

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

Project name	Beachgrove Kaiapoi Expansion Project
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All sections of this form with an asterisk (*) must be completed.

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

2. Please provide your comments on this application
<p>Kia ora Ilana,</p> <p>Thank you for your letter received 14 August 2025 regarding the Beachgrove Kaiapoi Expansion project from Momentum Land Limited.</p> <p>Please find the response to the specific questions raised in the above letter from the Canterbury Regional Council (CRC).</p> <p><i>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.</i></p> <p>The CRC does not hold a record of any competing applications (per the definition in the Fast Track Approval Act 2024 (FTAA)) in the same project area which have been approved.</p>

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

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

Whether the project would have significant regional or national benefits (refer to section 22 of the Act for the criteria for assessing referral applications). Additionally, and in this context, provide any high-level commentary regarding the project's alignment with the Council's relevant plans, policies, and/or strategies (including any proposed plans).

The application has been assessed against the criteria set out in section 22(2)(a) of the FTAA. In particular, the criterion under section 22(2)(a)(iii) “*will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of Policy 1 of the National Policy Statement on Urban Development 2020)*” is considered relevant to this referral application.

The CRC has assessed the application against the Canterbury Regional Policy Statement (**CRPS**) to determine whether the proposed housing development aligns with the intent of section 22(2)(a)(iii) of the FTAA. Although the CRPS defines what constitutes *regionally significant infrastructure*, it does not provide specific direction or criteria for treating housing development as regionally significant, and housing is not included within that definition. Nevertheless, the proposal has been assessed against the relevant CRPS provisions and is considered broadly consistent with the outcomes sought under the FTAA and is generally aligned with the direction set in the policy statement.

In addition, the CRC has assessed the alignment of the proposal against the relevant objectives and policies of the Canterbury Land and Water Regional Plan (**LWRP**). Overall, the referral application is considered broadly consistent with both planning instruments. The planning assessments against the CRPS and LWRP is provided in Appendix 1 and Appendix 2, respectively.

The 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.

A handwritten signature in black ink, appearing to read 'Tim Davie', with a stylized, cursive script.

Tim Davie

Date: 11 September 2025

Acting Director Operations

Appendix 1: Consistency with Canterbury Regional Policy Statement (CRPS)

Relevant definitions in the CRPS:

Definition	Relevance to the Beachgrove project proposal
<p>Hazardous activity or industry <i>An activity or industry that appears on the Hazardous Activity and Industry List (HAIL) 2004. The HAIL is published as Schedule A in the Contaminated Land Management Guidelines - Ministry for the Environment (2004) updated September 2007.</i></p>	<p>The site has identified HAIL locations.</p> <p>The Applicant has indicated that the contamination has been remediated.</p>
<p>“High hazard areas” are:</p> <ol style="list-style-type: none">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% AEP flood event;2. land outside of greater Christchurch subject to coastal erosion over the next 100 years; and3. land within greater Christchurch likely to be subject to coastal erosion including the cumulative effects of sea level rise over the next 100 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>This site has been identified as being within the localised flooding overlay in the Operative Waimakariri District Plan and within both the Urban and Coastal Flood Assessment overlay in the Partially Operative Waimakariri Plan.</p> <p>A site specific assessment would need to 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>The Applicant has indicated that they have undertaken a hazard assessment for the site and will be proposing hazard mitigation has part of their proposal.</p>

<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>Modelling indicates that the District is not susceptible to coastal erosion over the next 100 years, even when accounting for climate change.</p>
<p>Greater Christchurch</p> <p>Greater Christchurch means the districts of the Christchurch City Council, the Selwyn District Council, and the Waimakariri District Council, and includes the coastal marine area adjacent to these districts, as defined in the Canterbury Earthquake Recovery Act 2011 and as shown on Map A.</p>	<p>The proposed site is within the Waimakariri District which falls within Greater Christchurch.</p>
<p>Future Development Areas</p> <p>means an area identified on Map A as a Future Development Area.</p>	<p>Most of the proposed site falls within a Future Development Area.</p>
<p>Greenfield development</p> <p>means subdivision, use and/or development of land identified on Map A as a Greenfield Priority Area.</p>	<p>Part of the site falls within a Greenfield Priority Area.</p>
<p>Noise sensitive activities</p>	<p>The proposal comprises of new residential development and as such classified as a noise sensitive activity.</p>

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<p>means</p> <ul style="list-style-type: none">• Residential activities other than those in conjunction with rural activities that comply with the rules in the relevant district plan as at 23 August 2008;• Education activities including pre-school places or premises, but not including flight training, trade training or other industry related training facilities located within the Special Purpose (Airport) Zone in the Christchurch District Plan;• Travellers' accommodation except that which is designed, constructed and operated to a standard that mitigates the effects of noise on occupants;• Hospitals, healthcare facilities and any elderly persons housing or complex. <p>But does not include:</p> <ul style="list-style-type: none">• Commercial film or video production activity.	
<p>Outline development plan</p> <p>means a plan prepared for the development of a Greenfield Priority Area, Future Development Area, or Rural Residential Development in the manner outlined in Policy 6.3.9. It shall include maps, plans, and other descriptive and illustrative</p>	<p>As the site falls within a Greenfield Priority Area and Future Development Area, an outline development plan is required to be prepared in accordance with Policy 6.3.9 and 6.3.3 of the CRPS.</p>

material as necessary to convey the information referred to in Policy 6.3.9.	
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Objective and Policy Assessment:

Objective/ Policy	Assessment
Chapter 6 – Recovery and Rebuilding of Greater Christchurch	
<p>6.2.1 Recovery framework</p> <p>Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:</p> <ol style="list-style-type: none"> 1. identifies priority areas for urban development within Greater Christchurch; 2. identifies Key Activity Centres which provide a focus for high quality, and, where appropriate, mixed-use development that incorporates the principles of good urban design; 3. avoids urban development outside of existing urban areas or greenfield priority areas for development, unless expressly provided for in the CRPS; 	<p>CRC considers the proposal generally supports objective 6.2.1 of the CRPS for the following reasons:</p> <p>Consolidated Urban Form</p> <ul style="list-style-type: none"> ○ The development is located within the existing urban environment, supporting a compact and consolidated urban form. ○ The mix of conventional housing, higher-density retirement village units, and a neighbourhood commercial centre increases residential capacity without dispersing growth into rural areas. <p>Integration with Infrastructure</p> <ul style="list-style-type: none"> ○ The proposal makes use of existing and planned Council infrastructure, consistent with the CRPS

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<p>4. protects outstanding natural features and landscapes including those within the Port Hills from inappropriate subdivision, use and development;</p> <p>5. protects and enhances indigenous biodiversity and public space;</p> <p>6. maintains or improves the quantity and quality of water in groundwater aquifers and surface waterbodies, and quality of ambient air;</p> <p>7. maintains the character and amenity of rural areas and settlements;</p> <p>8. protects people from unacceptable risk from natural hazards and the effects of sea-level rise;</p> <p>9. integrates strategic and other infrastructure and services with land use development;</p> <p>10. achieves development that does not adversely affect the efficient operation, use, development, appropriate upgrade, and future planning of strategic infrastructure and freight hubs;</p> <p>11. optimises use of existing infrastructure; and</p> <p>12. provides for development opportunities on Māori Reserves in Greater Christchurch.</p>	<p>emphasis on integrated land use and infrastructure planning.</p> <ul style="list-style-type: none">○ New roading and pedestrian networks are designed to connect with existing transport routes and active transport links, further reinforcing integration. <p>Avoiding Adverse Effects on Significant Resources</p> <ul style="list-style-type: none">○ The site is partly within a Greenfield Priority Area (identified in Map A of the CRPS), where development is anticipated.○ Stormwater design, ecological restoration, and native planting help protect and enhance natural values, mitigating potential adverse effects.○ CRC notes the site does, however, overlap with the Airport Noise Contour, which the CRPS identifies as a constraint. While part of the site is exempt (greenfield priority area), the Future Development Area portion remains subject to noise-sensitive activity restrictions, which may present inconsistency with the objective's requirement to protect strategic infrastructure.
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Objective 6.2.2 Urban form and settlement pattern

The urban form and settlement pattern in Greater Christchurch is managed to provide sufficient land for rebuilding and recovery needs and set a foundation for future growth, with an urban form that achieves consolidation and intensification of urban areas, and avoids unplanned expansion of urban areas, by:

1. aiming to achieve the following targets for intensification as a proportion of overall growth through the period of recovery:

a. 35% averaged over the period between 2013 and 2016

b. 45% averaged over the period between 2016 to 2021

c. 55% averaged over the period between 2022 and 2028;

2. providing higher density living environments including mixed use developments and a greater range of housing types, particularly in and around the Central City, in and around Key Activity Centres, and larger neighbourhood centres, and in greenfield priority areas, Future Development Areas and brownfield sites;

3. reinforcing the role of the Christchurch central business district within the Greater Christchurch area as identified in the Christchurch Central Recovery Plan;

CRC notes the proposal is largely consistent with Objective 6.2.2, in that it:

- Promotes a sustainable, resilient urban form;
- Is integrated with existing and planned infrastructure; and
- Incorporates environmental mitigation and ecological enhancement.

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<p>4. providing for the development of greenfield priority areas, and of land within Future Development Areas where the circumstances set out in Policy 6.3.12 are met, on the periphery of Christchurch’s urban area, and surrounding towns at a rate and in locations that meet anticipated demand and enables the efficient provision and use of network infrastructure;</p> <p>5. encouraging sustainable and self-sufficient growth of the towns of Rangiora, Kaiapoi, Woodend, Lincoln, Rolleston and Prebbleton and consolidation of the existing settlement of West Melton;</p> <p>6. Managing rural residential development outside of existing urban and priority areas; and</p> <p>7. Providing for development opportunities on Māori Reserves.</p>	
<p>6.3.1 Development within the Greater Christchurch area</p> <p>In relation to recovery and rebuilding for Greater Christchurch:</p> <p>1. give effect to the urban form identified in Map A, which identifies the location and extent of urban development that will support recovery, rebuilding and planning for future growth and infrastructure delivery;</p>	<p>CRC considers the proposal is partially consistent with Policy 6.3.1:</p> <ul style="list-style-type: none">• It aligns strongly with consolidation, infrastructure integration, and provision of housing choice.• It partially aligns with location criteria, as only part of the site is within a Greenfield Priority Area; the remainder in a Future Development Area is not directly supported by this policy.

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| <ol style="list-style-type: none">2. give effect to the urban form identified in Map A (page 6-27) by identifying the location and extent of the indicated Key Activity Centres;3. enable development of existing urban areas and greenfield priority areas, including intensification in appropriate locations, where it supports the recovery of Greater Christchurch;4. ensure new urban activities only occur within existing urban areas or identified greenfield priority areas as shown on Map A, unless they are otherwise expressly provided for in the CRPS;5. provide for educational facilities in rural areas in limited circumstances where no other practicable options exist within an urban area;6. provide for commercial film or video production activities in appropriate commercial, industrial and rural zones within the Christchurch District;7. provide for a metropolitan recreation facility at 466-482 Yaldhurst Road; and8. avoid development that adversely affects the function and viability of, or public investment in, the Central City and Key Activity Centres. | |
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Policy 6.3.2 Development form and urban design

Business development, residential development (including rural residential development) and the establishment of public space is to give effect to the principles of good urban design below, and those of the NZ Urban Design Protocol 2005, to the extent appropriate to the context:

1. Tūrangawaewae – the sense of place and belonging – recognition and incorporation of the identity of the place, the context and the core elements that comprise the Through context and site analysis, the following elements should be used to reflect the appropriateness of the development to its location: landmarks and features, historic heritage, the character and quality of the existing built and natural environment, historic and cultural markers and local stories.

