminants into surface water

- Rule 5.99 relates to the discharge of water or contaminants into surface water or onto or into land in circumstances where it may enter surface water that is not classified by any of the previous rules. If

the proposal cannot comply with the conditions associated with this permitted activity rule, then consent need to be sought under Rule 5.100 for a **Discretionary Activity**.

Small and Community Water Takes

- Rule 5.113 relates to the taking and using of less than 5L/s and 10m³ per property per day of groundwater as a permitted activity, provided the bore is located more than 20m from the property boundary, or any surface waterbody. The proposal may involve the taking water from existing onsite wells to fill the water carts which will be used to manage onsite dust as a result of the proposed earthworks. Onsite wells are currently located over 20m from the site's boundaries and any surface waterbody. The proposal is a **Permitted Activity** under Rule 5.113.

Site Dewatering

- Rule 5.119 relates to the taking of water from groundwater for the purpose of dewatering for carrying out excavation, construction, maintenance and geotechnical testing and the associated use and discharge of that water is a permitted activity, provided a proposal can comply with the conditions. The proposal may require consent as a **Restricted Discretionary Activity** under Rule 5.120 if it cannot comply with all the conditions associated with Rule 5.119.

Dams and Damming

- Rule 5.154 provides for the damming of water in the bed of a river and the constructing, using, altering, maintaining and operating of dam structures within the bed of a river, including any damming or impounding of water outside the bed of a river or natural lake as a permitted activity. If the proposal cannot comply with the conditions associated with Rule 5.154 then it is classified as a **Non-Complying Activity** under Rule 5.156.

Earthworks over an Aquifer

- Rule 5.175 relates to the use of land to excavate material. The proposal is unlikely to comply with the conditions associated with the permitted activity because there is likely to be less than 1m between undisturbed material and groundwater and the proposed excavations will be occurring within 50m of a surface waterbody. The proposed earthworks would then be classified as a **Restricted Discretionary Activity** under Rule 5.176.

Take and Use Surface Water

- Rule 5.126 is for the non-consumptive taking and use of water from a river or artificial watercourse and discharge of the same water to the same lake, river or artificial watercourse and is classified as a **Restricted Discretionary Activity**, provided the relevant conditions are met. This rule would apply if the proposal involves the over-pumping from any river or artificial watercourse for the duration of the works.

Structures

- The placement, installation, erection, reconstruction, alteration or removal of any structure, excluding dams, on, in or under the bed of a river, and including any associated excavation, disturbance, diversion and discharge in the bed of a lake or river, or any diversion or discharge in an artificial watercourse, that does not comply with Rules 5.135 to 5.141 is a **Discretionary Activity** under Rule 5.141A. Consent may be required depending on the proposed construction methodology.

Wetlands

- Rule 5.159 relates to the creation of a wetland, including the associated taking, use, damming or diversion of water from groundwater or surface water, and discharge of excess or overflow water from the wetland into surface water and is provided as a Permitted Activity. If the creation of a wetland does not comply with one or more of the conditions in Rule 5.159 then it is classified as a **Discretionary Activity** under Rule 5.160.

Vegetation in Lake and Riverbeds

- Consent may be required under Rule 5.169 for a **Restricted Discretionary Activity** if the proposed vegetation clearance and earthworks within the riparian margins does not comply with one or more of the conditions in Rules 5.167 or 5.168.

4.4 Canterbury Air Regional Plan (CARP)

- Rule 7.32 relates to the discharge of dust to air beyond the boundary of the property of origin from the construction of buildings, land development activities, unsealed surfaces or unconsolidated land, as a permitted activity provided the relevant conditions are met. The proposal is likely to be able to comply with all the conditions and be classified as a **Permitted Activity** under Rule 7.32.

4.5 National Environmental Standards

4.5.1 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('NES:CS') sets a nationally consistent set of planning controls and soil contaminant values. A Preliminary Site Investigation (PSI) has been undertaken by Momentum Environmental Limited (**Attachment 6**) which concludes that several areas have been identified at risk of soil contamination within the application site (Figure 11), including:

- Farmyard and pottery workshop risk area: Potential heavy metal, OCP, petroleum hydrocarbon and/or asbestos contamination around old sheds and buildings, a potential former sheep dip, storage and burn areas.
- Waste disposal to land risk area: Potential heavy metals, petroleum hydrocarbon and/or asbestos contamination from storage and burning of waste.
- Residential risk area: Potential heavy metal, petroleum hydrocarbons and/or asbestos contamination around old building, storage of items and a potential burn area.
- Historic building risk areas: Potential heavy metal contamination at the location of former buildings.



Figure 11: Risk area plan (Source: Momentum Environmental Limited)

The PSI notes that these are confirmed or likely HAIL activities and there may be a risk to human health from contaminated soils in these areas and recommends that a Detailed Site Investigation (DSI) be undertaken across all risk areas prior to development of the site. This DSI is currently underway, and it will confirm the specific resource consents required under Regulations 9-11 of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NESC). The effects of any proposal for earthworks, change in use of land and subdivision will be assessed as part of a substantive application if successfully referred.

The PSI states that the remainder of the site has been used for general pastoral use. This use is unlikely to have caused soil contamination that would pose a risk to human health or the environment. There is no evidence of an activity or industry described in the HAIL occurring on the pastoral parts of the site now or in the past and no further investigations are required.

In conclusion, a DSI is currently being progressed and will form part of the documentation required under the substantive application to determine the exact extent and locations of any contamination. The PSI confirms that the presence of any contaminated land associated with HAIL activities within the site can be appropriately managed to accommodate urban development, including through a Remediation Action Plan (RAP) and Site Management Plan (SMP).

Resource consent will be required under Regulation 10 of the NES-CS as a **Restricted Discretionary Activity**. On this basis, any requirements of the NES-CS can be addressed as part of an application post-referral and potential risks to human health can be appropriately managed and mitigated.

4.5.2 National Environmental Standard for Freshwater

The Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES:F) sets standards to regulate activities that pose risks to the health of freshwater bodies and freshwater ecosystems, including rivers, streams and natural inland wetlands.

An Ecological Constraints Assessment (**Attachment 7**) has been prepared for the site by Bioresearches and confirms that multiple waterways are present within the site, including the Nottingham Stream, Knights Stream, the upper reaches of the Halswell River, Creamery Drain, Coakley Drain, and two artificial drains within the southern block (i.e. 6 Wroots Road) (Figure 12).

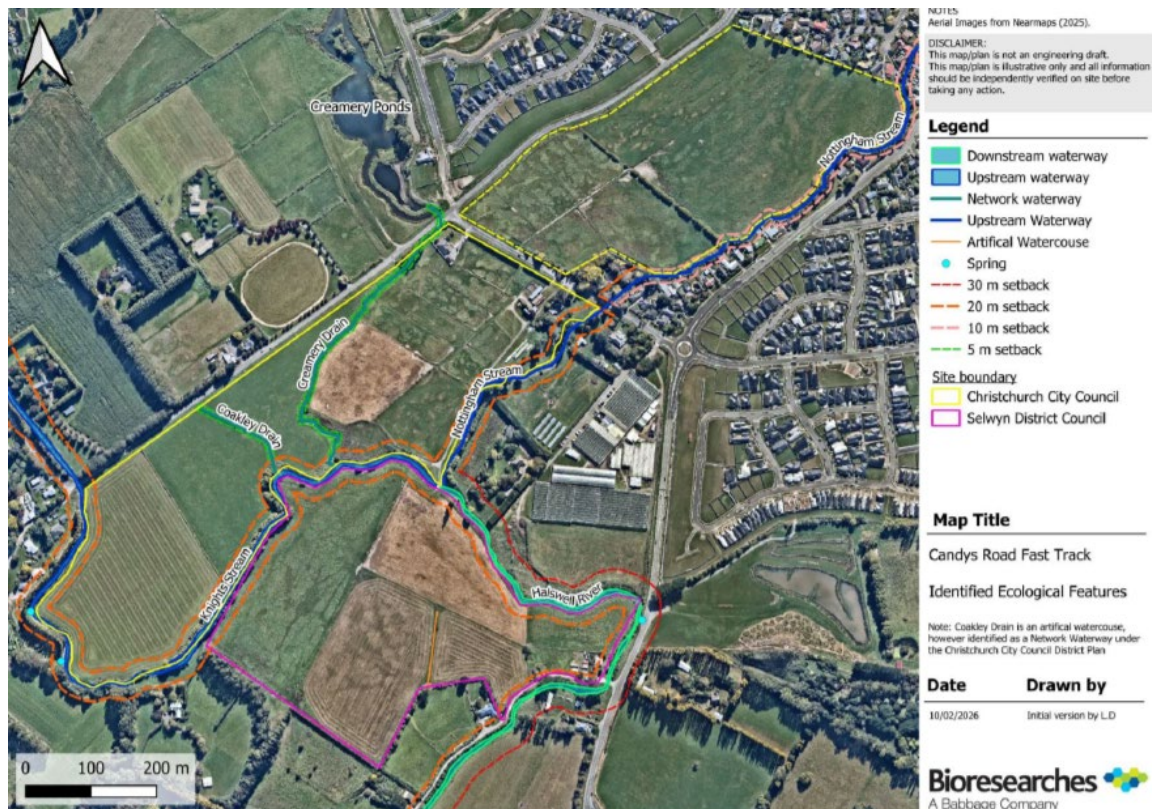


Figure 12: Existing ecological features identified within the application site (Source: Bioresearches)

Importantly, the assessment concludes that no natural inland wetlands are present within the application site. Vegetation within the artificial drain at 6 Wroots Road comprises pasture grasses and macrophytes established within a purposefully constructed waterbody and is not considered to meet the definition of a natural inland wetland. Accordingly, the NES:F provisions relating specifically to natural inland wetlands are unlikely to be triggered by the current draft scheme layout, subject to confirmation at detailed design.

