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**Fast-track Approval Act 2024 Referral
Application**

**Planning Assessment
prepared for**

**WOLFBROOK
DEVELOPMENTS
(PEGASUS) LIMITED**

Pegasus West Development Project

27 July 2026

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Planning Assessment

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WOLFBROOK DEVELOPMENTS (PEGASUS) LIMITED

Pegasus West Development Project

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Document Date:	27 July 2026
Document Version/Status:	Final
Project Reference:	0707334
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Executive Summary

This Planning Assessment supports a referral application under the Fast-track Approvals Act 2024 (FTAA) for the Pegasus West Development Project (**Project**). It has been prepared on behalf of Wolfbrook Developments (Pegasus) Limited (**Wolfbrook** or **Applicant**) to provide:

- an explanation of how the project meets the criteria in section 22 of the FTAA (s 13(4)(b) FTAA);
- a general level of detail of all of the proposed approvals, sufficient to inform the Minister's decision on the referral application (s13(2)(d) FTAA);
- an assessment of the Project against any relevant national policy statement and national environmental standard (the New Zealand Coastal Policy Statement is not relevant) (section 13(4)(y)(i) and cl 2 Schedule 5 of the FTAA);
- a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991 (s13(4)(i) FTAA);
- a description of the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects (s 13(4)(h) FTAA) including a description of whether and how the project would be affected by climate change and natural hazards (s 13(4)(v) FTAA);
- a summary of the consultation undertaken on the project with the persons and groups referred to in s 13(4)(j) of the FTAA, together with how feedback received has informed the development of the Project, consistent with section 13(4)(k)(ii) and (ka) of the FTAA. The s 11 notices are contained in Attachment 17 and the s11 notice responses are in Attachment 18. No formal s 11 responses were received from Waimakariri District Council or Whitiara for Ngāi Tūāhūiriri;
- a summary of how the consultation and any responses to a notice given under section 11(1)(b) have informed the project (s 13(4)(k) and (ka)).

The Project is a master-planned residential development with a neighbourhood scale commercial / community node and associated infrastructure, provided as a contiguous extension to the Pegasus, Ravenswood and Woodend urban area. The approximate 77-hectare site is known as 8 Mapleham Drive, Pegasus.

The Project will include the following:

- a. Staged subdivision and development to enable up to 1,000 residential allotments / dwellings across a range of residential densities and to cater for a range of typologies;
- b. Development of a commercial/community node that enables provision of day-to-day needs such as retail, service, healthcare, education, recreation and/or related activities for the community, with specific uses determined through community and market needs;
- c. Associated three waters infrastructure; including an integrated stormwater management and open space network featuring neighbourhood parks and green links;
- d. Minor alterations to Pegasus Boulevard to provide for the access requirements of the development including intersection improvements and a new road access;

- e. Associated earthworks, servicing, landscaping and related works to be implemented in stages.
- f. Areas of land set aside to recognise and provide for cultural and archaeological values including retention of archaeological site M35/440 (pā site) which is registered as a wāhi tapu on the New Zealand Heritage List / Rārangi Kōrero.

The Planning Assessment concludes that the proposal is a development project that would have significant regional and national benefits within the meaning of section 22(1)(a) of the FTAA. Those benefits include:

Housing Supply and Housing Choice

- Provision of up to 1,000 dwellings within one of Greater Christchurch's principal growth areas.
- Delivery of significant additional feasible housing capacity in an area experiencing sustained population growth and strong housing demand, responding to a Council-identified shortfall in feasible housing capacity in the Woodend/Pegasus area (WCGM22 and the IPI 2023 assessment) that ongoing growth and delivery continue to absorb.
- Increased housing choice through a range of residential densities, dwelling typologies and supporting community infrastructure.
- Provision of five percent of the total housing delivered by the Project that responds to identified regional housing needs and market gaps, such as opportunities for housing types that are not readily delivered through conventional market-led development (e.g. affordable, whanau, accessible or social housing).

Well-Functioning Urban Environment

- Consolidation of urban growth and development between Woodend, Ravenswood and Pegasus, supporting a more integrated urban area.
- Efficient use of existing and planned infrastructure, transport networks, community facilities and services.
- Support for the continued development and viability of the Ravenswood/North Woodend key activity centre.
- Delivery of a comprehensively planned urban environment integrating housing, infrastructure, open space, recreation, stormwater and ecological networks.
- Provision of an interconnected open space and recreation network that provides community amenity, recreation opportunities, and walking and cycling connectivity.
- Protection and enhancement of stream, wetland and riparian habitats through ecological restoration, habitat creation, wetland expansion, and integrated blue-green infrastructure.
- Consistent with the strategic outcomes of the CRPS and PWDP, including a well-functioning urban environment, coordinated infrastructure provision and integrated urban development.
- Located on land identified through Greater Christchurch growth planning as free of significant development constraints, supporting efficient and deliverable urban development.
- Resolution of an obsolete and restrictive zoning framework, enabling productive use of a strategically located site that is currently constrained by a resort-based development model with no realistic pathway to delivery.

Climate Change Mitigation

- A consolidated, infrastructure-led urban form that supports reduced greenhouse gas emissions through walkable neighbourhood design, active and public transport connectivity, and the efficient use of existing and planned networks.

Significant Economic Benefits

- Approximately \$834 million in direct construction output, \$211 million in direct GDP contribution and approximately 2,155 equivalent job years during construction.
- Total economic contribution of approximately \$1.35 billion in gross output, \$425 million in value added and approximately 3,936 equivalent job years when indirect and induced effects are considered.
- Long-term support for local businesses and services through an estimated resident population of approximately 2,600 people and associated household expenditure (\$72 million per annum).

Protection and Enhancement of a Nationally and Tribally Significant Cultural Area

- Protection of Taerutu Gully Pā and other identified archaeological sites.
- Retention and enhancement of the Taranaki Stream and Taerutu Stream corridors.
- Opportunities to recognise and express Ngāi Tūāhuriri values, history and associations through landscape design, interpretation, naming and restoration initiatives developed in partnership with mana whenua.
- Opportunities to restore and strengthen the relationship between the site, Kaiapoi Pā to the north of the site, the Taranaki Stream and Taerutu Stream corridor, Kaitiritiri Ridge and the broader cultural landscape.

The Planning Assessment further concludes that referral would facilitate the Project and is likely to enable more efficient and timely delivery than other available approval pathways. In particular, alternative planning pathways are uncertain and may not be realistically available in the short term given the recent completion of the district plan review and the ability for a private plan change request to be rejected. Various types of approvals are required, and the Project is capable of being comprehensively assessed through a single substantive application before an Expert Panel resulting in a consistent set of conditions across the different approvals. The Applicant is a well-resourced developer and the Project is well advanced, supported by an extensive suite of technical assessments, such that it can be considered through the Expert Panel process without materially affecting its efficient operation.

No fundamental planning, infrastructure, transport, stormwater, ecological, cultural or archaeological constraint has been identified that would prevent the Project from proceeding. Water supply and wastewater servicing will require new infrastructure — including a new water treatment and storage facility and confirmation of wastewater treatment capacity — and are matters to be resolved at the substantive stage. On the basis of the Civix assessment, viable servicing solutions have been identified and there is no indication that servicing presents an insurmountable barrier to delivery. The

matters identified through preliminary technical investigations are capable of detailed assessment and management through the substantive fast-track approvals process, as illustrated by the Indicative Master Plan, which has been informed by and responds to those matters. The referral application contains extensive supporting information, and the Minister can be satisfied that there is adequate information to make the referral decision.

Accordingly, the Project satisfies the criteria for referral under section 22 of the FTAA and is suitable for consideration by an Expert Panel.

Planning Assessment



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Introduction

Purpose of this Report

1. This Planning Assessment has been prepared to support a referral application for the Pegasus West Development Project (**the Project**) under the Fast-track Approvals Act 2024 (**FTAA**). It provides:
 - an explanation of how the project meets the criteria in s 22 of the FTAA (s 13(4)(b) FTAA).
 - a general level of detail of all of the proposed approvals, sufficient to inform the Minister's decision on the referral application (s13(2)(d) FTAA).
 - a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991 (s13(4)(i) FTAA).
 - an assessment of the Project against any relevant national policy statement, national environmental standard and the New Zealand Coastal Policy Statement (s 13(4)(y)(i) and cl 2 Schedule 5 of the FTAA).
 - a description of the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects (s 13(4)(h) FTAA), including a description of whether and how the project would be affected by climate change and natural hazards (s 13(4)(v) FTAA).
 - a summary of the consultation undertaken for the purposes of section 11(1)(a) and any other consultation undertaken on the project with the persons and groups the applicant considers are likely to be affected by the Project (s 13(4)(k)). The s 11 notices are contained in Attachment 17 and the s11 notice responses are in Attachment 18.
 - a summary of how the consultation and any responses to a notice given under section 11(1)(b) have informed the project (s 13(4)(k) and (ka)).
2. It provides a high-level overview of the Project and has been prepared having regard to the relevant requirements of s13 of the FTAA (also addressed in the application form).
3. It summarises the Project and the activities it involves, the anticipated positive and adverse effects, the likely significance of those effects, and the extent to which identified issues appear capable of being appropriately addressed through the substantive approvals process.
4. The assessment also identifies the Project's contribution to the purpose of the FTAA and the regional and national benefits expected to arise from its delivery, while recognising that more detailed technical assessment and supporting information will be provided as part of any substantive application should the Project be referred.



Project Description and Location

5. The Project is a master-planned residential development with a neighbourhood scale commercial / community node and associated infrastructure, provided as a contiguous extension to the Pegasus, Ravenswood and Woodend urban area. The approximate 77-hectare site is known as 8 Mapleham Drive, Pegasus.
6. An aerial view of the site is included as **Figure 1** below.

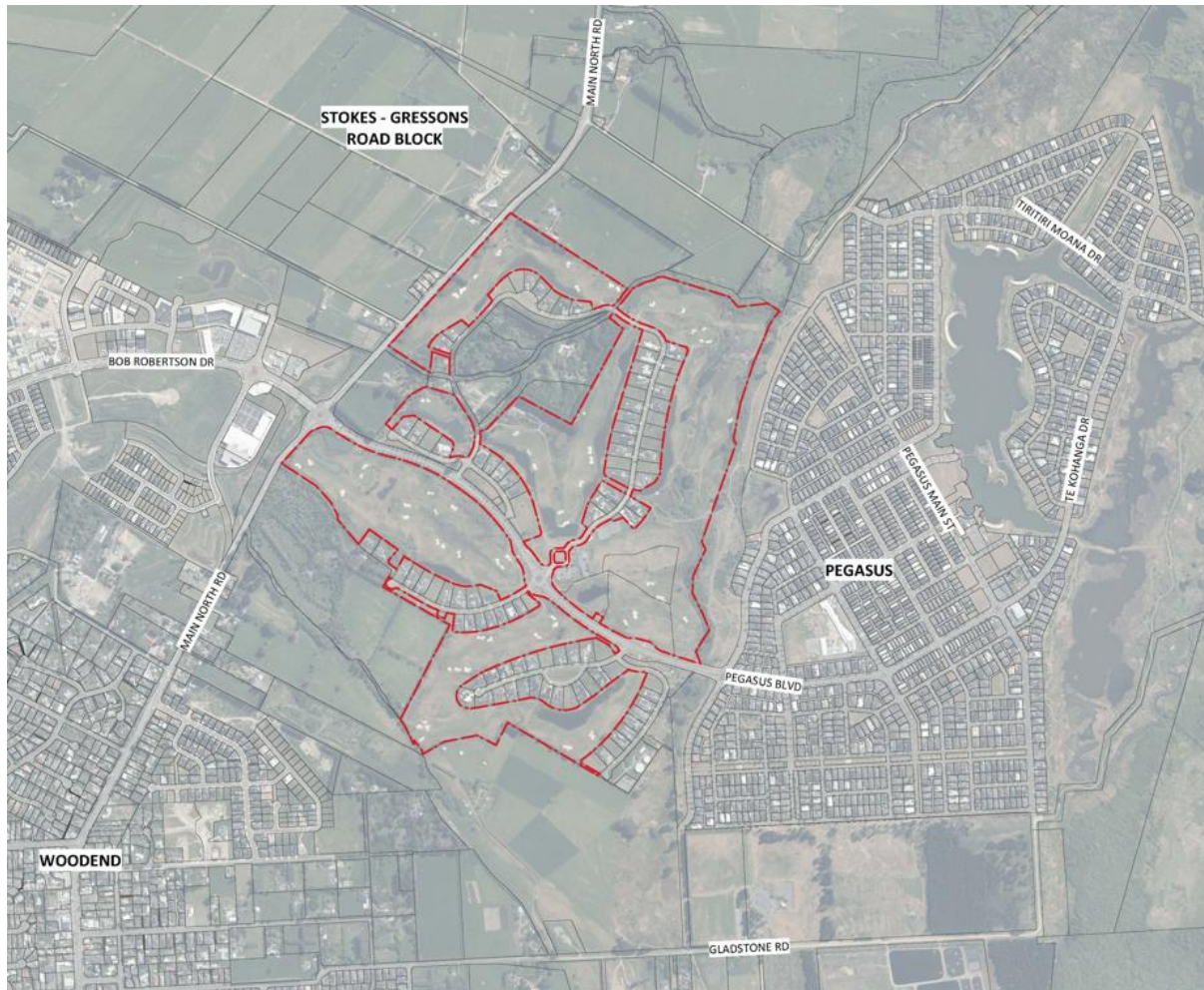


Figure 1: Aerial view of the Site. (Source: LINZ)

7. The Project comprises:
 - a. Staged subdivision and development to enable up to 1,000 residential allotments / dwellings across a range of residential densities and to cater for a range of typologies;
 - b. Development of a commercial/community node that enables provision of day-to-day needs such as retail, service, healthcare, education, recreation and/or related activities for the community, with specific uses determined through community and market needs;



- c. Associated three waters infrastructure; including an integrated stormwater management and open space network featuring neighbourhood parks and green links;
 - d. Minor alterations to Pegasus Boulevard to provide for the access requirements of the development including intersection improvements and a new road access;
 - e. Associated earthworks, servicing, landscaping and related works to be implemented in stages; and
 - f. Areas of land set aside to recognise and provide for cultural and archaeological values including retention of archaeological site M35/440 (pā site) which is registered as a wāhi tapu on the New Zealand Heritage List / Rāangi Kōrero.
8. An Indicative Master Plan is included within **Attachment 3** to the Referral Application and included as **Figure 2** below.



