



FW: FTAA-2510-1122 Parkburn - Information required to support Section 14 completeness check CRM:0419000005

From Daniel Thorne | Town Planning Group <[REDACTED]>
Date Thu 6/11/2025 12:44 PM
To Referral <referral@fasttrack.govt.nz>; Jess Hollis <[REDACTED]>
Cc DEWE, Gregory <[REDACTED]>

2 attachments (2 MB)

LINZ EMAIL 5.11.25.pdf; Te Rūnanga o Ngāi Tahu - PC21 Submission.pdf;

MFE CYBER SECURITY WARNING

This email originated from outside our organisation. Please take extra care when clicking on any links or opening any attachments.

Hi Jess,

Thanks for your email below, and our subsequent discussions. I have provided a response below that captures the further clarification on the nature of the Land Act approvals, along with clarification on the iwi consultation as per our discussions. Please let me know if you're keen to discuss or run through.

Other Approvals – Land Act

- The works proposed within the Crown land are limited in scope and generally comprise minor earthworks, earthworks for the cove construction, localised revegetation, and the construction / realignment of an existing recreational trail consistent with the existing public access network along the lake edge. These works are shown on the Crown Works Land Plan enclosed as Attachment [10] to the referral application, and are intended to provide for landscape integration, connectivity, and public access outcomes associated with the wider development. I note for completeness, that the 'Crown land' in this instance is the bed of Lake Dunstan, which is subject to the Land Act 1948 and administered by LINZ.
- In respect of the Land Act 1948, it is understood that any occupation of Crown land for these purposes would fall under Section 68 and require a Licence to Occupy to be granted by the Commissioner of Crown Lands. The purpose of this licence would be to authorise temporary occupation of the Crown parcel for the purpose of undertaking the identified works. It is also noted that the proposed works do not involve any permanent or exclusive occupation of the Crown land (noting there is an existing easement providing for the recreational trail). Rather, the works are temporary in nature and are either associated with development-related construction activities or the continuation of the existing recreational trail alignment. As such, the extent and duration of occupation would be minimal.
- Based on our discussions and correspondence with LINZ, we understand that whilst an application for a licence to occupy could be advanced at any time, their recommendation is that such an application is made when all consents and approvals have been obtained (refer **attached** email). This is considered the most efficient and pragmatic approach, recognising that any lease / licence would only be negotiated and executed when there is certainty on the detail of the works, and the works proceeding. Further, it is expected that ongoing engagement with key stakeholders (e.g. Kā Rūnaka, CODC, Contact Energy) will inform the specifics of the revegetation works and recreational trail outcomes across the Crown land. This reflects our position in the referral application, and confirms in our view that any applications under the Land Act can and should be reasonably undertaken independently of the fast track process. We do

however anticipate that if the referral application is successful, further engagement with LINZ in relation to the relevant licence / lease arrangements for the works would be undertaken, and can be further detailed in the substantive application as necessary.

- Overall, given the nature and scale of the proposed works, and particularly the fact that no permanent or exclusive occupation is proposed, we do not anticipate any issues of concern to LINZ, or any matters likely to delay project delivery, or indeed future processing and consideration of an application by a fast track panel. The activities are low impact and consistent with existing recreational and amenity outcomes for the area. For completeness, we also note that these works are not included within the first stage of the development programme, and there will be a significant earthworks programme required over the quarry area before any subdivision works are able to commence.

Project Description

- As advised, the last sentence of the project description should read 'external, not 'eternal'. We are otherwise comfortable with the description.

Iwi Consultation

As per our recent discussions, I have noted the following further explanatory comments around the engagement undertaken with iwi authorities / treaty settlement entities.

The consultation undertaken as part of the referral application involving reaching out to the following iwi authorities / treaty settlement entities (as per the FTAA terms and requirements), with this informed by our experience, and understanding of the current practice of MFE as outlined within recent referral applications in the district / region:

- Te Rūnanga o Ngāi Tahu
- Te Ao Mārama – representing Southland based Rūnanga (Waihōpai Rūnaka, Te Rūnanga o Awarua, Ōraka Aparima Rūnaka and Hokonui Rūnaka)
- Aukaha – representing Otago based Rūnanga (Te Rūnanga o Waihao, Te Rūnanga o Moeraki, Kati Huirapa ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga).