However, works within and adjacent to rivers and streams will be subject to the NES:F. Activities such as stream crossings, culverts, stormwater outfalls, diversion of water, discharge of sediment-laden construction stormwater, and any temporary dewatering have the potential to affect fish passage, water quality and aquatic habitat. These activities are likely to require resource consent under the NES:F and/or regional plan, with activity status to be confirmed through detailed design. Structures that may obstruct fish passage, works in the bed of rivers, and discharges to water are expected to require consent (likely as **Restricted Discretionary or Discretionary Activities**, depending on final design and compliance with standards).

Detailed design will confirm the extent of in-stream works, culverting, realignments (if any), stormwater discharges and associated earthworks, and determine the relevant consent triggers under the NES:F (including Subpart 2 – Activities in the beds of rivers and Subpart 3 – Reclamation and drainage, where applicable). The substantive application will assess effects on aquatic ecology, including fish passage, sedimentation, dewatering effects and habitat disturbance, and will incorporate appropriate avoidance, minimisation and mitigation measures.

4.6 Other Approvals

4.6.1 Wildlife Act 1953

The project may need approval under the Wildlife Act 1953 due to the potential presence of lizards and bats, however this is subject to further ecological assessments which will be prepared as part of the substantive application.

4.6.2 Heritage New Zealand Pouhere Taonga Act 2014

Approval may also be required under the Heritage New Zealand Pouhere Taonga Act 2014 and this will be confirmed as part of the substantive application. The applicant has engaged an archaeologist, and this reporting will form part of the substantive application.

4.6.3 Freshwater Fisheries Regulations 1983

Approval may also be required under the Freshwater Fisheries Regulations 1983 in regard to the construction of any dam or culvert in Knights Stream depending on the proposed construction methodology.

5.0 Description of Effects and significance of those Effects

Section 13(4)(h) requires a description of anticipated and known adverse effects on the environment, and the significance of those effects.

The proposal is not expected to generate any significant adverse environmental effects. Any adverse effects on the environment will be appropriately avoided, remedied or mitigated to be minor or less than minor in nature. The key potential adverse effects are described below, along with a statement about the significance of those effects and should be reviewed in conjunction with the supporting technical expert memorandums accompanying this application.

5.1 Positive Effects

The proposal will deliver positive effects including:

- Significant regional housing benefits through the delivery of a large number of residential lots within the south-west Christchurch growth area, contributing to housing supply and supporting affordability.
- Economic benefits at both local and regional levels, including employment generation during construction, increased demand for goods and services, and enabling further investment in the southwest Christchurch growth area.
- Efficient and integrated infrastructure delivery, including coordinated provision of transport, water, wastewater, stormwater, and utilities infrastructure, improving overall network performance and resilience.

- Improved transport connectivity and accessibility, including new roading connections and walking and cycling infrastructure that integrate with the existing network and support multi-modal transport outcomes.
- Environmental enhancements, particularly through integrated stormwater management, water quality treatment, and riparian setbacks and planting, which will provide improved outcomes relative to the existing rural land use.
- Creation of a cohesive, master-planned community, including provision of open space, green links, and amenity values that support community wellbeing and liveability.
- Improved resilience to natural hazards, with identified risks such as flooding and geotechnical constraints able to be appropriately managed through design and engineering measures.
- Contribute to a well-functioning urban environment.

5.2 Transportation

Abley has prepared a high-level transportation assessment (**Attachment 4**), appended to the referral application, which considers how the proposed development at the site can integrate with the surrounding transport network and the extent to which the transport effects of the proposal can be appropriately managed.

Vehicle Access Assessment

The proposal will be served by three vehicular access connections to the surrounding road network, comprising two new road connections to Sabys Road and one new connection to Candys Road aligned with Road 1 of the recently consented 101 Sabys Road subdivision. Abley notes that these access points can achieve appropriate sight distance and provide a suitable means of access for the scale of development proposed. No direct roading connection to Halswell Road (SH75) is proposed, which is appropriate given the function of that route and the physical constraints associated with the Halswell River and surrounding road environment.

The proposed internal road network is expected to connect coherently with the adjoining approved subdivision at 101 Sabys Road and to provide for a safe and legible movement network within the site. New roads will generally function as local roads in a low-speed environment, with the potential for traffic calming and 30 km/h operating environments on selected links where walking and cycling are encouraged. Internal intersections are anticipated to be predominantly priority-controlled, with pedestrian crossing opportunities incorporated as part of the detailed design.

Walk / Cycle Assessment

The site can integrate well with the surrounding active transport network. Existing walking and cycling facilities are already available in the wider area, including routes along Halswell Road and within the adjoining residential neighbourhoods. The proposal will provide walking and cycling facilities along the Sabys Road and Candys Road frontages, consistent with the upgrades already approved as part of the neighbouring 101 Sabys Road subdivision. Abley also identifies the need for an additional walking and cycling linkage across the Halswell River to improve connectivity between the proposed neighbourhood and the wider network, including access toward Halswell Road and surrounding urban areas.

Within the site, the proposed road network is intended to support active modes through a low-speed street environment and connected pedestrian facilities. Overall, the proposal will improve local connectivity for walking and cycling and will integrate with both existing and future transport links in the area.

Public Transport

While the high-level transport assessment is focused primarily on the site's roading, access and active transport arrangements, the proposed urban form and street layout can support future public transport accessibility as the surrounding area develops. Provision can be made through the detailed design process to ensure the street network can accommodate public transport if required in future. This is consistent with the broader objective of establishing an integrated transport network for the site.

Traffic Generation and Wider Network Effects

At this stage, Abley's assessment indicates that the proposal can be accommodated by the surrounding transport network, subject to more detailed assessment at the substantive stage. The surrounding network already includes planned and consented upgrades associated with the 101 Sabys Road development, including a roundabout at the Sabys Road/Candys Road intersection and the urbanisation of the site frontages. Abley concludes that, in principle, the transport elements of the proposal are supportable and that the internal layout is capable of complying with the relevant transport outcomes anticipated by the Christchurch and Selwyn planning framework.

A more detailed Integrated Transport Assessment (ITA) will be prepared at the substantive application stage to confirm traffic generation, intersection performance, walking and cycling connectivity, and any mitigation measures or upgrades that may be required.

Based upon the preliminary transportation assessment by Abley, transport effects are not considered to be significant and can be appropriately assessed and mitigated through detailed design and any required upgrades as part of the substantive fast-track approvals process.

5.3 Geotechnical Effects

A Geotechnical Engineering Investigation has been undertaken by KGA Geotechnical (**Attachment 8**). The report includes an assessment of the application site against the requirements of Section 106 as illustrated in the following table.

Table 4: Assessment of the application site against the RMA requirements

Hazard	Potential Susceptibility	
	Current	Post Development
Erosion	No evidence of erosion across site.	Provided stormwater is discharged in a controlled manner and appropriate engineering design is implemented, erosion is unlikely to worsen due to development or have significant adverse effects on the development.
Falling Debris	The site is flat and located away from any hills, with no risk of falling debris.	--

Hazard	Potential Susceptibility	
	Current	Post Development
Slippage / lateral movement	The site at 20m away from the stream presents minor potential for global horizontal movement and lateral stretch. A 20m no build zone is recommended adjacent to the Nottingham Stream and Halswell River.	The development will not have any effect that could worsen the existing potential for horizontal movement on site provided no free faces are created on the site or within close proximity of the site. If at any point the 20m no build zone adjacent to Nottingham Stream/Halswell River is to be developed, further lateral spreading assessment will be required
Subsidence	Potential liquefaction hazard, cyclic softening, and static settlement is present on site.	Significant damage is unlikely to occur to the proposed development provided dwelling specific investigations are undertaken and building foundations are appropriately designed following site-specific testing recommendations.
Inundation	The site is within a flood management area as per the CDP.	Provided stormwater discharge is appropriately managed, any CCC/SDC finished floor level requirements are respected and/or advise is sought from an experienced civil engineer, we consider that the risk of inundation will not be exacerbated by developing the land and may be appropriately managed.

Based on the geotechnical investigations undertaken to date, the application site is underlain by interbedded silts, sandy silts and silty sands overlying intermediate gravels and/or gravels, with soils within the upper 15m expected to vary across the site. Groundwater was encountered at depths ranging from approximately 0.6m to 2.5m during onsite investigations. Evidence of liquefaction ejecta was observed across the site following the February 2011 earthquake event, and there is potential for ongoing static settlement due to the presence of softer soils. However, based on experience with nearby sites with similar ground conditions, the geotechnical report notes that any settlement is not anticipated to adversely affect the proposed subdivision or future land development. Appropriate foundation and ground improvement solutions to manage settlement will be confirmed following additional site testing and once detailed development design is available.

