
FAST TRACK REFERRAL APPLICATION

SHANNON FARM RESIDENTIAL AND COMMERCIAL EXTENSION

Rippon Holdings Limited and Rippon
Investments Limited

Our Reference: JW22058

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1 PROJECT OVERVIEW

1.1 INTRODUCTION

Rippon Holdings Limited and Rippon Investments Limited (**RHL&RIL**) have prepared this application for referral under the Fast-track Approvals Act 2024 (**FTAA**) for statutory approvals associated with a comprehensively master-planned, residential and commercial extension to the Shannon Farm development, in Cromwell.

This Planning Report forms part of the referral application lodged on behalf of **RHL&RIL** (s11(2) and s13(4)(w)). It has been prepared to provide additional detail and assessment in support of the prescribed Referral Application Form; and is structured to demonstrate compliance with each of the specific information requirements of Section 13 of the Fast-track Approvals Act 2024 (**FTAA**).

The proposal, referred to as the “**Shannon Farm Residential and Commercial Extension**”, will consist of the following:

- A staged subdivision of land for residential development for approximately 755 residential Lots at a range of densities;
- Approximately 5.19 hectares of light industrial commercial land;
- Approximately 3.1 hectares of retail / mixed-use commercial land;
- An interconnected network of landscaped parks and green corridors, integrated with stormwater and flood management systems; and
- Associated bulk earthworks, access, and supporting infrastructure.

The development will be carried out by Infinity Investment Group Holdings Limited on behalf of RHL&RIL¹. Infinity Investment Group Holdings Limited is a proven developer of over 25 years’ experience in land development who has delivered over 4,000 residential sections to date and has extensive expertise in the design and implementation of master planned communities throughout the Canterbury and Southern Lakes regions.

Commencement of the proposed works detailed herein are anticipated to occur as soon as practicable on receipt of approval of the application, and following completion of detailed design, engineering plans, engagement of contractors, procurement, and construction management planning. The total delivery of construction will proceed in stages across the development area and is expected to be completed within 8 to 12 years.

The proposal is anticipated to deliver substantial economic and social benefits, contributing to both immediate economic activity and the long-term growth of Cromwell. It will provide housing capacity across a range of typologies, helping to meet forecast demand and improve housing affordability by increasing market responsiveness and competition. In addition, the commercial precinct will enable a range of business activities to establish locally, supporting employment growth and economic resilience.

¹ Infinity Investment Limited is part owner of RHL&RIL.

1.2 DOCUMENT ROAD MAP

A roadmap of the relevant information to be presented in this report as required by s13(4) of the FTAA is as follows:

Criteria	Section of report	Summary
<i>Proposal and effects</i>		
(a) a description of the project and the activities it involves:	1.0 and 3.0	The proposal, referred to as the "Shannon Farm Residential and Commercial Extension", will consist of the following: • A staged subdivision of land for residential development for approximately 755 residential Lots at a range of densities; • Approximately 5.19 hectares of light industrial commercial land; • Approximately 3.1 hectares of retail / mixed-use commercial land; • An interconnected network of landscaped parks and green corridors, integrated with stormwater and flood management systems; and • Associated bulk earthworks, access, and supporting infrastructure.
(b) an explanation of how the project meets the criteria in section 22:	5.0	The proposal meets the qualifying criteria under section 22 as follows: • Delivers substantial housing supply in the order of 755 new homes. • Delivers substantial economic growth to the Region. • Consistent with the relevant Planning documents. • Consideration of this application under the FTAA would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes.
(c) information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24):	4.5	No ineligible activities (as defined in section 5) are engaged with this project.
(d) a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application:	2.1 and Figure 1	
(e) the anticipated commencement and completion dates for construction activities (where relevant):	1.0 and 3.1.9	Construction activities are anticipated to commence as soon as reasonably practicable following the grant of consent, allowing for confirmation of

