

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

<b>Project name</b>	Bangor Village - FTAA-2511-1151
---------------------	---------------------------------

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

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
<b>Organisation name (if relevant)</b>	Canterbury Regional Council (Environment Canterbury)		
<b>*First name</b>	Joanne		
<b>*Last name</b>	Mitten		
<b>Postal address</b>	PO Box 345 Christchurch 8140		
<b>*Contact phone number</b>	s 9(2)(a)	<b>Alternative</b>	
<b>*Email</b>	fasttrack@ecan.govt.nz		

2. Please provide your comments on this application
<p>Tēnā koe,</p> <p>Thank you for your letter received on 19 December 2025 regarding the Bangor Village project from Hughes Developments Limited.</p> <p>Please find the response to the specific questions raised in the above letter from Canterbury Regional Council (<b>CRC</b>), followed by CRC's general comments under s17(1)(a).</p> <p><b>1. Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please also confirm this in writing.</b></p> <p>CRC does not hold a record of any competing applications (per the definition in the Fast-track Approval Act 2024 (<b>FTAA</b>)) in the same project area which have been approved.</p>

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

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

### **3. General Comments under section 17(1) of the Fast Track Act**

#### **Regional or National Benefits**

1. CRC have engaged Formative Ltd to undertake a review (hereafter the Formative review) of the Economic Assessment submitted by the applicant in support of their referral application. The Formative review identified that there are gaps in the applicant's assessment, specifically around transfer effects, which makes it difficult to assess whether the proposal would deliver regionally or nationally significant benefits. The Formative review concludes that, based on the author's interpretation of the information provided, in the context of the demand and supply situation in Darfield, the project will most likely deliver positive economic benefits but that those will not be significant in a regional or national context.
2. The Formative Review is attached as Appendix 1.

#### **Canterbury Regional Policy Statement (CRPS)**

3. The Canterbury Regional Policy Statement (CRPS) gives an overview of the significant resource management issues facing the region, including issues of resource management significance to Ngai Tahu. The purpose of the CRPS is to set out objectives, policies and methods to resolve those resource management issues and to achieve the integrated management of the natural and physical resources of Canterbury.
4. The CRPS seeks to ensure development, including the associated use and provision of infrastructure and services, appropriately manages adverse effects on the environment in order to enable people and communities to provide for their social, economic and cultural well-being.
5. Development can either enable or adversely affect the ability of people and communities to provide for their social, economic and cultural well-being, and health and safety. Once development is established it is likely to exist for a number of generations. Changing the form and structure of established urban, rural-residential and rural areas can be difficult and expensive. Therefore, the

UNCLASSIFIED

CRPS seeks to achieve a robust form of development that is responsive in the long term to changing needs of people and communities.

6. Land-use and infrastructure require coordination and integration in order to ensure potentially significant benefits to people and the community are achieved and that the adverse effects on the environment are appropriately avoided, remedied, or mitigated and/or controlled.
7. Overall, the proposal appears to be generally consistent with the CRPS, subject to adverse effects on the environment being appropriately avoided, remedied, or mitigated and/or controlled. Of particular note for the site are potential adverse effects on the roading network, including State Highways 73 and 77, the Malvern Water Race Scheme, and Selwyn District Council's reticulated services.
8. CRC anticipate that the applicant would provide within a substantive application (if referred) a fulsome assessment of adverse effects as well as suitable Management Plans addressing adverse effects. If a substantive application can appropriately address adverse effects, the proposal would likely be consistent with the CRPS.
9. The relevant objectives and policies of the CRPS are attached as Appendix 2 with further commentary on individual objectives and policies.

**Canterbury Land and Water Regional Plan (CLWRP)**

10. The CLWRP sets out objectives and policies that identify the importance of high-quality freshwater for social, cultural and economic wellbeing, and that recognise the connectivity between land-use and the various sources of freshwater. The CLWRP also recognises that land-use and development will occur but can have adverse effects on the quality of freshwater, if not appropriately managed. Consequently, the CLWRP seeks that land-use and development occur in a manner that avoids, remedies or mitigates adverse effects on the biophysical and cultural values, including Ngai Tahu values, of freshwater in Canterbury.
11. CRC anticipate that the applicant would provide within the application a fulsome assessment of adverse effects as well as comprehensive Management Plans addressing adverse effects of both earthworks, disturbance of contaminated land, and stormwater during the construction phase, in accordance with best practice. CRC also anticipate that both stormwater and wastewater from the proposed subdivision would be connected to reticulated Selwyn District Council infrastructure and that a suitable civil engineering details would be included within the application.

UNCLASSIFIED

12. If a substantive application contains the appropriate assessment, including the relevant specialist assessments and Management Plans, the proposal would likely be consistent with the CLWRP.

13. The relevant objectives and policies of the CLWRP are attached as Appendix 3.

#### **Pre-Application Consultation**

14. Hughes Development Limited (the applicant) sought a meeting with CRC to discuss the potential option of using the Fast-track Approval Act (FTAA) for the Darfield Subdivision Project. A meeting was held between the applicant and CRC on 10 October 2025. Meeting minutes are attached as Appendix 4.

15. The applicant provided an overview of the site and the proposed activity, and the following points from the meeting are noted regarding management of effects associated with consents required under the CLWRP:

- a. A separate application for contaminated land would be lodged with SDC via the RMA prior to the Fast track consent.
- b. The proposal is to increase the open area to four hectares and may trigger the air plan requirements for a Dust Management Plan to be prepared.
- c. There is the potential that there is lizard habitat on the site but this would be confirmed by the applicant.
- d. Two bores exist on-site and would be used for dust suppression during construction then decommissioned. (See further commentary on water supply below)
- e. Both cut and fill and erosion and sediment control plans will be included in the substantive application, and the applicant is looking at adopting CRC's standard conditions.

16. The applicant indicated that they would share their draft substantive application with CRC as well as the referral application once lodged, which would outline the details of the substantive application. CRC outlined the Fast-Track process and the need for up front engagement. The applicant expressed desire to engage with CRC throughout the process.

#### **Site Features**

17. There are several site features and mapped overlays that apply to the site and are relevant to the application. The key site features are:

- a. A Community Drinking Water Supply Point (DAR001) is adjacent to the site.

- b. Several HAIL sites are within the site.
- c. Overlays relating to water allocation and water quality apply to the site.
- d. Malvern Water Race is within the site.

18. Further details are provided in Appendix 5.

**Consent Requirements and Assessment Matters**

19. The applicant would require three resource consents from CRC, as listed below:

- a. Section 9 Land Use Consent
  - i. To use land for excavations within 50m of a surface water body – LWRP Rule 5.176, restricted discretionary.
- b. Section 15 Discharge Permit
  - i. To discharge construction-phase stormwater to land – LWRP Rule 5.94B, restricted discretionary.
- c. Section 15 Discharge Permit
  - i. To discharge stormwater from a reticulated stormwater system to land – LWRP Rule 5.93, restricted discretionary.

20. The three consents, if processed under the RMA, would be bundled together for consideration as restricted discretionary activities. Details of each rule, including matters of discretion are provided in Appendix 6. However, in summary, the key areas of discretion would be:

- a. Fresh water quality
- b. Ecology
- c. Stormwater management
- d. Earthworks management
- e. Contaminated land management
- f. Cultural values

21. Council's internal technical experts have undertaken an initial desktop review of the site in relation to the proposal and raised no concerns. Further review of the application will need to be undertaken when more information is provided as part of a substantive application (if referred).

22. Comments from Council's technical experts are provided in Appendix 6.

*Water Supply*

23. The application indicates the use of the on-site bores to supply water for dust suppression. We note that LWRP Rule 5.114 manages permitted takes of groundwater for properties over 20ha. That rule states:

UNCLASSIFIED

**5.114** *The taking and using of less than 5 L/s and more than 10 m<sup>3</sup> but less than 100 m<sup>3</sup> per property per day of groundwater on a property more than 20ha in area is a permitted activity, provided the following conditions are complied with:*

*1. The bore is located more than 20 m from the property boundary or any surface waterbody.*

24. If the applicant were to require more than 100m<sup>3</sup> of water per day, or the use of more than 5L/s at any one time, the proposed take of groundwater for dust suppression could not be permitted by Rule 5.114.
25. Additionally, as the Selwyn-Waimakariri Groundwater Allocation Zone applies to the site and is currently over-allocated, any take and use of groundwater above the permitted activity limits of Rule 5.114 would be prohibited under LWRP Rule 5.130.
26. The applicant has confirmed via emails dated 28 January 2026 and 31 January 2026 that water carts would be used to collect water from the on-site bores and used for dust suppression in a manner that would comply with Rule 5.114. In addition, water could also be obtained from a Selwyn District Council Bulk Water Extraction Point in Darfield.

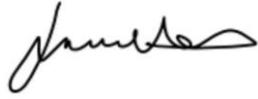
### **Summary**

27. From the information provided to date, no specific site constraints have been identified that would preclude the proposed development from the Regional Council's perspective. The application appears also to be consistent with the regional planning framework, subject to adverse effects being appropriately avoided, remedied, mitigated, or controlled. However, when considering the regional or national significance of the project, the Formative Review concluded that the proposal would most likely deliver economic benefits but that those would not be regionally or nationally significant.
28. CRC trusts that these comments will assist the Minister in determining whether to accept the referral application and proceed with referring the project. Should any further information be required, please do not hesitate to contact us.

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

UNCLASSIFIED

**Signed:**



**Date:** 3 February 2026

**Name:**

Joanne Mitten  
*Principal Consents Planner*

UNCLASSIFIED

## **Appendix 1: Formative Ltd Economic Assessment Review**

### **Memo**

**To: Dwayne Daly, Principal Consents Planner, Environment Canterbury Regional Council**

**From: Derek Foy and Rodney Yeoman, Directors**

**Date: 21 January 2026**

**Re: Economic review of RMA262905 Bangor Village FTAA application**

---

The purpose of this memo is to provide an economic review of the substantive phase of the RMA262905 Bangor Village application under the Fast-track Approvals Act 2024 (FTAA). The application's economics assessment was completed by Savvy Consulting Limited in the report "Bangor Village Economic Assessment Fast Track Application" (October 2025), which was provided as Attachment C to the application (the Savvy report).

### **EXECUTIVE SUMMARY/OVERVIEW**

The applicant's economist acknowledges that the assessment does not provide a full Cost Benefit Analysis (CBA), although does assess the economic costs and benefits of the proposed Bangor Village development. The economic assessment of costs and benefits provided in the Savvy report does not capture social, environmental, or cultural effects. Our understanding is that a full CBA is not necessary under the FTAA given recent decisions on the matter,<sup>1</sup> however a fulsome assessment of costs and benefits is required. There has been some divergence in decisions under the FTAA as to the extent to which net effects are required to be assessed (as opposed to only assessing gross effects, and ignoring transfer effects), and our interpretation is that the extent of the assessment required varies with the project context. For the Bangor Village application we interpret that a full CBA would not be required, and we agree in principle that a sufficient assessment of costs and benefits has been undertaken.

However, our review has established that there are some gaps in the applicant's assessment, focussed around interpreting the degree to which economic effects are net additional to effects that would be generated even in the absence of the proposed development. The absence of robust

---

<sup>1</sup> <https://environment.govt.nz/what-government-is-doing/fast-track-consenting/fast-track-projects/milldale/>;  
<https://environment.govt.nz/what-government-is-doing/fast-track-consenting/fast-track-projects/rangitooopuni/>;  
<https://environment.govt.nz/what-government-is-doing/fast-track-consenting/fast-track-projects/drury/>

UNCLASSIFIED

assessment of those transfer effects makes it difficult to assess the significance of those effects in a FTAA context, specifically whether the proposal will deliver regionally or nationally significant infrastructure. Our interpretation of the information provided, in the context of the demand and supply situation in Darfield, is that the project will most likely deliver positive economic benefits, but that those will not be significant in a regional or national context.

## STRUCTURE

This review focuses only on key issues that could result in significant adverse effects, or which we believe have the potential to materially change the conclusions reached by the applicant's reporting. The following sections set out:

- ❖ Benefits of the project (section 0);
- ❖ Costs of the project (section 0);
- ❖ Disbenefits of the project (section 0);
- ❖ Agreement with the applicant (section 0);
- ❖ Gaps in the analysis and significance (section 0);
- ❖ Areas of contention (section 0);
- ❖ Significance of matters identified (section 0);
- ❖ Solutions and/or conditions sought (section 0).

## BENEFITS OF THE PROJECT

The report identifies the following regional and local economic benefits:

- ❖ An increase in residential land and dwelling supply (700–800 dwellings gross; approximately 540–640 dwellings net).
- ❖ Increased supply would contribute to improved housing choice in the Darfield catchment through a broader mix of lot sizes relative to the status quo enabled within the proposed development area.
- ❖ Potential moderation of housing prices in Darfield through increased supply.

UNCLASSIFIED

- ❖ Economic benefits generated during the planning and construction-phase, including value-added GDP impacts and employment generation.
- ❖ Support for Darfield's role as a Service Township by accommodating population growth associated with employment in the wider catchment.
- ❖ Reduced long-term pressure to expand urban development onto highly productive rural land elsewhere.

We agree with the benefits identified, particularly in relation to housing supply and construction activity, and that the project would materially increase residential capacity and provide a development scale that is significant in the local Darfield and Selwyn context. While we agree with the type of benefits that are identified in the Savvy report, in our opinion there are four main areas that require some response as to the scale and location of benefits that might accrue:

- ❖ The likely timeframe over which the benefits might arise, due to the scale of demand relative to the scale of proposed supply.
- ❖ Where benefits might be experienced.
- ❖ The implications for affordability implied by Savvy's assessment.
- ❖ The quantum of economic benefits as measured in Savvy's assessment, which is also impacted by the three other issues.

We provide an opinion on those four matters in section 0 below.