There is also potential for lateral spreading in the vicinity of Nottingham Stream and the Halswell River. The geotechnical report recommends a 20m no-build setback which is consistent with the identified 20m reserve shown on the proposed scheme plan. Site-specific shallow geotechnical investigations will be required to confirm foundation design for the development of each new lot. The design of foundation systems will be

undertaken in accordance with the recommendations and guidance provided within the NZGS/MBIE *Earthquake Geotechnical Engineering Practice Module 4*. This information will be provided as part of the substantive application.

Based on the preliminary geotechnical assessment by KGA Geotechnical, anticipated adverse effects relate to natural hazards are not considered to be significant, as they can be appropriately managed through standard engineering design and mitigation measures, with no constraints identified that would preclude development.

5.4 Construction Effects

Contaminated Land

As outlined in the PSI (**Attachment 6**) there are some potential sources of onsite contamination which are subject to further investigations. A detailed site investigation (DSI) is currently being prepared to support the substantive application should this referral application be accepted. It is considered that any contamination can be mitigated through remediation prior to earthworks commencing on site through the implementation of a SMP.

Earthworks (including erosion and sediment)

Earthworks associated with enabling building platforms, roads and servicing infrastructure have the potential to generate sediment-laden runoff and adverse effects on receiving environments if not appropriately managed. Earthworks will be undertaken in accordance with best-practice erosion and sediment control measures, including staging, stabilisation and treatment devices, with an Erosion and Sediment Control Plan (ESCP) prepared for the works. Where practicable, bulk earthworks will be timed for the drier months to reduce the risk of sediment discharge to waterways. Topsoil will be stripped, stockpiled, and reinstated following bulk earthworks, with disturbed areas re-grassed in accordance with Council standards. The ecological constraints assessment identifies sedimentation from construction stormwater and dewatering discharges as a key potential effects pathway, and confirms these effects are not expected to be significant where appropriate design and mitigation measures are implemented.

A balanced cut and fill approach will be adopted, with excavation required for stormwater infrastructure, roads, and service trenches. Fill will be used to raise building platforms where necessary to achieve flood protection and finished floor level requirements. Earthworks will account for site geotechnical conditions, including shallow groundwater and variable soils, and may include ground improvement where required. Erosion and sediment control measures will be implemented in accordance with Environment Canterbury guidelines. All fill will be placed and compacted to NZS 4431:2022 standards and tested by an independent laboratory. Overall, earthworks will follow best practice to minimise environmental effects and support residential development.

Dust

During construction, it is anticipated that there will be dust generated by the earthworks and land disturbance, which can be mitigated and managed via an ESCP.

Construction Noise and Vibration

During construction, noise and vibration is anticipated to occur as a result of the works proposed to be carried out on the site. Construction will be managed in accordance with the NZS 6803:1999 Acoustics – Construction Noise and German Standard DIN 4150-3:1999 Structural vibration – Effects of vibration on

structures. Construction noise and vibration will be managed in accordance with the ESCP which will outline measures, such as restrictions on hours of operation and use of quieter machinery (among others) to ensure that potential construction noise effects of the project are appropriately managed.

Construction Traffic

Construction of the proposed development will generate temporary traffic associated with earthworks, infrastructure installation, and building activities. Construction vehicles will access the site via Sabys Road and Candys Road, which connect to the wider transport network including Halswell Road and Halswell Junction Road.

The surrounding road network is of sufficient scale and function (minor arterial routes) to accommodate construction traffic associated with the development. While there are some existing safety considerations in the wider area, these are being addressed through planned network upgrades.

Construction traffic effects will be temporary and can be appropriately managed through the implementation of a Construction Traffic Management Plan (CTMP). This would include measures such as designated access routes, management of truck movements, and timing of works to minimise disruption. Overall, any adverse effects associated with construction traffic are expected to be minor and manageable.

Construction Stormwater / Dewatering

Construction dewatering and diversion of clean water around work areas can create water quality effects if unmanaged. The ecological assessment identifies dewatering discharge and associated sedimentation risk as potential effects pathways but confirms they are not expected to be significant with appropriate mitigation and management measures. These measures will be addressed through the ESCP and construction water management procedures.

Summary

In summary, any potential adverse effects relating to the construction phase is not considered to be significant and can be appropriately managed.

5.5 Infrastructure and Servicing

Details of the proposed infrastructure services such as stormwater, wastewater, water supply and utilities are outlined above and further detailed within the Infrastructure Report from DLS (**Attachment 5**).

Water Supply:

The site can be serviced via connections to the existing Christchurch reticulated water supply network, with capacity available to service the proposed development subject to detailed design and any required localised upgrades. Water supply is not considered a constraint to development.

Wastewater:

Wastewater servicing for the development is proposed via a Local Pressure Sewer (LPS) system, consistent with nearby developments and the previously consented portion of the site. This approach is preferred due to shallow groundwater conditions, underlying soil constraints, and improved resilience to settlement and seismic effects. The LPS network will involve individual on-lot pump systems discharging to a reticulated pressure network within the road corridors.

While an existing connection point is available in Sabys Road for part of the development, the downstream Christchurch wastewater network is currently capacity constrained and cannot accommodate the full development without further intervention. Accordingly, several servicing options have been identified within the infrastructure report, including upgrading the downstream network in coordination with Council, constructing a new on-site pump station and rising main to an alternative discharge location, or (as a less preferred option) implementing a private on-site treatment system.

Ongoing engagement with CCC and integration with wider network modelling will be required to confirm the final servicing solution. Notwithstanding this, it is considered that a feasible wastewater servicing solution can be achieved, and the site can be appropriately serviced from a wastewater perspective.

Stormwater and Flooding:

Stormwater will be managed through an integrated on-site system incorporating detention, treatment and controlled discharge to the Halswell River. Overland flow paths will be retained, and flood risks managed through a design-led approach, including finished floor levels and stormwater infrastructure consistent with Council requirements. Stormwater is not considered a constraint to development.

Power and Telecommunications

Power and telecommunications services will be provided in accordance with utility provider requirements, with services undergrounded and infrastructure located within road corridors or designated lots. These services can be extended to the site and are not expected to constrain development.

5.6 Noise

Operational noise effects are expected to be typical of a residential environment and generally compatible with the receiving environment at the urban edge. Construction noise will be appropriately managed through the ESCP.

5.7 Cultural Effects

The site includes and adjoins waterways within the Halswell River / Knights Stream catchment, which are recognised as having cultural significance to Ngāi Tahu, particularly in relation to mahinga kai, whakapapa connections, and the health and mauri of freshwater systems. Development therefore has the potential to affect cultural values associated with water quality, ecological health, and the relationship of mana whenua with these environments.

Engagement undertaken to date with Mahaanui Kurataiao Ltd and Whitiora Centre Limited, alongside consultation with the Department of Conservation, has helped inform the identification of key cultural and environmental considerations relevant to the site. This engagement has emphasised the importance of protecting and enhancing the mauri of waterways, maintaining natural character, and recognising the interconnected nature of land, water and ecological systems.

Potential cultural effects, including those on freshwater values, can be appropriately managed and, in some respects, enhanced through the proposed development. This will be achieved through the incorporation of measures such as riparian setbacks and planting, restoration and enhancement of stream margins, and integrated stormwater management systems designed to improve water quality prior to discharge. The proposed 20m setback and reserve areas along the Halswell River and Nottingham Stream provide an opportunity to protect sensitive margins and support ecological and cultural outcomes.

In addition, the design of open space and landscape areas provides an opportunity to incorporate culturally responsive design elements, including the expression of mana whenua values, narratives and identity within the development. Ongoing engagement with mana whenua is proposed through the detailed design and substantive phase to ensure that these outcomes are appropriately developed and implemented.

Overall, subject to continued engagement and the incorporation of the above measures, the proposal is considered capable of recognising and providing for cultural values associated with the site. The effects relating to cultural are not expected to be significant and can be addressed through detailed design as part of the substantive phase.

5.8 Landscape and Visual Effects

The site is located at the urban–rural interface within the southwest area of Christchurch and is currently characterised by modified pastoral land with limited landscape or visual amenity values. The surrounding environment includes established and consented residential development, and as such the site is visually influenced by its proximity to the existing urban edge. The proposal will result in a transition from rural to urban character; however, this change is consistent with the anticipated pattern of growth in this location. The masterplanned layout incorporates open space corridors, riparian setbacks and landscape planting, which will assist in integrating the development into the surrounding environment and soften visual effects. In particular, the retention and enhancement of riparian margins along Nottingham Stream and the Halswell River will provide a strong landscape framework and contribute to visual amenity. Effects on the wider landscape are expected to be low given the site’s contained nature and absence of prominent natural features. Visual effects on adjoining properties will be typical of urban edge development and can be appropriately mitigated through setbacks, boundary treatments and planting. Further detail regarding landscape and visual effects will be provided at the substantive stage, including a detailed Landscape and Visual Assessment to inform final design, planting and interface treatments. Notwithstanding this, any landscape and visual effects are not expected to be significant.

