

From: [Infrastructure Portfolio](#)
To: [FTArefferrals](#)
Subject: FW: CORPG4954 / Invitation to comment on Fast-track referral application for the Franco Farms Project under the Fast-track Approvals Act 2024 – FTAA-2604-1219
Date: Tuesday, 30 June 2026 9:46:48 am

From: Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Sent: Tuesday, 30 June 2026 9:39 AM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Cc: Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Subject: RE: CORPG4954 / Invitation to comment on Fast-track referral application for the Franco Farms Project under the Fast-track Approvals Act 2024 – FTAA-2604-1219

Good morning,

No comment from Minister for Arts, Culture and Heritage.



Office of Hon Paul Goldsmith

Minister for Arts Culture and Heritage | Minister of Justice
Minister for Media and Communications | Minister for Pacific Peoples
Minister for the Public Service and Digitising Government
Minister for Treaty of Waitangi Negotiations

Email p.goldsmith@ministers.govt.nz | www.beehive.govt.nz

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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Please note information about meetings related to the Ministers' portfolios will be proactively released (this does not include personal or constituency matters). For each meeting in scope, the summary would list: date, time (start and finish), brief description, location, who the meeting was with, and the portfolio. If you attend a meeting with the Minister on behalf of an organisation, the name of the organisation will be released. If you are a senior staff member at an organisation, or meet with the Minister in your personal capacity, your name may also be released. The location of the meeting will be released, unless it is a private residence. The proactive release will be consistent with the provisions in the Official Information Act, including privacy considerations. Under the Privacy Act 1993 you have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, or are concerned about the release of your information in the meeting disclosure, please contact the sender. You can read more about the proactive release policy at <https://www.dia.govt.nz/Proactive-Releases#MS>

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Monday, 22 June 2026 8:12 am
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Shane Jones (MIN) <S.Jones@ministers.govt.nz>; Nicola Grigg (MIN) <N.Grigg@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Cc: FTArefferrals <ftarefferrals@mfe.govt.nz>
Subject: CORPG4954 / Invitation to comment on Fast-track referral application for the Franco Farms Project under the Fast-track Approvals Act 2024 – FTAA-2604-1219

To:

- Minister for Economic Growth
- Minister for Regional Development
- Minister for the Environment
- Minister for Māori Crown Relations: Te Arawhiti
- Minister for Māori Development
- Minister of Conservation
- Minister for Arts, Culture and Heritage
- Associate Minister of Housing

NOTE - This project lodged an application after 31 March 2026, therefore a 15-day comment period applies.

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister), has asked for me to write to you on his behalf.

The Minister has received an application from Sabys 101 Limited for referral of the Franco Farms Project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA- 2604-1219).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **15 working days** of receipt of this email, being **14 July 2026**. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister’s decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferrals@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Minister for Infrastructure’s office they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform my office and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	Franco Farms Project
Applicant	Sabys 101 Limited

Location	Halswell, Christchurch
Project description	The project is to establish and construct an urban development over approximately 35 hectares to deliver approximately 350 residential lots (to enable future housing construction) with supporting infrastructure (roading, three waters services, stormwater management), neighbourhood centre services and amenities, and riparian enhancement.

Kind regards,



Office of Hon Chris Bishop

Attorney-General | Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport | Associate Minister of Finance | MP for Hutt South

Office: 04 817 6802 | EW 6.3

Email: c.bishop@ministers.govt.nz Website: www.Beehive.govt.nz

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Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing

By email: infrastructure.portfolio@parliament.govt.nz

Tēnā koe Minister Bishop,

Invitation to comment on the Franco Farms Project under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on the **Franco Farms Project** under section 17 of the Fast-track Approvals Act 2024.

I have considered the application and its alignment with my portfolios as Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report prepared by the Ministry for the Environment.

Nāku noa, nā

Hon Tama Potaka

Te Minita mō Te Arawhiti me Te Minita Whanaketanga Māori
Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

Hon Tama Potaka

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing



21 July 2026

Hon. Chris Bishop
Minister for Infrastructure
Infrastructure.portfolio@parliament.govt.nz
Parliament Buildings
Private Bag 18041
WELLINGTON 6160

CORTP-8336

Tēnā koe Hon. Bishop

Thank you for your invitation to comment on the fast-track consent application for the Franco Farms development in Halswell, Christchurch. The proposal comprises an urban development across approximately 35 hectares to deliver around 350 residential lots, together with supporting infrastructure, neighbourhood centre services and amenities, stormwater management, and riparian enhancement. The development would extend the existing residential neighbourhood of Halswell.

Christchurch continues to experience strong housing demand. While Christchurch remains relatively less expensive than other main centres, home prices and rents have outpaced national trends over recent years. In the three years to March 2026, rents in Christchurch increased by 14.7 percent compared with 4.3 percent nationally, while house prices increased by 8.5 percent compared with a 1 percent decline nationally. Significant greenfield residential capacity was enabled following the Canterbury earthquakes. The scale of the proposal would provide a substantial increase in housing supply and help meet future housing demand in the city.

The site is currently zoned Rural Urban Fringe and General Rural but is located adjacent to the existing urban area and would extend the established residential area of Halswell. The development is within a short driving distance of amenities in Halswell. While there is not currently convenient access to public transport, a bus route terminates nearby.

The proposal is expected to deliver positive housing and community benefits through increased housing capacity, supporting infrastructure, neighbourhood services and environmental enhancements. While we are not aware of any significant infrastructure constraints, the planning application identifies matters requiring further assessment, including wastewater servicing capacity, flood management, and natural hazard considerations. These matters can be worked through at the detailed consenting stage. From the perspective of the Housing Portfolio, I have no objection to this application being referred to the next stage of the fast-track process. Thank you again for the opportunity to comment.

Mauriora,

Hon Tama Potaka
Associate Minister of Housing



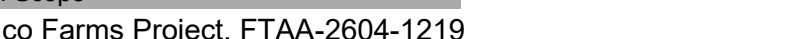
20 July 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0035054

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on the following referral applications:

- Out of Scope
 - Franco Farms Project, FTAA-2604-1219
 - Out of Scope
- 
- | Item | Length (approximate) |
|--|----------------------|
| • Out of Scope | 45% |
| • Franco Farms Project, FTAA-2604-1219 | 55% |
| • Out of Scope | 75% |
| | 35% |
| | 65% |
| | 95% |
| | 45% |
| | 55% |

I am providing comment in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided in their referral applications.

Out of Scope

Out of Scope

Franco Farms Project, FTAA-2604-1219

This proposal is to establish a 35-hectare urban development to deliver approximately 350 residential lots and enable future housing construction at Sabys Road in Halswell, Christchurch. The development includes a neighbourhood centre, roading networks, stormwater management systems and other related infrastructure. This proposal is expected to enable further residential development in the area, adjacent to the northern end of the site which has already been zoned for residential use.

Based on the independent economic assessment provided by the applicant, the economic benefit of the proposal is concentrated during its four-year construction and development period. During this time, the development is estimated to have a direct one-time contribution of \$37 million to GDP, support around 74 direct FTE roles annually and generate \$25 million in direct wages and salaries. Indirect impacts are estimated to support a further 167 FTEs per year, contributing \$58 million in wages and salaries and \$101 million in GDP value-add over the same period. While the site comprises highly productive land, the analysis provided by the applicant suggests that the quantified economic benefits of the residential development are likely to outweigh the long-term loss of rural production.

Overall, the project is expected to provide short-term economic benefits during construction and longer-term benefits through increased housing supply and supporting infrastructure. The primary long-term benefit is the provision of additional housing to support a growing economy, and the proposal may therefore be considered under section 22(2)(a)(iii) of the Fast-track Approvals Act as contributing to increased housing supply, addressing housing needs, and supporting a well-functioning urban environment in Christchurch.

Out of Scope

water

Out of Scope

to

Out of Scope

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Out of Scope

[Redacted]

[Redacted]

[Redacted]

Yours sincerely



Hon Nicola Willis
Minister for Economic Growth

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Franco Farms
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Christchurch City Council		
*First name	Paul		
*Last name	Lowe		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Please refer to the attached letter for our comments on this application.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

6 August 2026

Stephanie Frame
Manager – Fast-track Operations
Fast-track Applications
Environmental Protection Authority
info@fasttrack.govt.nz

03 941 8999
53 Hereford Street
Christchurch 8013
PO Box 73013
Christchurch 8154

ccc.govt.nz

Fast-track Approvals Act 2024 – Christchurch City Council Comments on Referral Application of Franco Farms

Application Number:	FTAA-2604-1219
Christchurch City Council Reference:	RMA/2026/2402
Project Name:	Franco Farms Project
Applicant:	Sabys 101 Limited
Address:	101 Sabys Road and 6 Wroots Road (within Selwyn District)

1. The Christchurch City Council (CCC) received an invitation to provide written comments on the referral application for 'Franco Farms' (FTAA-2604-1219) under section 17(1)(a) of the Fast-track Approvals Act 2024 (FTAA).
2. The purpose of this memorandum is to provide comments under section 17(3) of the FTAA, provide answers to the questions from the EPA and provide general comments that are relevant to the Ministers decision under section 21 of the FTAA.

Executive Summary

3. There are significant concerns about the feasibility of the project due to the current infrastructure capacity constraints and the availability of funding to provide for additional network capacity required. Due to these matters, which have not been adequately addressed in the information provided, the project is not supported.
4. In relation to wastewater, there is not sufficient capacity to support additional greenfield development beyond that already anticipated by the District Plan, with recent modelling demonstrating that planned residential growth and urban intensification will fully utilise the available capacity over time. A new connection to the water supply network is also likely to require upgrades to existing water mains ahead of their planned renewal timeframe. As a result, the project has implications for the capacity and future planning of the wider supply network.
5. The proposed development is not currently provided for within Council's infrastructure planning or funding programmes. Enabling unplanned, out-of-sequence growth places additional pressure on infrastructure and services and create significant funding challenges. The costs of providing infrastructure capacity to facilitate the development has not been adequately assessed, including costs which would fall on CCC ratepayers, and therefore the overall benefits of the project may be overstated.
6. The project is also considered to be inconsistent with the Greater Christchurch Spatial Plan, Christchurch District Plan and parts of the Canterbury Regional Policy Statement and is not required to address any shortfall in housing capacity. CCC has recently demonstrated that sufficient housing capacity over the short, medium and long-term has been provided for through the implementation of Plan Change 14. Furthermore, insufficient information has been submitted to demonstrate that the project is consistent with the National Policy Statement – Highly Productive Land.
7. It is recognised that other matters, including in relation to stormwater, geotechnical, earthworks, and contamination are considered to not be prohibitive of a future development in this location and can be addressed in further detail at any substantive application stage, if the referral application is successful.

8. Section 27(3)(b) provides an opportunity for the Minister to direct information be provided with a substantive application. If a decision to refer the project is made, CCC considers that specific information provided at substantive stage would assist those requested to comment and an expert comment, including:
- An infrastructure capacity assessment that considers the downstream network capacity, including the capacity of the Christchurch Wastewater Treatment Plant, and should consider the capacity required to facilitate the urban growth that has been planned for through the District Plan.
 - An assessment of the upgrades required to facilitate the project, including water, wastewater network, wastewater treatment plant and roading. This will need to address how all necessary upgrades will be funded and align with CCC's maintenance, renewal, and upgrade programmes to ensure efficient provision of infrastructure in a manner that avoids re-work.
 - An economic assessment that considers the net benefits of the project, having regard to infrastructure costs and transfer effects, and provides quantification of the net benefits in regional terms.

Prior Council engagement

9. CCC Officers and representatives of the applicant have previously met to discuss potential development of the site and means through which this development could be facilitated.
10. CCC also provided a memorandum (dated 14th May 2026) to the applicant, providing comments under FTAA section 11(1)(c). This memorandum is included as Appendix 1 to this letter and should be read in conjunction with this response.

Scope of comments

11. Noting the timeframe for comments and high-level nature of comments sought, the information provided in this memorandum is of a general nature and not exhaustive.
12. Sections 17(3)(a) and 17(3)(b) provide the scope for Council to provide comments on a referral application.
13. Acknowledging the scope of the comments sought, specific attention has been turned to the matters specified by Ms Stephanie Frame, Manager – Fast-track Operations in the letter dated 22 June 2026. These are as follows:
- *Any application that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such application exist, please provide written confirmation.*
 - *The project area is located across the territorial boundary shared with Selwyn District Council (SDC), who is also a relevant local authority for this application. With this context, are there any cross-boundary jurisdiction matters that Christchurch City Council consider may affect the delivery of the project?*
 - *Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act)*
 - *Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of the Act).*
14. Whilst some specialist comments have been sought on the supporting information with the referral application, due to resourcing and timeframe constraints, not all supporting documents have been reviewed. It is noted that feedback provided is from specialists who are experienced in the coordination of greenfield subdivisions with comprehensive and detailed understandings of the necessary requirements for achieving well integrated, serviced, and designed urban environments.

Site and area context

15. The site has been identified as Lot 3 DP 68573 (having the address 101 Sabys Road), and 6 Wroots Road (being legally described as Part Lot 1 DP 1537, within Selwyn District). Lot 2 DP 68573 is held in the same record of title as Lot 3 DP 68573, albeit noting that no development is proposed on this part of the property.

16. Lot 2 DP 68573 is zoned Residential New Neighbourhood, and a subdivision consent RMA/2025/2041 has been granted for the creation of 206 residential allotments on Lot 2 DP 68573. As mentioned in previous correspondence, an area in which residential units are proposed in this development is required for the stormwater management facility of RMA/2025/2041.

Specific Questions from EPA

17. **Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.**

While there are no competing applications if a substantive application were to be lodged, an existing subdivision consent, RMA/2025/2041, requires that part of the area which the project seeks to residentially develop is required for stormwater management.

It should also be acknowledged the two other applications under the FTAA for large subdivisions in the surrounding area; each being at different stages in the process. While not competing applications, the servicing and infrastructure constraints present for this project will be exacerbated by these other applications. With all applications seeking connections to CCC infrastructure, each of these projects are competing for the ability for connections to both water and wastewater.

18. **The project area is located across the territorial boundary shared with Selwyn District Council (SDC), who is also a relevant local authority for this application. With this context, are there any cross-boundary jurisdiction matters that Christchurch City Council consider may affect the delivery of the project?**

The project will require agreement between CCC and Selwyn District Council ('SDC') in relation to the servicing of wastewater, water supply and stormwater and how these assets that span the jurisdiction boundary will be maintained. Consideration regarding how waste and/or recycling will be collected should be agreed between CCC and SDC. Agreement between CCC and SDC for development contributions, rates and potential cost recovery for servicing will be required. This will be dependent on the infrastructure arrangements as well as maintenance of assets.

In relation to cross-boundary stormwater discharge, it is unclear if the project will utilise the separate discharge consents held by CCC and SDC, or a new discharge consent sought. Stormwater cannot be discharged under the CCC global consent due to the stormwater pond being located outside the Christchurch City territorial boundary; thus the discharge would either need to be under any consent that is held by SDC or the project would need to apply for an operation stormwater discharge consent as part of the consents sought under FTAA. Mr Brian Norton, Senior Stormwater Planning Engineer for CCC details that under paragraph 45 of this memorandum that both CCC and SDC have different stormwater design standards for subdivisions; further information should be provided regarding this in any substantive application (should the referral application be granted)

19. **Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act)**

The proposal does not appear to include an ineligible activity as per Schedule 5.

20. **Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of the Act).**

The project is not considered to meet any of the reasons to decline the referral application under section 21(5) of the FTAA. The potential significant adverse effects on the environment under section 21(5)(c) of the FTAA is discussed further in paragraphs 43-51 of this memorandum, but the primary risk of adverse effects relate to the servicing of the site, given the significant constraint of infrastructure to service any out of sequence greenfield development, including the project in addition to the already planned residential area within Christchurch.

General Comments to Assist the Minister

Section 22(1)(a): Significant regional or national benefits

21. Section 22(1)(a) refers to significant regional or national benefits of the project, and Section 22(1)(b) considers whether referring the project to the fast-track approvals process would facilitate the project 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.