2. Integration – recognition of the need for well-integrated places, infrastructure, movement routes and networks, spaces, land uses and the natural and built environment. These elements should be overlaid to provide an appropriate form and pattern of use and development.

3. Connectivity – the provision of efficient and safe high quality, barrier free, multimodal connections within a development, to surrounding areas, and to local facilities and services, with

CRC considers the proposal is consistent with Policy 6.3.2 of the CRPS for the following reasons:

Integration with Infrastructure

- The applicant has noted that the project is supported by existing and planned Council infrastructure for water supply, wastewater and stormwater management.
- Transport connections will integrate with Kaiapoi's existing roading and pedestrian networks, ensuring efficient use of infrastructure.

Consolidated, Well-Designed, Sustainable Growth

- Located less than 1 km from Kaiapoi town centre, the proposal reinforces consolidation of urban development close to services and amenities.
- The inclusion of an ecological restoration reserve, stormwater basins, and native planting demonstrates a commitment to environmentally sustainable design.
- New pedestrian and open space networks improve connectivity and walkability, aligning with sustainable urban form principles.

Housing Choice and Community Needs

<p>emphasis at a local level placed on walking, cycling and public transport as more sustainable forms of</p> <p>4. Safety – recognition and incorporation of Crime Prevention Through Environmental Design (CPTED) principles in the layout and design of developments, networks and spaces to ensure safe, comfortable and attractive places.</p> <p>5. Choice and diversity – ensuring developments provide choice and diversity in their layout, built form, land use housing type and density, to adapt to the changing needs and circumstances of the population.</p> <p>6. Environmentally sustainable design – ensuring that the process of design and development minimises water and resource use, restores ecosystems, safeguards mauri and maximises passive solar gain.</p> <p>7. Creativity and innovation – supporting opportunities for exemplar approaches to infrastructure and urban form to lift the benchmark in the development of new urban areas in the Christchurch region.</p>	<ul style="list-style-type: none"> ○ The proposal offers a diverse housing mix, including standard residential lots, retirement villas, apartments, care suites, and dementia facilities. ○ A neighbourhood commercial centre is included, providing for everyday retail and service needs within walking distance. ○ This variety responds to the demographic and social needs of the Kaiapoi community, particularly an ageing population. <p>Access to Services, Employment, and Transport</p> <ul style="list-style-type: none"> ○ Proximity to Kaiapoi town centre (1 km) and Christchurch (17 km) means residents have access to a wide range of services and employment opportunities. ○ Internal roading and pedestrian networks integrate with surrounding areas, enabling walking and cycling. ○ The project location is well placed for connection to regional transport corridors, supporting Policy 6.3.2's emphasis on accessibility.
<p>Policy 6.3.3 Development in accordance with outline development plans</p>	<p>CRC considers the proposal is consistent with this policy as the applicant has indicated the development of the site will be undertaken in accordance with an ODP that has been prepared in accordance with the relevant criteria under Policy 6.3.3.</p>

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<p>Policy 6.3.4 Transport effectiveness</p> <p>Ensure that an efficient and effective transport network that supports business and residential recovery is restored, protected and enhanced so that it maintains and improves movement of people and goods around Greater Christchurch by:</p> <ol style="list-style-type: none">1. avoiding development that will overload strategic freight routes;2. providing patterns of development that optimise use of existing network capacity and ensuring that, where possible, new building projects support increased uptake of active and public transport, and provide opportunities for modal choice;3. providing opportunities for travel demand management;4. requiring integrated transport assessment for substantial developments; and5. improving road user safety.	<p>CRC consider the proposal is consistent with Policy 6.3.4 because it:</p> <ul style="list-style-type: none">• Integrates land use with transport,• Reduces reliance on private vehicles by enabling local access to services,• Provides for walking, cycling, and access to public transport, and• Supports the safe and efficient functioning of both local and regional transport networks.
<p>Policy 6.3.5 Integration of land use and infrastructure</p> <p>Recovery of Greater Christchurch is to be assisted by the integration of land use development with infrastructure by:</p>	<p>Policy 6.3.5(4) of the CRPS provides an exception for noise-sensitive activities located within existing residentially zoned urban areas, the residential greenfield area identified for Kaiapoi, or residential greenfield priority areas shown on Map A. CRC notes that the proposal is located within the Airport Noise Contour identified in Map A of the CRPS.</p>

<p>1. Identifying priority areas for development and Future Development Areas to enable reliable forward planning for infrastructure development and delivery;</p> <p>2. Ensuring that the nature, timing and sequencing of new development are co-ordinated with the development, funding, implementation and operation of transport and other infrastructure in order to:</p> <ul style="list-style-type: none"> a. optimise the efficient and affordable provision of both the development and the infrastructure; b. maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure; c. protect investment in existing and planned infrastructure; d. ensure that new commercial film or video production facilities are connected to reticulated water and wastewater systems; and e. ensure new development does not occur until provision for appropriate infrastructure is in place; <p>3. Providing that the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained;</p>	<p>While part of the site falls within a greenfield priority area and is therefore exempt from the noise-sensitive activity restrictions, much of the site is classified as a Future Development Area. This classification is not explicitly exempt and remains subject to the policy direction to avoid new noise-sensitive development.</p>
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<p>4. Only providing for new development that does not affect the efficient operation, use, development, appropriate upgrading and safety of existing strategic infrastructure, including by avoiding noise sensitive activities within the 50dBA Ldn airport noise contour for Christchurch International Airport, unless the activity is within an existing residentially zoned urban area, residential greenfield area identified for Kaiapoi, or residential greenfield priority area identified in Map A (page 6-28) and enabling commercial film or video production activities within the noise contours as a compatible use of this land; and</p> <p>5. Managing the effects of land use activities on infrastructure, including avoiding activities that have the potential to limit the efficient and effective, provision, operation, maintenance or upgrade of strategic infrastructure and freight hubs.</p>	
<p>Policy 6.3.7 Residential location, yield and intensification</p> <p>In relation to residential development opportunities in Greater Christchurch:</p> <p>1. Subject to Policy 5.3.4, Policy 6.3.5, and Policy 6.3.12, residential greenfield development shall occur in accordance with Map A.</p> <p>2. Intensification in urban areas of Greater Christchurch is to be focused around the Central City, Key Activity Centres and neighbourhood centres commensurate with their scale and</p>	<p>The proposal is partially consistent with Policy 6.3.7:</p> <ul style="list-style-type: none">• It is consistent as part of the site falls within a Greenfield Priority Area, where residential development is anticipated and exempt from the noise-sensitive restriction.• It is inconsistent for the larger portion of the site that lies in a Future Development Area within the airport noise contour, where Policy 6.3.5 which is referenced in this policy directs that new noise-sensitive activities should be avoided.

function, core public transport routes, mixed-use areas, and on suitable brownfield land.

3. Intensification developments and development in greenfield priority areas shall achieve at least the following residential net densities averaged over the whole of an ODP area (except where subject to an existing operative ODP with specific density provisions):

a. 10 household units per hectare in greenfield areas in Selwyn and Waimakariri District;

b. 15 household units per hectare in greenfield areas in Christchurch City;

4. Intensification development within Christchurch City to achieve an average of:

a. 50 household units per hectare for intensification development within the Central City;

b. 30 household units per hectare for intensification development elsewhere.

5. Provision will be made in district plans for comprehensive development across multiple or amalgamated sites.

6. Housing affordability is to be addressed by providing sufficient intensification and greenfield land to meet housing demand,

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<p>enabling brownfield development and providing for a range of lot sizes, densities and appropriate development controls that support more intensive developments such as mixed use developments, apartments, townhouses and terraced housing.</p>	
<p>Policy 6.3.12 Future Development Areas</p> <p>Enable urban development in the Future Development Areas identified on Map A, in the following circumstances:</p> <p>1. It is demonstrated, through monitoring of housing and business development capacity and sufficiency carried out collaboratively by the Greater Christchurch Partnership or relevant local authorities, that there is a need to provide further feasible development capacity through the zoning of additional land in a district plan to address a shortfall in the sufficiency of feasible residential development capacity to meet the medium term housing bottom lines set out in Table 6.1, Objective 6.2.1a; and</p> <p>2. The development would promote the efficient use of urban land and support the pattern of settlement and principles for future urban growth set out in Objectives 6.2.1 and 6.2.2 and related policies including by:</p> <p>a. Providing opportunities for higher density living environments, including appropriate mixed use development, and housing choices that meet the needs of people and communities for a range of dwelling types; and</p>	<p>The proposal is generally consistent with Policy 6.3.12, provided that development is advanced through or alongside an outline development plan process that:</p> <ul style="list-style-type: none">• Confirms integration with district plan provisions,• Demonstrates that infrastructure capacity is available, and• Ensures that urban form outcomes are achieved. <p>The majority of the proposal site is identified as a Future Development Area in the CRPS. This means development here is subject to Policy 6.3.12, and can only proceed when supported by an outline development plan (ODP) that demonstrates consistency with CRPS objectives and policies.</p> <p>The proposal includes a clear structure plan-style layout with:</p> <ul style="list-style-type: none">○ roading and pedestrian networks integrated with surrounding areas,○ stormwater basins and reticulated systems,

<p>b. Enabling the efficient provision and use of network infrastructure; and</p> <p>3. The timing and sequencing of development is appropriately aligned with the provision and protection of infrastructure, in accordance with Objective 6.2.4 and Policies 6.3.4 and 6.3.5; and</p> <p>4. The development would occur in accordance with an outline development plan and the requirements of Policy 6.3.3; and</p> <p>5. The circumstances set out in Policy 6.3.11(5) are met; and</p> <p>6. The effects of natural hazards are avoided or appropriately mitigated in accordance with the objectives and policies set out in Chapter 11.</p>	<ul style="list-style-type: none"> ○ ecological restoration reserves and open space networks, ○ a neighbourhood commercial centre, and ○ staged servicing aligned with Council infrastructure upgrades. <p>These elements reflect the ODP principles anticipated by Policy 6.3.12.</p> <p>The proposal provides for stormwater, wastewater, and water supply in coordination with existing and planned Council upgrades. This aligns with Policy 6.3.12's requirement that FDA development only occurs when infrastructure can be efficiently and sustainably provided. The site is placed to support consolidated growth.</p> <p>The applicant proposed higher density living options which is consistent with compact and efficient urban form. The mix of housing, commercial, and open space contributes to a self-sustaining and integrated neighbourhood, consistent with the intent of FDA planning.</p>
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Chapter 11 – Natural Hazards	
<p>Objective 11.2.1 Avoid new subdivision, use and development of land that increases risks associated with natural hazards</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>	<p>This site has been identified as being within the localised flooding overlay in the Operative Waimakariri District Plan and within both the Urban and Coastal Flood Assessment overlay in the Partially Operative Waimakariri Plan.</p> <p>A site specific assessment would need to 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>The Applicant has indicated that they have undertaken a hazard assessment for the site and will be proposing hazard mitigation has part of their proposal. This assessment and the proposed mitigation should ideally be reviewed and verified.</p>
<p>Policy 11.3.1 Avoidance of inappropriate development in high hazard areas</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> <p>1. is not likely to result in loss of life or serious injuries in the event of a natural hazard occurrence; and</p>	<p>As noted above, an assessment is required to determine whether the proposed site falls within a high hazard area as defined in the CRPS.</p> <p>Policy 11.3.1(6) provides for development within a “Greenfield Priority Area” located in a high hazard area, provided that the natural hazard effects are either avoided or appropriately mitigated.</p>