		detailed design and engineering plans, engagement of contractors, procurement, and construction management planning. Construction will proceed in stages across the development area and is expected to be completed within 8 to 12 years.
(f) a statement of whether the project is planned to proceed in stages and, if so,— (i) an outline of the nature and timing of the stages; and (ii) a statement of whether a separate substantive application is to be lodged for each of the stages; and (iii) an explanation of how each stage meets the criteria in section 22:	3.1.9	The proposal will be staged with specific sequencing to be determined through the substantive application, but generally anticipated to involve stages of 50-100 lots every 12 months for the residential development. The substantive application will seek approval for subdivision and retail, mixed-use commercial and industrial land uses within the commercial precinct. Separate resource consent application(s) will be required for buildings within the commercial precinct.
(g) a statement of whether a part of the project is proposed as an alternative project in itself and, if so,— (i) a description of that part of the project; and (ii) an explanation of how that part of the project meets the criteria in section 22:	n/a	Not applicable.
(h) a description of the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects:	6.0	An assessment of the anticipated and known adverse effects of the project, as supported by independent specialists assessments, is included in Section 6.0. This includes an assessment of: • Productive capacity effects • Landscape effects • Urban Design • Infrastructure effects • Economic effects • Transport effects • Ecological effects • Natural Hazards • Iwi and cultural effects • Heritage effects • Contaminated land • Reverse sensitivity effects Overall, the anticipated and known effects of the proposal on the environment have been assessed and are considered to be acceptable, with potential impacts appropriately managed through design responses and mitigation.
(i) a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991:	4.0	No prohibited activities are proposed.

<i>Persons affected</i>		
(j) a list of the persons and groups the applicant considers are likely to be affected by the project, including— (i) relevant local authorities: (ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements: (iii) other relevant iwi authorities: (iv) relevant Treaty settlement entities: (v) relevant protected customary rights groups and customary marine title groups: (vi) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou: (vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011: (viii) Persons with a registered interest in land that may need to be acquired under the Public Works Act 1981:	7.0 and Table 5	All relevant parties have been identified and pre-application notification as required by s11 has occurred. A summary of all consultation undertaken and the resulting outcomes of that consultation is attached in Appendix [D].
(k) a summary of— (i) the consultation undertaken for the purposes of section 11(1)(a) and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and (ii) how the consultation has informed the project:	7.0 and Table 5	Notice was sent to all s11 parties on 13 April 2026. A summary of further engagement and comments received, and how this has informed the project, is contained in Appendix [D].
(ka) a summary of how any responses to a notice given under section 11(1)(b) have informed the project:	7.0 and Table 5	A summary of comments received, and how these have informed the project, is contained in Appendix [D] .
(l) a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements:	7.2	Lake Dunstan / Te Wairere is a statutory acknowledgement area recorded in the Ngāi Tahu Claims Settlement Act 1998 (s13(4)(o)). Schedule 61 of the Act sets out the cultural, spiritual, historic, and traditional associations of Ngāi Tahu with Lake Dunstan / Te Wairere. The purposes of this statutory acknowledgement are: (a) to require that consent authorities forward summaries of resource consent applications to Te Rūnanga o Ngāi Tahu as required by regulations made pursuant to section

		207 (clause 12.2.3 of the deed of settlement); and (b) to require that consent authorities, Heritage New Zealand Pouhere Taonga, or the Environment Court, as the case may be, have regard to this statutory acknowledgement in relation to Te Wairere, as provided in sections 208 to 210 (clause 12.2.4 of the deed of settlement); and (c) to empower the Minister responsible for management of Te Wairere or the Commissioner of Crown Lands, as the case may be, to enter into a Deed of Recognition as provided in section 212 (clause 12.2.6 of the deed of settlement); and (d) to enable Te Rūnanga o Ngāi Tahu and any member of Ngāi Tahu Whānui to cite this statutory acknowledgement as evidence of the association of Ngāi Tahu to Te Wairere as provided in section 211 (clause 12.2.5 of the deed of settlement). An extract of the Statutory Acknowledgement is attached in Appendix [L]. Consultation with Te Rūnanga o Ngāi Tahu has and will continue to be undertaken in accordance with their preferences as noted in their letter dated 14 May 2026 and attached in the consultation summary in Appendix [D].
(m) a description of any processes already undertaken under the Public Works Act 1981 in relation to the project:	n/a	No processes have been undertaken under the Public Works Act 1981 in relation to the project.
(n) a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019:	n/a	The Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 does not relate to the Site.
(o) information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area:	n/a	There are no parcels of Māori land, marae, and identified wāhi tapu within the project area. Consultation remains ongoing with all relevant iwi authorities.
<i>Information relating to activity that may be subject of determination under section 23 or 24</i>		
(p) a statement of whether the applicant is seeking a determination under section 23 and, if so, an assessment of the effects of the activity on the	n/a	The applicant is not seeking a determination under section 23 in that the proposal is not a linear