## **COSTS OF THE PROJECT**

The report identifies few explicit economic costs. Those that are acknowledged include:

- ❖ Infrastructure provision costs, which are largely assumed to be paid for by the developer.<sup>2</sup>
- ❖ Transitional inefficiencies associated with the DEV-DA3 framework.<sup>3</sup>

---

<sup>2</sup> Savvy report, pages 30 and 31

<sup>3</sup> Savvy report, pages 30 and 31

UNCLASSIFIED

- ❖ Loss of highly productive land. It is noted that the land is already zoned for urban use and hence the proposal will not result in the loss of highly productive land, and may actually remove the need for conversion of highly productive land elsewhere.<sup>4</sup>

The Savvy report does not comprehensively address:

- ❖ The full lifecycle costs of infrastructure to Council and the community, including if development contributions do not fully recover long-term infrastructure and maintenance liabilities.
- ❖ Opportunity costs associated with committing a large quantum of growth to a single greenfield location when zoned capacity already exists elsewhere in Darfield or within the Christchurch Urban Environment.
- ❖ Contribution to a well-functioning urban environment. As noted in the Savvy report, Darfield is not part of the Christchurch Urban Environment. However, it is proximate to this area, and some households living in Darfield travel into the Christchurch Urban Environment (Rolleston or Christchurch) for employment due to limited job opportunities within the Darfield catchment. In some cases, new households choosing to live in Bangor Village may otherwise have lived within the Christchurch Urban Environment, where access to employment and services is better, and would better contribute to the functioning of the Christchurch urban environment if they were to establish within that environment, rather than within Darfield.

As a result, economic costs may be understated in the Savvy report, although potentially not to a degree that would change the conclusions reached that benefits would exceed costs by a significant margin. However, we have not reviewed the infrastructure or transport evidence provided by the applicant or seen comments from council experts, so we are unable to establish whether these costs would be large enough to offset the quantified benefits.

Furthermore, we consider that the economic costs that are identified are predominantly local or district costs, with no regional or national costs expected to arise from the project.

---

<sup>4</sup> Savvy report, page 40

## DISBENEFITS OF THE PROJECT

Economic disbenefits are not systematically assessed. Potential disbenefits that are either briefly noted or not addressed include:

- ❖ The risk of over-supply of residential land/potential dwelling capacity in the medium term, given the substantial existing zoned capacity in Darfield.
- ❖ Potential downward pressure on the viability of other planned growth areas.
- ❖ Infrastructure sequencing risks and inefficiencies.
- ❖ Increased car dependency and associated transport costs if employment growth does not co-locate with housing growth.
- ❖ Impact on the Christchurch Urban Environment in terms of contributions to well-functioning urban area.
- ❖ Risk of undermining planned or staged growth strategies.

Notwithstanding the limited coverage of economic disbenefits in the Savvy report, the potential disbenefits will be limited in scale and much smaller than the positive economic benefits identified above. As for the economic costs, the economic disbenefits that are identified are predominantly local or District disbenefits, with no regional or national disbenefits expected to arise from the project.

## AGREEMENT WITH THE APPLICANT

We have not provided further discussion on matters where we agree with conclusions of the applicant, which include:

- ❖ The project would significantly increase housing capacity relative to underlying zoning.
- ❖ Darfield is an appropriate location for accommodating growth in the Selwyn District context, and the Bangor Village site is an appropriate location within Darfield.

- ❖ The proposed development would contribute to a urban area (not urban environment),<sup>5</sup> by encouraging higher density urban development than is currently enabled on the Site, and hence decreasing the future need for urban development to instead occur on rural land around Darfield. Those benefits are countered to some extent by the likelihood that many residents of Bangor Village would travel to the Christchurch Urban Environment (such as Christchurch or Rolleston) for work. In the absence of Bangor Village some of its residents might have chosen to live within the Christchurch Urban Environment and needed to commute less.
- ❖ There is clear evidence of population and household growth in Darfield and its catchment, albeit much slower than observed in the Christchurch Urban Environment.
- ❖ The DEV-DA3 framework is economically inefficient, and may result in development of the Bangor Village site being delayed.
- ❖ Construction activity will generate short-term economic stimulus.

## GAPS IN THE ANALYSIS AND SIGNIFICANCE

While we agree with some of the applicant's conclusions (as listed in section 0), we do wish to make some comments on matters where we reach a different conclusion to the applicant. As stated earlier, those matters are limited to the scale and location of benefits that might accrue, namely:

- ❖ The likely timeframe over which the benefits might arise, due to the scale of demand relative to the scale of proposed supply.
- ❖ The scale of net additional benefits that might arise at the regional and national level, i.e. where benefits might be experienced.
- ❖ The implications within the housing market in terms of the nature of supply and affordability outcomes.
- ❖ The quantum of the construction benefits assessed.

---

<sup>5</sup> Darfield is not part of the Christchurch Urban Environment, and is too small to be an urban environment in its own right using the definition in the NPS-UD.

## Development timeframe

In relation to the first gap, we note that the large number of dwellings proposed may, in the context of the underlying level of demand/projected growth, make it unlikely that Bangor Village would be fully developed as quickly as assumed in the Savvy report. That has implications for the scale of economic impacts assessed in each year, because if a slower rate of construction will yield lower benefits. Also given the time value of money, as accounted for in the Savvy report's application of an 8% discount rate then a longer time frame would result in a reduction in the overall value of the project.<sup>6</sup>

## Where benefits will be experienced

The Savvy report notes that the 700-800 dwellings the proposed development could accommodate equates to all of Darfield's projected housing growth in the medium term (2023-2033), and 50-57% of growth in the long term (2023-2053), when using Selwyn District Council's SRCDM<sup>7</sup> growth projections.<sup>8</sup> Under a higher growth scenario presented by Savvy, the proposed capacity would still equate to 8.1-9.3 years of dwelling growth. That means that under both growth scenarios (SRCDM or Savvy) the proposed development's capacity is sufficiently large so that either:

- ❖ A large majority of Darfield's dwelling growth in the next ten years would need to be directed to the Bangor Village development; or
- ❖ Bangor Village would take much longer to be fully built-out than the 11.5 years assumed in the Savvy report's economic impacts assessment;<sup>9</sup> or
- ❖ More demand will be attracted out of the Christchurch Urban Environment, which would result in slower uptake of residential land and less efficient urban form in Christchurch, with negative implications for a well-functioning Christchurch Urban Environment.

Under the first of those two outcomes there would be little or no residential construction activity elsewhere in Darfield for the next ten years, which would likely result in construction activity that would occur elsewhere in Darfield in the absence of Bangor Village being redirected/transferred to Bangor Village. That transfer means that much of the activity enabled at Bangor Village would not be net additional to the Darfield/Selwyn economy. Under the third alternative the additional growth is

---

<sup>6</sup> Savvy report, page 35

<sup>7</sup> Selwyn Residential Capacity and Demand Model

<sup>8</sup> Savvy report, page 29

<sup>9</sup> As identified on page 34 of the Savvy report

UNCLASSIFIED

attracted from other location in the region, such as Rolleston or Christchurch resulting in a net reduction in growth in the Christchurch Urban Environment.

The potential for that transfer effect is recognised in the Savvy report:

*Furthermore, some of these impacts would be a result of expenditure that is transferred from other locations in the district/region. Specifically, if the proposal was not approved for development, one would typically expect that the demand for activities proposed on the site would be satisfied in another location in the same housing market . This means that at a district/region level much of the economic value associated with the proposal may not be net additional or new, as this value would occur regardless of whether the proposed development occurs or not.<sup>10</sup>*

The Savvy report then goes on to note that notwithstanding this transfer effect, because the proposed development would be more enabling of growth it may result in growth being delivered in a more efficient or affordable way:

*That said, to the extent that the proposal addresses a shortfall in zoned capacity in the locality of demand, that may not necessarily be addressed through other planning processes or market based development (including profit driven development) in a timely manner, then more of the economic impact can be considered net additional. This is because a shortfall of zoned capacity in the locality may result in some growth being directed elsewhere (or being suppressed) or delivered in a less efficient, sustainable or affordable manner . In this light, the proposed development can be seen as enabling projected growth.<sup>11</sup>*

While we agree with the Savvy report's conclusions summarised in those two quotations, we note that those conclusions do not appear to support a position that the Bangor Village development would create significant regional or national benefits, and instead indicate that benefits would be much more localised (as discussed below) and smaller in scale, predominantly due to the fact that the benefits would be a transfer from somewhere else, and not net additional.

We also note that the benefits assessed will accrue primarily at the local/Darfield and Selwyn District level, and be small at a regional and national level. Savvy notes that "Housing supply and the efficient growth of Darfield KAC is a regional issue, albeit one that is addressed at the district level. On that

---

<sup>10</sup> Page 37, page 60

<sup>11</sup> Page 37, page 60

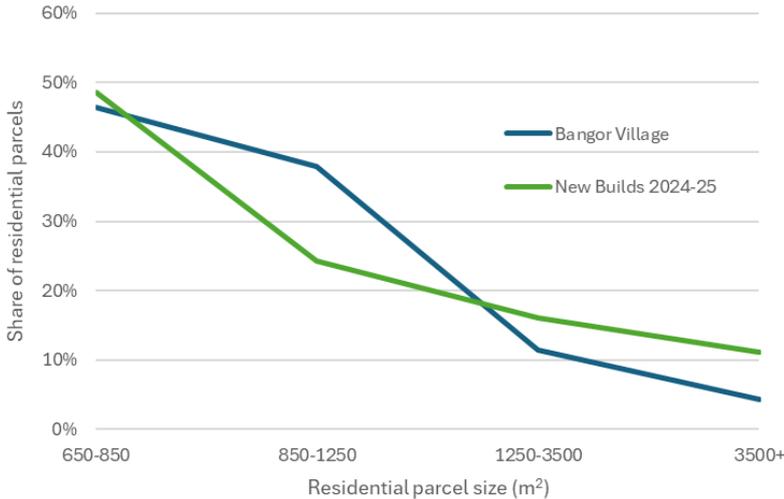
UNCLASSIFIED

basis, the Project is considered to meet the significant regional benefits test.”<sup>12</sup> We disagree, and in our opinion because there is evidence that there is plentiful residential capacity within both Darfield township and the wider Darfield catchment defined by Savvy, the provision of additional capacity on top of the already sufficient capacity will have limited additional benefits, and will do little to enable better enable residential housing growth than the status quo.

## Supply and affordability outcomes

We accept that the Bangor Village development would to a certain degree represent a residential housing product with a point of difference to other Darfield residential developments, being large, master planned, and with a range of densities proposed, However, those factors will generate quite limited economic benefits, which in our opinion would fall short of the significant level required under the FTAA. Figure 0.1 below shows the proposed indicative mix of lots for Bangor Village (blue line) as compared to the new dwellings build in Darfield in 2024 and 2025 sourced from CoreLogic (green line). The data shows that indicative size distribution Savvy has assumed for Bangor Village would be similar to that recently established in Darfield’s new residential lots. Bangor Village would have a slightly smaller share of small lots (i.e. 650-850m<sup>2</sup> 46%) when compared to the existing market (at 49%), however, would indicatively provide more medium sized lots (i.e. 850-1250m<sup>2</sup> 38%) when compared to the existing market (at 24%). The larger lots provided in the Bangor Village development would be a lower share than the existing market. Overall, the Bangor Village development would be denser than the existing market, however not sufficiently so in our opinion to suggest that this development would materially increase the nature of lots available in Darfield.

**Figure 0.1: Size distribution of new residential parcels (Bangor Village proposed and Darfield 2024-2025 actual)**



<sup>12</sup> Savvy report, page 43

UNCLASSIFIED

In terms of affordability Savvy notes that the average dwelling in Darfield sells for \$665,000<sup>13</sup> and the land value averages at \$257,200 per dwelling.<sup>14</sup> We agree that Darfield is relatively affordable, which is a function of both the land values and the nature of the dwellings that are built. Savvy considers that the development will be more affordable because Bangor Village would deliver relatively more affordable residential sections (smaller sections with associated lower land prices).<sup>15</sup> However, Savvy provides no data to substantiate this outcome.

## Construction impacts

The economic impacts assessed relate to the gross dwelling yield (700-800) of the proposal, rather than the net additional yield (540–640 dwellings). Use of the gross, not net dwelling yield means that economic impact assessment will tend to overstate the net additional economic impacts the proposal would enable. However, we accept Savvy's observation that the costs that DEV-DA3 would require of the developer to 'future-proof' infrastructure servicing the land may mean the land may be undeveloped for longer, which could be a reason to apply the gross dwelling yield.

Further in relation to the construction impacts assessed, we note that Savvy has used average construction costs (\$3,000 per m<sup>2</sup>) and dwelling size (215m<sup>2</sup>) to estimate the value of the economic benefits.<sup>16</sup> This means that on average the build cost alone is \$645,000 per dwelling, which is almost the same as the current average sale price in Darfield of \$665,000. Combining any sensible price for the lots with Savvy's average construction costs will result in a final sales price that is higher than the existing average in Darfield, and hence less affordable.

The implication is that either:

- ❖ to be more affordable than the current market the applicant has to sell the lots for less than \$20,000 each to be below the average sale price in Darfield (i.e. Savvy build cost of \$645,000 plus \$10,000 for the land to match the average price); or
- ❖ Bangor Village will be less affordable than the current market. As an example, if the applicant sells each lot for \$200,000 and Savvy build costs of \$645,000 are applied, then each dwelling needs to sell for \$870,000. In this case, Bangor would be 27% less affordable than the current market; or
- ❖ Savvy's assumed average build costs or dwelling sizes are incorrect. As an example, if the applicant sells each lot for \$200,000 and smaller dwelling/build

---

<sup>13</sup> Savvy report, page 51

<sup>14</sup> Savvy report, page 52

<sup>15</sup> Savvy report, page 33

<sup>16</sup> Savvy report, page 35

UNCLASSIFIED

costs of \$500,000 are applied then each dwelling needs to sell for \$700,000. In this case, Bangor would still be 5% less affordable than the current market.

That then means that Bangor Village would likely be less affordable than the current Darfield market, although potentially more affordable than alternatives in either the Christchurch urban environment, or on the Bangor Village site under the existing provisions given the influence of DEV-DA3. However, the lower affordability compared to the existing Darfield market indicates that Savvy may have overestimated the build costs of each dwelling. Because Savvy's build costs represent 79% of the quantified benefits, if Savvy had applied a lower build cost and/or small dwelling size, then this would materially reduce the economic benefits. There is an inconsistency between the proposal to provide more affordable housing and economic benefits quantified.