22. The whether the development will have national or regional benefits is not clear, nor is the extent of any such benefit. The economic report for the project has not been peer-reviewed by a relevant expert; but a high-level review of the information provided questions if all the relevant costs associated with the project have been captured (see comments under paragraph 44 regarding wastewater). CCC officers have significant concerns about servicing constraints and the identified capacity of the network to facilitate this out-of-sequence greenfield subdivision, in addition to the cumulative effect of other proposed referral applications. This includes availability of funding to provide required off-site upgrades. In relation to the quantification of the proposed benefits, CCC officers do not consider this cost has been appropriately addressed to provide a contextual analysis of the benefits of the project. However, no conclusion is drawn on the overall significant regional or national benefits of the project.
23. The comments provided pre-lodgement in relation to the benefits are also of relevance; these being:
 - 23.1. Whether any economic activity is generated by the developed, or represents a transfer of economic activity that would occur elsewhere, either within the region or nationally;
 - 23.2. Any reduction in available downstream infrastructure capacity for zoned land elsewhere in the district, including that enabled by Plan Change 14, enabling greater intensification of existing residential zoned land.
24. The project delivering an additional 350 houses may provide a benefit, but further details regarding all the costs associated with the project are needed to determine if the project will have any regional or national benefits that meet the threshold of 'significant', or if any such benefits would be more on the local level.

Section 22(1)(b): Timely and cost-effective

25. It is possible that the referral of the project will enable the relevant approvals / consents to be processed in a more timely and cost-effective way than under the normal processes. A single, unified assessment is expected to be more efficient subject to providing all the relevant information for a substantive decision; especially given the cross-boundary nature of the project.
26. It should be mentioned that a plan change would likely have been the avenue which the project would be sought outside of the FTAA. The procedural step of a plan change would not be required if approval is granted under the FTAA for the project; which would result in a timelier process.
27. No comment is proffered in relation to whether the project would materially affect the efficient operation of the fast-track approvals process.

Section 22(2): Considerations for benefits

28. Section 22(2) details matters which the Minister may consider when assessing a referral application. For efficiency, comment is only provided on the matters which are considered relevant.
29. The project will see the delivery of an increase of housing. Acknowledging the potential issues involving the servicing of unplanned greenfield development, it is unclear if the project will result in a well-functioning urban environment.
30. In terms of section 22(2)(a)(iii) of the FTAA, the project will result in an increase in the supply of housing, contributing to an additional 350 allotments for residential development, further information will be required as to how this increase in housing will be a regional or national benefit. While the project will contribute to an increase in the housing supply, the project will be unable to be serviced by reticulating wastewater without upgrades to the wastewater network and the Christchurch Wastewater Treatment Plant (see comments by under points 44). Noting this, the project will represent an out of sequence residential development with no planned infrastructure to support it, is not considered to contribute to a well-functioning urban environment. Without significant upgrades to the infrastructure, including that of the Christchurch Wastewater Treatment Plant, the project will see the degradation of the existing and planned urban environment enabled through Plan Change 14.
31. The preliminary economic assessment submitted with the referral application concludes that the project will have significant economic benefits and meet section 22(2)(a)(iv) of the FTAA. Given the limited timeframes provide comments on the project, no external expert economic input has been commissioned to review this report. It's noted that the report provided with the referral application provides an assessment against the provisions of 3.6 of the NPS-HPL (restricting urban rezoning of highly productive land); which is not considered to be of relevance to the project. Taking into account the comments provided below in relation to wastewater capacity and upgrades required; this should be reflected in a revised economic assessment.

32. In relation to section 22(2)(a)(v) of the FTAA, the project will see the residential development of LUC 1 and LUC 2 productive land and is not considered to support primary industries. The assessment provided against the provisions of the NPS-HPL are discussed further below.
33. In relation to section 22(2)(a)(x) of the FTAA, the project is inconsistent with the local and parts of the Canterbury Regional Policy Statement ('CRPS'). These are discussed further below.

Section 22(3) – 22(8): Other sections

34. CCC has no comments regarding these sections of the FTAA as they are not considered to be of relevance to the project.

Local and regional planning documents, including spatial strategies

35. The site is subject to the Christchurch District Plan ('CDP'), zoned Rural Urban Fringe and Open Space Water and Margins, and subject to a range of overlays, including:
- 35.1. Flood Management Area and High Flood Hazard Management Area;
 - 35.2. Liquefaction Management Area;
 - 35.3. Water Body Setback from Upstream and Downstream waterways
 - 35.4. Site of Ecological Significance (SES/LP/29 – Knights and Nottingham Streams)
36. As the site is zoned rural, it is not subject to wider spatial strategies seeking to coordinate and facilitate development over a wide area, inclusive of multiple property owners.
37. Progressing development on greenfield land that is not subject to area planning risks disjointed development, small and inefficient facilities, and potential for rework required to upgrade undersized infrastructure in future. Such development would be inconsistent with CDP Strategic Objectives 3.3.1 *Enabling recovery and facility the future enhancement of the district* and 3.3.8 *Urban growth, form and design*, which broadly seek to enable development in an integrated manner.
- 37.1. In addition to the above mentioned broad strategic direction in with CDP, the project will be inconsistent with the objectives and policies of the Rural Zone. The project is seeking a change in the character of the existing rural environment to being residential. Thus, being inconsistent with the objective sought within the rural environment which seeks to enhance the function, character and amenity values of the rural environment and seeks to avoid the creation of new sites less than 4ha; with the density of the project representing a significant deviation from these objectives and policies.¹
38. These provisions are consistent with other local and regional planning documents, in particular:
- 38.1. The Canterbury Regional Policy Statement ('CRPS'), which sets the resource management aspirations for the Canterbury Region, with Chapters 5 *Land-use and Infrastructure* and 6 *Recovery and rebuilding of Greater Christchurch* particularly relevant to land use and development. These chapters seek to enable land use and development in greenfield priority areas, as shown in Map A of Chapter 6, where well supported by infrastructure, including strategic connections.
- 38.2. This is further reenforced by the following:
- Policy 6.3.1 – Which seeks to ensure that new urban activities only occur within the existing urban area or areas identified in 'Map A';
 - Policy 6.3.3 – Which seeks to ensure that subdivisions must not proceed ahead of the incorporation of an outline development plan; and
 - Policy 6.3.5 – That land use development is integrated with infrastructure by identifying priority areas and forward planning infrastructure in these areas; which the project site sits outside of.

¹ Objective 17.2.1.1 and Policy 17.2.2.7

The provisions of Chapter 6 of the CRPS largely seeks to ensure that sufficient housing capacity is provided within Greater Christchurch by identifying future development areas and greenfield priority areas and ensuring that development occurs within these areas. This allowing for the expansion of Christchurch in a planned way with sufficient infrastructure to facilitate greenfield development. The project is located outside of the existing urban area, Greenfield Priority Area or Future Development Area as identified in Map A of the CRPS. It should be noted that Canterbury Regional Council ('CRC') will also provide comments regarding the CRPS.

- 38.3. Included as Appendix 2 is a memorandum by Ms Helaina Gregg, Principal Advisor Policy at CCC, which provides strategic planning and policy advice on the consideration of greenfield Fast Track referrals having regard to the Greater Christchurch Spatial Plan² (GCSP) and the current Housing Capacity Assessment for Christchurch. That appendix should be read in conjunction with this memorandum. In summary, the project is not considered to be consistent with the GCSP given the ad-hoc and uncoordinated manner of development, which is proposed, and which fails to appropriately consider the ability to provide and fund necessary infrastructure. Furthermore, Christchurch currently has sufficient development capacity to meet housing demand over the next 30 years, and therefore there is no immediate capacity shortfall that the project would be required to address. Furthermore, it is not considered that approval of this application would be effective in improving market competitiveness, given the significant current infrastructure capacity constraints.
39. Overall, the project is not considered to be consistent with the Greater Christchurch Spatial Plan, Canterbury Regional Policy Statement, or the Christchurch District Plan.

National Policy Statement for Highly Productive Land

40. The project site is zoned as Rural Urban Fringe. While acknowledging the panels decision in the Pound Road fast-track decision³, for the purpose of consideration of the NPS-HPL, the Rural Urban Fringe Zone is the nearest equivalent zone to the General Rural Zone, and therefore the NPS-HPL is a relevant consideration. This was the conclusion reached in the Ryan's Road fast-track decision.⁴ The application includes an assessment of the project against the NPS-HPL by The AgriBusiness Group. Specifically, this assessment notes that the application is predominantly categorised LUC1 and some LUC2, and therefore 3.10 of the NPS-HPL is relevant.
41. No peer review of this assessment by an agricultural specialist has been undertaken and anticipates that if a substantive application is made, this matter will be addressed further, but considers there are deficiencies in the assessment which render determination of compliance with clause 3.10 of the NPS-HPL unclear. These include the following non-exhaustive matters:
- 41.1. The assessment considers the scale of the site as a constraint, when sub-clause 4 of 3.10 specifically states that the size of a landholding is not of itself a determinant of a permanent or long-term constraint. The assessment appears to have assessed each individual title and determined their size is a constraint, rather than the entire project site as a whole.
- 41.2. The Agribusiness report does not address the cumulative loss of HPL, specifically the loss of the minimal rural HPL that is present within Christchurch which has seen incremental loss from urban development over time. The report also makes broad gross figures of the total of HPL land and does not consider the zoning of the land and exclusions as defined under the NPS-HPL.
- 41.3. The assessment does not sufficiently address the ability for any identified constraint to be addressed through any reasonably practicable options, including consideration of alternate forms of land-based primary production, alternative production strategies, reallocation or transfer of water, and boundary adjustments.
42. Based on the above, further information is required to determine if the project is consistent with the NPS-HPL.

Water supply

² <https://www.greaterchristchurch.org.nz/assets/Documents/Work-Programme/Greater-Christchurch-Spatial-Plan/Greater-Christchurch-Spatial-Plan-2024.pdf>

³ 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.

⁴ Ryans Road Industrial Development [STAA-2504-1054] - Record of Decision of the Expert Consenting Panel under Section 87 of the Fast-Track Approvals Act 2024, Dated 7 May 2026.

43. Comments on water servicing were provided in the memorandum at pre-lodgement stage. The applicant has provided an infrastructure report and concept servicing plans addressing connections to and potential upgrades required for the provision of water supply to the site, which have been reviewed by Ms Michele McDonald, Team Leader Asset Planning Water and Wastewater. Ms McDonalds comments from the memorandum provided at pre-lodgement remain relevant.

Wastewater

44. With regard to the availability of connections to and potential upgrades required for the management of wastewater from the site Ms Michele McDonald, Team Leader Asset Planning Water and Wastewater, has noted:

- 44.1. While the application proposes that the development should be serviced by a Local Pressure Sewer System (LPSS), there is insufficient capacity available within the immediate downstream CCC wastewater network to accommodate the additional demand. The downstream infrastructure has been designed to service only the currently zoned Residential New Neighbourhood development areas. Consequently, available network capacity must be retained to service those developments.
- 44.2. Although the applicant's Infrastructure Report identified an Average Sewage Flow (ASF) of only 2.39 L/s, wastewater infrastructure must be sized to accommodate peak flow conditions rather than average demand. For an LPSS, peak demand is directly related to number of connected pumping units and must also account for operational scenarios where the system's 24-hour storage capacity has been exhausted, such as during extended rainfall events or prolonged power outages.
- 44.3. For a local pressure local pressure sewer network servicing up to 350 dwellings, the estimated daily peak demand would be at least 4.3 L/s. However, sufficient downstream capacity must also be available to receive stored wastewater once on-site storage capacity has been reached. Based on comparable catchments, this could result in peak discharges in the order of 15- 25 L/s, allowing for approximately 10% of the on-site pumps to operate simultaneously. If adequate downstream is not available to accommodate these flows, wastewater overflows and on-site spillage may occur.
- 44.4. As advised to the applicant in pre-lodgement stage, significant downstream network upgrades would be required to service the additional wastewater demand generated by this development. Based on the findings of the recent city-wide wastewater network optimisation, the following upgrades would be triggered:
- Upgrade of the DN225 sewer in Sabys Road and O'Halloran Drive.
 - Upgrade of the Pump Station 61 (PS61) on O'Halloran Drive, including its 1.1-kilometre rising main.
 - Upgrade of Pump Station 60 (PS60) Halswell, together with its 3.9 km rising main. This station has recently been upgraded to its maximum practicable capacity.
- 44.5. The capital cost of the above upgrades is estimated to be approximately \$20 million. As these upgrades will only be required only if additional land were zoned for development, no provision has been made for them within Council's Long-Term Plan or Development Contribution Policy.
- 44.6. Christchurch operates a centralised wastewater network, with wastewater conveyed through a series of pump stations and trunk sewers to the central Christchurch Wastewater Treatment Plant (CWTP) at Bromley on the eastern side of the city.

In addition to the immediate downstream capacity constraints, the city-wide wastewater system optimisation completed in June 2026 confirmed that the Christchurch Wastewater Treatment Plant (CWTP), together with the trunk sewer network and terminal pump stations that convey wastewater to the plant, does not have sufficient capacity to support additional greenfield development beyond that already provided for within the District Plan.

- 44.7. Given that no foreseeable wastewater servicing solution exists for the proposed development, the project is not supported. The CCC wastewater network does not have sufficient capacity to service the additional demand generated by the application, and the upgrades necessary to accommodate that demand are neither planned nor funded. In addition, any further greenfield development would place additional pressure on the wider wastewater system, including the trunk sewer network, terminal pump stations, and the Christchurch Wastewater Treatment Plant. Consequently, an alternative wastewater servicing solution that does not discharge to the CCC wastewater network will be required.

Stormwater

45. With regard to stormwater Brian Norton, Senior Stormwater Planning Engineer at the Council, has reviewed the application and provided the following comments:
- 45.1. As this project is proposing overlapping infrastructure in two separate stormwater rating districts, there are a number of potential issues that need consideration:
- We are unsure of the comparability of design standards used for stormwater mitigation in SDC compared with CCC. For example, CCC design their subdivision stormwater for the 2% AEP (1 in 50 ARI), whereas SDC looks at the 1% AEP (1 in 100-year ARI).
 - Who will ultimately manage the costs and responsibilities associated with operations and maintenance of the development infrastructure if the amalgamation of councils SDC with CCC doesn't occur?
 - Which district's consents cover the discharge from this facility?
 - It is noted that the current report outlines the development using CCC design standards for this subdivision.
- 45.2. More information is required to understand how untreated stormwater will be taken from the CCC side of Halswell River to the SDC side into the Stormwater Management Area (SMA) This is likely to be a significant flowrate of water as it will also include partially treated stormwater from the Creamery Ponds first flush basin. An engineering concept for the conveyance of stormwater should be provided at the referral stage to demonstrate feasibility and constructability. One recommended solution would be for separate SMAs to be located on either side of Knight's stream, as this would alleviate the CCC/SDC compatibility issues listed in the above bullet point as well.
- 45.3. CCC expectations for stormwater mitigation will be a first flush (dry) basin followed by a stormwater wetland with a separate detention basin to achieve Full Flood Attenuation for a 2% AEP (1 in 50-year ARI), 60-hour storm (the critical duration for Halswell River). Full flood attenuation is capture of the full 2% AEP (1 in 50-year ARI), 60-hour storm with slow release over 96 hours. I also note that the SMA here will need to include 101 Sabys Road and the wetland to be constructed here must be sized for secondary treatment of the Creamery Ponds FF basin.

Transport

46. With regard to the existing transport environment and potential effects of a residential development of this scale, Mr David McCormick, Transport Network Planner at Council has advised:
- 46.1. The traffic effects of the fast track should be undertaken in a comprehensive, area wide basis to assist in identifying the full demands and potential need for planned upgrades of the transport infrastructure. There is also a need to apportion the costs of any infrastructure upgrades to such growth projects. It's noted that reference is made to the existing, consented neighbouring site at 101 Sabys Road. However, in addition to 101 Sabys and there is a concurrent proposed fast track application at John Paterson Drive and Inverbrae Park Limited (off Sabys Road). Council is also aware of existing Fast track applications within Selwyn District (Valway Estate, Prebbleton), which will need to be considered as part of the assessment. For the enabling of planning of infrastructure required to support growth it is suggested that any subsequent further assessment of effects captures the cumulative effect of consented development plus future development that is reasonably anticipated.
- 46.2. While the information provided demonstrates how the site, through the extension of an existing bus route, can be made accessible by public transport. CCC officers maintain our initial comments on this subject with regards to the uncertainty of existing services which are low priority services within ECan service network. We maintain that Public Transport accessibility and passenger infrastructure should be addressed as a key early component of this fast-track project.
- 46.3. Modelling of the wider network: The original comments provided pre-lodgement regarding the wider network constrains remain and that any detailed assessment of the project should extend to the infrastructure previously identified in CCC correspondence as well the Halswell Road, Lincoln Road corridor which was highlighted in the high-level Transport Assessment as congested. Noting that the Council improvements mentioned in the Transport Assessment relate to road space reallocation for PT services as a method for the management of growth in the Southwest area of the city. This Public Transport improvement project further highlights the requirement of the fast-track site to be fully accessible by public transport from the outset.