relevant land and on the rights and interests of Māori in that land:		infrastructure activity on identified Māori land.
(q) a statement of whether the applicant is seeking a determination under section 24(2) and, if so, a description of— (i) the scale and adverse effects of the existing electricity infrastructure; and (ii) how, if at all, that scale or those adverse effects are anticipated or known to change as a result of the maintenance, upgrading, or continued operation of the infrastructure:	n/a	The applicant is not seeking a determination under section 24(2) in relation to existing electricity infrastructure.
(r) a statement of whether the applicant is seeking a determination under section 24(4) and, if so,— (i) a description of every alternative site considered by the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) for the construction and operation of the new electricity lines (the activity); and (ii) for each alternative site considered,— (A) a statement of the anticipated and known financial cost of undertaking the activity; and (B) a description of the anticipated and known adverse effects of undertaking the activity; and (C) a description of the anticipated and known financial cost and practicality of available measures to avoid, remedy, mitigate, offset, or compensate for the anticipated and known adverse effects of the activity; and (D) a description of any issues (including financial cost) that would make it impractical to undertake the activity on the site; and (E) an assessment of whether it would be reasonable and practical to undertake the activity on the site, taking into account the matters referred to in subparagraphs (A) to (D) and any other relevant matters:	n/a	The applicant is not seeking a determination under section 24(4) in relation to new electricity lines.
<i>What is needed to complete project</i>		
(s) a description of the applicant's legal interest (if any), or if the referral application is lodged by more than 1 person, the legal interest of any of those persons (if any), in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work:	2.3.2	The Project site is either owned by the applicants (RHL & RIL), their subsidiary, or the directors of RIL.
(t) an outline of the types of consents, certificates, designations, concessions, and other legal	4.0	The proposal will require several resource consents and approvals

authorisations (other than contractual authorisations or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant:		including, but not limited to, approvals under the following statutory documents: • Resource Management Act 1991 • Central Otago District Plan; • Otago Regional Plan: Water for Otago; • Otago Regional Plan: Waste Plan • Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 • Wildlife Act 1953 It is noted that the full list of resource consents required will be finalised through the FTAA substantive application process if the project is referred. No prohibited activities are required to be sought. Modification of consent notices and easements may require approvals under s211 and s243(e) RMA and will be pursued outside of the FTAA process. Relevant consent notices and easements are addressed in Appendix [M].
<i>Other matters</i>		
(u) whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,— (i) if an application has been made, details of the application: (ii) if a decision has been made, the outcome of the decision and the reasons for it:	n/a	No previous application for this proposal has been made.
(v) a description of whether and how the project would be affected by climate change and natural hazards:	6.1.8 and 8.1.2	Preliminary hazard assessment concludes that natural hazard risks are either low or can be effectively mitigated through standard engineering and design responses, and do not represent a barrier to the proposed development.
(w) if the referral application is lodged by more than 1 person, a statement of each proposed approval to be held by each of those persons:	2.3.2	The approvals will be held by RHL&RIL.
(x) a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the referral application is lodged by more than 1 person, any of those persons) under a specified Act:	4.4	There has been no compliance or enforcement action taken against the applicant. Otago Regional Council's Compliance team notes that an abatement notice was issued against New Zealand Cherry Corp