In summary, if the proposed Bangor Village takes much longer to be fully built-out than the 11.5 years assumed in the Savvy report's economic impacts assessment, the economic impacts of the development would be lower than calculated in the Savvy report. Savvy has acknowledged but not accounted for the transfer effect, and if this known impact was included in the assessment to estimate net additional benefits then the resulting benefits would be lower.

Overall, we consider that the general scale of economic benefits (GDP/value added and employment) that Savvy has calculated is overstated as a result of the assumptions applied. As an indication of the scale of this potential overstatement, we an alternative impact estimates, based on different assumptions. If the build-out period was twice as long (23 years), half of the development was assumed to be a transfer effect, and the build costs more aligned current market (at \$500,000 per dwelling), then the net present value of the economic impacts would be about two thirds less, using the 8% discount rate (i.e. less than \$90m as compared to \$258m in the Savvy report). If this scenario was applied, then in any one year the proposed Bangor Village would represent a net gain of less than 0.02% of regional GDP in Canterbury.

## AREAS OF CONTENTION

Key areas of contention include:

- ❖ The weight placed on construction-phase economic impacts as evidence of long-term economic significance.
- ❖ The conclusion that economic costs and disbenefits are minimal.
- ❖ The implicit assumption that additional housing supply necessarily delivers net economic benefit regardless of market timing or infrastructure context.

We have explained above how our opinion on those matters differs to the conclusions presented in the Savvy report. In summary we reach a different conclusion on the significance of the effects of the proposed development because we expect that most of the positive economic effects will be transferred from somewhere else in Darfield or Selwyn, and therefore would not be net additional to

UNCLASSIFIED

the economic effects that would be created in the absence of the development. While the likelihood of the transfer effect is recognised in the Savvy report, the likelihood does not appear to influence Savvy's conclusion in the same way that it influences our conclusion, and that is the key point of difference which underlies the areas of contention listed above.

It is not clear from the Savvy assessment how the infrastructure required to service the proposed development would be funded, and whether it would place an additional funding burden on ratepayers. The Savvy report indicates that funding burden of infrastructure required to be put in place under DEV-DA3 would be borne by the developer, but if that burden is actually borne by the Council, the observations that Savvy makes regarding funding burden on the developer might instead apply to the Council instead. That potential burden on Council could be material in terms of its ability to adequately finance and service growth, and is a matter that should be taken into account when evaluating the merits of the application.

## **SIGNIFICANCE OF THESE MATTERS**

These gaps and matters of contention are significant because:

- ❖ They directly affect whether the project can reasonably be considered to deliver significant net regional economic benefit.
- ❖ They influence infrastructure funding outcomes and long-term costs borne by Council and the community.
- ❖ They affect the efficiency and sequencing of urban growth in Darfield, the wider Selwyn District and the Christchurch Urban Environment.
- ❖ They are relevant to whether the FTAA test of benefits being out of proportion to adverse effects is met.

If the economic benefits of the proposed development are less than anticipated in the Savvy report, either because construction occurs over a longer period than Savvy assumes, or because a large proportion of the benefits are not net additional, or construction activity is overstated, this directly and materially affects the conclusions drawn about the significance of the regional and national economic impacts of the proposal.

The scale of the proposed development relative to the amount of residential land supply/capacity in Darfield (as identified in the Savvy report) indicates a lack of need for this scale of additional residential land supply, at least within the next 10 years, and supports a conclusion that the economic effects of the proposed development are likely to be less significant than assessed in the Savvy report.

UNCLASSIFIED

# SOLUTIONS AND/OR CONDITIONS SOUGHT

In our opinion the benefits of the proposed development would outweigh the costs and there are no economics reasons why the proposed development should not be enabled. However, there is uncertainty as to whether the economic effects would be significant in the context of the FTAA, depending on how 'significance' is interpreted.

In our opinion no conditions would be necessary from an economics perspective if the proposal were to be approved.

**Derek Foy**  
**Director**

s 9(2)(a) [redacted]  
s 9(2)(a) [redacted]  
www.formative.co.nz

**Rodney Yeoman**  
**Director**

s 9(2)(a) [redacted]  
s 9(2)(a) [redacted]

# APPENDIX: QUALIFICATIONS AND EXPERIENCE

## Derek Foy

Derek holds the qualifications of a BSc in Geography and an LLB from the University of Auckland. He has 25 years consulting and project experience, working for commercial and public sector clients. He specialises in retail analysis, assessment of demand and markets, the form and function of urban economies, the preparation of forecasts, and evaluation of outcomes and effects.

Derek has applied these specialties in studies throughout New Zealand, across most sectors of the economy, notably assessments of industrial, retail, commercial, and services demand, urban form, housing, tourism and local government.

He has worked for many Councils, assisting them with assessing and reviewing consent and plan change applications and providing input into development planning and policy development. He also has private sector clients include large national retail chains, residential land developers, infrastructure providers and industry bodies.

He has undertaken assessments for plan change requests and District Plan reviews throughout New Zealand, including throughout the high growth environments of Auckland and Greater Christchurch, and have similarly broad experience assessing developments under the national policy statements on urban development and highly productive land. Most relevant is his work on various plan changes in Selwyn, which includes Plan Change 80, Plan Change 66, and the Townsend Stewart Environment Court appeal.

Derek is a member of the New Zealand Association of Economists, the Population Association of New Zealand, and the New Zealand Association for Impact Assessment.

## Rodney Yeoman

Rodney holds a Bachelor of Commerce and a Bachelor of Laws from the University of Auckland (2003). He also has a Postgraduate Honours in Economics from the Australian National University (2005). He has 19 years consulting and project experience, working for commercial and public sector clients. He specialise in policy assessment, industry and markets research, the form and function of urban economies, the preparation of forecasts, and evaluation of outcomes and effects.

He has applied these specialties in studies throughout New Zealand, and in Australia, across most sectors of the economy, notably assessments of district plan policies and rules, industrial and manufacturing production, business land demand, and other local government issues.

Over the past decade, Rodney has carried out residential and business research for all councils within the Greater Christchurch Partnership. He designed and managed the development of the SRCDM which is used by Savvy in this application. He brings extensive experience in assessing developments under the National Policy Statements on Urban Development and Highly Productive Land.

UNCLASSIFIED

Rodney is a member of the New Zealand Association of Economists, the Population Association of New Zealand, and the New Zealand Association for Impact Assessment.

UNCLASSIFIED

**Appendix 2. Relevant Provisions of the CRPS**

**BANGOR VILLAGE FAST TRACK APPLICATION (REFERRAL) - CONSISTENCY WITH CANTERBURY REGIONAL POLICY STATEMENT (CRPS)**

**Relevant definitions in the CRPS:**

Definition	Relevance to the proposal
<p><b>Community-scale irrigation, stockwater and rural drainage infrastructure</b></p> <p>Any community scale intake, canal, pipe, drain, pumps and overflow network, including associated structures, necessary to convey and store water for enhancing primary productivity and that serves multiple properties and is centrally administered.</p>	<p>There are two SDC water races within the site which are part of the Malvern Water Race Scheme.</p>
<p><b>Critical Infrastructure</b></p> <p>Infrastructure necessary to provide services which, if interrupted, would have a serious effect on the communities within the Region or a wider population, and which would require immediate reinstatement. This includes any structures that support, protect or form part of critical infrastructure. Critical infrastructure includes:</p> <ol style="list-style-type: none"> <li>1. regionally significant airports</li> <li>2. regionally significant ports</li> <li>3. gas storage and distribution facilities</li> <li>4. electricity substations, networks, and distribution installations, including the</li> </ol>	<p>West Coast Road (SH73) and Bangor Road (SH77) which border the site are State Highways and are part of the strategic road network (as defined in the Regional Land Transport Strategy 2005-2015))</p>

<p>electricity distribution network</p> <p>5. supply and treatment of water for public supply</p> <p>6. stormwater and sewage disposal systems</p> <p>7. telecommunications installations and networks</p> <p>8. strategic road and rail networks (defined in the Regional Land Transport Strategy)</p> <p>9. petroleum storage and supply facilities</p> <p>10. public healthcare institutions including hospitals and medical centres</p> <p>11. fire stations, police stations, ambulance stations, emergency coordination facilities.</p>	
<p><b>Essential Structures</b></p> <p>Structures that support or form part of:</p> <p>1. a maritime, road or rail transport network or service;</p> <p>2. water supply, including irrigation infrastructure;</p> <p>3. a telecommunications or radio-communication network;</p> <p>4. an energy generation, supply or transmission facility or network;</p>	<p>The road transport network is an essential structure.</p> <p>Three waters infrastructure are essential structures.</p>

UNCLASSIFIED

<p>5. a flood-protection work or facility;</p> <p>6. water containment, flow or diversion infrastructure;</p> <p>7. a water level or flow-measurement facility;</p> <p>8. a drainage or sewerage system; or</p> <p>9. the infrastructure forming parts of other network utilities. This includes any structures that support essential infrastructure.</p>	
<p><b>Hazardous activity or industry</b></p> <p>An activity or industry that appears on the Hazardous Activity and Industry List (HAIL)</p>	<p>The proposal includes HAIL sites and activities.</p>
<p><b>High hazard area High hazard areas are:</b></p> <p>1. flood hazard areas subject to inundation events where the water depth (metres) x velocity (metres per second) is greater than or equal to 1 or where depths are greater than 1 metre, in a 0.2% annual exceedence probability flood event;</p> <p>2. land outside of greater Christchurch subject to coastal erosion over the next 100 years; and</p> <p>3. land within greater Christchurch likely to be subject to coastal erosion including the cumulative effects of sea level rise over the next 100 years. This includes (but is not limited to) the land located within Hazard Zones 1 and 2 shown on Maps in Appendix 5 of this Regional Policy Statement that have been determined in accordance with Appendix 6; and</p>	<p>The site is located in the Plains Flood Management Overlay in the Selwyn District Plan which may include High Hazard Areas.</p> <p>A site specific assessment may be required to determine whether the site is subject to inundation events where the water depth (metres) x velocity (metres per second) is greater than or equal to 1, or where depths are greater than 1 metre, in a 0.2% AEP flood event.</p>

UNCLASSIFIED

<p>4. land subject to sea water inundation (excluding tsunami) over the next 100 years. This includes (but is not limited to) the land located within the sea water inundation zone boundary shown on Maps in Appendix 5 of this Regional Policy Statement.</p> <p>When determining high hazard areas, projections on the effects of climate change will be taken into account.</p>	
<p><b>Strategic infrastructure</b></p> <p>means those necessary facilities, services and installations which are of greater than local importance, and can include infrastructure that is nationally significant. The following are examples of strategic infrastructure:</p> <ul style="list-style-type: none"> <li>• Strategic transport networks</li> <li>• Christchurch International Airport</li> <li>• Rangiora Airfield</li> <li>• Port of Lyttelton</li> <li>• Bulk fuel supply infrastructure including terminals, wharf lines and pipelines</li> <li>• Defence facilities including Burnham Military Camp and West Melton Military Area</li> <li>• Strategic telecommunications facilities</li> </ul>	<p>West Coast Road (SH73) and Bangor Road (SH77) which border the site are State Highways and are part of the strategic road network (as defined in the Regional Land Transport Strategy 2005-2015))</p>

UNCLASSIFIED

<ul style="list-style-type: none"> <li>• The electricity transmission network</li> <li>• Other strategic network utilities</li> </ul>	
<p><b>Regionally Significant Infrastructure</b></p> <p>Regionally significant infrastructure is:</p> <p>...</p> <p>8. Sewage collection, treatment and disposal networks</p> <p>...</p> <p>11. Established community-scale irrigation and stockwater infrastructure</p> <p>...</p> <p>14. Infrastructure defined as 'strategic infrastructure' in this regional policy statement.</p>	<p>The State Highways which border the site are strategic infrastructure and therefore are regionally significant.</p> <p>The wastewater network is regionally significant infrastructure. The water races as stockwater infrastructure are regionally significant infrastructure.</p>
<p><b>Rural residential (in the Wider Region)</b></p> <p>Rural Residential development means zoned residential development outside or on the fringes of urban areas which for primarily low density residential activities, ancillary activities and associated infrastructure.</p>	<p>The larger lots (up to 1 hectare) meet the definition of rural residential development.</p>

UNCLASSIFIED

<p><b>Versatile Soils</b></p> <p>Land classified as Land Use Capability I or II in the New Zealand Land Resource Inventory.</p>	<p>The site is not identified as Land Use Capability I or II.</p>
---	---

**Objective and Policy Assessment:**

<b>Objective/ Policy</b>	<b>Assessment</b>
<p><b>Chapter 5 – Land Use and Infrastructure</b></p>	
<p><b>Objective 5.2.1 Location, Design and Function of Development (Entire Region)</b></p> <p>Development is located and designed so that it functions in a way that:</p> <ol style="list-style-type: none"> <li>1. achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region’s growth; and</li> <li>2. enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which: <ol style="list-style-type: none"> <li>a. maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values;</li> <li>b. provides sufficient housing choice to meet the region’s housing needs;</li> <li>c. encourages sustainable economic development by enabling business activities in appropriate locations;</li> <li>d. minimises energy use and/or improves energy efficiency;</li> <li>e. enables rural activities that support the rural environment including primary production;</li> </ol> </li> </ol>	<p>The proposal is generally consistent with this objective for the following reasons:</p> <p>The site is adjacent to, and a logical extension of, the existing Darfield Township. The proposal will also enable more housing to be located near rural activities, while managing reverse sensitivity effects on those rural activities.</p> <p>The proposed use of site, with higher density residential development than is currently zoned for, is consolidated</p>