- 46.4. Infrastructure Report - design information has been provided which includes some inconsistencies to the requirements of Christchurch District Plan. We advise that all infrastructure to be provided shall be subject to Council's engineering approvals process and as a default position comply with District Plan and Infrastructure Design standards.

Urban design and integration

47. Comments on urban design and integration were provided in the memorandum at the pre-lodgement stage of the project. The comments provided by Mr David Hattam in that memorandum remain relevant.

Reserves and open space

48. With regard to the provision of parks and open space in new residential subdivisions generally, Mr Peter Barnes, Senior Parks and Policy Planner at Council provided comments at the pre-lodgement stage which remain relevant; but also provided the following additional comments:
- 48.1. The proposed subdivision provides one Neighbourhood Park of 2236m². The Parks Unit considers for this to be an undersized Neighbourhood Park for the surrounding community; it is necessary to be at least 3000m².
- 48.2. Neighbourhood Parks provide a range of opportunities for the community close to home, including open space, green landscapes and trees, meeting places, children's play space and recreation opportunities for all ages. Neighbourhood Parks are dedicated recreation parks, that provide recreation opportunities that utility reserves and esplanade reserves cannot. The Council has committed to parks provision through policy that provides levels of service. The Parks and Foreshore Activity Plan states the Level of Service for Neighbourhood Parks as 80% of urban residential properties are located within 500m of a park (excluding utility reserves) that is at least 3000m². In addition, Neighbourhood Parks are provided in urban areas at a rate of at least 1.9ha/1000 population.
- 48.3. The Neighbourhood Park location can be located in the proposed location (adjacent to the Halswell River) if assessment of land stability and drainage matters are positive and show that a Neighbourhood Park can be successfully developed in that location. Alternatively, other locations close by will need to be considered.

Waterways

49. With regard to waterway ecology, Mr Christopher Watt, Waterway Ecologist at Council has advised:
- 49.1. Overall, I have no comments or issues to raise at this stage. Ecological matters have been recognised in Attachment 7-Ecological Constraints Assessment informing the direction of considerations and next steps for the applicant. Furthermore, preliminary conceptual plans outline waterway enhancements will be included which satisfies policy on Water Body Setbacks.
- 49.2. Preliminary support is based on the concept-level waterways enhancement information provided to date, and that confirmation of support is subject to review of the detailed design, management plans, planting schedules, hydraulic assessments, and proposed consent conditions when the substantive application is lodged. Once high-level plans have been submitted, the opportunity to comment then would be welcomed.

Earthworks & Geotechnical

50. Ms Yvonne McDonald, Council Senior Subdivisions Engineer, has reviewed the supporting geotechnical report and has commented that there are no earthworks information provided with the referral application.
- 50.1. In relation to geotechnical matters, Ms McDonald notes that the density of tests undertaken by KGA for the project site in the report is sparse and would advise more tests to be undertaken to more closely align with the standard density of 90 for subdivisions of this size. Ms McDonald also advised that groundwater is shallow in the project site, sitting around 1m in depth and that the KGA report concludes that the ground conditions are comparable to that of TC2 land.
- 50.2. Ms McDonald advised that further investigation would be required to assess lateral spread risk and that KGA have not provided a Statement of Professional Opinion or have addressed the National Policy Statement for Natural Hazards; which should be provided with any substantive application should the referral application be accepted.

Contamination

51. The supporting Preliminary Site Investigation has been reviewed by Ms Kirsten Rayne, Council Senior Environmental Health Officer. A Detailed Site Investigation is anticipated with any substantive application, but Ms Rayne considers contamination can be appropriately managed in any future development.

Funding of infrastructure upgrades and connections to CCC infrastructure

52. As detailed above, servicing of the proposed development represents a substantial challenge given identified network constraints. Out of sequence development undermines the strategic and phased approach to planning and creates inefficiencies in infrastructure delivery by diverting funding from planned development. This matter has been further addressed in the memo included as Appendix 2 to this letter, and which should be read in conjunction with this response.
53. The Applicant will need to demonstrate how the upgrades to infrastructure can be achieved such that the development can be appropriately serviced, including both the connections to outfalls and downstream infrastructure where capacity is constrained. If unresolved and unfunded, CCC may refuse (under CCC bylaws⁵) any request for infrastructure connections until adequate capacity exists.

Vincent Ashman
Senior Planner

Authorised by:



Paul Lowe
Manager Resource Consents

⁵ In particular, the **Water Supply and Wastewater Bylaw 2022** and **Stormwater and Land Drainage Bylaw 2022**.

Appendix 1 – CCC Pre-lodgement comments

14 May 2026

Sabys 101 Limited
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By email: s 9(2)(a)

Fast-track Approvals Act 2024 – Notification of Intent to Lodge Referral Application

Sabys 101 Limited – Franco Farms Development

1. The Christchurch City Council (CCC) received a notification from Sabys 101 Limited advising of their intention to lodge a referral application under section 13 of the Fast-track Approvals Act 2024 (FTAA) to subdivide and use land for residential development.
2. The purpose of this memorandum is to respond to this notification under FTAA section 11(1)(c), and identify matters that the applicant may want to consider prior to lodging a referral application.

Prior Council engagement

3. CCC Officers and representatives of the applicant have previously met to discuss potential development of the site and means through which this development could be facilitated, however no detailed proposal has previously been circulated to the CCC for comment.

Information provided

4. The information provided with the notification is attached as Appendix 1, being:
 - 4.1. A description of the proposal;
 - 4.2. A draft and tentative scheme plan.
5. For clarity, it is noted that the following have not been provided:
 - 5.1. Any information detailing the national or regional benefits anticipated;
 - 5.2. Any information detailing how the project would be facilitated by a referral to the fast-track approvals process;
 - 5.3. The number and nature of approvals required and sought under the Resource Management Act 1991;
 - 5.4. The anticipated commencement and completion dates of work;
 - 5.5. Whether the project is proposed to be staged;
 - 5.6. Any anticipated and known adverse effects of the proposal;
 - 5.7. Any concept stage plans for infrastructure necessary to service the development.

Scope of comments

6. Noting the level of detail provided with the application the scope of comments provided in the memorandum and is of a general nature and not exhaustive.

7. In particular, it is considered that insufficient information has been provided to enable comment in relation to:
 - 7.1. Earthworks;
 - 7.2. Geotechnical matters;
 - 7.3. Infrastructure design within the subdivision area;
 - 7.4. Natural hazards;
 - 7.5. Natural heritage, indigenous biodiversity and ecosystems;
 - 7.6. Use of Highly Productive Land;
 - 7.7. Waterway values.
8. Information to assess and consider these matters is anticipated to be provided at substantive stage, should the application for referral be accepted.

Site and area context

9. The site has been identified as Lots 2-3 DP 58573, Lots 2-3 DP 68573 (having the address 101 Sabys Road), and 6 Wroots Road (being legally described as Part Lot 1 DP 1537, within Selwyn District). It appears that the reference to Lots 2-3 DP 58573 may be in error, as no allotment with that legal description is apparent in Canterbury.
10. While identified as forming part of the proposed development area, Lot 2 DP68573 is zoned Residential New Neighbourhood, and a subdivision consent, RMA/2025/2041, has been granted for the creation of 206 residential allotments. An area in which residential units are proposed in this development is required for the stormwater management facility of RMA/2025/2041. Any arrangements to ensure that development will continue to be appropriately serviced in terms of stormwater management should be provided alongside the referral application, including whether an amendment to RMA/2025/2041 is required.

Local and regional planning documents, including spatial strategies

11. Where the site falls in the Selwyn District, it is zoned Inner Plains under the Operative Selwyn District Plan and General Rural Zone under the Partially Operative Selwyn District Plan. Comment on any overlays and zoning implications should be sought from the Selwyn District Council (SDC).
12. The remaining parts of the site within Christchurch District are subject to the Christchurch District Plan, and zoned Rural Urban Fringe and Open Space Water and Margins, and subject to a range of overlays, including:
 - 12.1. Flood Management Area and High Flood Hazard Management Area;
 - 12.2. Liquefaction Management Area;
 - 12.3. Water Body Setback from Upstream and Downstream waterways;
 - 12.4. Site of Ecological Significance (SES/LP/29 – Knights and Nottingham Streams).
13. As the site is zoned rural, it is not subject to wider spatial strategies seeking to coordinate and facilitate development over a wide area, inclusive of multiple property owners.
14. Progressing development on greenfield land that is not subject to area planning risks disjointed development, small and inefficient facilities, and potential for rework required to upgrade undersized infrastructure in future. Such development would be inconsistent with Christchurch District Plan (CDP) Strategic Objectives 3.3.1 *Enabling recovery and facility the future enhancement of the district* and 3.3.8 *Urban growth, form and design*, which broadly seek to enable development in an integrated manner.
15. These provisions are consistent with other local and regional planning documents, in particular:
 - 15.1. The Canterbury Regional Policy Statement (CRPS), which sets the resource management aspirations for the Canterbury Region, with Chapters 5 *Land-use and Infrastructure* and 6 *Recovery and rebuilding of Greater*

Christchurch particularly relevant to land use and development. These chapters seek to enable land use and development in greenfield priority areas, as shown in Map A of Chapter 6, where well supported by infrastructure, including strategic connections.

- 15.2. The Greater Christchurch Spatial Plan¹ (GCSP), which has been adopted by CCC and SDC as the Future Development Strategy under the National Policy Statement on Urban Development 2020, to inform the broad locations in which development is anticipated to inform requirements for development and other infrastructure, and transport corridors. The GCSP identifies areas in which greenfield development is anticipated, as shown in Map 14. The GCSP acknowledges additional greenfield development may be required outside priority areas where a Housing and Business Capacity Assessment identifies a need for development, and the development is well integrated with existing urban areas.
16. The applicant should demonstrate the extent to which the development is consistent with the relevant provisions of these documents when the referral application is lodged.

Infrastructure and servicing constraints

Water supply

17. With regard to the availability of connections to and potential upgrades required for the provision of water supply to the site, Michelle McDonald, Team Leader Asset Planning Water and Wastewater, has noted:
 - 17.1. Christchurch operates a decentralised groundwater-based water supply system. To achieve cost-effective compliance with the Drinking Water Quality Assurance Rules, Christchurch City Council seeks to minimise the need for additional pump stations and treatment plants, while working within the constraints of the existing piped network.
 - 17.2. The proposed Candys and Sabys Block is adjacent to the West Water Supply Zone (WSZ). The nearest pump station and treatment plant is PS1102 Dunbars WS that is supported by the Sutherlands 1 reservoir.
 - 17.3. The Three Waters Unit has assessed the capacity of the city's water supply against 50-year growth projections and identified a need for additional supply capacity in the West WSZ. Capacity increases at existing pump station and treatment sites within the West WSZ can be achieved by adding new groundwater wells. The Water Supply Rezoning Master Plan also calls for additional storage at the Sutherlands 1 Reservoir Site.
 - 17.4. A new connection to the existing water supply network will require careful planning and likely involve upgrades to existing water mains ahead of their planned renewal schedule.

Wastewater

18. With regard to the availability of connections to and potential upgrades required for the management of wastewater from the site Ms McDonald has noted:
 - 18.1. Christchurch city operates a central wastewater network with wastewater conveyed through a series of pump stations and trunk sewers to the central Christchurch Wastewater Treatment Plant located at Bromley on the eastern edge of the city.
 - 18.2. The Three Waters Unit has commenced a review of the city-wide wastewater master plan in response to updated growth projections that the city could grow by 67,000 residential units over a 50-year planning horizon to support a population of approximately 550,000. Most of the projected growth is expected to be accommodated through urban intensification, with an expected 25% considered for greenfield development.
 - 18.3. Hydraulic modelling of the projected 50-year wastewater demand identifies multiple network deficiencies, including within key trunk sewers and terminal pump stations. As a result, future spatial planning will have to consider decentralized wastewater networks with separate wastewater treatment plants rather than reliance on capacity being available to convey wastewater to the central Christchurch Wastewater Treatment Plant. To avoid major infrastructure upgrades that would be needed to accommodate the 50-year demand, projected growth would need to be reduced by approximately 20,000 residential units. This aligns with the growth portion allocated

¹ <https://www.greaterchristchurch.org.nz/assets/Documents/Work-Programme/Greater-Christchurch-Spatial-Plan/Greater-Christchurch-Spatial-Plan-2024.pdf>

to greenfield development and is consistent with the fact that infrastructure was designed to service the current zoned city boundaries.

- 18.4. The wastewater network downstream from the proposed Candys & Sabys Block has capacity only to service the existing Southwest Halswell zoned land and to continue meeting the agreement with Selwyn District Council to accept flows of up to 7.5 L/s from Tai Tapu.
- 18.5. Increasing capacity to service additional development would require significant infrastructure upgrades, including:
- Upgrades to the Sabys and O'Halloran Drive sewer, that would trigger;
 - An upgrade of the 90 L/s PS61 O'Halloran Drive pump station and its 1.1-kilometre rising main; that would trigger
 - An upgrade of the 200 L/s PS60 Halswell pump station (recently upgraded to its maximum capacity) and its 3.9-kilometre rising main; that would trigger;
 - An upgrade of the 400 L/s PS105 Wigram pump station and its 1.9 kilometre rising main.

These upgrades would also result in the need for further upgrades to major trunk sewers and terminal pump stations.

- 18.6. Servicing the proposed development as a local pressure sewer network has been considered but will not sufficiently address downstream capacity constraints as sufficient capacity must be available to accept wastewater from the full local pressure sewer network (including Southwest Halswell) following an extended rainfall event. Adequate capacity is therefore required to enable wastewater discharge once the 24-hour on-property storage limit of individual pump units have been reached.

Stormwater

19. With regard to stormwater Brian Norton, Senior Stormwater Planning Engineer at the Council, has reviewed the information provided and advised the location of the stormwater management facility as shown is not fundamentally opposed, however there are several uncertainties around the establishment and operation of the facility, in particular:
- 19.1. The stormwater management facility as shown is located within Selwyn District, and it is unclear what is proposed in terms of the ownership and operation of this facility.
- 19.2. While CCC holds a global consent for discharge of stormwater within the Christchurch District, any discharges within Selwyn would not be provided for in this consent, and a separate discharge consent would be required. Such a consent could be sought and considered within the Fast-track process.
- 19.3. A significant quantity of stormwater generated within the overall development would need to be conveyed over or under Knights Stream, and it is not clear how this would be achieved. An engineering concept for the conveyance of this stormwater should be provided at referral stage to demonstrate the development could be serviced in terms of stormwater management, or an alternative stormwater management arrangement proposed.

Transport

20. With regard to the existing transport environment and potential effects of a residential development of this scale, Andrew Milne, Team Leader Asset Planning Transport has advised:
- 20.1. From a public transport serviceability perspective, Christchurch Infrastructure Design Standards require not less than 90% of dwellings to be within 500m from a proposed bus route. The Site sits wholly outside of its nearest bus route, 100, which is a lower frequency route with an expected 400m catchment. Environment Canterbury are currently undertaking a route review. However, at this time there is no certainty that the 100 service will be continued or changed as a result of the review, and it is unclear the degree to which the Site would be serviced by public transport into the future.
- 20.2. Current-state operation of the road network has been assessed using Christchurch Assignment and Simulation Traffic (CAST) Model, using 2023 base model scenario.