		(Leyser) LP (a subsidiary of RHL&RIL) in relation to the Shannon Farm rural lifestyle development adjacent to the application site. The abatement notice was issued on 27 September 2024, where there was non-compliance with consent conditions or rules requiring works to cease and/or where remediation was required. Following prompt corrective actions, this abatement notice was cancelled.
<i>Matters relating to specific proposed approvals</i>		
(y) if the proposed approvals include— (i) an approval described in section 42(4)(a) or (d) (resource consent or designation), the information specified in clause 2 of Schedule 5: (ii) an approval described in section 42(4)(b) (change or cancellation of resource consent condition), the information specified in clause 3 of Schedule 5: (iii) an approval described in section 42(4)(c) (certificate of compliance), the information specified in clause 4 of Schedule 5: (iv) an approval described in section 42(4)(e) (concession), the information specified in clause 2 of Schedule 6: (v) an approval described in section 42(4)(f) (land exchange), the information specified in clause 23 of Schedule 6: (vi) an approval described in section 42(4)(a) or (d) in relation to a project that includes a standard freshwater fisheries activity, the information specified in clause 4A of Schedule 5: (vii) an approval described in section 42(4)(j) (complex freshwater fisheries activity approval), the information specified in clause 2 of Schedule 9: (viii) an approval described in section 42(4)(k) (marine consent), the information specified in clause 2 of Schedule 10: (ix) an approval described in section 42(4)(l) or (m) (access arrangement), the information specified in clause 2 of Schedule 11: (x) an approval described in section 42(4)(n) (mining permit), the information specified in clause 15 of Schedule 11.	8.0	The proposed approvals are resource consents (as well as a wildlife permit). A full assessment of the relevant NPS and NES has been undertaken. Overall, the proposal is considered to be consistent with the relevant documents (clause 2(1)(a)). There are no existing resource consents of the kind referred to in section 30(3)(a) (clause 2(1)(b)).

2 SITE OVERVIEW (s13(4)(d))

In accordance with section 13(4)(d) of the Fast-track Approvals Act 2024, this section provides a description of the site and its surrounding context.

2.1 SITE DESCRIPTION

The subject site (the **Site**) is located on the north-western edge of Cromwell, within the Central Otago District. It sits at the junction of State Highway 6 and Ripponvale Road, directly across the road from the Medium Density Residential Zone of the Cromwell township. The site is approximately 1,200 metres from Cromwell's town centre. An aerial image detailing the Site location is as follows:



Figure 1: Aerial image detailing location of subject site relative to the Cromwell township.

The Site spans an area of approximately 70 hectares of contiguous land, legally described as follows:

- Lot 2, 4 Deposited Plan 420009 held in Record of Title 476974 (2.68 hectares);
- Lot 1, 3 Deposited Plan 420009 held in Record of Title 476973 (6.00 hectares);
- Lot 1 Deposited Plan 344529 held in Record of Title 182714 (8.00 hectares);
- Lot 2 Deposited Plan 344529 held in Record of Title 182715 (8.00 hectares);
- Lot 3 Deposited Plan 344529 held in Record of Title 182716 (8.00 hectares);
- Lot 4 Deposited Plan 344529 held in Record of Title 182717 (8.00 hectares); and
- Lot 1000 DP 61599 held in Record of Title 1233739 (233.18 hectares)²

The Site has been the subject of an intensive cherry orchard, progressively established over the site since 2004. The Site is predominantly planted, with approximately 62.4 hectares of

² Only a portion of this Title will be subject to the Project as described herein. This Title is currently undergoing change as the consented Shannon Farm residential development progresses.

cherries, of which 38 hectares is covered with 6-metre-tall protective netting. The Site currently contains two irrigation ponds, operational buildings and an area for a seasonal workers camp site. No indigenous vegetation communities were recorded across the site.

Topographically, the Site is generally flat to gently sloping from northwest to southeast, with elevations ranging from a maximum elevation of 260 masl to a minimum of 218 masl. There are no natural freshwater bodies on the site.

Under the Central Otago District Plan, the Site is predominantly zoned **Rural Resource Area**, with a small portion of land towards the east located within the subzone of the Rural Resource Area as **Rural Residential Notation** (outlined in red). The Site is not subject to any Heritage and Culture, or Landscape notations³. In addition, the ArchSite database does not record any archaeological sites within the Site.