UNCLASSIFIED

<ul style="list-style-type: none"> <li>f. is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure;</li> <li>g. avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable, remedies or mitigates those effects on those resources and infrastructure;</li> <li>h. facilitates the establishment of papakāinga and marae; and</li> <li>i. avoids conflicts between incompatible activities.</li> </ul>	<p>growth. The proposal will also provide more housing choice, through mixed density development, than is currently zoned for.</p> <p>An independent review of the Applicants economic assessment confirms that the proposal will have economic benefits for the Darfield and Selwyn communities, however it is noted that these benefits will not necessarily be regionally significant.</p> <p>The proposal includes retaining native trees and enhancing the water races with native planting as well as measures to prevent stormwater from entering the water race network.</p> <p>Effects on the strategic transport network will need to be managed. A transport memorandum has been provided by the Applicant and there has been consultation with NZTA in relation to the proposal. The Applicant has noted more detailed modelling is to be undertaken in relation to the proposed Bangor Road intersections.</p>
---	---

UNCLASSIFIED

	<p>The proposal seeks to avoid conflicts between incompatible activities through the provision of larger lots on periphery of site (where rural activities occur) and higher density lots located in the middle of the site. Acoustic buffering/fencing is also proposed to manage railway noise.</p>
<p><b>Objective 5.2.2 Integration of land-use and regionally significant infrastructure (Wider Region)</b></p> <p>In relation to the integration of land use and regionally significant infrastructure:</p> <ol style="list-style-type: none"> <li>1. To recognise the benefits of enabling people and communities to provide for their social, economic and cultural well-being and health and safety and to provide for infrastructure that is regionally significant to the extent that it promotes sustainable management in accordance with the RMA.</li> <li>2. To achieve patterns and sequencing of land-use with regionally significant infrastructure in the wider region so that: <ol style="list-style-type: none"> <li>a. development does not result in adverse effects on the operation, use and development of regionally significant</li> <li>b. adverse effects resulting from the development or operation of regionally significant infrastructure are avoided, remedied or mitigated as fully as practicable.</li> </ol> </li> </ol>	<p>The proposal is consistent with this objective as it:</p> <ul style="list-style-type: none"> <li>• includes protection and enhancement measures for the water races which are regionally significant infrastructure.</li> <li>• seeks to manage transport effects on Bangor Road (SH77) and SH73 (west coast road).</li> <li>• Reticulation is available, and the development has been timed to coincide with the provision of this infrastructure.</li> </ul>

UNCLASSIFIED

<p>c. there is increased sustainability, efficiency and liveability.</p>	<p>As noted above the proposal will have localised economic benefits, however these benefits are unlikely to be regionally significant.</p>
<p><b>Objective 5.2.3 Transport network (Wider Region)</b></p> <p>A safe, efficient and effective transport system to meet local regional, inter-regional and national needs for transport, which:</p> <ol style="list-style-type: none"> <li>1. supports a consolidated and sustainable urban form;</li> <li>2. avoids, remedies or mitigates the adverse effects of transport use and its provision;</li> <li>3. provides an acceptable level of accessibility; and</li> <li>4. is consistent with the regional roading hierarchy identified in the Regional Land Transport Strategy.</li> </ol>	<p>Based on the information available, the proposal is consistent with this objective for the following reasons:</p> <p>The provision of access for the development will be onto Bangor Road which is a state highway. Consistent with direction (from NZTA), no direct access to Bangor Road will be provided from the lots to the west of the second proposed access point on Bangor Road. The two accessways are in line with the existing ODP in the SDP however the increase in density (up to 800 lots) will increase effects on the transport network (compared to the original LLR zoning).</p> <p>Preliminary analysis indicates effects will be minimal and the applicant notes that modelling will be required to confirm if upgrades are required. An Integrated Transport Assessment and detailed modelling for the Bangor Road intersections will be undertaken, and it is understood that</p>

UNCLASSIFIED

	this will be provided as part of the substantive application (if referred).
<p><b>Policy 5.3.1 Regional growth (Wider Region)</b></p> <p>To provide, as the primary focus for meeting the wider region’s growth needs, sustainable development patterns that:</p> <ol style="list-style-type: none"> <li>1. ensure that any <ol style="list-style-type: none"> <li>a. urban growth; and</li> <li>b. limited rural residential development</li> </ol> </li> </ol> <p>occur in a form that concentrates, or is attached to, existing urban areas and promotes a coordinated pattern of development;</p> <ol style="list-style-type: none"> <li>2. encourage within urban areas, housing choice, recreation and community facilities, and business opportunities of a character and form that supports urban consolidation;</li> <li>3. promote energy efficiency in urban forms, transport patterns, site location and subdivision layout;</li> <li>4. maintain and enhance the sense of identity and character of the region’s urban areas; and</li> <li>5. encourage high quality urban design, including the maintenance and enhancement of amenity values.</li> </ol>	<p>The proposal is consistent with this policy. The site is adjacent to the Darfield township which promotes a coordinated pattern of development. The proposed layout of subdivision and associated urban design statement indicates the proposal will encourage high quality urban design, including the maintenance and enhancement of amenity values. The mixed density development provides housing choice, active transport pathways, the provision of reserves, and lots which could be developed into a school and supermarket in the future.</p>

UNCLASSIFIED

<p><b>Policy 5.3.2 Development conditions (Wider Region)</b></p> <p>To enable development including regionally significant infrastructure which:</p> <ol style="list-style-type: none"> <li>1. ensure that adverse effects are avoided, remedied or mitigated, including where these would compromise or foreclose: <ol style="list-style-type: none"> <li>a. existing or consented regionally significant infrastructure;</li> <li>b. options for accommodating the consolidated growth and development of existing urban areas;</li> <li>c. the productivity of the region's soil resources, without regard to the need to make appropriate use of soil which is valued for existing or foreseeable future primary production, or through further fragmentation of rural land;</li> <li>d. the protection of sources of water for community supplies;</li> <li>e. significant natural and physical resources;</li> </ol> </li> <li>2. avoid or mitigate: <ol style="list-style-type: none"> <li>a. natural and other hazards, or land uses that would likely result in increases in the frequency and/or severity of hazards;</li> <li>b. reverse sensitivity effects and conflicts between incompatible activities, including identified mineral extraction areas; and</li> </ol> </li> </ol>	<p>Based on the information available the proposal is consistent with this policy. The site is LUC 3 but is already zoned for residential use so is not Highly Productive Land under the NPS-HPL. The RPS only defines versatile soils as LUC1 and 2. Reticulation is being provided along Bangor Road so the development will be able to integrate with that infrastructure provision.</p> <p>In relation to reverse sensitivity effects on adjoining rural land, this will have already been considered through the current large residential lot zoning. However, the application proposes smaller lots than provided for in that zone. The provision of large lots on the boundary of the subdivision is proposed to manage reverse sensitivity effects.</p> <p>Preliminary analysis indicates effects on the transport network will be minimal and the applicant notes that modelling will be required to confirm if upgrades are required. An Integrated Transport Assessment and detailed modelling for the Bangor Road intersections will be undertaken, and it is understood that this will be provided as part of the substantive application (if referred).</p>
--	--

UNCLASSIFIED

<p>3. integrate with:</p> <ul style="list-style-type: none"> <li>a. the efficient and effective provision, maintenance or upgrade of infrastructure; and</li> <li>b. transport networks, connections and modes so as to provide for the sustainable and efficient movement of people, goods and services, and a logical, permeable and safe transport system.</li> </ul>	
<p><b>Policy 5.3.3 Management of development (Wider Region)</b></p> <p>To ensure that substantial developments are designed and built to be of a high-quality, and are robust and resilient:</p> <ul style="list-style-type: none"> <li>1. through promoting, where appropriate, a diversity of residential, employment and recreational choices, for individuals and communities associated with the substantial development; and</li> <li>2. where amenity values, the quality of the environment, and the character of an area are maintained, or appropriately enhanced.</li> </ul>	<p>The proposal is consistent with this policy. A range of densities from 1 hectare to 650m<sup>2</sup> will be provided for which provides more diverse choice than the existing zoning provides for.</p>
<p><b>Policy 5.3.5 Servicing development for potable water, and sewage and stormwater disposal (Wider Region)</b></p> <p>Within the wider region, ensure development is appropriately and efficiently served for the collection, treatment, disposal or re-use of sewage and stormwater, and the provision of potable water, by:</p>	<p>Based on the information available, the proposal is consistent with this policy. Reticulation is available, and the development has been timed to coincide with the provision of this infrastructure. The calculated flow level for the development is greater than the original allowance for the catchment [from 16.9 l/s to 19.25 l/s], the Applicant notes the downstream pipe network is expected to have</p>

UNCLASSIFIED

<p>1. avoiding development which will not be served in a timely manner to avoid or mitigate adverse effects on the environment and human health; and</p> <p>2. requiring these services to be designed, built, managed or upgraded to maximise their on-going effectiveness.</p>	<p>capacity to accommodate this increase in flow and has stated that this will be confirmed with Selwyn District Council during the detailed design stage.</p>
<p><b>Policy 5.3.6 Sewerage, stormwater and potable water infrastructure (Wider Region)</b></p> <p>Within the wider region:</p> <p>1. Avoid development which constrains the on-going ability of the existing sewerage, stormwater and potable water supply infrastructure to be developed and used.</p> <p>2. Enable sewerage, stormwater and potable water infrastructure to be developed and used, provided that, as a result of its location and design:</p> <ul style="list-style-type: none"> <li>a. the adverse effects on significant natural and physical resources are avoided, or where this is not practicable, mitigated; and</li> <li>b. other adverse effects on the environment are appropriately controlled.</li> </ul> <p>3. Discourage sewerage, stormwater and potable water supply infrastructure which will promote development in locations which do not meet Policy 5.3.1.</p>	<p>See above.</p>
<p><b>Policy 5.3.7 Strategic land transport network and arterial roads (Entire Region)</b></p>	<p>Based on the information available, the proposal is consistent with this policy. The application notes that the provision of access for the development will be onto</p>

UNCLASSIFIED

<p>In relation to strategic land transport network and arterial roads, the avoidance of development which:</p> <ol style="list-style-type: none"> <li>1. adversely affects the safe efficient and effective functioning of this network and these roads, including the ability of this infrastructure to support freight and passenger transport services; and</li> <li>2. in relation to the strategic land transport network and arterial roads, to avoid development which forecloses the opportunity for the development of this network and these roads to meet future strategic transport requirements.</li> </ol>	<p>Bangor Road which is a state highway. Consistent with direction (from NZTA), no direct access to Bangor Road will be provided from the lots to the west of the second proposed access to Bangor Road. The two accessways are in line with the existing ODP in the SDP however the increase in density (up to 800 lots) will increase effects on the transport network (compared to the original LLR zoning).</p> <p>Preliminary analysis indicates effects will be minimal and the applicant notes that detailed modelling will be required to confirm if upgrades are required. An Integrated Transport Assessment and detailed modelling for the Bangor Road intersections will be undertaken, and it is understood that this will be provided as part of the substantive application (if referred).</p>
<p><b>Policy 5.3.8 Land use and transport integration (Wider Region)</b></p> <p>Integrate land use and transport planning in a way:</p> <ol style="list-style-type: none"> <li>1. that promotes: <ol style="list-style-type: none"> <li>a. the use of transport modes which have low adverse effects;</li> </ol> </li> </ol>	<p>See above.</p>

UNCLASSIFIED

<p>b. the safe, efficient and effective use of transport infrastructure, and reduces where appropriate the demand for transport;</p> <p>2. that avoids or mitigates conflicts with incompatible activities; and</p> <p>3. where the adverse effects from the development, operation and expansion of the transport system:</p> <p>a. on significant natural and physical resources and cultural values are avoided, or where this is not practicable, remedied or mitigated; and</p> <p>b. are otherwise appropriately controlled.</p>	
<p><b>5.3.9 Regionally significant infrastructure (Wider Region)</b></p> <p>In relation to regionally significant infrastructure (including transport hubs):</p> <p>1. avoid development which constrains the ability of this infrastructure to be developed and used without time or other operational constraints that may arise from adverse effects relating to reverse sensitivity or safety;</p> <p>2. provide for the continuation of existing infrastructure, including its maintenance and operation, without prejudice to any future decision that may be required for the ongoing operation or expansion of that infrastructure; and</p>	<p>The proposal will be consistent with this policy, provided the effects on the water races and the strategic road network (SH77 and SH73) can be managed.</p>

UNCLASSIFIED

<p>3. provide for the expansion of existing infrastructure and development of new infrastructure, while:</p> <p>a. recognising the logistical, technical or operational constraints of this infrastructure and any need to locate activities where a natural or physical resource base exists;</p> <p>b. avoiding any adverse effects on significant natural and physical resources and cultural values and where this is not practicable, remedying or mitigating them, and appropriately controlling other adverse effects on the environment; and</p> <p>c. when determining any proposal within a sensitive environment (including any environment the subject of section 6 of the RMA), requiring that alternative sites, routes, methods and design of all components and associated structures are considered so that the proposal satisfies sections 5(2)(a) – (c) as fully as is practicable.</p>	
<p><b>5.3.11 Community-scale irrigation, stockwater and rural drainage infrastructure (Wider Region)</b></p> <p>In relation to established and consented community-scale irrigation, stockwater and rural drainage infrastructure:</p>	<p>There are two SDC water races which are part of the Malvern Water Race Scheme within the site. The proposal will be consistent with this policy, provided effects on the water races can be managed.</p>

UNCLASSIFIED

<p>1. Avoid development which constrains the ability of this infrastructure in Canterbury to be operated, maintained and upgraded;</p> <p>2. Enable this infrastructure to be operated, maintained and upgraded in Canterbury to more effectively and efficiently transport consented water provided that as a result of its location and design:</p> <p style="padding-left: 40px;">a. The adverse effects on significant natural and physical resources and cultural values are avoided, or where this is not practicable, mitigated; and</p> <p style="padding-left: 40px;">b. other adverse effects on the environment are appropriately managed.</p>	<p>The proposal is designed to ensure the ongoing operation and maintenance of the existing water races while avoiding any constraints from future development. The water races will be protected throughout the development process and incorporated into the proposed reserve network as a 'placemaking feature', Where required, minor realignments and the use of culverts beneath roads and accessways will maintain water flows and allow the water races to function efficiently within the developed site.</p>
<p><b>Chapter 7 – Freshwater</b></p>	
<p><b>Objective 7.2.1 Sustainable management of fresh water</b></p> <p>The region's fresh water resources are sustainably managed to enable people and communities to provide for their economic and social well-being through abstracting and/or using water for irrigation, hydro-electricity generation and other economic activities, and for recreational and amenity values, and any economic and social activities associated with those values, providing:</p> <p>1. the life-supporting capacity ecosystem processes, and indigenous species and their associated freshwater ecosystems and mauri of the fresh water is safe-guarded;</p>	<p>The proposal will be consistent with this policy, provided effects on the water races can be managed. The proposal seeks to manage potential environmental effects on the water races as a result of the development. As part of the proposal the water races will be enhanced through riparian planting, including the establishment of vegetated buffers to mitigate the effects of land-use.</p> <p>Stormwater will be kept separate from the water races to protect water quality, and construction activities will be</p>