- 20.3. The existing transport network surrounding the proposed Site currently operates with relatively moderate constraints and does not indicate immediate or significant localised infrastructure deficiencies during the morning and evening peak periods.
- 20.4. However, the CAST outputs also demonstrate that at the wider strategic network, particularly NZTA Christchurch Southern Motorway (CSM) off-ramp and Springs Road approaches, are already sensitive to incremental increases in traffic demand due to the constrained operating conditions observed at key downstream intersections and CSM off-ramp connections.
- 20.5. It is likely that some traffic attributable to the development would add pressure to Christchurch Southern Motorway off-ramp and Springs Road approaches.
- 20.6. The CAST base model indicates that the existing road corridors associated with Springs Road, Halswell Junction Road, and the Christchurch Southern Motorway off-ramp are currently operating close to their practical capacity, with only limited remaining storage and operational capacity available to accommodate additional development-related traffic demand.
- 20.7. At the moment, traffic signals operating on the Halswell Junction Road approach during peak periods are used to manage and discharge traffic into the Halswell Junction Road / Springs Road roundabout at controlled intervals. This arrangement creates short traffic gaps that allow vehicles travelling from Selwyn District along Springs Road to access the roundabout.
- 20.8. However, the outputs from CAST base model suggests that the existing traffic demand is pushing near its practical limit, with various approaches operating above 90% capacity and any further increase in traffic demand may lead to further congestion and potential spillback effects on downstream road links and motorway ramp infrastructure.
- 20.9. Overall, based on the findings of the CAST base model, it is strongly recommended that any future development generating a significant increases in traffic demand, should be subject to careful and comprehensive transport assessment, given the existing operational constraints and limited remaining capacity of the surrounding transport network infrastructure and that any necessary infrastructure upgrades are appropriately addressed by the developer.

Urban design and integration

21. With regard to urban design and integration with existing urban areas, David Hattam, Senior Urban Designer at the Council has reviewed the information provided and noted:
 - 21.1. The provisions of the Residential New Neighbourhood Zone (RNN) are well suited to greenfield development, having been successful in providing for connectivity and a generally good standard of amenity and liveability in new subdivisions. Conditions enabling development in accordance with these provisions would likely be supported by CCC. In terms of the provisions applying within the RNN, the draft and tentative scheme plan demonstrates:
 - 21.1.1. There are a range of lot sizes to provide for housing choice;
 - 21.1.2. There is a connected movement network with small block sizes and good connections and walkability;
 - 21.1.3. There is not an over-reliance on rear sections and rights of way for access;
 - 21.1.4. The proposal does comply with the requirement for an 800m walkable block size.
 - 21.2. The proposal includes land for commercial use (approx. 1000m²) on Candy's Road. This would provide small scale local facilities for the subdivision and also any further development across the road (and would also benefit from passing trade as Candys Road leads to SH75). It would have a walkable catchment within the subdivision and the wider area (which lacks much in the way of retail). This change of use appears to be appropriate.
 - 21.3. A weakness of the scheme (or missing information) is that we do not know if there is to be a bridge over the stream. A pedestrian connection across the river within the main reserve would be beneficial and would complete the 800m walkable grid into Selwyn.
 - 21.4. In terms of the matters listed under 8.8.9:

- 21.4.1. Integration, Context and Placemaking: Integration with the streams is the most obvious issue. Houses are to back onto the stream on both sides, except at the park. This means there will be transparent fencing close to paths people walk near to, which is an awkward interface because it compromises privacy for residents, but it needed to avoid creating an unobserved space where antisocial behaviour can occur. Knights Stream and Nottingham Stream is part of a recreation network (identified in the South West Area Plan) and provides a useful and high amenity pathway, for instance between Knights Stream and Halswell Quarry Park. It would be an improvement for some of the river to be open to the street on one side, to create a safer and more accessible network. This would require re-arranging the streets on the proposal and may lead to an increased use of rear lots as a quid-pro-quo.
- 21.4.2. Subdivision Design: There would be a diversity of housing provided for although no comprehensive housing. It would be worth considering some alternative typologies (eg duplex lots) as these are popular elsewhere in Halswell. Corner sites are not really emphasised. There is more higher-density at the east of the site than elsewhere, which makes sense because it is accessible. There is overall a high level of amenity which will complement higher density, and these may help support the proposed retail and be somewhat handy for public transport which would be expected on Candy's Road or Sabys Road.
- 21.4.3. Movement Networks: Note my comments on the accessibility of the river walkways. Otherwise the streets are very narrow (12.5m) which is not usually wide enough to provide for a carriageway, parking, footpaths, trees etc. Whilst this may be acceptable for some streets, it is not appropriate as a more widespread network. In particular it is unlikely to provide for footpaths on both sides or for many trees. The central spine road would act as a local collector and is only 14m which is not enough for this purpose.
- 21.4.4. Public Spaces: there is a good variety of spaces (river, stormwater and parks).
- 21.5. The proposal could meet some of the outcomes anticipated by the District Plan within the RNN. This includes the provision of a small commercial centre (from a design perspective). In many ways the proposal is well designed, with a connected road network and a variety of lot sizes. This indicates that a development of this type could be appropriate here. However, there are two fundamental concerns with the layout proposed:
- 21.5.1. The waterways do not have enough prominence and oversight because houses back onto them throughout.
- 21.5.2. The streets are too narrow.
- 21.6. Addressing these concerns will likely require a redesign of the scheme.

Reserves and open space

22. With regard to the provision of parks and open space in new residential subdivisions generally, Peter Barnes, Senior Parks and Policy Planner at the Council has noted:
- 22.1. The Council has committed to parks provision through the Parks Activity Plan, Public Open Space Strategy 2010 and District Plan ODPs.
- 22.2. The Council vision is to provide, develop and maintain a publicly accessible network of open space. The Parks Activity Plan and POSS provides Open Space guidelines and Levels of Service. These are important so the Council provides a consistent network of parks city wide, for the community to utilise and enjoy.
- 22.3. Neighbourhood Parks (of 3000m² or greater) (but not a stormwater reserve) provide a range of opportunities for the community, including open space, green landscapes, meeting places, children's play space and passive recreation. If an adequate number of Neighbourhood Parks are not provided, the community will have to travel significant distances to visit parks in other areas.
- 22.4. Public open space is becoming increasingly important to support community wellbeing as private open space shrinks.
- 22.5. The Parks Activity Plan states the Level of Service for Neighbourhood Parks (or indeed other parks, except for Utility Reserves) is a 3000m² park located within 500m of 80% of residential lots. In addition, Neighbourhood Parks are provided in urban areas at a rate of at least 1.9ha/1000 population.
23. More specifically, with regard to the provision of reserves within the Site, Mr Barnes has noted:

23.1. "Reserve 2236m²" is a small reserve, and the site will not be able to provide meaningful open space provision for the surrounding residential area. This reserve should be boosted to 3000m², or greater.

23.2. Significant 'Riparian Margins' are proposed. These can be assets to the community, providing recreation and access to the water, and protect ecological habitat. They can also be extremely costly to establish and maintain.

Funding of infrastructure upgrades and connections to CCC infrastructure

24. Out of sequence development undermines the strategic and phased approach to planning and creates inefficiencies in infrastructure delivery by diverting funding from planned development. This proposal represents such out-of-sequence development. CCC's position is that infrastructure planning and investment needs to occur at a broader scale to achieve efficiencies and effectiveness of infrastructure provision. As this planning has not yet been undertaken for this area, any development at this stage would be ad hoc and may lock CCC into less optimal infrastructure outcomes.
25. In the case of this development, infrastructure upgrades will be required to enable the development to connect to the wider urban network, particularly in relation to wastewater services. Beyond the capital investment needed to upgrade this infrastructure, ongoing operational expenses will be required for maintenance and service delivery. These costs will largely be borne by the CCC.
26. The current Long-Term Plan makes no provision for either capital or operational expenditure in this area, and these costs are not reflected in the development contributions currently levied. Any decision by CCC to amend these plans to provide infrastructure for this development would require reprioritisation, potentially displacing planned investment in other areas of Christchurch.
27. As the infrastructure required to provide capacity to service this development is not in the current Long-Term Plan or Development Contributions Policy, the CCC has no funding available to provide the infrastructure upgrades. Greenfield development impacts downstream capacity in the wastewater network, if this development was aligned with CCC's area planning, the developer would be required to fund to their share of the cost to provide the infrastructure upgrades with the rest spread over a wider area which the CCC would then recover via development contributions.
28. To address this funding gap identified, the Applicant will need to demonstrate how the upgrades to infrastructure can be achieved such that the development can be appropriately serviced, including both the connections to outfalls and downstream infrastructure where capacity is constraint. If unresolved and unfunded, CCC may refuse (under CCC bylaws²) any request for infrastructure connections until adequate capacity exists.

Benefits

29. The whether the development will have national or regional benefits is not clear, nor is the extent of any such benefit. The quantification of benefits should consider:
 - 29.1. Whether any economic activity is generated by the development, or represents a transfer of economic activity that would occur elsewhere, either within the region or nationally;
 - 29.2. Any reduction in available downstream infrastructure capacity for zoned land elsewhere in the District, including that enabled by Plan Change 14, enabling greater intensification of existing residential zoned land.

Conclusion

30. It is recommended that the proponent consider and respond to these matters identified above in any referral application. Pre-application meeting processes are available should further input from CCC be sought prior to the referral application being lodged, subject to staff availability.

Francis White
Senior Planner

² In particular, the **Water Supply and Wastewater Bylaw 2022** and **Stormwater and Land Drainage Bylaw 2022**.

Authorised by:

A handwritten signature in blue ink, appearing to be 'PL', with a large loop at the top and a horizontal stroke at the bottom.

Paul Lowe
Manager Resource Consents

Appendix 1 – Information provided with notification

From: Kerstin Ghisel s 9(2)(a)
Sent: Wednesday, 15 April 2026 4:06 pm
To: Resource Consent applications; Lightbody, Kirk; Ward, Sean
Subject: Sabys 101 Limited and lodgement of a Referral Application
Attachments: SabysCandyBlock_Lot_Plans_24.03.2026.pdf

Hello,

Sabys 101 Limited wishes to formally notify the Christchurch City Council that Sabys 101 Limited will be lodging a referral application under the Fast-track Approvals Act 2024 ("FTAA") for the Franco Farms development ("the Project"). The Project will establish:

- approximately 348 residential lots and associated residential units.
- A neighbourhood centre (approximately 2,115m²) 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.
- The proposal incorporates 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 (approximately 2,236m²) and stormwater basins with associated wetland areas (approximately 5.6ha) to the south of the application site.
- Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure.

Sabys 101 considers that the Project is a development project that would have significant regional benefits, and that referring the project into the FTAA regime will facilitate the project and is unlikely to materially affect the efficient operation of the approvals process, and is clearly aligned with section 22(1) of the FTAA.

As you are aware, Sabys 101 Limited has already commenced consultation with Christchurch City Council for this Project, including attending meetings with council staff in December 2025 and February 2026 to discuss the proposal, along with various email correspondence. We thank you for your time in participating in these sessions

Approvals

A referral application must specify all the approvals that are proposed to be applied for under the fast-track approvals process under the FTAA. The following approvals will be required:

- Schedule 5 approvals relating to the Resource Management Act 1991 ("the RMA"); and
- Schedule 7 approvals relating to the Wildlife Act 1953 ("Wildlife Act")
- Schedule 8 approvals relating to Heritage New Zealand Pouhere Taonga Act 2014 ("HNZ Act")

Of particular relevance to Christchurch City Council are the approvals required under the FTAA that would otherwise be required under the RMA.

The FTAA as amended on 31 March 2026 requires the following prior to lodging a referral application with the EPA:

- Consultation requirements in section 11(1)(a), which are not relevant to the Project; and
- Written notification to (relevantly) the relevant local authorities, any relevant iwi authorities, hapū, and Treaty settlement entities, and the relevant administering agencies.

In accordance with section 11 of the FTAA, Sabys 101 Limited gives notice that it intends to lodge a referral application for the Project. It will not file its referral application for 20 working days following the date of this email in order to provide the Christchurch City Council the opportunity to respond to this notice.

Project description

The Project is located at Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573) and 6 Wroots Road. I attach a current (draft and tentative) scheme plan in order to give you a better understanding of the Project details.

If you have any questions, please get in touch, and I look forward to hearing from you in respect of this notice.

Thanks,
Kerstin

Ngā mihi | Kind regards,

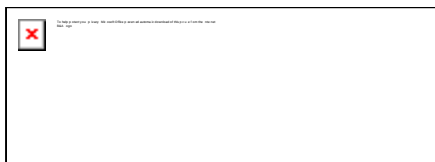
KERSTIN GHISEL

Senior Associate

s 9(2)(a)

s 9(2)(a)

PO Box 1749,
Christchurch 8140
Level 3, 61 Cambridge
Terrace,
Christchurch Central
City, Christchurch
8013

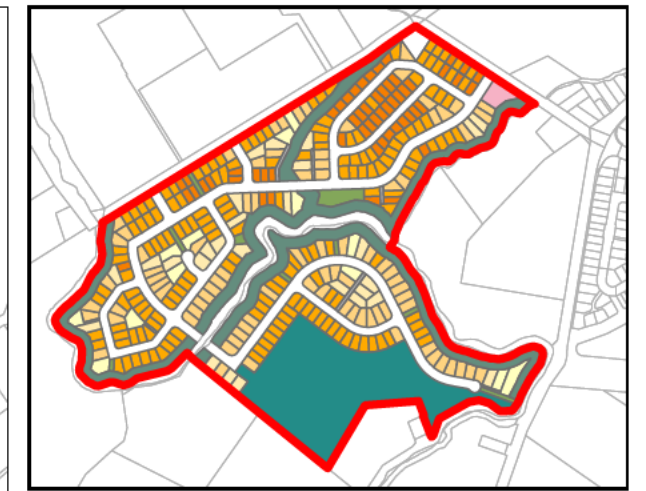
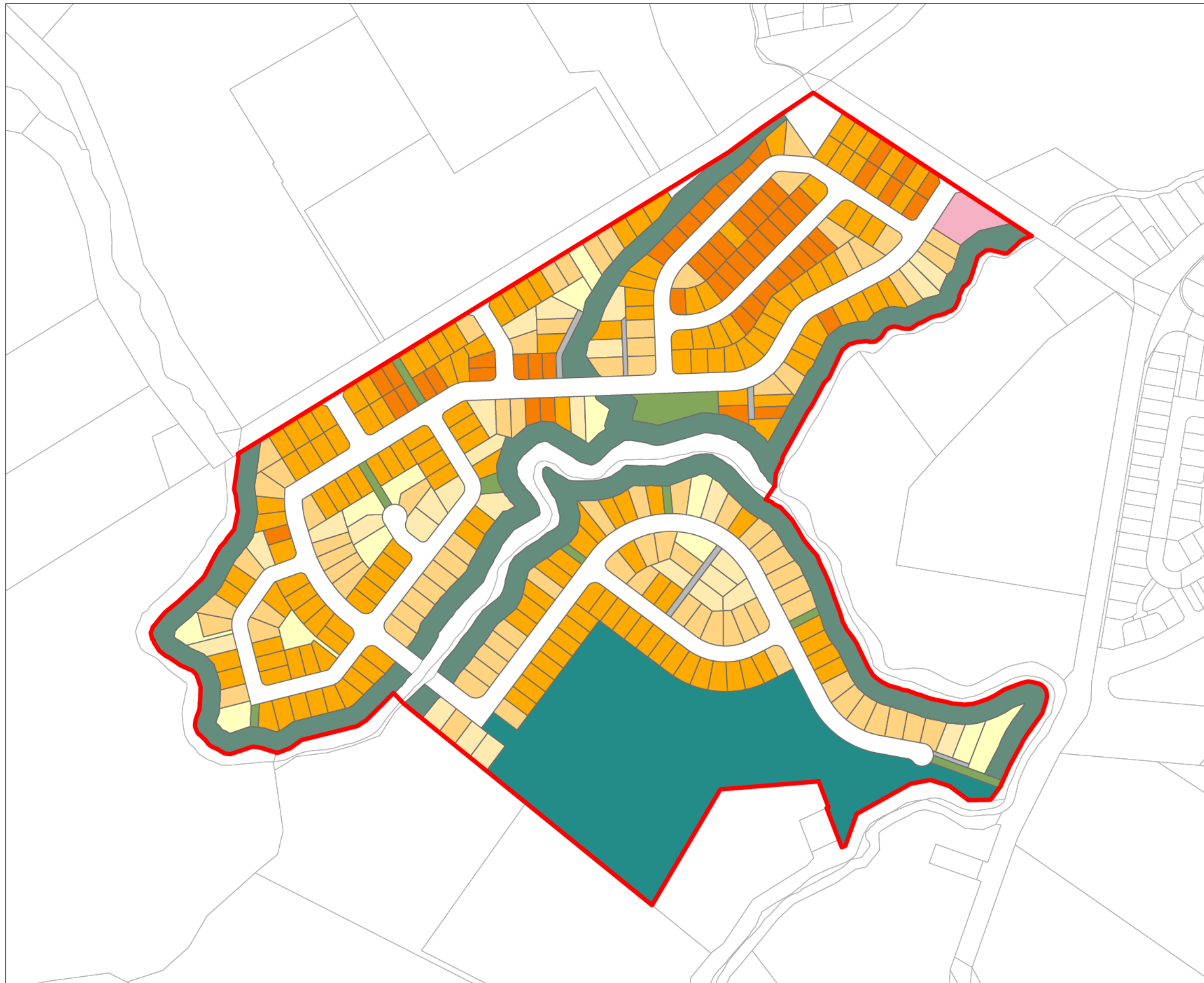


