

YOUR COMMENT ON THE ŌHOKA RESIDENTIAL SUBDIVISION

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

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		
First name	Brett		
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Home phone / Mobile phone		Work phone	
Email (a valid email address enables us to communicate efficiently with you)	fasttrack@ecan.govt.nz		

2. We will email you draft conditions of consent for your comment			
☐	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

12 October 2026

Expert Panel Chairperson
c/- Emma Fahey
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Tēnā koe Kate,

Section 53 Panel invite to comment on substantive application - Ōhoka Residential Subdivision

Thank you for your email dated 14 September 2026 to comment on Ōhoka Residential Subdivision under sections 53 and 54 of the Fast Track Approvals Act (FTAA).

The Canterbury Regional Council (CRC) has reviewed the application and participated in expert discussions prior to preparing these comments for the Panel's consideration. While undertaking review of the application, CRC technical experts and planners have focused on areas of disagreement or uncertainty rather than restating the applicant's material.

Please find the Canterbury Regional Council's comments attached. To summarise, CRC considers the key outstanding issues relate to the scale and location of the proposed development, its consistency with the planned settlement pattern, and the potential effects on water resources, including groundwater, surface water, stormwater and associated wetlands and waterways. While some effects may be able to be addressed through further information, mitigation and consent conditions, CRC considers that a number of impacts are likely to remain and cannot be addressed through conditions.

CRC has also provided economic commentary on the Applicant's claimed regional and national benefits. CRC considers that the identified adverse impacts are relevant to the Panel's consideration of whether to grant the application, alongside the claimed regional or national benefits of the Project. The overall weighting of the benefits and adverse impacts, including the significance of any residual effects, is ultimately a matter for the Panel to determine having regard to the information provided through the FTAA process.

If you have any questions, please don't hesitate to get in touch. Canterbury Regional Council look forward to continuing to work with the Panel and the Applicant on this project.

Ngā mihi,

Paul Hulse
General Manager Regulatory Implementation

EXECUTIVE SUMMARY

1. In accordance with s53(2)(a) of the Fast-track Approvals Act 2024 (FTAA) Canterbury Regional Council (Council, CRC) has been invited to provide comment on the substantive application for the Ōhoka Residential Subdivision (the Application) lodged by Carter Group Limited (the Applicant).
2. The purpose of this memorandum is to summarise Council's assessment and overall conclusions on the Application to assist the panel in making a decision on the Application under section 81 of the FTAA.
3. The approvals sought are non-complying activities under the relevant regional plans or national environmental standards. The applicant has sought approval for any activity that would be prohibited under any regional plan or national environmental standard.
4. CRC considers that some adverse environmental effects arising from the proposal could be appropriately avoided, remedied, mitigated, or offset/compensated through appropriate conditions of consent. However, there remain a number of significant outstanding matters that cannot be fully addressed through conditions of consent alone. These include matters relating to the economic assessment, consistency with relevant policy direction, and the limited availability of pre-development monitoring data. These matters contribute to uncertainty regarding the potential effects and benefits of the proposal and are considered further throughout this report.
5. Council considers that the key unresolved issues relate to the following:
6. **Uncertainty regarding the economic assessment:** CRC considers that significant uncertainty remains regarding the Applicant's assessment of the economic costs and benefits of the proposal. In particular, CRC's economic expert has identified concerns with the use of economic impact assessments rather than a cost-benefit analysis, the assumptions and counterfactuals underpinning the assessments, and the extent to which project costs, opportunity costs and adverse impacts have been accounted for. CRC considers that an updated economic assessment, preferably in the form of a cost-benefit analysis addressing these matters, would provide a more robust basis for the Panel to assess the significance of the claimed regional and national economic benefits and weigh these against the adverse impacts of the proposal.
7. **Inconsistency with policy direction:** CRC considers that the scale and location of the proposal are inconsistent with the established planning direction for Greater Christchurch. The proposal would result in substantial expansion of Ōhoka onto rural lifestyle-zoned land outside identified urban development areas, with associated implications for urban form, infrastructure, transport, accessibility and established centres. CRC also considers that the proposed loss of natural inland wetlands is inconsistent with the relevant policy direction. These matters arise from the fundamental scale and location of the proposal and cannot, in CRC's view, be appropriately addressed through conditions of consent. The Panel will therefore need to consider these adverse impacts when weighing the proposal against its claimed regional and national benefits.
8. **Limited availability of pre-development monitoring data to inform adverse effects on surface water flows:** CRC considers that there is insufficient pre-development monitoring data to establish a robust baseline for assessing potential effects on surface water flows following development. The Applicant's available flow data is limited to three monitoring dates in 2025 and does not adequately capture the variability in surface water flows or provide a sufficient basis for establishing appropriate triggers and indicators. CRC considers that this uncertainty can be

addressed through further monitoring, including establishing an appropriate baseline before development and continuing monitoring post development, together with appropriate consent conditions to identify and manage adverse effects.

9. **Water supply feasibility and associated stream depletion and drawdown effects:** CRC considers that uncertainty remains regarding the potential groundwater effects associated with the proposed Community Water Supply, including the parameters used in the water balance and drawdown assessments. While further testing, monitoring and conditions can address some of this uncertainty, the proposed continuous water supply is also likely to result in localised and persistent hydrological changes, including additional stream depletion in an already overallocated waterway. CRC therefore considers that appropriate testing including step and aquifer testing of the proposed bores to establish appropriate aquifer parameters, together with an updated drawdown assessment, monitoring and clearly defined triggers and indicators will be necessary to identify and manage effects that are greater than anticipated. The extent and environmental significance of these effects will remain relevant to the Panel's consideration of the proposal as a whole.
10. **Management of effects to address loss of wetlands and waterways within the site:** CRC considers that the proposed management of effects associated with the loss of approximately 3.7 hectares of wetlands and approximately 2,144 metres of stream length requires further development. The Applicant has not currently demonstrated that the wetland loss will be replaced on a 1:1 basis, and CRC's freshwater ecology expert considers that the proposed mitigation and offsetting package does not adequately demonstrate that the ecological effects associated with the loss and modification of waterways will be addressed. CRC considers that further development and quantification of the proposed replacement, offsetting and/or compensation measures, together with appropriate conditions securing their implementation and ongoing management, are required before the adequacy of the final package can be determined.
11. **Management of contaminated land including soil reuse:** CRC considers that matters relating to contaminated land remain outstanding, particularly the incomplete investigations of farm dump areas and potentially infilled waterways and the resulting uncertainty regarding the remediation required. CRC supports the proposed reuse of suitable soil within the site but considers that the proposed soil reuse criteria are not sufficiently protective of groundwater and surface water receptors. CRC considers that these matters can be addressed through further information and conditions requiring the Remediation Action Plan and a Soil Management Plan, together with appropriate soil reuse criteria, to be provided and implemented as part of the consenting process.
12. **Effects of stormwater discharges on surface water quality and ecology:** CRC considers that the potential effects of the proposed construction- and operational-phase stormwater discharges on surface water quality and aquatic ecosystems have not yet been adequately addressed. CRC's water quality expert has identified potential effects including changes in water clarity and colour, sediment deposition and contaminant exceedances, with uncertainty remaining regarding the frequency and significance of these effects, particularly under summer low-flow conditions. CRC considers that these effects can potentially be addressed through appropriate monitoring, management measures and consent conditions, including sediment quality monitoring and clearly defined triggers and indicators requiring further action where adverse effects are identified. The adequacy of the final management framework will be relevant to the Panel's consideration of the overall adverse effects of the proposal.
13. **Stormwater Design:** CRC's stormwater experts have identified outstanding matters regarding the proposed stormwater design, including discharge rates and volumes,

stormwater modelling assumptions, tailwater effects, SMA design, and the relationship between groundwater levels and the proposed infrastructure. These matters create uncertainty as to whether the system will achieve the required stormwater quality and quantity outcomes and, if unresolved, could result in adverse effects on downstream receiving environments. CRC considers these matters can be addressed through further information, refinement of the design, and amendments to the consent conditions, including a requirement for the final design to be peer reviewed before construction.

14. CRC is committed to continuing to work with the relevant parties on conditions for areas where there is sufficient information.
15. CRC considers that the proposal is inconsistent with the relevant policy framework under the RMA, that this should be taken into account by the Panel¹, and does not achieve the purpose of the RMA stated in Part 2.
16. CRC considers that the Application raises a number of significant outstanding matters that cannot be fully addressed through conditions of consent alone. These include uncertainty regarding the economic assessment, the consistency of the proposal with relevant policy direction, and the limited availability of pre-development monitoring data to inform the assessment of potential effects on surface water arising from the development.

There are also a number of adverse effects associated with the proposal which, while potentially significant based on the information currently available, CRC considers could be appropriately avoided, remedied, mitigated, or offset/compensated through appropriate conditions of consent. These include effects associated with water resources, wetlands and waterways, transport, and other matters identified throughout this report. The extent to which these effects can be appropriately managed will depend on the final form and adequacy of the proposed conditions.

CRC considers that the significant outstanding matters identified above, together with the adverse effects of the proposal and the claimed regional and national benefits, need to be considered when assessing whether the Application meets the purpose of the FTAA. CRC considers that the overall weighting of these matters is for the Panel to determine, having regard to the information currently available and any further information provided by the Applicant.

INTRODUCTION

17. This memorandum is structured in the following way:
 - a. EXECUTIVE SUMMARY
 - b. INTRODUCTION
 - c. REGIONAL OR NATIONAL BENEFITS
 - d. ASSESSMENT OF EFFECTS
 - e. POLICY ASSESSMENT
 - f. OTHER MATTERS

¹Schedule 5, clause 17(2) FTAA

- g. CONSENT CONDITIONS
 - h. WHEN AN APPROVAL MUST OR MAY BE DECLINED
 - i. CONCLUSIONS
18. This memorandum has been prepared in response to the original substantive application lodged with the Environmental Protection Agency (EPA) on 1 July 2026 and the updated application material submitted to the EPA on 10 September 2026.
19. These substantive application documents reviewed are as follows:
- a. Appendix 2 - Economics Benefit Assessment - Market Economics
 - b. Appendix 3 - Record of Consultation with Canterbury Regional Council
 - c. Appendix 9 - Section 30 Notice from Canterbury Regional Council
 - d. Appendix 13 - Detailed Site Investigation and Supplementary - Tetra Tech Coffey & EHS Support NZ
 - e. Appendix 16 - Assessment of Potential Loss of Productive Land - Reeftide
 - f. Appendix 17(a) - Groundwater & Water Supply Assessment - Pattle Delamore Partners
 - g. Appendix 17(b) - Water Supply Well Interference Output Final all
 - h. Appendix 19(a) - Aquatic Ecology Assessment - Instream
 - i. Appendix 19(b) - Aquatic Ecology Addendum - Stantec
 - j. Appendix 20 - Hydrology Assessment - Pattle Delamore Partners
 - k. Appendix 21 - Wetland Assessment - Pattle Delamore Partners
 - l. Appendix 22 - Flood Assessment - Pattle Delamore Partners (Updated - 10 September 2026)
 - m. Appendix 26 - Scheme Plans (Updated - 10 September 2026)
 - n. Appendix 29 - Water Supply Strategy - Inovo Projects (Updated - 10 September 2026)
 - o. Appendix 29(a) - Appendix A of water supply strategy
 - p. Appendix 29(b) - Appendix B of water supply strategy
 - q. Appendix 30 - Site Management Plan
 - r. Appendix 31 - Stormwater Management Report - Pattle Delamore Partners (Updated - 10 September 2026)
 - s. Appendix 32(a) - Dewatering & dust suppression assessment
 - t. Appendix 32(b) - Dewatering well interference Appendix H and I assessments
 - u. Appendix 33 - National planning instruments compliance assessment
 - v. Appendix 36 - Canterbury land and water regional plan compliance assessment
 - w. Appendix 39 - Economic costs assessment
 - x. Appendix 42 - Provisions assessment
 - y. Appendix 44 - Proposed Regional consent conditions (Updated - 5 August 2026)

