

To: Ministry for the Environment

From: Kerstin Ghisel – Barker & Associates Limited

Date: 18 May 2026

Re: Planning Memorandum for John Paterson Estates

1.0 Introduction

1.1 John Paterson Estates

John Paterson Estate Limited, as the applicant, has engaged Barker & Associates (B&A) to provide planning assessment of John Paterson Estates and seeks a referral under the Fast-track Approvals Act 2024 (FTAA) to enable the development of a master-planned residential neighbourhood at John Paterson Drive, which is located on the south-western edge of Christchurch. The proposed scheme plan is attached at **Attachment 1** which illustrates the proposed layout is well advanced but is however subject to change based upon more detailed investigations.

The key components of the project are:

- The proposal will establish approximately 510 residential lots.
- Four existing houses on the application site will be retained and will be located on larger lots.
- A new reserve and enhanced riparian margin adjacent to Knights Stream.
- The proposal incorporates an integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve and stormwater basins with associated wetland areas.
- A future onsite pump station.

Overall, the proposal is consistent with the matters set out in s22 of the Fast-track Approvals Act 2024, as it represents a well-developed and feasible residential development that will deliver significant regional benefits, including the provision of substantial housing supply within a recognised growth area and associated economic and social benefits. The project is supported by detailed technical assessments, which demonstrate that infrastructure servicing, transport access, and geotechnical conditions can be adequately provided for and managed, with no fundamental constraints to development. Potential natural hazard risks, including flooding, liquefaction and lateral spreading, have been identified and can be appropriately mitigated through established engineering and design responses, while the proposal integrates effectively with the surrounding transport network and existing urban form.

Referring the project to the fast-track approvals process will facilitate the John Paterson Estates project, including by enabling it to be processed in a more timely and cost effective way than under normal processes and is unlikely to materially affect the efficient operation of the fast-track approvals process.

In this context, the project clearly meets the criteria in s22, as it is of a scale and nature that will deliver significant regional benefits, and referral to the fast-track approvals process would facilitate the timely delivery of the project and is unlikely to materially affect the efficient operation of the approvals process.

2.0 Regional Significance of the Project

The Fast-track Approvals Act 2024 (FTAA) has established a framework that differs from the Resource Management Act 1991. The matters outlined in Sections 22(1)(a) and 22(2)(a) of the FTAA direct the considerations available to the Minister when assessing a project's eligibility for referral.

In summary, John Paterson Estates is a development project that will create economic benefits and address housing needs in terms of supply, type, and price at a scale that will provide significant regional benefits. The scale of the proposal will enable approximately 510 new homes and directly address the identified housing shortfalls within the Christchurch region. Furthermore, John Paterson Estates is generally consistent with the relevant strategic outcomes identified in local and regional planning documents.

We respond to the relevant Section 22(2)(a) considerations for the John Paterson Estates below.

Section 22(2)(a)(i) – 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:

While the project is not explicitly listed as a priority in a central government, local government, or sector plan or strategy, it fits well with the strategic intent and lens of the need to increase housing supply in the Christchurch Region. In this regard, the project aligns with the FTAA purpose of accelerating projects that deliver significant regional benefits, as set out below.

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):

The proposal enables the development of approximately 510 new residential units on approximately 37.7ha of land in Halswell. This represents a significant uplift in housing capacity in the local housing market. The economic assessment prepared by Insight Economics (**Attachment 2**) demonstrates that developments of more than 100 dwellings are considered highly significant within the Christchurch context in capacity terms for the reasons outlined above; at 510 dwellings, this proposal substantially exceeds that threshold. Christchurch continues to experience population growth and ongoing housing affordability pressures. Increasing supply at this scale improves the responsiveness of the housing market to demand, which in turn helps moderate long-term house price escalation. The proposal therefore directly supports the NPS-UD objective of providing at least sufficient development capacity to meet demand at all times.

The economic assessment identifies a material risk of insufficient feasible greenfield capacity over the medium term, driven by higher-than-assumed population growth, limited remaining greenfield supply, and heavy reliance on intensification outcomes that do not align with observed demand for standalone dwellings. The economic assessment notes that CCC's October 2025 Housing Capacity Assessment (HCA) identifies approximately 7,600 greenfield dwellings remain citywide and that, at recent uptake rates, this supply is likely to be exhausted in the medium term. Further, a Christchurch greenfield housing capacity assessment has been prepared by Colliers (**Attachment 3**) which concludes that the current stock of greenfield land will be exhausted in the short to medium term between 5.2 years and 6.2 years. Against this

context, the proposal is assessed as making a meaningful contribution to maintaining sufficient development capacity and supporting a more responsive housing market. Furthermore, by bringing a large quantum of developable land to market, the proposal strengthens land market competition. As recognised in the economic assessment, competitive land markets underpin housing market efficiency and affordability by discouraging land banking and encouraging timely development

The application site is located within Christchurch's southern growth area, adjoining existing residential neighbourhoods and close to major employment nodes, including the Hornby industrial area. This supports strong accessibility between housing and employment, reinforcing established growth patterns in the south-west where demand has consistently been high. The proposal represents a logical urban extension that integrates with existing infrastructure, transport networks and surrounding communities, avoiding fragmented development and supporting efficient infrastructure provision.

As a master-planned development, the proposal provides for coordinated infrastructure delivery, connected transport networks, and access to employment and services, all of which are key components of a well-functioning urban environment. The scale of development also enhances land market competition, encouraging timely development and supporting affordability outcomes. On this basis, the proposal supports a well-functioning urban environment and is consistent with section 22(2)(a)(iii) of the Fast-track Approvals Act.

Overall, based on the economic report and assessment above, the proposal will:

- Enable a significant increase in greenfield housing capacity in a high-demand growth area;
- Address emerging risks of insufficient feasible capacity in Christchurch's housing market;
- Align with established employment patterns and residential growth trends; and
- Support the efficient functioning of the wider urban economy.

For these reasons, and as concluded in the economic assessment, the proposal satisfies section 22(2)(a)(iii) by increasing housing supply and contributing to a well-functioning urban environment.

Section 22(2)(a)(iv) – will deliver economic benefits

In addition to increasing housing supply, the report quantifies the economic impacts of the development, estimating employment for more than 337 full-time equivalent workers over five years, approximately \$114 million in wages and salaries, and around \$191 million in GDP within Canterbury. When compared to long-term rural production scenarios, residential development generates substantially greater GDP, employment and wages, even over a 50-year horizon. These findings reinforce that transitioning the land to residential use not only increases housing supply but supports the wider functioning of the urban economy.

Section 22(2)(a)(vii) – will support climate change mitigation, including the reduction or removal of greenhouse gas emissions

The proposal will support climate change mitigation and contribute to the reduction of greenhouse gas emissions, consistent with national direction under the Climate Change Response Act 2002 and emissions reduction targets.

The project promotes a consolidated urban form by delivering coordinated residential development in a planned and serviced location, rather than enabling dispersed rural or ad hoc development. Concentrating growth in proximity to existing urban areas, employment, education, and community facilities reduces vehicle kilometres travelled and supports lower transport-related emissions over the long term.

The development will integrate active transport connections, pedestrian and cycle infrastructure, and linkages to existing and planned public transport networks. This will support modal shift and reduce reliance on private vehicles. The presence of Knights Stream adjacent to the application site provides an opportunity to establish off-road shared pathways within landscaped riparian margins. These connections will create a safe and attractive environment for pedestrians and cyclists, separated from vehicle traffic, thereby further encouraging active transport and contributing to reduced transport-related greenhouse gas emissions.

The application site is situated within the southwestern edge of Christchurch City, which is serviced by an expanding Christchurch cycle network of dedicated cycleways and shared paths. CCC's Major Cycle Routes and local cycle links provide connections between suburbs, town centres, schools and recreational areas, with over 75km of cycleways now operational and planned extensions underway. The development's proposed active transport infrastructure (including safe off-road shared paths adjacent to waterbodies) will provide direct and attractive links to the existing and planned cycle network, enhancing connectivity and supporting modal shift toward active transport.

At a building and infrastructure level, the proposal can incorporate energy-efficient design and infrastructure in accordance with current Building Code requirements, with the opportunity to integrate renewable energy solutions and low-emissions technologies at the detailed design stage. The coordinated provision of three-waters and infrastructure services also enables more efficient and lower-emission servicing compared to dispersed development patterns.

In addition, the proposed landscaping, ecological restoration and riparian enhancement planting will contribute to carbon sequestration over time, while also enhancing biodiversity and increasing climate resilience through improved shading, stormwater management, and habitat connectivity.

The proposal will also assist in minimising greenhouse gas emissions through both construction practices and masterplan design. During construction, emissions will be reduced through measures including:

- Minimising truck movements associated with earthworks by retaining and reusing excavated material on site where practicable; and
- Adopting a staged construction approach to enable efficient programming of works and reduce unnecessary vehicle trips and plant use.

At the draft masterplan level, the layout and orientation of blocks and lots have been designed to promote energy efficiency. Lot orientation and street layout will optimise opportunities for passive solar gain, natural light penetration, and energy-efficient building design. This will support reduced operational energy demand for future dwellings and contribute to lower long-term emissions.

Overall, the proposal supports climate change mitigation by incorporating low-emissions construction practices, enabling energy-efficient urban form, and enhancing carbon sequestration through planting. In doing so, it contributes positively toward reducing net greenhouse gas emissions over both the short and long term.

Section 22(2)(a)(x) – is consistent with local or regional planning documents, including spatial strategies

Overall, John Paterson Estates is consistent with the relevant local and regional planning documents, as set out in section 5.5 and 5.6 below.

2.1 Benefit of the Fast-track Approvals Act (2024) for John Paterson

As outlined in Section 22(1)(b)(i) and (ii), part of the determination for accepting a referral application includes outlining whether the FTAA process would facilitate a more efficient and timely delivery of the project.

(b) referring the project to the fast-track approvals process—

i. would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and

ii. is unlikely to materially affect the efficient operation of the fast-track approvals process.

The fast-track process will enable the project to be processed in a more timely and cost-efficient manner than under the normal process, for the following reasons:

- Under the Fast-track Approvals Act 2024, expert panels will consider required approvals as a single application package, as opposed to the normal process where several applications would be required for the different activities and to different authorities;
- Under the Fast-track Approvals Act 2024, public and limited notification is precluded, expert panels are only permitted to invite comments from specified persons who have a short timeframe to provide comment. Given the scale of this development, it would likely be a fully notified application under the Resource Management Act 1991 which would significantly slow down the consenting process and add to cost, taking into account the appeal rights enabled under the standard RMA process;
- Under the Fast-track Approvals Act 2024, timeframes are shorter and stricter than that of the normal process resulting in significant less time for obtaining resource consent and efficiencies for the project; and
- There is resourcing in place to process the application efficiently and certainty around timeframes for the applicant to ensure the project remains 'shovel ready'.

As outlined in Section 4.0, John Paterson Estates requires a range of resource consents (land use, subdivision, discharge, dewatering) from CCC, the Canterbury Regional Council, and potentially approvals under the Wildlife Act 1953, an archaeological approval under the Heritage New Zealand Pouhere Taonga Act 2014 and approvals relating to complex freshwater fisheries activities. The ability to apply for a comprehensive range of consenting requirements within one application, to be considered by one panel, offers significant efficiencies in planning and specialist inputs. It also supports strategically integrated decision-making.

3.0 s13(4) – A Description of the Project - Proposal and Effects

3.1 Site Description

The application site comprises of land located along John Paterson Drive on the south-western edge of Christchurch (Figure 1). The site has a total area of approximately 37.7ha and forms part of the southern urban fringe of the Halswell area, adjoining the Halswell West residential development area. The site is located south of the Christchurch Southern Motorway (SH76) and is generally flat pastoral land characteristic of the Halswell plains environment. John Paterson Drive runs centrally through the site and provides the primary access to the surrounding transport network. Knights Stream traverses along both the eastern and south-eastern boundary of the site and forms the principal natural feature within the local landscape. The site also has a narrow frontage to Marshs Road, which adjoins a CCC stormwater treatment wetland.

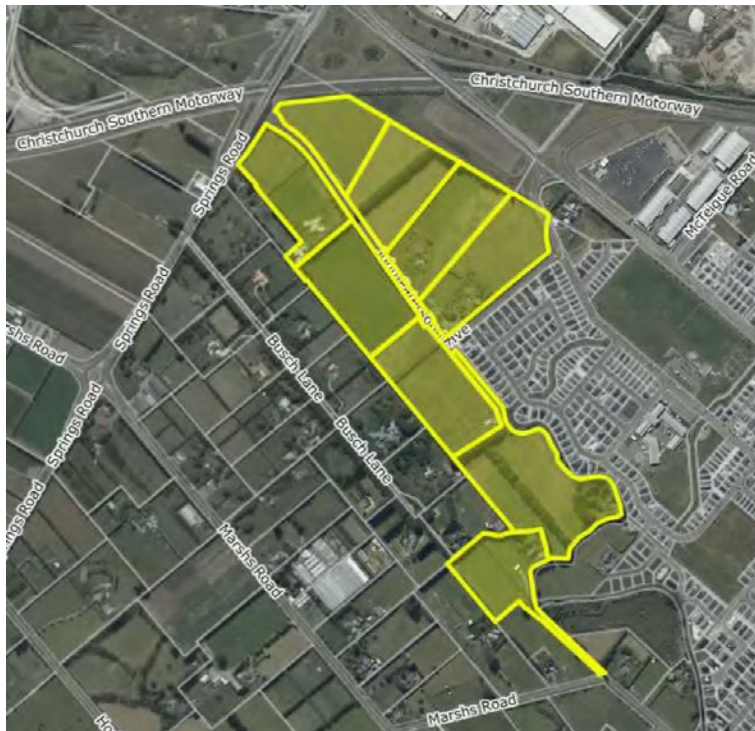


Figure 1: The application site

Immediately north of the site is the Christchurch Southern Motorway corridor and the Springs Road overbridge, which carries Springs Road over the motorway and provides an important north–south transport connection within the Halswell area (Figure 2). A noise attenuation bund has been constructed along the northern boundary of the site to mitigate motorway noise effects. Beyond the bund is a large stormwater basin that receives runoff from the motorway corridor. This basin discharges to a drainage channel that flows along Richmond Avenue and John Paterson Drive before entering the upper reach of Knights Stream, which traverses along the northeastern and southeastern boundary of 26 John Paterson Drive.