Kerikeri | Whangārei | Warkworth |
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Tauranga | Havelock North | Wellington
|
Christchurch | Wānaka & Queenstown

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Legend

- SiteBoundary
- LINZ NZ Primary Parcels
- NeighbourhoodCentre
- Public Open Space
- Riparian Margins
- Stormwater Management
- Right of Way
- <400m²
- 400-500m²
- 500-600m²
- 600-700m²
- >700m²

Client: Franco Farms Limited
Job Number: 026458

Drawing: Lot Area Plan
Version: Draft
Date: 24/03/2026

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Sheet: 1 of 8



Candys & Sabys Block
Halswell, Christchurch

B&A
Urban & Environmental



- Legend**
- SiteBoundary
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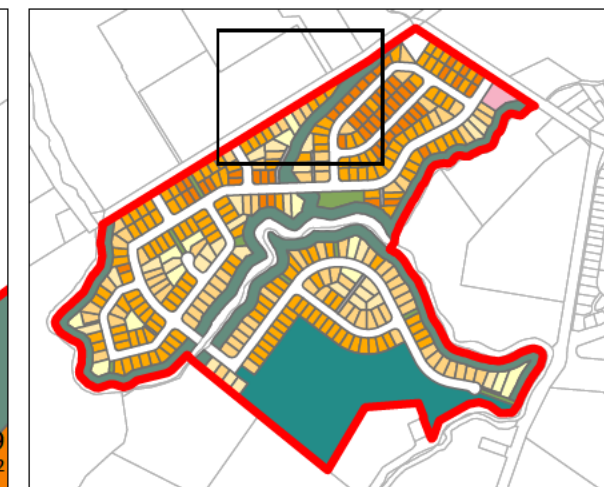
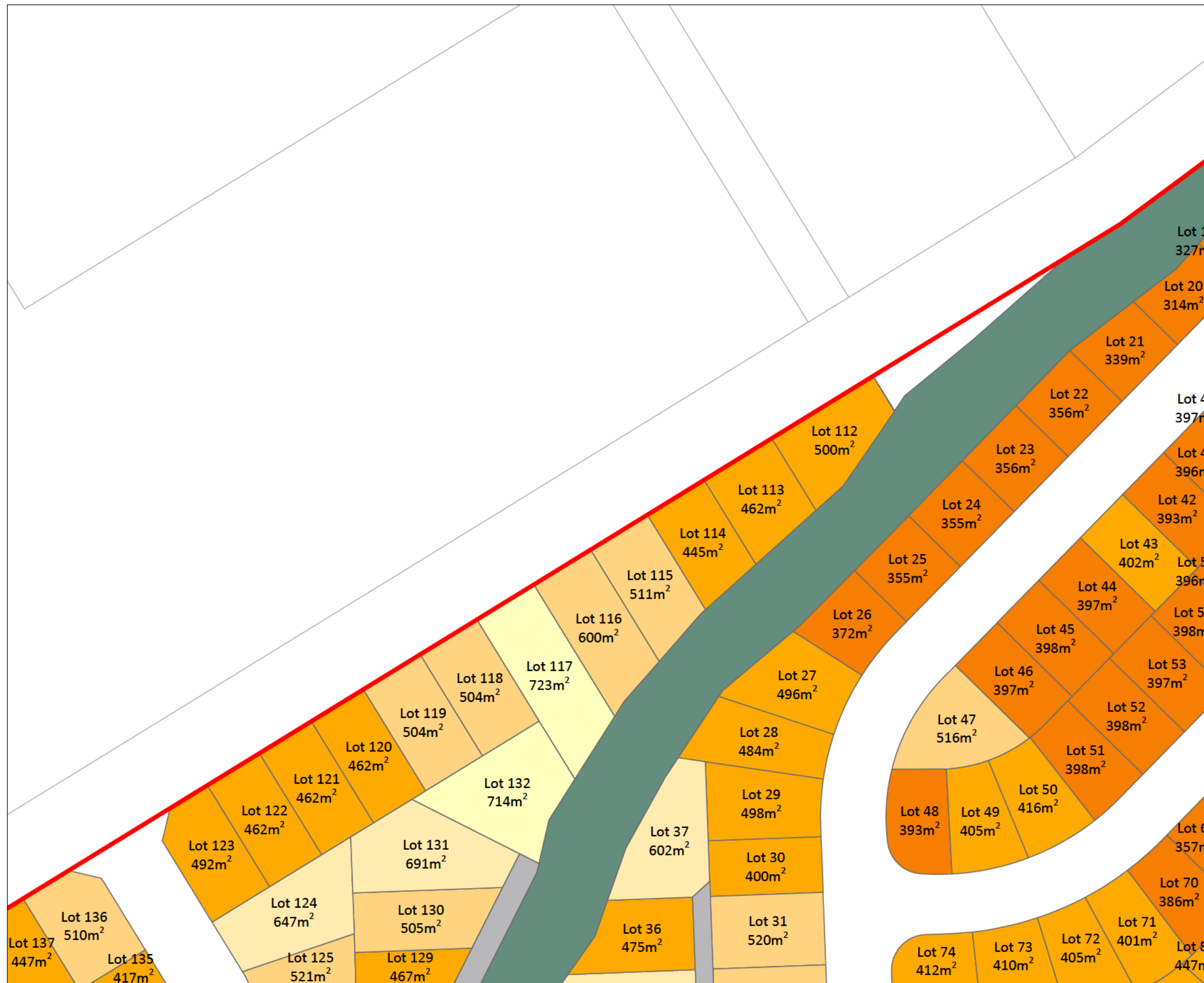
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Candys & Sabys Block
Halswell, Christchurch

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Urban & Environmental



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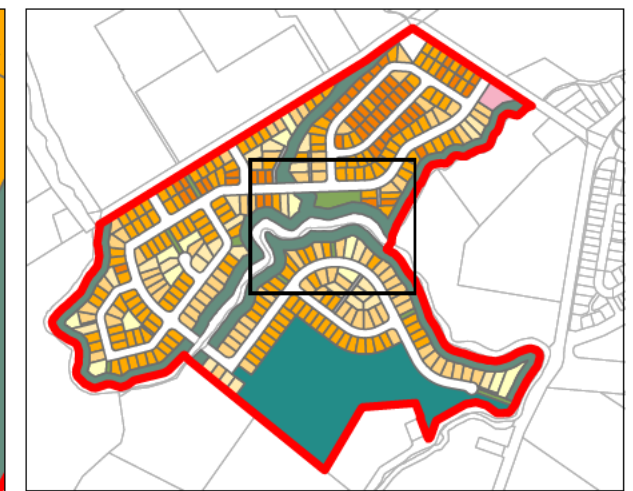
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Candys & Sabys Block

Halswell, Christchurch

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Urban & Environmental



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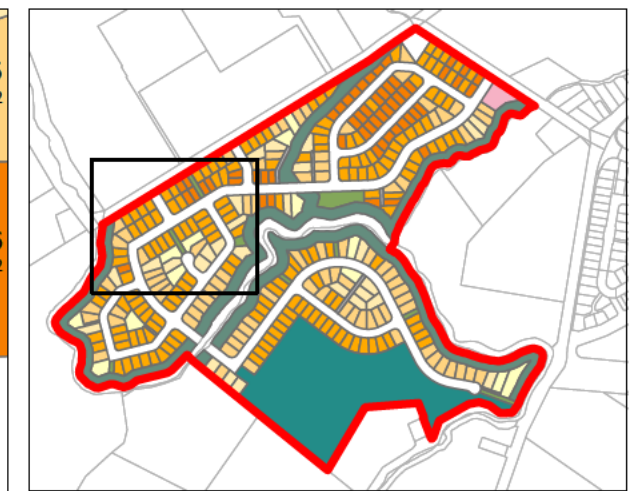
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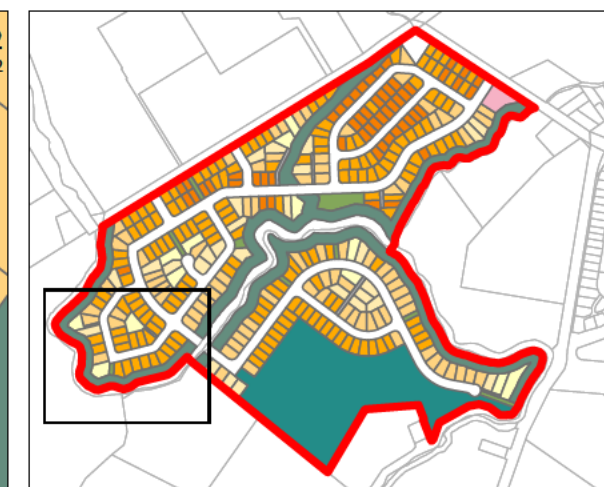
Candys & Sabys Block

Halswell, Christchurch

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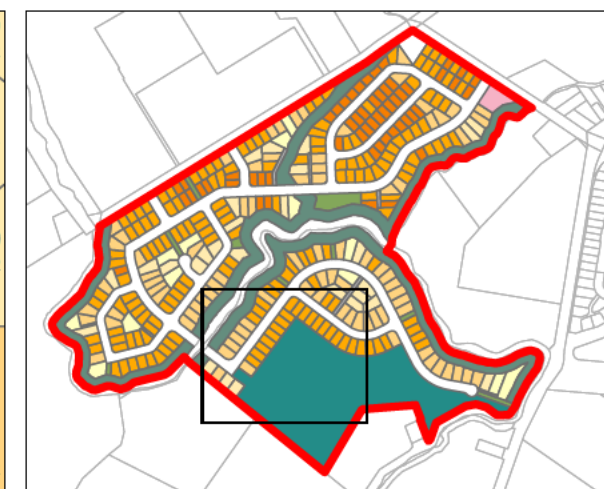
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Candys & Sabys Block

Halswell, Christchurch

B&A
Urban & Environmental



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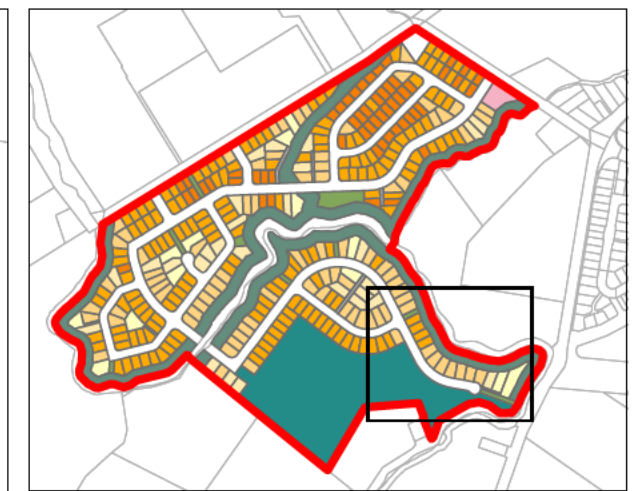
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Sheet: 7 of 8



Candys & Sabys Block
Halswell, Christchurch

B&A
Urban & Environmental



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Candys & Sabys Block
 Halswell, Christchurch

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Appendix 2 – CCC strategic planning and policy advice on Fast Track referrals

City Planning Unit

Date: 31 July 2026

Title: **Strategic planning and policy advice on Fast Track referrals received by Christchurch City Council**

From: Helaina Gregg, Principal Advisor Policy; Sarah Oliver, Team Leader Planning

To: Francis White, Senior Planner; Owen Jeffreys, Planner Level 3; Vincent Ashman, Senior Planner; Odette White, Senior Planner

CC: Paul Lowe, Manager Resource Consents; Ben Rhodes Manager Planning

Introduction

This memo provides strategic planning and policy advice on Fast Track referrals received by Christchurch City Council seeking to urbanise land currently zoned rural under the Christchurch District Plan.

The advice comments on the strategic alignment of these proposals, context within the Council's planning programme, and impacts of these proposals on Council infrastructure and service provision.

Greater Christchurch Spatial Plan

The Greater Christchurch Spatial Plan (GCSP), the Future Development Strategy for Greater Christchurch's urban environment, sets out the Council's vision for how the subregion will grow and change over the next 30 years.

The GCSP, together with the Christchurch District Plan, guides Council's planning and investment into infrastructure and services. The strategy for Christchurch has long directed growth towards targeted intensification within its urban centres and along key public transport corridors.

Major greenfield growth areas were planned with supporting infrastructure in the early 2000's, with many near reaching full development. This approach has maintained a competitive housing market and enabled the city to recovery well from the impacts of the Canterbury Earthquakes.

Whilst the city retains some rural zoned land around its periphery and within Banks Peninsula, its use and contribution to the rural economy is limited. Further, council recognises the on-going demand for standalone housing and large-scale industrial developments, more readily able to be provided for through greenfield developments.

The GCSP recognises that greenfield development will continue to play a role in accommodating future housing and business growth. To support the Plan's direction and principles, greenfield development needs to:

1. Be well connected with employment, services and leisure through public and active transport networks
2. Be integrated with existing urban areas
3. Meet a need identified by the latest Housing and Business Development Capacity Assessment
4. Be at the right scale, density and location to minimise impact on highly productive land and existing permitted or consented primary production activities.

Ōtautahi Christchurch Planning Programme

The implementation of the GCSP, including consideration of future urban areas, is primarily directed through the Ōtautahi Christchurch Planning Programme, which was endorsed by the Council in November 2024.

The OCPP sets out the city's planning priorities and guides the delivery of outcomes under the Christchurch District Plan and national direction such as the National Policy Statement for Urban Development. Regarding greenfield development, the ŌCPP is focusing on locations that exhibit the following:

- High demand
- Good accessibility to employment and services
- Ability to meet a specific housing need
- Commitment to protecting natural and cultural landscape character and settings, and highly productive land
- Which do not foreclose long-term options for rural, open space and community uses.

Until the council has undertaken its evaluation of options for new greenfield land, including investigated, designed, approved and funded growth infrastructure, there is very limited capacity to support additional greenfield development, beyond that already enabled. Strategic planning is fundamental to understanding how new developments may impact the operation of wider networks and flow on effects potentially constraining planned enabled area, importantly medium and higher density zoned areas.

Fast Track proposals seek to proceed in advance of council's programme, risking development being planned and designed in an ad hoc and uncoordinated manner. This approach undermines the Council's ability to deliver integrated and optimal infrastructure outcomes, and its ability to service plan-enabled growth and capacity.

Accordingly, our position is that additional greenfield development in these areas should not be progressed until the necessary strategic planning has been completed and an appropriate infrastructure and investment response for the city has been identified.

Housing Development Capacity Assessment

The justification to rezone land now in an ad hoc, uncoordinated manner, is not evidenced by a lack of feasible housing capacity. The demand for additional housing in Christchurch over the short, medium and long term is shown in Table 1 below. The plan-enabled capacity from residential, commercial and mixed-use zones is 458,000. The total feasible capacity is 68,200, comprising of residential zones (50,800), high density and mixed use (9,800) and Greenfield (7,600).

Table 1: Demand for additional housing in Christchurch City

Area	Short (5 year)	Medium (10 year)	Long (30 year)
Christchurch	11,208	22,152	65,640

*based on high projection +20 percent margin

This assessment confirms that Christchurch has sufficient development capacity to meet anticipated housing demand over the next 30 years and satisfy its obligations under the NPS-UD.