5.9 Character and Amenity Effects

A high-level assessment of the urban design aspects of the proposal has been prepared by Barker & Associates (**Attachment 9**).

The site is currently characterised by rural land uses at the edge of the southwest Christchurch urban area, within a transitional environment comprising recently consented and developing residential subdivisions to the north and northeast, alongside rural and rural-residential properties to the south, east and west. The proposal will introduce a residential neighbourhood in place of the existing rural environment, resulting in a change in character. However, this transition is consistent with the anticipated pattern of urban growth in the Halswell and southwest Christchurch area, where adjoining land has already undergone, or is planned for, residential urbanisation.

The proposal has been developed through a masterplanned approach informed by the site’s natural features, surrounding context and anticipated urban function. The urban structure is organised around a clear movement hierarchy, including a primary internal road supported by a network of secondary streets and pedestrian connections, which will promote legibility, permeability and connectivity throughout the neighbourhood. The layout incorporates largely interconnected loop roads, minimising the use of cul-de-sacs and supporting convenient movement for pedestrians, cyclists and vehicles.

The proposal also responds appropriately to the site's waterways and riparian corridors, which assist in structuring the development and providing separation and transition to adjoining rural environments. Open space corridors, riparian margins and stormwater management areas will provide visual amenity, recreational opportunities and ecological integration, while also contributing to the overall identity and character of the neighbourhood. The inclusion of a neighbourhood centre and accessible public open space within the development will further support the establishment of a cohesive and functional residential environment.

In terms of residential amenity, the proposal is expected to provide positive outcomes for future residents through access to open space, pedestrian and cycle connections, integrated landscape features, and a variety of residential lot sizes capable of accommodating a range of household types. The orientation of lots toward the street network and public spaces will support passive surveillance and contribute to an active and attractive streetscape environment.

For adjoining properties, amenity effects such as increased activity, changes in outlook and urbanisation of the surrounding environment are typical of urban edge development and are not unexpected in the context of the surrounding growth pattern. These effects can be appropriately managed through detailed subdivision design measures, including setbacks, landscaping, interface treatments, riparian corridors and the use of open space to provide separation where required.

Overall, the proposal is anticipated to establish a cohesive and well-connected residential environment with a level of character and amenity consistent with contemporary suburban development at the urban edge of Christchurch. Subject to detailed design at the substantive stage, any character and amenity effects are not expected to be significant.

5.10 Ecological Effects

The ecological constraints assessment confirms the site contains multiple waterways (including two artificial waterways within the southern block), and no natural inland wetlands were identified within the site. The assessment identifies potential aquatic effects during development as including fish passage obstruction where culverts/access crossings are required, and sedimentation and dewatering discharge effects during earthworks; however, it concludes these effects are not expected to be significant and can be effectively managed through design, minimisation and mitigation measures. Terrestrial ecological values are described as generally low due to predominately exotic vegetation, though riparian margins and rank pasture may provide habitat for indigenous fauna (including herpetofauna and bats), and effects from vegetation clearance and earthworks can be managed through appropriate mitigation measures.

The report anticipates that native lizards are the most likely protected fauna to be present and notes that a Wildlife Act Authority may be required for salvage and relocation if needed. On this basis, ecological effects can be appropriately managed through setbacks, construction controls, fish-passable design where relevant, and species management procedures.

5.11 Effects on Greenhouse Gas Emissions

The proposal supports emissions reduction outcomes by enabling housing in a location contiguous with existing urban development (reducing the need for dispersed rural residential patterns), and by enabling walking and cycling connections through the site. During construction, emissions can be minimised through efficient staging, reduced rehandling of materials where practicable, and good construction management practices. Over time, riparian and landscape planting will contribute to local climate resilience and modest carbon sequestration benefits.

5.12 Mitigation

Mitigation measures will be embedded through detailed design and, where appropriate, conditions of consent. Key mitigation tools will include a DSI (and remediation/validation as required) to address contaminated land risks under the NESCS; an ESCP to manage earthworks, dewatering management plan; a traffic management plan to manage construction traffic; riparian setbacks and open space corridors to protect waterways and maintain ecological function; fish-passable design for any required culverts/crossings; and ecological management measures (including lizard survey/salvage procedures and Wildlife Act approvals where required). Collectively, these measures ensure adverse effects are appropriately avoided, remedied or mitigated and that residual effects are minor or less than minor.

6.0 Statutory Planning Framework

This section is provided in accordance with Clause 2(1)(a)(i) – (iii) of Schedule 5 of the FTAA. This requires that applications include an assessment of the activity against:

- (a) any relevant national policy statements; and
- (b) any relevant national environmental standards; and
- (c) If relevant, the New Zealand Coastal Policy Statement.

6.1 National Policy Statements

6.1.1 National Policy Statement for Natural Hazards 2025

The NPS-NH applies to flooding, landslip, coastal erosion, coastal inundation, active faults, liquefaction, and tsunami natural hazards. The NPS-NH seeks to manage natural hazard risk associated with subdivision, use and development to people and property using a risk-based proportionate approach, with the risk level being assessed using the NPS-NH risk matrix.

The site comprises approximately 35ha of relatively flat land in southwest Halswell. A preliminary geotechnical investigation has been completed by KGA Geotechnical (**Attachment 8**), along with an Infrastructure Report which has been prepared by DLS (**Attachment 5**). These reports form part of the technical basis for this assessment.

Flooding

Several waterways are present within or adjacent to the site including Knights Stream, Nottingham Stream and the upper reaches of the Halswell River, which ultimately discharge toward Te Waihora / Lake Ellesmere. These waterways are spring-fed plains streams and form part of the wider Halswell catchment. The

ecological assessment identifies the streams as perennial waterways with defined riparian margins and existing flow paths that will be retained through the development layout.

The site is traversed by, and located in proximity to, several waterways including Nottingham Stream and the Halswell River, which form part of the wider Halswell catchment draining toward Te Waihora / Lake Ellesmere. These waterways are spring-fed plains streams with established flow paths and riparian margins. Available flood mapping indicates that the site is subject to inundation, with flood depths of up to approximately 1m anticipated within lower-lying areas. The proposed master-planned development responds to this constraint by incorporating:

- Riparian setbacks and esplanade / reserve corridors along waterways;
- Retention of existing overland flow paths and flood conveyance routes;
- Stormwater management infrastructure, including detention and treatment systems; and
- Potential use of engineered fill to achieve appropriate finished floor levels where required.

These measures will ensure that flood storage and conveyance capacity are maintained and that post-development runoff is appropriately managed. Accordingly, flood risk can be effectively mitigated and will not be exacerbated by the development, consistent with the NPS-NH direction to avoid increasing hazard risk and to integrate hazard management into land use design.

Lateral Spreading

The site is underlain by Holocene alluvial soils typical of the Canterbury Plains, comprising interbedded silts, sands and gravels with relatively shallow groundwater levels. The geotechnical investigation concludes that:

- The site is generally classified as Class D soils;
- Liquefaction-induced settlement is expected to be minor at SLS levels and moderate at ULS levels;
- Majority of the site is expected to behave as TC2 or TC2/TC3 ground conditions; and
- Standard engineered foundation solutions will be appropriate for residential development.

These conditions are typical of the Christchurch area and are well understood within engineering practice. Liquefaction risk can be appropriately managed through subdivision earthworks, ground improvement (where required), and site-specific foundation design at building consent stage.

Under the NPS-NH risk matrix, liquefaction risk is not intolerable and can be mitigated through established engineering measures.

Landslips and Rockfall

The project site is located within the flat Canterbury Plains landscape and consists predominantly of pastoral land with very limited topographic relief. No steep slopes or rock outcrops are present within the site or its immediate surroundings. Given the flat nature of the landform, the risk of landslips or rockfall affecting the site is negligible.

Coastal Hazards and Active Faults

The site is located inland within the Halswell area and is not subject to coastal erosion, coastal inundation or tsunami hazards. Similarly, no active faults are known to traverse the site or its immediate vicinity based on current geological information. These hazards are therefore not considered relevant to the development.

Infrastructure Resilience and Hazard Management

The proposal integrates hazard management into the subdivision design through:

- Retention of waterways and riparian corridors;
- Provision of stormwater detention and treatment infrastructure;
- Maintenance of overland flow paths;
- Establishment of setbacks from waterways to address lateral spreading; and
- Use of engineered fill and geotechnical design requirements for building platforms.

The geotechnical assessment confirms that, while natural hazards are present, they can be appropriately managed and do not preclude development of the site.

Overall NPS-NH Conclusion

The technical assessments demonstrate that:

- The site is subject to flooding, but this can be appropriately managed through subdivision design, stormwater infrastructure and finished floor level controls;
- Existing waterways and flood conveyance paths are retained and integrated into the development;
- Liquefaction risk is low to moderate and manageable through standard engineering and foundation design;
- Lateral spreading risk is mitigated through setbacks and design controls; and
- Landslip, rockfall, coastal hazards and active faults are not present.

Under the NPS-NH risk matrix, the identified hazards are low to moderate and capable of being avoided or mitigated through engineering design and planning controls.

Based on the assessment above, it is considered that the project is consistent with the NPS-NH.