Figure 2: John Paterson Drive looking towards the flyover Springs Road

The current use of the site comprises a mixture of rural and rural-residential activities. Existing residential units and associated outbuildings are located at several properties along John Paterson Drive (6, 15, 19 and 26 John Paterson Drive). Additional farm sheds are present on a number of properties (5, 6, 19 and 20 John Paterson Drive) and the balance of the site is divided into paddocks used for pastoral grazing.

Vegetation cover across the site is predominantly pastoral grassland, and there are limited areas of established trees and shrubs are present, primarily along property boundaries and in association with the Knights Stream corridor. The land is generally flat to gently sloping.

The site lies over both the unconfined/semiconfined and the coastal confined gravel aquifer system within Canterbury Maps. The Canterbury Regional Council (CRC) Wells and Bores data layer within the Canterbury Maps web viewer shows that four wells are located within the site. Initial groundwater level readings from each well are as follows:

- M36/4168 - 7.40m below ground level, recorded on 14 March 1990
- M36/8070 - 5.20m below ground level, recorded on 16 March 2006
- M36/7502 - 4.70m below ground level, recorded on 17 November 2003
- M36/4190 - 3.70m below ground level, recorded on 29 May 1990

Groundwater readings indicate depths to the water table generally increases to the north-west across the site. Readings from nearby wells sourced from Canterbury Maps indicate that groundwater in the area is prone to seasonal fluctuations. Local groundwater levels may also vary with rainfall levels over shorter time intervals.

The well borehole logs generally indicate sands and silts overlying gravels at depths between 2.5m and 7.5m below ground level to the termination depth of the well boreholes. The direction of groundwater flow is generally south-easterly.

3.2 Record of Titles and Interests

Table 1: Application site's legal descriptions

Address	Appellation	Record of Title	Landowner Name	Area (ha)
5 John Paterson Drive	Section 1 Survey Office Plan 560474	1003831	s 9(2)(a)	3.0488
6 John Paterson Drive	Section 10 Survey Office Plan 480694	987857		3.8093
9 John Paterson Drive	Lot 2 DP 318764	73542		3.9991
14 John Paterson Drive	Lot 7 DP 318764	73547		4.324
15 John Paterson Drive	Lot 3 DP 318764	73543		3.9971
19 John Paterson Drive	Lot 4 DP 318764	73544		4.46
20 John Paterson Drive	Lot 6 DP 318764	73546		4.4573
26 John Paterson Drive	Section 16 Survey Office Plan 480694	725470		6.3947
479 Marshs Road, Halswell	Lot 2 DP 81077	CB47A/324		3.2232

This application is being made by the Applicant on behalf of all the current owners. The project is proposed to be undertaken by the Applicant in partnership with the landowners, with joint venture arrangements to be finalised.

Several consent notices and easements are registered on titles within the development area; however, these will be varied separately following fast-track approval. This two-step approach is not uncommon in resource consent processes under the RMA, in which other authorisations are obtained following the issue the resource consent. Any relevant easements and consent notices that may need to be varied as a result of this development are outlined in **Attachment 4**. This is the most efficient way to progress the development and will not materially affect the implementation of the proposed development.

3.3 Surrounding Area

The surrounding environment reflects the transitional nature of the Halswell urban fringe. Residential development associated with the Knights Stream subdivision and the wider Halswell West growth area is located to the east and north-east of the application site. Industrial land uses occur further to the north and north-west near the motorway corridor, while surrounding areas include rural-residential properties, stormwater infrastructure, and vegetated stream corridors associated with Knights Stream. The Knights Stream School is located approximately 130m east of the application site.

3.4 The John Paterson Proposal and Activities Proposed

John Paterson Estate Limited seeks a referral under the Fast-track Approvals Act 2024 (FTAA) to enable the development of a master-planned residential neighbourhood at John Paterson Drive, which is located on the south-western edge of Christchurch. The proposed indicative high-level scheme plan is attached at **Attachment 1**, which illustrates the proposed layout is well advanced but is however subject to change based upon more detailed investigations.

The key components of the project are:

- The proposal will establish approximately 510 residential lots.
- Four existing houses on the application site will be retained and will be located on larger lots.
- A new reserve and enhanced riparian margin adjacent to Knights Stream.
- The proposal incorporates an integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve and stormwater basins with associated wetland areas.
- A future onsite pump station.

3.4.1 Transport

The proposed roading and access arrangements is set out within the transport assessment in **Attachment 5**. In summary the proposal includes the following key roading arrangements:

- Primary access to the new residential neighbourhood will be from John Paterson Drive, with an internal street hierarchy supporting clear wayfinding.
- Future road connections have been included along the southwestern boundary, shared with the properties along Busch Lane, allowing for connections to any potential future development at that location.
- The street network within the proposal is supported by reserves, green links, and connections to existing cycle routes.
- Publicly accessible cycling and/or walking tracks will be provided through the greenspace network, and along the site's Knights Stream margins.

3.4.2 Three Waters

The proposed three waters strategy for the application site is set out in the infrastructure report which has been prepared by DLS (**Attachment 6**). By way of summary, the following strategies are proposed.

Water Supply

The primary water supply connection to the application site will be to the existing 150mm dia pipework at the corner of Richmond Ave and John Paterson Drive. The pipes in this location are expected to be extended further along their respective roads and into the development area. Subject to modelling, the 150mm existing pipes may need to be upgraded. A connection may also be made under Knights Stream and into the 100mm main on Tongariro Street. Together, these connections will not be adequate to provide water supply to the proposed development area. A further connection will need to be made to the 560mm PE100 trunk main that runs along the northeast boundary. This trunk main connects to the site directly to the Wilmers Road Reservoir. The length of pipe that has been laid under the southern motorway is yet to be commissioned but Council has advised that work is imminent and will not hamper the water supply to the proposed development.

Wastewater

Communications with Christchurch City Council (CCC) have confirmed that the proposed development can connect to the existing Christchurch City wastewater network at manhole WwAccessID 43468 located at the corner of Tongariro and Harz Streets. The outlet from this manhole is a 225mm uPVC gravity pipe. Council has supplied a memo detailing the downstream network as far as PS115 has spare capacity for 585 additional lots which is attached to the Infrastructure Report. The CCC memo does make a proviso that the pumps in PS115 would need upgrading and that would be the responsibility of the applicant.

The proposed development will not be able to gravitate to the receiving manhole. A new pump station will need to be installed in the proposed development and all wastewater would need to be pumped under Knights Stream to Harz Street. The sanitary sewer pipes in the new streets will be a gravity network and designed and sized to Council standards.

Stormwater and Flooding

The flood model shows the channelisation of flood water in natural depressions across the site and along existing streets. Flow follows the direction of the contour being towards the southeast and into Knights Stream. Flood inflow onto the proposed development area appears to originate from the Christchurch Southern Motorway basins to the northeast and a major flow channel from 15 Busch Lane. Both of these inflows will be maintained as part of any future development. The flows from the basins will be restricted to the future road network and the flows from 15 Busch Lane can flow directly into the future adjacent stormwater reserve.

The site is not affected by any Flood Management Areas as dictated by the Christchurch District Plan (CDP). Stormwater discharge will eventually be discharged into Knights Stream which ultimately discharges into the Halswell River. Runoff from roads will require treatment and storage, this will occur in stormwater basins to be constructed by the developer in the southern portion of the application site as shown on the proposed draft scheme plan. The stormwater facilities will be sized in accordance with the CCC's Waterways, Wetlands and Drainage Guide (WWDG), and to ensure the conditions of the global discharge consent are met the facilities will also be designed in accordance with the Huritini Halswell Stormwater Management Plan. A

preliminary stormwater treatment plan and sizing of the facilities have been undertaken and is attached to the Infrastructure Report (**Attachment 6**).

Stormwater will initially drain to a first flush basin with a four-day detention time. Flows from the first flush basin will drain to a wetland prior to being discharged to Knights Stream. There is potential for the existing adjacent Council Wetlands to be extended. The flows exceeding the first flush basin will overtop to a detention basin.

Further investigations will be made into the direct discharge of roof water to ground. This will only be able to be achieved in areas of gravel and where the water table is at least 3m deep. The geotechnical report provided as part of this referral application shows that these areas are available but further investigation will be required prior to a full delineation of the suitable conditions. The volume of roof water draining to ground will reduce the size of the stormwater treatment and storage facility.

3.4.3 Power and Telecommunications

All cables will be placed underground, and all kiosks will be constructed on separate individual lots. Power and telecommunications will be made available to the proposed lots and will not be an inhibitor for development of this land.

3.4.4 Staging

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

3.4.5 Ineligible Activities and Prohibited activities

The project does not involve any ineligible activities, and it does not involve any activities that are prohibited activities under the Resource Management Act 1991.

3.5 Christchurch District Plan

The application site is zoned Rural Urban Fringe within the CDP, which covers the flat land adjacent to metropolitan Christchurch (Figure 3). The zone provides for rural productive activities and the use of existing sites between 1ha and 4ha for rural residential units while avoiding the creation of new sites of less than 4ha for rural residential units.

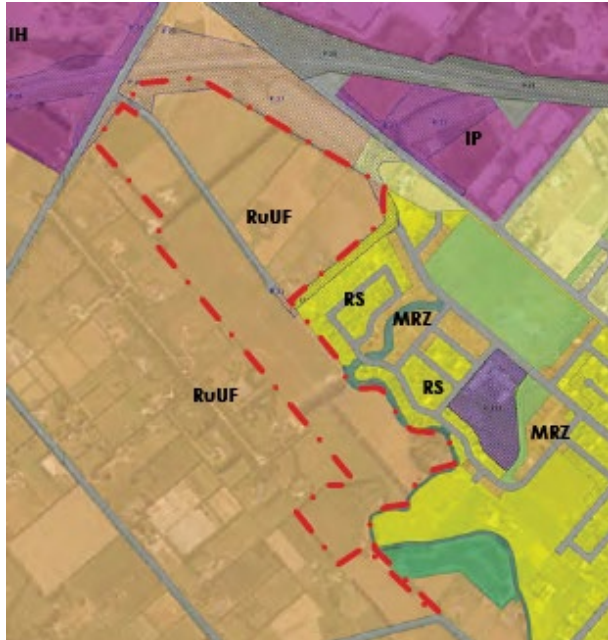


Figure 3: Zoning and P23 designation (Source: CDP)

Roading overlays

John Paterson Drive is classified as a Local Road within the CDP's roading hierarchy. Springs Road, which bounds the site to the west is classified as a Minor Arterial. Halswell Junction Road which is located to the north of the application site is classified as a Major Arterial.

The Christchurch Southern Motorway bounds the site to the north and is classified as a Major Arterial. It is also designated (P21) with NZTA as a Requiring Authority and the purpose of the designation is for motorway purposes.

There is approximately 7,000m² of the application site which is subject to a NZTA future works designation related to Christchurch Southern Motorway works (Figure 3). This designation is set to expire in 2028; however, works were completed in 2021, with no further works anticipated at this time. A portion of John Paterson Drive is also covered by the same designation.

Natural Hazard Overlays

In terms of natural hazards, the whole of the application site is located within the Liquefaction Management Area (LMA). The site is not located within any of the CDP's flooding overlays.

Knights Stream

Knights Stream is located adjacent to the application site and is identified within the CDP planning maps as a network waterway (Halswell Junction Outfall) with the downstream section of Knights Stream is identified as an Environmental Asset Waterbody (Figure 4).

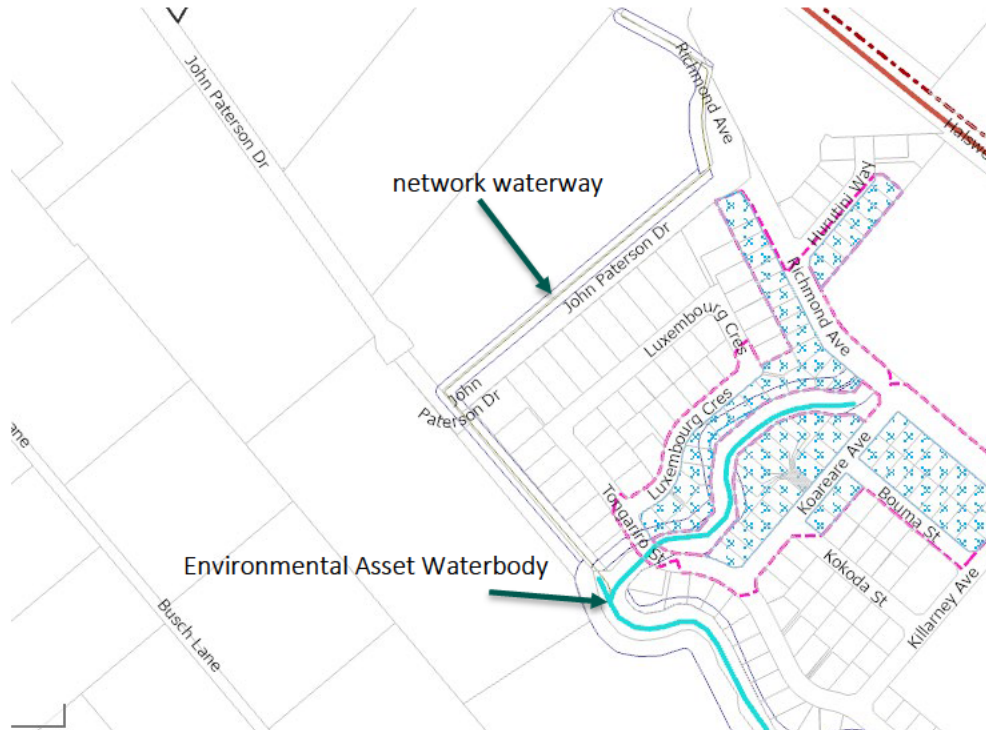


Figure 4: Knights Stream classification within CDP's planning maps

3.6 Surrounding Zoning

The site is located on the outskirts of the Christchurch City urban area, with residential development located to the east which comprises a mix of zoning, including Residential New Neighbourhood (pale yellow area within Figure 3), Residential Suburban (bright yellow area within Figure 3) and Medium Density Residential (orange area within Figure 3). The land to the west, on the western side of Springs Road is zoned Industrial Heavy (purple area within Figure 3). The land to the south is zoned Rural Urban Fringe (brown area within Figure 3).

The land to the east of the application site is also located within the Residential Medium Density Overlay (the blue crossed area within Figure 4) and within the Urban Intensification Area within the CDP (the pink outlined area within Figure 4).