Figure 2: Indicative Masterplan. Source: DCM Urban



9. The location of the Project site represents a logical, coherent and well-connected location for urban development, given it is:
- Contiguous with, and centrally located between, the existing urban areas of Pegasus and Ravenswood (and is approximately 300m from Woodend), enabling consolidated and integrated urban growth, good urban form and efficient integration with existing community infrastructure and services;
 - Highly accessible by a range of transport modes, with good connectivity to established arterial road networks and proximity to State Highway 1, and served by the existing public transport network (route 97 between Pegasus and Rangiora and 95 to/from Christchurch);
 - Located immediately opposite the North Woodend/Ravenswood Key Activity Centre, intended as a focal point for a wide range of retail, commercial, service and community activities, as well as employment opportunities;
 - Not Highly Productive Land; and
 - Located outside of the Christchurch International Airport noise contours.
10. Consistent with a project of this nature and scale, the development is anticipated to proceed in stages with Area G being the final stage. Separate substantive applications are not required for individual stages of the Project¹. With regards to the timing of construction activities, while staging details will be refined as the Project progresses through to substantive, it is anticipated that site works for the first stage could commence in 2028 pending the timing of approvals via a substantive application. The full development could be completed in approximately 6-10 years.

¹ S13(4)(f) requires a statement on whether the development is planned to occur in stages.



Site and Surrounding Context

Site Location and Context

11. The Site is located at 8 Mapleham Drive, Pegasus, within the Waimakariri District, Canterbury. It comprises the former Pegasus Golf and Sports Club and associated landholdings owned by Wolfbrook Developments (Pegasus) Limited. A schedule of the legal titles within the Project area is set out below. The Site has an area of approximately 77 hectares.

Record of Title	Estate	Area (more or less)	Legal Description
400864	Fee Simple	999m ²	Lot 221 Deposited Plan 400595
418579	Fee Simple	1312m ²	Lot 213 Deposited Plan 403716
418583	Fee Simple	82m ²	Lot 701 Deposited Plan 403716
425883	Fee Simple	8.5014 hectares	Lot 2, 4 Deposited Plan 407339
448263	Fee Simple	5067m ²	Lot 206 Deposited Plan 412982
582547	Fee Simple	14.5706 hectares	Lot 210 Deposited Plan 453895
622496	Fee Simple	13.7173 hectares	Lot 211, 701 Deposited Plan 437099
957702	Fee Simple	11.3280 hectares	Lot 205 Deposited Plan 552775
1078393	Fee Simple	2.2512 hectares	Lot 208 Deposited Plan 417391
1147694	Fee Simple	21.3295 hectares	Lot 1 Deposited Plan 595055
1147695	Fee Simple	2.0322 hectares	Lot 2 Deposited Plan 595055
1147696	Fee Simple	1.1106 hectares	Lot 3 Deposited Plan 595055
1147697	Fee Simple	2.7148 hectares	Lot 4 Deposited Plan 595055

Table 1: Schedule of Legal Titles Comprising the Project Area

12. As is common for a landholding of this scale and history, a number of the records of title comprising the Site are subject to registered instruments and encumbrances, including a restrictive covenant associated with the former Pegasus Golf and Sports Club and the adjoining Mapleham environment. Some of these instruments require variation or cancellation and are within the scope of FTAA approvals (as addressed in paragraphs 85-87 and included within this referral application). Outside of the FTAA approvals process, the applicant will need to pursue an “other legal authorisation” in respect of Land Covenant 9295343.11, registered on 622496 (13.7173ha).



13. The Site is situated between the Pegasus township and Ravenswood and is traversed by Pegasus Boulevard, which provides a connection between Bob Robertson Drive and Main North Road (State Highway 1) and the Pegasus urban area. An upgrade to the State Highway (Belfast to Woodend Bypass) is currently progressing through the FTAA process², with a draft decision (to approve) issued at the time of finalising this report. The Ravenswood commercial and residential area lies to the west, the established Pegasus township to the east (separated by the Western Ridge Conservation Area), and a mixture of rural land and low-density residential development occurs to the north and south. Several small residential enclaves, including large-lot residential properties associated with the Maplesham subdivision, are located around the former golf course environment. Many of these properties overlook, or directly interface with, the former fairways, ponds, and open space areas. These residential areas do not form part of the Project Site.
14. The existing environment comprises a highly modified commercial recreational landscape associated with the former Pegasus Golf and Sports Club, which operated an 18-hole championship golf course on the Site from 2009 until its closure in March 2026. The Site contains former fairways, artificial ponds and water features, swales, drainage infrastructure, tennis courts, a driving range, accessways, established vegetation, and several buildings associated with the former golf club operations.
15. The Site contains natural values associated with the Taranaki Stream (including Brockenhurst Wetlands Stewardship Area)³, Taerutu and Wai-Hora stream corridors, wetlands, ponds, and associated riparian and terrestrial habitats. Ecological investigations have identified indigenous biodiversity values within parts of the Site, including freshwater fish habitat, wetland and terrestrial vegetation, lizard habitat, and a range of indigenous bird species.
16. The Site is situated within a wider cultural landscape⁴ associated with the nationally significant Kaiapoi Pā settlement located to the north of the Site⁵ and the historic occupation and use of the lower Waimakariri and Pegasus Bay area by Ngāi Tūāhuriri and their predecessors including associated mahinga kai, settlement and travel corridors. To the east of the Site, the development of the Pegasus Township uncovered a dense archaeological landscape. This archaeological landscape extends into the project area, demonstrated by the recorded archaeological sites that exist within the proposed project boundary⁶ including:
 - 16.1. the Taerutu Gully pā site (M35/440) which is listed as a wāhi tapu, Te Kohanga o Kaikai-a-Waro, on the New Zealand Heritage List / Rārangī Kōrero (List No. 9506).
 - 16.2. borrow pits and associated garden soils (M35/312, M35/159).
17. The Site is a strategically located landholding between Pegasus, Ravenswood and Woodend. It is well placed to support integrated urban growth, improve physical and functional connections

² [Belfast to Woodend Bypass Project Draft Decision to Approve](#)

³ Public Conservation Land administered by the Department of Conservation.

⁴ Identified as Ngā Tūrangā Tūpuna (Cultural Landscape SASM 013 - Waimakariri ki Rakahuri) in the Partially Operative Waimakariri District Plan.

⁵ Kaiapoi (Kaiapohia) Pā (recorded as M35/7 and M35/10 on ArchSite and recognised on the Rārangī Kōrero, List No. 5733)

⁶ Nearby sites advised by HNZPT including middens/ovens (M35/12, M35/1013, and M35/1014) and Kaiapoi Pā (M35/7 and M35/10).



between existing communities, and support the efficient use of existing and planned infrastructure, including the Belfast to Woodend (Woodend Bypass) State Highway 1 upgrade.

Criteria for referral under s 22 of the FTAA

18. The FTAA has established a consenting framework that differs from the Resource Management Act 1991 (the RMA). Section 13(b) of the FTAA requires an explanation of how the Project meets the criteria in s 22. The matters outlined in ss 22(1)(a), 22(1)(b) and 22(2) of the FTAA direct the considerations available to the Minister when assessing a project's eligibility for referral.
19. S 22(1) sets out the criteria for accepting a referral, which are that:
 - (a) the project is an infrastructure or development project that would have significant regional or national benefits; and
 - (b) referring the project to the fast-track approvals process:
 - (i) would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and
 - (ii) is unlikely to materially affect the efficient operation of the fast-track approvals process.
20. When determining whether a project meets the criteria in s 22(1)(a), the Minister may also consider the matters at s 22(2).
21. **Table 2** below provides a guide to the overall consideration of the Project against those criteria.

Table 2: FTAA Section 22 Criteria

Section 22 – Fast-track Approvals Act 2024 Criteria	Criterion	Report paragraph reference
(1)(a)	The project is an infrastructure or development project that would have significant regional or national benefits	Paragraphs 22-27
(1)(b)	Referring the project to the fast-track approvals process – Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and Is unlikely to materially affect the efficient operation of the fast-track approvals process.	Paragraphs 54-66
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	Paragraphs 28-40



	National Policy Statement on Urban Development 2020)	
2(a)(iv)	Will deliver significant economic benefits	Paragraph 41
2(a)(vii)	Will support climate change mitigation, including the reduction or removal of greenhouse gas emissions	Paragraphs 42-45
2(a)(x)	Is consistent with local or regional planning documents, including spatial strategies.	Paragraphs 46-51
2(b)	Any other matters the Minister considers relevant.	Paragraphs 52-53

Significant regional or national project benefits

S 22(1)(a) - the project is an infrastructure or development project that would have significant regional or national benefits

22. Pegasus West is a large-scale residential-led mixed-use urban development project that, along with new local services, public open space and recreation assets, will create significant economic activity. It will also provide for the protection and enhancement of values associated with a nationally and tribally significant cultural area.
23. The Economic Assessment (Market Economics) included as **Attachment 4** to the Referral Application estimates that construction of the residential component and associated infrastructure will generate approximately \$847 million in direct construction output, approximately \$211 million in direct value added (GDP), and approximately 2,155 equivalent job years. When indirect supply chain and induced household expenditure are taken into account, the total construction-phase contribution rises to approximately \$1.35 billion in gross output, approximately \$425 million in value added, and approximately 3,936 equivalent job years across the wider economy over the construction period.
24. These estimates are conservative. They relate primarily to the residential component of the Project and do not separately quantify the construction and operation of the proposed commercial land or other non-residential activities. When those components are taken into consideration, the overall economic benefits of the Project are expected to be materially greater than the modelled values, reinforcing the Project as one with significant regional benefits.
25. Beyond the construction phase, the completed development would generate approximately \$72 million in annual household expenditure (including approximately \$33 million in retail expenditure). This ongoing expenditure would support local businesses, services and community facilities, contribute to the viability of the Ravenswood Key Activity Centre and other nearby centres, and strengthen the functional integration of the wider Woodend/Pegasus/Ravenswood urban area.
26. The benefits are therefore not confined to the immediate Site. The Project will also contribute to the wider Canterbury housing and labour markets and to the consolidated development of a key growth node within Greater Christchurch, consistent with the intent of s 22(1)(a) and s 22(2)(a)(iv)



of the FTAA. As discussed below under the s 22(2)(a)(iii) assessment, the Project also commits to providing five percent of the total housing delivered by the Project, to an area of regional housing needs deficiency⁷, that is, housing of a type or price that is not typically delivered by the market.

27. The Project Site lies within a cultural landscape of national significance, immediately south of the former Kaiapoi Pā — historically the cultural, political and economic stronghold of Ngāi Tahu in Te Waipounamu, the hub of an extensive pounamu trade network, and the site of significant warfare that has left a rich archaeological record. Within the Project Site is Taerutu Gully Pā (M35/440), which pre-dates Ngāi Tahu occupation and forms part of the wider wāhi tapu Te Kōhanga o Kaikai-a-Waro (Heritage New Zealand List No. 9506). Despite modification of the land over time, the wider landscape and the sites within it remain highly valued by mana whenua and Ngāi Tahu more broadly. The Project's focus on the ongoing protection of existing in-situ recorded archaeological and wāhi tapu sites, together with the opportunity to reflect and respect this nationally important cultural landscape, has the potential, with the support of mana whenua, to deliver meaningful cultural and archaeological benefits.

S 22(2)(a)(iii) – Housing supply, housing needs and well-functioning urban environment

28. The Project will provide up to 1,000 residential dwellings in a strategically located growth area, with capacity to accommodate around 2,600 future residents. It will provide a significant increase in the supply and variety of housing within the northern Greater Christchurch urban area and will directly respond to sustained housing demand within Waimakariri District.
29. As set out in **Attachment 4** (Economic Assessment), Waimakariri District continues to experience strong population growth, with Woodend/Pegasus emerging as an increasingly important residential growth node. Between 2020 and 2025, approximately 1,650 dwellings were consented in the wider Woodend/Pegasus area, representing approximately 37% of all residential consents issued within the District over that period. The area's population increased by approximately 3,000 residents between 2020 and 2025.
30. The Waimakariri Residential Capacity and Demand Model (WCGM22) and subsequent Intensification Planning Instrument (IPI) 2023 Economic Assessment, identified a shortfall in feasible housing capacity within Woodend / Pegasus over the medium and long term (of 280 and 3,050 dwellings respectively). This is shown on Table 3 below:

	2023-2033 Short-Medium	2023-2053 Long
Woodend-Pegasus Dwelling Situation		
Demand +Margin	2,480	5,840
Feasible Supply	2,200	2,790
Sufficiency	-280	-3,050

Table 3: Estimated Shortfall of Feasible Development in Woodend-Pegasus in 2022
(Source: Waimakariri Residential Capacity and Demand Model – IPI 2023, Formative, December 2023)

31. While subsequent planning decisions – including the rezoning of land at Gressons Road, North Woodend, have expanded the residential land supply pipeline, ongoing population growth and

⁷ As identified in the Waitaha Canterbury Regional Housing Strategic Plan or similar.



housing delivery continue to absorb available development opportunities. Market Economics (Appendix 4) notes that approximately 1,650 dwellings were consented within the wider Woodend/Pegasus area between 2020 and 2025, while the area's population increased by approximately 3,000 residents over the same period. Market Economics further concludes that, while Gressons Road (approximately 1,500 dwellings) will make a significant contribution towards future housing supply, it would not fully offset the long-term feasible housing capacity shortfall identified in the WCGM22 under the adopted high-growth scenario

32. Importantly, the WCGM22 recognised that while the MDRS and IPI provisions significantly increased theoretical plan-enabled capacity, much of that additional capacity was not considered commercially feasible or reasonably realisable, with future housing supply expected to continue to rely heavily on greenfield development and lower-density infill opportunities.
33. Maintaining an adequate supply of well-located housing capacity remains important to support a responsive and competitive housing market. In this context, the Project represents a strategically significant source of additional housing capacity within the Woodend–Pegasus–Ravenswood area. However, its housing benefit is not limited to addressing an identified localised shortfall. Rather, the Project will contribute to maintaining a competitive and responsive supply of residential land, increase housing choice and market flexibility, and provide additional capacity to accommodate future population growth, changing housing preferences and evolving development patterns. A distinguishing feature of the Project is the Applicant's commitment to deliver five percent of total housing (c40-50 residential units) to meet an identified regional housing need and market gap⁸. This will contribute to a more diverse housing supply by providing housing options that are not currently, or are insufficiently, delivered by the market. The specific form of this housing will be developed in partnership with relevant stakeholders prior to the substantive application.
34. Additionally, the Site will contribute to a well-functioning urban environment by:
 - Providing additional homes and a range of housing choices in a high-growth part of Greater Christchurch;
 - Providing opportunities for Māori to express their cultural traditions and norms including through the ongoing protection of wāhi tapu sites and archaeology and enhancement of natural values associated with early occupation of the area;
 - Improving physical and functional connections between Pegasus, Ravenswood and Woodend;
 - Supporting the North Woodend/Ravenswood Key Activity Centre and other nearby local services;
 - Enabling efficient use of existing and planned infrastructure, including the planned Belfast to Woodend / Woodend Bypass State Highway 1 upgrade;
 - Providing an urban form that supports walking, cycling and public transport accessibility;

⁸ Ibid.