The Central Otago District Plan does not identify any natural hazards affecting the Site. The Otago Regional Council Natural Hazard Database identifies the Site as low to none liquefaction risk (A Domain), and records the presence of dormant alluvial fans and floodwater dominated alluvial fans.

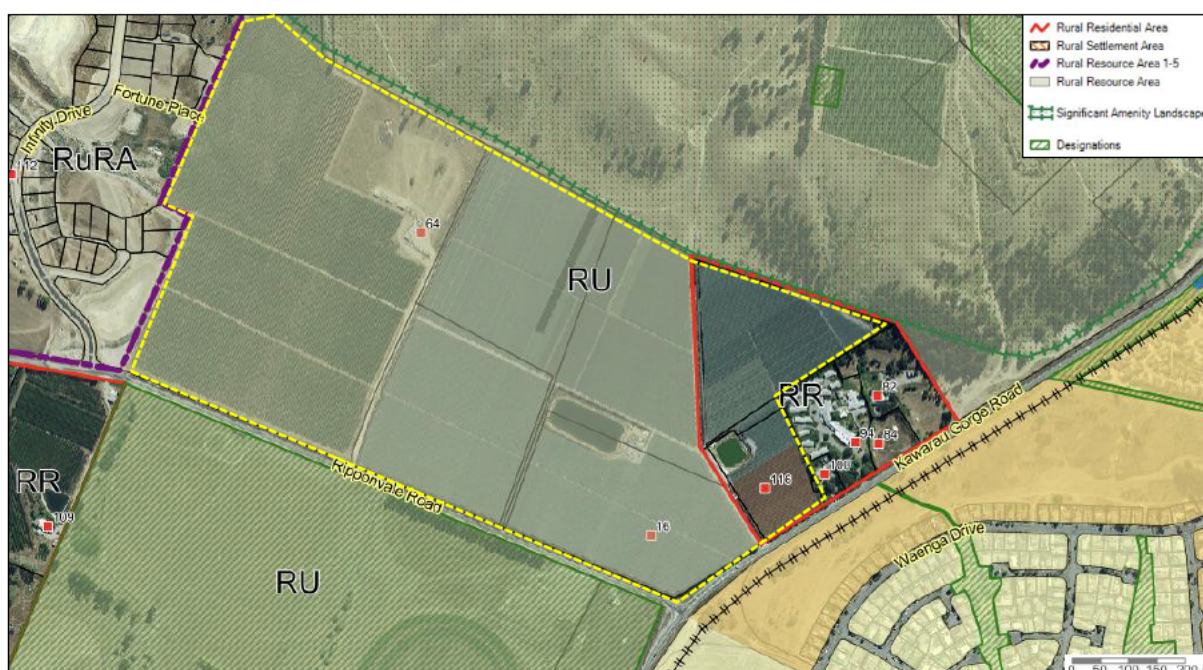


Figure 2: Extract of CODC District Plan map. The approximate extent of the site is as shown in yellow.

2.2 SURROUNDING ENVIRONMENT

The surrounding environment is characterised by a range of land uses and activities.

To the west of the Site is the Shannon Farm rural residential subdivision, which is consented for up to 160 residential allotments and is currently under development. A further 44 Lots are currently being sought via resource consent. This development is being facilitated by New Zealand Cherry Corp (Leyser) LP, a subsidiary of RHL&RIL. This development involves the

³ In terms of the Central Otago District Planning maps.

establishment of a pedestrian walkway along Ripponvale Road and adjacent to the Site, which will connect to a new underpass to be installed (as a requirement for the Shannon Farm development) under State Highway 6 (SH6), providing pedestrian connectivity to the wider Cromwell township.

The southern extent of the Site is bordered by Ripponvale Road, with the Cromwell Racecourse and a small area of the Aerodrome Reserve⁴ located on the opposite side of the road. The eastern extent is bordered by SH6, with the existing urban area (zoned Medium Density Residential) of Cromwell located on the other side of the highway. The Ripponburn Rest Home is adjacent on the eastern boundary of the Site.

The northern extent of the Site is bordered by a private rural landholding comprised of approximately 107 hectares of predominantly low intensity dryland grazing. The land is characterised by a terrace riser and identified as a Significant Amenity Landscape in the District Plan (depicted by  in Figure 2 above).