<p>2. is not likely to suffer significant damage or loss in the event of a natural hazard occurrence; and</p> <p>3. is not likely to require new or upgraded hazard mitigation works to mitigate or avoid the natural hazard; and</p> <p>4. is not likely to exacerbate the effects of the natural hazard; or</p> <p>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; or</p> <p>6. Within greater Christchurch, is proposed to be located in an area zoned in a district plan for urban residential, industrial or commercial use, or identified as a "Greenfield Priority Area" on Map A of Chapter 6, both at the date the Land Use Recovery Plan was notified in the Gazette, in which the effect of the natural hazard must be avoided or appropriately mitigated; or</p> <p>7. Within greater Christchurch, relates to the maintenance and/or upgrading of existing critical or significance infrastructure.</p>	
<p>Policy 11.3.2 Avoid development in areas subject to inundation</p>	<p>This policy relates to the rest of the site not identified as a “Greenfield Priority Area”.</p>

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<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">1. is of a type that is not likely to suffer material damage in an inundation event; or2. is ancillary or incidental to the main development; or3. meets all of the following criteria:<ol style="list-style-type: none">a. new buildings have an appropriate floor level above the 0.5% AEP design flood level; andb. hazardous substances will not be inundated during a 0.5% AEP flood event; provided that a higher standard of management of inundation hazard events may be adopted where local catchment conditions warrant (as determined by a cost/benefit assessment). <p>When determining areas subject to inundation, climate change projections including sea level rise are to be taken into account.</p>	<p>As mentioned previously, A site specific assessment would need to be required to determine whether the site is subject to inundation events.</p> <p>The applicant has indicated they have undertaken this assessment, but this would ideally be reviewed and verified.</p> <p>The applicant has proposed hazard mitigation as part of their proposal.</p>
Chapter 17 – Contaminated Land	

17.3.2 Development of, or discharge from contaminated land

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:

1. a site investigation is to be undertaken to determine the nature and extent of any contamination; and
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 contaminated land shall be avoided, remedied or mitigated in a manner that does not lead to further significant adverse effects.

The CRC has identified HAIL sites on the proposed land through the Listed Land Use Register.

The applicant has advised that a detailed site investigation (DSI) has been completed and that contamination has been remediated. Further investigation may be required to confirm that the remediation has not resulted in any ongoing or significant adverse effects.

Appendix 2: Consistency with Canterbury Land and Water Regional Plan (LWRP)

Objective/Policy	Assessment
Objective 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.	Appendix 8 to the application is a confirmation of consultation report, which include a report prepared by Mahaanui Kurataio Limited on behalf of Ngāi Tūāhuriri. This report notes some further consultation with paptipu rūnanga is needed. CRC considers that further engagement with papatipu rūnanga is necessary to ensure consistency with this objective.
Objective 3.5 Land uses continue to develop and change in response to socio-economic and community demand.	The assessment against the CRPS contains a more thorough assessment relating to consistency with broader land use provisions.
Objective 3.8 The quality and quantity of water in fresh water 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.	The CRC notes that generally the likely water takes and use, earthworks, construction methodology, operational site management, positioning from sensitive areas and associated discharges should be able to be managed effectively through good site management and conditions on the consent. However, without further detail on the proposed Erosion and Sediment Control (ESCP) or Site Management Plan (SMP), it is difficult to determine consistency with this objective.
Objective 3.18 Wetlands that contribute to cultural and community values, biodiversity, water quality, mahinga kai, water cleansing and flood mitigation are maintained.	Appendix 8 to the application is a confirmation of consultation report, which include a report prepared by Mahaanui Kurataio Limited on behalf of Ngāi Tūāhuriri. This report notes some further consultation with paptipu rūnanga is needed. CRC considers that further engagement with papatipu rūnanga is necessary to ensure consistency with this objective.

Objective 3.19 Natural character values of freshwater bodies, including braided rivers and their margins, wetlands, hāpua and coastal lagoons, are protected.	The CRC notes that generally the likely water takes and use, earthworks, construction methodology, operational site management, positioning from sensitive areas and associated discharges should be able to be managed effectively through good site management and conditions on the consent. However, without further detail on the proposed Erosion and Sediment Control (ESCP) or Site Management Plan (SMP), it is difficult to determine consistency with this objective.
Objective 3.23 Soils are healthy and productive, and human-induced erosion and contamination are minimised.	
Objective 3.24 All activities operate at good environmental practice or better to optimise efficient resource use and protect the region's fresh water resources from quality and quantity degradation	
<p>Policy 4.3</p> <p>Surface water bodies are managed so that:</p> <ul style="list-style-type: none"> a. toxin producing cyanobacteria do not render rivers or lakes unsuitable for recreation or human and animal drinking-water; b. fish are not rendered unsuitable for human consumption by contaminants; c. the natural colour of the water in a river is not altered; d. the natural frequency of hāpua, coastal lakes, lagoons and river openings is not altered; e. the passage for migratory fish species is maintained unless restrictions are required to protect populations of native fish; 	The CRC notes that generally the effects on surface water and groundwater can be managed effectively though conditions on the consent. However, without further detail in the form of a hydrogeology assessment, it is difficult to determine consistency with this objective.

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- f. reaches of rivers are not induced to run dry, thereby maintaining the natural continuity of river flow from source to sea,
- g. variability of flow, including floods and freshes, is maintained to avoid prolonged “flat-lining” of rivers; to facilitate fish passage; and to mobilise bed material; and
- h. the exercise of customary uses and values is supported.

Policy 4.4

Groundwater is managed so that:

- a. groundwater abstractions do not cause a continuing long-term decline in mean annual groundwater levels or artesian pressures;
- b. the individual and cumulative rate, duration and volume of water pumped from bores is controlled so as to prevent seawater contamination;
- c. the rate and duration of individual abstractions is controlled to ensure that individually or cumulatively, localised pressure reversal does not result in the downward movement of contaminants;
- d. in any location where an overall upwards pressure gradient exists, restrict the taking of groundwater so that at all times the overall upward pressure difference is maintained between any one aquifer and the next overlying aquifer;
- e. overall water quality in aquifers does not decline; and

f. the exercise of customary uses and values is supported.	
<p>Policy 4.13 For other discharges of contaminants into or onto land where it may enter water or to surface water bodies or groundwater (excluding those passive discharges to which Policy 4.26 applies), the effects of any discharge are minimised by the use of measures that:</p> <ul style="list-style-type: none"> a. first, avoid the production of the contaminant b. secondly, reuse, recovers or recycles the contaminant; c. thirdly, minimise the volume or amount of the discharge; or d. finally, wherever practical utilise land-based treatment, a wetland constructed to treat contaminants or a designed treatment system prior to discharge; and e. in the case of surface water, results in a discharge that after reasonable mixing meets the receiving water standards in Schedule 5 or does not result in any further degradation in water quality in any receiving surface waterbody that does not meet the water quality standards in Schedule 5 or any applicable water conservation order. 	<p>The applicant's Summary Assessment of Environmental Effects (AEE) report indicates that an ESCP will be prepared and implemented. The CRC notes this will generally help for the discharges to be managed effectively along with good site management and conditions on the consent. However, without further detail on the proposed ESCP, it is difficult to determine consistency with this policy.</p>
<p>Policy 4.14 Any discharge of a contaminant into or onto land where it may enter groundwater (excluding those passive discharges to which Policy 4.26 applies):</p> <ul style="list-style-type: none"> a. will not exceed the natural capacity of the soil to treat or remove the contaminant; and b. will not exceed available water storage capacity of the soil; and 	

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<p>c. where meeting (a) and (b) is not practicable, the discharge will:</p> <ul style="list-style-type: none">a. meet any nutrient limits in Schedule 8 or Sections 6 to 15 of this Plan; andb. utilise the best practicable option to ensure the size of any contaminant plume is as small as is reasonably practicable; andc. ensure there is sufficient distance between the point of discharge, any other discharge and drinking-water supplies to allow for the natural decay or attenuation of pathogenic micro-organisms in the contaminant plume; andd. not result in the accumulation of pathogens, or a persistent or toxic contaminant that would render the land unsuitable for agriculture, commercial, domestic, cultural or recreational use or water unsuitable as a source of potable water or for agriculture; ande. not raise groundwater levels so that land drainage is impeded.	
<p>Policy 4.14B</p> <p>Have regard to Ngāi Tahu values, and in particular those expressed within an iwi management plan, when considering applications for discharges which may adversely affect statutory acknowledgement areas, nohoanga sites, surface waterbodies, silent file areas, culturally significant sites, Heritage New Zealand</p>	<p>Appendix 8 to the application is a confirmation of consultation report, which include a report prepared by Mahaanui Kurataio Limited on behalf of Ngāi Tūāhuriri. This report notes some further consultation with paptipu rūnanga is needed. CRC considers that further engagement with papatipu rūnanga is necessary to ensure consistency with this objective.</p>

<p>sites, any listed archaeological sites, and cultural landscapes, identified in this Plan, any relevant district plan, or in any iwi management plan.</p>	
<p>Policy 4.17</p> <p>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.</p>	<p>The applicant's Summary AEE report indicates that an SMP will be adhered to during construction. The CRC notes that generally the likely earthworks, and associated discharges should be able to be managed effectively through good site management and conditions on the consent. However, without further detail on the proposed SMP, it is difficult to determine consistency with this policy.</p>
<p>Policy 4.18</p> <p>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.</p>	<p>The applicant's Summary AEE report indicates that an ESCP will be prepared and implemented. The CRC notes this will generally help for the discharges to be managed effectively along with good site management and conditions on the consent. However, without further detail on the proposed ESCP, it is difficult to determine consistency with this policy.</p>
<p>Policy 4.19</p>	

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

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.