UNCLASSIFIED

<p>2. the natural character values of wetlands, lakes and rivers and their margins are preserved and these areas are protected from inappropriate subdivision, use and development and where appropriate restored or enhanced; and</p> <p>3. any actual or reasonably foreseeable requirements for community and stockwater supplies and customary uses, are provided for.</p>	<p>managed through erosion and sediment control measures.</p>
<p><b>Policy 7.3.7 Water quality and land uses</b></p> <p>To avoid, remedy or mitigate adverse effects of changes in land uses on the quality of fresh water (surface or ground) by:</p> <ol style="list-style-type: none"> <li>1. identifying catchments where water quality may be adversely affected, either singularly or cumulatively, by increases in the application of nutrients to land or other changes in land use; and</li> <li>2. controlling changes in land uses to ensure water quality standards are maintained or where water quality is already below the minimum standard for the water body, it is improved to the minimum standard within an appropriate timeframe.</li> </ol>	<p>See above.</p>
<p><b>Chapter 9 – Ecosystems and Indigenous Biodiversity</b></p>	
<p><b>Objective 9.2.1 Halting the decline of Canterbury’s ecosystems and indigenous biodiversity</b></p> <p>The decline in the quality and quantity of Canterbury’s ecosystems and indigenous biodiversity is halted and their life-supporting capacity and mauri safeguarded.</p>	<p>The proposal is generally consistent with this Objective. Mature native vegetation will be retained within reserves and the stormwater system will be designed to prevent runoff from entering the water races that traverse the site. Prior to works in and around the water races such as dewatering or culvert installation, any identified fish species will be relocated, and all new culverts will comply</p>

UNCLASSIFIED

	with NES-F standards to maintain fish passage and ecological connectivity.
<p><b>Objective 9.2.2 Restoration or enhancement of ecosystems and indigenous biodiversity</b></p> <p>Restoration or enhancement of ecosystem functioning and indigenous biodiversity, in appropriate locations, particularly where it can contribute to Canterbury’s distinctive natural character and identity and to the social, cultural, environmental and economic well-being of its people and communities.</p>	Indigenous planting and enhancement of the water races is proposed through riparian planting of native species, and the establishment of reserves to act as buffers.
<p><b>Policy 9.3.4 Promote ecological enhancement and restoration</b></p> <p>To promote the enhancement and restoration of Canterbury’s ecosystems and indigenous biodiversity, in appropriate locations, where this will improve the functioning and long term sustainability of these ecosystems.</p>	See above.
<b>Chapter 11 – Natural Hazards</b>	
<p><b>Objective 11.2.1 Avoid new subdivision, use and development of land that increases risks associated with natural hazards</b></p> <p>New subdivision, use and development of land which increases the risk of natural hazards to people, property and infrastructure is avoided or, where avoidance is not possible, mitigation measures minimise such risks.</p>	The proposal is generally consistent with this objective. To mitigate flood risk, the Applicant will design the stormwater infrastructure to accommodate flows up to the 1 in 500-year (0.2% AEP) event, utilizing roadside swales for storage and secondary flow channels along roads and reserve links to direct excess water away from building platforms. All residential dwellings will be required to

UNCLASSIFIED

	<p>achieve finished floor levels at least 300mm above the 1 in 200-year (0.5% AEP) flood level.</p>
<p><b>Policy 11.3.1 Avoidance of inappropriate development in high hazard areas</b></p> <p>To avoid new subdivision, use and development (except as provided for in Policy 11.3.4) of land in high hazard areas, unless the subdivision, use or development:</p> <ol style="list-style-type: none"> <li>1. is not likely to result in loss of life or serious injuries in the event of a natural hazard occurrence; and</li> <li>2. is not likely to suffer significant damage or loss in the event of a natural hazard occurrence; and</li> <li>3. is not likely to require new or upgraded hazard mitigation works to mitigate or avoid the natural hazard; and</li> <li>4. is not likely to exacerbate the effects of the natural hazard; or</li> <li>5. Outside of greater Christchurch, is proposed to be located in an area zoned or identified in a district plan for urban residential, industrial or commercial use, at the date of notification of the CRPS, in which case the effects of the natural hazard must be mitigated</li> </ol>	<p>Based on the information available, the proposal is consistent with this policy. The site is located in the Plains Flood Management Overlay in the Selwyn District Plan which may include High Hazard Areas. The Applicant has indicated that the site is not in any high hazard areas.</p> <p>A site specific assessment may be required to determine whether the site is subject to inundation events where the water depth (metres) x velocity (metres per second) is greater than or equal to 1, or where depths are greater than 1 metre, in a 0.2% AEP flood event.</p> <p>A hazard assessment should be provided to confirm the site does not contain any high hazard areas.</p>
<p><b>Policy 11.3.2 Avoid development in areas subject to inundation</b></p>	<p>A site specific assessment may be required to determine whether the site is subject to inundation events, and if so</p>

UNCLASSIFIED

<p>In areas not subject to Policy 11.3.1 that are subject to inundation by a 0.5% AEP flood event; any new subdivision, use and development (excluding critical infrastructure) shall be avoided unless there is no increased risk to life, and the subdivision, use or development:</p> <ol style="list-style-type: none"> <li>1. is of a type that is not likely to suffer material damage in an inundation event; or</li> <li>2. is ancillary or incidental to the main development; or</li> <li>3. meets all of the following criteria: <ol style="list-style-type: none"> <li>a. new buildings have an appropriate floor level above the 0.5% AEP design flood level; and</li> <li>b. hazardous substances will not be inundated during a 0.5% AEP flood event; provided that a higher standard of management of inundation hazard events maybe adopted where local catchment conditions warrant (as determined by a cost/benefit assessment).</li> </ol> </li> </ol> <p>When determining areas subject to inundation, climate change projections including sea level rise are to be taken into account.</p>	<p>the extent to which the proposal is consistent with this policy.</p> <p>The Applicant has proposed hazard mitigations, including in relation to infrastructure provision.</p> <p>It is noted that as part of the proposal all residential dwellings will be required to achieve finished floor levels at least 300mm above the 1 in 200-year (0.5% AEP) flood level.</p>
<p><b>Chapter 14 – Air Quality</b></p>	
<p><b>Objective 14.2.1 Maintain or improve ambient air quality</b></p> <p>Maintain or improve ambient air quality so that it is not a danger to people’s health and safety, and reduce the nuisance effects of low ambient air quality.</p>	<p>The proposal is consistent with this objective. During the construction phase, a certified dust management plan will be implemented that includes active mitigation measures</p>

UNCLASSIFIED

	such as on-site water carts and dust suppressant polymers.
<p><b>Objective 14.2.2 Localised adverse effects of discharges on air quality</b></p> <p>Enable the discharges of contaminants into air provided there are no significant localised adverse effects on social, cultural and amenity values, flora and fauna, and other natural and physical resources.</p>	See above.
<b>Chapter 17 – Contaminated Land</b>	
<p><b>Objective 17.2.1 Protection from adverse effects of contaminated land</b></p> <p>Protection of people and the environment from both on-site and off-site adverse effects of contaminated land</p>	The proposal will be consistent with this objective, provided the contaminated land can be managed appropriately. The applicant has undertaken a PSI and DSI for 160 Bangor Road. There are several HAIL sites and activities on the development site that are identified on the LLUR.
<p><b>Policy 17.3.2 Development of, or discharge from contaminated land</b></p> <p>In relation to actually or potentially contaminated land, where new subdivision, use or development is proposed on that land, or where there is a discharge of the contaminant from that land:</p> <ol style="list-style-type: none"> <li>1. a site investigation is to be undertaken to determine the nature and extent of any contamination; and</li> <li>2. if it is found that the land is contaminated, except as provided for in Policy 17.3.3, the actual or potential adverse effects of that contamination, or discharges from the</li> </ol>	The proposal will be consistent with this policy, provided the contaminated land can be managed appropriately. As part of the proposal affected soils will be retained and used on Site, where that is not possible (owing to the concentrations and the risks to human health), those soils will be remediated and/or removed to a specialist landfill. The Applicant has commissioned further investigations of the Site to confirm the extent of soils requiring remediation

UNCLASSIFIED

contaminated land shall be avoided, remedied or mitigated in a manner that does not lead to further significant adverse effects.

and/or removal and to inform the development of a remedial action plan in relation to those soils.

UNCLASSIFIED

### **Appendix 3. Relevant Provisions of the LWRP**

<b>Objectives</b>
3.1 Land and water are managed as integrated natural resources to recognise and enable Ngāi Tahu culture, traditions, customary uses and relationships with land and water
3.2 Water management applies the ethic of ki uta ki tai – from the mountains to the sea – and land and water are managed as integrated natural resources recognising the connectivity between surface water and groundwater, and between fresh water, land and the coast.
3.5 Land uses continue to develop and change in response to socio-economic and community demand.
3.6 Water is recognised as essential to all life and is respected for its intrinsic values.
3.7 Fresh water is managed prudently as a shared resource with many in-stream and out-of- stream values
3.8 The quality and quantity of water in freshwater bodies and their catchments is managed to safeguard the life-supporting capacity of ecosystems and ecosystem processes, including ensuring sufficient flow and quality of water to support the habitat and feeding, breeding, migratory and other behavioural requirements of indigenous species, nesting birds and, where appropriate, trout and salmon
3.8 A High-quality fresh water is available to meet actual and reasonably foreseeable needs for community drinking water supplies
3.11 Water is recognised as an enabler of the economic and social wellbeing of the region.
3.23 Soils are healthy and productive, and human-induced erosion and contamination are minimised
3.24 All activities operate at good environmental practice or better to optimise efficient resource use and protect the region's freshwater resources from quality and quantity degradation
<b>Policies</b>
4.15 In urban areas, the adverse effects on water quality, aquatic ecosystems, existing uses and values of water and public health from the cumulative effects of sewage, wastewater, industrial or trade waste or stormwater discharges are avoided by:  (a) all sewage, industrial or trade waste being discharged into a reticulated system, where available;  (ab) all stormwater being discharged to land or into reticulated system, where a reticulated system is available;  (b) all stormwater being discharged in accordance with a stormwater management plan, where one has been consented;

(c) the implementation of contingency measures to minimise the risk of a discharge from a wastewater reticulation system to surface water in the event of a system failure or overloading of the system beyond its design capacity; and

(d) any reticulated stormwater or wastewater system installed after 11 August 2012 is designed and managed to avoid sewage discharge into surface water.

4.16 Any reticulated stormwater system for any urban area is managed in accordance with a stormwater management plan that addresses the following matters:

(a) the management of all discharges of stormwater into the stormwater system; and

(b) for any reticulated stormwater system established after 11 August 2012, including any extension to any existing reticulated stormwater system, the discharge of stormwater being subject to a land-based or designed treatment system, or wetland treatment prior to any discharge to a lake or river; and

(c) how any discharge of stormwater, treated or untreated, into water or onto land where it may enter water meets or will meet, the water quality outcomes and standards and limits for that waterbody set out in Table 1, Schedules 5 and 8 and Sections 6 to 15,(whichever applies); and

(d) The management of the discharge of stormwater from sites involving the use, storage or disposal of hazardous substances, and

(e) Where the discharge is from an existing local authority network, demonstration of a commitment to progressively improve the quality of the discharge to meet condition (c) as soon as practicable but no later than 2025.

4.16 A Operators of reticulated stormwater systems implement methods to manage the quantity and quality of all stormwater directed to and conveyed by the reticulated stormwater system, and from 1 January 2025 network operators account for and are responsible for the quality and quantity of all stormwater discharged from that reticulated stormwater system.

4.17 Stormwater run-off volumes and peak flows are managed so that they do not cause or exacerbate the risk of inundation, erosion or damage to property or infrastructure downstream or risks to human safety.

4.18 The loss or discharge of sediment or sediment-laden water and other contaminants to surface water from earthworks, including roading, works in the bed of a river or lake, land development or construction, is avoided, and if this is not achievable, the best practicable option is used to minimise the loss or discharge to water.

4.19 The discharge of contaminants to groundwater from earthworks, excavation, waste collection or disposal sites and contaminated land is avoided or minimised by ensuring that:

(a) activities are sited, designed and managed to avoid the contamination of groundwater;

UNCLASSIFIED

(b) existing or closed landfills and contaminated land are managed and monitored where appropriate to minimise any contamination of groundwater; and

(c) there is sufficient thickness of undisturbed sediment in the confining layer over the Coastal Confined Aquifer System to prevent the entry of contaminants into the aquifer or an upward hydraulic gradient is present which would prevent aquifer contamination.

4.22 Sedimentation of water bodies as a result of land clearance, earthworks and cultivation is avoided or minimised by the adoption of control methods and technologies, such as maintaining continuous vegetation cover adjacent to water bodies, or capturing surface run-off to remove sediment and other contaminants or by methods such as direct drilling crops and cultivation that follows the contours of a paddock.

4.23 Any water source used for drinking-water supply is protected from any discharge of contaminants that may have any actual or potential adverse effect on the quality of the drinking-water supply including its taste, clarity and smell and community drinking water supplies are protected so that they align with the CWMS drinking-water targets and meet the drinking-water standards for New Zealand.

4.26 Any discharges of hazardous substances from contaminated land, including existing and closed landfills, are managed to ensure that adverse effects beyond the site boundary on people's health or safety, on human or stock water supplies, or on surface water are avoided.

4.76 Localised land subsidence or other significant effects on the flows or levels of surface water or groundwater from the dewatering of construction sites or other sites, is avoided by limiting the rate or duration of pumping or other appropriate mitigation measures.