2.3 LAND OWNERSHIP AND TITLE INTERESTS

2.3.1 Record of Titles

The Site spans an area of approximately 70 hectares of contiguous land, legally described as follows:

- Lot 2, 4 Deposited Plan 420009 held in Record of Title 476974 (2.68 hectares);
- Lot 1, 3 Deposited Plan 420009 held in Record of Title 476973 (6.00 hectares);
- Lot 1 Deposited Plan 344529 held in Record of Title 182714 (8.00 hectares);
- Lot 2 Deposited Plan 344529 held in Record of Title 182715 (8.00 hectares);
- Lot 3 Deposited Plan 344529 held in Record of Title 182716 (8.00 hectares);
- Lot 4 Deposited Plan 344529 held in Record of Title 182717 (8.00 hectares); and
- Lot 1000 DP 61599 held in Record of Title 1233739 (233.18 hectares)

A copy of the Titles are attached in **Appendix [A]**.

2.3.2 Land ownership and Legal Interest

Section 13(4)(s) requires a description of the applicant's legal interest (if any), in the land on which the project will occur.

The land parcels which comprise the Site are either owned by RHL&RIL, its subsidiary (New Zealand Cherry Corp (Leyser) LP), or the directors of RIL. A summary of the relevant registered proprietor of the subject Titles is as follows:

Table 1: Registered Proprietors.

Title	Legal Owner
Lot 2, 4 Deposited Plan 420009 held in Record of Title 476974	Henry Theodore Van Der Velden, Pamela Faye Van Der Velden and Neil Christopher MacDonald

⁴ Both designated in the District Plan with Central Otago District Council listed as the Requiring Authority.

Lot 1, 3 Deposited Plan 420009 held in Record of Title 476973	Henry Theodore Van Der Velden, Pamela Faye Van Der Velden and Neil Christopher MacDonald
Lot 1 Deposited Plan 344529 held in Record of Title 182714	Rippon Holdings Limited as to a 1/2 share Rippon Investments Limited as to a 1/2 share
Lot 2 Deposited Plan 344529 held in Record of Title 182715	Rippon Holdings Limited as to a 1/2 share Rippon Investments Limited as to a 1/2 share
Lot 3 Deposited Plan 344529 held in Record of Title 182716	Rippon Holdings Limited as to a 1/2 share Rippon Investments Limited as to a 1/2 share
Lot 4 Deposited Plan 344529 held in Record of Title 182717	Rippon Holdings Limited as to a 1/2 share Rippon Investments Limited as to a 1/2 share
Lot 1000 DP 61599 held in Record of Title 1233739	New Zealand Cherry Corp (Leyser) LP

2.3.3 Consent notices and easements

There will be a suite of variations or cancellations required to existing consent notices and easements as noted in the Title review attached in **Appendix [M]**. These will be sought separately to the FTAA application, via standard Council processes.

3 PROJECT DESCRIPTION (s13(4)(a))

In accordance with section 13(4)(a) of the Fast-track Approvals Act 2024, this section provides a description of the project and the activities it involves.

3.1 OVERVIEW

RHL&RIL are seeking approval under the FTAA to enable development of a master-planned urban community on the Site. The proposal provides for a mix of residential, commercial (including retail, offices, professional services and food and beverage), and light industrial development, supported by open space, blue-green networks, and local transport connections.

Further details of the proposal is described in detail as follows:

3.1.1 Cessation of cherry orchard

Based on the declining performance of the cherry business and industry generally since 2019 (as will be detailed later in this report), the decision was made to cease full operation of the orchard, effective from 31 March 2026.

3.1.2 Overall layout

The overall development layout is detailed within the Masterplan attached in **Appendix [B]**, an extract of which is included below.

The proposal seeks to provide for a commercial precinct (consisting of both a light industrial and general mixed-use commercial development) near the south-eastern corner of the Site adjacent to the intersection of SH6 and Ripponvale Road. The balance of the Site would be developed for residential purposes (of varying densities) with associated greenways, stormwater catchments and roading.