Outline Development Plan

The land to the east of the application site is included within the Halswell West Outline Development Plan (ODP) area at Appendix 8.10.6 Residential Suburban and Residential Medium Density - Halswell West (Figure 5). The ODP shows Knights Stream as a significant habitat corridor and waterway.

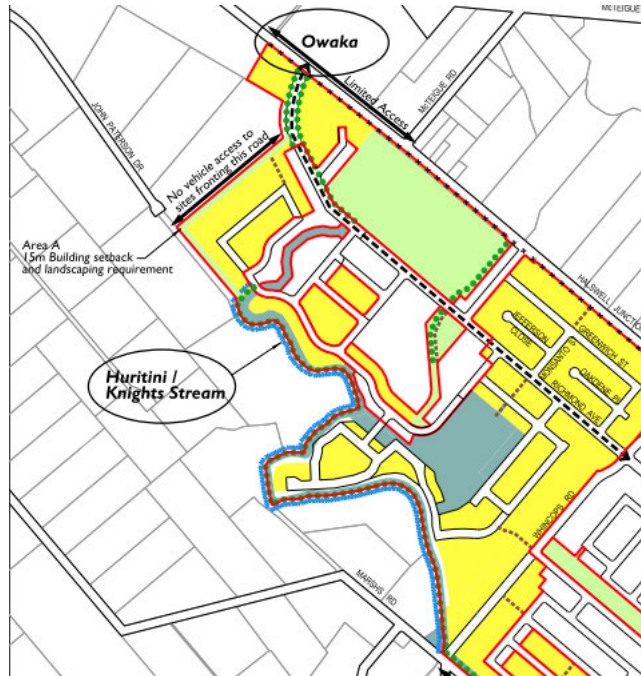


Figure 5: Halswell West Outline Development Plan

The land to the north and west of the site are within the Wastewater Discharge Restriction Area Overlay, which covers areas with wastewater network restrictions, requiring consent for any activity which results in a daily average sewage flow in excess of 0.09 litres per second, per hectare, into Council's reticulated network.

4.0 Reasons for Consent

At this FTAA referral stage, we have identified that the proposal would potentially trigger resource consent under the Wildlife Act 1953, Heritage New Zealand Pouhere Taonga Act 2014, Freshwater Fisheries Regulations 1983, Christchurch District Plan, the Canterbury Land and Water Regional Plan, Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NESC) and NES:F for the reasons listed below. This list is not exhaustive and is based upon the information available to date. Further consent triggers may be identified as the proposal develops.

4.1 Christchurch District Plan

Chapter 5 Natural Hazards

Liquefaction hazard

- The proposal is for a vacant lot residential subdivision in the liquefaction management area and consent is required for a **Controlled Activity** under Rule 5.5.2 C1.

Chapter 6 General Rules and Procedures

Activities near infrastructure

Consent may be required under the following rules; however, it is anticipated that future residential units can be designed to comply with the relevant acoustic standards:

- The proposed residential units listed in Rule 6.1.7.2.1 (Sensitive activities near roads and railways) that exceeds any noise limits in the activity standards for those activities by 10 dB or less would require resource consent for a **Restricted Discretionary Activity** under Rule 6.1.7.1.3 RD1.
- The proposed residential units listed in Rule 6.1.7.2.1 (Sensitive activities near roads and railways) that exceeds any noise limits in the activity standards for that activity by more than 10 dB would require resource consent for a **Non-Complying Activity** under Rule 6.1.7.1.5 NC4.

Waterbody Setbacks

- Earthworks may require resource consent as a **Restricted Discretionary Activity** under Rule 6.6.4.3 RD1 within the setback of the waterbodies.
- New buildings, other structures or impervious surfaces may require resource consent as a **Restricted Discretionary Activity** under Rule 6.6.4.3 RD2 within the setback of the waterbodies.
- Any proposed water body bank maintenance or enhancement works that do not meet one or more of the activity specific standards would require resource consent as a **Restricted Discretionary Activity** under Rule 6.6.4.3 RD4.

Chapter 7 Transport

- Any activity that does not meet any one or more of the standards in Rule 7.4.3 'Standards - Transport (All zones outside the Specific Purpose (Lyttelton Port) Zone)' would require resource consent as a **Restricted Discretionary Activity** under Rule 7.4.2.3 RD1.

Chapter 8 Subdivision, Development Earthworks

Subdivision

- The proposal will involve a subdivision to create allotments for access, utilities, roads and reserves and is classified as a **Controlled Activity** at Rule 8.5.1.2 C4.
- Subdivision in a rural zone resulting in allotments that does not meet the minimum net site area of 4ha is classified as a **Discretionary Activity** under Rule 8.5.1.4 D1.
- The proposal will involve creating lots less than 4ha in area and is therefore a **Non-Complying Activity** under Rule 8.5.1.5 NC4 and results in a non-compliance with Activity Standard Rule 8.6.1 'Minimum net site area and dimension'.

Earthworks

- The proposed earthworks will exceed the permitted volume and depth and therefore resource consent will be required under Rule 8.9.2.3 RD1 as a **Restricted Discretionary Activity**.

Chapter 17 Rural

- If any activity does not meet one or more of the built form standards, then resource consent for a **Restricted Discretionary Activity** is required under Rule 17.5.1.3RD1.
- If any conservation activities are proposed which do not meet one or more of the activity specific standards then resource consent is required for a **Restricted Discretionary Activity** under Rule 17.5.1.3RD2.
- If any recreational activities comprising of buildings and/or impervious surfaces that have in combination equal to or exceeding 100m² but less than 500m² then resource consent is required for a **Restricted Discretionary Activity** under Rule 17.5.1.3RD8.
- If any new community facilities are proposed, then resource consent is required for a **Restricted Discretionary Activity** under Rule 17.5.1.3RD9.
- If any recreation activities proposed and the area of buildings and/or impervious surfaces in combination is equal to or exceeds 500m² then resource consent for a **Discretionary Activity** is required under Rule 17.5.1.4D5.
- Rule 17.5.1.5 NC1 is a catch all rule as it outlines that any activity not provided for as a permitted, controlled, restricted discretionary, discretionary or prohibited activity is classified as **Non-Complying Activity**. Consent may be required under this rule.
- Consent will be required under Rule 17.5.1.5 NC3 for any residential activity and/or minor residential unit that does not meet the activity specific standards in Rule 17.5.1.1 P5 as a **Non-complying Activity**.

Chapter 18 Open Space

- Any activity listed in Rules 18.8.1.1 P4, P8, P9, P10, P13 and P20 which requires the construction of a new building, except as specified in Rules 18.8.1.3 RD8. If any buildings are proposed within this zone (i.e. a bridge over the waterbody) then resource consent may be required for a **Discretionary Activity** under Rule 18.8.1.4 D2.

- Any activity not provided for as a permitted, controlled, restricted discretionary, or discretionary activity is classified as a **Non-Complying Activity** under Rule 18.8.1.5 NC1.

4.2 Canterbury Land and Water Regional Plan

General Rules

- Consent could be required under Rule 5.6 for a **Discretionary Activity** depending on the proposed construction methodology regarding the waterbodies within and adjoining the application site.
- Water permit (s14): For the non-consumptive take of water from Knights Stream and discharge of that water back into the watercourse.
- Discharge permit (s15): For the discharge of construction phase stormwater and operational phase stormwater if the project cannot operate under CCC's global consents.

Sewerage Systems

- The use of land for a community wastewater treatment system and the discharge of sewage sludge, bio-solids and treated sewage effluent from a community wastewater treatment system and the discharge of sewage sludge and bio-solids from an on-site wastewater treatment system into or onto land, or into or onto land in circumstances where a contaminant may enter water are **discretionary activities** under Rule 5.84.
- The discharge of treated sewage effluent into surface water or a wetland is a noncomplying activity under Rule 5.86.

Reticulated Stormwater Systems

- Rule 5.93 relates to the discharge of stormwater onto or into land or into or onto land in circumstances where a contaminant may enter water, or into groundwater or a surface waterbody, as a restricted discretionary activity. The operational phase stormwater may require resource consent for a **Restricted Discretionary Activity** under Rule 5.93 if written permission cannot be provided from CCC to use their reticulated system.

Construction Phase Stormwater Discharge not discharged from a Reticulated Stormwater System

- Rule 5.94A relates to the discharge of construction-phase stormwater, other than into or from a reticulated stormwater system onto or into land in circumstances where a contaminant may enter groundwater. The proposal is unlikely to comply with Condition 1 of Rule 5.94A as while earthworks will be staged there is potential for the discharge to occur from more than one stage and therefore the area could exceed 2ha in area. Consequently, the proposal could require consent under Rule 5.94B and be classified as a **Restricted Discretionary Activity**.

Stormwater not discharged from a Reticulated Stormwater System

- If the proposed discharge of stormwater is not from a reticulated stormwater system, then consent is likely required under Rule 5.97 as a **Non-Complying Activity** as the site is from, into or onto contaminated or potentially contaminated land and therefore does not comply with the conditions associated with Rules 5.95 and 5.96.

Discharge of contaminants into surface water

- Rule 5.99 relates to the discharge of water or contaminants into surface water or onto or into land in circumstances where it may enter surface water that is not classified by any of the previous rules. If the proposal cannot comply with the conditions associated with this permitted activity rule, then consent need to be sought under Rule 5.100 for a **Discretionary Activity**.

Small and Community Water Takes

- Rule 5.113 relates to the taking and using of less than 5L/s and 10m³ per property per day of groundwater as a permitted activity, provided the bore is located more than 20m from the property boundary, or any surface waterbody. The proposal may involve the taking water from existing onsite wells to fill the water carts which will be used to manage onsite dust because of the proposed earthworks. Onsite wells are currently located over 20m from the site's boundaries and any surface waterbody. The proposal is a **Permitted Activity** under Rule 5.113.

Site Dewatering

- Rule 5.119 relates to the taking of water from groundwater for the purpose of dewatering for carrying out excavation, construction, maintenance and geotechnical testing and the associated use and discharge of that water is a permitted activity, provided a proposal can comply with the conditions. The proposal may require consent as a **Restricted Discretionary Activity** under Rule 5.120 if it cannot comply with all the conditions associated with Rule 5.119.

Dams and Damming

- Rule 5.154 provides for the damming of water in the bed of a river and the constructing, using, altering, maintaining and operating of dam structures within the bed of a river, including any damming or impounding of water outside the bed of a river or natural lake as a permitted activity. If the proposal cannot comply with the conditions associated with Rule 5.154 then it is classified as a Non-Complying Activity under Rule 5.156.

Earthworks over an Aquifer

- Rule 5.175 relates to the use of land to excavate material. The proposal is unlikely to comply with the conditions associated with the permitted activity because there is likely to be less than 1m between undisturbed material and groundwater and the proposed excavations will be occurring within 50m of a surface waterbody. The proposed earthworks would then be classified as a **Restricted Discretionary Activity** under Rule 5.176.

Take and Use Surface Water

- Rule 5.126 is for the non-consumptive taking and use of water from a lake, river or artificial watercourse and discharge of the same water to the same lake, river or artificial watercourse and is classified as a **Restricted Discretionary Activity**, provided the relevant conditions are met. This rule would apply if the proposal involves the over-pumping from any river or artificial watercourse for the duration of the works.

Structures

- The placement, installation, erection, reconstruction, alteration or removal of any structure, excluding dams, on, in or under the bed of a river, and including any associated excavation, disturbance, diversion and discharge in the bed of a lake or river, or any diversion or discharge in an artificial watercourse, that does not comply with Rules 5.135 to 5.141 is a **Discretionary Activity** under Rule 5.141A. Consent may be required depending on the proposed construction methodology.

Wetlands

- Rule 5.159 relates to the creation of a wetland, including the associated taking, use, damming or diversion of water from groundwater or surface water, and discharge of excess or overflow water from the wetland into surface water and is provided as a Permitted Activity. If the creation of a wetland does not comply with one or more of the conditions in Rule 5.159 then it is classified as a **Discretionary Activity** under Rule 5.160.

Vegetation in Lake and Riverbeds

- Consent may be required under Rule 5.169 for a **Restricted Discretionary Activity** if the proposed vegetation clearance and earthworks within the riparian margins does not comply with one or more of the conditions in Rules 5.167 or 5.168.

4.3 Canterbury Air Regional Plan (CARP)

- Rule 7.32 relates to the discharge of dust to air beyond the boundary of the property of origin from the construction of buildings, land development activities, unsealed surfaces or unconsolidated land, as a permitted activity provided the relevant conditions are met. The proposal is likely to be able to comply with all the conditions and be classified as a **Permitted Activity** under Rule 7.32.

4.4 National Environmental Standards

4.4.1 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NESCS) sets a nationally consistent set of planning controls and soil contaminant values. A Preliminary Site Investigation (PSI) has been undertaken by Momentum Environmental Limited (attached at **Attachment 7**) and shows the site was used for general pastoral purposes until being subdivided in 1997, with most lots developed for rural residential use thereafter. The following potential sources of contamination have been identified as per the Hazardous Activities and Industries List (HAIL):

- A livestock dip or spray race operation previously located in the south-west corner of 6 John Paterson Drive (HAIL A8).
- Fuel and chemical storage occurring at 6, 19 and 20 John Paterson Drive (HAIL A17).
- A potential rubbish pit visible on aerial photographs from approximately 1994 to 2011 at 20 John Paterson Drive (HAIL G5).
- Multiple existing and previous burn areas located at the site (HAIL I).

- Storage of items along the southern treeline at 26 John Paterson Drive (HAIL I).
- The use of part of 5 John Paterson Drive as a yard area during the construction of the Christchurch Southern Motorway (HAIL I).

As the PSI has identified evidence of HAIL activities occurring on the site, the NESCS applies to the proposal, and resource consent may be required for the future subdivision, change of land use and soil disturbance activities. A DSI is currently being progressed and will form part of the documentation required under the substantive application to determine the exact extent and locations of any contamination. Onsite contamination can be appropriately managed to accommodate urban development, including through a Remediation Action Plan (RAP) and Site Management Plan (SMP).

Resource consent will be required under Regulation 10 of the NESCS as a **Restricted Discretionary Activity**. On this basis, any requirements of the NESCS can be addressed as part of an application post-referral and potential risks to human health can be appropriately managed and mitigated.

4.4.2 National Environmental Standard for Freshwater

The Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F) sets standards to regulate activities that pose risks to the health of freshwater bodies and freshwater ecosystems, including rivers, streams and natural inland wetlands.