- z. Appendix 47 - Watercourse and wetland changes plans (Updated - 10 September 2026)
- 20. The following supplementary documents submitted to the EPA on 10 September 2026 have also been reviewed:
 - a. Change in water balance assessment
 - b. Construction earthworks spring and groundwater monitoring plan (Groundwater and Spring Flow Monitoring Plan)
 - c. Appendix 17c - Water supply memorandum
 - d. Appendix 19c - Aquatic Ecology memorandum
- 21. Technical assessments have been undertaken by CRC's technical experts and external technical experts. These are attached as follows:
 - a. Appendix 3 - Technical Advice Request - s53 - Contaminated Land
 - b. Appendix 4 - Technical Advice Request - s53 - Economics
 - c. Appendix 5 - Technical Advice Request - s53 - Groundwater Resources
 - d. Appendix 6 - Technical Advice Request - s53 - Land Ecology
 - e. Appendix 7 - Technical Advice Request - s53 - Land Resources
 - f. Appendix 8 - Technical Advice Request - s53 - Planning
 - g. Appendix 9 - Technical Advice Request - s53 - Stormwater Engineering
 - h. Appendix 10 - Technical Advice Request - s53 - Surface Water Resources
 - i. Appendix 11 - Technical Advice Request - s53 - Water Quality and Ecology

Consultation

- 22. Consultation between CRC and the Applicant commenced prior to lodgement of the substantive application and has been ongoing throughout the process. Internally, CRC staff have met to discuss the application to provide an opportunity for staff across different relevant disciplines to raise questions, identify issues and provide comments within their respective areas of expertise. Wherever appropriate to do so, CRC have communicated these questions, issues or comments back to the Applicant.
- 23. CRC have also been in communication with the Department of Conservation (DOC) to better understand ecological issues, as well as Te Rūnanga o Ngāi Tahu, and Whitiara Centre Limited (providing advice on behalf of Te Rūnanga o Ngāi Tūāhuriri) in order to understand the opinion of papatipu rūnanga on the proposal.

REGIONAL OR NATIONAL BENEFITS

- 24. The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. When taking into account the purpose of the FTAA the panel must consider the extent of the project's regional or national benefits.
- 25. To assist the Panel, Council has considered:
 - a. The positive effects of the Application;
 - b. Whether the positive effects are regionally or nationally significant.

Positive Effects

26. The Applicant considers that the proposal will result in the following positive effects:
- a. Increase in house supply for the Waimakariri District including retirement living.
 - b. Location specific demand for residential living in Ōhoka.
 - c. Approximately \$400 million in regional economic value associated with the construction of the development.
 - d. Contribution of \$24 million in regional value once the local centre is established.
 - e. Efficient use of existing and planned infrastructure.
 - f. Transition of land use to reduce nutrient and E. Coli discharges to freshwater.
 - g. Enhancement of waterway corridors, open space, and recreational access.
 - h. Development of recreational facilities.
27. CRC acknowledges that the proposal is likely to result in some limited positive effects identified by the Applicant. However, CRC does not agree with all of the positive effects claimed or their significance. Further commentary on the claimed positive effects, including the economic benefits, is provided below.

Regional or National Significance

28. The FTAA does not contain a definition of significant regional or national benefits. However, in relation to a referral application, s22(2) identifies a number of criteria that the Minister may consider when determining whether a project is an infrastructure or development project that would have significant regional or national benefits.
29. Council has given consideration to these matters in forming a view on whether the positive effects likely to result from the application are of regional or national significance.
30. Council has not relied on the fact that this Application is a listed project in Schedule 2 of the FTAA as evidence of significance regional or national benefits.
31. CRC consider the following criteria from s22(2) of the FTAA relevant to the assessment of the proposal:
- a. **Section 22(2)(a)(iii)** – will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of Policy 1 of the National Policy Statement on Urban Development 2020).
 - i. CRC acknowledges that the proposal will increase the supply of housing. However, CRC's economic expert disputes aspects of the Applicant's assessment regarding the timing and need for the additional housing supply. CRC's planning expert also does not agree that the development will contribute to a well-functioning urban environment. Further details regarding these matters are provided in Appendices 4 and 8.
 - b. **Section 22(2)(a)(iv)** – will deliver significant economic benefits.
 - i. CRC has reviewed the economic benefits and costs assessments provided as part of the substantive application. While CRC acknowledges that the proposal is likely to generate some economic benefits, there are shortcomings in the assessments, which are discussed in greater detail in Appendix 4. CRC also considers that the claimed benefits have not been adequately assessed against an appropriate regional or national benchmark.

Further assessment of this matter is necessary to ensure that the Panel is fully informed when considering the significance and appropriate weighting to be given to the claimed economic benefits.

- c. **Section 22(2)(a)(x)** – is consistent with local or regional planning documents, including spatial strategies.
 - i. The proposal is not consistent with the planned settlement pattern identified in the CRPS and GCSP. The scale and location of the proposed development would represent a substantial expansion of Ōhoka onto rural lifestyle-zoned land and would contribute to a more dispersed urban form outside the specific areas identified for urban growth.
32. Based on the information provided by the Applicant and CRC's assessment of the relevant matters, CRC considers that the proposal may have the potential to result in the following regionally significant benefits. However, the extent to which these benefits would be realised, and whether they are of regional significance, remains uncertain based on the information currently available:
- **Increased housing supply:** CRC acknowledges that the project would increase the supply of housing, consistent with s22(2)(a)(iii) of the FTAA. However, the extent to which the additional housing represents a regionally significant benefit remains uncertain, particularly having regard to the timing and need for the additional housing supply. These matters are considered further in Appendix 4.
 - **Economic benefits:** CRC acknowledges that the proposal is likely to generate some economic benefits, consistent with s22(2)(a)(iv) of the FTAA. However, the extent and significance of those benefits at a regional or national level remain uncertain, given the shortcomings identified in the Applicant's economic assessment and the absence of an appropriate regional or national benchmark. These matters are considered further in Appendix 4.

PROVISIONS OF RMA THAT DIRECT DECISION MAKING (SCHEDULE 5, CLAUSE 17(2) FTAA)

Regional Consents Sought

33. The Applicant seeks approvals under the FTAA for the following regional consents:

Table 1. Regional Consents Sought

National Planning Instruments
National Environmental Standards for Freshwater (amended 2025)
Part 3 Standards for other activities that relate to freshwater
Subpart 2 - Reclamation of rivers
57 Discretionary activities
(2) A resource consent for a discretionary activity under this regulation must not be granted unless the consent authority has first—
(a) satisfied itself that there is a functional need for the reclamation of the river bed in that location; and
(b) applied the effects management hierarchy.

Canterbury Land and Water Regional Plan	
5.1 - 5.6 Region-wide Rules: General Rules	
5.6 Any activity that— (a) would contravene sections 13(1), 14(2), s14(3) or s15(1) of the RMA; and (b) is not a recovery activity; and (c) is not classified by this Plan as any other of the classes of activity listed in section 87A of the RMA	D
5.93A - 5.97 Region-wide Rules: Stormwater	
Reticulated Stormwater Systems	
5.93 The discharge of stormwater or construction-phase stormwater from a reticulated stormwater system onto or into land or into or onto land in circumstances where a contaminant may enter water, or into groundwater or a surface waterbody that meets the conditions under this rule.	RD
Construction-phase stormwater not discharged from a Reticulated Stormwater System	
5.94B The discharge of construction-phase stormwater, other than into or from a reticulated stormwater system, into a surface waterbody, or onto or into land in circumstances where a contaminant may enter groundwater or surface water, that does not meet one or more of the conditions of Rule 5.94A.	RD
5.98 - 5.100 Region-wide Rules: Other Minor Contaminant Discharges	
5.100 Any discharge that is not permitted by either Rule 5.98 or 5.99 and is not classified by any other rule in this Plan.	D
5.103 - 5.110 Region-wide Rules: Bores	
5.105 The use of land, including the bed of a lake or river, for the installation, maintenance and use of a bore or a water infiltration gallery that does not meet one or more of the conditions in Rule 5.103, or 5.104 or 5.104A.	D
5.111 - 5.115 Region-wide Rules: Small and Community Water Takes	
5.115 The taking and using of water for a community water supply from groundwater or surface water that meets the conditions under this rule.	RD
5.119 - 5.120 Region-wide Rules: Site Dewatering - Groundwater	
5.120 The taking of water from groundwater for the purpose of de-watering for carrying out excavation, construction, maintenance and geotechnical testing and the associated use and discharge of that water that does not meet one or more of the conditions in Rule 5.119.	RD

5.123 - 5.127 Region-wide Rules: Take and Use Surface Water	
5.127 The non-consumptive taking and use of water from a lake, river or artificial watercourse and discharge of the same water to the same lake, river or artificial watercourse that does not meet one or more of the conditions in Rule 5.126.	NC
5.128 - 5.132 Region-wide Rules: Take and Use Groundwater	
5.132 The non-consumptive taking and use of ground water and associated discharge to groundwater that does not meet one or more of the conditions in Rule 5.131.	D
5.135 - 5.141B Region-wide Rules: Structures	
5.141A The placement, installation, erection, reconstruction, alteration or removal of any structure, excluding dams, on, in or under the bed of a lake or river, and including any associated excavation, disturbance, diversion and discharge in the bed of a lake or river, or any diversion or discharge in an artificial watercourse, that does not comply with Rules 5.135 to 5.141.	D
5.159 - 5.162 Region-wide Rules: Wetlands	
5.162 Reducing the area of a wetland by the taking, use, damming or diversion (including draining) of water or other means, including vegetation clearance, cultivation, burning or earthworks, except as provided for in Rule 5.161.	NC
5.167 - 5.169 Region-wide Rules: Earthworks and Vegetation Clearance in Riparian Areas	
5.169 Vegetation clearance and earthworks outside the bed of a river or lake or adjacent to a wetland boundary but within: (a) 10 m of the bed of a lake or river or a wetland boundary in Hill and High Country land and land shown as High Soil Erosion Risk on the Planning Maps; or (b) 5 m of the bed of a lake or river or a wetland boundary in all other land not shown as High Soil Erosion Risk on the Planning Maps or defined as Hill and High Country; and any associated discharge of sediment or sediment-laden water in circumstances where sediment may enter surface water that does not comply with one or more of the conditions in Rules 5.167 or 5.168.	RD
5.175 - 5.178 Region-wide Rules: Earthworks over Aquifers	
5.176 The use of land to excavate material that does not comply with one or more of the conditions of Rule 5.175.	RD

Section 8 Waimakariri	
Take and Use Groundwater	
8.5.12 The taking and use of groundwater, provided it meets the conditions under this rule.	RD

Assessment of Impacts

Effects on Cultural Values, Practices, and Beliefs

34. CRC notes that Te Rūnanga o Ngāi Tahu, Te Ngāi Tūāhuriri Rūnanga, and Whitiara Centre Limited are also parties invited to provide comment on this proposal and as such, CRC has not undertaken a detailed assessment of the potential adverse effects that the proposal may have on cultural values, practices, and beliefs. This is not to diminish the importance of these effects, but to recognise that it is for mana whenua to determine how a proposal impacts on their cultural values.

Adverse Effects

35. CRC has reviewed the application, with findings of this review documented in Appendix 1. The table in Appendix 1 captures the Applicant's assessment (summarised), CRC's assessment (summarised) and any of CRC's recommended solutions and/or conditions. Detailed technical advice provided by CRC experts is included where appropriate in Appendices 3 to 11.
36. In summary, CRC considers the following issues that are relevant to the potential benefits of the proposal and/or give rise to potentially significant adverse impacts, are matters for the Panel to determine, with further discussion beyond the summary in Appendix 1 provided below:
- Uncertainty regarding the economic assessment;
 - Inconsistency with policy direction; and
37. Further, there are some matters where agreement between the Applicant and CRC's experts has not yet been reached, and it is possible that agreement may not ultimately be reached. CRC considers that, while these matters may involve potentially significant adverse effects, they could be appropriately addressed through conditions of consent. Specifically:
- Limited availability of pre-development monitoring data to inform adverse effects on surface water flows
 - Water supply feasibility and associated stream depletion and drawdown effects;
 - Management of effects to address loss of wetlands and waterways within the site;
 - Management of contaminated land including soil reuse;
 - Effects of stormwater discharges on surface water quality and ecology; and
 - Stormwater design
38. The extent to which these effects can be appropriately addressed will depend on the final form and adequacy of the proposed conditions.