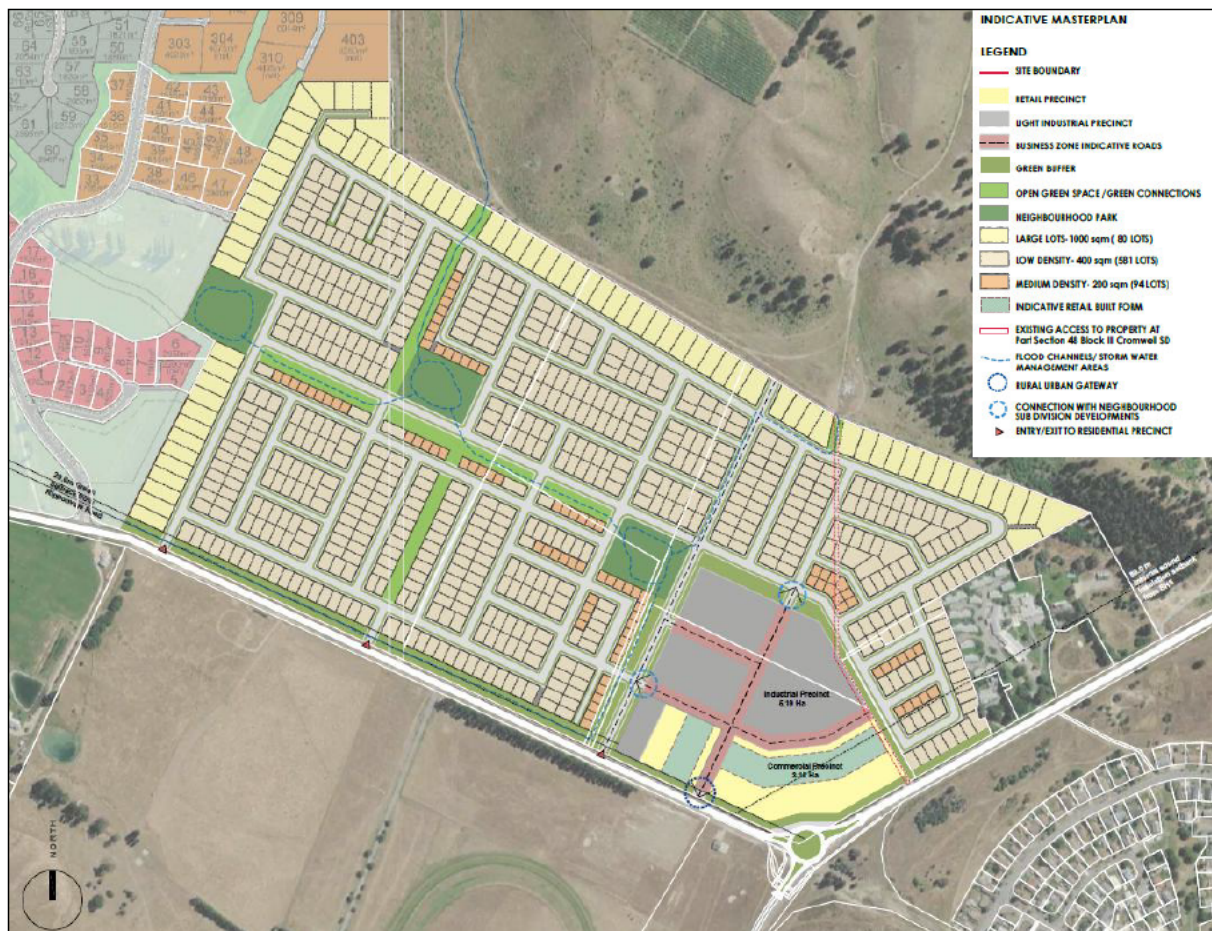


Figure 3: Overall indicative masterplan layout.

3.1.3 Residential subdivision

In terms of the residential aspects of the proposal, three different typologies are promoted, consistent with the existing residential densities in the Central Otago District Plan (these being, Large Lot Residential, Low Density, and Medium Density). The indicative masterplan is divided up as follows:

- Approximately 80 “Large Lot Residential” allotments located along the northern and western fringes of the Site with a minimum lot size of 1,000m²;
- Approximately 581 “Low Density Residential” allotments located internally of the Site, with a minimum lot size of 400m²;
- Approximately 94 “Medium Density Residential” Allotments located along key reserve networks, with a minimum lot size of 200m².