6.1.2 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 (NPS-FM) set out an objective to ensure that natural and physical resources are managed in a way that prioritises:

- (1) The health and well-being of water bodies and freshwater ecosystems;
- (2) The health needs of people (such as drinking water); and
- (3) The ability of people and communities to provide for their social, economic and cultural well-being.

It is considered that the project is consistent with the relevant policies of the NPS-FM that relate to land development for the following reasons:

- The proposal provides opportunities for riparian restoration and ecological enhancement, improving freshwater quality and ecosystem health over time (Policy 5).
- Integrated stormwater management avoids adverse effects on freshwater and manages contaminants at source (Policies 6 and 7).
- Engagement with mana whenua is ongoing to ensure freshwater values are recognised and incorporated into design (Policy 2).
- Flood management and water-sensitive design support the health and safety of people and communities (Objective – Te Mana o te Wai hierarchy).
- Monitoring and adaptive management will ensure freshwater values are maintained and not degraded (Policy 13).

Based on the assessment above, it is considered that the project is consistent with the NPS-FM.

6.1.3 National Policy Statement for Indigenous Biodiversity 2023

The National Policy Statement for Indigenous Biodiversity ('NPS-IB') ensures the protection, maintenance and restoration of New Zealand's most threatened indigenous species. It is noted that the NPS-IB came into effect, gazetted on 4 August 2023. The NPS-IB was amended in 2025 (with provision taking effect from January 2026) in relation to quarrying and mining activities.

The project is consistent with the relevant objectives and policies of the NPS-IB for the following reasons:

- The site contains limited indigenous biodiversity values and no significant habitats or wetlands, meaning there is no loss of significant indigenous biodiversity (Objective 2.1).
- Existing indigenous vegetation corridors will be retained and integrated into the development where practicable (Policy 8).
- Opportunities for ecological enhancement are provided through riparian planting and habitat restoration, particularly along the Knights Stream, Halswell River, Nottingham Stream and the Creamery Drain corridors (Policies 13 and 14).
- Ecological assessments have been undertaken to identify values and confirm the absence of Significant Natural Areas (SNAs) (Policies 3, 6 and 7).
- A precautionary approach has been applied to ensure any potential adverse effects on biodiversity are appropriately identified and managed (Policy 3).

- Engagement with iwi is ongoing, providing for tangata whenua involvement in biodiversity management and restoration outcomes (Policies 1 and 2).

The proposal is consistent with the objective and relevant policies of the NPS-IB. The site contains limited indigenous biodiversity values and no SNAs, and the development will retain existing vegetation and incorporate ecological enhancement planting. As such, the proposal will maintain and enhance indigenous biodiversity while enabling urban development consistent with the intent of the NPS-IB.

Based on the assessment above, it is considered that the project is consistent with the NPS-IB.

6.1.4 National Policy Statement on Urban Development 2020

The NPSUD came into force on 20 August 2020 and replaced the National Policy Statement on Urban Development Capacity 2016. The NPSUD includes a focus on achieving well-functioning urban environments, promoting intensification within urban environments, such as Christchurch, as a means of increasing housing supply, supporting competitive land markets and improving affordability. There is now a much greater focus on:

- Introducing and defining the concept of well-functioning urban environments with a key component being the provision of a variety of homes that meet the needs of different households in terms of type, price and location. (Objective 1 and Policy 1);
- A greater emphasis on enabling more people to live in and more business to locate in areas that are near centres, planned public transport and where there is high demand (see Objective 3);
- A greater emphasis on improving housing affordability (see Objective 2);
- A greater emphasis on robust strategic planning and the need to integrate urban development with infrastructure (see Objective 6);
- Changing the policies from providing sufficient development capacity to providing at least sufficient development capacity (see Policy 2). This is coupled with other changes that direct Councils to provide more development capacity, and replacing 'minimum targets' with 'housing bottom lines';
- Being more directive about what it means for Councils to be 'responsive' in the urban environment with respect to Plan Changes (Policy 8); and
- Ensuring New Zealand's urban environments support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change (Objective 8, Policy 1(e)).

Overall, the proposal is considered to be consistent with the NPS-UD for the following reasons:

- The development will enable approximately 348 additional residential units contiguous with the Halswell urban area, materially increasing residential development capacity in a Tier 1 urban environment and supporting competitive land markets (Policies 1 and 2).
- The site is well connected to existing transport infrastructure and will provide new internal roads and walking and cycling connections, improving accessibility and supporting sustainable transport outcomes.
- Environmental constraints, including waterways and geotechnical considerations, can be appropriately managed through subdivision design and engineering mitigation measures.
- The proposal represents a significant addition to development capacity and is therefore consistent with the responsive planning approach anticipated by Policies 6 and 8.

- Engagement with mana whenua and incorporation of cultural values into waterway and landscape design will support Policy 9.

Based on the assessment above, it is considered that the project is consistent with the NPSUD.

6.1.5 National Policy Statement for Highly Productive Land

The National Policy Statement for Highly Productive Land 2022 (“NPS-HPL”) seeks to protect highly productive land for use in land-based primary production, both now and for future generations. The NPS-HPL came into effect on 17 October 2022 and has subsequently been amended in August 2024 and December 2025. The NPS-HPL sets out a process whereby the regional council is to undertake a mapping exercise and map HPL in its regional policy statement. That has not occurred, so the interim regime set out in clause 3.5(7) of the NPS-HPL applies. The interim regime requires land to be ‘zoned general rural or rural production at the (NPS) commencement date’ and ‘LUC 1, 2 or 3’. For the latter, the AgriBusiness Group assessment (**Attachment 10**) prepared for Franco Farms Ltd confirms that the application site contains a mix of LUC Class 1 and 2 soils as mapped by the New Zealand Resource Inventory.

For the former, it can be argued (and a FTAA Panel has reached this conclusion in a draft decision) that part of the site is not ‘zoned general rural or rural production’. If that is correct, part of the site is not HPL and the NPS-HPL does not apply to that part of the Site. However, it does apply to the part of the Site located in the Selwyn District and zoned General Rural. If the Panel’s findings in the draft Pound Road decision were incorrect, and the site is ‘zoned general rural or rural production’, all of the site is Highly Productive Land (HPL) and would engage the protective purpose of the NPS-HPL, as well as Policies 4, 7, 8 and 9 (in particular). This referral application therefore assesses the purpose, those policies and includes an assessment against clauses 3.8, 3.9 and 3.10 of the NPS, for all of the Site.

Notwithstanding the LUC 1 and 2 classifications in the New Zealand Resource Inventory, the AgriBusiness Group assessment identifies several limitations affecting the overall productive capacity of this land which are outlined below, before turning to the specific criteria in clause 3.10 of the NPS-HPL. First, the question of whether the CCC part of the Site meets the NPS definition of HPL is explored.

Is the Site ‘zoned General Rural or Rural production’?

The applicant accepts the portion of the site within SDC is considered a rural zone in terms of the NPS-HPL.

The NPS-HPL refers to the general rural or rural production zones. CCC has not yet implemented the National Planning Standards, so to apply clause 3.5(7)(a)(i), you must identify what is the nearest equivalent zone in the Christchurch District Plan, to both general rural and rural production.

In the Pound Road fast-track decision², the Panel found that the CDP’s Rural Urban Fringe Zone is not the nearest equivalent to either the NPS general rural (GU) or rural production (RP) zones. The Panel considered that, while the GU and RP zones share a broad objective recognising land-based primary production, the CCC’s Rural Urban Fringe Zone’s rule framework, subdivision standards, small minimum lot sizes, anticipated non-rural activities, and limits on intensive farming show that its predominant purpose is managing rural living and peri-urban development rather than protecting land for primary production.

² Pound Road Industrial Development [FTAA-2505-1057] - Record of Decision of the Expert Consenting Panel under Section 87 of the Fast-Track Approvals Act 2024, Dated 1 May 2026.

On that basis, the Panel in the Pound Road draft decision found that treating Rural Urban Fringe Zone land as highly productive land would protect a primary production opportunity that the zoning framework itself does not realistically anticipate. The Panel therefore concluded the Rural Urban Fringe Zone is not equivalent to the General Rural or Rural Production zones for the purposes of clauses 1.3(4) and 3.5(7), and that the Pound Road site was not highly productive land under the interim definition. This reasoning is relevant to the Franco Farms site, noting that part of the site is zoned Rural Urban Fringe.

In the Ryans Road fast-track decision³, the Panel agreed with CCC's legal opinion that the nearest equivalent zone to the Rural Urban Fringe Zone is the General Rural Zone and that therefore the NPS-HPL applies. They found that the CDP's rural zone objectives and policies consistently refer to and seek to maintain rural productive activities occurring in all rural areas, including the Rural Urban Fringe (e.g. Objective 17.2.1.1 clauses (i) and (ii), Policy 17.2.2.4(ii) and Policy 17.2.2.3(c)) and provide for a range of activities in rural zones that are largely limited to those activities which have a direct relationship with or are dependent on the rural resource and rural productive activity, or have a functional, technical or operational necessity for a rural location (Policy 17.2.2.1).

Even if the NPS-HPL were applicable, below is an assessment under Clause 3.10 of the NPS-HPL enabling the proposal to proceed.