- Integrating stormwater, ecology and open space within a connected green-blue network; and
 - Supporting the competitive operation of land and development markets through the provision of additional housing.
35. Government has clarified that the elements of a well-functioning urban environment go beyond the non-exhaustive list in Policy 1 of the NPSUD and that the Policy 1 considerations were intended “*to establish matters that contribute to good urban outcomes but do not consistently receive adequate consideration in planning practice*”⁹. The guidance explains that there are other factors that contribute to this outcome that Councils and other decision-makers may wish to consider alongside those of the NPS-UD, such as the principles of urban design.
36. The DCM Urban Design Statement (**Attachment 5**) concludes that the Project demonstrates good urban design outcomes and embodies a number of recognised urban design principles that contribute to a well-functioning urban environment. The proposed development will create an integrated, walkable and connected neighbourhood, supported by an extensive green-blue network, high-quality public open spaces, and strong connections to surrounding residential areas, services and amenities. The Urban Design Statement concludes that the Project will deliver a coherent urban form that supports housing choice, accessibility, community wellbeing and environmental enhancement, while responding appropriately to the site's cultural, landscape and ecological context. At the substantive stage, the development will carry through the master plan principles for good urban design, into subdivision layout, street design, reserve interfaces, stormwater design, CPTED, acoustic treatment, landscape implementation and built form controls or guidance.
37. Well-functioning urban environments are clearly also those that avoid areas of significant land use constraint — including, relevantly, significant natural hazards, airport noise overlays and protected public land — while recognising and protecting wāhi tapu and wāhi taonga from inappropriate disturbance or damage, providing for the economic, social and cultural needs of communities, and protecting and enhancing natural values. As identified in the Greater Christchurch Spatial Plan, much of the Greater Christchurch sub-region is affected by such constraints, limiting potential areas to accommodate future growth (**Figure 2** below). By contrast, the Pegasus West project area is largely free of these constraints, while also providing opportunities to enhance natural, open space, cultural and heritage values through sympathetically designed development.

⁹ [Ministry for the Environment: Well-functioning Urban Environments Factsheet](#)

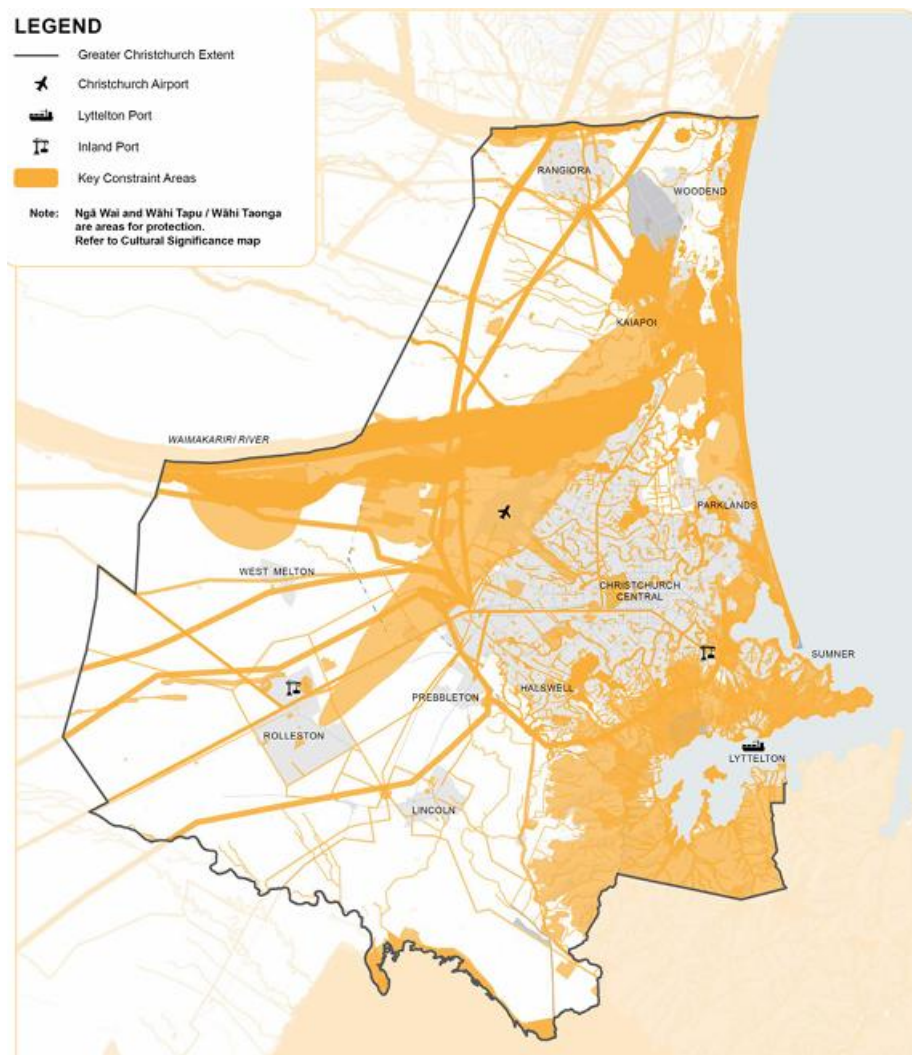


Figure 3: Key Constraint Areas (Source: Greater Christchurch Spatial Plan)

38. Well-functioning urban environments also have good accessibility between housing, jobs, community services, natural and open spaces. Pegasus West will provide future residents with convenient access to existing and planned open space, recreation facilities, schools, commercial services and community infrastructure within the wider Woodend–Pegasus–Ravenswood urban area, along with the provision of new local services and facilities on the Project site itself. The urban context plans included within **Attachment 3** show the range of key community amenities already available within walking distance of the project site and it is anticipated that the range of nearby services will expand as the North Woodend / Ravenswood Key Activity Centre grows into its intended role. The plans also show the wide variety of recreation areas and facilities already accessible to the local community including parks/playgrounds, sports grounds and golf courses.
39. The site is also well-connected to more distant locations including Rangiora, Pegasus and Christchurch, by the existing public transport network and State Highway 1.
40. Overall, it is considered that the Site's redevelopment for comprehensive mixed-use development, provided it is supported by necessary investment in three waters infrastructure,



appropriate management of natural hazards and protection of important natural, cultural and heritage values, strongly contributes to a well-functioning urban environment.

S 22(2)(a)(iv) - will deliver significant economic benefits

41. The Economic Assessment (**Attachment 4**) provides an outline of the significant economic benefits that will be delivered by the Project. As set out above, the Project is expected to generate approximately \$847 in direct construction input, \$425 million in value added (GDP) and approximately 3,936 equivalent job years across the wider economy during construction (including indirect and induced effects), plus approximately \$72 million in annual household expenditure once the development is occupied. These economic benefits do not account for non-residential elements of the Project and are thus seen as conservative. On any reasonable measure, these benefits are 'significant' for the purposes of s 22(2)(a)(iv).

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

42. The Project aims to minimise greenhouse gas emissions where possible, through construction methodology and overarching design principles.
43. During construction, greenhouse gas emissions will be reduced through a range of measures, which could include the following:
- Optimising earthworks to minimise import/export of material and reduce truck movements to and from the site;
 - Using local contractors and locally-sourced construction materials (where practicable) to reduce haulage distances;
 - Staging development efficiently to minimise construction traffic; and
 - Coordinating infrastructure delivery to avoid duplication of works and associated construction emissions.
44. Following construction, the ongoing reduction of greenhouse gas emissions will be supported through:
- Provision of up to 1,000 residential lots within a comprehensively planned urban community that forms a logical extension of the Pegasus/Ravenswood urban area, reducing the pressure for more dispersed residential growth;
 - Enabling residents to access employment, commercial services, recreation facilities and public transport connections within a connected urban environment;
 - Providing modern infrastructure and housing stock that will generally achieve higher levels of energy and water efficiency than older residential developments;
 - Incorporating walkable neighbourhood design principles, open space networks and active transport connections that encourage walking and cycling for local trips.



45. Overall, the Project will contribute towards the reduction of greenhouse gas emissions as a means to support climate change mitigation.

S 22(2)(a)(x) – Consistency with local or regional planning documents, including spatial strategies

46. The Pegasus West Project is broadly consistent with the intent of the Greater Christchurch Spatial Plan 2024 (GCSP) and Chapter 6 of the Canterbury Regional Policy Statement (CRPS), notwithstanding that the Site sits outside the "existing urban area" shown on CRPS Map A and is not identified as a growth area on the GCSP settlement pattern. Both documents nonetheless seek a consolidated and integrated urban form, well-designed neighbourhoods that recognise mana whenua values and emphasise the importance of the blue-green network, including as a means to express cultural values.
47. Both documents support the integration of land use with infrastructure, and provision of sufficient well-located housing capacity to meet Greater Christchurch's growth needs. The Project responds directly to those outcomes:
- **Location between existing urban areas** (CRPS Chapter 6 consolidation direction; GCSP compact-urban-form direction): While the Site is not identified for urban growth, it is a contiguous landholding directly between the established urban areas of Pegasus, Ravenswood and Woodend, and is not a dispersed or isolated greenfield location. Redevelopment for urban purposes strengthens the physical and functional connections between three settlements that are otherwise separated by the former golf course, and does not extend the urban footprint into a new or unrelated part of the District.
 - **Well-functioning urban form and housing choice** (CRPS Chapter 6 urban design principles – tūrangawaewae, integration, connectivity, safety, housing choice and diversity): The Indicative Master Plan accommodates up to 1,000 dwellings across a range of typologies and densities, a local commercial/community node, an integrated green network, and walking/cycling connections to the Ravenswood Key Activity Centre and existing Pegasus township, consistent with the urban design outcomes sought by both documents.
 - **Efficient use of existing and planned infrastructure (CRPS Chapter 6 infrastructure integration; GCSP integration direction)**: The Site is directly accessed from Pegasus Boulevard and adjoins the State Highway 1 corridor, with development occurring alongside the Belfast to Woodend / Woodend Bypass upgrade. While Waimakariri District Council has identified potential constraints in the availability of wastewater and water supply infrastructure to service growth of this scale, the Applicant is continuing to engage with the Council to better understand these matters and inform appropriate servicing solutions. As outlined in the Civix Engineering and Infrastructure Report (**Attachment 8**), potential servicing options have been identified at a high level and will be further developed and refined through the substantive application process in consultation with the Council. This is recognised as a matter requiring further detailed assessment as appropriate for a substantive application.
 - **Blue-green network and cultural landscape** (GCSP blue/green network and mana whenua directions; CRPS urban design principles): As shown on the Indicative



Masterplan the Project retains and enhances the Taranaki and Taerutu Stream corridors, protects Taerutu Gully Pā and the associated wāhi tapu Te Kōhanga o Kaikai-a-Waro, and has the potential to work in partnership with Ngāi Tūāhuriri to give effect to the cultural and blue-green outcomes both documents expect to be reflected in urban growth areas.

- **Housing supply within a recognised growth node:** The GCSP recognises Woodend/Pegasus as a substantial and continuing residential growth node within Greater Christchurch. The Project responds to that recognition by adding well-located, deliverable housing capacity in an area already accommodating a significant share of the District's residential growth (approximately 37% of Waimakariri consents 2020–2025).
48. The Project is acknowledged to depart from CRPS Objective 6.2.1(3) and the GCSP settlement pattern in that it proposes urban development outside the identified urban area. That is precisely the circumstance that the FTAA – and Policy 8 of the NPS-UD – are directed at¹⁰: enabling significant, well-located and deliverable proposals to be considered on their merits, even where they have not been anticipated by existing planning documents. Assessed against the purpose of Chapter 6 and the GCSP – a consolidated, integrated, well-served and culturally-responsive urban form – the Project is considered broadly consistent with those documents for the purposes of s22(2)(a)(x).
49. The Project is consistent with parts of the Partially Operative Waimakariri District Plan (PODP) and inconsistent with others; clearly it is inconsistent with the single-purpose objective of the SPZ(PR) zoning, which is directed to a high-quality visitor resort centred on the existing 18-hole international championship golf course. Because the SPZ(PR) provides only limited residential activity within defined activity areas, the Project (up to 1,000 dwellings, a commercial/community node and integrated infrastructure) would require consent as a non-complying activity under the PODP.
50. The Project is, however, broadly consistent with the strategic outcomes sought by the Rautaki ahunga / Strategic Directions chapter of the PODP. The Project seeks no net loss and protection of indigenous vegetation and habitats (SD-O1), creation of a well-functioning urban environment as a consolidated extension of the Pegasus / Ravenswood / Woodend urban area (SD-O2), coordinated infrastructure and multi-modal connectivity (SD-O3), recognition and protection of Ngāi Tūāhuriri values and sites — including Taerutu Gully Pā (M35/440) and the wider wāhi tapu Te Kōhanga o Kaikai-a-Waro (SD-O5), and appropriate management of natural hazard risk (SD-O6). SD-O4 (rural land) is not engaged, as the Site is not zoned rural, is not highly productive, and is materially constrained for productive use. The one point of tension is with the spatial focus of the urban development direction on Rangiora, Kaiapoi and identified development areas, but this is confined to the location of new residential capacity and again, is the type of appropriate but unanticipated urban growth circumstance addressed by Policy 8 of the NPS-UD and s 22(2) of the FTAA. Read in the round, no strategic-level Rautaki ahunga outcome is materially undermined by the Project.
51. The Waimakariri 2048 District Development Strategy 2017 (DDS) is now dated, but remains the Council's 30-year framework for accommodating approximately 15,000 additional households, together with the associated infrastructure, open space and business land required to support

¹⁰ Notwithstanding that Policy 8 applies to plan changes for unplanned or out of sequence growth.



that growth. The Project is consistent with the growth, infrastructure and environmental directions of the DDS, in that it delivers well-located, deliverable residential capacity within the recognised Woodend/Pegasus growth node — an area that has accommodated approximately 37% of the District's residential consents between 2020 and 2025. The Site itself was not identified in the DDS as a future greenfield growth area, reflecting its then (ie 2017) anticipated continuation of consented golf course use. The Project provides a logical, contiguous urban extension between Pegasus, Ravenswood and Woodend. For the reasons set out in relation to the PODP Strategic Directions and Policy 8 of the NPS-UD above, this limited misalignment with the spatial pattern anticipated in the DDS does not materially undermine the strategic growth, infrastructure and environmental outcomes the DDS is directed at.