An ecological assessment has been prepared by Aquatic Ecology for the application site (**Attachment 8**). The assessment notes that the upper swale of Knights Stream is present along a portion of the southern and southeastern boundary of the application site. Knights Stream is classified as a spring-fed plains waterway in the Canterbury Maps Viewer GIS. The ecological assessment concludes that the application site was devoid of natural wetlands as referred to in the NES-F. The land use in the area is predominantly agricultural, therefore pastoral grassland is the main vegetation form. The ephemeral course of Knights Stream where it borders the application site also lacked surface water and wetland vegetation.

Consent may be required for a Discretionary Activity under the NES-F for under Regulations 57 if any reclamation of the bed of the adjoining waterbodies is proposed. Consent may also be required under Regulation and 71 if any culverts are proposed.

4.5 Other Approvals

4.5.1 Wildlife Act 1953

The project may need approval under the Wildlife Act 1953 due to the potential presence of lizards and bats, however this is subject to further ecological assessments which will be prepared as part of the substantive application.

4.5.2 Heritage New Zealand Pouhere Taonga Act 2014

Approval may also be required under the Heritage New Zealand Pouhere Taonga Act 2014 and this will be confirmed as part of the substantive application. The applicant has engaged an archaeologist, and this reporting will form part of the substantive application.

4.5.3 Freshwater Fisheries Regulations 1983

Approval may also be required under the Freshwater Fisheries Regulations 1983 in regard to the construction of any dam or culvert in Knights Stream depending on the proposed construction methodology.

5.0 Description of Effects and Significance of those Effects

Section 13(4)(h) requires a description of anticipated and known adverse effects on the environment, and the significance of those effects.

The proposal is not expected to generate any significant adverse environmental effects. Any adverse effects on the environment will be appropriately avoided, remedied or mitigated to be minor or less than minor in nature. The key potential adverse effects are described below, along with a statement about the significance of those effects, and should be reviewed in conjunction with the supporting technical expert memorandums accompanying this application.

5.1 Positive Effects

The proposal will generate positive effects by making a substantial contribution to housing supply and development capacity within the south-west Christchurch growth area. The economic assessment accompanying this referral application identifies that feasible greenfield residential capacity within Christchurch is constrained, particularly in areas such as Halswell where demand for standalone housing remains strong. By enabling additional residential development capacity contiguous with the existing urban area, the proposal will assist in maintaining housing supply and supporting competitive land and development markets. The development will also generate economic benefits during the construction and build phases, including employment opportunities and increased regional economic activity. In addition, the proposal enables the efficient extension and utilisation of existing infrastructure networks in the Halswell area, supporting coordinated urban growth and contributing to a well-functioning urban environment.

Environmental benefits will also arise through the protection and enhancement of the Knights Stream corridor. The proposal incorporates riparian setbacks, restoration planting and integration of the stream within open space and walkway corridors. These measures will improve riparian habitat, enhance ecological connectivity and strengthen the role of the stream as a landscape and ecological feature within the site, resulting in improved ecological outcomes relative to the existing pastoral land use baseline.

5.2 Ecological Effects

An Ecological Assessment prepared by Aquatic Ecology Ltd (**Attachment 8**) has been provided in support of this application. The assessment evaluates the existing ecological values of the site and the potential effects associated with the proposed development, as well as identifying opportunities for mitigation and ecological enhancement.

The assessment confirms that the application site does not contain any wetland ecosystems. Existing land use is predominantly agricultural, with pastoral grassland forming the dominant vegetation cover. As a result, the baseline terrestrial ecological values within the development footprint are generally low. Notwithstanding this, small patches of dryland native vegetation were identified, most notably along the western bank of Knights Stream adjacent to the eastern boundary of the site.

Knights Stream represents the primary ecological feature associated with the site. While the aquatic habitat within this reach is ephemeral, the riparian corridor provides an opportunity for ecological enhancement. The proposed development incorporates a minimum 6m setback from the stream margins, allowing for riparian restoration and protection of the stream environment. The ecological assessment recommends enhancing the riparian corridor through the establishment of native vegetation to improve habitat values and create a functional bird flyway. Recommended species include tussock sedge (pūrei), harakeke (flax), kōwhai and cabbage trees. The use of woollen Dagmat™ ground matting is recommended to assist plant establishment by retaining soil moisture and suppressing weed growth, together with removal of existing weeds and competitive exotic vegetation.

During the ecological survey, several native bird species typical of pastoral landscapes were recorded, although no threatened or uncommon species were identified within the development footprint. The assessment concludes that the proposed development provides an opportunity to enhance existing habitat values and reduce ecological fragmentation through appropriate planting and landscape design.

Existing native vegetation within the Knights Stream riparian corridor and the northern vegetated corridor will be retained and incorporated into the landscape framework for the development. Retention and enhancement of these areas will improve habitat availability and dispersal opportunities for native birds and flighted macroinvertebrates.

Opportunities also exist to enhance ecological connectivity across the site. Extending and linking native vegetation corridors along internal roads and open space areas, including connections from John Paterson Drive, would create canopy pathways across the development area. These corridors could link existing vegetation within the site to well-treed properties along Busch Lane to the west, strengthening ecological connectivity and supporting movement of bird species through the area.

Connectivity to the north and south of the site is currently constrained by surrounding residential and industrial development. In contrast, the vegetated upper reaches of Knights Stream to the east provide the most apparent ecological linkage within the surrounding landscape. Increasing connectivity between native habitat patches is expected to support improved ecological functioning and biodiversity over time. A diverse assemblage of native trees and shrubs will provide habitat and food resources for a wider range of bird species. While current bird activity is largely associated with open grassland environments, linking existing copses with semi-mature native plantings is expected to encourage colonisation by bush bird species over time.

Overall, the ecological effects of the proposed development are assessed as less than minor. Through retention of existing vegetation, implementation of riparian setbacks, restoration planting and improved ecological connectivity, the proposal provides potential for positive long-term ecological outcomes relative to the existing pastoral baseline. Further refinement of mitigation and enhancement measures can be undertaken through preparation of detailed landscape and development plans at the subdivision stage.

5.3 Cultural Effects

Engagement has been undertaken with mana whenua representatives to inform identification of cultural values and potential effects associated with the proposal. This has included engagement with Mahaanui Kurataiao Ltd, receipt of an overarching response from Te Rūnanga o Ngāi Tahu, and pre-application engagement with Whitiara. The feedback received emphasises the importance of protecting and enhancing freshwater values and recognising ki uta ki tai connectivity, given Opoira / Knights Stream is within and adjacent to the development area and forms part of the wider catchment connecting to the Hurutini (Halswell River) and ultimately Te Waihora.

Key matters raised

The key cultural matters identified through feedback include:

- Freshwater values, ki uta ki tai, and mahinga kai: The development should recognise the cultural importance of surface waterbodies (including downstream connections) and protect and enhance freshwater health (mauri), habitat values, and mahinga kai outcomes.
- Protection of waterway margins (setbacks, planting, and permanence): Waterway margins should be protected through appropriate setbacks/buffers and indigenous riparian planting. The mechanism to protect waterway margins (including long-term protection from future encroachment) should be confirmed through design and appropriate legal protections (e.g., reserve, consent notice, covenant, or another instrument as appropriate).
- Stormwater and construction-phase effects: Stormwater should be managed using water-sensitive / low-impact approaches that prioritise treatment at source and prior to discharge (including first flush and contaminant treatment where relevant). Earthworks management should avoid sediment-laden run-off and contaminants entering waterways and appropriately manage dust nuisance.
- Wastewater servicing: Wastewater servicing should be reliable and appropriately designed/reticulated, with clear integration to the wider network and avoidance of adverse effects on water.
- Ecology – fish/invertebrates, indigenous biodiversity, and taonga species: The proposal should address protection of aquatic habitat (including fish passage where relevant) and consider whether fish are present in affected watercourses/drains and how any construction effects will be managed. Indigenous/taonga flora and fauna values should be identified (through appropriate surveys where required) and protected/enhanced, including through indigenous planting throughout reserves, swales, stormwater areas and streets (using locally appropriate species and, where practicable, locally eco-sourced plants).
- Springs/wetlands and groundwater interactions: The presence of any springs/waipuna and wetlands should be confirmed and, if present, protected and incorporated into design (including naturalisation/planting and avoidance of capping or modification unless appropriately authorised).
- Accidental discovery and cultural material: An Accidental Discovery Protocol (ADP) should be in place for earthworks to manage any accidental discovery of Māori artefacts, kōiwi, and sites of significance, in accordance with tikanga and statutory processes.

Potential cultural effects, including those on freshwater values, can be appropriately managed and, in some respects, enhanced through the proposed development. This will be achieved through incorporation of measures such as riparian setbacks and planting, restoration and enhancement of stream margins, and

integrated stormwater management systems designed to improve water quality prior to discharge. The proposed building setbacks and reserve areas along Knights Stream provide an opportunity to protect sensitive margins and support ecological and cultural outcomes.

In addition, the design of open space and landscape areas provides an opportunity to incorporate culturally responsive design elements, including the expression of mana whenua values, narratives and identity within the development. Ongoing engagement with mana whenua is proposed through the detailed design and substantive phase to ensure that these outcomes are appropriately developed and implemented.

Overall, subject to continued engagement and the incorporation of the above measures, the proposal is considered capable of recognising and providing for cultural values associated with the site. The effects on cultural values are not expected to be significant and can be addressed through detailed design as part of the substantive phase, with potential for positive outcomes where the development enables enhancement of freshwater margins and culturally responsive place-making.

5.4 Noise Effects

A noise design memo has been prepared by Powell Fenwick in **Attachment 9** which assesses road traffic noise exposure for the proposed development of the application site for residential use. The memo provides a high-level summary of their measurement and modelling outcomes and provides comment on the suitability of the current noise environment for residential activities and any potential mitigation measures required to reduce road traffic noise exposure.

The application site is located adjacent to the Christchurch Southern Motorway (State Highway 76) as well as Halswell Junction Rd and Springs Rd (major and minor arterial roads within the CDP) and is subject to elevated road traffic noise. There is an existing bund approximately 2.5m high which extends along the northern portion of the application site adjacent to the Christchurch Southern Motorway. The bund stops short at the cycle path that runs adjacent to Springs Rd.

In addition to the existing bund, Powell Fenwick have included additional screening extending from the end of the existing bund to the edge of John Patterson Drive (Figure 6). They recommend that this screen extends to the same height above ground as the existing bund and should either be a solid timber paling fence, an earthen bund or a combination. This additional screening is required to block line of sight between the motorway and the northern portion of the site to reduce road traffic noise exposure.



Figure 6: Proposed additional screening

The assessment considers that the reverse sensitivity effects on the proposed subdivision can be adequately controlled with appropriate mitigation and the proposed residential use is appropriate with regards to reverse sensitivity noise effects from existing road traffic. The assessment recommends that any new residential units established within the application site which are within 100m of SH76, or within 40m of an arterial road (Springs Rd) will need to be individually assessed for internal noise exposure to habitable spaces in accordance with Rule 6.1.7.2.1 of the CDP. Based on the assessed noise exposure, it will be feasible to achieve the internal design sound levels of the rule with typical residential constructions without enhancements. Mechanical ventilation may be required to some habitable spaces most exposed to road traffic noise due to the requirement to include a +3 dB factor to address future noise as per Rule 6.1.7.2.1.

With the recommended additional screening and compliance with the CDP internal noise criteria (including project-specific assessment for future residential units within the relevant setbacks and any required mechanical ventilation), reverse sensitivity noise effects on future residents are assessed as less than minor and capable of being appropriately managed through design at the substantive stage.

5.5 Landscape and Visual Effects

A landscape and visual impact assessment has been prepared by DCM Urban Design Limited (**Attachment 10**). The report assesses the potential landscape and visual effects relating to proposed fast track referral application.

Overall, from a landscape perspective, the proposal is considered appropriate and fitting in the context of the receiving environment. Potential (adverse) effects on landscape character and values have been assessed as Low, as the application site is positioned in a location which already demonstrates a varied character, and where a major traffic corridor, residential development, productive farmland, remnant pasture and lifestyle properties coexist. The additional residential living and built form enabled by the proposal is expected to form a cohesive and well-reasoned extension to Halswell, without meaningfully detracting from the local landscape.

The application site is generally well-contained by established screening from external viewpoints and where required is appropriately designed regarding boundary treatments to lessen visual impacts on neighbouring properties. The inconsistent aesthetic of the receiving landscape and transient nature of several key viewer groups, further function to reduce potential adverse visual outcomes. The nature of the proposal will not affect the larger landscape backdrop to the southeast, formed by the Port Hills. In terms of visual amenity, possible (adverse) effects regarding the proposed plan change and subsequent future development have therefore been assessed within the landscape and visual impact assessment to range from Very Low to Low. Consequently, in terms of landscape and visual effects, there are not considered to be significant and can be appropriately mitigated as part of the substantive fast-track approvals process.

5.6 Character and Amenity Effects

An Urban Design Assessment has been prepared by DCM Urban Design Limited (**Attachment 11**). This assessment assesses the potential urban design effects from the design and development of the application site.

Layout, Connectivity and Integration: The proposed indicative scheme layout provides a coherent and permeable street network that integrates with the surrounding transport system and anticipated future growth areas. Multiple access points, including a new connection to Richmond Avenue and the retention of access via John Paterson Drive, ensure strong integration with the existing network and distribute traffic

efficiently. The development also incorporates connections for pedestrians and cyclists to surrounding streets, open space networks and future development areas. This includes links to Springs Road, Tongariro Street and areas to the south, supporting a high level of accessibility and promoting active transport choices. Overall, the proposal will not result in adverse effects in terms of connectivity or integration. Rather, it will improve local accessibility and contribute positively to the wider movement network.

Urban Structure and Legibility: The proposed internal roading network is designed as a legible hierarchy of local streets, with a slow-speed environment and clear connections to key access points. The inclusion of features such as potential intersection treatments and traffic calming will reinforce legibility and support a safe and intuitive street environment. The layout also allows for logical staging and future connections to adjoining land, ensuring the development can integrate with longer-term urban growth patterns.

Public Realm and Amenity: The proposal provides for a high-quality public realm through:

- Footpaths on both sides of streets;
- Opportunities for street trees and landscaping; and
- Integration with nearby open space and stream corridors.

The proximity to Knights Stream and associated open space corridors provides an opportunity to establish strong amenity values and a sense of place, while also maintaining appropriate setbacks and responding to natural features. No significant adverse urban design effects are anticipated in relation to amenity. Instead, the development will create a well-functioning residential environment with attractive and usable public spaces.