Issue 1 – Uncertainty regarding the economic assessment

39. Dr Meade's principal areas of disagreement with the Applicant's economic assessment relate to the use of economic impact assessments (EIAs), rather than the use of a cost-benefit analysis (CBA), which he considers is required under the FTAA; insufficient information regarding the types of housing and other capacity proposed and the market segments to be served; materially different counterfactuals relied upon in the M.E and Savvy analyses, which affect the extent to which the Project represents additional growth; the failure to adequately account for Project costs, opportunity costs and adverse impacts; and the reliance on approaches that he considers overstate the Project's economic impacts and benefits. Dr Meade considers that these limitations, together with the absence of a clear regional or national benchmark, mean that the analyses do not substantiate significant regional or national benefits from the Project. The detailed technical advice supporting CRC's position is provided in Appendix 4.
40. CRC considers that the Applicant could provide an updated economic assessment in the form of a CBA that also addresses the other matters raised above. This would provide a more robust basis for assessing the economic costs and benefits of the Project, including the extent to which any benefits are significant at a regional or national level. This information would assist the Panel in weighing the economic benefits of the Project against its adverse effects and other relevant matters when considering whether to grant or decline the Application in accordance with the statutory framework of the FTAA.

Issue 2 – Inconsistency with policy direction

41. CRC considers that the scale and location of the proposal are inconsistent with the established planning direction for Greater Christchurch. CRPS Objectives 6.2.1 and 6.2.2 and Policies 6.3.1, 6.3.5 and 6.3.7 seek to achieve a consolidated and integrated urban form by avoiding unplanned urban expansion, directing growth to identified areas, coordinating development with infrastructure, and avoiding adverse effects on the function and viability of established centres. The GCSP reinforces this approach by directing growth to identified development areas alongside urban intensification and supporting integrated transport networks and a strengthened network of centres. The detailed technical advice supporting CRC's position is provided in Appendix 8.
42. The proposal seeks to provide approximately 800 additional residential lots on rural lifestyle-zoned land, compared with approximately 250 existing households in Ōhoka. CRC considers that the scale and location of the proposal would result in a substantial expansion of the existing settlement rather than incremental growth within the planned urban areas. This has the potential to contribute to a more dispersed urban form and place additional pressure on transport and infrastructure networks, travel patterns, access to services, and the function and viability of established centres.
43. The proposal would also involve the infilling and drainage of approximately 3.7 hectares of natural inland wetlands. The Applicant has identified 15 wetlands within the development site as meeting the criteria for natural inland wetlands under the NPS-FM. CRC considers that the proposed loss of these wetlands is inconsistent with the direction of CLWRP Policy 2A.3, which provides for the protection and avoidance of the loss of extent of natural inland wetlands and limits the circumstances in which their loss, including through infilling or drainage, can occur. CRC is also not currently satisfied that the proposed mitigation, offsetting and compensation measures adequately demonstrate how no net loss of wetland extent and values will be achieved, consistent with NPS-FM Policy 6. The scale and nature of the proposed wetland loss, and the location of the wetlands within an area not identified for urban development,

are relevant to the assessment of whether the proposal is consistent with this policy direction.

44. The proposal would also involve the loss and modification of waterways within the development site. CRC is not currently satisfied that the proposed mitigation, offsetting and compensation measures adequately demonstrate how the loss of river extent and values will be addressed, consistent with NPS-FM Policy 7. The adequacy of these measures, including whether they appropriately address the extent and values of the affected waterways, remains relevant to the Panel's assessment of the proposal.
45. The location of the proposal is also inconsistent with the transport and accessibility outcomes sought by the planning framework. CRPS Policy 6.3.4 seeks development patterns that support increased uptake of active and public transport and provide opportunities for modal choice, while NPS-UD Policy 1 identifies good accessibility between housing, employment, community services and open spaces, including through active and public transport, as a characteristic of a well-functioning urban environment. The location and scale of the proposal, including its limited access to public transport, are likely to increase reliance on private vehicle travel and limit opportunities for modal choice.
46. CRC considers that these matters represent significant adverse effects arising from out of sequence development and inconsistency of the proposal with the relevant planning direction. CRC does not consider that there is a practicable solution to address these inconsistencies through conditions of consent, given the fundamental relationship between the scale and location of the development, the planned settlement pattern, and the proposed loss of natural inland wetlands. These matters are therefore for the Panel to consider when weighing the regional and national benefits of the proposal against its potential adverse impacts and other relevant matters under the FTAA.

Issue 3 – Limited availability of pre-development monitoring data to inform adverse effects on surface water flows

47. CRC's surface water resources expert, Ms Just has reviewed the updated information provided by the Applicant and considers that gaps remain in the assessment of potential effects on surface water flows. In particular, the Applicant's pre-development gauging is temporally limited, with flow data provided for only three dates in 2025. As a result, there is insufficient information to establish an appropriate baseline against which changes in spring flows following development can be assessed, or to understand the variability in surface water flows and determine appropriate triggers and indicators for identifying and managing adverse effects. The detailed technical advice supporting CRC's position is provided in Appendix 10.
48. CRC considers that updates to the Groundwater and Spring Flow Monitoring Plan are required through Condition 12 of CRC270953. CRC proposes that the condition require a temporary water level recorder to be installed immediately if consent is granted, with the recorder used alongside flow gaugings to establish an appropriate baseline for comparison between pre- and post-development conditions. Further information and monitoring will be required before there is sufficient information to understand the potential effects of the proposal and identify appropriate triggers or indicators.
49. CRC considers that the limited availability of pre-development monitoring data creates uncertainty regarding the potential effects of the proposal on surface water flows. While this matter can be addressed through further monitoring and appropriate consent conditions, CRC acknowledges that the proposed monitoring requirements by CRC in

the paragraph above may be considered more onerous in the context of the FTAA. Section 83 of the FTAA provides that a condition must not be more onerous than necessary to address the reason for which it is imposed. CRC considers that the proposed monitoring is necessary to establish a sufficiently robust baseline, given the limited temporal extent of the existing data, and to provide an appropriate basis for identifying and managing any adverse effects arising from the development. CRC therefore considers that the proposed monitoring requirements are necessary and proportionate to address the uncertainty associated with the potential effects on surface water flows.

Issue 4 – Water supply feasibility and associated stream depletion and drawdown effects

50. CRC's groundwater expert, Ms Aitchison-Earl, has reviewed the updated information provided by the Applicant and considers that uncertainty remains regarding the potential groundwater effects associated with the proposed Community Water Supply. In particular, the parameters used in the Water Balance assessment remain uncertain and have not been tested for sensitivity. CRC's expert considers that further certainty regarding these parameters can be obtained through step and/or aquifer testing of the proposed bores, although some uncertainty is likely to remain. The detailed technical advice supporting CRC's position is provided in Appendix 5.
51. CRC considers that the proposal is likely to result in unavoidable, localised changes to hydrology in certain areas. These changes may arise from a combination of the proposed Community Water Supply and other activities associated with the development, including subsoil drainage, construction dewatering and dust suppression takes. The Applicant proposes to retain the existing irrigation consents during the development period but has proposed conditions restricting the use of those consents at times when development-related takes are occurring, to avoid overlapping effects. The irrigation consents are proposed to be surrendered once the development is established, which would remove the associated irrigation stream-depletion effects thereafter.
52. The proposed Community Water Supply would operate continuously throughout the year, meaning that its associated stream-depletion effect would persist year-round, including outside the irrigation season. The Ōhoka Stream, including its tributaries, is currently overallocated, which is relevant to the consideration of any additional takes further contributing to stream depletion and compounding an already over allocated stream. Given the continuous nature of the proposed water supply, ceasing the take would not be a practical means of managing the effect, and Ms Aitchison-Earl considers that the effects are likely to become steady and persist over the long term. CRC considers that the precise nature, extent and magnitude of the resulting hydrological changes cannot be determined with certainty before the development occurs. Accordingly, appropriate monitoring and clear triggers or indicators will be important to identify whether actual effects are greater than anticipated and whether further investigation or management is required.
53. CRC agrees with the Applicant's proposed conditions requiring step and aquifer testing once the new bores have been drilled. However, CRC considers that the results of this testing are likely to affect the parameters used in the assessment of drawdown effects. Accordingly, the results should be used to update the drawdown assessment of nearby bores, rather than relying on the assessment in the updated Water Supply Memo. CRC proposes that the updated assessment be submitted to CRC for certification before the new bores become operational for the Community Water Supply, to demonstrate

compliance with Schedule 12 of the CLWRP and confirm that the proposed takes will not adversely affect existing nearby bores.

54. CRC considers that the remaining uncertainty regarding the water supply assessment and the potential drawdown effects can be further addressed through additional testing, monitoring and appropriate consent conditions. However, some localised changes to hydrology are likely to occur if the development proceeds. These effects cannot be appropriately managed without clearly defined triggers and indicators to identify when actual groundwater or surface water changes exceed those anticipated and when further investigation or management is required. The extent and environmental significance of these effects, including the stream-depletion effects associated with the continuous Community Water Supply, are therefore matters for the Panel to consider when weighing the adverse impacts of the proposal against its claimed regional and national benefits.

Issue 5 – Management of effects to address loss of wetlands and waterways within the site

55. CRC's land ecology and freshwater ecology experts Dr Jack and Dr Ausseil have reviewed the updated information provided by the Applicant and consider that the proposed management of effects associated with the loss of wetlands and waterways requires further development. The proposal would result in the loss of approximately 3.7 hectares of wetlands and approximately 2,144 metres of stream length. CRC's land ecology expert considers that the Applicant has not currently demonstrated that the loss of wetland extent will be replaced on a 1:1 basis, as recommended in the Applicant's own Wetland Assessment. The detailed technical advice supporting CRC's position in relation to wetlands is provided in Appendix 6 and for waterways in Appendix 11.
56. In relation to the loss of stream extent, Dr Ausseil considers that the proposed mitigation and offsetting package does not adequately address the potential ecological effects of the proposal or the net loss of stream extent. In particular, the expert considers that the current assessment does not adequately account for additionality, time lags or potential double counting of mitigation measures, or quantify the losses and gains using an established methodology such as Stream Ecological Valuation (SEV). Dr Ausseil also identifies that approximately 560 metres of the streams proposed to be retained would themselves be subject to direct loss, realignment and other effects associated with the development. CRC therefore considers that the proposed package does not currently demonstrate that the ecological effects associated with the loss and modification of waterways will be appropriately addressed.
57. CRC considers that further detail is required to demonstrate how the proposed wetland replacement and stream offsetting and/or compensation measures will address the extent and ecological effects of the proposed losses. For streams, CRC considers that additional measures, which could include riparian buffers, wetlands and habitat improvements, may be required to address effects on retained streams as well as the loss of stream extent. CRC also considers that the final package of measures should be appropriately quantified and secured through conditions of consent, including requirements for implementation and ongoing management.
58. CRC considers that the matters identified by its ecological experts could potentially be addressed through further development of the proposed management and appropriate conditions of consent. However, based on the information currently available, CRC is

not satisfied that the proposed measures adequately address the loss of wetlands and waterways. The adequacy, extent and effectiveness of the final management package will therefore need to be considered when assessing the overall adverse impacts of the proposal.