4.76 A Adverse effects on surface water quality are minimised through limiting the concentration of sediment and other contaminants present in the dewatering water prior to its discharge to surface water.

## **Section 11 Selwyn - Te Waihora**

The following sub-regional documents are also applicable to the Selwyn - Te Waihora sub-region;

- Waimakariri River Regional Plan 2004
- National Water Conservation (Te Waihora/Lake Ellesmere) Order 1990
- National Water Conservation (Rakaia River) Order 1988.
- Mahaanui Iwi Management Plan 2013
- Te Waihora Joint Management Plan (Mahere Tukutahi o Te Waihora) 2005
- Te Rūnanga o Ngāi Tahu Freshwater Policy Statement 1999.

11.4.1 Manage water abstraction and discharges of contaminants within the entire Selwyn Te Waihora sub-region to avoid, remedy or mitigate adverse cumulative effects on the water quality of

UNCLASSIFIED

Te Waihora/Lake Ellesmere, rivers and shallow groundwater; and the flow of water in springs and tributaries flowing into Te Waihora/Lake Ellesmere and achieve, in combination with non-regulatory actions, the freshwater objectives and outcomes for the sub-region.

11.4.2 In recognition of the importance of the entire catchment to Ngāi Tahu, actively manage the Selwyn Te Waihora sub-region to enable Ngāi Tahu to exercise kaitiakitanga in the management of fresh water.

11.5.30 Within the Selwyn Te Waihora sub-region Regional Rule 5.93 includes the following additional matter of discretion:

1. Any adverse effects on mahinga kai, wāhi tapu or wāhi taonga within the Cultural Landscape/Values Management Area

11.5.31 The discharge of stormwater into a river, lake, wetland or artificial watercourse or onto or into land in circumstances where a contaminant may enter a river, lake, wetland or artificial watercourse in the Halswell River/Huritini catchment that is not authorised by a consented stormwater management plan and the discharge did not occur before 5 December 2013, is a discretionary activity.

## **Appendix 4. Pre-Application Meeting Minutes**

### **Pre-application Advice | 2025**

#### **Pre-Application Advice for Hughes Development Limited – RMA261642**

***Disclaimer:** This technical advice note does not constitute legal advice and should not be relied upon as such. Please note this preliminary advice has been given prior to any official guidance from the Ministry for the Environment relating to Canterbury Regional Council's role under the Fast-track Approvals Act 2024.*

Meeting Date: 10 October 2025

#### **Executive Summary**

Hughes Development Limited (HDL) (the applicant) have sought a meeting with Canterbury Regional Council (CRC) to discuss the potential option of using the Fast-track Approval Act (FTAA) for the Darfield Subdivision Project. The project is not listed in Schedule 2 of the FTAA.

CRC Staff – Anna Stewart, Reuben Herz-Edinger, Nardia Feehan, and David Sluter (Consent Planning)

APPLICANT – Jake Hughes (Applicant) and Alice Burnett (Consultant)

#### **Introduction**

##### *Fast-track Act Consenting:*

Under the FTAA, the applicant is required under section 11(1)(a) to consult with relevant local authorities. HDL will need to provide evidence of this consultation as part of their application.

This pre-application meeting forms part of this consultation and discusses the process going forward for any potential applications by HDL under the FTAA.

##### *Darfield Subdivision Project:*

The applicant requested a pre-app meeting to discuss the proposed Fast-track application. Specifically, the applicant sought advice relating to a 700-800 lot subdivision across multiple stages, with low density around the perimeter of the site and higher density towards the centre while also enabling the ability for a school site and potential supermarket (consented separately), at 160 Bangor Road, Darfield.

#### **Minutes – Notes – Advice**

##### **NOTES FROM MEETING:**

- HDL own the 130-hectare lot, which is currently a working farm and zoned large lot residential.

UNCLASSIFIED

- HDL have previous done two successful development projects through the COVID Fast-track.
- The proposal includes ~ one hectare lots on the outside down to ~ 650 m2 in the middle, with the open spaces maintained.
- The two existing water races will also be retained. The applicant has engaged an ecologist and is working with Selwyn District Council (SDC) as the owner of the races, as these will need to be diverted in stages, planted and culvert vehicles crossings installed that will meet the NPS-FW requirements.
- Stormwater will be discharged to ground and not directly into the water races. Stormwater from the road will be captured in swales to retain the rural character and discharge to soak pits.
- Both water supply and waste will be reticulated, as SDC are currently in the process of reticulating Darfield, with the connection coming from Bangor Road.
- Engagement is also underway with MKL, NZTA and SDC. There is the potential for SDC owned property down the track with schools and commercial options but this not part of the fast-track application and ownership can be transferred later (see Farringdon Oval Development as example).
- SDC have rezoned this land as residential through the plan.
- A separate application for contaminated land will be lodged via the RMA prior to the Fast-track consent, in approximately two months' time. A PSI has been done showing usual background contamination seen on farms and all contaminated soil is proposed to be removed from the site.
- The proposal is to increase the open area to four hectares and may trigger the air plan requirements so a dust management plan will be prepared.
- There is the potential that this is lizard habitat on the site but this will be confirmed.
- Two bores exist on-site and will be used for dust suppression during construction then decommissioned.
- Both cut and fill and erosion and sediment control plans will be included in the substantive application and the applicant is looking at adopting the standard conditions.
- The applicant is looking to share the draft substantive application with CRC as well as the referral application once lodged, which will outline the details of the substantive application.
- CRC outlined the Fast-track process and the need for up front engagement and the applicant expressed desire to engage with CRC throughout the process.

Next Steps:

ACTION – CRC to provide minutes from the meeting

ACTION – Applicant to lodge referral application and inform CRC

UNCLASSIFIED

**Additional Information**

Charging: CRC will charge all ongoing pre-app involvement under RMA261642.

Communication (going forward): Alice (For applicant) and David (for CRC) will be the key contacts

Process: Applicant will continue down the Fast-track pathway

Timelines for pre/ referral and substantive notification: Applicant intends to lodge referral application immediately and if referred lodge the substantive application soon after.

Pre-application Advice | 2025

Signed by

---

Nardia Feehan

Principal Consent Planner

---

David Sluter

Senior Consents Planner - Project Management Officer

UNCLASSIFIED

## **Appendix 5. Site Features**

The site is partially within a Community Drinking Water Protection Zone (Figure 1) that relates to a Community Drinking Water Supply Point having the Ministry of Health Supply Number of DAR001. Selwyn District Council own the land parcel (Section 1 Survey Office Plan 438579) containing the Community Drinking Water Supply Point. It is located on the northern boundary of the application site. CRC has granted Selwyn District Council a Water Permit (CRC254098) to take groundwater from an unconfined aquifer from two bores (BX22/0006 and L35/0980) within the SDC site to provide drinking water to 501 – 5000 dwellings within Darfield.



Figure 1. Community Drinking Water Protection Zones at the water supply point (DAR001).

The site contains the following HAIL sites:

- 90693 – Yet to be reviewed
- 90698 - G5 - Waste disposal to land (offal / waste disposal pits)
- 90696 - A17 - Storage tanks or drums for fuel, chemicals or liquid waste (above ground diesel storage tank)
- 90697 - Storage tanks or drums for fuel, chemicals or liquid waste (below ground petrol storage tank)
- 386616 - G5 - Waste disposal to land (burn area)
- 386618 - I - Any other land (lead contamination)

The site is within the following zones or mapped areas:

- The Selwyn – Waihora Canterbury Water Management Strategy Zone;
- The Selwyn – Waimakariri Combined Surface Water and Groundwater Allocation Zone. The site is over an unconfined or semiconfined aquifer.
- The Selwyn – Waihora Surface Water Allocation Zone;
- The Kowai / Waimakariri Water Race Catchment
- The Selwyn – Waihora Nutrient Allocation Zone. Water quality outcomes have not been met in this zone.
- The site is within an area where the nitrate risk to groundwater has been identified as high;

UNCLASSIFIED

## **Appendix 6. Consent Requirements and Assessment Matters**

The applicant has stated in the referral application that they seek all necessary resource consents required under the LWRP and has identified three CLWRP rules that trigger the need for resource consent. These are detailed below. Based on the details provided and discussion with the applicant to date, the applicant appears to have identified the appropriate rules. However, sufficient details of the proposal have not yet been provided for CRC to be able to confirm the exact consent requirements.

### Rule 5.175:

The use of land to excavate material is a permitted activity, provided the following conditions are met:

1. (N/A)
2. Over an unconfined or semi-confined aquifer:
  - a. the volume of material excavated is less than 100 m<sup>3</sup>; or
  - b. the volume of material excavated is more than 100 m<sup>3</sup> and:
    - (i) there is more than 1m of undisturbed material between the deepest part of the excavation and the highest groundwater level; and
    - (ii) the excavation does not occur within 50 m of any surface waterbody.

The proposed activity cannot meet this rule as it would occur over an unconfined or semi-confined aquifer, the volume of material excavated would be more than 100 m<sup>3</sup>, and excavations would occur within 50 m of a water race. Therefore, resource consent is required under Rule 5.176. The exercise of discretion is restricted to the following matters:

1. The actual and potential adverse environmental effects on the quality of water in aquifers, rivers, lakes, wetlands; and
2. Any need for remediation or long-term treatment of the excavation; and
3. The protection of the confining layer and maintaining levels and groundwater pressures in any confined aquifer, including any alternative methods or locations for the excavation; and
4. The management of any exposed groundwater; and
  - a. Any adverse effects on Ngāi Tahu values or on sites of significance to Ngāi Tahu, including wāhi tapu and wāhi taonga.

### Rule 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 is a restricted discretionary activity, provided the following conditions are met:

- a. For a discharge that existed at 11 August 2012, an application for a discharge permit is lodged prior to 30 June 2018, or at a later date as agreed between the reticulated stormwater system operator and the CRC; and
- b. A stormwater management plan has been prepared to address the management of stormwater in the catchment and is lodged with the application; and
- c. The discharge will not cause a limit in Schedule 8 to be exceeded.

UNCLASSIFIED

The applicant has not provided an assessment against conditions a – c of the rule. However, assuming that these conditions can be met, the exercise of discretion is restricted to the following matters:

1. The quality of, compliance with and monitoring of the stormwater management plan prepared to address the management of stormwater in the catchment and matters set out in guidance documents prepared by the CRC; and
2. The rate and volume of discharge and the changes to the flow regime of a river or artificial watercourse, flood frequency, including flooding of land or dwellings, erosion of river bank and channels; and
3. The concentration of contaminants and resulting actual and potential adverse environmental effects, including cumulative effects on the receiving water quality of surface and groundwater, aquatic ecosystems, Ngāi Tahu cultural values and other existing uses and users of the water, including takes and discharges; and
4. Measures to:
  - a. reduce the volume and concentration of contaminants in the discharge; and
  - b. ensure the volume and rate of discharge do not exceed:
    - (i) the capability of the soil and subsoil layers at the site to reduce contaminant concentrations in the discharge; and
    - (ii) the infiltration capacity of the soil and subsoil layers at the site; and
  - c. avoid the accumulation of toxic or persistent contaminants in the soil or subsoil layers; and
  - d. minimise suspended sediment in stormwater from activities involving earthworks; and
5. The potential benefits of the activity to the applicant, the community and the environment;
6. The need for measures to protect any human or animal drinking-water sources.

Rule 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 is a restricted discretionary activity.

The applicant has not provided an assessment against conditions of Rule 5.94A. However, the conditions of Rule 5.94A include the following conditions (amongst others):

- The discharge is not from, into or onto contaminated or potentially contaminated land; and
- The discharge does not occur within a Community Drinking-water Protection Zone as set out in Schedule 1.

The site contains contaminated or potentially contaminated land and the site is partially within and adjacent to a Community Drinking-water Protection Zone as set out in Schedule 1 of the CLWRP.

The exercise of discretion is restricted to the following matters:

1. The actual and potential effects of the discharge on the quality of surface water, aquatic ecosystems, Ngāi Tahu cultural values; and

UNCLASSIFIED

2. The actual and potential effects of the discharge on the quality and safety of human and animal drinking water; and
3. The actual and potential adverse environmental effects of the quantity of water to be discharged on the banks or bed of a waterbody or on its flood carrying capacity, and on the capacity of the network to convey that discharge; and
4. The potential benefits of the activity to the applicant, the community and the environment.

#### Assessment Matters

The application would need to adequately address these matters in their substantive application. To inform this assessment, the following specialist assessments and Management Plans would be anticipated in support of the application:

- Detailed Site Investigation
- Ecology Report
- Civil Engineering Report
- Geotechnical Report
- Water Quality Report
- Earthworks Management Plan / Erosion and Sediment Control Plan
- Contaminated Site Management Plan and Remedial Action Plan
- Stormwater Management Plan
- Dust Management Plan

The application will also need to assess cultural values. Several Iwi Management Plans are applicable to the area that contains the site. To the extent that they apply to the site and the activity, the Iwi Management Plans should be considered as part of any assessment of Ngāi Tahu values.

The applicant is strongly advised to consult with the relevant Iwi Authorities and include a record of this consultation in the substantive application. Te Taumutu Rūnanga is the local Runanga and the site is within the Te Waihora Co-Governance Area. Mahaanui Kurataiao Ltd are the relevant Papatipu Runanga Environmental Entity who consult with and provide advice on behalf of Te Taumutu Runanga. The following Iwi Management Plans are applicable to the area;

- Iwi Management Plan: Mahaanui Kurataiao
  - Iwi Management Plan: Hazardous Substances New Organisms Policy
  - Iwi Management Plan: Te Whakatau Kaupapa Ngāi Tahu Resource Management Strategy
- Iwi Management Plan: Te Runanga o Ngāi Tahu Freshwater Policy.