Built Form and Character: While detailed architectural design will be addressed at the substantive stage, the proposed scheme plan and anticipated density (approximately 15 lots per hectare) are consistent with surrounding suburban development patterns. This density supports an efficient use of land while maintaining a suburban character that is compatible with adjacent residential areas. The proposal will therefore not result in adverse effects in terms of built form or character.

Response to Site Constraints: The urban design has appropriately responded to physical constraints of the site, including:

- The presence of Knights Stream along the southern boundary; and
- Underlying ground conditions, including areas subject to potential liquefaction and lateral spreading.

These constraints will be managed through setbacks, infrastructure design and further detailed assessment at later stages. Accordingly, no adverse urban design effects arise from the site's physical characteristics.

Summary: The proposed development demonstrates a well-considered urban design response that:

- Integrates effectively with the surrounding environment;
- Provides strong connectivity for all transport modes;
- Delivers a legible and functional street network; and
- Creates a high-quality residential environment.

With the proposed coherent street network, active mode connections, and integration with open space/stream corridors (and subject to detailed design at the substantive stage), effects on character and amenity are assessed as less than minor, with positive amenity outcomes anticipated from the public realm and open space structure. Consequently, any character and amenity effects are not considered to be

significant and can be appropriately mitigated through detailed design as part of the substantive fast-track approvals process.

5.7 Infrastructure and Servicing Effects

Details of the proposed infrastructure services such as stormwater wastewater, water supply and utilities are outlined above and further detailed within the Infrastructure Report (**Attachment 6**) from DLS.

Water Supply:

- The site can be serviced via connections to existing water infrastructure at Richmond Avenue/John Paterson Drive, with additional connections to the trunk main network (including the 560mm main linked to Wilmers Road Reservoir). Some local upgrades may be required, but overall water supply capacity is sufficient and not a constraint to development.

Wastewater:

- Wastewater can connect to the existing Christchurch network at Tongariro/Harz Streets, which has capacity for the proposed development. A new on-site pump station will be required to convey flows under Knights Stream. While some downstream upgrades (e.g. pump station PS115) are anticipated, wastewater servicing is feasible and not a constraint.

Stormwater and Flooding:

- Stormwater will be managed on site through an integrated system including basins, wetlands, and treatment devices, with discharge to Knights Stream. Overland flow paths will be maintained, and flood risks managed through design. Stormwater infrastructure will meet CCC and catchment plan requirements and is not a constraint to development.

Power and Telecommunications

- All cables will be placed underground, and all kiosks will be constructed on separate individual lots. The Infrastructure Report concludes that both Power and Telecommunications are expected to be made available and will not be an inhibitor for development of this land.

Summary

Based on the Infrastructure Report (DLS) and the ability to service the development via connections to existing networks (with any identified upgrades addressed through detailed design and delivery), infrastructure and servicing effects are assessed as less than minor, and infrastructure provision is not expected to be a constraint to development. Consequently, any infrastructure and servicing effects are not considered to be significant and can be appropriately assessed and mitigated through detailed design as part of the substantive fast-track approvals process.

5.8 Construction Effects

Contaminated Land

As outlined in the PSI (**Attachment 7**) there are some potential sources of onsite contamination which are subject to further investigations. A detailed site investigation (DSI) which is currently being prepared. Notwithstanding this, it is considered that any contamination can be mitigated through remediation prior to earthworks commencing on site through the implementation of a SMP.

Earthworks

Earthworks will be undertaken on the application site to ensure that all future sites will drain towards the proposed new internal roads at a grade of at least 1/300. The expected volume of earthworks is estimated at 114,000m³. All topsoil on site will be stripped, stockpiled and replaced on the land immediately following bulk earthworks. All disturbed topsoil will be re-sown with Council specification grass seed mixes. The application site earthworks will be balanced to ensure all cut materials will be used as fill on site. The main areas of cut on the site will be for the stormwater facilities to the south of the site and the dig out of the pavements. Further cutting of the site will be required on site for the trenches to install the sanitary sewer and stormwater pipes. This cut will be used on site to elevate the house sites above the 1 in 200yr flood event. Sediment runoff within the application site will be controlled through an erosion and sediment control plan and based on the Environment Canterbury Guidelines. The stormwater discharge during construction will be undertaken either under CCC's overall discharge consent or in accordance with Land and Water Regional Plan rules. All bulk earthfill will be compacted in accordance with NZS 4431:2022. All fill testing will be carried out by an independent laboratory.

Earthworks for the project will be undertaken in accordance with best practice appropriate erosion and sediment control measures to ensure potential adverse effects are avoided or minimised.

Dust

During construction, it is anticipated that there will be dust generated by the earthworks and land disturbance, which can be mitigated and managed via an Erosion and Sediment Control Plan.

Construction Noise & Vibration

During construction, noise and vibration is anticipated to occur because of the works proposed to be carried out on the site. Construction will be managed in accordance with the NZS 6803:1999 Acoustics – Construction Noise and German Standard DIN 4150-3:1999 Structural vibration – Effects of vibration on structures. Construction noise and vibration will be managed in accordance with the ESCP which will outline measures, such as restrictions on hours of operation and use of quieter machinery (among others) to ensure that potential construction noise effects of the project are appropriately managed.

Construction Traffic

Construction of the proposed development will generate temporary construction traffic associated with earthworks, infrastructure installation and building works. Construction vehicles are anticipated to access the site via Richmond Avenue and John Paterson Drive, which provide the primary connections to the surrounding transport network. The high-level transport assessment identifies that Richmond Avenue currently carries approximately 2,500 vehicles per day, including around 8–9% heavy vehicles, and that the surrounding network has sufficient capacity to accommodate traffic associated with the development.

Construction traffic effects will be temporary and can be managed through the preparation and implementation of a Construction Traffic Management Plan (CTMP), if required. A CTMP would outline measures such as anticipated truck movements, designated access routes, and management of peak construction activities to minimise disruption to the surrounding transport network. Given the scale of the surrounding road network and the temporary nature of construction traffic, any adverse effects are expected to be appropriately managed.

Infrastructure & Servicing

DLS have prepared an Infrastructure Report with accompanying drawings, appended to the referral application, that demonstrate that the proposal can be appropriately serviced, hence there is not considered to be any significant adverse effects in relation to infrastructure and servicing during the construction period.

Summary

In summary, any potential adverse effects relating to the construction phase is not considered to be significant and can be appropriately managed.

5.9 Transportation Effects

Abley have prepared a transportation assessment (**Attachment 5**), appended to the referral application, that details the transportation approach and how the development of the sites can integrate with the wider transport network. The design of the proposed transport corridors prioritises safety and emission reduction to ensure alignment with national and regional transport planning documents.

Vehicle Access Assessment

Access to the application site is currently provided via John Paterson Drive, a long cul-de-sac. Future access will continue to be from John Paterson Drive, with an additional new primary connection proposed directly to Richmond Avenue, located approximately midway between the Halswell Junction roundabout and the John Paterson Drive/Richmond Avenue intersection. Available sight distances at this location have been reviewed by Abley, and the minimum required distances can be achieved, making this a suitable and attractive primary access point, particularly for lots in the northern part of the site. Traffic from the central and southern areas of the site will continue to access the wider network via John Paterson Drive and the existing John Paterson Drive/Richmond Avenue intersection.

Direct access to Springs Road is not achievable due to its elevated position as a motorway flyover along the northern boundary of the site. The site is bounded by Knights Stream to the south and southeast, Springs Road to the north (grade separated), and undeveloped rural land to the west. As a result, current access to the wider network is limited to the east. However, future road connections are proposed to the southwest to enable connectivity for all transport modes, with eventual connections to Marshs Road and Springs Road to support anticipated greenfield development to the west.

Intersection upgrades may be required on Richmond Avenue, and a roundabout is anticipated at the existing bend in John Paterson Drive. All new roads and associated streetlighting will be constructed to Christchurch City Council (CCC) standards, and existing roads will be upgraded to full urban standard.

Walk / Cycle Assessment

Abley's assessment identifies that existing provision for walking and cycling in the wider area is of a high standard within this part of the city as it includes on-road cycle lanes along Halswell Junction Road and the Little River Link major cycleway running past the northern boundary of the application site, providing a direct connection to the Christchurch CBD. In addition, shared pedestrian and cycle paths are located to the north and east of the application site, linking to surrounding residential areas. A site visit also confirmed the presence of shared paths further south along Richmond Avenue that are not currently reflected on the Council's published cycle network map, indicating that active transport provision in the area is more extensive than formally documented.

Pedestrian and cycle connections will be integrated throughout the site, including links to the north and east across Knights Stream, providing safe and convenient routes to Knights Stream School and nearby playing fields. A key cycle connection will be maintained from the northern end of John Paterson Drive to the motorway cycleway and the regional route to Prebbleton, representing an important link to the wider regional cycle network. Footpaths are proposed on both sides of all new internal roads, and a low-speed environment is recommended by Abley to support safe cycling.

Public Transport Assessment

The nearest public transport service (Route 7: Halswell to Queenspark) currently terminates on Richmond Avenue, south of Killarney Avenue, approximately 400m from the edge of the application site at the intersection of Richmond Avenue and John Paterson Drive. Pedestrian connections to Tongariro Street are also proposed, which will reduce walking distance and travel time to existing bus stops. The current service operates as a high-frequency route, with weekday peak and off-peak services every 10 minutes and weekend services every 15 minutes.

Abley recommends that the route be extended to provide a pair of bus stops with associated infrastructure adjacent to the Richmond Avenue/John Paterson Drive intersection, thereby improving public transport accessibility to the application site. During a site visit, it was observed that northbound buses continue past the site and use the Halswell Junction Road roundabout to undertake a U-turn before travelling back past the site. As such, extending the service to this intersection would not result in any meaningful additional travel time or distance for the existing route.

As development of the site progresses, the service could potentially be extended into the application site, enabling buses to loop through the internal road network. It is recommended that road cross-sections are designed to accommodate bus manoeuvring and that space be safeguarded for potential future bus stops along John Paterson Drive within the site, should they be required.

Overall, the site is well positioned to be effectively served by public transport, with practical opportunities available to enhance accessibility both in the short and longer term.

Internal Rooding Assessment

The proposed internal rooding layout is shown in the draft scheme plan (**Attachment 1**). While the design will be further refined as the application progresses, Abley's high-level transport assessment anticipates the following key features.

- All internal roads are expected to be classified as local roads, providing connections to Richmond Avenue (currently a local road) and Halswell Junction Road, which is identified as a Major Arterial in the CDP.
- The internal road network is intended to operate as a low-speed environment, with posted speed limits not exceeding 50 km/h. There is potential to introduce traffic calming measures and implement 30 km/h speed environments on selected links where cycling is encouraged. Lower operating speeds will also support appropriate sight distances at intersections and enhance overall safety.
- Internal intersections are anticipated to be generally controlled by priority control. A mini roundabout may be incorporated at the intersection of John Paterson Drive and the primary north-south internal road (at the existing bend in the John Paterson Drive corridor) to manage vehicle conflicts and moderate speeds. The design would also enable appropriate pedestrian crossing facilities to be integrated where required.
- Pedestrian and cycle connections, both within and beyond the site, will maintain strong connectivity with surrounding areas. Links are proposed to the north, east and south, as well as to potential future development to the west, ensuring permeability for all modes.
- Provision will also be made to safeguard space for potential future bus stops within the site, thereby futureproofing a possible extension of the Route 7 Halswell to Queenspark service. These stops are recommended to be identified indicatively within the development plan.

Based on the review of the proposed draft scheme plan and acknowledging that further detail will be provided at the substantive assessment stage, the internal road network is considered capable of complying with the relevant transport provisions of the CDP and achieving the associated objectives and policies.

Traffic Generation Assessment

The proposed redevelopment of the application site is anticipated at a proposed residential density of 15 households per hectare, and therefore a trip rate in the low-medium range is anticipated. A representative trip rate of 0.7 trips per household has been assumed by Abley, equating to 344 two-way trips in peak hour which would access the wider network via Richmond Ave. This corresponds to one vehicle movement every 10-11 seconds and is split across two accesses (the direct connection to Richmond Ave and via the John Paterson Drive / Richmond Ave intersection). As such each connection will accommodate one vehicle movement every 20-22 seconds or three vehicles per minute.

Local and Wider Network Effects

Based on existing traffic volumes on Richmond Avenue and the anticipated traffic generation of the site, both the current priority-controlled intersection at Richmond Avenue/John Paterson Drive and a proposed new connection of similar standard are expected to operate safely, with good levels of service and minimal delays for vehicles exiting the site. This will be confirmed through detailed traffic modelling at a later stage.

It is anticipated that a significant proportion of site traffic will travel north along Richmond Avenue toward the Halswell Junction Road roundabouts to access the wider network. A detailed assessment of traffic

distribution and wider network effects is proposed using the Christchurch Transport Model (CTM), supplemented by SIDRA intersection analysis where required. This will enable confirmation of any necessary off-site infrastructure upgrades.

A high-level review of the Halswell Junction Road/CSM2 (SH76) off-ramp/Richmond Avenue roundabout indicates that current peak hour delays are modest, with the worst-performing approaches operating around the Level of Service (LoS) C/D threshold and average delays of approximately 35 seconds. These conditions are considered acceptable within an urban arterial context, and the intersection is assessed as having sufficient spare capacity to accommodate traffic generated by the development.

The Halswell Junction Road/Springs Road roundabout also plays an important role in the network and currently experiences some peak period delays, which are managed through traffic signals controlling the northbound approach. Preliminary CAST model outputs (forecast to 2028) indicate that approximately two-thirds of development traffic is likely to travel north toward the Christchurch Southern Motorway, with the remainder travelling south. While detailed validation has not yet been undertaken, the additional traffic associated with the development is anticipated to represent a small component of overall cumulative growth in the area.

A comprehensive modelling assessment will be undertaken as part of a substantive application; however, at this stage, the transport effects of the development are expected to be relatively minor within the context of anticipated wider network growth.

Transport Infrastructure Requirements

No specific roading upgrades or intersection improvements are required to support this proposal. The only external infrastructure which is recommended for consideration is the installation of bus stops and associated infrastructure (seats) in vicinity of the Richmond Ave / John Paterson Drive; however this would be under the jurisdiction of CCC.