Issue 6 – Management of contaminated land including soil reuse

59. CRC's contaminated land expert, Dr Mirabueno has reviewed the updated information provided by the Applicant and considers that matters relating to the management of contaminated land remain outstanding. In particular, investigations of the farm dump areas and potentially infilled waterways remain incomplete, and the remedial actions required in those areas cannot be fully determined until the outcomes of those investigations are known. CRC therefore considers that the Remediation Action Plan (RAP) should be provided and considered as part of the FTAA process, rather than being deferred until commencement of works as currently proposed by the Applicant. The detailed technical advice supporting CRC's position is provided in Appendix 3.
60. CRC supports the Applicant's proposal to reuse suitable soil within the site, as this would reduce the need for imported fill. However, CRC considers that the proposed criteria for determining whether soil is suitable for reuse are not sufficiently protective of groundwater and surface water receptors during the operational phase, particularly given the high groundwater levels across the site. CRC considers that further information is required regarding the proposed soil reuse criteria, where reused soil would be placed, and the soil testing regime. CRC's expert considers that the Australian and New Zealand Guidelines Default Guideline Values (ANZG DGV) values and the adopted values in Table C-3 Technical Disposal to Land (WasteMINZ, 2023) would provide more appropriate criteria for soil reuse.
61. CRC considers that the outstanding contamination investigations and the appropriateness of the proposed soil reuse criteria create uncertainty regarding how contaminated land will be managed during and following development. CRC considers that these matters can be appropriately addressed through further information and appropriate conditions of consent, including requiring the RAP to be provided as part of the FTAA process and requiring a Soil Management Plan to establish the requirements for soil testing, reuse and placement. CRC therefore considers that the final conditions should secure the implementation of the RAP and Soil Management Plan and specify appropriate soil reuse criteria.

Issue 7 – Effects of stormwater discharges on surface water quality and ecology

62. The Applicant has provided an assessment of the potential effects of construction- and operational-phase stormwater discharges on the waterways receiving those discharges. CRC's water quality expert Dr Ausseil considers that the proposed discharges may result in conspicuous changes in water clarity and colour, sediment deposition and associated ecological effects, with the greatest risk occurring in the small, predominantly spring-fed receiving channels. Dr Ausseil also considers that the discharges are likely to result in exceedances of the CLWRP zinc limit and ANZG guidelines for 95% species protection at times. The detailed technical advice supporting CRC's position is provided in Appendix 11.
63. CRC considers that there remains uncertainty regarding the frequency and significance of these potential effects. In particular, Dr Ausseil considers that the dilution assessment is not environmentally conservative, particularly under summer low-flow conditions, and that further information is required to understand the potential

effects of the proposed discharges under these conditions. CRC therefore considers that the potential for adverse effects on surface water quality and aquatic ecosystems has not yet been adequately addressed.

64. CRC considers that these effects could potentially be addressed through appropriate monitoring and conditions of consent. CRC proposes monitoring conditions requiring assessment of sediment quality following several years of operation of the stormwater discharges, together with clearly defined triggers or indicators requiring further action where adverse effects are identified. CRC has also proposed changes to the operational-phase stormwater discharge conditions in consent CRC270960, with corresponding updates potentially required to the Streamworks Management Plan, Ecological Management Plan and Stormwater Management Plan.
65. CRC considers that the final monitoring and management framework should provide sufficient information to identify whether the actual effects of the stormwater discharges are consistent with those anticipated by the Applicant and to require further investigation or management where they are not. The adequacy of the proposed conditions, including the monitoring requirements and triggers or indicators, will therefore be relevant to the Panel's consideration of whether the potential effects on surface water quality and ecology can be appropriately managed.

Issue 8 – Stormwater design

66. CRC's stormwater experts have identified a number of outstanding matters relating to the proposed stormwater design, including uncertainty regarding post-development discharge rates and volumes, the assumptions underpinning the stormwater calculations, the assessment of tailwater effects, the design of stormwater management areas (SMAs), and the relationship between groundwater levels and the proposed infrastructure. These matters create uncertainty as to whether the proposed stormwater system can achieve the intended stormwater quality and quantity outcomes. If not appropriately addressed, the resulting discharges and changes to flow could give rise to significant adverse effects on receiving environments, including downstream watercourses.
67. CRC considers that these matters could be addressed through the provision of further information to confirm and refine the stormwater design, together with appropriate amendments to the proposed conditions of consent. In particular, CRC considers that the conditions should require the stormwater design to be updated and supported by a peer review prior to construction, to confirm that the system can achieve the required stormwater quality and quantity outcomes and that the identified matters have been adequately addressed. The adequacy of the final design and the effectiveness of the proposed conditions will be important in ensuring that the potential adverse effects of stormwater discharges are appropriately managed.

Policy Assessment

68. The Application provides a relatively high-level consideration of the relevant statutory planning documents at the Statutory Context section of the AEE. While CRC agrees with aspects of the Applicant's assessment, the key areas where CRC's assessment differs are identified and discussed above under **Issue 2 – Inconsistency with policy direction** while also been covered in further detail in Appendix 8.

Compensation (S104(1)(ab) RMA)

69. CRC has considered the proposed offsetting and/or compensation measures in relation to the residual adverse effects of the proposal. CRC does not currently consider that the proposed package appropriately addresses all residual adverse effects. The package remains subject to further discussion and refinement. Should the Applicant provide additional offsetting and/or compensation measures to address the residual adverse effects, CRC will provide further comment on the appropriateness of the overall package once those measures have been further developed.

OTHER MATTERS

70. FTAA Schedule 5 Clause 17(1)(b) includes taking into account any other matter the consent authority considers relevant and reasonably necessary to determine the application as provided for in RMA s104(1)(c).
71. The Panel has also invited comments on the following specific matters, CRC provides their response to these directly below:
1. *Strategic urban form: The relationship of the proposal with the planned settlement pattern under the Canterbury Regional Policy Statement, Greater Christchurch Spatial Plan and district planning framework; and any effects of accommodating substantial urban growth at Ōhoka rather than in identified growth areas.*
 - a. CRC considers that the scale and location of the proposal are inconsistent with the established planning direction for Greater Christchurch. CRPS Objectives 6.2.1 and 6.2.2 and Policies 6.3.1, 6.3.5 and 6.3.7 seek to achieve a consolidated and integrated urban form by avoiding unplanned urban expansion, directing growth to identified areas, coordinating development with infrastructure, and avoiding adverse effects on the function and viability of established centres. The GCSP reinforces this approach by directing growth to identified development areas alongside urban intensification, integrated transport networks and a strengthened network of centres.
 - b. The proposal would accommodate substantial urban growth at Ōhoka outside the identified growth areas. CRC considers that this needs to be considered in the context of the planned settlement pattern for Greater Christchurch, including the implications for infrastructure provision, transport and accessibility, the function and viability of established centres, and the ability to achieve an integrated urban form. Dr Meade's economic assessment (Appendix 4) considers that growth accommodated at Ōhoka would largely be displaced from other locations within the region rather than representing wholly additional growth. The relevant comparison is therefore between the economic outcomes of accommodating growth at Ōhoka and those associated with the likely alternative development locations.
 - c. CRC's economic assessment considers that this comparison should account for both the benefits of development at Ōhoka and the benefits and efficiencies that may be forgone elsewhere, including differences in infrastructure, transport and accessibility, commercial activity and community services. While the information provided considers whether the revised proposal can be serviced, it does not demonstrate that the lifecycle costs and benefits of accommodating equivalent growth at Ōhoka are preferable to those associated with the planned alternative locations. The detailed

technical advice supporting CRC's position is provided in Appendix 4 (Economic Assessment) and Appendix 8 (Planning Assessment).

- d. CRC does not consider that this matter can be appropriately addressed through conditions. However, CRC remains open to expert conferencing and/or a hearing to provide evidence and assist the Panel as appropriate.
2. *Housing demand and benefits: The evidence of location-specific demand for housing at Ōhoka; the contribution of existing zoned, consented and Fast-track capacity elsewhere in Waimakariri and Greater Christchurch; and the certainty, timing and nature of the housing and retirement-living benefits claimed.*
- a. CRC's economic expert considers that the evidence provided demonstrates general demand for additional housing in Waimakariri, but does not establish specific demand for the proposed housing at Ōhoka, including the likely price points, housing types, buyer or tenant markets, and rate of uptake. The September updates provide greater detail on the physical form of the development but do not address these outstanding matters. Accordingly, the claimed housing benefits remain illustrative rather than demonstrating that the proposed 856 residential lots, 250 retirement units and commercial component can be delivered and absorbed as assumed.
 - b. CRC's economic expert further considers that the Applicant has not adequately accounted for existing zoned, consented and Fast-track development capacity elsewhere in Waimakariri and Greater Christchurch. In particular, it does not establish the extent to which the Ōhoka development would provide additional housing and retirement capacity rather than displacing development that would otherwise occur elsewhere. The differing counterfactual assumptions between the M.E and Savvy assessments remain unresolved, meaning the extent and significance of the claimed regional and national benefits cannot be reliably determined.
 - c. CRC's economic assessment considers that the claimed housing, retirement-living and commercial benefits remain uncertain in terms of their scale, timing and delivery. The Applicant has not provided a committed programme for dwelling or retirement-unit delivery, evidence of market take-up, or committed commercial tenants, while the M.E assessment continues to rely on assumptions regarding development over a ten-year period. The revised proposal also differs from the scheme assessed by M.E, with 856 rather than 875 residential lots, and the economic assessment has not been updated accordingly. The evidence therefore does not establish that the consent-enabled capacity will translate into completed and occupied development within the timeframe assumed.
 - d. CRC's economic expert considers that while additional housing supply may contribute to improved affordability and greater market competition, the evidence does not quantify the extent of these benefits or demonstrate that the proposed housing will address identified affordability constraints. This is particularly relevant given the significant proportion of larger and premium dwellings proposed. Similarly, the claimed benefits from increased land-market competition have not been quantified. The nature and significance of the claimed affordability and competition benefits therefore remain unsubstantiated.
 - e. CRC does not consider that this matter can be appropriately addressed through conditions. However, CRC remains open to expert conferencing and/or a hearing to provide evidence and assist the Panel as appropriate.

3. *Potable water supply: The feasibility, capacity, resilience and long-term ownership of the proposed staged water-supply solution; effects of the proposed bores on existing groundwater users, springs, wetlands and surface water.*
- a. CRC's groundwater expert considers that the feasibility and effects of the proposed staged water-supply solution require further assessment. The Applicant's updated Water Supply Memo provides more accurate bore locations and updates some of the previous modelling; however, it does not include the cumulative drawdown assessment required under CLWRP Schedule 12 for all existing groundwater takes and the five proposed new bores. Further assessment is therefore required to provide a clear basis for comparing the potential effects on existing groundwater users and connected surface-water environments.
 - b. CRC supports the proposed requirement for step testing and aquifer testing, including the use of observation bores, but considers that the results of this testing could differ from the current modelled predictions. This is particularly relevant to groundwater drawdown and stream depletion, as the modelling relies on aquifer parameters that are subject to uncertainty. The test results should therefore be used to update and confirm the assessment of effects on existing groundwater users, springs, wetlands and surface waters, including confirmation that groundwater drawdown effects will not exceed those provided for under CLWRP Schedule 12. The assessment should also confirm the extent of any resulting stream-depletion effects. In assessing these effects, consideration should be given to the extent to which stream depletion would be distributed throughout the year, which may reduce abstraction pressure during the irrigation season, as well as the separate reduction in groundwater recharge to the Ōhoka South Branch area and associated spring-fed tributaries. This is particularly relevant given that the affected surface-water catchment is already over-allocated.
 - c. CRC considers that the relevant water-supply conditions should require the testing and updated assessment to be provided to CRC before the associated stage proceeds. CRC should be satisfied, based on the results of the step and aquifer testing and any updated modelling, that the resulting groundwater drawdown effects comply with CLWRP Schedule 12 and that the associated stream-depletion effects are acceptable, particularly having regard to the existing allocation status of the affected surface-water catchment. This would provide greater certainty that the proposed water-supply solution will not result in unacceptable effects on existing groundwater users or further adversely affect the already over-allocated surface-water resource as the development is progressively established. The detailed technical advice supporting CRC's position is provided in Appendix 5 (Groundwater) and Appendix 10 (Surface Water).
4. *Dewatering and stream depletion: the conceptual hydrogeological model used; whether cumulative depletion effects on the Ōhoka Stream, its tributaries, springs and wetlands have been adequately assessed, including from any long-term subsoil drainage required.*
- a. CRC's groundwater expert considers that the conceptual hydrogeological model of a shallow water-table aquifer is appropriate; however, there is uncertainty as to whether the stream-bed conductance assumption used in the Applicant's stream-depletion assessment appropriately reflects the site-specific connection between groundwater and surface water. Springs arise on the property and the Ōhoka Stream has been shown to include both

gaining and potentially losing reaches, indicating that groundwater and surface water are closely connected in this area. The Applicant's assessment applies a stream-bed conductance value based on average conditions across the wider Ōhoka catchment, which may not reflect these site-specific conditions. A more conservative assessment assuming a direct connection between groundwater and surface water indicates stream depletion of approximately 85–92% of the 1.9 L/s dewatering rate. CRC's groundwater expert considers that the actual effect is likely to fall between the two assessments, reflecting variation in the degree of connection along the stream. Further consideration of this uncertainty is therefore required when assessing the effects of dewatering on the Ōhoka Stream and its connected tributaries and springs.