Policy 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.	
<p>Policy 4.46</p> <p>The adverse effects of in-stream damming on water bodies other than those identified in Policy 4.44 will be avoided as a first priority, and where adverse effects are unable to be avoided, they will be remedied or mitigated.</p>	<p>The CRC notes that generally the damming of water bodies are able to be managed effectively through good site management and conditions on the consent. However, without further detail on the proposed methodology and design of the McIntosh Drain realignment, it is difficult to determine consistency with this policy.</p>
<p>Policy 4.57</p> <p>Any abstraction of groundwater does not result in cross-contamination between aquifers or water-bearing layers that results in, or may result in, adverse effects on water quality.</p>	<p>The CRC notes that generally the effects arising from the abstraction of groundwater can be managed effectively through conditions on the consent. However, without further detail related to the abstraction and proposed condition, it is difficult to determine consistency with this policy.</p>
<p>Policy 4.59</p> <p>The direct cumulative interference effect from new groundwater takes on existing groundwater takes shall not exceed the acceptable threshold criteria described in Schedule 12, unless it can be demonstrated that there will be no more than minimal adverse effects on the yield of existing adequately penetrating bores</p>	

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Policy 4.63

Any abstraction of groundwater is subject to conditions specifying:

- a. the maximum instantaneous rate of take;
- b. a maximum seasonal volume based on reasonable use determined in accordance with Schedule 10 over the period the water is required;
- c. the area or property within which the water is to be used;
- d. the location of the abstraction;
- e. any minimum groundwater levels at which abstraction ceases if specified in Sections 6 to 15;
- f. any other conditions to regulate the rate or volume of water that may be abstracted relative to the estimated volume of groundwater stored in a groundwater zone, if specified in Sections 6 to 15; and
- g. where the water is used for irrigation, the need for, compliance with, and auditing of a Farm Environment Plan.

Policy 4.65

<p>The rate, volume and seasonal duration for which water may be taken will be reasonable for the intended use.</p>	
<p>Policy 4.76</p> <p>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.</p>	<p>The CRC notes that generally the effects arising from the dewatering can be managed effectively through conditions on the consent. However, without further detail related to the abstraction and proposed condition, it is difficult to determine consistency with this policy.</p>
<p>Policy 4.76A</p> <p>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.</p>	
<p>Policy 4.81</p> <p>Any take, use, damming or diversion of water, any discharge of contaminants onto land or into water, or any earthworks, structures, planting, vegetation removal or other land uses within a wetland boundary, do not adversely affect the significant values of wetlands, hāpua, coastal lakes and lagoons, except for:</p> <ul style="list-style-type: none"> a. a temporary and or minor adverse effect where that activity is part of installing, maintaining, operating or upgrading infrastructure, pest management, or habitat restoration or enhancement work; or 	<p>The CRC notes that conditions on the consent are generally effective at mitigating effects and protecting values on wetlands. However, further detail on construction methodology, ESCP and SMP is needed to determine appropriate mitigation to ensure consistency with this policy.</p>

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the artificial opening of hāpua, coastal lakes or lagoons to assist in fish migration or achieving other conservation outcomes, customary uses, or to avoid land inundation.	
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Your written comments on a project under the Fast Track Approvals Act 2024

Project name	FTAA-2506-1072 Beach Grove Expansion Project
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Waimakariri District Council		
*First name	Kelly		
*Last name	LaValley		
Postal address	215, High Street ,Rangiora		
*Contact phone number	s 9(2)(a)	Alternative	s 9(2)(a)
*Email	s 9(2)(a)		

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

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

Managers signoff

Kelly LaValley

Kelly LaValley
General Manager Planning, Regulation and Environment
Management

Date : 10 Sept 2025

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

Fast Track Application FTAA-2506-1072 Beach Grove Expansion Project

Our Reference: RC255082, Trim number 250828158961

Date: 10 Sept 2025

To: Hon. Chris Bishop, Minister for Infrastructure
From: Waimakariri District Council
Fast-track project: FTAA-2506-1072 Beach Grove Expansion project

Thank you for your Invitation to provide written comments for the application for the Beach Grove Expansion project in Kaiapoi under the Fast Track Approvals Act 2024. Please see below Waimakariri District Council's (WDC) comments on this application.

1. Executive Summary

Waimakariri District Council has reviewed the Beach Grove Expansion project proposal in accordance with the Fast-track Approvals Act 2024. Following this review and ongoing consultation with Momentum Land Ltd, the Council finds the proposal to be broadly consistent with WDC's planning documents and likely to deliver housing outcomes in line with relevant planning documents.

Key considerations:

- **Zoning and Strategic Alignment:** The proposal aligns with the direction of the Partially Operative Waimakariri District Plan and the Waimakariri Development Strategy 2048.
- **Infrastructure:** WDC considers that the Beach Grove Expansion project has access to adequate water, wastewater, stormwater, and transport infrastructure to support a development of this scale.
- **Environmental and Cultural Considerations:** McIntosh's Drain, located within the site, is a significant stormwater channel and holds cultural importance for Te Ngāi Tūāhuriri Rūnanga.
- **Consultation:** WDC is satisfied with the level of pre-application consultation undertaken with the Council.
- **Fast-track Approvals Process:** WDC has identified no concerns that would prevent the application from being accepted under the Fast-track Approvals process.

2. Competing Applications

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

WDC response

- An application for a retirement village at 310 Beach Road, Kaiapoi (identified as the Southern block - Proposed Kaiapoi Retirement Village in the Fast Track application) was lodged with the Council on the 12 December 2022. On 27 July 2023, the applicant requested that the application be put on hold under s91D of the Act (RMA).
 - No request has been received to date to resume the application process, and it remains on hold.
 - WDC does not hold any other record of any competing applications (per the definition in the Fast Track Approval Act 2024 (FTAA)) in the same project area.
- b) *In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please provide written confirmation.*

WDC response

- There are no 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.

3. Specific Matters to Address

- 3.1 *Whether the project has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list and whether the project would have significant regional or national benefits.*

WDC Response

a) Canterbury Regional Policy Statement

- A portion of the Beach Grove Expansion project is situated within a designated “Greenfield Priority Area,” with the majority of the site identified as a “Future Development Area” in Map A of the Canterbury Regional Policy Statement. These classifications underscore the area's suitability and potential for residential development. These strategic planning provisions outlined in the Regional Policy Statement were carefully considered during the rezoning process for the Kaiapoi Development Area under the Proposed Waimakariri District Plan.

b) Greater Christchurch Spatial Plan

- The Greater Christchurch Spatial Plan identifies Kaiapoi as a locally significant urban centre within the wider region. The purpose of such centres is “to support greater intensification of people, services and employment to provide better co-location of people with amenities and

employment and provide better connections through public and active modes of transport.”¹

- The Beach Grove Expansion Project area has been identified as a future urban area under the Greater Christchurch Spatial Strategy. Visual representation of the strategy is provided on the map in Annexure 1.
- WDC considers the Beach Grove Expansion project a contribution to the objectives of the Spatial Plan.

c) Proposed Waimakariri District Plan (Currently Partially Operative)

- The Section 42A report relating to rezoning requests, acknowledged that the proposed development is consistent with the objectives of the National Policy Statement on Urban Development (NPS-UD) and the Canterbury Regional Policy Statement (RPS) for residential growth. As a result, the report supported the rezoning request submitted by Momentum Land Ltd and recommended that the land be rezoned to Medium Density Residential Zone (MRZ).
- The Section 42A report identified and assessed the following major aspects prior to recommending that the Momentum Land Ltd submission to rezone the land be accepted:
 - i. Flood hazard
 - ii. Geotechnical matters
 - iii. Servicing (stormwater management, wastewater management, water supply)
 - iv. Transport
 - v. Greenspace
 - vi. Airport noise
 - vii. Cultural sensitivity and mana whenua considerations
 - viii. Consistency with NPS-UD
 - ix. Consistency with Canterbury RPS
- The Hearing Panel’s recommendation to rezone the Kaiapoi Development Area to a Medium Density Residential Zone was formally adopted by the Waimakariri District Council (WDC).

3.2 Whether the Development 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)

WDC Response

- Waimakariri District Council’s long term projections identify that feasible development capacity for residential activity is required to meet the housing bottom lines as follows:

¹ Greater Christchurch Spatial Plan: <https://www.greaterchristchurch.org.nz/urbangrowthprogramme/greater-christchurch-spatial-plan/draft-greater-christchurch-spatial-plan>

Term	Short to Medium Term (2022-2032)	Long Term (2032-2052)	30 Year Time Frame (2022-2052)
Housing Bottom Lines (Development Capacity)	5,600 Residential Units	7,650 Residential Units	13,250 Residential Units

Table 1: Housing bottom lines Source: Partially Operative District Plan (PODP) (Decisions Version) objective UFD-O1

- The information in the PODP (Decisions Version) reflects the Waimakariri Development Strategy 2048 which identifies that Waimakariri District will likely experience a relatively high level of growth over the next 30 years and approximately 15,000 new houses could be required to meet population growth by 2048.²
- It also reflects the direction of the NPS-UD 2020 as a planning decision to improve housing affordability by supporting competitive land and development markets.
- The previous stages of the Beach Grove development have been a contributor to the District's housing supply. Eight stages have been consented which, when complete, will provide at least 588 residential units. The proposed development will further contribute to the District's housing supply.
- WDC considers the Beach Grove expansion project will play a role in addressing the district's housing needs by delivering a diverse range of housing types.
- Policy 1 of the National Policy Statement on Urban Development 2020 (NPS-UD) sets out the requirements for a well-functioning urban environment. As proposed, the Beach Grove expansion project will:
 - Provide a variety of homes,
 - Have good accessibility to jobs and community services,
 - Provide new reserve areas, some of which will connect to and extend existing reserves and walkways provided in earlier stages of the Beach Grove development,
 - Raise ground levels and have minimum floor levels to address flood risk and climate change.
- WDC considers that the Canterbury RPS gives effect to, and describes what a well-functioning urban environment is, in the Greater Christchurch context. The decision to rezone the site reflects the direction of the NPS-UD and the CRPS to provide well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
- The PODP includes an Outline Development Plan for the area, which is attached as Annexure 2.

² Waimakariri District Development Strategy July 2018. <https://www.waimakariri.govt.nz/council/documents-bylaws-plans/reports>

- Furthermore, the District's ageing population has been steadily increasing. According to 2024 Statistics NZ data, individuals aged 65 and over now comprise 22% of the District's total population which is significantly higher than the national average of 16.5%. Retirement villages have been identified as a necessary component of urban intensification within the District, as outlined in Policy UFD-P1 of the Partially Operative District Plan (Decision Version). Accordingly, the proposed retirement village aligns with projected demographic trends and supports strategic planning for the District's ageing population.

3.3 *Any high-level commentary regarding the project's alignment with the Council's relevant plans, policies, and/or strategies (including any proposed plans).*

WDC Response

a) District Development Strategy 2048

- WDC's District Development Strategy provides a framework to guide anticipated residential and business growth in the District through to 2048. The strategy is a key reference point to inform decision making within the context of a long-term view. It sets out directions for growth and development in the District.
- The Strategy states that "given the demographic changes, it is necessary to plan for housing choices that suit smaller households and encourage an increase in intensification close to the main town centres or within appropriate greenfield developments." The strategy also seeks to enable opportunities that contribute to meeting the need for affordable housing.
- WDC considers the Beach Grove Expansion project to be consistent with the objectives and direction of the District Development Strategy 2048.

b) Partially Operative Waimakariri District Plan (Decisions Version) Objectives and Policies

• **SD - Rautaki ahunga - Strategic Directions**

- WDC considers the Kaiapoi expansion project is consistent with the strategic direction sought by the PODP (Decisions Version) by supporting a well-functioning urban environment while recognising the existing residential and natural environment to provide a range of housing opportunities with reticulated service arrangements.
- The proposed commercial area, neighbourhood parks and well-functioning roading layout also supports the residential activities to be conducted effectively and for a well-functioning urban environment.
- WDC encourages Momentum Land Ltd to continue consultation with Te Ngāi Tūāhuriri Rūnanga to continue their involvement in the project.