CRC's draft HPL maps

While the interim regime identifies the site as a mix of LUC Class 1 and 2 soils (and therefore HPL), the CRC has produced draft maps of its highly productive land in the region for the purposes of the NPS-HPL as part of its Draft Canterbury Regional Policy Statement 2024. This draft mapping does not identify the Site as "highly productive land". While the transitional definition of "highly productive land" continues to apply until any such mapping is operative and noting that the CRC has placed the development of its new Regional Policy Statement on hold, it does indicate this land may not be "highly productive land" under the NPS-HPL in the future.

³ The Ryans Road Industrial Development FTAA 2504-1054 - Record of Decision of the Expert Consenting Panel under Section 87 of the Fast-Track Approvals Act 2024, 7 May 2026

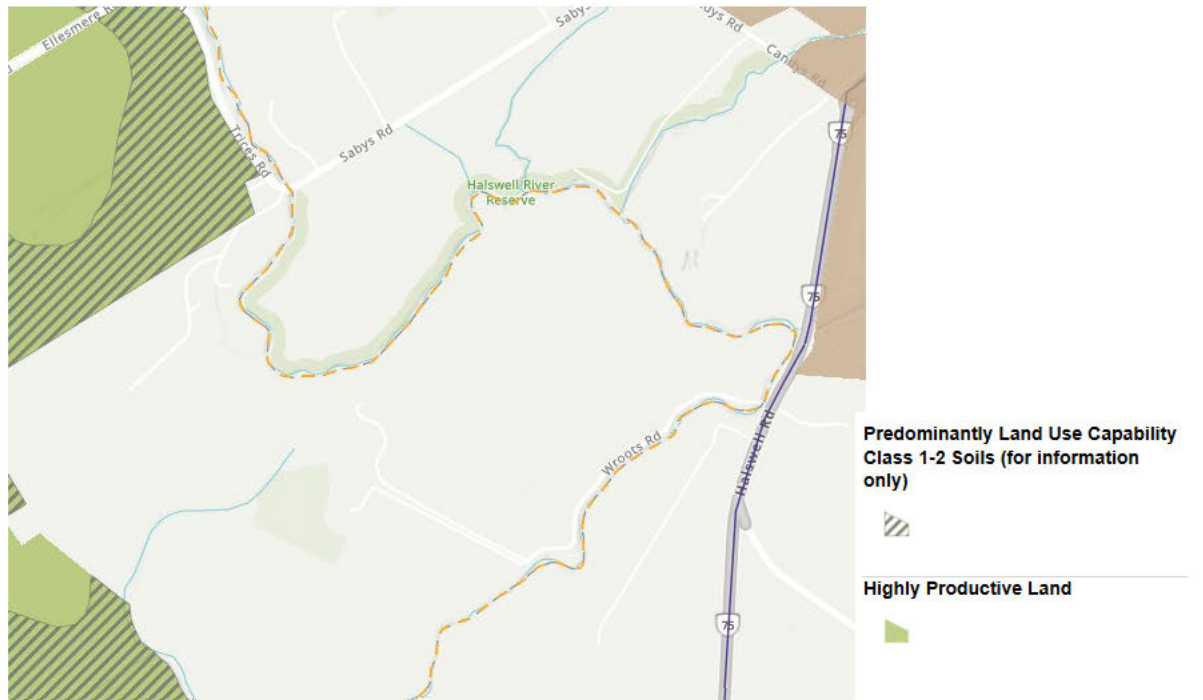


Figure 13: Highly productive land mapping within the draft CRPS

Site Constraints Affecting Economic Viability

The property at 6 Wroots Road is 14ha in area and Lot 2-3 Deposited Plan 68573 is 34ha in area, with approximately 13ha zoned Residential New Neighbourhood and approximately 21ha of the site zoned rural. Importantly, the parcels of land are separated from another by the Halswell River preventing it from achieving the economies of scale needed to achieve economic viability. According to the Agribusiness assessment this scale is insufficient for farm system types such as arable and dairy systems. The effective rural landholding is fragmented and insufficient to achieve the economies of scale required for commercial arable, dairy or intensive horticultural systems. At this scale, the land cannot operate as a viable stand-alone primary production enterprise.

Irrigation constraints

The application site does not currently hold consent for irrigation, and it is located within the Selwyn–Waimakariri groundwater allocation zone, which is over-allocated for irrigation takes. As a result, sites without existing irrigation rights cannot obtain access to irrigation water (that is a prohibited activity⁴) unless an existing consent can be transferred to the property. In over-allocated surface water catchments or groundwater zones, a proportion of any transferred allocation must be surrendered and is not reallocated, unless a defined method and timeframe to phase out over-allocation is provided in the relevant sub-regional section of the Plan. Within the Christchurch West Melton–Selwyn–Waimakariri section, where a transfer occurs within the Combined Surface and Groundwater Allocation Zones, 50 percent of the transferred volume must be surrendered unless the water is to be used for a community water supply, or for an industrial or trade process that achieves a neutral or positive water balance. Even if a transfer were secured, a new well would need to be drilled to access water, at an estimated cost of approximately \$55,300, excluding the additional costs of acquiring half of an existing irrigation consent and installing the necessary

⁴ Rule 5.130 within the Canterbury Land and Water Regional Plan - The taking and use of groundwater that does not meet one or more of conditions 2 or 3 in Rule 5.128 is a prohibited activity.

infrastructure to apply the water. The AgriBusiness Group assessment states the cumulative cost of securing irrigation access would render it economically unviable for the site. Further, the site's limited scale and location constrain the potential economic benefit of irrigation. A prudent operator would be more likely to establish operations on a larger landholding, where the significant upfront costs of water access and infrastructure could be distributed over a greater area, improving overall viability.

Intensive horticulture

The potential for intensive horticultural land use has been considered and has been rejected for several important reasons including: the very high cost of establishment of an intensive horticultural operation on a relatively small site; the lack of irrigation capability which is essential for horticultural crops; and the cold winters limit the potential range of horticultural crops.

Integration into larger farming systems

The ability to maximise the productivity of any of the potential arable land uses would require that the land was farmed as part of a larger farming entity and that irrigation capability was available to promote certainty of crop yields. The block of land would have to be incorporated into a bigger growing operation in order to achieve sufficient scale to enable the landowner to maximise productivity. Additionally, there are no large-scale arable operations in direct proximity, meaning that machinery and equipment would need to be transported through high traffic areas. This makes the application site unappealing for existing arable operators. The site's small scale, lack of irrigation and location makes it an unattractive option for integration into a larger farming operation.

Pastoral grazing

It would be theoretically possible for the land to be used for pastoral grazing (sheep and beef and dairy support) however there are several significant constraints on that land use being achieved. The constraints include:

- The costs associated with intensifying the productivity of the site e.g. providing for winter crops, and providing additional supplementary feed from off site, are all too expensive to be justified on such a small scale.
- The fact that the site is unable to be irrigated means that in most years, it would lack sufficient moisture over the summer months to maintain the stocking rate, so there would need to be less livestock during that period.
- The location of the site being so close to residential housing may cause some reverse sensitivity issues if farmed too intensively and cause issues moving stock etc.
- The scale of the site is too small to offer a prospective farmer any real advantage in farming the site.

The NPS-HPL assessment concludes that the application site would not be an appealing option for a farmer looking to expand their pastoral productive land due to its size, location, and absence of irrigation.

Clause 3.10 Assessment

Clause 3.8 requires territorial authorities to avoid the subdivision of highly productive land unless one of the specified exemption pathways applies. None of the clause 3.8 exemptions apply to this proposal.

Clause 3.9 requires territorial authorities to avoid the inappropriate use or development of highly productive land for activities that are not land-based primary production, unless one of the specified exceptions applies. The proposal is not land-based primary production and none of the clause 3.9 exceptions apply.

Clause 3.10 of the NPS-HPL provides an exemption pathway where highly productive land (HPL) may be subdivided, used or developed for activities not otherwise enabled under clause 3.8 and 3.9 (relevantly), provided it can be demonstrated that (a) there are permanent or long-term constraints that mean the land cannot be economically viable for land-based primary production for at least 30 years, and (b) that the additional tests in clause 3.10(1)(b) and (c) are met. Clause 3.10(2) sets out examples of options that would retain the productive capacity of the HPL, that may be assessed in order to satisfy 3.10(1)(a). The attached AgriBusiness Group (**Attachment 10**) assessment prepared for Franco Farms Ltd concludes that the subject land meets each limb of the clause 3.10 test. In summary:

Permanent or long-term constraints (clause 3.10(1)(a)) – the site is subject to significant and enduring constraints. These include lack of irrigation consent within an over-allocated groundwater zone, high costs associated with securing and transferring water permits, and proximity to urban residential development. The AgriBusiness Group assessment evaluates alternative production options, irrigation solutions, amalgamation, leasing and improved land management strategies, and concludes that none are reasonably practicable to restore economic viability. Financial modelling based on lifestyle grazing demonstrates that the land cannot generate sufficient returns to cover interest, management and capital costs, resulting in a substantial annual shortfall. On this basis, the land cannot be economically viable for primary production for at least 30 years.