Future Assessment and Traffic Modelling Approach

An Integrated Transportation Assessment (ITA) will be prepared as part of a substantive application. The ITA would describe the existing and future transport environment, outline the transport elements of the proposal including access and connectivity for all modes, and assess trip generation and transport effects through detailed traffic modelling. It would also assess the suitability of the proposed road and transport infrastructure against Council standards, evaluate the proposal against relevant transport policies and objectives, and identify any mitigation measures or recommended consent conditions.

A key component of the ITA will be transport modelling to forecast travel demand across different modes and assess impacts on the local and wider transport network, including consideration of potential future extensions to the Route 7 Halswell to Queenspark bus service. The modelling is expected to utilise the CAST model and SIDRA Intersection software, with the approach to be confirmed in consultation with CCC.

Based upon the preliminary transportation assessment by Abley, transport effects are not considered to be significant and can be appropriately assessed and mitigated through detailed design and any required upgrades as part of the substantive fast-track approvals process.

5.10 Geotechnical Effects

A Geotechnical Investigation Report has been prepared by LandTech Consulting and is attached to this memo as **Attachment 12**. The geotechnical investigation concludes based on their current investigation it is probable that the site will be classified as TC2 for development purposes. However, additional deep testing would be required. On account of the shallow dense gravel and lack of liquefaction mapped through the site during the CES there is potential for portions of the site to be classified as TC1. However, this would require several 15.0m deep boreholes to assess the liquefiable nature of the soil profile below our current depths of testing in selected areas.

Future residential unit foundation options would most likely comprise TC1 or TC2 waffle slabs supported via the natural underlying soils or engineered fill if site levelling is required at the subdivision development stage. Further detailed analysis will be required to determine appropriate setback distances from Knights Stream and will be provided as part of the substantive application.

Based upon the preliminary geotechnical assessment by LandTech Consulting, geotechnical effects are not considered to be significant and can be appropriately assessed and mitigated through detailed design as part of the substantive fast-track approvals process.

5.11 Effects on Greenhouse Gas Emissions

The proposal supports emissions reduction outcomes by enabling housing in a location contiguous with existing urban development (reducing the need for dispersed rural residential patterns), and by enabling walking and cycling connections through the site. During construction, emissions can be minimised through efficient staging, reduced rehandling of materials where practicable, and good construction management practices. Over time, riparian and landscape planting will contribute to local climate resilience and modest carbon sequestration benefits.

The proposal is expected to have less than minor adverse greenhouse gas effects overall, with potential positive contributions through enabling housing contiguous with the existing urban area and supporting mode shift (walking/cycling and future public transport improvements). Construction emissions will be temporary and can be minimised through standard good practice construction management.

5.12 Mitigation Measures

Mitigation measures will be embedded through detailed design and, where appropriate, conditions of consent. Key mitigation tools will include a DSI (and remediation/validation as required) to address contaminated land risks under the NES-CS; an ESCP to manage earthworks, dewatering management plan; a traffic management plan to manage construction traffic; riparian setbacks and open space corridors to protect waterways and maintain ecological function; fish-passable design for any required culverts/crossings; and ecological management measures (including lizard survey/salvage procedures and Wildlife Act approvals where required). Collectively, these measures ensure adverse effects are appropriately avoided, remedied or mitigated and that residual effects are minor or less than minor.

The proposal includes mitigation measures to avoid, remedy, or mitigate potential adverse effects on landscape character and visual amenity as perceived from the application site's surroundings.

MM1 – Bund and Landscape Buffer Along Springs Road Interface

A 12m wide, 2m high bund with 1 in 3m slopes is proposed along the Springs Road boundary. The bund will be planted on the outer slope, with a 1.8m high acoustic fence along the crest and a 1m wide planting strip along the internal lot boundary. This treatment will continue the visual character of the existing bund along the Christchurch Southern Motorway (SH76), screen domestic activity from the shared path along this edge and partially screen views from Springs Road and the motorway. It will also improve amenity for future residents by reducing views of adjacent transport infrastructure and creating a greater sense of enclosure.

MM2 – Green Links and Reserves

Future subdivision will include green links, a recreation reserve, and a stormwater management area with wetlands. While enabling higher residential density, these features will provide spatial relief, reduce the dominance of built form, and support ecological values and natural processes on the site.

MM3 – 1.8m High Close-boarded Fence Along Boundary Shared with Busch Lane Properties

A 1.8m high close-boarded fence is proposed along the boundary shared with Busch Lane properties. This will clearly define the new residential edge and provide immediate screening, mitigating privacy and outlook effects on neighbouring residents. While the planting will primarily benefit future residents within the site, maturing vegetation will soften the appearance of the fence over time. Existing shelterbelt plantings along Busch Lane, together with the substantial setback of existing dwellings (approximately 50–70 m), will also help reduce visual and landscape effects.

MM4 – Knight Stream Walkway

A formalised walkway is proposed along Knights Stream within the site, which is currently publicly inaccessible. This will increase openness, enable riparian restoration along the stream corridor, and reinforce the waterway as a key landscape feature. The walkway will also provide a buffer between residential development and the stream, helping to prevent domestic encroachment while supporting ecological and community benefits.

MM5 – Open Frontages Towards Green Spaces

Future development will incorporate 1.2m high open-style fencing or gates where residential lots adjoin green spaces, including reserves, green links, stormwater management areas, wetlands, and the Knights Stream walkway. This permeable boundary treatment will maintain openness and soften the built edge by allowing views of greenery and avoiding continuous solid fencing. Similar treatments are used in recent Halswell subdivisions and will help ensure visual consistency with surrounding residential development.

MM6 – Open Frontage Towards John Paterson Drive

Future development will incorporate 1.5m high open-style fencing with a 1m planting strip along the road boundary with John Paterson Drive. This treatment will reinforce integration with the existing Knights Stream subdivision and avoid creating another inward-facing edge defined by solid fencing. The more open frontage will soften the visual impact of the residential expansion while clearly defining private space and improving amenity along the street.

6.0 Statutory Planning Framework

This section is provided in accordance with Clause 2(1)(a)(i) – (iii) of Schedule 5 of the FTAA. This requires that applications include an assessment of the activity against:

- (a) any relevant national policy statements; and
- (b) any relevant national environmental standards; and
- (c) If relevant, the New Zealand Coastal Policy Statement.

6.1 National Policy Statements

6.1.1 National Policy Statement for Natural Hazards 2025

The National Policy Statement for Natural Hazards ('NPS-NH') applies to flooding, landslip, coastal erosion, coastal inundation, active faults, liquefaction, and tsunami natural hazards. The NPS-NH seeks to manage natural hazard risk associated with subdivision use and development to people and property using a risk-based proportionate approach, with the risk level being assessed using the NPS-NH risk matrix.

The site comprises approximately 37.7ha of generally flat land centred on John Paterson Drive in Halswell. A preliminary geotechnical investigation has been completed by LandTech Ltd (**Attachment 12**), along with an Infrastructure Report which has been prepared by DLS (**Attachment 6**). These reports form part of the technical basis for this assessment.

Flooding

The Infrastructure Report confirms the site is not affected by any Flood Management Areas as defined by the CDP which is an important consideration under the NPS-NH framework. Stormwater will ultimately discharge to Knights Stream and then to the Halswell River under CCC's global consent. The proposal includes:

- First flush basin (four-day detention time);
- Wetland treatment prior to discharge;
- Secondary detention basin for exceedance flows; and
- Design in accordance with CCC WWDG and the Huritini Halswell Stormwater Management Plan.

The Infrastructure Report concludes that stormwater can be dealt with on site and will not be an inhibitor for development of this land. In NPS-NH terms, flood risk is low to moderate and is avoided or mitigated through engineered design and finished floor level controls.

Earthworks will ensure that sites drain toward roads at a minimum grade of 1:300. Importantly, fill from trenching and other cuts will be used to elevate the house sites above the 1 in 200yr flood event. This provides direct mitigation consistent with Policy 6 of the NPS-NH (management of flood risk for new subdivision).

The report identifies two sources of potential inflow which are the motorway stormwater basins to the northeast as well as a major flow channel from 15 Busch Lane to the south. These inflows will be maintained as part of development, with basin flows restricted to the future road network and Busch Lane flows directed into a future stormwater reserve. This demonstrates that overland flow paths are recognised and incorporated into the subdivision layout rather than obstructed.

Liquefaction and Seismic Settlement

The application site is subject to the LMA within the CDP and is underlain by Holocene alluvial deposits (as described in the geotechnical report) and has been assessed for liquefaction susceptibility. The geotechnical investigation concludes that:

- Little to no land damage is expected in Serviceability Limit State (SLS) events;
- Minor liquefaction-induced settlement may occur in Ultimate Limit State (ULS) events;
- Most of the site aligns with TC1 criteria, with some eastern areas potentially TC2 (subject to further testing); and
- TC1/TC2 foundation solutions (e.g., waffle slabs) are appropriate.

These effects are well understood within the Christchurch context and are routinely managed via engineered foundation design. Under the NPS-NH risk matrix, liquefaction risk is not intolerable but is manageable through standard mitigation measures at subdivision and building consent stages.

Lateral Spreading

Given proximity to Knights Stream along the southeast boundary, some localised lateral spreading risk may exist in areas closest to the stream. The proposal includes a riparian margin and a stormwater facility adjacent to Knights Stream. Setbacks and further detailed geotechnical assessment at substantive stage will confirm final buildable areas. With these controls, lateral spreading risk can be appropriately managed.

Infrastructure Resilience and Hazard Management

The Infrastructure Report demonstrates that dual road access will be provided (John Paterson Drive and Richmond Avenue). Furthermore, stormwater will be treated and detained prior to discharge helping with managing any potential flooding effects. Onsite earthworks will be balanced and compacted to NZS 4431:2022. The proposed volume of bulk earthworks is estimated to be approximately 114,000m³ which is in line with other residential development projects within Christchurch. The integration of elevated building platforms above the 1 in 200-year flood event, onsite detention and treatment, controlled overland flow paths, and riparian margins demonstrates that hazard management is embedded within the infrastructure design for the application site.

Overall NPS-NH Conclusion

The attached geotechnical and infrastructure assessments demonstrate that:

- The application site is not within a mapped FMA within the CDP.
- External flood inflows are identified and can be accommodated.
- Building platforms will be elevated above the 1 in 200-year flood event.
- Stormwater will be treated and detained prior to discharge.
- Liquefaction risk is low to moderate and manageable through TC1/TC2 foundation solutions.
- Landslip, rockfall, coastal hazards and active faults are not present.

Under the NPS-NH risk matrix, the identified hazards are low to moderate and capable of being avoided or mitigated through engineering design.

Based on the assessment above, it is considered that the project is consistent with the NPS-NH.

6.1.2 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 ('NPS-FM') requires that freshwater is managed in a way that gives effect to Te Mana o te Wai, which establishes a hierarchy of obligations that prioritises:

- (1) The health and well-being of water bodies and freshwater ecosystems;
- (2) The health needs of people (such as drinking water); and
- (3) The ability of people and communities to provide for their social, economic and cultural well-being.

It is considered that the project is consistent with the relevant policies of the NPS-FM that relate to land development for the following reasons:

- The proposal provides opportunities for riparian restoration and ecological enhancement, improving freshwater quality and ecosystem health over time (Policy 5).
- Integrated stormwater management avoids adverse effects on freshwater and manages contaminants at source (Policies 6 and 7).
- Engagement with mana whenua is ongoing to ensure freshwater values are recognised and incorporated into design (Policy 2).
- Flood management and water-sensitive design support the health and safety of people and communities (Objective – Te Mana o te Wai hierarchy).
- Monitoring and adaptive management will ensure freshwater values are maintained and not degraded (Policy 13).

Based on the assessment above, it is considered that the project is consistent with the NPS-FM.

6.1.3 National Policy Statement for Indigenous Biodiversity 2023

The National Policy Statement for Indigenous Biodiversity ('NPS-IB') ensures the protection, maintenance and restoration of New Zealand's most threatened indigenous species. It is noted that the NPS-IB came into effect, gazetted on 4 August 2023. The NPS-IB was amended in 2025 (with provision taking effect from January 2026) in relation to quarrying and mining activities.

The project is consistent with the relevant objectives and policies of the NPS-IB for the following reasons:

- The site contains limited indigenous biodiversity values and no significant habitats or wetlands, meaning there is no loss of significant indigenous biodiversity (Objective 2.1).
- Existing indigenous vegetation corridors will be retained and integrated into the development where practicable (Policy 8).
- Opportunities for ecological enhancement are provided through riparian planting and habitat restoration, particularly along the Knights Stream corridor (Policies 13 and 14).
- Ecological assessments have been undertaken to identify values and confirm the absence of Significant Natural Areas (SNAs) (Policies 3, 6 and 7).
- A precautionary approach has been applied to ensure any potential adverse effects on biodiversity are appropriately identified and managed (Policy 3).

- Engagement with iwi is ongoing, providing for tangata whenua involvement in biodiversity management and restoration outcomes (Policies 1 and 2).

The proposal is consistent with the objective and relevant policies of the NPS-IB. The site contains limited indigenous biodiversity values and no SNAs, and the development will retain existing vegetation and incorporate ecological enhancement planting. As such, the proposal will maintain and enhance indigenous biodiversity while enabling urban development consistent with the intent of the NPS-IB.

Based on the assessment above, it is considered that the project is consistent with the NPS-IB.

6.1.4 National Policy Statement on Urban Development 2020

The NPSUD came into force on 20 August 2020 and replaced the National Policy Statement on Urban Development Capacity 2016. The NPSUD includes a focus on achieving well-functioning urban environments, promoting intensification within urban environments, such as Christchurch, as a means of increasing housing supply, supporting competitive land markets and improving affordability. There is now a much greater focus on:

- Introducing and defining the concept of well-functioning urban environments with a key component being the provision of a variety of homes that meet the needs of different households in terms of type, price and location. (Objective 1 and Policy 1);
- A greater emphasis on enabling more people to live in and more business to locate in areas that are near centres, planned public transport and where there is high demand (see Objective 3);
- A greater emphasis on improving housing affordability (see Objective 2);
- A greater emphasis on robust strategic planning and the need to integrate urban development with infrastructure (see Objective 6);
- Changing the policies from providing sufficient development capacity to providing at least sufficient development capacity (see Policy 2). This is coupled with other changes that direct Councils to provide more development capacity, and replacing 'minimum targets' with 'housing bottom lines';
- Being more directive about what it means for Councils to be 'responsive' in the urban environment with respect to Plan Changes (Policy 8); and
- Ensuring New Zealand's urban environments support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change (Objective 8, Policy 1(e)).