An updated assessment is to be completed shortly, but again concludes Christchurch has sufficient development capacity over the next 30 years. It does however raise an opportunity to review demand for standalone homes across the broader Greater Christchurch region, including the ability of the current stock to meet future needs, and how any additional demand can be accommodated through well planned neighbourhoods in the appropriate locations.

Impacts on the Council's planned infrastructure and service provision

Large scale infrastructure projects require long lead times for planning, financing, and delivery. This means following a long-term plan is essential for delivery. If priorities shift to unplanned and out of sequence development, there are opportunity costs, such as displacing planned investment (both capex and opex), for planned and sequenced infrastructure and service provision.

The current Christchurch Long-Term Plan makes no provision for either capital or operational expenditure in this area to enable greenfield development, and these costs are not reflected in the development contributions currently levied. Any decision by the Council to amend these plans to provide infrastructure for this development would require reprioritisation, potentially displacing planned investment in other areas of Christchurch.

Enabling additional large-scale development through the fast-track process, ahead of planned sequencing, therefore risks creating levels of out-of-sequence growth that are difficult and costly to service. This has the potential to place substantial pressure on infrastructure networks and Council services that are already under strain and are not currently planned or funded to support development in these areas.

To address this funding gap identified, any fast-track proposal will need to demonstrate how the upgrades to infrastructure can be achieved such that the development can be appropriately serviced, including both the connections to outfalls and downstream infrastructure where capacity is constrained. If unresolved and unfunded, Council may refuse (under Christchurch City Council bylaws) any request for infrastructure connections until adequate capacity exists.

Conclusion

While it is recognised that there continues to be strong market demand for stand-alone housing across Greater Christchurch, there is currently limited capacity to support additional greenfield development in the remaining Christchurch rural areas. Recognising this market demand for greenfield development, Council has a growth programme in place to evaluate options and investigate infrastructure provision.

Fast Track proposals are not resolving a current regional issue in terms of insufficiency, nor if approved will be effective in improve market competitiveness, given the significant current infrastructure capacity constraints. It is Council's position that Fast Track proposals should not be progressed until the necessary strategic planning has been completed and an appropriate infrastructure and investment responses have been identified. The timing of this work being to occur in such time to inform the development of the Regional Spatial Plan, being the most appropriate process to identify future long term growth areas.

Your written comments on a project under the Fast-track Approvals Act 2024

Project name	Franco Farms Limited Project
--------------	------------------------------

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name	Director-General of Conservation Statutory delegations are in place for the Department of Conservation (DOC / the Department) to provide commentary on behalf of the D-G.		
*First name	Shawn		
*Last name	Gardner		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz ;		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manager's signoff

Linda Kirk
Fast Track Applications Manager

07 July 2026

Director-General of Conservation s17 comments

Project name	Franco Farms Limited
Applicant name	Sabys 101 Limited
Application number	FTAA-2604-1219
Project summary details	The project is to establish and construct an urban development over approximately 35 hectares to deliver approximately 350 residential lots (to enable future housing construction) with supporting infrastructure (roading, three waters services, stormwater management), neighbourhood centre services and amenities, and riparian enhancement. The project area is located across Lot 3 DP 68573 Sabys Road and 6 Wroots Road in Halswell, near Christchurch, in the Canterbury Region. The project proposes to traverse property that is part of the Halswell River Esplanade Reserve (administered by Christchurch City Council) and the Halswell River Endowment Area (administered by Canterbury Regional Council). The applicant is applying for approvals under the Wildlife Act 1953 and for Complex Freshwater Fisheries Approvals.

1 Overview of comments

1.1 Applicant Engagement

- 1.1.1 As the project includes an approval under a specified Act for which the Director-General of Conservation is the administering agency, the applicant was required to notify DOC and allow 20 working days to respond before lodging the referral application in accordance with section 11.
- 1.1.2 In relation to this application, DOC has had the following engagement with the applicant:
- 1.1.3 The applicant first contacted DOC on the 22nd of January 2026;
- 1.1.4 A meeting occurred with the applicant on the 3rd of March 2026;
- 1.1.5 DOC provided a pre-lodgement consultation summary on the 24th of March 2026, this document is included as a part of the applicant's consultation record lodged with its referral application;

UNCLASSIFIED

- 1.1.6 The applicant notified DOC of its intention to lodge its referral application on the 15th of April 2026.

1.2 Conservation Approvals

- 1.2.1 The referral application states that the Project will require approval under the Wildlife Act 1953 for lizards and bats.
- 1.2.2 The application also states that approvals will be required under the Freshwater Fisheries Regulations 1983 for the construction of a dam or culvert on Knights Stream.

1.3 Other considerations

- 1.3.1 The applicant should ensure that all required approvals are applied for, either through the Fast-track process or through business-as-usual. In relation to this specifically:
- 1.3.2 The applicant should engage with Canterbury Regional Council in relation to any proposed works within the Halswell River Endowment Area, which is a Local Purpose Reserve under the Reserves Act 1977. Canterbury Regional Council is the administering body for this reserve and therefore responsible for any required approvals.
- 1.3.3 The applicant should engage with Christchurch City Council in relation to any proposed works within the Halswell River Esplanade Reserve, which is a Local Purpose Reserve under the Reserves Act 1977. Christchurch City Council is the administering body for this reserve and therefore responsible for any required approvals.

1.4 Conclusion

- 1.4.1 In conclusion, DOC is not aware of any reason the Project should not be referred.

2 Criteria for Minister's decision on referral application

Sections 21 and 22 of the FTAA set out matters to be considered by the Minister in determining whether a referral application should be accepted.

Comments below are targeted to provisions where DOC has specific interests or information relevant to the Minister's decision.

2.1 Criteria for declining a referral application

- 2.1.1 Section 21 sets out the criteria for the Minister for declining a referral application. DOC has considered these criteria and provides comments in the table below.

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	Based on the information available, DOC has considered the ineligibility criteria at sections 5(1)(h), (i), (j) and (k), and has not identified anything that would make the

Section	Criteria	Comments
		project ineligible under these criteria. However, DOC notes the following: DOC identified in pre-lodgement consultation that the project occurs on or near the following reserves under the Reserves Act 1977: • Halswell River Esplanade Reserve, which is a Local Purpose Reserve under s.23 of the Reserves Act and is administered by Christchurch City Council; • Halswell River Endowment Area, which is a local Purpose Reserve under s.23 of the Reserves Act and is administered by Canterbury Regional Council. It is DOC's opinion that this does not make the Project ineligible under s.5(1)(i), (j), or (k) because: • (i): The relevant reserves are not national reserves; • (j): The reserves are both vested in local authorities; • (k): The reserves are both managed by a local authority However, DOC notes that any works undertaken within these reserve areas will require approvals from the appropriate authorities under the Reserves Act 1977.
21(3)(c)	Is there adequate information to inform a decision	With respect to the approvals identified in the referral application for which DOC is the administering agency, DOC considers the information is adequate in terms of a referral decision.
21(4)	Are there any other reasons to decline the application?	Based on the information available, DOC has not identified any reason why the Project should be declined.
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	Based on the information available, DOC has not identified any inconsistency with any relevant Treaty settlement or other obligations.

Section	Criteria	Comments
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	Based on the information available, DOC has not identified any reason why the Project should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	DOC considers it is likely that adverse effects of the Project can be addressed through appropriate conditions on any substantive approvals.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the applicant's compliance history.
21(5)(g)	Would a substantive application have any competing applications	Based on the information available, DOC has not identified any competing applications in respect of conservation approvals.

2.2 Criteria for accepting a referral application

2.2.1 Section 22 sets out the criteria for the Minister for accepting a referral application.

2.2.2 DOC has considered these criteria and has provided comments in the table below:

Section	Criteria	Comments
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	Given the multiple approvals sought, there may be cost and efficiency benefits for the Applicant in terms of consideration of the approvals being combined under the FTAA decision-making framework. However, as noted previously, any work that may occur on the Halswell River Endowment Area or the Halswell River Esplanade Reserve will require approvals under the Reserves Act 1977. The applicant does not appear to have indicated the need for these approvals in their referral application.
22(2)(a)(ix)	Will this project address significant environmental issues?	No
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	The following DOC Statutory Planning documents are relevant to the Project: • Conservation General Policy (2005); • Canterbury (Waitaha) Conservation Management Strategy 2016 At a high level, no inconsistency with these documents has been identified, but the Project will need to consider them if it proceeds to a substantive application.
22(b)	Any other matters the Minister may consider as relevant?	No

3 Matters for the Minister to specify (s27)

3.1.1 None identified



Linda Kirk
Fast Track Applications Manager

Date: 07 July 2026

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

YOUR COMMENT ON THE FRANCO FARMS SUBDIVISION

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email.

Project name Franco Farms Subdivision FTAA-2604-1219			
1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Canterbury Regional Council (Environment Canterbury)		
First name	Dwayne		
Last name	Daly		
Postal address	200 Tuam Street, Christchurch Central, Christchurch		
Home phone / Mobile phone	-	Work phone	s 9(2)(a)
Email (a valid email address enables us to communicate efficiently with you)	s 9(2)(a) fasttrack@ecan.govt.nz		

2. Please provide your comments on this application			
☒	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

Thank you for your comments

08/07/2026

Stephanie Frame
Manager – Fast-track Operations
Fast-track Applications
Environmental Protection Authority
info@fasttrack.govt.nz



Customer Services
P. 03 353 9007 or 0800 324 636

PO Box 345
Christchurch 8140

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

www.ecan.govt.nz

Kia ora Stephanie,

Thank you for your letter received 22 June 2026 regarding the Franco Farms Subdivision project from Sabys 101 Limited.

Please find attached the response from Canterbury Regional Council (CRC) to the specific questions raised in the above letter. Also included within the response are general comments on the proposal which may assist the Minister in making their determination under section 21 of the Fast Track Approvals Act 2024 (FTAA).

CRC hope that these comments will assist the Minister in determining whether to accept the referral application and proceed with referring the project. Should any further information be required, please do not hesitate to contact us.

Ngā mihi nui,

A handwritten signature in black ink, appearing to read "D Daly", is positioned above the printed name.

Dwayne Daly
Principal Consents Planner

CANTERBURY REGIONAL COUNCIL COMMENTS UNDER S17 FTAA – FRANCO FARMS SUBDIVISION

Specific questions from the EPA

1. Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.

CRC does not hold a record of any competing applications (per the definition in the Fast-track Approvals Act 2024 (FTAA)) in the same project area.

2. In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please provide written confirmation.

In accordance with section 30(3)(b) of the FTAA, CRC can confirm that there are no existing resource consents of that kind.

The site is within the Selwyn-Waimakariri combined surface water / groundwater allocation zone, which is over-allocated.

The application states that water may be taken under CLWRP Rule 5.113 for dust suppression as a permitted activity, unless the permitted activity criteria cannot be met, in which case consent would be needed as a Restricted Discretionary Activity under Rule 5.114A.

The application states that water will be taken under CLWRP Rule 5.119 for dewatering as a permitted activity, unless the permitted activity criteria cannot be met, consent would be needed as a Restricted Discretionary Activity under Rule 5.120.

The application states that water will be taken and used under CLWRP Rule 5.126 non-consumptively as a Restricted Discretionary Activity.

The referral application contains insufficient detail to confirm compliance or otherwise with these rules or what consents are required. Further detail in any substantive application would assist CRC in confirming the applicable regional consent requirements.

The site is within the Selwyn Te Waihora subregion. However, no subregional rules supersede the rules listed above. Note: Subregional rule 11.5.37 makes the take and use of water a prohibited activity if the take results in an over-allocation, however the water is proposed to be taken within permitted activity limits or proposed to be non-consumptive. CRC notes that if a subregional rule for the take of water were applicable, the take would result in over-allocation and would be a prohibited activity. In that case, existing consents of the kind specified in section 30(3)(b) of the FTAA would apply.

3. Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act)

The application states that the project does not involve any ineligible activities. Additionally, CRC is not aware of the activity involving any ineligible activities as defined in Section 5 of the Act.

4. Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of Act).

Reasons to decline a referral application under subsection (4) include:

(a) the project would be inconsistent with any of the following:

- (i) a Treaty settlement:
- (ii) the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019:
- (iii) the Marine and Coastal Area (Takutai Moana) Act 2011:
- (iv) a Mana Whakahono ā Rohe:
- (v) a joint management agreement:

CRC is not aware of any reason why the Franco Farms subdivision proposal would be inconsistent with any of the above matters.

(b) it would be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts:

CRC is not aware of any reason why the matters to be authorised by the proposed approvals would be more appropriate to deal with under another Act.

(c) the project may have significant adverse effects on the environment:

The referral application contains insufficient detail to determine if the project would have significant effects on the environment. However, based on the information available at present and taking into account the comments of CRC's technical auditors, it is unlikely that the project may have significant adverse effects on the environment. This view is preliminary and would need to be confirmed through the substantive application process, including through a full assessment of effects and technical review.

(d) the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) has a poor compliance history under a specified Act that relates to any of the proposed approvals:

Sabys 101 Limited has no prior consents with CRC and therefore there is no compliance history to comment on.

(f) the project includes an activity that is a prohibited activity under the Resource Management Act 1991:

The referral application contains insufficient detail to conclusively determine the applicable rules or what consents are required. Based on the information available the proposal does not include an activity that would be a prohibited activity under the Resource Management Act 1991.

(g) a substantive application for the project would have 1 or more competing applications:

CRC does not hold a record of any competing applications (per the definition in the Fast-track Approvals Act 2024 (FTAA)) in the same project area.

(h) in relation to any proposed approval of the kind described in section 42(4)(a) (resource consent), there are 1 or more existing resource consents of the kind referred to in section 30(3)(a).

Regarding section 42(4)(a), CRC acknowledges that based on the information currently provided, that the proposal is consistent with 42(4)(a), of the FTAA, as it is applying for multiple resource consents that would otherwise be applied for under the Resource Management Act 1991(RMA).

Regarding section 30(3)(a) of the FTAA. The site is within the Selwyn Te Waihora subregion. However, no subregional rules supersede the rules listed above. Note: Subregional rule 11.5.37 makes the take and use of water a prohibited activity if the take results in an over-allocation. If a subregional rule for the take or water were applicable, the take would result in over-allocation and would be a prohibited activity. In that case, existing consents of the kind specified in section 30(3)(b) of the FTAA would apply.

In relation to the other matters listed in 21(5) of the Act, CRC makes no comment.

GENERAL COMMENTS FROM CRC TO ASSIST WITH CONSIDERATION AGAINST S22 FTAA

Regional or National Benefits

CRC has not undertaken a peer review of the Economic Assessment prepared by Insight Economics and submitted by the Applicant in support of their referral application. However, CRC recognises that the proposal will develop 35 hectares of land to enable the 350 residential lots to be constructed, along with supporting infrastructure including roading, stormwater management and three waters services.

The Economic Assessment noted that the proposal would enable an increase in housing supply in the wider Christchurch area, which may help to meet high population growth experienced in and around Christchurch. In addition, the assessment indicates that the proposal would provide employment for 240 or more full-time equivalent workers over four years. Totalling approximately \$83 million in wages, and \$138 million in GDP accruing within Canterbury. Further Insight Economics notes that the proposal is likely to result in wider economic benefits that are not captured through direct modelling.

CRC do not disagree with this assessment nor question it and therefore have not had this assessment peer reviewed by an independent auditor.

Canterbury Regional Policy Statement (CRPS)

The Canterbury Regional Policy Statement (CRPS) gives an overview of the significant resource management issues facing the region, including issues of resource management significance to Ngāi Tahu. The purpose of the CRPS is to set out objectives, policies and methods to resolve those resource management issues and to achieve the integrated management of the natural and physical resources of Canterbury. The CRPS seeks to ensure development, including the associated use and provision of infrastructure and services, appropriately manages adverse effects on the environment in order to enable people and communities to provide for their social, economic and cultural well-being.

CRC notes that development can either enable or adversely affect the ability of people and communities to provide for their social, economic and cultural wellbeing, and health and safety. Once development is established it is likely to exist for a number of generations. Changing the form and structure of established urban, rural residential and rural areas can be difficult and expensive. Therefore, the CRPS seeks to achieve a form of development that provides over the long term for the changing needs of people and communities.