- b. CRC also considers that the cumulative effects of long-term subsoil drainage and changes in groundwater recharge require further consideration. Long-term subsoil drainage may intercept groundwater and locally alter groundwater flow paths, including the flow of groundwater to springs and streams. The Applicant's updated assessment of changes in land-surface recharge identifies a potential reduction in groundwater recharge, and potentially spring flow, of approximately 6 L/s associated with hardstand areas. However, this reduction has not been assessed in the context of the flows of affected springs and streams. While the overall discharge from groundwater to the Ōhoka Stream may remain similar, CRC's groundwater expert considers that localised changes to hydrology are likely to occur, including changes to the relationship between groundwater, springs and streams.
 - c. CRC considers that the potential effects of dewatering and long-term subsoil drainage could be further addressed through appropriate monitoring and conditions. The proposed Construction Earthworks Spring and Groundwater Monitoring Plan provides an opportunity to monitor actual effects of dewatering; however, the current plan does not clearly define what would constitute an adverse effect or the response required if adverse effects are identified. CRC considers that the monitoring requirements should establish appropriate baseline monitoring of relevant springs and streams before construction and continue during dewatering and construction, with clear indicators and triggers for responding to potentially significant adverse effects. The identification of appropriate indicators and triggers should be further considered through expert conferencing and/or a hearing to ensure that the monitoring and response framework is fit for purpose. The detailed technical advice supporting CRC's position is provided in Appendix 5 (Groundwater).
5. *Waterways, wetlands and ecology: Whether all affected waterways, springs and natural inland wetlands have been correctly identified and effects quantified accurately; whether avoidance of loss and modification has been adequately considered.*
- a. CRC's land ecology and freshwater ecology experts have reviewed the updated information and consider that further information is required to demonstrate that all affected wetlands and waterways have been appropriately identified and that the effects of their loss and modification have been adequately assessed. The proposal would result in the loss of approximately 3.7 hectares of wetlands and approximately 2,144 metres of stream length. CRC concerns regarding the adequacy of the proposed

mitigation, offsetting and compensation measures, and whether these will achieve no net loss of wetland extent and values and appropriately address the loss of river extent and values, are discussed in paragraphs 43 and 44 above. On the information currently available, CRC is not satisfied that the proposal has demonstrated consistency with NPS-FM Policies 6 and 7. In relation to wetlands, CRC's land ecology expert also considers that the Applicant has not demonstrated that the loss of wetland extent will be replaced on a 1:1 basis, as recommended in the Applicant's own Wetland Assessment.

- b. In relation to waterways, CRC's freshwater ecology expert considers that the proposed package of mitigation, offsetting and compensation could generally be sufficient to address the loss of the approximately 1,584 metres of natural modified watercourses, if the streams proposed to be retained were not also subject to direct effects from the proposal. However, approximately 560 metres of the retained streams would be subject to direct loss, realignment or other effects associated with the development. The current package does not adequately account for these additional effects, and the assessment also requires further consideration of additionality, time lags and potential double counting of mitigation measures, together with appropriate quantification of losses and gains using an established methodology such as Stream Ecological Valuation (SEV). CRC therefore considers that further information is required to demonstrate how the full extent of stream loss and modification will be addressed.
 - c. CRC considers that the final wetland and waterway management package should be appropriately quantified and secured through conditions of consent, including requirements for implementation and ongoing management. For waterways, this may require additional measures such as riparian buffers, wetlands and habitat improvements to address effects on retained streams as well as the loss of stream extent. Conditions should clearly identify the extent and nature of the required measures and provide for their implementation and ongoing management, so that the effectiveness of the final package in addressing the identified ecological effects can be demonstrated.
 - d. CRC considers that the matters identified by its ecological experts could potentially be addressed through further information, further consideration of avoidance and refinement of the proposed management package. However, based on the information currently available, CRC is not satisfied that avoidance of loss and modification has been adequately demonstrated or that the proposed management package addresses the full extent of the ecological effects. The adequacy and effectiveness of the final management package, including the extent to which it is appropriately quantified and secured through conditions, will therefore need to be considered in assessing the overall adverse effects of the proposal. The detailed technical advice supporting CRC's position is provided in Appendix 6 (Wetlands) and Appendix 11 (Waterways).
6. *Stormwater and flooding: Whether the modelling adequately represents groundwater, drainage, climate-change and flood conditions; whether filling, earthworks and urbanisation could increase flooding or drainage effects on adjacent or downstream land.*
- a. CRC's stormwater engineering expert has reviewed the updated Stormwater Management Report and considers that, while the Applicant has provided

further information on stormwater attenuation and conveyance, tailwater effects, groundwater levels and post-development peak flows, uncertainty remains as to whether the modelling adequately represents the range of conditions relevant to the proposed development. In particular, further information is required to confirm that post-development discharge rates and volumes will not exceed pre-development conditions, to justify the C-value of 0.47 and 20% impervious area assumption, and to assess a wider range of Annual Exceedance Probability (AEP) events and storm durations. The groundwater assessment also requires further consideration, including groundwater levels in Catchments 10 and 11 and the relationship between groundwater levels and the proposed Stormwater Management Areas (SMAs). These matters are relevant to confirming that the proposed stormwater infrastructure is appropriately sized and can achieve the required attenuation and treatment outcomes.

- b. CRC also considers that the potential effects of the proposed earthworks and urbanisation on drainage and flooding require further consideration. The assessment of tailwater effects should be expanded to consider potential upstream effects on the SMAs, while the proposed SMA footprints and swale dimensions should be confirmed against the available spatial constraints shown in the civil engineering plans. The proposed 1(v):3(h) mowing slope also differs from the Waimakariri District Council Engineering Code of Practice requirement for a 1(v):4(h) slope and may affect the available footprint or storage capacity of the stormwater infrastructure. Until these matters are resolved, there remains uncertainty as to whether the proposed system can appropriately manage changes in stormwater flows and volumes and avoid adverse effects on adjacent or downstream land and watercourses.
 - c. Given the Fast-track process and the extent to which approval of the proposal may establish the location and configuration of the proposed development and associated stormwater infrastructure, CRC considers that the matters necessary to demonstrate that the stormwater effects can be appropriately managed should be resolved, to the extent practicable, before approval is granted. CRC therefore considers that further information and refinement of the stormwater design is required at this stage, rather than relying solely on detailed design following approval. CRC also considers that appropriate conditions should require sensitivity testing and updating of the final stormwater design, together with independent peer review before construction commences, to confirm that the approved scheme can achieve the required attenuation, treatment and conveyance outcomes and appropriately account for groundwater, drainage, storm and flood conditions.
 - d. CRC anticipates that Waimakariri District Council (WDC) will also provide detailed comment on these matters. CRC is happy to work with WDC and the Applicant through expert conferencing and/or a hearing, as appropriate, to assist in resolving the outstanding technical matters and providing the Panel with greater certainty regarding the adequacy of the proposed stormwater design.
7. *Wastewater and infrastructure: Whether sufficient wastewater capacity is available for each stage; the timing, funding, ownership and operation of necessary on-site and off-site infrastructure.*
- a. CRC considers that the detailed assessment of wastewater capacity, and the timing, funding, ownership and operation of the infrastructure required to service the proposal, is primarily a matter for WDC as the relevant

infrastructure provider. CRC nevertheless provides the following consideration of the economic implications of infrastructure provision for the Panel's consideration.

- b. The potential economic and housing benefits of the proposal should also be considered in the context of the infrastructure costs associated with the development. Recent amendments to the Local Government Act 2002 provide territorial authorities with an additional mechanism to recover growth-related infrastructure costs from eligible Fast-track developments through development contributions. Where such contributions are required, they would represent an additional cost associated with the development and may have implications for the overall cost of delivering the proposed residential sections and, consequently, the extent to which the proposal provides housing at a reasonable cost.
8. *Transport: Whether the transport assessment adequately accounts for the full development, including the retirement village, local centre and projected increases to local school rolls; the effects on the local and State highway networks.*
- a. CRC considers that the detailed assessment of transport capacity and network effects, including the effects on the local and State highway networks arising from the full development, is primarily a matter for WDC and the relevant transport authorities. CRC nevertheless provides comment on the following planning and economic considerations to assist the Panel in assessing the transport implications of the proposal.
 - b. The location of the proposal is inconsistent with the transport and accessibility outcomes sought by the planning framework. CRPS Policy 6.3.4 seeks development patterns that support increased uptake of active and public transport and provide opportunities for modal choice, while NPS-UD Policy 1 identifies good accessibility between housing, employment, community services and open spaces, including through active and public transport, as a characteristic of a well-functioning urban environment. The location and scale of the proposal, including its limited access to public transport, are likely to increase reliance on private vehicle travel and limit opportunities for modal choice.
 - c. The economic assessment considers that the September transport update addresses the design of the subdivision roads and related Council feedback, but does not assess the economic effects of transport pressures associated with the full development. In particular, it does not compare the transport costs and benefits of accommodating growth at Ōhoka, including trips associated with the retirement village, school and commercial centre, against the likely alternative locations where that growth may otherwise occur. Transport impacts such as travel time, vehicle operating costs, safety and emissions can be economically valued, but the assessment does not provide new estimates of these effects.
9. *Proposed conditions: Whether the proposed staging coordinates development with the delivery of transport, including walkways and cycling routes, three waters, education and community infrastructure; whether costs and long-term liabilities are appropriately allocated; and whether the proposed conditions provide sufficient mitigation and are certain, enforceable and supported by stage-linked triggers.*

- a. CRC considers that many of the matters relating to the coordination of staging with transport, including walkways and cycling routes, three waters, education and community infrastructure, and the allocation of associated costs and long-term liabilities, are primarily WDC's area of responsibility. WDC is therefore best placed to provide detailed comment on the adequacy of the proposed conditions in relation to these matters.
 - b. In relation to water supply, CRC considers that the proposed supply bores should be established and tested before the relevant stage proceeds. The results of the required step testing should be provided to CRC, with confirmation that the resulting stream-depletion and groundwater drawdown effects are acceptable. CRC considers that this should form an enforceable stage-linked trigger, such that the relevant development cannot proceed until the water supply and associated effects have been appropriately confirmed.
 - c. More generally, CRC considers that while stage-linked triggers may assist in managing delivery and infrastructure risks, they should also account for cumulative network capacity, existing and consented demand, programmed growth and other reasonably foreseeable development that may rely on the same infrastructure, rather than assessing each Ōhoka stage in isolation. The proposed conditions should therefore provide sufficient certainty regarding the delivery and funding of infrastructure, the allocation of long-term costs and liabilities, and the cumulative capacity of infrastructure relied upon by the development before relevant stages proceed.
10. *Commenters are encouraged to identify the evidence supporting their position and, where they identify an issue, to propose practicable amendments to the conditions or other measures that may address it.*
- a. CRC has sought to identify the evidence supporting its position throughout the responses above and, where matters requiring further consideration have been identified, has proposed practicable amendments to the conditions and/or other measures that could address the matters raised.