Overall, the proposal is considered to be consistent with the NPS-UD for the following reasons:

- The development will enable approximately 501 additional residential units contiguous with the Halswell urban area, materially increasing residential development capacity in a Tier 1 urban environment and supporting competitive land markets (Policies 1 and 2).
- The site is well connected to existing transport infrastructure and will provide new internal roads and walking and cycling connections, improving accessibility and supporting sustainable transport outcomes.
- Environmental constraints, including waterways and geotechnical considerations, can be appropriately managed through subdivision design and engineering mitigation measures.
- The proposal represents a significant addition to development capacity and is therefore consistent with the responsive planning approach anticipated by Policies 6 and 8.

- Engagement with mana whenua and incorporation of cultural values into waterway and landscape design will support Policy 9.

Based on the assessment above, it is considered that the project is consistent with the NPSUD.

6.1.5 National Policy Statement for Highly Productive Land 2022

The National Policy Statement for Highly Productive Land 2022 (“NPS-HPL”) seeks to protect highly productive land for use in land-based primary production, both now and for future generations. The NPS-HPL came into effect on 17 October 2022 and has subsequently been amended in August 2024 and December 2025. The NPS-HPL sets out a process whereby the regional council is to undertake a mapping exercise and map HPL in its regional policy statement. That has not occurred, so the interim regime set out in clause 3.5(7) of the NPS-HPL applies. The interim regime requires land to be ‘zoned general rural or rural production at the (NPS) commencement date’ and ‘LUC 1, 2 or 3’. For the latter, the AgriBusiness Group assessment (**Attachment 13**) prepared for John Paterson Estates confirms that the application site contains a mix of LUC Class 1 and 2 soils as mapped by the New Zealand Resource Inventory.

For the former, it can be argued (and a FTAA Panel has reached this conclusion in a draft decision) that part of the site is not ‘zoned general rural or rural production’. If that is correct, part of the site is not HPL and the NPS-HPL does not apply to that part of the Site. If the Panel’s findings in the Pound Road decision¹ were incorrect, and the site is ‘zoned general rural or rural production’, all of the site is Highly Productive Land (HPL) and would engage the protective purpose of the NPS-HPL, as well as Policies 4, 7, 8 and 9 (in particular). This referral application therefore assesses the purpose, those policies and includes an assessment against clauses 3.8, 3.9 and 3.10 of the NPS, for all of the Site.

Notwithstanding the LUC 1 and 2 classifications in the New Zealand Resource Inventory, the AgriBusiness Group assessment identifies several limitations affecting the overall productive capacity of this land which are outlined below, before turning to the specific criteria in clause 3.10 of the NPS-HPL. First, the question of whether the CCC part of the Site meets the NPS definition of HPL is explored.

Is the Site ‘zoned General Rural or Rural production’?

The NPS-HPL refers to the general rural or rural production zones. CCC has not yet implemented the National Planning Standards, so to apply clause 3.5(7)(a)(i), you must identify what is the nearest equivalent zone in the Christchurch District Plan, to both general rural and rural production.

In the Pound Road fast-track decision², the Panel found that the CDP’s Rural Urban Fringe Zone is not the nearest equivalent to either the NPS general rural (GU) or rural production (RP) zones. The Panel considered that, while the GU and RP zones share a broad objective recognising land-based primary production, the CCC’s Rural Urban Fringe Zone’s rule framework, subdivision standards, small minimum lot sizes, anticipated non-rural activities, and limits on intensive farming show that its predominant purpose is managing rural living and peri-urban development rather than protecting land for primary production.

On that basis, the Panel in the Pound Road decision found that treating Rural Urban Fringe Zone land as highly productive land would protect a primary production opportunity that the zoning framework itself does not realistically anticipate. The Panel therefore concluded the Rural Urban Fringe Zone is not equivalent to the General Rural or Rural Production zones for the purposes of clauses 1.3(4) and 3.5(7), and that the

¹ Approved 1 May 2026.

² Pound Road Industrial Development [FTAA-2505-1057] - Record of Decision of the Expert Consenting Panel under Section 87 of the Fast-Track Approvals Act 2024, Dated 1 May 2026

Pound Road site was not highly productive land under the interim definition. This reasoning is relevant to the John Paterson Estates site, noting that part of the site is zoned Rural Urban Fringe.

In the Ryans Road fast-track decision³, the Panel agreed with CCC’s legal opinion that the nearest equivalent zone to the Rural Urban Fringe Zone is the General Rural Zone and that therefore the NPS-HPL applies. They found that the CDP’s rural zone objectives and policies consistently refer to and seek to maintain rural productive activities occurring in all rural areas, including the Rural Urban Fringe (e.g. Objective 17.2.1.1 clauses (i) and (ii), Policy 17.2.2.4(ii) and Policy 17.2.2.3(c)) and provide for a range of activities in rural zones that are largely limited to those activities which have a direct relationship with or are dependent on the rural resource and rural productive activity, or have a functional, technical or operational necessity for a rural location (Policy 17.2.2.1).

Even if the NPS-HPL were applicable, below is an assessment under Clause 3.10 of the NPS-HPL enabling the proposal to proceed.

CRC’s draft HPL maps

While the interim regime identifies the site as a mix of LUC Class 1 and 2 soils (and therefore HPL), the CRC has produced draft maps of its highly productive land in the region for the purposes of the NPS-HPL as part of its Draft Canterbury Regional Policy Statement 2024. This draft mapping does not identify the Site as “highly productive land” (Figure 7). While the transitional definition of “highly productive land” continues to apply until any such mapping is operative and noting that the CRC has placed the development of its new Regional Policy Statement on hold, it does indicate this land may not be “highly productive land” under the NPS-HPL in the future.

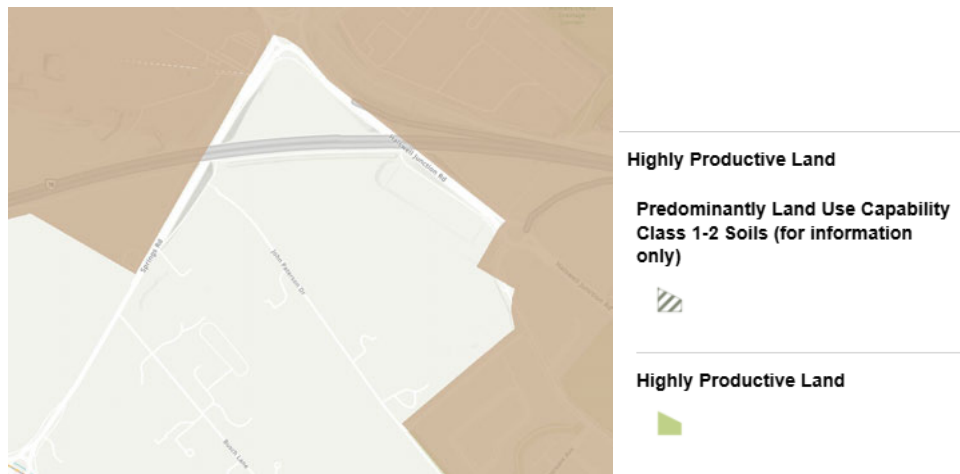


Figure 7: Highly productive land mapping within the draft CRPS

Site Constraints Affecting Economic Viability

The application site comprises approximately 37.7ha of land across nine records of title which range from approximately 3ha to approximately 6ha. The site is located on the urban fringe of Halswell, within a transitional environment between established residential areas, infrastructure corridors, and rural lifestyle properties. The site’s effective productive capacity is constrained by:

³ The Ryans Road Industrial Development FTAA 2504-1054 - Record of Decision of the Expert Consenting Panel under Section 87 of the Fast-Track Approvals Act 2024, 7 May 2026

- Its fragmented ownership and existing residential units across the site;
- Its proximity to existing and planned urban development, including the Christchurch Southern Motorway and surrounding residential areas; and
- Proximity to residential interfaces, which introduces reverse sensitivity effects (e.g. spray drift, noise, and operational impacts).

The site forms a logical extension to the existing urban area rather than a cohesive part of a wider productive rural landholding.

Irrigation Constraints

The application site does not currently benefit from an existing groundwater take, nor does it hold any resource consents that would enable irrigation. It is located within the Christchurch West–Melton Groundwater Allocation Zone, which is fully allocated. Under Rule 9.6.2 of the Canterbury Land and Water Regional Plan (CLWRP), additional allocation of groundwater within this zone is generally precluded, except in limited circumstances such as for community water supply or non-consumptive uses. As a result, the ability to obtain a new consent for irrigation purposes is effectively precluded. Furthermore, the CLWRP provides only limited scope for the transfer of existing water permits within this allocation zone, and this is restricted to specific activities such as gravel extraction and associated purposes. These provisions do not extend to irrigation use.

Accordingly, under the operative provisions of the CLWRP, there is no realistic pathway for securing irrigation water for the site, which significantly constrains its productive capacity for land-based primary production.

Integration into Larger Farming Systems

The site is not well suited to integration into a larger farming operation. It is physically and functionally separated from larger-scale rural production areas and is increasingly influenced by surrounding urban development. There are no immediately adjacent large-scale arable or pastoral operations that would enable efficient integration. In addition, access constraints and proximity to residential environments would create operational inefficiencies and potential land use conflicts.

Pastoral Grazing

While pastoral grazing (sheep and beef and dairy support) is theoretically possible, it is constrained by:

- The costs associated with intensifying land productivity, such as establishing winter crops and importing supplementary feed, are unlikely to be economically justified given the limited scale of the site.
- The absence of irrigation capability means that, in most years, soil moisture levels over the summer period would be insufficient to sustain optimal stocking rates, necessitating a reduction in livestock numbers.
- The presence of imperfectly drained soils may further constrain the suitability of the land for grazing, particularly for heavier stock during wetter winter conditions.
- The proximity of surrounding residential activities also gives rise to potential reverse sensitivity effects, including conflicts associated with noise, odour, and general farming operations such as stock movement and transport.

The NPS-HPL assessment concludes that the pastoral land use potentially achievable across the 40ha site would not generate sufficient returns to cover operating costs, including interest, taxation, and a reasonable return on management, if operated as a standalone unit. On this basis, such land use cannot be considered economically viable. Overall, it is concluded that the site is subject to permanent and long-term constraints that preclude its economic viability for land-based primary production for a period of at least 30 years.

Clause 3.10 Assessment

Clause 3.10 of the NPS-HPL provides an exemption pathway where HPL may be developed for non-primary production activities where certain tests are met.

Permanent or long-term constraints (clause 3.10(1)(a))

While the soils may have inherent productive capability, the application site is subject to enduring constraints including lack of irrigation, fragmentation, urban encroachment, and reverse sensitivity pressures. These factors significantly limit the ability to achieve economically viable primary production over the long term.

Avoidance of significant loss or fragmentation (clause 3.10(1)(b))

The application site is located on the edge of an existing urban area and is already influenced by surrounding residential and infrastructure development. Its development would not result in the fragmentation of a large, cohesive area of productive rural land, but rather represents a logical consolidation of the urban boundary.

Benefits outweigh costs (clause 3.10(1)(c))

The proposal will deliver significant benefits, including:

- Increased housing supply in an area experiencing constrained capacity, with Halswell's greenfield capacity estimated to be exhausted within approximately 3.0–3.6 years;
- Efficient use of land adjacent to existing infrastructure and urban areas; and
- Positive social and economic outcomes associated with residential development.

These benefits outweigh the limited loss of land that, while technically HPL, is not realistically capable of supporting economically viable primary production.

Overall Consistency with the NPS-HPL

While the proposal involves the urbanisation of land that may be classified as Highly Productive Land, the assessment demonstrates that:

- The application site is subject to long-term constraints that limit its productive viability;
- The loss of HPL is not significant in a district-wide context and does not result in fragmentation of a productive rural land base; and
- The environmental, social and economic benefits of development outweigh the costs associated with the loss of HPL.

Accordingly, having applied clause 3.10, the proposal is not inconsistent with the NPS-HPL.

6.1.6 National Policy Statement for Infrastructure 2025

The National Policy Statement for Infrastructure 2025 ('NPS-I') recognises the critical role of infrastructure in enabling the social, economic, cultural and environmental wellbeing of communities, both now and into the future. The John Paterson Drive proposal is consistent with this direction, providing for approximately 500 residential lots as a logical extension of the existing Halswell urban area, supported by established and planned infrastructure networks.

The proposal both utilises and delivers infrastructure. It connects to the existing transport network via Richmond Avenue and John Paterson Drive, with additional provision for future connections to surrounding growth areas, enabling a well-integrated and connected urban environment. Internal roading, active transport links, and provision for public transport integration further support accessibility and network efficiency. Three waters infrastructure, including water supply, wastewater servicing and stormwater management systems, will be delivered in a coordinated manner to service the development area.

The NPS-I promotes integrated and efficient infrastructure planning. In this regard, the proposal consolidates growth adjacent to the existing Knights Stream neighbourhood and wider Halswell urban area, avoiding fragmented or isolated development. The site is well located to leverage existing infrastructure corridors, including transport and servicing networks, thereby reducing the need for inefficient infrastructure expansion. The master planned approach enables coordinated staging, efficient servicing, and integration with surrounding urban development.

In terms of resilience and environmental management, the proposal incorporates water-sensitive urban design and integrated stormwater management, including wetlands, attenuation areas and riparian setbacks associated with Knights Stream and surrounding waterways. These measures contribute to improved environmental outcomes and support infrastructure resilience, including in response to natural hazards. While the site is subject to some liquefaction risk, geotechnical investigations confirm that this can be appropriately managed through design and engineering solutions, with development anticipated to be feasible across TC1 and TC2 foundation conditions.

Overall, the proposal recognises and provides for the functional and operational needs of infrastructure, supports efficient and integrated infrastructure delivery, and incorporates measures to ensure resilience and environmental performance. It is therefore consistent with the objectives and policy direction of the National Policy Statement for Infrastructure 2025, enabling infrastructure necessary to support urban growth and community wellbeing.

6.2 New Zealand Coastal Policy Statement

The New Zealand Coastal Policy Statement ('NZCPS') sets out a number of objectives and policies for achieving the purpose of the RMA in relation to the coastal environment of New Zealand. As the application site is not located within close vicinity to the coastal environment, it is considered that the NZCPS is not relevant to the proposal.

6.3 National Policy Statement on Electricity Transmission

The application site does not contain land that is directly impacted by the NPS on Electricity Transmission.