Land use and infrastructure require careful consideration in order to ensure potentially significant benefits to people and the community are achieved and that the adverse effects on the environment are appropriately avoided, remedied, mitigated.

Overall, the proposal appears to be generally consistent with the CRPS, subject to adverse effects on the environment being appropriately avoided, remedied, or mitigated.

CRC anticipates that the applicant would provide within a substantive application (if referred) a comprehensive assessment of adverse effects as well as suitable Management Plans addressing adverse effects. If a substantive application can appropriately address adverse effects, the proposal would likely be consistent with the CRPS.

Regarding Objectives 6.2.1 and 6.2.2 assessed by the Applicant, CRC notes that the proposal is partly consistent with 6.2.1 and Objective 6.2.2. CRC notes that the proposed site for the Franco Farms subdivision does not occur within an existing urban area, Greenfield Priority Area, or Future Development Area identified on Map A of the CRPS. CRC note that the site is classed primarily as LUC 2 with a small section classified as LUC 1. Both LUC 1 and 2 are defined as versatile soils that will support the widest range of productive uses with the least inputs.

A detailed assessment against the relevant objectives and policies of the CRPS should be provided as part of the substantive application. Until that assessment is provided, CRC cannot confirm whether the proposal is fully consistent with the CRPS, particularly in relation to urban growth, infrastructure sequencing, natural hazards, and loss of productive land.

CRC notes that the CRPS generally reflects the RMA terminology of avoiding, remedying or mitigating adverse effects. The FTAA also provides for offsetting and compensation as potential measures to address adverse effects where appropriate.

Canterbury Land and Water Regional Plan (CLWRP)

The CLWRP sets out objectives and policies that identify the importance of high-quality freshwater for social, cultural and economic wellbeing, and that recognise the connectivity between land-use and the various sources of freshwater. The CLWRP also recognises that land-use and development will occur but can have adverse effects on the quality of freshwater, if not appropriately managed. Consequently, the CLWRP seeks that land-use and development occur in a manner that avoids, remedies or mitigates adverse effects on the biophysical and cultural values, including Ngāi Tahu values, of freshwater in Canterbury.

CRC anticipates that the applicant would provide within the application a detailed assessment of adverse effects as well as comprehensive Management Plans addressing adverse effects of both earthworks, disturbance of contaminated land (HAIL activities), and stormwater during the construction and operational phase will be included within the substantive application. CRC notes that the Application is split across the jurisdiction of both CCC and SDC.

From what is provided in the application CRC notes that in terms of consenting requirements:

- Land use consent under section 9 of the Resource Management Act 1991 (RMA).
- Works in the bed of a lake or river consents under section 13 of the RMA.
- Take and use of water consents (to take water non-consumptively) under section 14 of the RMA.
- Discharge consents (construction and operational phase) under section 15 of the RMA.

CRC notes that a detailed rules assessment will need to be provided before an equally detailed assessment can be provided. This would assist CRC in confirming the relevant activity status and consent requirements.

Regarding Objectives 3.1-3.3 assessed by the Applicant, CRC notes that the proposal is largely consistent with 3.1, 3.2, 3.5, 3.11 and that 3.3 is not relevant as the proposal for a subdivision does not meet the definition for nationally and regionally significant infrastructure. Regarding objectives 3.20-3.21, CRC notes that the flooding effects have not yet been reviewed by the appropriate technical teams to confirm that the proposal will not exacerbate erosion, risk of flooding or adversely affect water quality and ecosystems.

Regarding strategic policies 4.1-4.3 assessed by the Applicant, CRC notes that the proposal is largely consistent. This is due to non-consumptive taking or a very small amount of water being taken within the permitted activity limits. In addition to setbacks and distance from lakes, rivers, wetlands.

CRC also notes that the proposed site for the Franco Farms subdivision does not occur within existing urban area, Greenfield Priority Area, or Future Development Area identified on Map A of the CRPS. Noting that the site is classed primarily as LUC 2 with a minor section falling under LUC 1. Both LUC 1 and 2 are defined as Versatile soils that will support the widest range of productive uses with the least inputs.

A detailed assessment against the relevant objectives and policies of the CLWRP should also be provided as part of the substantive application. Until that assessment is provided, CRC cannot confirm compliance, particularly in relation to stormwater, flooding, earthworks, groundwater, ecology and contaminated land.

Contaminated Land

The Preliminary Site Investigation identified a number of HAIL activities across the project site with the potential to contaminate land. Some HAIL activities intersect the location identified for the stormwater reserve as per the Draft Conceptual Masterplan.

The PSI recommended a Detailed Site Investigation be undertaken across all risk areas prior to development of the site. CRC supports that recommendation, as the extent of contamination from the identified HAIL activities is not yet known. Further investigation would assist in understanding the potential environmental effects. A Remedial Action Plan and site validation report might also be required depending on the DSI results.

Noting also that local fill material from the site and imported fill will be used. CRC recommends that fill verification protocols be added to the consent conditions.

Land Resources

Regarding the HPL assessment the desktop soil evidence (from SMap) identifies deep, stoneless silt and fine sandy loam soils with unlimited rooting depth and moderate to very high-profile available

water. Approximately 71% of the site is mapped as versatile soils, consistent with the site's LUC 1 and 2 classifications, and physically suited to a range of land uses including horticulture, vegetable production, arable cropping and intensive pastoral use. According to S-map, approximately 28% of the site comprises imperfectly and poorly drained soils, which have wetness limitations, but these can be addressed.

CRC have concerns on the report's assessment under clause 3.10 of the NPS-HPL. Specifically, the economic viability assessment (section 3 of the HPL report) is not applied to the land uses these soils are most suited to. Noting highly versatile soils have been identified, the report tests viability only against "small scale lifestyle grazing" land use, modelled using data from a dryland breeding and finishing farms. Horticultural and arable uses, the uses for which LUC 1 & 2 soils of this type are valued, are dismissed quickly, primarily on the basis of lack of irrigation, without any financial analysis. The land use selected as the test case for economic viability does not follow from the soils evidence presented, and CRC considers that the constraints relied on do not appear to be permanent physical limitations of the soil.

The other concern is that the assessment of the significance of the loss (section 4 of HPL report) does not consider cumulative loss of HPL. The site sits at the boundary of two districts, and Christchurch in particular has a small amount of HPL (compared to other districts) that has been subject to ongoing incremental loss to urban development. The report's figure of 16,856 ha is a gross LUC 1-3 area that predates the NPS-HPL, and does not apply the zoning exclusions in the HPL definition. Based on some of the previous GIS analysis of likely highly productive land areas in Canterbury, only approximately 3,000 ha of LUC 1-3 land in CCC remains rural zoned, of which roughly half is the most versatile LUC 1-2 land, and it is mostly in small contiguous regions. On that basis the proposed loss associated with this development represents is greater than the 0.2% stated in the report and is probably a loss between 1 % and 2 %. Assessing the loss only as a percentage of a total LUC 1-3 land area mapped in the district, without considering cumulative losses across both districts, understates its size.

The infrastructure and geotechnical information indicate the site will require substantial and widespread earthworks, land raising, regrading and engineered filling to meet residential building and flood management requirements. Regarding the information provided, the development would substantially destroy the existing soil profile across the site.

While CRC acknowledges that the proposal is at an early stage, the substantive application would benefit from further information regarding soil reuse. This could include how the deep alluvial soils could be reincorporated into the engineered environment, or the extent to which soil functions could be retained or rebuilt within reserves, the stormwater area, riparian margins and other open permeable spaces.

Replacing existing deep, functional soils with shallow reconstructed topsoil (e.g. 0.3 m) over engineered fill is likely to reduce valuable soil functions that support vegetation such as trees, water infiltration and storage, attenuation of stormwater flows, and resilience of urban green spaces to drought and high rainfall. It is recognised that the proposed open space areas are limited in size, with the largest being the retention basin, but CRC recommends the application include a soil management plan setting out measures to preserve or rebuild soil functions within them and limit soil function loss. For example: topsoil stripping and stockpiling protocols, minimum reconstructed profile depths in reserves and riparian areas, decompaction of subsoils prior to topsoil replacement, and reuse of site's soil in preference to imported fill where practicable and suitable from performance perspective, including in the stormwater basin.

Groundwater

Based on the information provided, groundwater is expected to be within 0.6-2.8 m bgl. However, noting that these measurements were obtained in January, higher groundwater levels in wetter seasons are therefore likely. This is recognised in both the infrastructure report and geotech report. As such groundwater levels in this area may be within 0.5 m bgl under wet conditions.

Regarding dewatering, due to the presence of silts in the top 3 m of soil from the site, the ingress of any groundwater during excavation works could be low, which might reduce the need for dewatering, especially if this work is progressed under drier conditions. CRC recommends a technical assessment of the need for dewatering be included in the substantive application.

Due to flooding risk, a large portion of the proposed lots will require engineered filling, but it is unclear as yet which part of the site will undergo filling up to which height. CRC recommends that a detailed map of the areas to be filled be included in the substantive application. CRC understands stormwater infrastructure will be laid in the filled material, to ensure that all future lots will drain towards the new roads. It is unclear yet what this infrastructure looks like (there is mention of kerb adaptors or sump connections), but it is expected they will drain part of the stormwater entering the fill material, preventing it from reaching natural groundwater.

It is currently not clear if the stormwater basin will be lined, or if infiltration to ground is part of the discharge method (which might be problematic considering the high groundwater levels at this part of the site). CRC recommends that a technical assessment of the effects on groundwater be included in the substantive application if the basin is unlined. CRC also recommends the stormwater network infrastructure design should be described in detail in the substantive application.

Regarding the stormwater discharge, this seems to be directed to surface water, so CRC expects any effects on groundwater to be minimal.

A reduction in land surface recharge by channelling water to stormwater infrastructure and then to surface water flow rather than infiltrating to the underlying aquifer can affect spring flow. Even though surficial fine sediments are present, recharge to groundwater can still occur through these sediments, particularly when the water table is lower. During periods when the water table is high, soils are at full capacity (saturated) and land surface recharge is more likely to run off. The reports do not include an assessment of how much recharge currently occurs at the site and how much this will reduce with site development. Therefore, CRC recommends that the effect on springs/spring flow be technically assessed in the substantive application.

Regarding wastewater, it is proposed to be discharged to the existing CCC sewerage system. There may be a risk that there is not adequate capacity. One option mentioned in the application to bypass this issue is a private onsite wastewater treatment system with discharges to adjacent waterways. For 300+ households, this treatment system would likely require significant space and therefore a revised subdivision layout, and an assessment of the effects on the environment from the discharge would be required.

Regarding drinking water, it is proposed to connect to the town supply. CRC recommends that the substantive application confirm whether the proposed water supply can be accommodated within the consented rates and volumes for the relevant community supply bores. CRC notes that there is no mention of the active domestic bores on properties surrounding the proposed subdivision. If any discharges to ground are anticipated during the construction or operational phase of the subdivision, CRC recommends that a technical assessment of the effect on the water quality in these bores be included in the substantive application.

Land Ecology

Regarding the Ecology Constraints Report, CRC notes in the methods section that there is no specific reference to wetlands and other waterbodies identified in the Canterbury Maps Viewer. It remains unclear what databases were investigated as part of the 'desktop review'. CRC recommends that this is clarified in the substantive application.

CRC notes that the field assessment was carried out over one day by one person. No 'formal fauna surveys' were undertaken. While the presence of various ecological features was "noted", it does not appear that any standard ecological survey and assessment protocols were followed. For example, the report author makes no reference to the Wetland Delineation Protocols appended to the NPS-FM. CRC recommends that this is clarified in the substantive application.

CRC also notes that the Ecological Constraints Report did not assess ecological significance of features either within the project area footprint or the wider potentially affected area against CRPS assessment criteria. (These or similar ecological significance assessment criteria are also contained in the Christchurch and Selwyn District Plans).

Further comment on points where CRC has a different view from the Ecological Constraints Report:

- CRC does not support the recommendation (p14) for "a precautionary survey for bats". CRC considers that the presence of bats here can be excluded and further survey effort is unwarranted.
- CRC does not agree with the classification of 'waterways' on p9 of the report. CRC surface water scientist Michele Stephenson has commented further on this matter.
- CRC considers that all the waterbodies described on p10-12 of the Ecological Constraints Report would also meet the definition of 'natural inland wetland' in the NPS-FM.
- CRC does not agree with the assertion that the 'Artificial Drain' described on p13 of the Ecological Constraints Report is "not a natural inland wetland" because it has "established within a purposefully constructed waterbody". If the account given here of the waterbody's origin is correct, then the feature will be an 'induced wetland' and therefore can be considered as a potential 'natural inland wetland'.
- As noted above, CRC does not agree with the assertion on p14 of the Ecological Constraints Report that 'no natural inland wetlands are present within the site'. No data (i.e. vegetation, soil, hydrology assessments as per wetland delineation protocols appended to the NPS-FM) was provided to support this conclusion.
- The Ecological Constraints Report has not currently considered hydrologically and ecologically connected wetlands upstream or downstream of the proposed works site.
- Following the descriptive information on pages 5-13 of the report, the 'Constraints Assessment and Anticipated Adverse Effects' section (p14) should be expanded upon with data or clear assessment criteria to support the conclusions that ecological values were "low" and that total loss of fauna habitat was "expected to be low".
- CRC recommends that further information is provided to explain how "potential adverse effects could be effectively managed through minimisation and mitigation measures" (p14).

CRC notes that apart from removal of the existing vegetation cover, none of the proposed activities associated with this subdivision development (e.g. as described in the Infrastructure Report) were discussed or considered in the 'Constraints Assessment and Anticipated Adverse Effects' section of the Ecology Constraints Report.

Surface Water Ecology

Nottingham Stream, Knights Stream and the Halswell River are classified as 'Upstream Waterways' under the Christchurch District Plan (CDP), thus requiring a 20-metre setback. The Creamery Drain is classified as a 'Network Waterway' and requires only a 5-metre setback under the CDP. These setback distances have been adopted as the riparian margin width in the Draft Conceptual Masterplan. Creamery Drain connects the Huritini / Halswell River to a waterway system that includes the Creamery Ponds and Quaifes Road waterways, which have strong spring flows and are habitat for threatened kōura and other species including longfin eel and īnanga. Creamery Drain is classified as Critical Habitat for kōura on the CLWRP planning maps. CRC recommends that a wider riparian margin for Creamery Drain is provided to provide an adequate buffer from housing lots and allow for planting of an adequate functional riparian zone to maintain and enhance the aquatic values of this waterway.

Two waterways on the site have been identified in the Ecological Constraints Report as artificial watercourses. CRC agrees with this classification for Coakley Drain, based on the description and photos provided. The other waterway, referred to as Artificial Drain, is in the south of the site where ground levels are lower. In the report it is described as containing water at the time of assessment with the bed covered in macrophytes that included monkey musk, creeping bent and Yorkshire fog. These features suggest the permanent or at least intermittent presence of water in the channel, providing habitat for aquatic flora and fauna. The digitised Black Maps layer on ECan Maps shows that this southern part of the site was formerly wetland (shown as blue in the figure below). While the channel was likely constructed by human activity for drainage purposes, the watercourse should be considered a modified natural waterway for the ecological function and values it provides. It may also meet the definition of a 'natural inland wetland'.