SECTION 105 AND 107 OF THE RMA

- 72. Sections 105 and 107 remain relevant RMA considerations when applying Clause 17 of Schedule 5 of the FTAA (although they cannot be used as a reason to decline an application under the FTAA).
- 73. In regard to section 105(1)(c) of the RMA, CRC has considered whether there are any alternative methods of discharge, including discharge into any other environment. CRC considers that there are no other reasonable and practicable alternatives to the proposed discharge method and is therefore satisfied that the requirements of section 105(1)(c) have been addressed.
- 74. In regard to section 107 of the RMA, CRC is unable to confirm at this stage whether the proposed discharges will meet the requirements of section 107, as further information and assessment is required to determine the potential effects of the discharges on the receiving environment. Once this further information is provided, CRC will be able to consider the proposal further and provide more definitive comment in relation to section 107.

PART 2 OF THE RMA

75. The statutory direction for a panel to take into account key provisions of the RMA includes consideration of Part 2 of the RMA.
76. Council consider that mana whenua are best placed to comment on whether the following have occurred:
 - a. Recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taonga.
 - b. Have particular regard to kaitiakitanga.
77. Council considers that WDC are best placed to assess whether the outstanding natural features and landscapes identified in their district plan are protected from inappropriate subdivision, use, and development.
78. Council limits its conclusions in this regard to matters that it has directly assessed and reviewed.
79. The Applicant has included a comprehensive Part 2 assessment within the Application. Based on the information currently available and the outstanding matters identified in this report, Council is not currently able to agree with the Applicant's conclusion that the proposal will meet the sustainable management purpose of the RMA. Further information and consideration of the outstanding matters would be required before Council could reach a view on whether the proposal achieves the purpose of the RMA.

CONSENT CONDITIONS

80. Section 83 of the FTAA requires that conditions be no more onerous than necessary to address the reason for which it is set in accordance with the provision of the Act that confers the discretion.
81. CRC has focussed on the conditions that relate to the approvals that would otherwise be granted by CRC. Council notes that it is willing to continue to work on conditions, including in collaboration with the Applicant and other participants, to the extent that the Panel requests or directs it to do so.

Applicant's Volunteered Conditions

82. Generally, CRC is in agreement with the Applicant's volunteered consent conditions and considers that they provide an appropriate framework for managing many of the effects of the proposal. However, as discussed throughout this report, CRC does not consider that the proposed conditions, in their current form, adequately address all of the potential adverse effects of the proposal. In particular, there are outstanding matters relating to the necessity, adequacy and implementation of conditions that may be significant in scale. Where these matters relate to effects that can appropriately be addressed through conditions, Council's recommended approach is discussed in the relevant adverse effects sections and summarised in Appendix 1. CRC's comments on the proposed conditions are based on the information currently available. As further information becomes available and the conditions are further developed, CRC may identify additional matters requiring consideration.
83. One matter of particular concern is the Applicant's proposed deemed certification provisions for management plans. CRC strongly opposes these provisions. Management plans are intended to provide important environmental safeguards for

the construction activities, and CRC considers that they should be subject to certification before the relevant works commence. Allowing a management plan to be deemed certified where CRC has not responded within the specified timeframe creates a risk that a management plan may be implemented without adequate review and certification, and does not provide sufficient assurance that the intended environmental outcomes will be achieved. CRC considers that this approach is inconsistent with the need for certainty as to the requirements of consent conditions and the environmental protections to be provided through management plans. CRC therefore recommends that the deemed certification provisions be removed from the conditions.

84. Recommended changes to the Applicant's volunteered consent conditions are included in CRC's suite of consent conditions attached as Appendix 2.

Consent Duration

85. Section 123 of the RMA applies to a decision of the panel on the consent. The Applicant seeks the following consent durations:
- a. 35 years for the following activities
 - i. Non-consumptive groundwater take (section 14 Water Permit - ongoing take via sub-soil drains)
 - ii. Community water supply take (section 14 Water Permit)
 - iii. Discharge of groundwater to groundwater (non-consumptive) for sub-soil drainage (section 15 Discharge Permit)
 - iv. Operational stormwater discharge from the stormwater system (section 15 Discharge Permit)
86. The Applicant proposes to manage all other regional activities through lapse provisions and conditions and no set duration.
87. Section 123 of the RMA specifically addresses the duration of resource consents. Under section 123(1)(d), the period for which an "other resource consent" is granted must be specified in the consent, for a period not exceeding 35 years from the date of granting, and where no period is specified, the consent has a statutory duration of five years from the date of commencement of the consent under section 116. This provision applies to resource consents such as water permits and discharge permits that do not fall within the other categories identified in section 123.
88. The Applicant's approach of relying on lapse provisions and conditions, without specifying a duration, does not address the requirements of section 123 for the relevant construction-phase water and discharge permits. A lapse date under section 125 is a separate matter from the duration of a consent. Section 125 addresses the period within which a consent must be given effect to before it lapses; it does not replace the requirement to address the duration of a consent under section 123.
89. Accordingly, where the construction-phase activities require separate water permits or discharge permits, the consent conditions should specify the duration of those consents in accordance with section 123(1)(d). The Applicant may separately propose an appropriate lapse date under section 125.
90. Should the Panel be minded to grant the consents, Council considers that a 15-year duration is appropriate for the remaining consents. This duration provides an appropriate balance between allowing sufficient flexibility for the staged nature and anticipated timeframe of the development and ensuring that the construction-phase

activities are authorised for a defined period, having regard to the potential effects of those activities on the receiving environment.

APPROVAL

91. FTAA section 85 sets out when a panel must or may decline an approval. Council has not identified any reasons in section 85 that the Panel must decline any approval sought.
92. However, if the adverse effects and outstanding matters identified throughout this report cannot be adequately addressed through further information, mitigation, offsetting and/or appropriate consent conditions, the Panel will need to give careful consideration to the significance of those matters in the context of the proposal as a whole, including the cumulative effect of the adverse effects and uncertainties identified relative to the regional and national benefits claimed by the Applicant.

CONCLUSIONS

93. CRC considers that the proposed development could provide benefits through the provision of additional housing and associated development. However, the extent and significance of those benefits have not been sufficiently assessed against an appropriate benchmark to enable CRC to conclude that they are of regional or national significance. The scale and location of the proposed development also raises significant planning issues in relation to the established settlement pattern and the direction of the relevant planning framework.
94. CRC considers that the proposed development has the potential to result in adverse effects that require further consideration, including in relation to water supply and associated stream depletion and groundwater drawdown, the loss of wetlands and waterways, contaminated land and soil reuse, and the effects and adequacy of the proposed stormwater management and discharge arrangements. A number of these effects may be capable of being addressed through further information, refinement of the proposal, additional mitigation and/or conditions of consent. However, a number of matters, including those relating to the scale and location of the development and its consistency with the planned settlement pattern, cannot be fully addressed through conditions. Where this is the case, the Panel will need to consider the relative benefits and adverse impacts of the proposal.
95. CRC considers that the Panel's consideration of the Application should have regard to the relevant policy framework and the evidence provided by the parties. Where benefits and adverse impacts cannot both be accommodated through further mitigation or conditions, CRC has identified relevant policy provisions and planning considerations to assist the Panel in undertaking that weighting exercise.
96. CRC remains willing to work with the Applicant and the Panel to resolve the identified matters where practicable. CRC is available to participate in expert conferencing and/or provide evidence at a hearing, as appropriate, to assist in resolving technical matters and identifying appropriate conditions where these can address the effects identified.

APPENDIX 1: SUMMARY OF POTENTIAL IMPACTS - CRC REVIEW OF DOCUMENT AND RECOMMENDATIONS

Applicant's assessment summary	CRC technical assessment summary	CRC Changes required/conditions sought to address CRC's comment
Contaminated Land – refer to Appendix 3 for full advice provided by Dr Hannah Mirabueno, Canterbury Regional Council Senior Scientist		
- The Applicant proposes that a Remediation Action Plan (RAP) be required as a condition of consent to set out how remediation works will be undertaken. - The Applicant proposes to reuse soil from the site to reduce the amount of imported fill required. They propose that the soil reuse criteria of ANZG GV High or Class 4 'leaching to water' landfill waste criteria be applied, as it considers these criteria to be protective of groundwater and surface water receptors.	CRC's contaminated land expert Dr Mirabueno has reviewed the updated information and considers that the following matters remain outstanding: - The RAP should be provided as part of the FTAA process, rather than just proposed as a condition of consent, given the outstanding investigations of the farm dump areas and potential infilled waterways, and the remedial actions that remain subject to the outcomes of those investigations. - CRC supports the reuse of soil; however, CRC's contaminated land expert considers that further detail should be provided through a Soil Management Plan regarding the criteria for soil reuse, where reused soil will be placed, and the proposed soil-testing regime. Dr Mirabueno also considers that the soil reuse criteria proposed by the Applicant, being ANZG GV High or Class 4 'leaching to water' criteria, are not protective of surface water or groundwater receptors during the operational phase, particularly given the high groundwater levels across the site. Dr Mirabueno considers that the ANZG DGV values and the 'adopted' values in	- The Applicant has proposed Condition 6 in CRC270593, which requires a RAP to be provided prior to the commencement of works. However, CRC considers that, given the outstanding investigations of the farm dump areas and potentially infilled waterways, the RAP should be provided as part of the FTAA process rather than deferred until the commencement of works. - CRC considers that the Applicant should provide a Soil Management Plan as part of the FTAA process, which can be considered and approved through that process. CRC therefore proposes conditions 10 and 11 in CRC270593 requiring works to be undertaken in accordance with the Soil Management Plan and any amendments to the plan to be provided to CRC for certification. CRC also proposes Condition 9 in CRC270593 to specify the acceptable soil reuse criteria.

	Table C-3 Technical Disposal to Land (WasteMINZ, 2023) would be more appropriate soil reuse criteria.	
Economics – refer to Appendix 4 for full advice provided by Dr Richard Meade, Cognitus Economic Insight Principal Economist		
The Applicant has provided an Economic Benefits Assessment prepared by Market Economics and an Economic Costs Assessment prepared by Savvy Analyses, which assess the economic effects and benefits of the Project. The Market Economics assessment estimates that the development could add approximately \$400 million to the regional economy during construction, while the Savvy Analyses assessment considers the predicted costs associated with the development. The two principal costs identified are the potential adverse distributional effects on existing centres and the loss of productive land. However, the report concludes that these costs are likely to be less than minor to minor when considered in the context of the spatial extent of the proposed development. The Applicant considers that the assessments demonstrate that the economic benefits of the Project substantially outweigh the associated costs.	CRC's economic expert Dr Meade has reviewed the updated information and considers that the following significant gaps in the economic assessment remain: - The Applicant has provided economic impact assessments rather than a cost-benefit analysis. Dr Meade considers that the FTAA requires an assessment of whether the Project generates net benefits having regard to its costs, opportunity costs, disbenefits and adverse impacts. In his view, this requires a CBA rather than an EIA, and the assessments provided do not provide a sufficient basis to determine the Project's net economic benefits or their regional or national significance. - The Applicant has not demonstrated sufficient location-, product- or price-specific demand to support the proposed scale and timing of development at Ōhoka. - The Market Economics and Savvy Analyses assessments rely on materially different counterfactuals, leaving the extent of regional and national additionality uncertain. - Construction expenditure, employment and resource use are presented as economic benefits without demonstrating the resulting consumer, producer or non-market benefits.	CRC considers that the significant matters raised by its economic expert are unlikely to be appropriately addressed through consent conditions. Rather, the Applicant could provide an updated economic assessment in the form of a CBA that addresses the matters raised by Dr Meade, including the Project's costs, opportunity costs, adverse impacts and the appropriate counterfactual. This would provide the Panel with a more robust basis for considering the net benefits of the Project and weighing these against its potential adverse impacts and other relevant matters when considering the Application under the FTAA.