• **UFD - Āhuatanga auaha ā tāone - Urban Form and Development**

WDC considers the Beach Grove expansion project is consistent with the Urban Form and Development anticipated in the Partially Operative District Plan by providing:

- Development capacity for residential activity is provided at all times to meet specified housing bottom lines and a changing demographic profile of the District.

- Intensification in Kaiapoi area through provision of a retirement village, and a Residential Zones which is consistent with the anticipated built form and purpose of the zone;
 - Well-connected Medium Density Residential environment
 - The expansion will be developed in accordance with the Outline Development Plan which is consistent with NPS-UD and as a continuation of the existing residential development in Kaiapoi.
- **SUB - Wāwāhia whenua – Subdivision**
WDC considers the proposed design achieves the integrated pattern of development and land use anticipated for the Medium Density Residential Zone and is a continuation of the existing residential development in the area.
 - Appropriate measures will need to be considered for flood risk.
 - Appropriate and feasible roading and transport layout will need to be considered for the project.
 - Discussions are currently being undertaken with the applicant to achieve a sustainable design for the subdivision.
 - The proposed subdivision is generally in accordance with the Outline Development Plan.
 - Realignment of the McIntosh's Drain, and provision of reserve areas is expected to ensure enhancement of the area while protecting it's ecological and cultural values.
 - **SASM - Ngā whenua tapu o ngā iwi - Sites and Areas of Significance to Māori**
 - WDC acknowledges the consultation undertaken by Momentum Land Ltd with both Te Nga Tuahuriri Runanga and Heritage NZ Pouhere Taonga. The cultural and heritage value of McIntosh's Drain area is expected to be protected by avoiding inappropriate modification, use and development.
 - **NOISE - Te orooro – Noise**
 - About one third of the northern block and all of the southern block are subject to the 50dBA airport noise contour. The Partially Operative District Plan (Decisions Version) anticipates protecting the Christchurch International Airport from reverse sensitivity effects and reflects Policy 6.3.5(4) in the Canterbury Regional Policy Statement (CRPS), by including the following policy:
Noise P-4
Airport Noise Contour
Protect Christchurch International Airport from reverse sensitivity effects by:
 1. *avoiding noise sensitive activities within the 50 dB Ldn Noise Contour by limiting the density of any residential unit or minor residential unit to a maximum of 1 residential unit or minor residential unit per 4ha, except within existing Kaiapoi Residential Zones, greenfield priority areas identified in Chapter 6 - Map A of the RPS (gazetted 6 December 2013) or any residential Development Area; and*
 2. *requiring noise insulation within the 50 dB Ldn and 55 dB Ldn Noise Contours for Christchurch International Airport.*

- The s42A report to the hearing panel stated that *“the enabling policies in the NPS-UD 2020 and the provisions in 6.3.5(4) of CRPS that prohibit development underneath the 50dBA contour can be reconsidered in their weighting with an NPS-UD interpretation and there is no spatial prohibition on the siting of new development under the 50dBA contour, instead, the requirement shifts to avoiding the noise effects in buildings within the development.”* The s42A report recommended that the entire Kaiapoi Development Area be rezoned Medium Density Residential Zone (MRZ). The independent hearing panel accepted the recommendation and WDC adopted the Panel’s recommendation.
- An appeal was recently lodged by Christchurch International Airport Ltd (CIAL) relating to noise sensitive activities below the 50dBA noise contour. The appeal is unresolved at the time of providing these comments.

- **NH - Matepā māhorahora - Natural Hazards**

- As part of the Proposed District Plan hearing process, the experts agreed that the area currently has a high degree of flood risk. However, they also agreed that the risk can be mitigated through raising the land, as occurred with the earlier stages of the Beach Grove development.
- Therefore, WDC considers that mitigation measures can be appropriately utilised to mitigate the effects of flood hazard on people, property, infrastructure and the environment noting that the majority of the existing Beach grove development (Stages 1-8) was also within a high flood hazard zone, but appropriate mitigation was undertaken to mitigate the risk.

- **MRZ- Medium Density Residential Zone**

- The proposed expansion is consistent with the Partially Operative District Plan’s direction for the Medium Density Residential Zone to provide a higher density of residential development than other residential zones with a variety of housing types and sizes to meet housing needs and demand while protecting residential amenity and character. The application also proposes a small-scale commercial centre that will service the local community.

4. Other considerations

- a) Ongoing consultation
 - Momentum Land Development has been holding monthly consultation meetings with Council staff regarding the North Block project since February 2025. Detailed discussions are underway on the following key matters:
 - a) Traffic, transport and roading
 - b) Servicing
 - c) Macintosh’s Drain reserve realignment and development
 - d) Neighbourhood parks and reserves requirements
 - e) Minimum Floor level requirements/Flood risk mitigation
 - f) Outline Development Plan

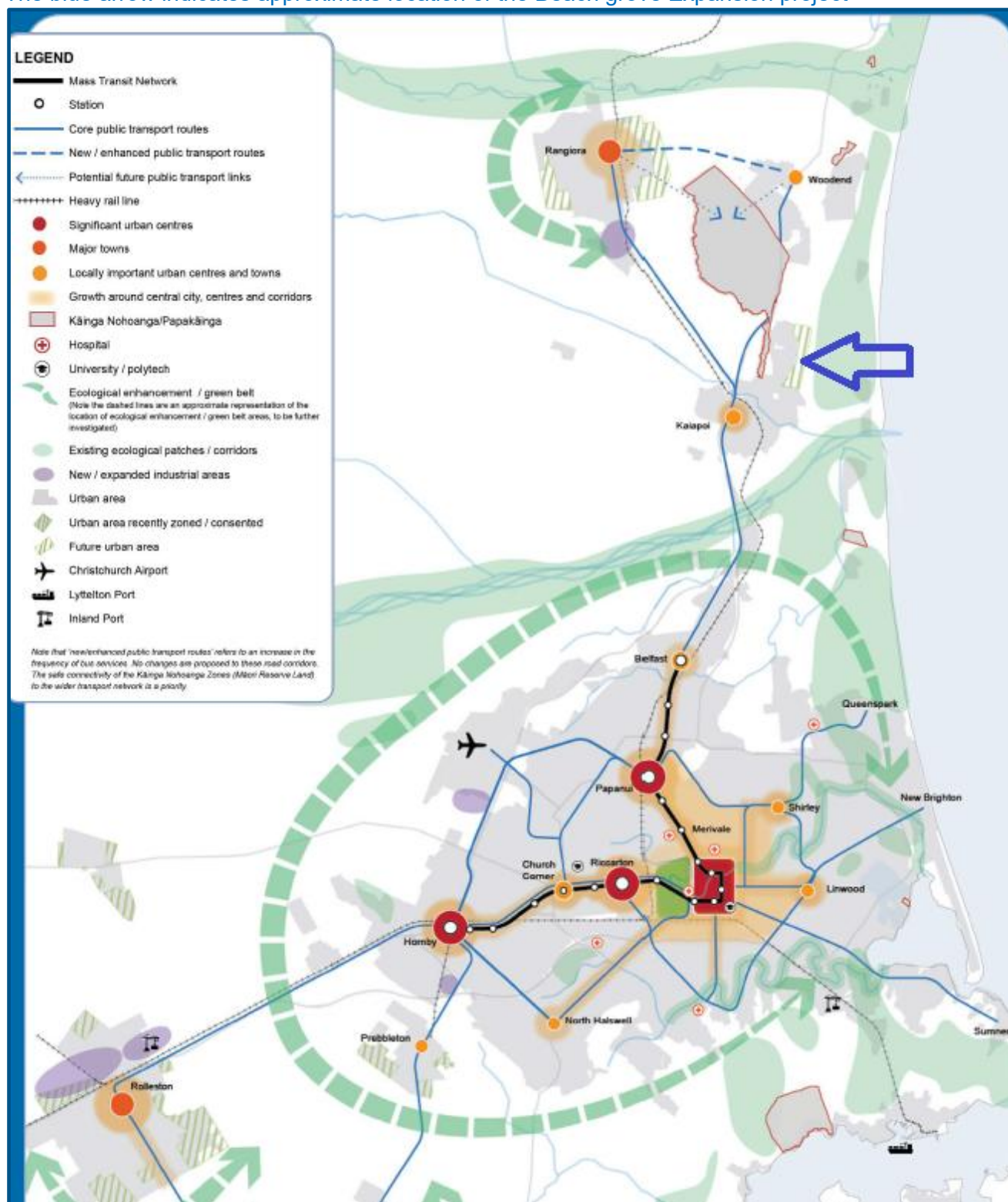
- It is noted that the consultation undertaken with WDC as part of the Fast-track referral application related to the North Block development. A resource consent application for a retirement village on the South Block is currently on hold. It is recommended that further consultation is undertaken encompassing both blocks to ensure any cumulative effects are appropriately identified and considered.
- b) Appeals on the Proposed District Plan (now known as the Partially Operative District Plan)
- An appeal was recently lodged by Christchurch International Airport Ltd (CIAL) relating to noise sensitive activities below the 50dBA noise contour, including the Kaiapoi Development area. The appeal is unresolved at the time of providing these comments.