#### Technical Expert Comments

CRC's Surface Water Ecology Team reviewed the proposal and made the following comments;

*There are Selwyn DC stock water races that run through the property. These stock water races are well recognised as supporting high aquatic ecological values in some areas, despite being artificial watercourses. A subdivision proposal such as this should be able to adequately manage and minimise disturbance and contaminants entering these water races and manage stormwater appropriately in this area. So, I don't see any intractable issues from a surface water quality/ecology perspective.*

CRC's Land Ecology Team reviewed the proposal and made the following comments;

UNCLASSIFIED

There may be lizard habitat to consider in the treeland area I've circled (Figure 2). Something other subdivisions have been addressing via mitigations/compensation where present.



Figure 2. Treeland Area

CRC's Contaminated Land and Waste Hazards Science Team reviewed the proposal and made the following comments;

*I've had a look through the info we have and there are several HAIL activities present on the site, including a sheep dip, burn piles and an offal pit. Previous investigation has shown elevated contaminant levels (heavy metals) and certain portions of the site require further investigation including the sheep dip and the currently uninvestigated offal pit. This will need addressing prior to development, however this is all manageable and will not provide any major roadblocks to the development of a subdivision.*

CRC's Groundwater Resources Science Team reviewed the proposal and made the following comments;

*Looking at this proposal (mainly Geotech report), it involves deep groundwater levels, reticulated services, and removal of any contaminants below residential values. Therefore, it's of low risk from a groundwater perspective.*

CRC's Natural Hazards Science Team reviewed the proposal and stated that there are no significant issues from a flood hazard (or any other natural hazard) perspective.

UNCLASSIFIED

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

<b>Project name</b>	FTAA-2511-1151 Bangor Village
---------------------	-------------------------------

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

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

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

### Executive Director Endorsement

**Date:** 5 February 2026

Robert Love  
Executive Director – Building, Planning, and Regulatory Services

# Comments on a fast-track consenting application Fast-Track Approvals Act 2024

## Fast-Track Referral Application FTAA-2511-1151 Bangor Village

Thank you for your Invitation to provide written comments on the referral application for the Bangor Village project under section 17 of the Fast Track Approvals Act 2024 (FTAA). Please see below Selwyn District Council's comments on this application.

### 1. Summary

Selwyn District Council has reviewed the referral application for the Bangor Village project proposed under the FTAA, and after assessing the relevant considerations under section 22 subsection (2) of the Act, we determine that the project will not meet the significant regional or national benefits test under section 22 of the Act and therefore should not be accepted for referral.

### 2. Competing Applications

Section 17(3) requires a local authority, when invited to comment on an application seeking referral, to advise of any application currently lodged with the Council that would be a competing application should an application for resource consent proceed through the fast-track approvals process.

The applicant lodged a resource consent application for subdivision consent and related land use consents on 27 June 2024 (RC245541, RC245542, RC245543) relating to the Bangor Village site. That application is for subdivision creating 392 residential sites and a number of related reserves. The application has been on hold since a request for further information was issued in September 2024 and has not progressed beyond that point. It is noted that the existing subdivision application proposes development at a higher density than the current Large lot Residential zoning of the land provides for but with a density that is less than what is proposed in the Bangor Village project being considered for fast-track referral.

As the existing subdivision consent application is made by the same applicant as that seeking referral, it cannot be considered as a competing application as defined in the FTAA. There are no other applications identified that could be an application competing with the proposed activity.

### 3. Consideration against relevant FTAA section 22 criteria

Section 22(1) of the FTAA sets out the criteria for accepting a referral application as follows:

- (1) The criteria for accepting a referral application are that—*
- (a) the project is an infrastructure or development project that would have significant regional or national benefits; and*
  - (b) referring the project to the fast-track approvals process—*
    - (i) would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and*
    - (ii) is unlikely to materially affect the efficient operation of the fast-track approvals process.*

The applicant's determination in their Application Supporting Document is that Bangor Village is a development project that will have significant regional benefits.

Regional benefits have been determined in the application in consideration of the following from section 22 of the FTAA, and that the project:

- 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) - (s22(2)(iii));
- will deliver significant economic benefits – (s22(2)(iv));
- will support primary industries – (s22(2)(v));
- is consistent with local or regional planning documents, including spatial strategies. – (s22(2)(x)).

#### **Whether the project will increase housing supply, address housing needs, or contribute to a well-functioning urban environment.**

The project proposes to significantly increase the supply of housing in Darfield and the Selwyn District in the short to medium term. We consider that this additional supply is not likely required to meet demand for housing in Darfield in the timeframe of the proposed development (11.5 years).

Selwyn District Council has commissioned a report on the outputs of the Selwyn Residential Capacity and Demand Model, with the report last being updated in March 2024 after the decisions on the District Plan review. The model outputs are used to inform the Councils reporting required under the National Policy Statement on Urban

Development (NPS-UD). The report summarises the development capacity and demand for housing for urban environments within the district. Appendix C of the report provides modelled demand and capacity information for smaller towns and settlements including Darfield. The report is available on the [Council's website](#) .

For Darfield, using a medium growth projection, the short to medium term (ten years to 2033) feasible housing supply from the existing residential zoned land is calculated to be 3,050 with demand of only 630. In the long term (2023 to 2053) feasible housing supply is calculated to be 3,310, with demand of 1,640. In both the medium and long term there is more than enough capacity to meet demand in Darfield. This is similar to most of the smaller towns in the district located outside of the Greater Christchurch urban environment.

Given that there is a projected oversupply of housing capacity in Darfield, increasing the capacity through this project is not considered to serving a housing need within the proposed development timeframe. It is possible that the proposed development could attract growth away from the Greater Christchurch urban environment (e.g. Christchurch or Rolleston) where capacity also exists currently, which will have impacts on growth and development of a well-functioning Greater Christchurch urban environment. The increase in capacity in Darfield on top of current sufficient capacity is unlikely to realise a significant benefit at a regional level.

With regard to the project's contribution to a well-functioning urban environment, it is noted that the Darfield area does not come under the definition of an urban environment as in the NPS-UD and therefore the contribution is likely to be minimal and may have some negative effect on the functioning of the Greater Christchurch urban environment due to transfer of housing demand away from that area.

**Whether the fast-track approvals process would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes**

The referral application's supporting document discusses the timing of the project, and that development of the project could commence as early as twelve months following resource consent being obtained under the FTAA.

The alternative of proceeding with a resource consent application via the usual RMA process administered by the district and regional councils has been considered and the application determines that there could be an up to three years longer timeframe for gaining consent under that option. This potential does though include the possibility of an Environment Court appeal, which would be unusual and is not common for such applications and would represent a possible worst case. Regardless, it is more than

likely that a process under the FTAA will take less time than a standard resource consent process, but the benefit of proceeding through a FTAA process appears to be overstated in terms of timeliness.

It is noted that the alternative approach to consenting the development, did not consider the two-step process of first making a request for a change to the district plan to rezone the site to provide for a higher density of housing development. Once the plan was changed to align with the proposed development, gaining resource consents required would likely follow a more streamlined process that would not likely require further notification and hearings to be approved. This option would though still take some more time for the project to be approved than a subdivision consent considered via the FTAA.

While there is likely to be some benefit to the project in being processed in a timelier way through the FTAA, with the benefits of the project unlikely to meet the threshold of regionally significant there wouldn't appear to be a need to expedite the project through this process.

#### **4. Consistency with local or regional planning documents including spatial strategies.**

The Partially Operative Selwyn District Plan (PODP) is relevant to this project. As the proposed development is at a much higher housing density than is provided for under the Large Lot Residential zoning in the PODP and the related outline development plan for the site. Therefore, the project will be contrary to these aspects of the district plan including subdivision objective SUB-O1 and subdivision policies SUB-P4, SUB-P5.

Urban growth Policy UG-P17 encourages the intensification of urban activities or redevelopment of existing land within urban zones to assist in supporting the district's urban growth needs, including through the implementation of an adopted urban intensification plan or any relevant development plan to satisfy a number of matters listed under the policy. It is noted that the existing development plan for the for the project site (DEV-DA3 – Darfield 3 Development Area) currently provides for development of larger lot sizes, and the density of development proposed would be inconsistent with the requirements of the current development plan. The proposed development may still be consistent with many of the list of matters considered under this policy. Given that urban growth needs are satisfied with the existing growth capacity in Darfield, this policy is not particularly relevant to the current proposal.

#### **5. Conclusion**

While there are likely to be some significant benefits regarding housing supply in Darfield, and economic benefits related to the project, it is unlikely that these benefits meet the threshold of

being at least regionally significant required to be accepted for referral to the fast-track consenting process.

The approvals process under the FTAA will likely be quicker than the standard RMA process, though the timeframe difference may not be considerable, and in the context of the project not being necessary to meet housing demand, there wouldn't appear to be the need for such urgency in the consenting process. If the referral application is not accepted there are options available to proceed with a request to change the zoning of the PODP to align more with the proposed density of development and obtain resource consents following that process.

# Hon James Meager

Minister for the South Island  
Minister for Hunting and Fishing  
Minister for Youth  
Associate Minister of Transport



03 FEB 2026

JMITC-33

Hon Chris Bishop  
Minister for Infrastructure

By email: [infrastructure.Portfolio@parliament.govt.nz](mailto:infrastructure.Portfolio@parliament.govt.nz)

Dear Minister,

Thank you for your invitation to comment on the referral application for Bangor Village [FTAA-2511-1156] under the Fast-track Approvals Act 2024. You have invited me to comment in my capacity as Associate Minister of Transport.

I support the Bangor Village application being referred to the Fast-track process. I consider the project will provide significant regional benefits, including by supplying needed housing stock in one of the fastest growing regions of New Zealand.

I have not considered the operational impact of this proposal on the local transport network. However, I am pleased to see that the applicant is working with NZTA to ensure these matters are properly considered. I encourage the applicant to continue working with NZTA and other road controlling authorities throughout the development of its substantive application.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'J Meager', written over a blue line.

**Hon James Meager**  
Minister for the South Island  
Minister for Hunting and Fishing  
Minister for Youth  
Associate Minister of Transport

# Hon Tama Potaka

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



Hon. Chris Bishop  
Minister for Infrastructure  
c.bishop@ministers.govt.nz  
Parliament Buildings  
Private Bag 18041  
WELLINGTON 6160

Tēnā koe Hon. Bishop

Thank you for your invitation to comment on the fast-track consent application for the Bangor Village project in Darfield, Selwyn. The development would include subdivision to create allotments for 700-800 residential units of mixed typologies and to enable future non-residential activities. It would include landscaping and development of an open space network including reserves and enhancement of an existing water race, and associated infrastructure.

Selwyn District is one of the fastest growing areas in New Zealand. From 2018 to 2023, the district grew by 29%, and this growth is projected to continue at a rapid pace. This project, if approved, would contribute to meeting the future housing needs generated by rapid population growth.

Selwyn District Council's Malvern Area Plan 2031 set out that there are opportunities to facilitate more intensive housing within proximity to the Darfield town centre to better meet the needs of the wider community. The mixed typologies provided through the Bangor Village project appear to be consistent with this aspiration. The Area Plan also expressed that mana whenua support the growth of Darfield as a township that provides economic and social opportunities to live, work, and play.

I am aware that Darfield's wastewater infrastructure was recently upgraded and that one of the purposes of this upgrade was to facilitate further growth. It appears that the Bangor Village project could leverage this upgrade.

From the perspective of the housing portfolio, then, I would support this project being referred to the next stage. Thank you again for the opportunity to comment.

Mauriora,

A handwritten signature in black ink that reads "Tama Potaka". The signature is written in a cursive style and is enclosed within a hand-drawn oval.

Hon Tama Potaka  
**Associate Minister of Housing**

## David Chau

---

**From:** Infrastructure Portfolio  
**Sent:** Friday, 19 December 2025 10:20 am  
**To:** Shane Jones (MIN); Nicola Willis (MIN); Penny Simmonds (MIN); Tama Potaka (MIN); James Meager (MIN); Erica Stanford (MIN)  
**Cc:** FTAreferalls  
**Subject:** CORTP-6514 Invitation to comment on Fast-track referral application for the Bangor Village project under the Fast-track Approvals Act 2024  
**Attachments:** Comments Form for Invited Ministers.docx  
**Categories:** Conservation

To:  
Minister for Economic Growth  
Minister for Regional Development  
Minister for the Environment  
Associate Minister of Housing  
Minister of Transport  
Minster of Conservation  
Minister of Education

Dear Ministers,

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

The Minister has received an application from Hughes Developments Limited for referral of Bangor Village project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2511-1151).

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

### **Invitation to comment on referral application**

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

If you wish to provide written comments, these must be received by **return email** within **20 working days** of receipt of this email, being 9 February 2026. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

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

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application

for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

## Process

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

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

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

## Important Information

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

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

## Project summary

<b>Project name</b>	Bangor Village
<b>Applicant</b>	Hughes Developments Limited
<b>Location</b>	Darfield, Canterbury

<b>Project description</b>	<p>The project is to subdivide and develop land for the purpose of establishing a master-planned community at 160 Bangor Road (SH77), Darfield, Selwyn. The project will include works within the SH77 road reserve.</p> <p>The project will be applied for as a single substantive application but will be delivered in multiple stages. The project will include:</p> <ul style="list-style-type: none"><li>a. subdivision to create approximately 700-800 allotments and enable construction of approximately 700-800 residential units across a range of densities (which may be constructed by a person or persons other than the applicant)</li><li>b. subdivision to create allotments for future non-residential activities (which may include community and commercial activities, and a school)</li><li>c. landscaping and development of an open space network including reserves and enhancement of an existing water race</li><li>d. associated infrastructure, including for three waters services and transport (including external site access works).</li></ul>
----------------------------	--

Yours sincerely

Hon Chris Bishop  
**Minister for Infrastructure**



**Office of Hon Chris Bishop**

Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport | Associate Minister of Finance | Associate Minister for Sport & Recreation | Leader of the House | MP for Hutt South

Office: 04 817 6802 | EW 6.3

Email: [c.bishop@ministers.govt.nz](mailto:c.bishop@ministers.govt.nz) Website: [www.Beehive.govt.nz](http://www.Beehive.govt.nz)

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

**Email disclaimer:**

This email communication is confidential between the sender and the recipient. The intended recipient may not distribute it without the permission of the sender. If this email is received in error, it remains confidential and you may not copy, retain or distribute it in any manner. Please notify the sender immediately and erase all copies of the message and all attachments. Thank you.