Avoidance of significant loss or fragmentation (clause 3.10(1)(b)) – The assessment finds that the loss of 48ha of HPL represents a very small proportion of the total LUC 1–3 land within both the Selwyn and Christchurch districts and is therefore not significant in either an individual or cumulative sense. The proposal does not fragment a large, geographically cohesive block of productive land, and surrounding land uses are predominantly lifestyle and residential, limiting reverse sensitivity effects.

Benefits outweigh costs (clause 3.10(1)(c)) – A qualitative cost–benefit assessment within the Agri-Business report across environmental, social, cultural and economic domains concludes that the net effects of development are positive. Environmental effects associated with ongoing primary production (including nutrient losses and greenhouse gas emissions) would reduce, while increased vegetation and stormwater design would provide ecological and climate regulation benefits. Social and economic benefits include increased housing supply, employment generation and wider community economic gains. Given the site’s limited productive capacity and lack of economic viability for primary production, the economic and social gains of development are considered to outweigh the long-term costs associated with the loss of HPL.

Overall Consistency with the NPS-HPL

While the proposal involves urbanisation of land classified as Highly Productive Land, the NPS-HPL assessment demonstrates that:

- The land is subject to permanent and long-term constraints that preclude economically viable primary production;
- The loss does not constitute significant erosion or fragmentation of the district's HPL resource; and
- The environmental, social and economic benefits outweigh the long-term costs.

Accordingly, and having applied clause 3.10 directly, the proposal is not inconsistent with the NPS-HPL.

6.1.6 National Policy Statement for Infrastructure 2025

The National Policy Statement for Infrastructure 2025 (NPS-I) recognises that infrastructure is essential to enabling the social, economic, cultural and environmental wellbeing of communities, both now and in the future. Franco Farms is consistent with this objective, as it enables approximately 350 additional dwellings in a location that forms a logical extension of the existing Halswell urban area and integrates with established transport and three waters networks. The development will both rely upon and deliver infrastructure, including internal roading, water supply, wastewater reticulation, stormwater management systems and associated open space and riparian corridors. In doing so, it supports housing supply and contributes to a well-functioning urban environment supported by appropriate infrastructure.

The NPS-I also promotes integrated, strategic and efficient infrastructure planning. The proposal consolidates growth adjacent to existing residential neighbourhoods and avoids ad hoc or isolated rural expansion. Infrastructure can be extended from established servicing catchments, reducing duplication and improving efficiency relative to dispersed rural lifestyle development. The site's proximity to both Candys Road and Sabys Road and the wider Halswell transport network enables connectivity with existing infrastructure corridors, while master planning allows for coordinated staging and integration with the surrounding urban area. This approach is consistent with the NPS-I direction to optimise the use of existing infrastructure capacity before requiring significant new or remote infrastructure investment.

In terms of resilience and environmental management, the proposal incorporates stormwater attenuation, riparian setbacks and ecological enhancement along the Halswell River, Knights Stream and Nottingham Stream. The ecological constraints assessment confirms that no natural inland wetlands are present within the site and that potential adverse effects on waterways and indigenous fauna can be appropriately managed through design, mitigation and regulatory processes. By incorporating water-sensitive urban design principles and protecting riparian margins, the proposal supports resilient infrastructure outcomes that respond to freshwater values and climate change considerations, consistent with the NPS-I.

Overall, the proposal recognises the functional and operational needs of infrastructure, provides for its development and upgrading in response to projected growth, and appropriately manages environmental effects. It therefore aligns with the objectives and policy direction of the National Policy Statement for Infrastructure 2025 by enabling infrastructure necessary to support housing supply and urban wellbeing, while maintaining integrated, efficient and resilient infrastructure outcomes.

6.1.7 New Zealand Coastal Policy Statement

The New Zealand Coastal Policy Statement ('NZCPS') sets out a number of objectives and policies for achieving the purpose of the RMA in relation to the coastal environment of New Zealand. As the application site is not located within close vicinity to the coastal environment, it is considered that the NZCPS is not relevant to the proposed activity.

6.1.8 National Policy Statement on Electricity Transmission

The application site does not contain land that is directly impacted by the NPS on Electricity Transmission.

6.1.9 National Policy Statement on Renewable Electricity Generation

The application does not relate to renewable electricity generation.

6.1.10 National Policy Statement on Greenhouse Gas Emissions from Industrial Process Heat

The application does not involve industrial process heat.

6.2 National Environmental Standards

6.2.1 National Environmental Standards for Air Quality

The Resource Management (National Environmental Standards for Air Quality) Regulations 2004 ('NES-AQ') sets standards to guarantee a minimum level of health protection for people living in New Zealand. No specific consents relating to this standard are required for the project, although the relevant regulations in the NES-AQ have informed the assessment of construction and operational air quality effects. The potential for effects on air quality in relation to the project relate primarily to dust during the construction phase. Measures are proposed to manage potential effects in response to the air quality objectives and policies. The management of dust and odour will be addressed in the Construction Management Plan and an ESCP. As such, ambient air quality will be maintained once Franco Farms is constructed.

6.2.2 National Environmental Standards for Freshwater 2020

The Resource Management (National Environmental Standards for Freshwater) Regulations 2020 ('NES-F') regulate activities that may adversely affect freshwater bodies, natural inland wetlands and fish passage. The application site contains spring-fed plains waterways, including Nottingham Stream, Knights Stream and the upper Halswell River, together with artificial drainage channels. The ecological assessment confirms that no natural inland wetlands are present within the application site, and no reclamation of natural rivers or streams is proposed. Accordingly, the wetland provisions of the NES-F are not triggered. Potential freshwater-related effects are limited to matters such as sedimentation during earthworks, temporary bed disturbance associated with crossings, and the need to maintain fish passage. Any new culverts or in-stream structures will be designed to comply with national fish passage requirements, and construction will be undertaken in accordance with best-practice erosion and sediment control measures to protect water quality and aquatic habitat. On this basis, the proposal is not inconsistent with the NES-F, and any resource consent requirements relating to stream works or discharges can be appropriately addressed at the substantive application stage.

6.2.3 National Environmental Standards for Sources of Human Drinking Water

The National Environment Standard for Sources of Human Drinking Water ('NES-DW') set requirements for protecting sources of human drinking water from becoming contaminated. The NES-DW requires regional councils to ensure that effects of activities on drinking water sources are considered in decisions on resource consents and regional plans. Specifically, regional councils are required to:

- Decline permits that are likely to result in community drinking water becoming unsafe for human consumption following existing treatment.
- Be satisfied that permitted activities in regional plans will not result in community drinking water supplies being unsafe for human consumption following existing treatment.
- Place conditions on relevant resource consents that require notification of drinking water suppliers if significant unintended events occur (e.g., spills) that may adversely affect sources of human drinking water.

Consideration will be given to the effects of the proposed bulk earthworks and any associated dewatering take and discharge against applicable regulations under the NES-DW. There are no drinking water supplies downstream of the application site that could potentially be affected by this proposal.

6.2.4 Regional and District Planning Framework

An assessment of the relevant regional and district planning documents is at **Attachment 11**.

7.0 Treaty Settlements

Section 7 of the FTAA requires all persons performing and exercising functions, powers, and duties under the Act must act in a manner that is consistent with the obligations arising under existing treaty settlements, while Section 16 sets out the requirements for the Minister.

Treaty settlements with the following iwi/groups are therefore of relevance to the project area:

- Te Rūnanaga o Ngāi Tahu

The Ngāi Tahu Claims Settlement Act 1998 is an act of parliament passed in New Zealand relating to Ngāi Tahu, the principal Māori iwi (tribe) of the South Island. The purpose of the Act is to settle all of the tribe's claims under the Treaty of Waitangi, and to record an apology to Ngāi Tahu from the Crown, in regard to past failures to protect the tribe's interests. The settlement of Ngāi Tahu's treaty claim does not directly relate to the applicant's land, but to the wider Canterbury area. The site does not involve any statutory acknowledgement areas. Notwithstanding this, any project needs to consider the protection of:

- Historic resources;
- Riparian margins;
- Water quality;
- Indigenous vegetation; and
- Taonga species

The Ngāi Tahu Claims Settlement Act 1998 includes a table of taonga species (attachment 12.148), which include.

- Ti rākau/Cabbage Tree/*Cordyline australis*
- Kāhu/Australasian harrier/*Circus approximans*
- Karoro/Black backed gull/*Larus dominicanus*
- Koparapara or Korimako/Bellbird/*Anthornis melanura melanura*
- Pākura or Pūkeko/Swamp Hen or Pukeko/*Porphyrio porphyrio*
- Pihoihoi/New Zealand pipit/*Anthus novaeseelandiae*
- Pīwakawaka/South Island Fantail/*Rhipidura fuliginosa fuliginosa*
- Poaka/Pied stilt/*Himantopus himantopus*
- Pūtakitaki/Paradise shelduck/*Tadorna variegata*

These matters are being taken into consideration and further details will be provided at the substantive stage, including landscaping plans incorporating the taonga species and the development of the riparian margins adjoining Knights Stream, Halswell River and Nottingham Stream.