5. Conclusion

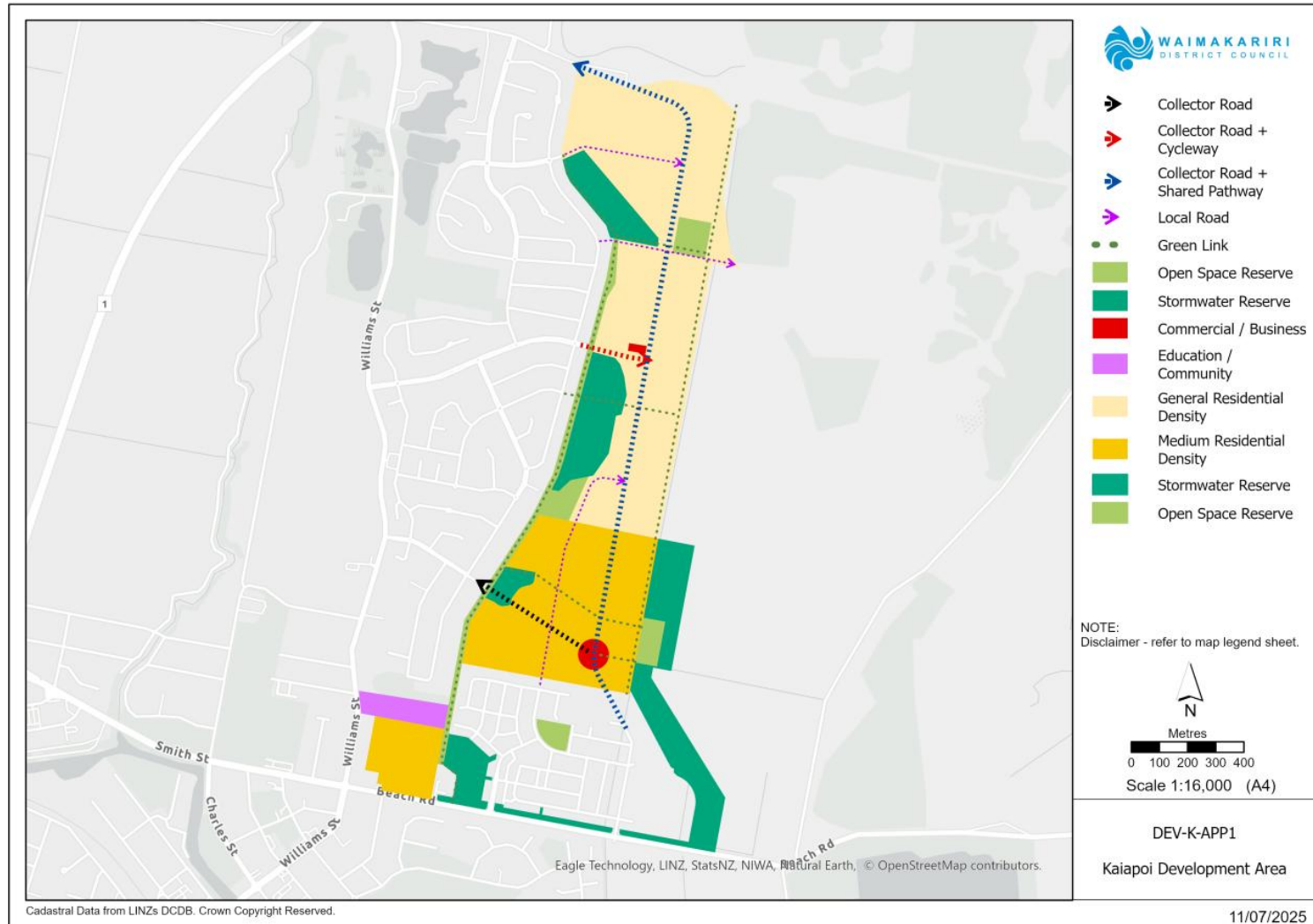
Overall, the proposed development is supported by provisions in the Greater Christchurch Spatial Plan, Regional Policy Statement and the Partially Operative District Plan 2025. Consequently, WDC has no objection to the proposal being considered under the Fast-track Approvals Act.

Annexure 1: Greater Christchurch Spatial Strategy (1 million People)

The blue arrow indicates approximate location of the Beach grove Expansion project



Annixture 2: Kaiapoi Development Area – Outline Development Plan



Hon Tama Potaka

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



9 September 2025

CORTP-5246

Hon. Shane Jones
Minister for Regional Development
s.jones@ministers.govt.nz
Parliament Buildings
Private Bag 18041
WELLINGTON 6160

Tēnā koe Hon. Jones

Thank you for your invitation to comment on the fast-track consent application for Beachgrove Kaiapoi Expansion project. This project includes approximately 650 to 900 residential units, a 300-unit retirement village, supporting infrastructure, an ecological reserve, and a neighbourhood centre.

This project would increase the supply of homes and provide additional capacity to relieve demand for both residential housing and retirement housing in the Greater Christchurch area.

The development would be in line with objectives sought under the Greater Christchurch Spatial Plan (GCSP). The residential development part of the project appears to be located on land that was identified as 'future urban' in the Spatial Plan.

Kaiapoi was also identified as a 'locally important urban centre/town' in the GCSP, and it is intended to support greater intensification of people, services and employment. The retirement village part of the project is not located on 'future urban' land, but it is surrounded by an existing urban area which may explain this. Both areas are zoned as medium density residential through Waimakariri's district plan which was finalised in June 2025. It would be encouraging to see a housing development that takes advantage of the medium density residential zone.

Kaiapoi is an area with significant environmental constraints, including flooding risks. That should be carefully considered when the application is assessed. I expect that the expert panel will take account of this at the detailed consenting stage.

I have no objection, from the perspective of the Housing Portfolio, about this project being referred to the next stage. Thank you again for the opportunity to comment.

Mauriora

A handwritten signature in blue ink, reading 'Tama Potaka'.

Hon Tama Potaka
Associate Minister of Housing

From: [Infrastructure Portfolio](#)
To: [FTAreferrals](#)
Subject: FW: Invitation to comment on Fast-track referral application for the Beachgrove Kaiapoi Expansion Project under the Fast-track Approvals Act 2024 – FTAA-2506-1072
Date: Monday, 15 September 2025 8:20:59 am

From: Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Sent: Friday, 12 September 2025 3:30 PM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: RE: Invitation to comment on Fast-track referral application for the Beachgrove Kaiapoi Expansion Project under the Fast-track Approvals Act 2024 – FTAA-2506-1072

Kia ora,

Confirming Minister Goldsmith has no comments.

Kind Regards,



Office of Hon Paul Goldsmith
Minister for Arts Culture and Heritage | Minister of Justice
Minister for Treaty of Waitangi Negotiations | Minister for Media and Communications

Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Thursday, 14 August 2025 10:08 AM
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; Casey Costello (MIN) <C.Costello@ministers.govt.nz>
Cc: FTAreferrals <ftareferrals@mfe.govt.nz>
Subject: Invitation to comment on Fast-track referral application for the Beachgrove Kaiapoi Expansion Project under the Fast-track Approvals Act 2024 – FTAA-2506-1072

To:
Minister for Economic Growth
Minister for Arts, Culture and Heritage
Minister of Conservation
Associate Minister of Housing
Minister for the Environment
Minister for Seniors

PLEASE NOTE

Minister Bishop, as Minister for Infrastructure, has declared a conflict of interest with this application, and has therefore transferred decision-making to Minister Jones for this referral application. The Office of Minister Bishop will continue to process the application on behalf of Minister Jones' Office, however, the final decision on this application will rest with Minister Jones.

Dear Ministers,

Hon Shane Jones, the Acting Minister for Infrastructure (the Minister) for this project, has asked for me to write to you on his behalf.

The Minister has received an application from Momentum Land Limited for referral of the Beachgrove Kaiapoi Expansion Project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2506-1072).

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. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

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

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

Process

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

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

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

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Acting Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Office of Minister Bishop (as the administering office for this application) 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 the Office of Minister Bishop (as the administering office for this application) and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	Beachgrove Kaiapoi Expansion Project
Applicant	Momentum Land Limited
Location	Kaiapoi, Christchurch
Project description	The project comprises two main components being:

	<ol style="list-style-type: none"> 1. A housing development on a 37-hectare site (North Block), including: <ol style="list-style-type: none"> a. approximately 650–900 residential units (with lot sizes ranging from 200–450m²). Details would be refined and finalised for submission of a substantive application, if referred b. a neighbourhood commercial centre at the intersection of primary connector roads c. 6–9 hectares of ecological restoration reserve, including wetlands, native planting, and public walkways d. new roading, pedestrian and open space networks integrated with surrounding areas e. stormwater management via a reticulated pipe network and stormwater basins f. wastewater servicing through the existing low-pressure network and a planned upgrade to a Council pumpstation g. water supply supported by existing capacity in the Kaiapoi scheme and future Council upgrades 2. A 300-unit retirement village on a 6-hectare site (South Block), including: <ol style="list-style-type: none"> a. up to 180 villas (1–2 storey duplexes and standalone units) b. up to 115 apartments and 10 care suites in centrally located buildings c. a care home with up to 60 care beds and 20 dementia beds d. a centrally located lodge building with communal amenities (including dining, lounge, indoor pool, gym, and library) e. ground-level parking and landscaping f. stormwater management via a reticulated pipe network and proprietary treatment device g. wastewater and water servicing integrated with existing and planned Council infrastructure.
--	--

Kind regards,



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 Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment



09 SEP 2025

Hon Shane Jones
Minister for Regional Development
Parliament Buildings
Wellington

REQ-0020242

Dear Shane

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

I am providing comments in my capacity as Minister for Economic Growth, focusing on whether this application is 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.

Beachgrove Kaiapoi Expansion Project, FTAA-2506-1072

This proposal is an extension of the Beachgrove residential development at Kaiapoi, Christchurch. The project would address potential shortage in housing stock and includes two main developments: a 37-hectare housing development providing 650 to 900 housing units of various typologies, and a 6-hectare retirement village that includes villas and comprehensive care units.

Limited economic information was provided, however, the applicant mentioned that an economic assessment of the project estimates that the construction and development phase could add \$40million to GDP and generate employment for 275 people annually over a seven-year period. While these short-to-medium term benefits would be limited to the region, the primary economic benefit of this proposal is its provision of additional housing and dedicated retirement facilities critical to a growing and ageing population. This is important for a growing economy.

Given this application would provide a significant boost in the housing supply, this project could be better assessed under increasing the supply of housing, address housing needs, or contribute to a well-functioning urban environment (s22(2)(a)(iii) of the FTAA).

Yours sincerely

Hon Nicola Willis
Minister for Economic Growth

From: [Infrastructure Portfolio](#)
To: [FTAreferalls](#)
Subject: FW: FTAA-2506-1072 Invitation to comment on Fast-track referral application for the Beachgrove Kaiapoi Expansion Project under the Fast-track Approvals Act 2024
Date: Monday, 1 September 2025 1:45:57 pm
Attachments: [image002.png](#)

Please see comment below.

Rob

From: Environment Portfolio <Environment.Portfolio@parliament.govt.nz>
Sent: Monday, 1 September 2025 11:36 AM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: RE: FTAA-2506-1072 Invitation to comment on Fast-track referral application for the Beachgrove Kaiapoi Expansion Project under the Fast-track Approvals Act 2024

Good day,

Thank you for the below invitation to comment.

Please be advised that Hon Penny Simmonds, Minister for the Environment has reviewed this application and does not wish to provide comment.

Kind regards,



Office of Hon Penny Simmonds

Environment Portfolio

Minister for the Environment | Minister for Vocational Education
Associate Minister for Social Development | MP for Invercargill

Website: www.beehive.govt.nz

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

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Thursday, 14 August 2025 10:08 AM
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; Casey Costello (MIN) <C.Costello@ministers.govt.nz>
Cc: FTAreferalls <ftareferalls@mfe.govt.nz>
Subject: Invitation to comment on Fast-track referral application for the Beachgrove Kaiapoi Expansion Project under the Fast-track Approvals Act 2024 – FTAA-2506-1072

To:

Minister for Economic Growth

Minister for Arts, Culture and Heritage

Minister of Conservation

Associate Minister of Housing

Minister for the Environment

Minister for Seniors

PLEASE NOTE

Minister Bishop, as Minister for Infrastructure, has declared a conflict of interest with this application, and has therefore transferred decision-making to Minister Jones for this referral application. The Office of Minister Bishop will continue to process the application on behalf of Minister Jones' Office, however, the final decision on this application will rest with Minister Jones.

Dear Ministers,

Hon Shane Jones, the Acting Minister for Infrastructure (the Minister) for this project, has asked for me to write to you on his behalf.

The Minister has received an application from Momentum Land Limited for referral of the Beachgrove Kaiapoi Expansion Project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference

FTAA-2506-1072).