S 22(2)(b) – any other matters the Minister considers relevant

52. The Project's distinctive features that may be relevant to the Minister's consideration under s 22(2)(b) include:

- **Redevelopment of a strategically located but underutilised former privately owned recreation site that went into liquidation.**
- **Resolution of a restrictive and potentially sterilising zoning framework.** The Site is subject to a Special Purpose Zone that is predicated on the delivery of a golf resort and tourism-based development use, which has demonstrably failed to establish as a commercially viable activity. While the zone enables a limited range of alternative recreation and sports-related activities, these remain highly specialised uses with uncertain demand and no evident pathway for delivery. Unlike the neighbouring Christchurch District Plan, which incorporates underlying zoning provisions that provide flexibility where privately owned recreation facilities are no longer viable, the Waimakariri PODP contains no equivalent mechanism. As a result, the Site is effectively constrained to a narrow range of activities despite clear evidence that the intended resort outcome is no longer achievable, creating a real risk of long-term underutilisation of a strategically located site. Even a return to rural production activities would require a fully discretionary resource consent and would sit uncomfortably with the zone's tourism and resort-focused policy framework.
- **Significant opportunities for cultural expression and partnership with Ngāi Tūāhuriri (through Whitiara Centre Limited),** including the retention and protection of Taerutu Gully Pā (M35/440) and other recorded archaeological sites, and the integration of mana whenua values through design, naming, interpretation and place-making initiatives.
- **Retention and enhancement of the Taranaki and Taerutu Stream corridors and their riparian margins,** providing ecological, cultural, landscape and open space benefits within an urban environment.
- **Alignment with the concurrent State Highway 1 upgrade (Belfast to Pegasus Motorway and Woodend Bypass),** which will improve transport safety, reliability and connectivity for the northern Greater Christchurch area. By accommodating additional population in a location directly served by this significant transport investment, the Project will help maximise the benefits of the upgraded corridor, support a more efficient and consolidated urban form, and contribute to the growth in travel demand and corridor utilisation that underpins the long-term value and funding case for the infrastructure, including any user-pays tolling arrangements under consideration.



- **Enhanced public recreation and community benefits.** While the Project would replace the former privately owned golf course, it would provide broader and more accessible recreation opportunities for residents and the wider community. These include new active and informal recreation facilities, together with opportunities for sports facilities, tennis courts, walking and cycling trails, open space networks, and improved public access to areas that are currently unavailable for general community use. The Project therefore has the potential to deliver a wider range of recreational, health and wellbeing benefits than the existing private recreation model.

53. A further matter relevant to s 22(2)(b) is:

- **Potential to deliver a broader range of housing outcomes than typically achieved through conventional greenfield development.** The Project has the potential to support a more diverse mix of housing typologies, tenures and price points than is commonly delivered through market-led greenfield development in Waimakariri and Greater Christchurch. This is consistent with the Waitaha Canterbury Regional Housing Strategic Plan 2025, the Greater Christchurch Targeted Update of the Housing Needs Assessment 2026, the Greater Christchurch Housing Action Plan, and the Greater Christchurch Spatial Plan (including the Kāinga Nohoanga Strategy), which identify ongoing shortfalls in smaller homes, affordable and rental housing, and a wider range of housing choices. In addition, the Applicant has committed to providing five percent (approximately 40–50) residential units directed towards identified regional housing needs and market gaps. The specific form of this housing will be developed in partnership with relevant stakeholders through the substantive application process. Collectively, these outcomes have the potential to assist in addressing housing needs that are currently, or are insufficiently, met by the market.

Section 22(1)(b) Appropriateness of the FTAA for the Project

54. With respect to s 22(1)(b)(i) of the FTAA, part of the criteria for accepting a referral application is that the FTAA process would facilitate a more efficient and timely delivery of the Project.

Efficiency of a single, integrated FTAA process

55. The FTAA provides a significantly more efficient pathway for the Project than would be available under the RMA. The ability to seek all necessary approvals through a single substantive application, considered by one Expert Panel within prescribed statutory timeframes, creates substantial efficiencies for both the applicant and decision-makers.
56. The efficiency benefit is amplified for the Project because a number of approvals will be required under other legislation beyond the RMA, including archaeological authorities under the Heritage New Zealand Pouhere Taonga Act 2014 and wildlife permits under the Wildlife Act 1953, that can be bundled together through the FTAA process and considered alongside the RMA approvals. Sequencing those approvals through separate statutory regimes would materially increase cost, time and coordination risk, and ensure that consistent conditions that do not contradict each other, are applied to the different approvals.
57. In respect of the RMA approvals, were the Project to proceed via conventional RMA means, it would likely involve a complex and potentially contentious rezoning and/or consenting process, including public notification, hearings and appeal rights. In those circumstances, zoning changes



could take several years to become operative, delaying delivery of housing and associated infrastructure. By contrast, the FTAA provides a streamlined process that could allow a substantive decision to be obtained within six to twelve months of lodgement, with limited appeal rights, potentially enabling the Project to proceed several years earlier than under the traditional RMA pathway.

Absence of viable alternative pathways

58. Alternative approval pathways are unlikely to be available to the applicant at this time. Waimakariri District Council has recently completed its district plan review, and a private plan change is likely to be precluded (or refused) as WDC can reject a private plan change for a number of reasons including instances where a district plan has been operative for less than two years, and/or if it considers that the request is not in accordance with sound resource management practice¹¹.
59. Waimakariri District Council, through the Mayor, has publicly expressed opposition to the Project and has invited the Minister to decline a referral¹². That position is noted and respected. However, it is a policy position rather than an assessment of the Project's environmental effects, planning merits or potential regional and national benefits. The Applicant is not aware of any matter identified by the Council that would render the Project unsuitable for referral, nor have any such matters been identified through the Council's section 11 feedback. The FTAA expressly provides for the Minister to determine referral applications having regard to the matters in section 22, including whether a project may deliver significant regional or national benefits. The Applicant remains committed to constructive engagement with the Council through any substantive process and considers that the matters raised to date are capable of detailed assessment and, where necessary, management through the Expert Panel process.
60. Further, as discussed later in this assessment, the Project may involve the loss of some extent of natural inland wetland, which under the NES-Freshwater could constitute a prohibited activity. If that were the case, no resource consent application could lawfully be made under the RMA, and the FTAA would be the only available pathway through which the Project could be considered. In saying that, no prohibited activity has been identified at this stage. Rather, the ecological investigations have identified wetland features that require further delineation and assessment against the definition of a natural inland wetland under the NPS for Freshwater Management and the NES-Freshwater. If any activities are proposed within natural inland wetlands, further assessment will be required to confirm their activity status under the NES-Freshwater and Canterbury Land and Water Regional Plan, including whether any proposed activity could result in prohibited drainage of a natural inland wetland.

Appropriateness of the FTAA for the characteristics of this Project

61. The FTAA is particularly appropriate for Pegasus West because the key issues are interrelated. Urban design, transport, stormwater, ecology, recreation, open space, cultural values, archaeology and infrastructure servicing all need to be considered together. A single substantive application process will enable an integrated package of design, assessment, mitigation and

¹¹ RMA Schedule 1, Part 2, clause 25

¹² [Pegasus Golf Course & Fast-track | Waimakariri District Council](#)



conditions to be advanced efficiently, rather than fragmented across multiple concurrent RMA and other statutory processes.

62. The regional benefits described above — including housing supply, significant construction and household expenditure, cultural and ecological outcomes, and the potential to deliver housing outcomes not readily achieved by the standard market — are intrinsically linked to the successful approval and implementation of the Project and cannot be realised unless the development proceeds. Delays associated with conventional approval pathways would postpone, and potentially jeopardise, the ability for those benefits to be delivered to the wider Canterbury community.
63. Overall, the FTAA is specifically intended to facilitate nationally and regionally significant development projects through a single, robust consenting process. The Project aligns strongly with that purpose. While the FTAA provides greater efficiency in terms of cost and time, it also ensures appropriate consideration of environmental effects and participation by affected parties.

S 22(1)(b)(ii) – is unlikely to materially affect the efficient operation of the fast-track approvals process

64. Referring the Project to the fast-track approvals process is unlikely to materially affect the efficient operation of that process. The Project is well understood and the approvals required are readily identifiable, such that it can be considered through the ordinary expert panel contemplated by the FTAA.
65. The applicant, Wolfbrook, is a well-resourced developer with an experienced team of technical specialists. As demonstrated by the suite of technical reports supporting this application (**Appendices 3–16**), Wolfbrook has already invested substantial resources in understanding the opportunities and constraints of the Site and developing a comprehensive proposal, including technical investigations, engagement with key stakeholders and the preparation of supporting assessments. As a result, the Project is well advanced and can readily be considered through the processes established under the FTAA.
66. Accordingly, the Project does not give rise to any unusual procedural issues and is not expected to materially affect the efficient operation of the FTAA process. If approved for referral, Wolfbrook would be well placed to progress detailed design and technical assessment, lodgement of a substantive application and implementation, with development anticipated to commence within 6–12 months of obtaining the necessary approvals.

Consents and Approvals Sought

67. This section identifies the approvals likely to be sought as part of a substantive application. This is a preliminary list based on information available at referral stage and will be finalised through the substantive application process.
68. It is anticipated that the Project will require the following approvals under the FTAA, which are identified under the following sub-headings:
 - Approvals described in s 42(4)(a) of the FTAA – being resource consents that would otherwise be applied for under the Resource Management Act 1991 (**RMA**) including subdivision, land use, earthworks, stormwater discharge, and other infrastructure-related



approvals such as works within and near waterways, water take and use and other discharges (air, water and land);

- Approvals described in s 42(4)(b) of the FTAA – being changes or cancellation to resource consent conditions that would otherwise be applied for under the RMA;
- A Wildlife Approval under the Wildlife Act 1953;
- An Archaeological Authority described in s 44(a) or (b) of the Heritage New Zealand Pouhere Taonga Act 2014 that would otherwise be applied for under that Act;
- An approval, dispensation or authorisation that would otherwise be required under the Freshwater Fisheries Regulations 1983 (Complex Freshwater Fisheries Approvals), and/or the Conservation Act 1987 for fish salvage works.
- In the unlikely event that project works affect the Brockenhurst Wetlands (a tributary stream channel of the Taranaki Stream catchment), a concession under s 25 of the Conservation Act 1987 may be required. This wetland area is Stewardship Area under the Act which falls under the definition of Public Conservation Land (PCL) in the FTAA.

RMA APPROVALS - s 42(4)(a) FTAA

Canterbury Land and Water Regional Plan and Canterbury Regional Air Plan

69. The Project will potentially require resource consent for the following activities under the Canterbury Land and Water Regional Plan (LWRP) and the Canterbury Regional Air Plan (CRAP).

- Section 9 RMA - land use consent for large-scale earthworks and land disturbance (including over an aquifer) related to comprehensive mixed-use development, road construction and infrastructure works;
- Section 13 RMA - consents for any works within, or diversion of, existing beds of watercourses and wetlands, engineered ponds, drains and swales – noting the presence of Taranaki Stream, Taerutu Stream, engineered ponds and swales across the site and the likely presence of wetlands¹³;
- Section 14 RMA - water permits for groundwater or stormwater takes and/or temporary construction dewatering, including any community water take required to serve the development;
- Section 15 RMA - discharge consents for the discharge of stormwater from residential, road and commercial/community areas to land and/or water, and for construction-phase sediment discharges;

¹³ See the PDP Ecology Report at **Attachment 11** and the Flowstate Stormwater Assessment at **Attachment 9**;



- Section 15 RMA – discharge consent for the discharge of construction dust related may be required depending on the outcome of the Detailed Site Investigation for Contamination;
 - Consents associated with the loss/reconfiguration of engineered stormwater ponds and any effects on natural inland wetlands, if triggered (see NES-Freshwater discussion below).
70. Detailed design will confirm the specific rules that apply to the Project under the CLWRP and CRAP and the activity status of each application. At this stage, it is not yet expected that the Project will involve any prohibited activities, but that could potentially result in respect of any loss of natural inland wetland habitat. This will be confirmed once detailed wetland assessment and delineation are complete and the subdivision design is further advanced and does not prevent a positive Referral Decision given that FTAA approvals can be granted for prohibited activities.

Partially Operative Waimakariri District Plan

71. The Site is zoned Special Purpose Zone (Pegasus Resort) (SPZ(PR)) under the PODP. The SPZ(PR) provides largely for golf and tourism-related activities, with limited provision for housing in certain 'activity areas' (outside the Project Site). Under the Operative Waimakariri District Plan, the land is zoned part Mapleham Rural 4B and part Rural Pegasus. The SPZ(PR) zoning is still under appeal however only specific parts of the zone have been appealed relating to the potential inclusion of land at 1250 Main North Road, into the SPZ(PR) Zone. The provisions of the PODP therefore have significant weight.
72. The Project will likely require resource consent for the following activities, as a concurrent subdivision and land use, under sections 9 and 11 of the RMA and the PODP:
- Residential activities not provided for as permitted activities within the SPZ(PR);
 - Commercial and community activities within and around the proposed commercial/community node;
 - Subdivision (to create residential allotments, roads, reserves, infrastructure lots and balance land);
 - Earthworks (bulk earthworks associated with formation and shaping of residential allotments, formation of roads and installation of servicing);
 - Disturbance of contaminated soils under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS) (discussed below);
 - Possible Indigenous vegetation clearance as part of wider restoration and works within cultural overlays;
 - Three waters services, and transport-related matters including formation and construction of roads and intersection upgrades to Pegasus Boulevard.



73. Overall, resource consent would likely be required as a **non-complying** activity under the PODP. The effects of any proposal will be assessed in detail as part of a substantive application if successfully referred.

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

74. Resource consent will likely be required under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS).
75. The ENGEO Contamination Preliminary Site Investigation (**Attachment 16**) has identified potential HAIL activities on-site associated with the former golf course operation, including:
- A1 – Agrichemical preparation, storage and use (Facility Maintenance Compound);
 - A6 – Fertiliser storage (Facility Maintenance Compound);
 - A8 – Sheep Dip / Spray Race (Southern Stock Management Area);
 - A10 – Pesticide storage and use (most of site);
 - A17 – Fuel / chemical storage (Facility Maintenance Compound);
 - F4 – Workshops (Facility Maintenance Compound);
 - I – Application of fertiliser (most of site).
76. The ENGEO PSI concludes that potential contaminant source–pathway–receptor linkages may be present depending on the final development layout. The potential contaminants of concern are commonly managed or remediated using established methods. If the proposed development cannot meet the relevant permitted activity criteria of the NES-CS, land use consent will be required. Consent may also be required under the CLWRP contaminated land provisions. As part of any substantive application, a Detailed Site Investigation (DSI) will inform whether remediation and/or management of the soils is required. Contamination risks are not considered to be a constraint to the redevelopment of the Site.