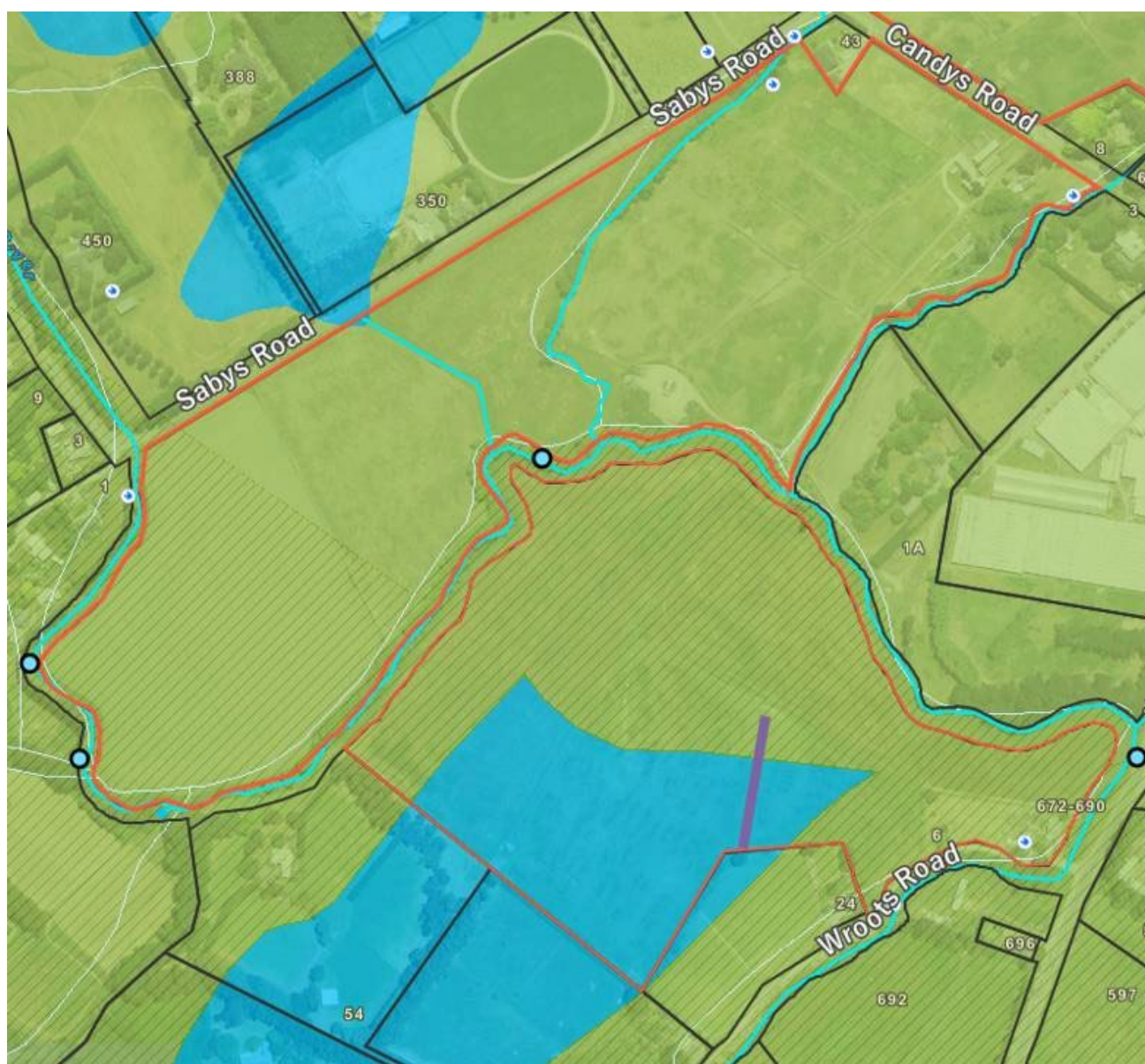


Figure 1. Franco Farms site boundary (red lines) showing Black Maps layer (blue = waterbody/wetland), waterways in blue lines (from CCC Watercourses layer) and purple line = Artificial Drain identified in the Ecological Constraints report. Light blue circles = springs (from ECan Springs Locations layer) and white circles with blue symbol = NZFFD records.

The Ecological Constraints Report notes potential springs were part of the scope of the site assessment that was undertaken. The report does mention that springs are identified on the banks and bed of the Halswell River in Canterbury Maps but currently does not appear to provide further detail from the site assessment regarding springs. Springs hold important hydrological, ecological and cultural values and functions, and it is important that their management and protection is considered within the detailed design of this development. Given the high likelihood that springs are present within the site as well as groundwater flows through the stream bed, CRC recommends that a detailed spring survey is undertaken and the potential effects of development works on spring and stream flows are assessed for the substantive application.

Regarding the work within and near the waterways, the Infrastructure Report states that it is proposed to fill in Coakley Drain as part of the development and incorporate any storm flows into the

development's primary and secondary flow infrastructure. The Ecological Constraints Report provides a brief description of Coakley Drain that indicates it has low aquatic ecological values. However, CRC recommends that this assessment is expanded upon in the substantive application. It is less clear what is proposed for the Artificial Drain from the information provided, however it is noted that its location is within the Stormwater Reserve Area marked on the Draft Conceptual Masterplan. The substantive application will need to include description of all activities proposed in and around all the watercourses on the site as well as an assessment of potential effects from those activities.

Based on the information provided in the Infrastructure Report and the Draft Conceptual Masterplan, there will be two bridges constructed across Knights Stream – one for a local road and one for a pedestrian and cycle footbridge. No permanent culverts appear to be proposed, although temporary culverts may be required for access during the construction phase with associated short-term effects.

The Infrastructure Report mentions shaping of the natural contour in the reserve areas adjacent to Nottingham Stream, Creamery Drain and the Halswell River [Knights Stream] to ensure no ponding will occur and overland flow is directed to the stormwater management area. This indicates the potential for significant earthworks within the riparian reserve areas, with a risk of short-term effects relating to vegetation removal and sediment management and longer-term effects on spring flows and wetland waterway connectivity within the riparian zones. In CRC's view, direction of overland flows within the riparian reserve areas via constructed swales and/or natural contours would be desirable as this maintains a natural connection between the waterways and their riparian zones. Given the large extent of spring-fed waterways flowing through this site and the 20 m setback proposed for these CRC recommends that a Riparian Management Plan should be provided with the substantive application to demonstrate what is proposed within those setbacks to enhance the riparian zone and create beneficial outcomes for aquatic and terrestrial ecology, as well as recreation.

Regarding stormwater management, the Infrastructure Report states that stormwater can be treated and detained onsite before discharging to the Halswell River and the Draft Conceptual Masterplan shows a large stormwater reserve area in the south of the Franco Farms site. A single stormwater facility located in the south appears to be the preferred option and will require the conveyance of stormwater runoff from the north of the site across (over or under) Knights Stream / the Halswell River. This presents a range of potential risks to the river, particularly during the construction phase when works on or near the banks of the river will likely be required.

All stormwater runoff from impervious surfaces will require some level of treatment to meet water quality outcomes for discharge to the river. The Infrastructure Report states that all stormwater emanating from roads, berms and lot frontages will be collected by sumps and pipes and directed downstream to reach the proposed stormwater basins. CRC recommends that consideration is also given to the use of swales and rain gardens where possible rather than just sumps and pipes for conveyance. CRC also recommends in addition to including flood modelling in the substantive application stormwater treatment design will need to be undertaken to ensure that all stormwater discharges from the site can meet CLWRP requirements.

Regarding wastewater, the Infrastructure Report describes three main options for wastewater servicing. Option 3 is a private onsite wastewater treatment system discharging to adjacent waterways. Direct discharge of wastewater to surface water is not encouraged, even with treatment, and particularly when the receiving waterway is a low gradient, spring fed river in a catchment with high ecological and cultural values (Huritini/Halswell River and Te Waihora). CRC recommends a strong preference for either of the other two options that involve connection to the existing CCC network.

Regarding dewatering, CRC considers that a technical assessment of potential dewatering effects will need to include risks to water quality and aquatic habitat from sediment-laden discharges, as well

as the potential for contaminated groundwater associated with HAIL activities that have occurred on the site. Management of dewatering water should be considered separately from construction phase stormwater.

Regarding the PSI report which has identified a number of HAIL activities, where these are located close to waterways, there is a risk that disturbance of soils through earthworks could mobilise contaminants and transport them to waterways. The Infrastructure Report states that a DSI will be required, followed by development of a Remediation Action Plan and / or Site Management Plan to ensure all residual soil contamination levels meet the residential limits. CRC notes that the DSI will also need to consider potential environmental receptors, such as groundwater and / or surface water, not just human health risks, when assessing potential risks from contaminated soils.

Cultural Matters

Correspondence to CRC from Ngāi Tahu in March 2026 indicated that a cultural impact assessment (CIA) should be undertaken on the proposed site due to the flooding and sensitive nature of the site. From Attachment 12 detailing consultation, preliminary mana whenua advice has been provided. However, Mana whenua are best placed to comment on whether the cultural matters identified by Ngāi Tahu have been addressed. CRC notes that a number of recommendations have been provided by Rūnanga. CRC recommends that further engagement is undertaken with Rūnanga to confirm how these recommendations have been addressed, where this has not already been provided.



Comments on referral application under the Fast Track Approvals Act 2024

Franco Farms, FTAA-2604-1219

Contact Details	
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)
Contact person	HNZPT Fast-track Team
Contact Number	(04) 470 8053
Email	fasttrack@heritage.org.nz

General Comments

1. Franco Farms Limited (Applicant) has lodged an application for referral of the Franco Farms (project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. In accordance with section 17(1)(c) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the referral application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.
3. HNZPT has been provided application documents that are relevant to the archaeological authority application. These have been assessed and HNZPT comments as follows:

Consultation and Engagement

4. On 2 March 2026, the Applicant's agent met virtually with HNZPT. The historical background and archaeological potential of the project area were discussed, and the applicants were advised to engage a consultant archaeologist.
5. On 15 April 2026, the applicants emailed HNZPT notifying them of their intent to lodge a referral application under the FTAA.
6. On 13 May 2026, HNZPT provided a response to the notification, noting that:
 - a desktop assessment indicated that the area appeared to have been subject to pre-1900 human occupation
 - HNZPT recommends engaging a suitably qualified archaeologist to assess the project area
 - an archaeological authority would be required if the works had the potential to modify or destroy archaeological sites.

Archaeological Authority Application

7. The Applicant has not provided an archaeological assessment at this stage. The applicant has stated they have engaged an archaeologist, and that any resulting archaeological assessment will form part of the substantive application.



8. The project area is of significance to Ngāi Tahu hāpori due to their continuing relationship with the cultural landscape that the project area sits within. The ara tawhito and freshwater resources found within the area were an integral part of mahinga kai and mahinga toi practices that have supported the iwi for generations.
9. HNZPT notes that relevant Ngāi Tahu entities are being consulted with. Should the project be referred, appropriate consultation documentation with tangata whenua, as set out in Clause 2(i) in Schedule 8 of the FTAA 2024, must be provided with a substantive application.
10. HNPZT notes that no Cultural Impact Assessment has been provided with this application. The applicant states they are exploring commissioning a report to understand the cultural impacts of this development and how these can be mitigated.

Effects on Archaeological Values

11. In order to mitigate the adverse effects on archaeological values, a suite of conditions will be required.
12. This has been discussed with the Applicant, and will continue through the application process.

Conclusion

13. If the project is referred, HNZPT anticipates further engagement with the Applicant to ensure all relevant documentation is provided with a substantive application, including:
 - A fulsome archaeological assessment;
 - Appropriate methodologies and strategies proposed;
 - Appropriate draft management plan and research strategy;
 - Evidence of appropriate consultation with tangata whenua; and
 - Appropriate draft conditions.

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Franco Farms
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	NZ Transport Agency		
*First name	Nicola		
*Last name	Foran		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application

The NZ Transport Agency Waka Kotahi (NZTA) thanks the Minister for the opportunity to comment on the referral of this application into the fast-track approvals process.

The applicant has undertaken pre application engagement with NZTA prior to the lodgement of this referral application, including a meeting with the applicant and their consultant on the 23rd of March 2026.

The development does not propose any new access points from the subject sites directly onto the state highway, however it is understood that traffic from the proposed development will gain access to the state highway via the existing roundabout at Candys Road / State Highway 75 (SH75) and the signalised intersection of Halswell Junction Road / SH75.

The zoning of most of the site as Rural Urban Fringe under the Christchurch District Plan and General Rural under the Selwyn District Plan does not anticipate the scale and intensity of urban development proposed. In order to understand the impact of the proposed development on the wider state highway network, NZTA expects that the substantive application includes a comprehensive Integrated Transport Assessment that assesses the potential impact of the development on existing state highway infrastructure.

If the Minister does refer the Project under the section 27 of the Fast Track Approvals Act 2024 (FTAA), NZTA request that:

1. NZTA be invited to comment under section 27(3)(b)(iii) of the FTAA; and

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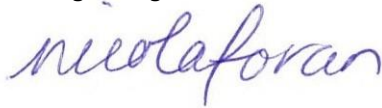
2. The following information be included within any substantive application lodged under section 27(3)(b)(ii):

- a) A comprehensive Integrated Transport Assessment, that includes at a minimum:
- An assessment of the potential adverse safety and operational effects of the development on the immediate and wider transport network (in particular the existing roundabout at Candys Road / State Highway 75 (SH75) and the signalised intersection of Halswell Junction Road / SH75), including details on the method, timing, frequency and duration of traffic movements; and
 - The consideration of mitigation methods, including proposed consent conditions, to manage/mitigate potential adverse effects of the Project on the safety and operation of the state highway network.

NZTA does not have any concerns with this project being referred, and welcomes the opportunity to discuss the proposal further with the Applicant and provide comments on any substantive application in due course.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Nicola Foran

Date 14 July 2026

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Franco Farms project
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Selwyn District Council		
*First name	Geoff		
*Last name	Deavoll		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Delegated signoff

Geoff Deavoll

Principal Planner

Date 14 July 2026

Comments on a fast-track referral application Fast-Track Approvals Act 2024 (FTAA)

Fast-Track Referral Application FTAA-2604-1219 Franco Farms Project

1. General Comment

Selwyn District Council has reviewed the referral application for the Franco Farms project proposed under the FTAA, and the relevant considerations under section 22 subsection (2) of the Act and make the following comments on the application and in response to the specific questions in the invitation to comment.

The project is unique in that it straddles the district boundary, between Selwyn District and Christchurch City, with the larger proportion of the proposed residential development to be located within Christchurch City. As the development is proposed to be serviced from within Christchurch City, including water and wastewater connection and connection to local transport networks. We rely on the comment from Christchurch City Council with regard to whether the project site is infrastructure ready, but we understand that there are existing constraints in the availability of water and wastewater capacity for the site to connect to.

As the site is zoned rural, it is not included in the urban growth overlay within the Partially Operative Selwyn District Plan (PODP). The site is also not subject to wider spatial strategies, including the Greater Christchurch Spatial Plan, which have the aim of coordinating urban growth within the Greater Christchurch area. Given this the project represents unplanned and out of sequence growth, that could lead to inefficient outcomes for residential land development and in the provision of supporting infrastructure. We rely on the comment of Christchurch City Council with regard to whether their housing and business capacity assessment identifies a need for this development in this area, and the significance of the project's benefits regarding increasing the supply of housing.

The application through its economic assessment states that the project to establish 350 residential sites will have a significant economic benefit and will support climate change mitigation. We have no information available to us to verify the claimed benefits.

- 2. Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.**

I can confirm that for the area of the project site that is located within the Selwyn District, there is no record of any application having been lodged with Selwyn District Council that would be in competition with the Franco Farms project if a substantive application for the project was to be lodged.

3. **The project area is located across the territorial boundary shared with Christchurch City Council (CCC), who is also a relevant local authority for this application. With this context, are there any cross-boundary jurisdiction matters that Selwyn District Council consider may affect the delivery of the project?**

Approximately one third of the area of the proposed subdivision is within Selwyn District Council territorial boundary, with a lesser proportion of the residential sites created to be within the Selwyn District. The portion of the site within Selwyn District is dominated by proposed reserve land for stormwater conveyance, attenuation and discharge.

This part of the project site is within the general rural zone in the Partially Operative Selwyn District Plan (PODP) and is not located adjacent or near to any existing township within Selwyn District. Consequentially, there are no services that Selwyn District Council provides in the vicinity that the project can connect to. As the referral application details, there will likely be reliance on the network infrastructure provided by Christchurch City Council to service this development, including the part of the site within the Selwyn District. The application states that agreement would need to be established between the two Councils around servicing of the development with wastewater, water supply, stormwater management and discharge, including future maintenance responsibility for all of these services. Solid waste collection from future residential sites is also a matter that would require agreement to be reached. As part of these required formal agreements consideration will need to be given to how infrastructure is funded, including development contributions and rating of future sites created by the subdivision.

There has been no discussion on the need for these matters to be agreed to date. Should this project be referred, this is matter that would need to be agreed prior to a substantive application being lodged.

4. **Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act).**

I consider that the project does not involve an ineligible activity as defined in section 5 of the FTAA.

5. **Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of Act).**

The project would appear not to engage any of the reasons to decline the application for referral under the FTAA.