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. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

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

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

Process

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

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

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Important Information

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

Project summary

Project name	Beachgrove Kaiapoi Expansion Project
Applicant	Momentum Land Limited
Location	Kaipoi, Christchurch
Project description	The project comprises two main components being: 1. A housing development on a 37-hectare site (North Block), including:

	<ul style="list-style-type: none">a. approximately 650–900 residential units (with lot sizes ranging from 200–450m²). Details would be refined and finalised for submission of a substantive application, if referredb. a neighbourhood commercial centre at the intersection of primary connector roadsc. 6–9 hectares of ecological restoration reserve, including wetlands, native planting, and public walkwaysd. new roading, pedestrian and open space networks integrated with surrounding arease. stormwater management via a reticulated pipe network and stormwater basinsf. wastewater servicing through the existing low-pressure network and a planned upgrade to a Council pumpstationg. water supply supported by existing capacity in the Kaiapoi scheme and future Council upgrades <p>2. A 300-unit retirement village on a 6-hectare site (South Block), including:</p> <ul style="list-style-type: none">a. up to 180 villas (1–2 storey duplexes and standalone units)b. up to 115 apartments and 10 care suites in centrally located buildingsc. a care home with up to 60 care beds and 20 dementia bedsd. a centrally located lodge building with communal amenities (including dining, lounge, indoor pool, gym, and library)e. ground-level parking and landscapingf. stormwater management via a reticulated pipe network and proprietary treatment deviceg. wastewater and water servicing integrated with existing and planned Council infrastructure.
--	--

Kind regards,



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 Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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

Project name	Beachgrove Kaiapoi Expansion Project
---------------------	--------------------------------------

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

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
*Portfolio	Seniors		
*First name	Hon Casey		
*Last name	Costello		
Contact person (if different from above)			
*Contact phone number	<small>s 9(2)(a)</small> [redacted]	Alternative	
*Email	c.costello@ministers.govt.nz		

2. Please provide your comments on this application
My comments are attached below.

Minister’s signoff


Hon Casey Costello
Minister for Seniors

Date 8/7/25



Hon Shane Jones,
Acting Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act referral application: Beachgrove Kaiapoi Expansion Project, FTAA-2506-1072

Dear Shane,

Thank you for the opportunity to comment as Minister for Seniors on this application for referral under the Fast-track Approvals Act 2024 (the Act). I have considered whether this application is likely to '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)', under s22(2)(a)(iii) of the Act, based on the information provided in the application. I will leave it to you and other relevant Ministers to assess the other criteria.

The following aspects of the project are likely to meet this criterion:

- The construction of a housing development comprising between 650 and 900 housing units.
- The construction of a 300-unit retirement village comprising up to 180 villas, 115 apartments, 10 care suites, and an 80-bed care home.

Based on this information, the project is suitable for referral to the fast-track process. If the application is referred, I would welcome the opportunity to comment on the project in more detail.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'C' followed by a horizontal line.

Hon Casey Costello

Minister for Seniors

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

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

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Department of Conservation		
*First name	Terry		
*Last name	Calmeyer		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz ; s 9(2)(a)		

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

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

Manager's signoff



Jenni Fitzgerald

11 September 2025

Director-General of Conservation s17 comments

Project name	Beachgrove Kaiapoi Expansion Project
Applicant name	Momentum Land Limited
Application number	FTAA-2506-1072
Project summary details	<p>The project involves the expansion of the Beachgrove residential development in Kaiapoi within the Waimakariri District. It will deliver approximately 650-900 new residential units alongside a 300-unit retirement village, resulting in a combined total of around 950 to 1,200 homes. The project area is located less than one kilometre from central Kaiapoi and approximately 17 kilometres north of Christchurch. The project comprises two main components being:</p> <ol style="list-style-type: none"> 1. A housing development on a 37-hectare site (North Block) located at 143, 147, 151 Ferry Road, Kaiapoi, including: <ol style="list-style-type: none"> a. approximately 650–900 residential units (with lot sizes ranging from 200–450m²). b. a neighbourhood commercial centre at the intersection of primary connector roads c. 6–9 hectares of ecological restoration reserve, including wetlands, native planting, and public walkways d. new roading, pedestrian and open space networks integrated with surrounding areas e. stormwater management via a reticulated pipe network and stormwater basins f. wastewater servicing through the existing low-pressure network and a planned upgrade to a Council pumpstation g. water supply supported by existing capacity in the Kaiapoi scheme and future Council upgrades 2. A retirement village on a 6-hectare site (South Block) located at 310 Beach Road, Kaiapoi, including: <ol style="list-style-type: none"> a. up to 180 villas (1–2 storey duplexes and standalone units) b. up to 115 apartments and 10 care suites in centrally located buildings c. a care home with up to 60 care beds and 20 dementia beds d. a centrally located lodge building with communal amenities (including dining, lounge, indoor pool, gym, and library) e. ground-level parking and landscaping f. stormwater management via a reticulated pipe network and proprietary treatment device g. wastewater and water servicing integrated with existing and planned Council infrastructure.

	<p>The application for referral indicates that if lizard habitat is confirmed by the Project ecologist, then the following approvals will be sought:</p> <ul style="list-style-type: none"> • Wildlife Act Authority to undertake activities that may result in significant impact on a species or habitat, and/or • Handling Permit for handling and/or moving lizards. <p>The Site is not on or near Public Conservation Land.</p>
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1 General comment

- 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 of the FTAA.
- 1.2 In relation to this application, the applicant took steps to consult with DOC prior to lodging their application for referral. Consultation was initiated on the 29th of January 2025 and DOC provided information to the applicant on the 13th of February 2025. In summary, DOC recommended engagement when further information is known about the presence or absence of wildlife and how that would be managed. The referral application was lodged on the 3rd of March 2025. The application was returned to the applicant on the 19th of March 2025 for not complying with the requirements in s14(2) of the FTAA. The applicant amended the application and re-lodged on the 19th of June 2025. The applicant did not consult with DOC after the 13th of February 2025.
- 1.3 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, it considers it likely that with the appropriate design and conditions, effects can be managed to appropriate levels.
- 1.4 DOC is not aware of any other reason the project should not be referred.

2 Minister's decision on referral application

- 2.1 FTAA sections 21 and 22 set out matters to be considered in determining whether a referral application should be accepted.
- 2.2 DOC notes that other agencies are better placed to comment on most matters, including those in section 22. Comments below are therefore targeted to sections where DOC has specific interests or information relevant to the Minister's decision.
- 2.3 For completeness, DOC has considered the criteria for assessing referral applications in section 22 and has not identified anything it considers the Minister should take into account.
- 2.4 Section 21(3) and (4) set out when the Minister may/must decline a referral application. DOC has considered these criteria and comments as follows:

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	The meaning of ineligible activity is set out in s5 of the FTAA – DOC has considered s5(1)(f), (h), (i), (j) and (k) and has not identified any aspect of the project that would meet the definition.
21(3)(c)	Is there adequate information to inform a decision	No detailed ecological information has been provided. If the referral to the fast-track process is granted and the applicant proceeds with the substantive application process, then detailed ecological surveys (including lizard surveys) would need to be undertaken. These surveys would confirm which species, if any, are found on the site. A Wildlife Act Approval should then be applied for to protect wildlife present at the site that are likely to be impacted by the project. Regardless of this, DOC considers the information 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"> • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011. 	The Ngai Tahu Claims Settlement Act 1998 applies to this area. DOC is not aware of any inconsistency with the relevant Treaty settlement, subject to any comments from the Treaty partner under s17(1)(d).
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 the conservation approval identified should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	No comprehensive surveys or investigations of ecological features, including watercourses and natural inland wetlands and habitat of fauna have been provided by the applicant. As such DOC considers there is the potential for the project to have significant adverse effects given values known/anticipated to be present. Overall, however, based on the high-level information available, DOC considers adverse effects of the project may be able to be addressed through the design phase and with the imposition of appropriate conditions.

Section	Criteria	Comments
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.

2.5 Section 22 sets out the criteria for the Minister for accepting a referral application. DOC has considered these criteria and comments as follows:

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?	DOC notes that a Wildlife Act approval of this nature would typically take three-four months to process. However, there may be benefits for the applicant in terms of consideration being combined with RMA approvals, and given the different decision-making framework under the FTAA.
22(2)(a)(ix)	Will this project address significant environmental issues?	This project is not related to addressing existing significant environmental issues.
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	The proposed site is located in the area subject to the Canterbury (Waitaha) Conservation Management Strategy (CMS) 2016, which provides guidance for DOC's work in the form of a vision, objectives, outcomes for places, policies and milestone. No inconsistencies with the Strategy have been identified.
22(b)	Any other matters the Minister may consider as relevant?	None identified.

3 Other considerations

3.1 DOC notes that once a referral decision is made, the scope of any subsequent substantive application is confined by that of the referral application. 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 an application. In some of these cases it has been necessary for applicants to seek additional approvals under the specified Acts via normal processing. This can result in inefficiencies, additional costs and undermining of the benefits of the 'one stop shop' approach the FTAA was designed to deliver.

- 3.2 Given the lack of assessment undertaken at the referral stage, DOC considers it may be beneficial for the applicant to consider whether it should seek to include additional approvals that would potentially be required on a precautionary basis. To this end, DOC suggests the Minister consider whether further information should be sought from the applicant under s20 prior to making their decision to ensure all approvals in scope of the FTAA and necessary to implement the project are included.
- 3.3 The Applicant is proposing to undertake works in McIntosh Drain, and to potentially temporarily or permanently install culverts in the drain. The Applicant has also indicated that resource consents (National Environmental Standards for Freshwater) maybe required for activities associated with the diversion and reclamation of onsite farm drains as part of works to establish the retirement village. DOC therefore recommends that the Minister request further information from the applicant, clarifying whether any activities proposed in natural rivers, streams, or water meet the criteria for complex freshwater fisheries activities and, if so, whether the applicant is also seeking these approvals or intends to instead obtain approval separately outside of this process.
- 3.4 DOC notes that the New Zealand Coastal Policy Statement (NZCPS) may also be of relevance due to the project site's proximity to the coast and given that coastal waters may be the ultimate receiving environment for discharges to surface water. As the applicant has not addressed the NZCPS in their high-level planning analysis, and given the limited assessment undertaken at the referral stage, DOC recommends the Minister requests further information from the applicant addressing whether the NZCPS may be of relevance and, if so, whether the proposal is consistent with any relevant provisions.

4 Matters for the Minister to specify (s27)

- 4.1 DOC notes that there is no obligation on an applicant to undertake pre-lodgement consultation with administering agencies in respect of a substantive application for a referred project. Given the lack of 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.
- 4.2 To this end, DOC suggests the Minister considers specifying that evidence of further engagement with DOC be submitted with the substantive application, should the decision be to accept the referral application.