National Environmental Standard - Freshwater 2020

77. The PDP Ecology Report (**Attachment 11**) confirms that the site contains the riparian margins of three streams (Taranaki Stream, Taerutu Stream and Wai-Hora Stream) together with constructed ponds and wetlands. The Project intends to retain and where possible enhance the stream margins and most higher-value natural wetlands, while some constructed ponds, some wetlands and rank grassland will likely be removed and some existing, wetlands enhanced.
78. Consent is anticipated to be required under the NES-F in respect of activities in, on, under or near natural wetlands (including any wetland loss requiring the effects management hierarchy to be applied), works in beds of streams affecting fish passage, and any diversions of surface water. Wetland delineation and further ecological survey will be undertaken to confirm the classification of individual features and the applicable rules. It is not yet known whether the project includes any prohibited activities under the NES-F and this will be determined should the Project be referred to the substantive stage.



Wildlife Act 1953 approvals - s 42(4)(h) FTAA

79. A Wildlife Approval under the Wildlife Act 1953, and as detailed in cl 1 of Schedule 7 of the FTAA, relating to herpetofauna (lizards) and native avifauna is anticipated to be required. The PDP Ecology Report (**Attachment 11**) confirms that the site provides habitat for freshwater fish species, native wetland and terrestrial vegetation, lizards and avifauna (notably waterfowl and water birds). Further site-specific investigations of habitat suitability and species presence will be undertaken, with a Wildlife Act (1953) Authority sought as part of the substantive application. Any further specialist reporting will determine if additional approvals under the Wildlife Act are required.

Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) – Archaeological Authority - s 42(4)(i) FTAA

80. An Archaeological Authority described in section 44(a) or (b) of the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) that would otherwise be applied for under that Act, will be required.
81. The UOA Archaeological Assessment (**Attachment 12**) confirms that a vast number of archaeological sites and features were recorded during previous archaeological investigations of the former Pegasus Golf Course. Sites remaining wholly or partially in situ include the borrow pits and garden soils recorded as M35/159 and M35/312, and the Taerutu Gully Pā (M35/440), together with sites in the north-east of the project area that are not formally recorded in ArchSite. The Indicative Master Plan excludes the known extent of Taerutu Gully Pā, areas of in situ archaeological sites and high archaeological potential along Taerutu Stream in the north-east, and the borrow pits recorded as M35/312 in the south of the Project area from housing development and excavation. Unrecorded archaeological sites may also be present in areas where limited previous excavation has taken place.
82. Because pre-1900 archaeological sites are protected under the HNZPTA, modification of any recorded or unrecorded archaeological sites within the Project area will require an archaeological authority. This authority can be obtained via the FTAA substantive application process, and will be supported by an Archaeological Management Plan and archaeological monitoring/recording protocols.

Standard Freshwater Fisheries Activities / Complex Freshwater Fisheries Approvals - s 42(4)(j) FTAA

83. Given the identification of freshwater fish habitat (including threatened species), it is anticipated that the substantive application could include one or more standard freshwater fisheries activities and may require a Complex Freshwater Fisheries Approval (CFFA), depending on the final design and the extent of works within stream beds and any fish salvage activities.
84. This will be confirmed through further ecological investigations and engagement with DOC prior to lodgement of the substantive application. At this stage is not likely that an in-stream structure is proposed that would impede fish passage, but it is likely that fish salvage activities might occur where fish exist in made-made ponds that are being filled in. The applicant intends to adhere to the New Zealand Fish Passage Guidelines | Earth Sciences New Zealand | NIWA to the extent relevant.



Change or cancellation of Resource Consent Conditions - s 42(4)(b) FTAA

85. A number of changes to, or cancellations of, existing resource consent conditions, including to consent notices, are anticipated to be needed to deliver the Project. The conditions are registered as consent notices 7847832.6, 7847832.7, 12830958.2, 12830958.3, 12830958.4 and 12830958.5 (**Appendix 1**), which impose constraints on lot layout, stormwater management, servicing, geotechnical design and access formation across the Site.
86. It is understood that a condition specified in a consent notice, to be complied with on an on-going basis, can be varied or cancelled under the FTAA. A variation to a condition in a consent notice falls within plain and ordinary meaning of one of the approvals that can be sought, namely a 'change or cancellation of a resource consent condition that would otherwise be applied for under RMA' under section 42(4)(b).¹⁴
87. The change or cancellation of these conditions is known to be material to the implementation and delivery of the Project, because these restrictions likely conflict with the design of the Project as shown on the indicative master plan (cl 3, Schedule 5 FTAA).

Statutory Planning Framework

88. This section is provided in accordance with cl 2(1)(a)(i) – (iii) of Schedule 5 of the FTAA. This requires that applications include an assessment of the activity against the relevant provisions and requirements of the following statutory documents: any relevant national policy statements; and any relevant national environmental standards; and if relevant, the New Zealand Coastal Policy Statement.
89. Cl 2(1)(b) requires the applicant to confirm, to the best of its knowledge, whether any existing resource consents of the kind referred to in s 30(3)(a) are in force. To the best of the Applicant's knowledge, there are no existing resource consents of the kind contemplated in s 30(3)(a). Formal confirmation will be provided as part of any substantive application, noting that s 30(2) requires the authorised person to provide notice to the Regional Council prior to lodgement of the substantive application.

New Zealand Coastal Policy Statement

90. 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. The site is not located in the coastal environment, and the NZCPS is not relevant to the Project.

National Policy Statement on Urban Development 2020

91. The NPS-UD is the principal national policy statement relevant to the Project. It seeks to ensure that New Zealand's urban environments are well-functioning and that there is at least sufficient development capacity to meet housing and business land demand. Its objectives and policies broadly seek to provide for well-functioning urban environments, improve housing affordability

¹⁴ A legal opinion was provided on this point for the Queenstown Cable Car referral application: [\[6\] Legal opinions](#), and the referral application was granted: [Queenstown-Cable-Car-notice-of-decisions-letter.pdf](#). A similar authorisation has been sought by Mt Iron Developments Ltd as part of its substantive application



through competitive land and development markets, enable *at least* sufficient development capacity to meet short, medium and long-term housing demand, support responsive planning decisions where proposals contribute significant additional development capacity, ensure urban development is integrated with infrastructure planning and funding decisions, and recognise that urban environments will continue to develop and change over time in response to community needs.

Objective 1 and Policy 1 – Well-functioning urban environment

92. Well-functioning urban environments described in Policy 1 of the NPS-UD as urban environments that, as a minimum (emphasis added):
- a. have or enable a variety of homes that:
 - i. meet the needs, in terms of type, price, and location, of different households; and
 - ii. enable Māori to express their cultural traditions and norms; and
 - iii. have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
 - iv. have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
 - v. support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
 - vi. support reductions in greenhouse gas emissions; and are resilient to the likely current and future effects of climate change.
93. The Project will contribute to a well-functioning urban environment by delivering a substantial increase in residential development capacity within the northern Greater Christchurch urban area. The Project provides for up to 1,000 residential dwellings across a range of housing typologies, supporting housing choice and the ability of the urban environment to respond to projected population growth, in a location that is highly demanded. This includes housing that is not currently well-served by the traditional housing market and for which there is a regionally identified need.
94. Further discussion about how the project will contribute to a well-functioning urban environment is set out earlier in paragraphs 33-40.

Objective 3 – Enable more housing in highly demanded locations near centres and public transport

95. Objective 3 identifies three key locations where planning frameworks should enable more housing, business land and community services: areas that are close to centres and employment opportunities, areas that are well served by existing or planned public transport, and areas where there is high demand for housing relative to other parts of the urban environment.
96. Pegasus West satisfies each of these criteria. The site adjoins the Ravenswood Key Activity Centre/Town Centre Zone, is served by existing public transport connections to Rangiora,



Pegasus and Christchurch, and is located within one of Waimakariri District's highest-growth residential areas. Market Economics (**Appendix 4**) identifies Woodend/Pegasus as an increasingly important residential growth node, noting that approximately 1,650 dwellings were consented in the wider Woodend/Pegasus area between 2020 and 2025, representing around 37% of all residential consents issued within the District over that period.

97. The Waimakariri Residential Capacity and Demand Model (WCGM22) and subsequent IPI 2023 Economic Assessment identified a shortfall in feasible housing capacity within the Woodend/Pegasus area over the medium and long term. While subsequent planning decisions, including the PODP, have expanded the future housing supply pipeline, continued population growth and strong rates of housing delivery have continued to absorb available development opportunities.
98. Enabling additional housing at Pegasus West is therefore strongly aligned with Objective 3. The proposal would provide additional development capacity in a location that is adjacent to a key centre, well served by public transport, and experiencing sustained housing demand, while also supporting the broader NPS-UD objective of ensuring at least sufficient development capacity to meet projected housing needs.

Objective 4 – Urban environments change over time

99. Objective 4 recognises that urban environments are dynamic and must respond to changing community needs, population growth and housing demand. The Project provides a strategic urban expansion opportunity that will help to accommodate forecast growth within Waimakariri District and the wider Greater Christchurch area. The change from a former golf course to a comprehensively planned residential neighbourhood reflects the expectation of Objective 4 that urban environments evolve over time to meet future needs.

Objective 6 – Responsive and integrated planning

100. Objective 6 promotes planning decisions that are integrated with infrastructure planning and are responsive to opportunities that provide substantial development capacity. The Project is capable of being supported by infrastructure investment and coordinated delivery of transport, servicing, community facilities and open space, drawing on the Novo Group Transport Assessment, (**Attachment 7**), Civix Engineering and Infrastructure Report (**Attachment 8**), and Flowstate Stormwater Assessment (**Attachment 9**). Whilst it is relevant that some infrastructure capacity constraints presently exist with regard to water and wastewater supply, Civix advises that these matters are capable of resolution at the substantive stage. The Project will be designed to ensure the ongoing protection of Strategic Infrastructure (the State Highway) including through the imposition of acoustic design controls for buildings located close to the State Highway and providing space for building setbacks or an acoustic bund, if detailed assessment deems it necessary. The Project is therefore consistent with Objective 6.

Policy 2 – Sufficient development capacity

101. The Project will provide a significant quantity of residential development capacity in a strategically located area, materially contributing to meeting anticipated housing demand within the northern Greater Christchurch urban area. The Economic Assessment (**Attachment 4**) concludes that the Project would supplement existing and planned growth areas, broaden development opportunities available to the market, and provide additional capacity to respond to future population growth (including growth beyond current forecasting assumptions). The Project will



therefore support the maintenance of sufficient development capacity over the long term and contribute to a competitive land and development market, consistent with Policy 2.

Policy 8 – Responsive planning decisions

102. Policy 8 requires decision-makers to be responsive to (rezoning) proposals that would add significantly to development capacity and contribute to well-functioning urban environments, even where that capacity may not have been anticipated by existing planning documents or sequencing frameworks. The Project will provide a substantial increase in development capacity of up to 1,000 residential lots, together with integrated commercial/community, recreational and community infrastructure, in a strategically located and defensible extension of the Pegasus/Ravenswood urban area.
103. While a residential development of this scale in this specific location was not specifically anticipated through recent district planning processes, this is precisely the circumstance that Policy 8 is directed at. The site presents a logical and coherent extension of the existing urban area, with a proponent resourced and ready to proceed. A comprehensively planned delivery on a contiguous landholding enables integrated infrastructure design, coordinated community and open space outcomes, and material economies of scale that an incremental, piecemeal plan change pathway is unlikely to replicate. Accordingly, referring the Project for assessment now is consistent with the responsive and enabling intent of Policy 8 and the NPS-UD more broadly.

NPS-UD summary

104. The Project aligns strongly with the intent of the NPS-UD by providing a significant and strategically located increase in housing capacity, supporting housing choice and a competitive development market, enabling a well-functioning urban environment, and responding to the long-term growth needs of Greater Christchurch. Whilst the Project is not anticipated by the current planning framework, its scale, location, deliverability and certainty align with the responsive planning provisions of the NPS-UD.

National Policy Statement on Freshwater Management 2020

105. The National Policy Statement for Freshwater Management 2020 (NPS-FM) manages natural and physical resources to prioritise firstly the health and well-being of water bodies and freshwater ecosystems, secondly the health and needs of people, and thirdly the ability to provide for the social, economic and cultural well-being of people and communities. The NPS-FM was amended in 2025 in relation to quarrying and mining activities (with provisions taking effect from January 2026); those amendments are not relevant to this Project.
106. The NPS-FM is directly relevant. As set out in the PDP Ecology Report (**Attachment 11**) and Flowstate Stormwater Assessment (**Attachment 9**), the site contains streams, riparian areas, constructed ponds and potential wetlands. The Project will retain and enhance the streams and most higher-value natural wetlands and will apply an effects management hierarchy to any residual effects. The stormwater strategy adopts a swale-led, low-impact approach consistent with Te Mana o te Wai principles and the CLWRP framework. A full assessment against the NPS-FM (including relevant NOF attributes and Te Mana o te Wai) will be provided as part of the substantive application.



National Policy Statement on Highly Productive Land 2022

107. The NPS-HPL sets out the framework for the management and protection of highly productive land under the RMA, requiring Councils to identify and map highly productive land and manage its use and development to ensure it remains available for land-based primary production.
108. Highly productive land is defined in the NPS-HPL as land that has been mapped in accordance with clause 3.4 and is included in an operative regional policy statement as required by clause 3.5 (subject to the transitional provision in clause 3.5(7)). The CRPS does not yet contain maps of highly productive land in the Canterbury Region, so clause 3.5(7) is the relevant transitional provision.
109. Clause 3.5(7) requires the transitional definition to be applied only to land that is zoned General Rural or Rural Productive at the commencement date and is LUC 1, 2 or 3. The Reeftide Soils Assessment (**Attachment 13**) confirms that the site comprises approximately 63.2 ha of LUC Class 2 and 13.8 ha of LUC Class 6 soils, but is zoned Special Purpose Zone (Pegasus Resort) under the PODP (with Mapleham Rural 4B and Rural Pegasus zoning under the Operative Waimakariri District Plan). None of these zones are the equivalent of General Rural or Rural Production. Accordingly, the site is not highly productive land and the NPS-HPL does not apply.