	• Demonstrating that Ōhoka can be serviced does not establish that doing so is economically efficient compared with accommodating growth in planned alternative locations. • The significance of the Project's claimed benefits has not been demonstrated against a clear regional or national benchmark.	
Groundwater Resources – refer to Appendix 5 for full advice provided by Philippa Aitchison-Earl, Canterbury Regional Council Senior Scientist		
• The Applicant provided an updated Water Balance Assessment following a meeting with CRC. The assessment addresses changes in land surface recharge and stream depletion resulting from moving the proposed abstraction for Community Supply to deeper aquifers compared to the existing irrigation abstractions. • The Applicant provided a Groundwater and Spring Flow Monitoring Plan following the same meeting with CRC. The plan outlines previous and proposed monitoring of surface flows and groundwater levels, including the proposed monitoring methodology and frequency. • The Applicant provided Appendix 17c which is an updated Water Supply Memo identifying the proposed locations of the water supply bores and the associated drawdown effects. The assessment of drawdown effects in the Water Supply Memo is based on existing WDC water supply bore BW24/0262 and concludes that the	CRC's groundwater expert Philippa Aitchison-Earl has reviewed the updated information provided by the Applicant and considers that the following gaps in the groundwater assessments remain: • The parameters used in the Water Balance assessment remain uncertain and have not been tested for sensitivity. Ms Aitchison-Earl considers that further certainty will be provided through step and/or aquifer testing of the proposed bores, although some uncertainty will remain. Given the continuous nature of the Community Drinking Water Supply, she considers that effects are likely to become steady and persist over the long term and therefore cannot be appropriately managed in the short term by stopping pumping. • Ms Aitchison-Earl considers that the Community Drinking Water Supply, together with other activities associated with the development, including subsoil drainage, construction dewatering and dust suppression takes, is likely to result	• CRC considers that the proposed Community Water Supply will result in stream-depletion effects that are likely to persist if the development proceeds. The Applicant proposes to retain the existing irrigation consents during the development period, but has proposed conditions restricting their use at times when development-related takes are occurring to avoid overlapping effects. The irrigation consents are proposed to be surrendered once the development is established, which would remove the associated irrigation stream-depletion effects thereafter. However, the Community Water Supply would operate continuously throughout the year, meaning that its associated stream-depletion effect would persist year-round, including outside the irrigation season. The receiving surface water body is currently overallocated, which is relevant to the consideration of any additional stream depletion. Given the

drawdown effects on neighbouring bores as a result of the supply bores will be well within the limits of Schedule 12. The Water Supply Memo also considers alternative supply options including Kaiapoi and Rangiora supplies, but concludes that the establishment of its own supply is the preferred option. • The Applicant proposes to retain the existing irrigation consents during the development period, with conditions restricting their use at times when development-related takes are occurring to avoid overlapping effects. The irrigation consents are proposed to be surrendered once the development is established.	in some unavoidable, localised changes to hydrology in certain areas. The precise nature, extent and magnitude of these changes cannot be determined with certainty before the development occurs • Ms Aitchison-Earl considers that the baseline groundwater level monitoring undertaken to date is appropriate; however, the proposed one-year monitoring period following development is insufficient to understand potential changes during extreme conditions. She considers that the monitoring piezometers should therefore remain installed for future monitoring if required by CRC. She also notes that no definition of adverse effects or trigger levels has been provided to identify when reporting or actions to address adverse effects would be required. • Ms Aitchison-Earl agrees that step and aquifer testing of the proposed bores should be required through the consent conditions. However, she considers that the results of this testing are likely to change the assessed drawdown effects, and the assessment should therefore be updated using the resulting parameters rather than relying on the assessment in the updated Water Supply Memo.	continuous nature of the Community Water Supply, ceasing the take would not be a practical means of managing the effect. CRC considers that the extent and environmental significance of this residual effect should be considered by the Panel when weighing the adverse impacts against the claimed regional and national benefits of the proposal. • CRC considers that updates to the Groundwater and Spring Flow Monitoring Plan are required through Condition 7 of CRC270954. The monitoring requirements should provide for the continued availability of monitoring equipment where required and establish appropriate monitoring of groundwater and surface water conditions. Given the uncertainty regarding the precise nature, extent and magnitude of the hydrological changes that may occur, CRC considers that the conditions should also establish clearly defined triggers and indicators to identify when actual effects exceed those anticipated and when further investigation or management is required. • CRC agrees with the Applicant's proposed conditions requiring step and aquifer testing once the new bores have been drilled. However, CRC considers that the results of this testing should be used to inform an updated drawdown assessment of nearby bores, rather than relying on the assessment in the updated Water Supply Memo. CRC proposes that the updated assessment be submitted to CRC for certification before the new
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		bores become operational for the Community Water Supply, to demonstrate compliance with Schedule 12 and confirm that the proposed takes will not adversely affect existing nearby bores. CRC considers that some localised changes to hydrology are likely to remain if the development proceeds. The ability to appropriately manage these effects will depend on clearly defined monitoring requirements and triggers and indicators that identify when actual effects exceed those anticipated and when further investigation or management is required.
Land Ecology – refer to Appendix 6 for full advice provided by Dr Jean Jack, Canterbury Regional Council Team Leader Land Ecology		
The Applicant's proposal involves the loss of approximately 3.7 hectares of wetland associated with the residential development. The Wetland Assessment provided as Appendix 21 recommends that any loss of wetland extent be replaced on a 1:1 basis.	CRC's land ecology expert Dr Jack has reviewed the assessment provided by the Applicant, including the updated Appendix 47, and considers that the proposal does not provide for a 1:1 replacement of the wetlands lost.	CRC considers that the Applicant should provide further detail on how the proposed 1:1 replacement of wetland loss will be achieved. CRC considers that the proposed wetland replacement should appropriately account for the extent and ecological values of the wetlands lost and should be secured through the consent conditions, including requirements for implementation and ongoing management. CRC therefore proposes the addition of Condition 18 of CRC270954.
Land Resources – refer to Appendix 7 for full advice provided by Dr Matt Riddle, Canterbury Regional Council Senior Scientist		
The Applicant has provided a highly productive land and soils assessment which identifies the presence of Land Use Capability Class 2 and Class 3 soils. The Applicant considers that, as the site is zoned Rural Lifestyle Zone,	CRC's land resources expert Dr Riddle has reviewed the updated information and considers that the following gaps in the assessment remain: Dr Riddle does not contest that the soils within the site are not considered highly	CRC notes that the loss of productive land cannot be mitigated if the development proceeds. CRC considers that this is therefore a matter for the Panel to consider when weighing the regional and national benefits of the

these soils are not considered highly productive land under the NPS-HPL. The Applicant also considers that the productive capacity of the soils is constrained by the poorly drained and wet conditions. • The Applicant's Economic Costs Assessment identifies the current dairy farming land use as uneconomic, with stocking rates of approximately 1.53 cows per hectare compared with a Canterbury average of 3.3 cows per hectare. • The Applicant has proposed multiple methods for dewatering. The primary method is to discharge dewatering water to ground, provided the discharge quality is sufficient. Alternatives include discharging to temporarily exposed gravel layers and using the onsite Stormwater Management Area before discharging to ground or surface water, where the discharge quality is sufficient.	productive land under the NPS-HPL. However, Dr Riddle contests that the productive capacity of the soils is significantly constrained, noting that drainage channels are present across the site and irrigation occurs within the site, indicating that water availability may be a limitation during the growing season. • Dr Riddle disagrees with the Applicant's reasoning that the current land use is uneconomic, noting that some of the identified constraints could be addressed through measures such as grazing stock off-site during winter, the use of feeding pads, or herd homes. • Dr Riddle has concerns regarding the proposed alternative dewatering discharge to temporarily exposed gravel layers. While this approach would improve infiltration to ground, removing the soil would also remove a significant proportion of the soil's filtering capacity to remove contaminants before they reach shallow groundwater. Dr Riddle considers this particularly concerning given the sensitive receptors including spring fed streams and downgradient wetlands in the vicinity of the site.	proposal against the impacts of the development. • CRC considers that the Applicant's comments regarding the current land use being uneconomic are not matters that can be addressed through consent conditions. CRC considers that these matters are therefore for the Panel to consider when weighing the regional and national benefits of the proposal against the impacts of the development. • CRC notes that the proposed dewatering methodology was provided in the Site Management Plan (SMP) submitted as part of the Substantive Application. CRC recommends that the proposed method for discharging dewatering water be removed from the SMP.
Planning – refer to Appendix 8 for full advice provided by Isolina O'Brien, Canterbury Regional Council Planner		
• The Applicant has assessed the proposal against the Canterbury Regional Policy Statement (CRPS) and the Greater Christchurch Spatial Plan (GCSP) and the National Policy	CRC's planning expert Isolina O'Brien has reviewed the updated information and considers that the following gaps in the assessment remain:	• CRC does not consider that there is a practicable solution to address the inconsistency with the CRPS and GCSP, including the direction of CRPS