Jenni Fitzgerald
Fast-Track Applications Manager

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

Date: 11 September 2025

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



Heritage New Zealand Pouhere Taonga comments on Beachgrove Kaiapoi Expansion Project referral application

Application name	Beachgrove Kaiapoi Expansion Project – Referral Application
EPA reference	Fast-track Approvals Act 2024-2506-1072
Applicant/s	Momentum Land Limited
Comments due by	10 September 2025

Organisation name	Heritage New Zealand Pouhere Taonga		
*First name	Angelica		
*Last name	Pablo		
Postal address	PO Box 2629 Wellington 6140		
*Home phone/Mobile phone		*Work Phone	s 9(2)(a)
*Email	fasttrack@heritage.org.nz		
Submission prepared by	Mitzie Bisnar		
Contact details	s 9(2)(a)		

General comment on application and recommendations

Thank you for the opportunity to comment on the referral application for the Beachgrove Kaiapoi Expansion Project. Heritage New Zealand Pouhere Taonga (HNZPT) has assessed the application, with input from specialist regional heritage staff, including those with Māori heritage, planning and archaeological expertise.

Based on the information provided, if the project is referred by the Minister, we recommend the following:

- Cultural Values Statement
- HNZPT, Mahaanui Kurataiao Limited and Te Ngāi Tūāhuriri Rūnanga should be invited to comment on the substantive application.
- Should the decision be made to work under an Accidental Discovery Protocol, consultation and collaboration with HNZPT is recommended to create an appropriate protocol.

HNZPT can confirm the applicants, Momentum Land Limited, have consulted with us in the pre-application stage. As noted at our pre-application consultation meeting, “*depending on the appetite for*



risk, Momentum Land Limited may still wish to request further assessment of the potential to impact Māori archaeology, to ensure that an ADP is the option that best suits the project”¹.

Cultural heritage values

There are no historic places within the project area that are listed on the New Zealand Heritage List/Rārangi Kōrero.

The project area is within the takiwā of Te Ngāi Tūāhuriri Rūnanga. HNZPT advised the applicants during the pre-application consultation meeting on 13 February 2025, to re-engage and update consultation with Ngāi Tahu from 2022. The applicants also noted at the time that consultation with Mahaanui Kurataiao Limited was already being undertaken.

Evidence of this consultation has now been provided in Appendix 8 to their referral application under the Fast-track Approvals Act 2024. HNZPT supports mana whenua advice and recommendations in respect of cultural heritage. As such, HNZPT supports the applicant’s commitment to continuing consultation with Mahaanui Kurataiao Limited and Te Ngāi Tūāhuriri Rūnanga, insofar as they relate to Māori heritage which includes Māori archaeology.

HNZPT also notes in Appendix 9 that the applicants are preparing a Cultural Values Statement². Given the cultural significance of the project area to Te Ngāi Tūāhuriri Rūnanga, HNZPT recommends that a Cultural values Statement is indeed prepared and included, should the project proceed to a substantive application under the Fast Track Approvals Act 2024.

Archaeology

An archaeological assessment covering the project area for the Beachgrove Kaiapoi Expansion Project, including the retirement village, was undertaken in 2022 by Underground Overground Archaeology. This assessment of the project area indicated that no archaeological sites outside of the McIntosh Drain were identified during the earthworks for the previous phases of the Beachgrove project.

The applicant has been granted an archaeological authority for the works relating to McIntosh Drain under the Heritage New Zealand Pouhere Taonga Act 2014 (2023/284). As noted above, the authority is limited to McIntosh Drain and its offshoots, and does not cover any sites outside of this.

HNZPT acknowledges that the applicants wish to proceed with an Accidental Discovery Protocol for the remainder of the project and project area. Should the decision be made to work under an Accidental Discovery Protocol, consultation and collaboration with HNZPT is recommended to create an appropriate protocol for the project.

The applicant has not applied for an authority for the remainder of the project area for the Beachgrove Kaiapoi Expansion Project.

Recommendations

If the project is referred, the following information should be provided by the applicant in their substantive application:

- HNZPT notes that the applicants are preparing a Cultural Values Statement, as stated in paragraph 12 of Appendix 9³. HNZPT recommends that a Cultural Values Statement, mandated

¹ Appendix 8 – Confirmation of consultation, HNZPT Meeting File Note, dated 13 February

² Appendix 9 – High level planning analysis Part A and Part B Doc

³ Appendix 9 – High level planning analysis Part A and Part B Doc



by mana whenua, is prepared and submitted with their substantive application, to elaborate on the impact on Māori Heritage.

- Should the choice be made to work under an Accidental Discovery Protocol, it is recommended that consultation and collaboration with HNZPT be undertaken to create an appropriate protocol for the project.

If the project is referred, the panel should invite the following persons to comment on the application:

- HNZPT
- Mahaanui Kurataiao Limited
- Te Ngāi Tūāhuriri Rūnanga

The applicant has consulted with HNZPT regional staff and organised a pre-application consultation meeting on 13 February 2025. The meeting was held in the Heritage New Zealand Pouhere Taonga Christchurch Office and attended by Southern Regional Archaeologists, Gwen Hoopmann and Jasmine Weston, Māori Heritage Advisor, Huia Pacey, Area Manager, Arlene Baird and Planner, Mitzie Bisnar. We recommend that if the project is referred, that the applicant continue to consult with HNZPT regional staff, Mahaanui Kurataiao Limited and Te Ngāi Tūāhuriri Rūnanga.

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

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

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Christchurch International Airport Limited		
*First name	Jesse		
*Last name	Aimer		
Postal address	Level 4, Carpark, 30 Durey Road, Christchurch Airport		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Please refer to appended letter.

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



Jesse Aimer

10.09.2025

PO Box 14001
Christchurch 8544
New Zealand
Telephone (+64 3) 358 5029

christchurchairport.co.nz

10 September 2025

Hon Chris Bishop
Minister for Infrastructure
c/o Ministry for the Environment
PO Box 10362
Wellington

RE: **Christchurch International Airport Limited – Response to invitation to comment on application to refer Beachgrove Kaiapoi Expansion Project under the Fast Track Approvals Act**

Thank you for the invitation to Christchurch International Airport Limited (“**CIAL**”) to comment on the application by Momentum Land Limited (“**Applicant**”) to refer the Beachgrove Kaiapoi Expansion Project under the Fast Track Approvals Act 2024 (“**Application**”).

CIAL seeks to ensure that land use and development does not compromise the efficient operation of Christchurch International Airport (“**Airport / Christchurch Airport**”), which is regionally and nationally significant infrastructure.

The Application proposes residential subdivision and development (a noise sensitive activity) of land mapped in the 50dB Ldn Air Noise Contour of the Airport. CIAL considers that the Application poses a high risk of generating reverse sensitivity effects which has the potential to compromise the Airport’s operations and result in adverse health and amenity effects.

As such, under section 13(4)(j) of the Fast-track Approvals Act 2024 (“**FTAA**”), CIAL is affected by the Application and expects that it will be invited to comment on any future substantive application for the proposal.

Strategic Importance of Christchurch International Airport

Christchurch Airport is the largest airport in the South Island and is the second largest in the country. It is locally, regionally and nationally significant infrastructure and CIAL is a Requiring Authority under section 167 of the Resource Management Act 1991.

The Airport's international and domestic operations handle nearly 7 million passengers and over 100,000 aircraft movements annually. Unlike other airports in New Zealand and Australia, the Airport currently operates 24/7/365 without a curfew and is unrestricted as to the types of aircraft using it. This competitive point of difference supports the wellbeing of the region and nation, but it largely arises from careful historic management of activities in the Air Noise Contour.

Directive policies in the Canterbury Regional Policy Statement ("**CRPS**") require consent authorities to protect significant infrastructure such as the Airport from incompatible land uses and activities. The policy framework specifically requires the establishment of noise sensitive activities in areas exposed to aircraft noise levels of 50 dB Ldn or greater to be avoided, with limited exceptions.

The directive policy framework protects the integrity of the 50dB Ldn Air Noise Contour and consequently, supports the regional and national benefits of the Airport's operations. In this context, CIAL considers that great caution must be exercised when evaluating proposals for noise sensitive activities in the 50dB Ldn Air Noise Contour.

Interest in the Beachgrove Kaiapoi Expansion Project

The Application site is partly located in the operative 50dB Ldn Air Noise Contour under the Waimakiriri District Plan and the 'Remodelled Noise Contour' (collectively "**Noise Contours**"). New and/or intensified noise sensitive activities (including residential activities) within the Noise Contours are of significant concern to CIAL.

The purpose of the Noise Contours is twofold. It protects both:

1. the safe and efficient operation, use, future growth and development of Christchurch Airport; and
2. the health, wellbeing and amenity of people through avoiding noise sensitive activities within the Noise Contour.

Residential intensification in the Noise Contours has the potential to result in reverse sensitivity effects on the Airport including (for example) curtailment of operations, potential for the introduction of a curfew, or restrictions on aircraft types. Such effects would inhibit the significant benefits afforded by the Airport's current mode of operation.

The Noise Contours also protect the amenity and health physical health, mental health and wellbeing of the community. Given the Site is located within the Noise Contours, noise effects are an anticipated and known potential adverse effect which should be addressed by a referral application. CIAL is concerned as the Application has not identified such effects nor undertaken any general assessment of such effects on the amenity, health and wellbeing of the community.

Relevant to the Application, CIAL submitted and presented evidence in opposition to residential intensification in the Noise Contours at Kaiapoi, via the Proposed Waimakariri District Plan ("PDP"). CIAL also submitted and presented evidence opposing rezoning requests under the Noise Contour in Variation 1 to the PDP, which was the Waimakariri District Council's ("Council") intensification planning instrument under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021) ("Variation 1").

The Council's decision on the PDP and Variation 1 were notified on 12 July 2025. CIAL fundamentally disagrees with the Council's Decisions in respect of aircraft noise and rezoning under the Noise Contours and have since filed an appeal against the decision on the PDP and an application for judicial review in respect of decisions made on Variation 1.

The grounds for challenging the decisions on the PDP and Variation 1 include:

1. The decisions fail to correctly apply CRPS policy 6.3.5(4), which requires noise sensitive activities to be avoided in the Noise Contours at Kaiapoi;
2. The decision on Variation 1 errs in its interpretation of the Amendment Act and fails to properly apply the statutory requirements for qualifying matters.
3. The decisions fail to take into account evidence relating to the Remodelled Noise Contour and in doing so, disregards the most relevant evidence about the extent and effects of aircraft noise. The Council's decision fails to provide clarity and transparency in the planning framework, preventing decisions on residential intensification from being properly informed about current and future noise and reverse sensitivity effects;
4. The decisions fail to take into account evidence relating to adverse effects of exposure to aircraft noise including evidence of:
 - a. unacceptable amenity and health effects on people; and
 - b. adverse effects due to exposure to noise experienced outside.

The adverse impacts of aircraft noise are directly relevant to the determination of any future substantive application for the Application, in terms of the appraisal to be conducted under section 85(3) of the FTAA.

Conclusion

Christchurch Airport is regionally and nationally significant infrastructure. Its ongoing efficient and effective operation has economic, social and cultural significance for Canterbury and New Zealand.

CIAL considers the Application to be problematic, with potential to generate adverse reverse sensitivity effects that would compromise the Airport's operations and the health and wellbeing of the community. As CIAL is affected by the Application, if the referral Application is accepted, CIAL would seek to comment on any future substantive application that is referred to an expert panel for determination.

Yours sincerely,



Michael Singleton

Chief Strategy & Stakeholder Officer



Jesse Aimer

Senior Environment and Planning Advisor