National Policy Statement on Indigenous Biodiversity 2023

110. The NPS-IB seeks the protection, maintenance and restoration of New Zealand's most threatened indigenous species. As identified in the PDP Ecology Report (**Attachment 11**), the site includes indigenous biodiversity values including habitat supporting threatened freshwater fish species, native wetland and terrestrial vegetation, lizards and avifauna.
111. The Project will adopt an effects management approach that includes retention and protection of key waterways, enhancement of retained wetlands, habitat creation, and management of protected species. This approach is consistent with the intent and outcomes of the NPS-IB, subject to the further ecological investigations and effects management measures to be provided at substantive stage.

National Policy Statement for Natural Hazards 2025

112. The NPS-NH applies to flooding, landslip, coastal erosion, coastal inundation, active faults, liquefaction and tsunami hazards. It 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. 'Very high' natural hazard risk must be avoided, and other significant natural hazard risk must be avoided or mitigated in a way that is proportionate to the level of actual risk. The NPS-NH requires the consideration of the potential impacts of climate change to at least 100 years into the future.
113. The Project site is land that is subject to flooding hazard in some parts, and of low to medium risk of liquefaction (reducing to low with mitigation). However, the Project is considered to be consistent with the objective and policies of the NPS-NH for the following reasons:
 - The ENGEO Preliminary Geotechnical Assessment (**Attachment 10**) confirms that the site is broadly consistent with TC1/TC2-type performance away from pond edges, that any lateral spreading risk near pond edges can be confirmed through further investigation, and that any consolidation settlement risk can be managed through



established engineering measures. There are no known geotechnical or natural hazard constraints that would preclude development of the site for residential purposes.

- The Flowstate Stormwater Assessment (**Attachment 9**) confirms that the site is located outside the modelled Ashley River/Rakahuri breakout inundation extent, and that hydraulic neutrality can be achieved with no material increase in peak downstream flood levels. Localised changes in flood depths within and adjacent to the site can be addressed through detailed design.
- The site is located outside the coastal environment and is not susceptible to coastal erosion, coastal inundation or tsunami hazards. Given the flat to gently undulating topography, the site is not subject to landslip.

114. Overall, the proposal will enable 'very high' natural hazard risk to be avoided as part of future subdivision, use and development. Further detail will be provided as part of the substantive application to confirm that any other levels of natural hazard risk can be appropriately managed. Overall, the proposal is consistent with the NPS-NH.

National Policy Statement for Infrastructure 2025

115. The NPS-I provides national direction under the RMA to guide the efficient development, management and upgrading of infrastructure across New Zealand. The Project is not an infrastructure activity, but will include ancillary three waters infrastructure and roading infrastructure to service the development. The proposal is not expected to result in significant adverse effects on infrastructure. Further, the proposal is not expected to be adversely affected by surrounding infrastructure – in fact, the concurrent Belfast to Woodend / Woodend Bypass State Highway 1 upgrade will materially improve the transport context for the Project (Novo Transport Assessment, **Attachment 7**). Overall, the proposal will be consistent with the provisions of the NPS-I.

National Environmental Standards

116. The National Environmental Standards potentially relevant to the Project are the NES-CS, NES-F and, to a lesser extent, the NES-DW. The NES-CS applies because the ENGEO Preliminary Site Investigation identifies potential HAIL activities associated with the former golf course, so land use consent under the NES-CS is likely to be required. The substantive application will be supported by a DSI and any necessary remediation or management measures at substantive stage. The NES-F applies because the Site contains streams, riparian areas, constructed ponds and features that may meet the definition of a natural inland wetland; consents will likely be required for activities in, on, under or near natural wetlands, works in stream beds affecting fish passage, and any surface water diversions. The NES-DW may be relevant to stormwater, wastewater, earthworks and any groundwater takes given the Site's location within the wider Waimakariri groundwater catchment and will be addressed alongside the CLWRP consenting package.
117. Until wetland delineation and further ecological survey are complete, it is not known whether the Project will involve any prohibited activities under the NES-F (including any prohibited drainage of a natural inland wetland). Other NES (NES-AQ, NES-TF, NES-ETA, NES-Plantation and Commercial Forestry, NES-Marine Aquaculture and NES-Storing Tyres Outdoors) are not directly relevant. On current information, no NES-based matter has been identified that would



preclude referral, and all identified NES consents can be comprehensively considered through the FTAA substantive process.

Assessment of Effects

118. This section provides a description of the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects (s 13(4)(h) FTAA);
119. This assessment is based on a series of technical expert assessments. These assessments address: Positive Effects; Landscape, Visual, Urban Form, Density and Character; Transport Effects; Infrastructure and Servicing; Contamination; Natural Hazards; Earthworks / Construction Effects; Ecological Effects; Archaeological; Soils; Recreation, Leisure and Open Space Effects; and Acoustic Effects. Wolfbrook's economic assessment (in **Attachment 4**) has been considered separately. In summary, the Project has been designed to ensure that there are no significant anticipated or known adverse effects on the environment that cannot be appropriately managed.

Positive Effects

120. The Project will result in several significant positive effects, as summarised below:
- **Provision of Significant Housing Capacity in a High-Growth Area:** The Project will deliver up to 1,000 dwellings within a fast-growing part of the northern Greater Christchurch urban area, materially contributing to housing supply, housing choice and market responsiveness. In addition, the Applicant has committed to directing approximately five percent of total housing delivered by the Project (approximately 40–50 residential units) towards addressing an identified regional housing need or market deficiency, providing an opportunity to deliver housing outcomes that are not currently, or are insufficiently, met through conventional market-led development. This commitment will assist in broadening housing choice and supporting a more diverse and responsive housing market (see paragraphs 28–33, 41 and **Attachment 4**).
 - **Consolidation of Growth and Improved Integration between Communities:** The redevelopment strengthens the physical and functional connections between Pegasus, Ravenswood and Woodend, supporting the Ravenswood Key Activity Centre and using existing and planned infrastructure efficiently;
 - **Avoidance of Highly Productive Land:** The site does not contain Highly Productive Land under the NPS-HPL and its redevelopment avoids pressure to accommodate growth on more productive rural land elsewhere in the District;
 - **Protection and Enhancement of Ecological and Cultural Values:** The Project retains and enhances Taranaki and Taerutu Streams and their riparian corridors, protects Taerutu Gully Pā (M35/440) and other identified in situ archaeological sites, and provides opportunities to incorporate Ngāi Tūāhuriri values through design, naming and interpretation;
 - **Recreation, Leisure and Open Space Outcomes:** While the former golf opportunity on-site is lost, the Visitor Solutions Recreation, Leisure and Open Space Memorandum (**Attachment 15**) concludes that there is likely to be a net increase in active and passive



sports, leisure and recreation opportunities available on the site, subject to the mix of new assets being confirmed through the substantive application;

- **Significant Economic Contribution:** Approximately \$425 million in value added, approximately 3,936 equivalent job years and approximately \$72 million in annual household expenditure (see paragraphs 23-26, 35 and **Attachment 4**).

Landscape and Visual Effects

121. Novo Group has prepared a high-level review of the potential landscape and visual effects of the Project (included as **Attachment 6**). It identifies the key landscape and visual considerations, the likely receiving environment, the principal viewing audiences, and the mitigation measures available to manage potential effects. The preliminary assessment concludes that the receiving environment is already substantially modified and forms part of an established and evolving urban settlement pattern. The site is associated with its former golf course use and contains open grassed areas, artificial waterbodies, wetlands, streams, shelterbelt planting, managed open space, existing residential enclaves, roading and infrastructure. The assessment also recognises that the Site forms part of a wider cultural landscape associated with the historic occupation and use of the lower Waimakariri and Pegasus Bay area by Ngāi Tūāhuriri and their predecessors, including waterways, archaeological sites and places of cultural significance that contribute to the landscape's associative and cultural values.
122. It acknowledges that it also sits within a wider context of anticipated residential growth at Pegasus and Ravenswood, and planned transport infrastructure associated with State Highway 1 and the Woodend Bypass corridor. Accordingly, the report concludes that landscape change is anticipated in this location and is not occurring within an unmodified, natural or outstanding landscape.
123. The Novo Group report identifies that the Project will result in discernible physical, perceptual, associative, character and amenity changes as the former golf course landscape transitions to a master planned residential neighbourhood. These changes will include the introduction of residential development, roads, infrastructure, earthworks and a reconfigured open space and waterbody network. However, the Project has been structured as a landscape-led masterplan that retains and integrates key landscape elements, including Taranaki Stream, Taerutu Gully, selected waterbodies, wetlands, stormwater management areas, open space corridors, green links, reserves, trail connections, community recreation areas and planting. These components provide a clear framework for absorbing and managing landscape character and amenity change over time.
124. Visual effects are considered likely to be greatest for adjoining residential properties that currently obtain open or partially open views across the former golf course landscape. Views from public roads, commercial areas and recreational routes are generally expected to be more transient, filtered, screened or experienced within an already urbanising setting. While visual change will occur, the initial review indicates that these effects can be effectively managed through the proposal framework and targeted mitigation measures, including boundary and interface planting, streetscape planting, retention of open space and water features, wetland and riparian enhancement, building design controls, height and scale controls, material and colour controls, lighting management, roading and earthworks management, and staged landscape establishment.



125. Overall, the report concludes that the proposal will result in landscape and visual change, but that the identified effects are capable of being sufficiently managed and mitigated. The Site's modified condition, its relationship with existing and planned urban growth, and the landscape-led arrangement of the proposal all support the conclusion that the development can be integrated into the receiving environment. Subject to the identified mitigation measures being secured, refined and implemented through the substantive application stage, it was concluded that the resulting landscape character, amenity and visual effects are considered manageable and capable of achieving an acceptable landscape outcome.

Urban form, Density and Character

126. The Pegasus West Project responds appropriately to the key urban form principles articulated in the Canterbury Regional Policy Statement (CRPS), the Greater Christchurch Spatial Plan 2024 (GCSP), and supporting mana whenua guidance including Ngā Kaupapa. These documents collectively seek a consolidated and integrated urban form and a compact pattern of development, that provides for housing choice and diversity to meet current and future community needs. They require the coordinated integration of land use with three-waters, transport and community infrastructure, and the delivery of well-functioning urban environments that are accessible, resilient and support social, economic, cultural and environmental wellbeing. They also emphasise protection and enhancement of the blue-green network, recognition of mana whenua values and cultural landscapes, high-quality urban design outcomes (including integration, connectivity, legibility, safety and amenity), and the safeguarding of rural character, productive land and regionally significant infrastructure, alongside an energy-efficient and resilient urban form that responds to natural hazards and climate change.
127. Assessed against these higher-order urban form outcomes, the Project achieves a consolidated, efficient and integrated pattern of development for the following reasons:
- The Site sits within an established and transitioning urban environment, adjoining Pegasus township to the east, the Ravenswood Key Activity Centre to the west, existing residential enclaves associated with the former Pegasus Golf and Sports Club, and the Stokes-Greensons Road residential development to the north. In this context, the Project represents a logical extension of the existing urban area rather than isolated or fragmented urban development.
 - The Project provides for a net residential density of approximately 30 households per hectare and supports a range of lot sizes and housing typologies. The development therefore contributes to the compact urban form and housing choice outcomes sought by the CRPS and GCSP.
 - The master plan integrates residential neighbourhoods with a commercial/community node, open space and recreation areas, walking and cycling connections, and supporting infrastructure. Together, these elements establish an integrated pattern of land use and community infrastructure consistent with the characteristics of a well-functioning urban environment.
 - Interfaces with State Highway 1/Main North Road and the indicative Woodend Bypass corridor have been recognised and addressed at a master plan level through indicative intersection upgrades and acoustic mitigation measures (refer Powell Fenwick Acoustic Assessment, **Attachment 14**). This approach is consistent with CRPS direction to



safeguard the safe and efficient operation of regionally significant infrastructure while appropriately managing reverse sensitivity effects.

- The receiving environment is already undergoing substantial urban transformation as a result of ongoing residential development in Pegasus, Ravenswood and Woodend, together with the modified character of the former golf course landscape. The Project therefore extends an established urban pattern rather than introducing a new urban form into an intact rural environment.

128. These strategic urban form outcomes are reinforced by the DCM Urban Design Assessment (**Attachment 6**), which concludes that the Project is “capable of achieving a positive urban design outcome” and provides a “robust urban design framework for a high-quality and comprehensively planned urban neighbourhood”. DCM concludes that the Project:

- establishes a coherent neighbourhood structure integrated with Pegasus and the wider Woodend/Ravenswood area, and is best understood as a comprehensive urban transformation of the former golf course and resort land within an established settlement rather than a stand-alone greenfield expansion;
- adopts a landscape-led approach that retains and enhances key pond, stream, wetland and gully features as the principal amenity framework for the development, while recognising the cultural landscape values associated with the Site;
- supports housing choice through an appropriate distribution of residential densities, including higher-density development in proximity to the commercial/community node, Pegasus Boulevard and major open spaces;
- provides for local services, recreation and neighbourhood activity through the proposed commercial/community node and associated community recreation areas; and
- addresses key interface matters, including transport and acoustic considerations associated with the Main North Road/Woodend Bypass corridor, through an integrated urban design response.

129. DCM appropriately notes that the successful realisation of these outcomes will depend on detailed design matters being refined through future substantive application and subdivision processes. These include street hierarchy and block structure, active frontages to open spaces and waterways, CPTED outcomes, acoustic treatment design, detailed design of the commercial/community node, and continued engagement with mana whenua.

130. Whilst the area is not presently serviced by urban water supply and wastewater reticulation, the Civix Infrastructure Assessment (**Attachment 8**) indicates that servicing solutions are likely to be available, subject to further investigation and approval through subsequent stages. More generally, the Site's location contiguous with the existing urban area supports the efficient extension of infrastructure networks relative to more remote and isolated greenfield locations.

131. Overall, the Project responds directly to the urban form principles set by the CRPS, GCSP and mana whenua guidance, and supported by the DCM Urban Design Assessment, will not undermine the urban form or function of the wider Pegasus/Ravenswood urban area. The Project can be accommodated without significant adverse effects on urban form, density or character,



and will contribute positively to a well-functioning urban environment consistent with the outcomes sought at both a regional and sub-regional level.