6.4 National Policy Statement on Renewable Electricity Generation

The application does not relate to renewable electricity generation.

6.5 National Policy Statement on Greenhouse Gas Emissions from Industrial Process Heat

The application does not involve industrial process heat.

6.6 National Environmental Standards

6.6.1 National Environmental Standards for Air Quality 2004

The Resource Management (National Environmental Standards for Air Quality) Regulations 2004 (NES-AQ) sets standards to guarantee a minimum level of health protection for people living in New Zealand. No specific consents relating to this standard are required for this project, although the relevant regulations in the NES-AQ have informed the assessment of construction and operational air quality effects. The potential for effects on air quality in relation to this project relate primarily to dust generation during the construction phase. Measures are proposed to manage potential adverse effects in response to the air quality objectives and policies. The management of dust and odour will be addressed in an Erosion and Sediment Control Plan. As such, ambient air quality will be maintained once John Paterson Estates is constructed.

6.6.2 National Environmental Standards for Freshwater 2020

The Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F) regulate activities that may adversely affect freshwater bodies, natural inland wetlands and fish passage. The application site at John Paterson Drive contains freshwater environments associated primarily with Knights Stream and associated drainage channels, together with modified waterways and artificial drains that form part of the wider Halswell catchment drainage network. These waterways reflect the spring-fed nature of the plains and provide hydrological connectivity through the site and surrounding urban catchment. The ecological assessment prepared for the proposal confirms that no natural inland wetlands are present within the application site, and the development layout has been designed to retain and protect existing waterways through riparian setbacks and open space corridors. As a result, the wetland provisions of the NES-F are not triggered.

Potential freshwater-related effects associated with the development are expected to be limited to matters such as sedimentation during earthworks, temporary bed disturbance associated with infrastructure, including potential culverts/bridges, and maintaining fish passage within modified channels. Any culverts or structures required for stormwater infrastructure or access crossings will be designed to comply with national fish passage requirements, and construction activities will be undertaken in accordance with best-practice erosion and sediment control measures to protect water quality and aquatic habitat.

On this basis, the proposal is not inconsistent with the NES-F. Any resource consent requirements associated with stream works, structures in beds, or stormwater discharges can be appropriately addressed through the detailed design and substantive consent stage.

6.6.3 National Environmental Standards for Sources of Human Drinking Water

The National Environment Standard for Sources of Human Drinking Water (NES-DW) set requirements for protecting sources of human drinking water from becoming contaminated. The NES-DW requires regional

councils to ensure that effects of activities on drinking water sources are considered in decisions on resource consents and regional plans. Specifically, regional councils are required to:

- Decline permits that are likely to result in community drinking water becoming unsafe for human consumption following existing treatment.
- Be satisfied that permitted activities in regional plans will not result in community drinking water supplies being unsafe for human consumption following existing treatment.
- Place conditions on relevant resource consents that require notification of drinking water suppliers if significant unintended events occur (e.g., spills) that may adversely affect sources of human drinking water.

Consideration will be given to the effects of the proposed bulk earthworks and any associated dewatering take and discharge against applicable regulations under the NES-DW. There are no drinking water supplies downstream of the application site that could potentially be affected by this proposal.

6.6.4 Regional and District Planning Framework

An assessment of the relevant regional and district planning documents is at **Attachment 14**.

7.0 Treaty Settlements

Section 7 of the FTAA requires all persons performing and exercising functions, powers, and duties under the Act must act in a manner that is consistent with the obligations arising under existing treaty settlements, while Section 16 sets out the requirements for the Minister.

Treaty settlements with the following iwi/groups are therefore of relevance to the project area:

- Te Rūnanaga o Ngāi Tahu

The Ngāi Tahu Claims Settlement Act 1998 is an act of parliament passed in New Zealand relating to Ngāi Tahu, the principal Māori iwi (tribe) of the South Island. The purpose of the Act is to settle all of the tribe's claims under the Treaty of Waitangi, and to record an apology to Ngāi Tahu from the Crown, in regard to past failures to protect the tribe's interests. The settlement of Ngāi Tahu's treaty claim does not directly relate to the applicant's land, but to the wider Canterbury area. The site does not involve any statutory acknowledgement areas. Notwithstanding this, any project needs to consider the protection of:

- Historic resources;
- Riparian margins;
- Water quality;
- Indigenous vegetation; and
- Taonga species

The Ngāi Tahu Claims Settlement Act 1998 includes a table of taonga species (attachment 12.148), which include.

- Ti rākau/Cabbage Tree/*Cordyline australis*
- Kāhu/Australasian harrier/*Circus approximans*
- Karoro/Black backed gull/*Larus dominicanus*

- Koparapara or Korimako/Bellbird/*Anthornis melanura melanura*
- Pākura or Pūkeko/Swamp Hen or Pukeko/*Porphyrio porphyrio*
- Pihoihoi/New Zealand pipit/*Anthus novaeseelandiae*
- Piwakawaka/South Island Fantail/*Rhipidura fuliginosa fuliginosa*
- Poaka/Pied stilt/*Himantopus himantopus*
- Pūtakitaki/Paradise shelduck/*Tadorna variegata*

These matters are being taken into consideration and further details will be provided at the substantive stage, including landscaping plans incorporating the taonga species and the development of the riparian margins adjoining Knights Stream.

No areas covered by a statement of association, statutory acknowledgement or any other form of cultural or commercial redress provided in the Ngāi Tahu Claims Settlement Act 1998 would be directly affected by the project. As a general principle, an absence of specific settlement redress does not indicate the absence of an iwi's cultural association with ancestral lands, sites, wāhi tapu or other taonga within an area.

Therefore, the applicant has acknowledged the cultural relationship of Ngāi Tahu within its rohe and in demonstrating this, have contacted them along with Mahaanui Kurataiao Limited and Whitiara regarding engagement on the proposed development. This is outlined further in the consultation summary (**Attachment 14**).

8.0 Engagement and Consultation, and record of response to section 11(1)(b) notice

Ongoing engagement has been undertaken with administering agencies, iwi and key stakeholders as summarised below. A section 11(1)(b) notice was emailed to all relevant stakeholders on 15 April 2026.

A summary of key discussions is set out below and further details are provided in the Consultation Summary at **Attachment 15** which also includes copies of the feedback received. The applicant proposes to continue on-going engagement with the administering agencies, iwi and key stakeholders as noted below, especially through the preparation of the documentation required as part of the substantive stage.

- Contact has been made with Mahaanui Kurataiao Limited, Whitiara Centre Limited and Te Rūnanga o Ngāi Tahu to advise of the proposal and seek feedback from these iwi agencies and Te Rūnanga if the project is of interest.
 - **Mahaanui Kurataiao Limited:** a hui was held with 11 March 2026. Mahaanui provided Preliminary Mana Whenua Advice following a hui (attached). The advice confirms the site sits within Te Taumutu Rūnanga takiwā and identifies Opoira / Knights Stream as a key cultural and environmental feature. Key matters raised include protection of freshwater values (ki uta ki tai / mahinga kai), a minimum 10m waterway setback (and avoiding new impervious surfaces within the setback), ecology and taonga species surveys (including wetlands/waipuna), robust erosion and sediment controls, an ADP for accidental discovery, contaminated land investigation/management (DSI/SMP as required), and incorporation of Ngāi Tahu subdivision and development guidelines (including water-sensitive design and cultural landscape opportunities). The applicant has had regard to this advice and will continue engagement as the proposal is

refined. The applicant will continue engaging with Mahaanui Kurataiao Limited as part of the substantive stage.

- **Whitiara Centre Limited:** a hui was held with 16 March 2026. Following this hui a summary of consultation was received on 20 March 2026 and is attached to this application. In summary, Whitiara Centre Limited emphasises the importance of protecting waterways through appropriate setbacks, planting, and legal mechanisms to prevent future encroachment. Key concerns relate to earthworks management, stormwater and wastewater servicing, protection of freshwater habitats, and the incorporation of indigenous species, with further information requested on stormwater design, waterway protection, ecological values, and site hydrology as part of the information required for the substantive application. The applicant will continue engaging with Whitiara Centre Limited as part of the substantive stage.
- **Te Rūnanga o Ngāi Tahu:** A letter was received on 16 April 2026 in response to the applicant initial email contact on 27 February 2026. The letter advises that the expectation of Te Rūnanga is that full consultation will occur with the relevant Papatipu Rūnanga (before the lodgement of any application. The applicant will continue engaging with Te Rūnanga o Ngāi Tahu as part of the substantive stage.
- **Christchurch City Council (CCC):** Three in person meetings held (19 March 2025, 17 November 2025 and 4 February 2026) in relation to the proposal. The minutes from these meetings are included Attachment 15. A response to the notice of lodgement was received 14 May 2026. Formal response to notice of lodgement received on 14 May 2026. The letter states the information provided (description + draft scheme plan) is too high-level for detailed comment, with key gaps around benefits/FTAA justification, approvals, programme/staging, effects, and concept infrastructure servicing. CCC flags the site's rural/"out-of-sequence" greenfield context and expects a strong policy fit with CDP/CRPS/Greater Christchurch Spatial Plan. CCC's main substantive concerns are infrastructure capacity and funding (especially wastewater—upgrades likely required and CCC may refuse connections if capacity/funding isn't resolved), plus stormwater/flooding constraints, transport network capacity/limited PT catchment, and some urban design/open space matters (clarify stream crossing/bridge, road hierarchy/collector and pedestrian links; consider additional reserve provision). The applicant will continue engaging with CCC as part of the substantive stage. The draft scheme plan and technical reporting attached to this memo addresses the matters raised by CCC at a high-level, which includes servicing options, economics, transport, urban design and ecology. The applicant intends to continue engagement with CCC as the project progresses.
- **Canterbury Regional Council (CRC):** Two in person meetings held (27 July 2025 and 3 December 2025) to discuss the project and the types of consents which will need to be applied for. Pre-Application meeting minutes are attached at **Attachment 15**. A further Teams meeting was held with the CRC on 17 April 2026 to provide an update on the project and a timeframe for lodgement. The CRC was emailed the draft reasons for consent following this meeting. The applicant will continue engaging with the CRC as part of the substantive stage. Received CRC's response to notification (RMA262783) on 15 May 2026. The draft scheme plan and technical reporting attached to this memo addresses the matters raised by the CRC at the various meeting at a high-level, which includes servicing options, economics, HPL matters and ecology. The applicant intends to continue engagement with CRC as the project progresses and share draft technical assessments and work together on drafting consent conditions.
- **Heritage New Zealand Pouhere Taonga (HNZPT):** Pre lodgement consultation initiated via formal email and a Teams meeting held on 2 March 2026. Based on the advice an archaeological assessment is

currently being undertaken for the site. HNZPT are happy to meet again when the archaeological assessment has been completed. Email response to notion of lodgement was received 13 May 2026 which outlined the following:

- We understand you will be applying for an archaeological authority as a part of this fast-track application
- Based on a desktop review there appear to be swampy areas and a creek bordering the southeast of the site
- Archsite does show a midden site (M36/37) recorded along the swampy margins of a connected creek approx. 900m northeast. This site was recorded during the construction of the ChCh Southern Motorway.
- The regional archaeologist advised there may be potential for Māori archaeological sites, especially along the creek.
- The project will need to be assessed by a suitably qualified archaeologist in order to assess effects on any potential subsurface archaeological sites.

The advice recommends that any substantive application includes an archaeological management plan, which must be approved by Heritage New Zealand prior to exercising the authority. They also advised that they can either approve the management plan during the fast-track process or include a condition setting out what information needs to be included in the management plan. Any authority that is granted will be subject to conditions and the response included commonly used conditions that they adapt to each authority. The applicant will meet with HNZT once the draft archaeological report has been completed and continue engaging with them as part of the substantive stage.

- **Department of Conservation (DOC):** Pre-lodgement consultation initiated via formal application to DoC email. A Teams meeting held 18 March 2026 and a pre-lodgement consultation summary received which is attached to this application. The applicant intends to continue engagement with DoC as the project progresses and more detailed investigations undertaken as part of the substantive application.
- **New Zealand Transport Agency (NZTA):** A meeting was held 2 April 2026 and NZTA requested that a draft full ITA is provided to them for comment prior to lodgement of a substantive application. The applicant will continue engaging with NZTA as part of the substantive stage.
- **Ministry for the Environment (MfE):** Pre-lodgement consultation initiated via formal email to MfE at AdminAgencyFTAA@mfe.govt.nz. The email provided an overarching description of the proposal along with a copy of the draft scheme plan. MfE replied via email confirming that following the Fast-track Approvals Amendment Act 2025 last December, MfE is no longer a relevant administering agency for the RMA. The requirements for pre-lodgement consultation with us under section 11 have been removed.

9.0 Conclusion

Having undertaken a high-level planning assessment, it is considered that there are no planning-related reasons why John Paterson Estates could not proceed under the Fast-Track Approvals Act 2024. The proposed John Paterson Estate development represents a well-planned residential expansion that will contribute positively to housing supply and the efficient use of urban land. The master-planned layout provides a connected transport and reserve network, integrates stormwater management and infrastructure servicing, and has been designed with regard to the site's environmental characteristics and surrounding context.

The key regional and project benefits include:

- Delivery of a substantial number of new residential lots within a recognised growth area, contributing to housing supply and affordability;
- Efficient use of land adjacent to existing urban development, supporting consolidated urban form and infrastructure efficiency;
- Provision of integrated transport, walking and cycling connections that improve accessibility and connectivity within the wider network;
- Delivery of coordinated three waters infrastructure and stormwater management systems;
- Economic benefits through construction activity, infrastructure investment, and support for population growth in the southwest Christchurch area;
- Creation of a well-designed, master-planned neighbourhood with associated open space and amenity values; and
- Streamlined and coordinated consenting outcomes, enabling efficient implementation of the development.

Technical assessments undertaken to support the application confirm that potential environmental effects can be appropriately avoided, remedied, or mitigated through the proposed design and through the implementation of standard management measures. The proposal therefore represents an appropriate and sustainable form of urban development. In addition to providing significant new housing opportunities, the development will contribute to the social and economic wellbeing of the community by supporting population growth, enabling investment in infrastructure, and creating a cohesive new neighbourhood.

It is acknowledged that a full and comprehensive Assessment of Environmental Effects will be undertaken as part of the substantive application, however at this stage, no more than minor adverse effects have been identified that preclude the development from occurring.

For these reasons, the proposal is considered suitable for referral and assessment through the fast-track consenting process.