Statement on Urban Development (NPS-UD). The Applicant considers the proposal to be generally consistent with the CRPS, except for policies and objectives that direct future development within Greater Christchurch, which it considers the proposal to be contrary to. The Applicant considers the proposal to be broadly consistent with the GCSP. • The Applicant has provided an Integrated Transport Assessment (ITA) assessing the transport effects of the proposal on the existing network. The Applicant has also assessed accessibility to employment, community services, and natural and open spaces, and considers these to be reasonable given the location of the proposal. • The Applicant's proposal involves the infilling and drainage of approximately 3.7 hectares of natural inland wetlands associated with the proposed residential development. The Applicant has identified 15 wetlands within the development site as meeting the criteria for natural inland wetlands under the National Policy Statement for Freshwater Management (NPS-FM) and considers the proposed works can be undertaken in accordance with the relevant planning framework.	• Ms O'Brien considers that the Applicant has not adequately addressed the significance of the proposed scale and location of development. The proposal would provide approximately 800 additional residential lots on rural lifestyle-zoned land, compared with approximately 250 existing households in Ōhoka, representing a substantial expansion of the existing settlement rather than incremental growth within the township. Ms O'Brien considers that this is inconsistent with the consolidated and integrated urban form sought by CRPS Objectives 6.2.1 and 6.2.2 and Policies 6.3.1, 6.3.5 and 6.3.7, which seek to avoid unplanned urban expansion, direct growth to identified areas, coordinate development with infrastructure, and protect the function and viability of established centres. The GCSP, which fulfils the NPS-UD requirements for a Future Development Strategy, reinforces this approach by directing growth to identified development areas alongside urban intensification and supporting integrated transport and a strengthened network of centres. The Applicant's assessment does not adequately address the implications of locating growth of this scale at Ōhoka outside the planned settlement pattern, including effects on transport and infrastructure networks, travel patterns, access to	Objectives 6.2.1 and 6.2.2 and Policies 6.3.1, 6.3.5 and 6.3.7, given the scale and location of the proposed development. CRC considers that this inconsistency is therefore a matter for the Panel to consider when weighing the regional and national benefits of the proposal against its impacts. • CRC considers that some effects on the existing road network can be addressed through further engagement with NZTA and WDC, where relevant. However, CRC considers that transport effects associated with the dispersed urban form and limited public transport access cannot be resolved through conditions given the location of the site. These effects are inconsistent with the transport and accessibility outcomes sought by CRPS Policy 6.3.4 and NPS-UD Policy 1, which support active and public transport, modal choice and accessibility. These effects are therefore a matter for the Panel to consider when weighing the regional and national benefits of the proposal against its impacts. • CRC considers that the Applicant should provide an assessment of the wetlands against the ecological significance criteria in Appendix 3 of the CRPS. However, regardless of the outcome of this assessment, CRC considers that the proposal would be contrary to CLWRP Policy 2A.3, as the proposal does not contribute to a well-functioning urban environment. CRC considers that this
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	services, and established Key Activity Centres across Greater Christchurch. Ms O'Brien considers that the Applicant has not adequately addressed the transport implications of the scale and location of the proposal. The development is forecast to generate more than 6,000 vehicle movements per day, placing additional demand on the surrounding road network and key connections to the wider network, including the SH1/Tram Road interchange where the Applicant's own assessment identifies an over-capacity right turn in the AM peak. Given the scale of the development and the absence of public transport connections to the site, the proposal is likely to result in a high reliance on private vehicles and limited opportunities for public and active transport. Ms O'Brien considers that these effects extend beyond the immediate site and need to be considered in terms of the efficient functioning of the wider transport network, accessibility and modal choice, and integration with the strategic transport network. These matters are also relevant to the planning framework. CRPS Policy 6.3.4 seeks development patterns that support increased uptake of active and public transport and provide opportunities for modal choice, while NPS-UD Policy 1 identifies good accessibility, including through active	policy provides relevant direction for the Panel when weighing the adverse effects of the proposal against its claimed regional and national benefits.
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	and public transport, as a characteristic of a well-functioning urban environment. The location and scale of the proposal, outside the planned settlement pattern and in an area without public transport connections, are likely to increase reliance on private vehicle travel and limit opportunities for modal choice. Ms O'Brien therefore considers that the proposal is not consistent with, and does not fully give effect to, these policy directions. Ms O'Brien considers that the Applicant has not adequately addressed the effects of the proposal on natural inland wetlands or demonstrated that the proposed infilling and drainage of approximately 3.7 hectares of wetlands is consistent with the relevant planning framework. Fifteen wetlands at the proposed development site have been assessed by the Applicant as meeting the criteria for natural inland wetlands under the NPS-FM to which CRC is in agreement with, but the Applicant has not assessed the wetlands against the ecological significance criteria in Appendix 3 of the CRPS. The NPS-FM requires no further loss of natural inland wetland extent, subject to the limited exceptions in Canterbury Land Water Regional Plan (CLWRP) Policy 2A.3. Ms O'Brien considers that these exceptions are not met, given the scale and location of the proposal, the rural lifestyle zoning,	
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	and that the site is not identified for urban development. The proposed infilling and drainage are therefore contrary to CLWRP Policy 2A.3.	
Stormwater Engineering – refer to Appendix 9 for full advice provided by John Kindness, GHD Limited Senior Water Engineer		
- The Applicant's Stormwater Management Report (Appendix 31) provides a comparison of discharge flows associated with each of the proposed catchments in Table 6. - Table 4 of the Stormwater Management Report estimates stormwater discharges based on a C-value of 0.47 and an impervious area limit of 20%. - The Applicant has provided an assessment of tailwater impacts downstream of the proposed basins and wetlands. - The Applicant has proposed mowing requirements for stormwater infrastructure with a 1(v):3(h) slope. - Table 6 of the Stormwater Management Report considers peak flows for the post-development catchments across a range of Annual Exceedance Probability (AEP) events and storm durations. - Table 7 of the Stormwater Management Report provides an assessment of groundwater levels to inform the design and sizing of the proposed stormwater management infrastructure. - The Stormwater Management Report provides details of the proposed stormwater design for attenuation and conveyance. The Applicant has also provided Civil Engineering Plans in	CRC's stormwater engineering expert John Kindness has reviewed the updated information and considers that the following matters remain outstanding: - It remains unclear whether post-development stormwater discharge rates and volumes will be less than those under pre-development conditions. Any increase in stormwater runoff rates or volumes could result in adverse effects on downstream watercourses. - The Applicant has not provided justification for the C-value of 0.47 or the 20% impervious area limit. Without appropriate justification, there is a risk that the stormwater system may be undersized, with consequential effects on the performance of the proposed stormwater management measures. - The assessment of tailwater impacts is limited to downstream basins and wetlands and does not address potential upstream effects on the Stormwater Management Areas (SMAs). Mr Kindness considers that these effects need to be assessed to confirm that the proposed stormwater management measures will achieve their intended water quality and quantity outcomes and avoid adverse downstream effects.	CRC considers that: - The Stormwater Management Report should be updated to provide a clear comparison of pre-development and post-development stormwater flows and volumes. The updated assessment should explain where the pre-development and post-development catchments do not align, and Table 3 should include drains and buffers to enable a meaningful comparison of the respective areas. - The Applicant should provide justification for the C-value of 0.47 and the 20% impervious area limit used in the assessment. CRC can provide further comment on the appropriateness of these values once the supporting justification has been provided. - The tailwater assessment should be expanded to address potential effects upstream of the SMAs. CRC proposes Condition 35 of CRC270960 requiring these effects to be considered as part of the further design of the stormwater system and prior to construction. - The Applicant should either reach agreement with Waimakariri District Council to retain the proposed 1(v):3(h) slope, redesign the relevant infrastructure to be consistent with the

Appendix 27 and an updated typical road cross-section identifying spatial constraints for stormwater infrastructure.	• The proposed mowing requirements are not consistent with the Waimakariri District Council Engineering Code of Practice Part 5: Stormwater and Land Drainage, 2025 (WDC ECoP), which requires a 1(v):4(h) slope. Compliance with the WDC ECoP would have implications for the available storage capacity or footprint of the proposed stormwater infrastructure. • The assessment does not consider a sufficient range of AEP events and storm durations. In particular, more frequent events and additional storm durations between one and 12 hours should be assessed to confirm whether six hours represents the critical duration. This is relevant to determining whether proposed multi-use areas can perform their intended dual function while also achieving the required attenuation outcomes. • Groundwater levels have not been assessed for Catchments 10 and 11 in Table 7. It is also unclear whether the reported depth to groundwater has been assessed relative to existing or post-development ground levels, and whether the monitoring locations appropriately represent the areas of the proposed SMAs. • The Stormwater Management Report does not provide sufficient detail regarding the areas required to achieve the proposed attenuation volumes or the sizing of swales required to meet conveyance requirements within the identified spatial constraints. As a result,	WDC ECoP, or consider alternative treatment of the slopes, including planting, and address the associated implications for the stormwater design. • The Applicant should provide an additional assessment as an appendix to the Stormwater Management Report addressing more frequent stormwater events and a wider range of storm durations, including hourly interpolation, to confirm the critical event and duration. CRC would then be able to provide further comment on the suitability of the proposed design. • Additional groundwater monitoring should be undertaken at locations that are appropriate for establishing the highest groundwater levels in the areas proposed for the SMAs. The monitoring results should be correlated with the post-development design surface levels and provided to CRC to confirm that the proposed stormwater infrastructure can achieve its intended function. • The Applicant should provide further information confirming the SMA footprints associated with the proposed attenuation volumes and the maximum typical dimensions of swales required to achieve the conveyance requirements. This information should be compared against the civil engineering drawings to confirm that the proposed infrastructure can be accommodated within the identified spatial constraints. • Overall, CRC considers that uncertainty remains regarding whether the proposed stormwater system can achieve the
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	it remains unclear whether the proposed infrastructure can achieve the intended stormwater quality and quantity outcomes.	required stormwater quality and quantity outcomes. CRC therefore proposes Condition 35 of CRC270960 requiring sensitivity checks during the final design process to confirm that treatment requirements can be achieved and contaminant targets will not be exceeded. CRC also proposes Condition 35 of CRC270960 requiring peer review of the detailed stormwater design, including consideration of the matters identified above, before construction commences.
Surface Water Resources – refer to Appendix 10 for full advice provided by Lucy Just, Canterbury Regional Council Scientist		
The Applicant has provided a Groundwater and Spring Flow Monitoring Plan following a meeting with CRC. The plan outlines previous and proposed monitoring of surface flows and groundwater levels, including the proposed monitoring methodology and frequency. The Applicant proposes monitoring at 13 locations three times per year to capture seasonal base flows.	CRC's surface water resources expert Lucy Just has reviewed the updated information and considers that the following gaps in the surface water resource assessments remain: Ms Just considers that the Applicant's pre-development gauging is temporally limited, with flow data provided for only three dates in 2025. As a result, there is insufficient information to establish an appropriate baseline against which changes in spring flows following development can be assessed, or to determine appropriate triggers and indicators for identifying and managing adverse effects.	CRC considers that updates to the Groundwater and Spring Flow Monitoring Plan are required through Condition 12 of CRC270953. CRC proposes that the condition require a temporary water level recorder to be installed immediately if consent is granted, with the recorder used alongside flow gaugings to establish an appropriate baseline for comparison between pre- and post-development conditions. CRC cannot specify appropriate triggers or indicators at this stage because the Applicant has provided insufficient information to establish the potential effects of the proposal. In particular, the Applicant's surface flow data is limited to three monitoring dates in 2025 and does not provide a sufficient temporal dataset to understand the variability in surface water flows or establish an appropriate baseline. Further information and monitoring will therefore be required

		before there is sufficient information to understand the potential effects and identify appropriate triggers or indicators.
Water Quality and Ecology – refer to Appendix 11 for full advice provided by Dr Olivier Ausseil, Traverse Environmental Principal Scientist		
- The Applicant has provided an assessment of effects from construction- and operational-phase stormwater discharges associated with the development. The assessment considers the concentrations of contaminants expected in the discharges, the proposed discharge points, and the potential effects on the different waterways receiving the discharges. - The Applicant proposes the loss of approximately 2,144 metres of stream length to facilitate the development. The Applicant has also proposed a package of measures to offset or compensate for the loss of waterways.	CRC's water quality and ecology expert Dr Ausseil has reviewed the updated information and consider that the following gaps in the surface water quality and ecology assessments remain: - Dr Ausseil considers that the proposed stormwater discharges may result in conspicuous changes in water clarity and colour, sediment deposition and associated ecological effects, with the greatest risk occurring in the small, predominantly spring-fed receiving channels. The discharges are also likely to result in exceedances of the CLWRP zinc limit and ANZG guidelines for 95% species protection at times. The expert considers that the dilution assessment is not environmentally conservative, particularly under summer low-flow conditions, and that further information is required to understand the frequency and significance of these exceedances and potential effects. - Dr Ausseil considers that the proposed mitigation and offsetting package does not adequately address the potential effects of the proposal or the net loss of stream extent. The expert considers that the current assessment does not adequately address additionality, time lags, potential double counting of mitigation measures, or quantify losses and gains using an established	- CRC proposes the addition of monitoring conditions through Condition 41 to 45 of CRC270960 to assess sediment quality following several years of operation of the stormwater discharges. CRC considers that the condition should also include triggers or indicators requiring further action by the Applicant where adverse effects are identified. These triggers and indicators will be worked through further with the Applicant. CRC has also proposed a number of changes to the operational-phase stormwater discharge conditions in consent CRC270960 and considers that corresponding updates may be required to the Streamworks Management Plan, Ecological Management Plan and Stormwater Management Plan. - CRC considers that the Applicant should provide additional offsetting and/or compensation to address the loss of stream extent and the effects on streams that are to be retained but would be subject to direct loss, realignment or other effects associated with the development. These measures could include riparian buffers, wetlands and habitat improvements. CRC considers that the final package should be appropriately quantified to demonstrate that it adequately addresses the ecological effects of the proposed stream

	methodology such as Stream Ecological Valuation (SEV). Of the 2,144 metres of total net stream loss identified, 560 metres relates to retained streams that will themselves be subject to direct loss, realignment and potential effects from urbanisation and stormwater discharges. The expert considers that additional measures, such as riparian buffers, wetlands and habitat improvements, would therefore be required to address the effects on the retained streams.	losses and should be secured through the consent conditions, including requirements for implementation and ongoing management.
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