Transport effects

132. The Novo Transport Assessment (**Attachment 7**) addresses transport related effects of the Project. Key findings include:

- The site is well connected to Pegasus Boulevard and State Highway 1 (Main North Road), with access to Pegasus, Ravenswood, Woodend, Rangiora, Kaiapoi and Christchurch;
- The main existing network issues are at the SH1/Pegasus/Ravenswood roundabout and through Woodend. These constraints are already being addressed through the planned and funded Belfast to Woodend / Woodend Bypass, which will replace the existing SH1 roundabout with a grade-separated interchange and signalised ramp connections, improving safety, reliability and access for Pegasus and surrounding growth areas;
- The proposal is estimated to generate approximately 1,306 vehicle movements in the AM peak hour, 1,466 vehicle movements in the PM peak hour and 12,342 vehicle movements per day. These estimates will be refined through further modelling at substantive stage;
- The internal road network can be designed to provide a connected, practical and multimodal subdivision layout, including suitable connections to Pegasus Boulevard and provision for walking, cycling and potential future passenger transport;
- Off-site works are expected to be limited and focused on Pegasus Boulevard access arrangements and the SH1 ramp connections associated with the Woodend Bypass. These can be coordinated with NZ Transport Agency / Waka Kotahi through detailed modelling and design;
- Construction traffic effects can be managed through a Construction Traffic Management Plan.

133. The assessment concludes that no fundamental transport impediment has been identified, and the Project is supportable from a transport perspective at referral stage. Detailed assessment and mitigation will follow at the substantive stage.

Infrastructure and Servicing

134. The Project's infrastructure servicing strategy is supported by three complementary assessments: the Civix Engineering and Infrastructure Report (**Attachment 8**), which assesses earthworks, roading, three waters infrastructure and utility servicing requirements, the Novo Transport Assessment (**Attachment 7**) which addresses access, connectivity and transport network effects; and the Flowstate Stormwater Assessment (**Attachment 9**), which addresses stormwater management, flood mitigation and hydraulic performance. Together, these assessments confirm that the Project can be serviced through a combination of existing



infrastructure, new infrastructure and network upgrades, with no fundamental engineering or servicing constraints identified that would preclude development.

- **Stormwater:** A low-impact stormwater management approach is proposed, building on the established Pegasus stormwater framework. Stormwater runoff will be conveyed via roadside swales, overland flow paths and stormwater management basins that provide treatment, attenuation and flood management functions. Existing stormwater ponds are anticipated to be retained and/or reconfigured where appropriate, with additional stormwater basins provided as required to achieve hydraulic neutrality and maintain pre-development runoff characteristics. The stormwater system will also provide opportunities for ecological, landscape and amenity enhancement.
 - **Wastewater:** Preliminary investigations indicate that wastewater can be serviced through a Local Pressure Sewer (LPS) network connected to a new terminal wastewater pump station and rising main discharging to the Woodend Wastewater Treatment Plant. Civix notes that WDC has confirmed capacity exists within the WWTP for planned (50 year) growth, but that additional upgrades may be required to accommodate growth beyond that presently anticipated by the District Plan. Civix concludes that there is scope to upgrade the WWTP as necessary and identifies viable servicing and staging options capable of integrating the Project with the wider wastewater network.
 - **Potable Water Supply:** WDC has advised that the existing Woodend-Pegasus public water supply network does not currently have sufficient source or treatment capacity to service development of this scale. In response, Civix has identified a servicing strategy based on the use of the existing groundwater take consent associated with the Site together with a new water treatment and storage facility integrated with the wider network. Civix estimates that the existing consented water take volume is capable of supplying the Project's projected peak-day demand, subject to detailed design and any necessary amendments to the existing water permit.
 - **Roading and Access:** The development will utilise Pegasus Boulevard as its primary access route, with new internal roads designed in accordance with WDC standards and integrated with the surrounding transport network. The proposed road hierarchy will provide for vehicle, pedestrian and service access, while accommodating three waters and utility infrastructure within compliant corridors. Transport effects and network integration are addressed separately within the Novo Transport Assessment (**Attachment 7**).
 - **Utility Services:** Existing electricity and telecommunications infrastructure is available within and adjacent to the Site. Preliminary advice from utility providers indicates that reinforcement of local distribution networks may be required to accommodate future demand, but no material capacity constraints have been identified. Utility servicing requirements will be refined through the substantive application and detailed design stages.
135. The Civix assessment identifies a number of infrastructure and servicing matters requiring further investigation through the substantive application process, including wastewater treatment plant upgrades, water supply infrastructure, servicing staging and network integration. However, as discussed in the WDC engagement section later in this report, Civix concludes that these matters are capable of being addressed through engineering design, infrastructure upgrades and



continued engagement with WDC and other infrastructure providers. The report expressly finds that no civil engineering or infrastructure-related matters have been identified that would prevent the Project from being appropriately resolved through the substantive Fast-track process.

Contamination

136. The ENGEO Preliminary Site Investigation (**Attachment 16**) identifies potential HAIL activities associated with the former golf course operation. Potential contaminant source–pathway–receptor linkages may be present. However, the potential contaminants of concern are commonly managed or remediated using established methods, and can be appropriately investigated, assessed and (where necessary) remediated as part of the development process. A Detailed Site Investigation (DSI) will be provided at substantive stage, together with any required remediation and management plans.

Geotechnical and Natural Hazards

137. Geotechnical and natural hazard matters have been assessed by ENGEO (**Attachment 10**) and Flowstate (**Attachment 9**). The ENGEO Preliminary Geotechnical Assessment concludes that the Site is generally suitable for urban development and that there are no known geotechnical or natural hazard constraints that would preclude the proposed residential development. The assessment identifies that parts of the Site may be susceptible to liquefaction-induced settlement, potential lateral spreading in the vicinity of some pond margins, and localised consolidation settlement associated with compressible soils. However, these matters are typical of parts of North Canterbury and Greater Christchurch and can be appropriately managed through established engineering responses, including earthworks design, ground improvement, engineered fill placement and suitable foundation solutions. Further geotechnical investigations will be undertaken at the substantive stage to confirm the extent of any required mitigation measures.
138. The Flowstate Stormwater Assessment confirms that the Site lies outside the modelled Ashley River / Rakahuri breakout inundation extent and demonstrates that hydraulic neutrality can be achieved through a low-impact stormwater management system. While localised flood and drainage matters will require detailed design, no significant flood hazard constraints have been identified. Collectively, the geotechnical and natural hazard investigations conclude that identified risks can be appropriately managed through established planning and engineering measures and do not represent a barrier to the development of the Site.

Earthworks / Construction effects

139. Bulk earthworks associated with formation and shaping of residential allotments, formation of roads and installation of servicing have the potential to give rise to potential effects from dust, sediment and silt, and water erosion. As described in the Civix Engineering and Infrastructure Report (**Attachment 8**) and Flowstate Stormwater Assessment (**Attachment 9**), these effects are common and anticipated in large-scale greenfield land development and will be appropriately mitigated through standard erosion and sediment control measures, including best-practice industry standards. Other construction-related effects (such as traffic, noise and vibration) will be managed through a Construction Management Plan and a Construction Traffic Management Plan. Construction noise and vibration effects on existing noise-sensitive locations (identified in



the Powell Fenwick Acoustic Assessment at **Attachment 14**) will also be managed through those plans.

Ecological effects

140. The PDP Ecology Report (**Attachment 11**) identifies that the Site is a highly modified former golf course, with its principal ecological values associated with the Taranaki Stream, Taerutu Stream and Wai-Hora Stream corridors, together with associated wetlands, riparian vegetation, constructed ponds, treelines and areas of indigenous vegetation. The Site also provides habitat for a range of indigenous fauna, including threatened freshwater fish species, lizards, and avifauna, particularly wetland and waterbird species.
141. The assessment concludes that the Project has the potential to result in adverse ecological effects, including the loss or modification of some wetlands, constructed ponds, rank grassland and indigenous fauna habitat, as well as disturbance to freshwater fish, lizards and bird species. However, the Indicative Master Plan has been informed by ecological investigations and seeks to retain and enhance key stream corridors and most higher-value wetlands, while integrating ecological values within the wider open space, stormwater and blue-green infrastructure network.
142. The report concludes that, subject to further ecological investigations, detailed design and the application of the 'effects management hierarchy', ecological effects are capable of being appropriately avoided, minimised, remedied, offset or compensated. Indicative management measures include the protection and enhancement of waterways and wetlands, habitat creation and restoration, ecological management plans, and the implementation of species-specific mitigation measures supported by any necessary Wildlife Act or Conservation Act approvals.
143. A detailed ecological assessment and any associated management plans will be prepared and lodged as part of the substantive application process to further assess ecological effects and confirm the measures required to achieve appropriate ecological outcomes.

Archaeological and Cultural Effects

144. Engagement with Whitiara Centre Limited has confirmed that the Site forms part of a nationally significant archaeological landscape associated with Kaiapoi Pā (Te Kōhaka-a-Kaikai-a-Waro), Taerutu Gully Pā (M35/440), associated kāinga, wetlands, horticultural sites, borrow pits and broader patterns of Māori occupation extending throughout the Pegasus–Woodend area. Previous archaeological investigations undertaken during the development of Pegasus and the former golf course recorded a substantial concentration of archaeological features. The Archaeological report (**Attachment 12**) confirms that the Site forms part of a highly significant archaeological landscape associated with long-standing Māori occupation, settlement and resource use in the wider Kaiapoi-Pegasus area.
145. Recorded sites that remain at least partially in situ within the area of works include M35/440 (Taerutu Gully Pā), and M35/312 (borrow pits), but the majority of archaeological sites within the golf course have not been recorded in the NZAA site recording scheme. The archaeological assessment concludes that a number of archaeological sites and areas retain high to very high archaeological values, namely the Taerutu Gully Pā, the associated kāinga and wetland archaeological deposits to the north, and the remaining borrow pits and garden soils in the southern part of the Site. The assessment identifies these areas as the principal locations of



archaeological sensitivity within the Site and recommends their retention and protection. The indicative master plan has been informed by these findings, and the indicative design has excluded from excavation and development the main known areas of archaeological concern and in situ archaeological features (including Taerutu Gully Pā, the area to the north containing associated archaeological remains and wetland deposits, and the remaining borrow pits associated with M35/312). The Archaeological Assessment notes that this will largely prevent negative effects to the archaeological values of the sites in these areas, particularly their condition values. The archaeological assessment concludes that the exclusion of these areas from excavation and development will avoid damage to the archaeological values of the sites.

146. The Applicant acknowledges that while archaeological assessments can identify and evaluate archaeological values, the significance of cultural values and the effects of development on those values are matters that can only properly be assessed by mana whenua. The archaeological report expressly recognises that archaeological values should not be regarded as representative of cultural values and that Ngāi Tūāhuriri are best placed to comment on the cultural significance of the Site and surrounding landscape.
147. Consistent with this, cultural values have been a central focus of engagement with Whitiara Centre Limited on behalf of Te Ngāi Tūāhuriri Rūnanga (as detailed below). Through that engagement, mana whenua have identified the national and tribal significance of the area, including its history of occupation, pounamu manufacture and trade, warfare, and the presence of significant archaeological evidence associated with that history. Whitiara has emphasised the importance of protecting archaeological sites, restoring waterways and indigenous habitats, reconnecting elements of the cultural landscape, and recognising the relationship between Kaiapoi Pā, the Taranaki and Taerutu Streams, and Kaitiritiri Ridge.
148. These matters have directly informed the ongoing development of the indicative master plan, including the identification of areas proposed to be excluded from development, the retention and enhancement of stream corridors and wetland environments, the protection of identified archaeological sites and the scope of archaeological, ecological and landscape investigations undertaken to date. The Applicant recognises that Ngāi Tūāhuriri's views regarding cultural values and the appropriateness of development outcomes will continue to evolve as further information becomes available and the Project is refined. Wolfbrook is committed to ongoing engagement with Whitiara and Ngāi Tūāhuriri through both the referral and substantive Fast-track processes to ensure that cultural values remain a central consideration in the future development of the Project.

Open Space and Recreation Effects

149. The Project will result in the loss of the former Pegasus Golf Course as a golf and recreation asset. The private golf course has ceased operation and will not be reinstated.
150. The Visitor Solutions Recreation, Leisure and Open Space Memorandum (**Attachment 15**) confirms that the greatest identified recreation impact is the loss of golf on the site. That impact is felt principally by the former private club's members and visiting golfers. Because Pegasus at championship-course level is not considered commercially viable (as demonstrated by the previous liquidation), and because Clearwater offers an alternative championship-level course within a 20-minute drive, the loss to the wider network is limited. The Pegasus course was privately operated, so open-space losses affect recreational walkers, runners and dog-walkers using adjacent public walkways. The indicative masterplan provides scope to retain,



reconfigure or enhance walking and cycling connectivity, including through new or modified routes within the open space and stormwater network. The greatest potential gains are in active sport, recreation and leisure opportunities. On balance, there will likely be a net increase in active and passive sport, leisure and recreation opportunities available for the public on the Site. Effects are not considered to be 'significantly adverse' in their totality, provided appropriate mitigation is developed and confirmed through the substantive application. Visitor Solutions considers there is potential for an overall net increase in active and passive sport, recreation and leisure opportunities on the site, with the unmitigated effects being limited to the visual loss of clear open space and the ability to play golf on the site.

Effects on Highly Productive Land

151. The Reeftide Soils and Land Assessment (**Attachment 13**) concludes that the Project will not result in any loss of highly productive land and that the site does not have realistic productive potential that will be foregone.
152. The site is zoned Special Purpose Zone (Pegasus Resort) (and Mapleham Rural 4B / Rural Pegasus under the Operative Plan), none of which is equivalent to a General Rural or Rural Production zone, meaning the site does not meet the transitional definition of highly productive land under clause 3.5(7) of the NPS-HPL. Although the site comprises approximately 63.2 ha of LUC Class 2 and 13.8 ha of LUC Class 6 soils, its productive potential is materially constrained by the "red" Waimakariri Nutrient Allocation Zone under the Canterbury Land and Water Regional Plan, which caps nitrogen use at, or below, the site's low historical baseline and would materially reduce yields and profitability from any farming use.
153. Farming would also generate significant reverse sensitivity effects for adjoining residents that could not be practically mitigated through setbacks. Reeftide concludes that the Project will not compromise the productive capacity of the district or region, and will deliver a net environmental improvement (including reduced fertiliser use and improved groundwater quality) compared to both the former golf course use and any realistic alternative rural use.

Acoustic Effects

154. The Powell Fenwick Acoustic Assessment (**Attachment 14**) confirms that SH1 adjacent to the development is subject to upgrade under the Roads of National Significance programme via the Belfast to Woodend Bypass. Based on publicly available information about the Bypass proposal, the highway design (including low-noise road surfaces and solid barriers either side of the flyover lanes) is not expected to result in noise levels that would significantly impact residential use of the land. The closest edge of new residential sites proposed would be approximately at the 60 dB LAeq(24hr) contour of the new State Highway. Compliance with the PODP acoustic insulation standards for residential activities within the road noise overlay would readily be achieved. Construction noise and vibration effects, and seasonal rural activity effects on new residential dwellings, will need to be managed and can be addressed via management plans.
155. Acoustic effects are not likely to be significant and are all capable of resolution at substantive stage.