Prior to submission of the referral application, we received feedback from Te Rūnanga o Ngāi Tahu and Aukaha. Aukaha subsequently coordinated the involvement of Shane Ellison and Brett Ellison to represent and be the points of contact for the following Rūnanga who have expressed interests in the Cromwell area:

- Te Rūnanga o Moeraki Incorporated
- Kati Huirapa ki Puketeraki Incorporated
- Te Rūnanga o Ōtākou Incorporated
- Hokonui Rūnanga Incorporated

The above parties were termed the Kā Rūnaka parties, and represent the same parties who submitted on the prior plan change process for the site (PC21), and we understand from the Te Rūnanga o Ngāi Tahu submission on PC21 (**attached** FYI, refer Section 2.4), are the key mana whenua parties with interests in the Cromwell area.

As discussed, and outlined within the referral application, we have not yet received any direct feedback from Te Ao Mārama in regard to the referral application. I note Te Ao Mārama did not submit or have any involvement in the prior PC21 process. For completeness, we note that the Kā Rūnaka parties, for which a process agreement has been signed by the Applicant, includes Hokonui Rūnanga, who are represented by both Te Ao Mārama and Aukaha. However, no direct feedback has been received from Te Ao Mārama at this point in time, and subsequently, there has been no direct feedback from those other Southland based Rūnanga represented by Te Ao Mārama (i.e. Waihōpai Rūnaka, Te Rūnanga o Awarua, Ōraka Aparima Rūnaka). We understand these Rūnanga are based in Invercargill, Bluff, and Colac Bay. I note that I have again this morning reached out to Te Ao Mārama.

We understand MFE will make a determination as to who are the recognised iwi authorities / treaty settlement entities in the locale in line with the FTAA legislation, but equally understand that iwi will determine who is mana whenua. In that respect, we have sought to consult widely with iwi groups, and have signed a process engagement with the Kā Rūnaka parties who have expressed clear interest in the site, with these groups

consistent with those involved in the PC21 process, and recognised by the Ngai Tahu submission on PC21. This engagement will continue moving forward.

I trust the above clarifies matters, and enables confirmation of compliance with the relevant FTAA requirements. However, please let me know if you have any queries or require further clarification.

Cheers



Daniel Thorne – Director

s 9(2)(a)

Town Planning Group | www.townplanning.co.nz

Offices in Tāhuna & Ōtautahi

From: Referral <Referral@fasttrack.govt.nz>

Sent: Tuesday, 4 November 2025 10:50 pm

To: Daniel Thorne | Town Planning Group s 9(2)(a)

Cc: Jess Hollis s 9(2)(a)

Subject: FTAA-2510-1122 Parkburn - Information required to support Section 14 completeness check CRM:0419000005

Kia ora Daniel

Further to our discussion yesterday, the following information/clarification is required to support the Ministry's decision on whether the referral application for the Parkburn project complies with Section 14(2) of the Fast-track Approvals Act 2024 (FTAA):

Section 13(4)(t)

The planning report provided with the application outlines, in section 5.14, other approvals that are required to authorise the project, specifically a road stopping process by Central Otago District Council that is underway. Elsewhere in the planning report (sections 2.2.5, 3.3 and 8.7.2) reference is made to works proposed across Crown Land for which authorisations are required to be sought under the Land Act, which falls outside of the FTAA. Clarify/confirm the nature and scope of the other approvals required under the Land Act, with information to support the view that this can be reasonably advanced independently to the application process under the FTAA and will not prevent or significantly delay project delivery.

Please provide a response to the above no later than midday on **Thursday 6 November 2025**.

Further to the above, we have also drafted the following project description based on the information and scope presented in the application, and our discussion yesterday:

The project is to subdivide land and develop a mixed-use urban development at 922 Luggate-Cromwell Road (State Highway 6), Cromwell, located approximately 8 kilometres to the north of the Cromwell township. The project will include works to backfill and rehabilitate part of the existing Parkburn quarry site, and works within the State Highway 6 road reserve.

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

- *bulk earthworks to backfill and rehabilitate a quarry*
- *subdivision to create approximately 1000 allotments and enable construction of approximately 1000 residential units across a range of densities (which may be constructed by a person or persons other than the applicant)*
- *subdivision to create allotments and enable construction of a neighbourhood centre (which may include retail, commercial, medical and early childhood education activities) and a primary school (all of which may be constructed by a person or persons other than the applicant)*
- *landscaping and development of an open space network including recreation and esplanade reserves, and restoration along the margins of Parkburn Stream and Lake Dunstan/Te Wairere*
- *formation of two coves extending into Lake Dunstan / Te Wairere*
- *associated infrastructure, including for three waters services and transport (including eternal site access works)*

Can you please confirm as soon as possible whether this adequately describes the project, noting section 13(4)(a) specifies the requirement as: a description of the project and the activities it involves. If there is anything missing or incorrect, please provide alternative wording for us to consider incorporating into this draft description.

Ngā mihi

Jess Hollis