# Hon Nicola Willis

Minister of Finance  
Minister for Economic Growth  
Minister for Social Investment



28 JAN 2026

Hon Chris Bishop  
Minister for Infrastructure  
Parliament Buildings  
Wellington

REQ-0026255

Dear Chris

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

Out of Scope

- Bangor Village, FTAA-2511-1151

Out of Scope

I am providing comments in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to have significant economic benefits under section 22(2)(a)(iv) of the FTAA, based on the information provided. I defer to you and other relevant Ministers to assess the remaining criteria.

Out of Scope

Out of Scope

***Bangor Village, FTAA-2511-1151***

This proposal is for a 700 – 800 home development in Darfield, Selwyn, to be constructed over an 11.5 year development period.

According to the economic assessment provided by the applicant, the project is expected to have a \$258 – \$295 million net present value and provide the equivalent of approximately 62 direct full-time jobs for the duration of the development period. The project is also expected to provide the equivalent of 223 indirect and induced full time jobs during the same development period.

The primary long-term benefit of this proposal is the provision of additional housing which is critical for a growing economy. Given that this application would provide a significant boost in the housing supply, it could also be assessed under increasing the supply of housing, address housing needs, or contribute to a well-functioning urban environment (s22(2)(a)(iii) of the Fast-track Approvals Act).

Out of Scope

Out of Scope

Out of Scope

Out of Scope

Yours sincerely

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

Hon Nicola Willis  
**Minister for Economic Growth**

# Hon Shane Jones

---

Minister for Oceans and Fisheries  
Minister for Regional Development  
Minister for Resources  
Associate Minister of Finance  
Associate Minister for Energy



11 February 2026

Hon Chris Bishop  
Minister for Infrastructure  
Parliament Buildings  
Wellington

## **Fast-track Approvals Act 2024 – Bangor Village referral application (FTAA-2511-1151)**

Dear Chris

Thank you for the opportunity to comment on this referral application under the Fast-track Approvals Act 2024 (FTAA 2024).

The FTAA 2024 has been established to provide a regime that makes it easier and quicker for regionally and nationally significant infrastructure projects to gain the approvals needed for development, in support of this Government's economic growth objectives.

I have considered the application and its alignment with the priorities of my Regional Development portfolio. My comments are attached as Annex One.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Shane Jones'.

Hon Shane Jones  
**Minister for Regional Development**

## **Annex One – Regional Development comments**

---

### **Project overview**

1. The Bangor Village application is for a project to subdivide and develop land for the purposes of establishing a 130.4-hectare master-planned community at 160 Bangor Road, Darfield, Selwyn (Canterbury). The project includes:
  - a. subdivision to create approximately 700-800 allotments and enable construction of approximately 700-800 residential units across a range of densities
  - b. subdivision to create allotments for future non-residential activities, such as community and commercial activities, and a school
  - c. landscaping and an open-space network
  - d. associated infrastructure, such as water services and transport.
2. The application states that Selwyn has been New Zealand's fastest growing district for the last decade, with the majority of new housing being delivered in Rolleston and Lincoln, but with ongoing demand forecast to continue, Darfield is becoming of greater interest to developers.
3. The applicant provided an independent assessment of the potential economic impacts, which estimates that, on top of the benefit to the housing market from the new residential units and value of the community network, the project will:
  - a. catalyse between \$258 million and \$295 million of total direct, indirect and induced value added for the regional economy (estimated net present value, based on an eight per cent discount rate)
  - b. create total employment for an average of 285-325 full-time workers over the estimated 11.5-year development period.
4. The economic assessment acknowledges that the proposed development may be transferring economic impacts that would have been generated on other residential development sites, depending on when development occurs.

### **Regional Development comments**

5. Based on the information provided by the applicant, there are expected to be significant economic impacts on the Selwyn District from the Bangor Village project's development, and some ongoing employment and economic value from the resulting assets.
6. You may wish to suggest the applicant provide further information on how the proposed development and its resulting dwellings will impact on local resource availability, and how this might subsequently impact on existing communities and businesses.

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

Project name	Bangor Village
--------------	----------------

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

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
<b>Organisation name</b>	Department of Conservation		
<b>*First name</b>	Shawn		
<b>*Last name</b>	Gardner		
<b>Postal address</b>			
<b>*Contact phone number</b>	s 9(2)(a)	<b>Alternative</b>	
<b>*Email</b>	<a href="mailto:Fast-track@doc.govt.nz">Fast-track@doc.govt.nz;</a>		

2. Please provide your comments on this application
Comments follow overleaf.

### Manager's signoff

Jenni Fitzgerald

9 February 2026

## Director-General of Conservation s17 comments

<b>Project name</b>	Bangor Village
<b>Applicant name</b>	Hughes Developments Limited
<b>Application number</b>	FTAA-2511-1151
<b>Project summary details</b>	<p>The Bangor Village project is a proposal to subdivide and develop land for the purpose of establishing a master-planned community at 160 Bangor Road (State Highway 77), Darfield, Selwyn.</p> <p>The project will include:</p> <ol style="list-style-type: none"> <li>a. Subdivision to create approximately 700 – 800 allotments and enable construction of approximately 700 – 800 residential units across a range of densities (which may be constructed by a person or persons other than the applicant)</li> <li>b. Subdivision to create allotments for future non-residential activities (which may include community and commercial activities, and a school)</li> <li>c. Landscaping and development of an open space network including reserves and enhancement of an existing water race</li> <li>d. Associated infrastructure, including for three waters services and transport (including external site access works)</li> </ol> <p>No Public Conservation Land has been identified on the Site</p> <p>Wildlife approval is sought for the handling, capture and relocation of lizards 'and any other wildlife' under the Wildlife Act 1953.</p>

### 1 General comment

- 1.1.1 As the project includes an approval under a specified Act for which DOC is the administering agency, the applicant was required to undertake pre-lodgement consultation in accordance with section 11(e) of the Fast-track Approvals Act (FTAA).

- 1.1.2 A meeting between DOC and the Applicant’s Agent occurred on the 29<sup>th</sup> of October wherein the Applicant provided an overview of the project. The Applicant provided a draft masterplan and draft aquatic ecology memo. DOC provided a formal pre-lodgement consultation summary to the Applicant on the 6<sup>th</sup> of November.
- 1.1.3 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, DOC considers that it is likely that with the appropriate design and conditions, effects can be managed to appropriate levels.
- 1.1.4 DOC is not aware of any reason the project should not be referred.

## 2 Minister’s decision on referral application

- 2.1.1 FTAA sections 21 and 22 set out matters to be considered in determining whether a referral application should be accepted.
- 2.1.2 DOC notes that other agencies are better placed to comment on most matters. Comments below are limited to sections where DOC has specific interests or information relevant to the Minister’s decision.
- 2.1.3 DOC has considered the criteria in section 22 and has not identified anything it considers the Minister should take into account that has not already been acknowledged by the Applicant in its referral application.
- 2.1.4 DOC has the following comments on sections 21(3) and (4), and section 22:

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	DOC has considered section 5(1) (f), (h), (i), (j) and (k). DOC has not identified any aspect of the project that would be considered ineligible under these sections.
21(3)(c)	Is there adequate information to inform a decision	<p>The Applicant provided a high-level aquatic ecology memo prepared by Aquatic Ecology to DOC that was not included in the referral application. This memo provides a broad survey of the aquatic habitats at the site. This report serves as a baseline assessment of the aquatic values. The report indicates that there are two freshwater races onsite with the presence of upland bully. The applicant has indicated a likely presence of lizard habitat onsite.</p> <p>If the project is referred, detailed ecological surveys (including for lizards, fish and avifauna) should be done with methodologies and results provided in the substantive application. This will inform what wildlife approvals will be required for the project. Confirmation should be provided in the substantive application of any</p>

## UNCLASSIFIED

Section	Criteria	Comments
		works proposed within waterways or wetlands, including enhancement activities. It is recommended that the applicant provide a stocktake of any current fish barriers onsite and advise of any works to remove or alter them.  DOC considers the information to be adequate in terms of a referral decision.
21(4)	Are there any other reasons not specified	DOC has not identified any other reasons why the project should not be referred.
21(5)(a)	Is the project inconsistent with: <ul style="list-style-type: none"> <li>• a Treaty settlement;</li> <li>• Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019;</li> <li>• Marine and Coastal Area (Takutai Moana) Act 2011.</li> </ul>	DOC has not identified any inconsistency with any relevant settlement or other obligation. Relevant Treaty Settlement Acts are: <ul style="list-style-type: none"> <li>• Ngāi Tahu Claims Settlement Act 1998</li> </ul>
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	DOC has not identified any reason why wildlife approval should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Based on our knowledge of the existing environment and species expected to occur on the site, our understanding of the project, and our experience of the kinds of measures and conditions that could be implemented, we consider that once more detailed information is available, it would be possible to achieve a project with the imposition of conditions (that are appropriate, enforceable, include best management practice, and apply the relevant ecological management plans, where required), that does not have significant adverse effects on the environment.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the Applicant's compliance history under the Wildlife Act 1953.
21(5)(g)	Would a substantive application have any competing applications	No competing applications relating to wildlife approvals have been identified.

Section	Criteria	Comments
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	A Wildlife Act approval would generally take approximately three to four months to process, which is not significantly longer than the FTAA process is expected to take. However, there may be benefits for the Applicant in terms of consideration being combined with RMA approvals (rather than being advanced by a separate process) and given the different decision-making framework under the FTAA.
22(2)(a)(ix)	Will this project address significant environmental issues?	No.
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	<p>The application is not inconsistent with the relevant statutory planning provisions. However, consideration needs to be given to the:</p> <ul style="list-style-type: none"> <li>• Management of any threatened and at-risk species that may be found on the site to ensure their persistence;</li> <li>• Protection of freshwater fisheries, fish habitat and fish passage;</li> <li>• Preservation of threatened indigenous freshwater species.</li> </ul>
22(b)	Any other matters the Minister may consider as relevant?	No other project specific matters which may be of importance for the Minister to consider have been identified.

### 3 Other considerations

3.1.1 DOC has provided input to a number of fast-track projects to date where additional conservation approvals that would have been available under the FTAA have not been included in a substantive application. In some cases, it has been necessary for applicants to

UNCLASSIFIED

seek additional approvals via normal processing. This can result in inefficiencies, additional costs and undermining the benefits of the 'one stop shop' approach of the FTAA.

- 3.1.2 DOC considers the Applicant should consider whether it should seek to include additional approvals that may be required for the project, and suggests the Minister should consider whether further information should be sought from the Applicant
- 3.1.3 DOC recommends consideration of whether any culverts or works within waterways might require complex freshwater fisheries approval, as highlighted to the Applicant as part of the pre-lodgement consultation. The referral application currently indicates that no approvals are sought under the Freshwater Fisheries Regulations 1983.
- 3.1.4 Given the lack of specific detail in the referral application, DOC considers it would be highly beneficial for the Applicant to engage further with DOC as it relates to any conservation approvals (as well as conservation matters subject to RMA consideration) prior to making any substantive application. Benefits include ensuring information necessary to support decision-making with respect to conservation approvals is included; supporting the management of any actual and potential adverse effects on the environment; and early identification and resolution of any issues.

#### **4 Matters for the Minister to specify (s27)**

- 4.1.1 None identified.



Jenni Fitzgerald  
Fast-Track Applications Manager

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

Date: 9 February 2026

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

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

<b>Project name</b>	Bangor Village
---------------------	----------------

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

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
<b>Organisation name (if relevant)</b>	NZ Transport Agency		
<b>*First name</b>	Nicola		
<b>*Last name</b>	Foran		
<b>Postal address</b>			
<b>*Contact phone number</b>	s 9(2)(a)	<b>Alternative</b>	
<b>*Email</b>	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application
<p>NZTA thanks the Minister for the opportunity to comment on the referral of this application into the fast track approvals process.</p> <p>NZTA has had pre-application engagement with the applicant regarding this project. Hughes Developments Ltd's (HDL) planner met with NZTA representatives on 19 September 2025 to discuss the key aspects of the project, including the proposed acoustic treatment along the application site's boundaries with SH77 and SH73. Those representatives advised that, at this stage, they did not have specific feedback but requested that HDL continues to keep NZTA informed of progress with the referral application, and if the project is referred, the substantive application.</p> <p>As per the matters set out in the invitation to comment, NZTA provides the following commentary:</p> <p><i>1. Whether the project is likely to adversely affect the operation of the State Highway network</i></p> <p>NZTA would need to see the substantive application to be able to determine actual impacts on the state highway network, however developments of this nature usually impact the network through increased heavy vehicle movements during site development and construction, and a sustained</p>

Insert Fast-track logo

increase in traffic volumes at the completion of the development due to occupation of the proposed residential lots.

As part of the substantive application, NZTA would expect to see an updated comprehensive Integrated Transport Assessment prepared, along with a construction management plan, and mitigation measures to address any adverse effects on the state highway network (State Highway 77 and 73) resulting from this development, including dust.

*2. Whether you consider there are any barriers to the applicant delivering the project*

NZTA has no prior experience with this applicant regarding this project, other than some pre-application engagement in September 2025.

The traffic generation from this site is significant and would likely double the number of vehicles currently using the road network.

Whether any upgrades to the state highway network are required to accommodate the development (either for construction or operation) cannot be determined without further information. Detailed modelling will be required to confirm whether, and the extent to which, upgrades are required, along with an updated Integrated Traffic Assessment (ITA). If upgrades are required, the developer would be required to work with NZTA and fund any works required.

*3. General comments on the referral application*

The ITA does not currently contain any modelling for intersection performance. This will need to be provided as part of the updated ITA (as acknowledged in the ITA) along with the need to consult with NZTA.

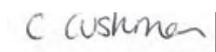
There is a lack of footpaths connecting the proposal to the main Darfield township. This creates a potential safety risk for pedestrians, due to a lack of safe access to the main township of Darfield.

Overall, based on the information provided, NZTA has no concerns with this project, Bangor Village, being referred into the fast track approvals process.

NZTA would welcome the opportunity to provide comments on any substantive application in due course.

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

**Managers signoff**



Carly Cushman

Date: 05/02/2026