No areas covered by a statement of association, statutory acknowledgement or any other form of cultural or commercial redress provided in the Ngāi Tahu Claims Settlement Act 1998 would be directly affected by the project. As a general principle, an absence of specific settlement redress does not indicate the absence of an iwi's cultural association with ancestral lands, sites, wāhi tapu or other taonga within an area.

Therefore, the applicant has acknowledged the cultural relationship of Ngāi Tahu within its rohe and in demonstrating this, have contacted them along with Mahaanui Kurataiao Limited and Whitiara Centre Limited regarding engagement on the proposed development. This is outlined further in the consultation summary (**Attachment 12**).

8.0 Engagement and Consultation, and record of response to section 11(1)(b) notice

Ongoing engagement has been undertaken with administering agencies, iwi and key stakeholders as summarised below. A section 11(1)(b) notice was emailed to all relevant stakeholders on 15 April 2026.

A summary of key discussions is set out below and further details are provided at the Record of Consultation and Engagement Summary at **Attachment 12**.

- **Iwi and hapū:** Contact has been made with Mahaanui Kurataiao Limited, Whitiara Centre Limited and Te Rūnanga o Ngāi Tahu to advise of the proposal and seek feedback from these iwi agencies and Te Rūnanga if the project is of interest.
 - Mahaanui Kurataiao Limited: a hui was held with 11 March 2026. Following this hui preliminary advice was received from both Te Hapū o Ngāti Wheke (Rāpaki) and Te Taumutu Rūnanga providing a draft set of consent conditions which are attached to this application. The applicant proposes to continue engagement with Mahaanui Kurataiao Limited so as to incorporate their proposed consent conditions into the proposal.
 - Whitiara Centre Limited: a hui was held with 16 March 2026. Following this hui a summary of consultation was received on 20 March 2026 and is attached to this application. In summary, Whitiara Centre Limited emphasises the importance of protecting waterways through appropriate

setbacks, planting, and legal mechanisms to prevent future encroachment. Key concerns relate to earthworks management, stormwater and wastewater servicing, protection of freshwater habitats, and the incorporation of indigenous species, with further information requested on stormwater design, waterway protection, ecological values, and site hydrology as part of the information required for the substantive application. The applicant proposes to continue engagement with Whitiora Centre Limited through the substantive phase of the project.

- Te Rūnanga o Ngāi Tahu: A letter was received on 16 April 2026 in response to the applicant initial email contact on 27 February 2026. The letter advises that the expectation of Te Rūnanga is that full consultation will occur with the relevant Papatipu Rūnanga (before the lodgement of any application).
- **Canterbury Regional Council (CRC):** A meeting was held with CRC staff in December 2025 to discuss the proposal. No significant issues were raised by CRC. The applicant intends to continue engagement with CRC as the project progresses. Minutes from this meeting are attached to this application. A further meeting was held with the CRC on 17 April 2026 to provide an update on the project and a timeframe for lodgement. The CRC was emailed the draft reasons for consent following this meeting. Received formal response from the CRC on 14 May 2026 which provides preliminary, non-binding technical/planning guidance and encourages early sharing of draft assessments to resolve consenting issues before substantive lodgement. The draft scheme plan and technical reporting attached to this memo addresses the matters raised by the CRC at a high-level, which includes servicing options, economics, HPL matters, urban design and ecology. The applicant intends to continue engagement with CRC as the project progresses and share draft technical assessments.
- **Christchurch City Council (CCC):** Meetings were held with CCC staff in December 2025 and February 2026 to discuss the proposal. CCC's preference is for any residential development in this area to be undertaken via strategic planning processes. Servicing was also discussed in detail at the meetings. The applicant will continue to work through the servicing requirements with CCC as part of the preparation of a substantive application. Received letter acknowledging Sabys 101's intent to lodge a fast-track referral for the Franco Farms residential development on 14 May 2026. The letter states the information provided is high-level and insufficient for detailed comment and outlines key matters to address at referral stage, including clear national/regional benefits, why fast-track is needed, approvals/programme/staging, effects, and concept infrastructure servicing. The letter also flags major constraints/risks around out-of-sequence greenfield development and significant servicing issues—particularly wastewater capacity and funding of required upgrades, plus water supply upgrades, stormwater discharge/ownership issues (stormwater facility in Selwyn, separate discharge consent, conveyance across Knights Stream), transport capacity pressures, and design concerns (waterway oversight, narrow streets, park sizing). The draft scheme plan and technical reporting attached to this memo addresses the matters raised by CCC at a high-level, which includes servicing options, economics, transport, urban design and ecology. The applicant intends to continue engagement with CCC as the project progresses.
- **Selwyn District Council (SDC):** A meeting was held with SDC in December 2025. The location of the site within Rural Zoned SDC land but near urban Christchurch was noted. With respect to water, wastewater and stormwater and cross boundary issues, staff noted that they could make this work via an agreement or easement between the councils SDC provided a section 11 notification response (Geoff Deavoll) noting comments are made without reviewing a draft referral/AEE and questioning the basis for "significant regional benefit" under the FTAA. SDC noted most of the development is within CCC,

and raised key implementation/consenting matters for the Selwyn portion including: (1) the need for servicing agreements between SDC/Selwyn Water/CCC and the developer for potable water and wastewater (including DCs and vesting/easements); (2) uncertainty around stormwater reserve design/treatment and ongoing management costs/DC offsets; (3) the site is LUC 2/HPL under the interim NPS-HPL definition and subdivision is likely constrained with permanent loss of HPL a significant adverse effect to be accounted for in economic assessment; and (4) potential effects on Hohepa Homes Trust (Special Purpose Zone) with consultation recommended at substantive stage. The applicant intends to continue engagement with SDC as the project progresses and will organise engagement with Hohepa Homes Trust.

- **New Zealand Transport Agency (NZTA):** A meeting was held 23 March 2026 and requested that a draft ITA is provided to NZTA for comment prior to lodgement of a substantive application. The applicant received email receipt from NZTA on 12 May 2026 regarding the notice of intent to lodge a referral application under the Fast-track Approvals Act for the Franco Farms development at Candys Road, Halswell. The email outlines that NZTA has not yet reviewed the full referral application, but has reviewed a high-level traffic and transport assessment dated 30 April 2026 and supports its recommendation that a full Integrated Transport Assessment (ITA) be prepared at the next stage. NZTA expects the ITA to assess effects on key intersections at State Highway 75 with Candys Road and Sparks Road, as well as impacts further east and north, given likely travel patterns to Christchurch city centre. NZTA requests that, once lodged, a copy of the FTAA referral application be provided to them and that they be given the opportunity to comment on it. The applicant intends to continue engagement with NZTA as the project progresses.
- **Department of Conservation (DoC):** A meeting was held 3 March 2026 and a pre-lodgement consultation summary received which is attached to this application. The applicant intends to continue engagement with DoC as the project progresses and more detailed investigations undertaken as part of the substantive application, which includes ecology to determine the presence of lizards and bats at the site.
- **Heritage New Zealand Pouhere Taonga (HNZPT):** A meeting was held on 2 March 2026 to discuss the proposal and the potential for an archaeological authority. Based upon the advice from HNZ and archaeological report is currently being obtained, and a further meeting will be held with HNZ once this report has been completed. Received email response to notice of lodgement on 5 May 2026 which noted the following:
 - Based on a desktop review of the location, there appears to have been human activity prior to 1900
 - We recommend consulting a suitably qualified archaeologist to confirm this and the potential for archaeological material to be present
 - If the works may modify or destroy an archaeological site, then an authority will be required prior to any works beginning
 - An authority can be applied for under the Heritage New Zealand Pouhere Taonga Act 2014, or as a part of a fast-track application

The advice also contained a draft example set of consent conditions. The applicant will meet with HNZT once the draft archaeological report has been completed.

9.0 Conclusion

The proposed Franco Farms development represents a well-planned residential expansion that has been demonstrated to have significant regional benefits. It will contribute positively to housing supply and the efficient use of urban land. The master-planned layout provides a connected transport and reserve network, integrates stormwater management and infrastructure servicing, and has been designed with regard to the site's environmental characteristics and surrounding context. Technical assessments undertaken to support the application confirm that potential environmental effects can be appropriately avoided, remedied, or mitigated through the proposed design and through the implementation of standard management measures. The proposal therefore represents an appropriate and sustainable form of urban development.

In addition to providing significant new housing opportunities, the development will contribute to the social and economic wellbeing of the community by supporting population growth, enabling investment in infrastructure, and creating a cohesive new neighbourhood.

The key regional and project benefits include:

- Delivery of a substantial number of new residential lots within a recognised growth area, contributing to housing supply and affordability;
- Efficient use of land adjacent to existing urban development, supporting consolidated urban form and infrastructure efficiency;
- Provision of integrated transport, walking and cycling connections that improve accessibility and connectivity within the wider network;
- Delivery of coordinated three waters infrastructure and stormwater management systems;
- Economic benefits through construction activity, infrastructure investment, and support for population growth in the southwest Christchurch area;
- Creation of a well-designed, master-planned neighbourhood with associated open space and amenity values; and
- Streamlined and coordinated consenting outcomes (particularly across Christchurch City and Selwyn District boundaries), enabling efficient implementation of the development.

For these reasons, the proposal is considered suitable for referral and assessment through the fast-track consenting process.