Engagement and Consultation

156. This section summarises the consultation undertaken on the project with the persons and groups referred to in s 13(4)(j) of the FTAA, together with how feedback received has informed the development of the Project, consistent with section 13(4)(k)(ii) and (ka) of the FTAA.
157. The Applicant provided notice to relevant iwi authorities, hapū, Treaty settlement entities, local authorities and administering agencies in accordance with section 11 of the FTAA. Copies of the section 11 notices and responses received are contained in **Attachments 17 and 18** respectively.
158. Section 11 notices, accompanied by a project description and supporting graphics, were issued on 24 June 2026. Responses were received from all recipients within the 20-working-day period prescribed by the FTAA, concluding on 23 July 2026, except for Waimakariri District Council and Whitiara (for Ngāi Tūāhuriri). The Applicant has also undertaken engagement with the New Zealand Transport Agency, outside the formal section 11 notification process.
159. The key matters raised through the section 11 notification process and broader engagement, and the manner in which those matters have informed the Project, are summarised below.

Te Rūnanga o Ngāi Tahu

160. Te Rūnanga o Ngāi Tahu (TRONT) advised that it defers to the relevant Papatipu Rūnanga for project-specific feedback, being Ngāi Tūāhuriri, and emphasised the importance of early and meaningful engagement with mana whenua through Whitiara Centre Limited. Te Rūnanga also noted that engagement with TRONT does not replace the need for direct engagement with the relevant Papatipu Rūnanga.
161. The Applicant has undertaken direct engagement with Ngāi Tūāhuriri through Whitiara Centre Limited, as outlined below, and will continue that engagement as the Project progresses. The Applicant acknowledges the importance of mana whenua involvement in the development of the Project and the ongoing consideration of cultural, environmental and archaeological values.

Whitiara Centre Limited on behalf of Te Ngāi Tūāhuriri Rūnanga

162. Ngāi Tūāhuriri, through Whitiara Centre Limited, is tangata whenua for the Site and the wider area. Whitiara did not provide a formal response to the section 11 notice within the prescribed period. The Applicant does not present mana whenua as supporting the Project. Ngāi Tūāhuriri's position is understood, at this stage, to be reserved and continuing to develop as further information becomes available. What the engagement to date has established is a shared set of priorities — the protection of wāhi tapu and archaeological sites, the restoration of waterways and indigenous habitats, and the reconnection of the cultural landscape associated with Kaiapoi Pā — which have directly shaped the Indicative Master Plan, including the areas excluded from development. The Applicant recognises that the significance of cultural values, and the acceptability of development outcomes, are matters for mana whenua to determine, and is committed to continued engagement through both the referral and substantive stages. Referral does not pre-empt that engagement; it enables cultural matters to be fully considered by the Expert Panel with mana whenua involvement.



163. With the context above in mind, it is noted that engagement to date has focused on cultural values associated with the Site and surrounding landscape, including the identification and protection of wāhi tapu and archaeological sites, management and enhancement of waterways and wetlands, recognition of indigenous and taonga species, stormwater management, and opportunities to express mana whenua values through the design and future development of the Project.
164. The Applicant has met with Whitiara¹⁵ on three occasions to discuss the Project and to understand matters of cultural significance to mana whenua. Particular areas of interest include the Taranaki, Taerutu and Wai Hora Stream corridors, Taerutu Gully Pā (M35/440), other recorded archaeological sites, the broader cultural landscape associated with Kaiapoi Pā, and opportunities for cultural expression through naming, interpretation, landscape treatment and ecological enhancement.
165. This engagement has informed the scope of the cultural, archaeological, ecological and stormwater investigations undertaken to date and the layout and land use composition of the proposed development. The Applicant is committed to continuing engagement and exploring partnership opportunities with Whitiara as the Project evolves and prior to lodgement of any substantive fast-track application.

Canterbury Regional Council (Environment Canterbury)

166. The Applicant met with Canterbury Regional Council (CRC) on 15 July 2026 and subsequently received a formal section 11 response dated 23 July 2026. Copies of the meeting minutes and section 11 response are included in **Attachment 18**. CRC confirmed that, given the preliminary level of project detail available, it was unable to identify the full suite of regional consent requirements at this stage. However, CRC advised that the Applicant should carefully assess the need for approvals under the Canterbury Land and Water Regional Plan, Canterbury Air Regional Plan and any relevant National Environmental Standards.
167. CRC advised that a substantive application should be supported by a comprehensive assessment of environmental effects, including technical assessments, management plans, a detailed assessment against the relevant regional planning framework, and a suite of proposed consent conditions. CRC also encouraged early sharing of draft technical reports, ecological assessments, policy analyses and draft conditions to assist with issue identification and streamline the substantive application process. CRC specifically identified stormwater, ecology, waterways, infrastructure and cultural values as areas where targeted technical engagement may be beneficial. CRC also very usefully provided a condition set for each of the likely consents required, to use in preparing a substantive application.
168. The Applicant has taken this feedback into account in the preparation of the referral application and intends to continue working collaboratively with CRC as technical investigations progress. The Applicant will continue to provide information to CRC as it becomes available and will ensure that any substantive application is supported by the level of technical information sought by CRC.

¹⁵ Noting a representative of the trustees of the Kaiapoi Pā participated attended the first of these meetings



Waimakariri District Council (WDC)

169. WDC was notified under section 11 of the FTAA, however no formal section 11 response was received. Notwithstanding, the Applicant and its consultants have engaged directly with Council officers regarding the Project, including meetings and correspondence with planning and infrastructure staff.
170. Through this engagement, Council officers identified potential constraints associated with the provision of wastewater and water supply infrastructure to service development of this scale. Council advised that the Woodend Wastewater Treatment Plant (WWTP) has capacity to accommodate the growth currently anticipated by the District Plan, subject to planned upgrades, but that additional capacity would likely be required to service growth beyond that currently anticipated. Council further advised that there is presently no additional source or treatment capacity available within the existing Woodend-Pegasus water supply scheme and that a new supply source and treatment facility would be required to service development of the Site, integrated with the existing network to provide redundancy and resilience.
171. The Applicant has considered this feedback in the preparation of the Civil Engineering and Infrastructure Assessment (**Attachment 8**). Civix confirms that, while additional infrastructure investment and detailed design work will be required, no fundamental servicing constraint has been identified that would prevent development of the Site. In relation to wastewater, Civix notes that WDC has indicated there is scope to further upgrade the Woodend WWTP if required and identifies viable servicing solutions capable of connecting the Site to the public wastewater network. The Council has confirmed that the WWTP has sufficient capacity for the current projected 50-year growth (pointing to the 50-year supply enabled in the District Plan).
172. In relation to water supply, Civix concludes that the Site benefits from an existing consented groundwater take that is expected to be capable of meeting the projected peak-day demand of the development, subject to the establishment of an associated treatment and storage facility and any necessary amendments to the existing water permit.
173. Civix concludes that the identified wastewater and water supply constraints are capable of being addressed through engineering design, network upgrades and the substantive application process. The report expressly finds that any off-site effects on wastewater and water supply infrastructure can be adequately managed through capacity upgrades and that no civil engineering or infrastructure-related matters have been identified that would prevent the Project from being appropriately resolved at the substantive Fast-track application stage. Accordingly, while infrastructure servicing will require further investigation and refinement, it does not represent an insurmountable barrier to referral or subsequent development of the Site.
174. The Applicant does not overstate the servicing position. On the Council's own advice, there is presently no additional source or treatment capacity within the Woodend-Pegasus water supply scheme, and the Woodend WWTP has capacity for currently anticipated (50 year) growth only. Servicing the Project will therefore require new water treatment and storage infrastructure and, in relation to wastewater, confirmation and (if necessary) augmentation of treatment capacity. The Civix assessment identifies viable options for both — including use of the Site's existing consented groundwater take, subject to a new treatment/storage facility and any necessary amendment to the water permit. These are engineering and staging matters capable of resolution at the substantive stage rather than fundamental constraints, but they are not yet secured, and



the Applicant will progress them through detailed design and continued engagement with the Council.

175. Planning staff also identified a range of matters that would require further consideration through the substantive Fast-track process, noting that the preliminary nature of the referral application limited the level of detailed feedback that could be provided at this stage. These matters included consistency with the Partially Operative District Plan framework, infrastructure and servicing requirements, reserve and esplanade reserve provision, ecological and environmental considerations, urban design outcomes, and compliance with relevant Engineering Code of Practice standards. The Applicant acknowledges that these are detailed design and assessment matters that will be further investigated and addressed as the Project progresses through the substantive application stage, but are also matters that have been addressed through technical expert reports that form part of the referral application.

Department of Conservation (DOC)

176. DOC provided a detailed section 11 response on 23 July 2026. The Department advised that further consideration should be given to indigenous biodiversity values, freshwater ecosystems, wetlands, streams, threatened and at-risk species, and any approvals that may be required under legislation administered by them.
177. DOC advised that Wildlife Act Authorities and Complex Freshwater Fisheries Approvals are likely to be required and identified a number of species and habitats that warrant particular consideration, including Canterbury mudfish, longfin eel, Canterbury galaxias, indigenous birds, lizards and wetland ecosystems. They also emphasised the need for ecological surveys, fish passage assessments, management plans and appropriate measures to avoid, minimise, mitigate or offset ecological effects where necessary.
178. The proximity of the Brockenhurst Wetlands stewardship area was noted and DOC advised that any works affecting public conservation land may require separate approvals under the Conservation Act 1987. DOC also highlighted the importance of considering archaeological values and engaging with Heritage New Zealand Pouhere Taonga where archaeological sites may be affected.
179. The Applicant notes that the majority of DOC's comments relate to information requirements for a substantive application and matters that can be addressed through further technical investigations and project refinement if the project is referred. These matters will continue to inform the development of any substantive application

Heritage New Zealand Pouhere Taonga (HNZPT)

180. HNZPT responded to the section 11 notification and advised that the Site forms part of a significant cultural and archaeological landscape associated with Kaiapoi Pā and Te Kohanga o Kaikai-a-Waro Wāhi Tapu. HNZPT noted the presence of recorded archaeological sites within the Project area, including Taerutu Gully Pā (M35/440) and a number of recorded middens and ovens, and advised that further archaeological material is likely to remain unidentified below ground.



181. HNZPT strongly encouraged ongoing engagement with both Ngāi Tūāhuriri and HNZPT to identify opportunities to avoid and minimise effects on archaeological sites and the wider cultural landscape.
182. The Applicant has had regard to this feedback in commissioning archaeological and cultural assessments for the Project and in developing a masterplan that recognises and responds to identified cultural and archaeological values. Engagement with HNZPT and mana whenua will continue as the Project progresses and any necessary archaeological authority will be sought as part of the substantive application process.

NZ Transport Agency / Waka Kotahi (NZTA)

183. NZTA is not an administering agency for the purposes of s 11 of the FTAA and was therefore not required to be notified under the s 11 process. Notwithstanding this, the Applicant has undertaken informal engagement with NZTA given the Site's proximity to the State Highway 1 corridor and the strategic significance of the Belfast to Pegasus Motorway and Woodend Bypass project.
184. Engagement to date has focused on ensuring that the proposed development can be appropriately integrated with the surrounding transport network and significant state highway infrastructure investment occurring in the area. Particular matters discussed include the relationship of the Project to the Belfast to Pegasus Motorway and Woodend Bypass, access arrangements to and from Pegasus Boulevard, and the potential need for any improvements or coordination at state highway interfaces.
185. The matters identified through this engagement have informed the ongoing technical assessments of the Project particularly with regard to site layout and access, transport impacts on the wider network and landscaping. The Applicant intends to continue working with NZTA as the proposal progresses to ensure that access, connectivity and integration with the wider transport network are appropriately addressed through the substantive application process, having regard to the findings of the Novo Transport Assessment (**Attachment 7**).



Conclusion

186. For the reasons set out in this Assessment, the Pegasus West Development Project satisfies the referral criteria in section 22 of the Fast-track Approvals Act 2024. The Project is a large-scale, master-planned urban development that will make a significant contribution to housing supply, housing choice and the long-term functioning of the northern Greater Christchurch urban area. It will enable up to 1,000 additional dwellings, support a broader range of housing typologies and tenures, and respond to a Council-identified shortfall in feasible housing capacity and continuing market demand within the Woodend–Pegasus growth area.
187. The Project will deliver significant regional benefits. Market Economics estimates that construction of the Project will generate approximately \$1.35 billion in gross output, \$425 million in value added (GDP) and 3,936 equivalent job years across the wider economy, together with approximately \$72 million in annual household expenditure once occupied. The Project will also support the viability of nearby centres and community infrastructure, including the Ravenswood Key Activity Centre and the concurrent Belfast to Pegasus Motorway and Woodend Bypass project.
188. The Project's benefits extend beyond housing and economic growth. It will facilitate the redevelopment of a strategically located but underutilised former golf course, provide opportunities for partnership with Ngāi Tūāhuriri, recognise and protect significant archaeological and cultural values including Taerutu Gully Pā, enhance stream and riparian corridors, and provide a wider range of publicly accessible recreation opportunities than currently exist on the Site. The Project will also support reduced greenhouse gas emissions through a consolidated, walkable and infrastructure-efficient urban form, and has the potential to deliver housing outcomes that respond to identified regional housing needs that are not currently, or are insufficiently, provided by the market.
189. The engagement undertaken to date demonstrates that the key issues relevant to the Project have been identified and are capable of being addressed through the substantive Fast-track process. Feedback from mana whenua, local authorities, administering agencies and other relevant parties has informed the development of the Project and the scope of technical investigations being undertaken. The Applicant remains committed to ongoing engagement as further project detail is developed.
190. While a number of technical, environmental and infrastructure matters require further assessment and refinement, the expert assessments prepared to date have not identified any issue that would prevent the Project from proceeding. In particular, the civil engineering, transport, stormwater, servicing, cultural heritage, archaeological and ecological matters identified can be appropriately investigated, assessed and managed through the substantive application process.
191. Referral of the Project would facilitate a comprehensive and integrated assessment of these matters by an Expert Panel, while providing a timely and coordinated pathway to consider a Project that will deliver significant regional benefits for Canterbury. The Applicant is well resourced and the Projects is well advanced, such that referral is unlikely to materially affect the efficient operation of the fast-track process. Accordingly, there are no reasons why the Pegasus West Development Project should not be referred under the FTAA.