The subdivision will be implemented in stages, the sequencing of which will be largely informed by the detailed design of infrastructure.

The residential Lots will be subject to a suite of design controls, including:

- Setbacks;
- Height; and

- Building coverages.

3.1.4 Commercial precinct

This application seeks for the necessary approvals to undertake the various commercial activities generally.

The proposal seeks to establish a commercial precinct in the south-easternmost corner of the site and positioned on the primary movement spine of the site. The commercial precinct will consist of a combination of light industrial (approximately 5.19 hectares) and mixed-use commercial (such as retailing, food and beverage, commercial services and professional services) (approximately 3.10 hectares).

This precinct will form a local centre providing services and amenities for the future residents of the subdivision and the wider Cromwell community generally. Future, separate resource consents will be sought for the development of specific buildings once specific commercial tenancies have been confirmed.

3.1.5 Parks and reserves

The proposal incorporates a cohesive blue-green network that forms the structural backbone of the neighbourhood. A series of centrally located parks create a clear recreational spine aligned with key east–west movement routes, while interconnected green corridors follow natural land contours which will integrate with stormwater and flood management systems.

Along Ripponvale Road, a 20 metre wide landscaped buffer performs multiple roles. It provides screening for the residential and commercial area, visual amenity for the development when viewed from the road and the shared walking and cycling path to be constructed as part of the Shannon Farm development, and accommodates the existing stormwater channel that conveys water from higher ground above Ripponvale Road. The width of this buffer allows for appropriate planting, safe conveyance of stormwater and an enhanced green edge that defines the interface between the new neighbourhood and the surrounding landscape.

Along the south-eastern boundary of the site adjoining the State Highway (SH6), it is proposed to establish a 10m wide landscape buffer. The landscape buffer will incorporate some gentle mounding and exotic trees to provide a park-like edge. There will be a 20m building setback from the SH6 boundary within the commercial area. There will be a 15m building setback from the SH6 boundary adjacent to the residential zone.

There will be no defined, landscaped separation between the Site and Ripponburn Home and Hospital (**Ripponburn**), beyond what exists within the Ripponburn site itself. There will be approximately 21 LDRZ lots along the Site/Ripponburn interface replacing the horticultural working landscape with residential development.

3.1.6 Roading and transport

The proposal includes the establishment of an internal roading network designed to integrate with the wider transport network. The roading layout will be developed in general accordance with Council standards and the relevant Code of Practice, ensuring appropriate levels of safety, functionality, and connectivity for future residents and users. The proposal will seek to close an existing access onto SH6, consolidating all traffic to Ripponvale Road.

Beyond the Site, an upgrade of the Ripponvale Road/SH6 intersection will be required, with a roundabout design anticipated. Initial considerations of the roundabout design indicate that it could be accommodated within the existing designation and additional land from the Site. It is otherwise anticipated that traffic generated from the Site can be safely and efficiently accommodated within the existing network.

As previously noted, the Shannon Farm rural lifestyle development requires provision of a shared walking and cycleway along Ripponvale Road adjacent to the Site, and an underpass under SH6 to connect to the existing urban area of Cromwell.

3.1.7 Infrastructure and three waters

An assessment in relation to the Three Waters Feasibility (Three Waters Feasibility Report) of the development has been undertaken by Hadley Consultant's Limited, and is attached in **Appendix [C]**. The Three Waters Feasibility Report confirms that the development can be serviced for potable water, wastewater, and stormwater through a combination of existing network connections, targeted infrastructure upgrades, and staged delivery of development in coordination with anticipated infrastructure upgrades.

In relation to potable water supply, the development will connect to the existing CODC water supply network, supported by new reservoir infrastructure associated with the expanded Shannon Farm reservoir site already vested in Council ownership. Preliminary assessments confirm that CODC's existing water abstraction consents retain substantial available capacity, with current usage estimated at approximately 50% of consented allocation. While some localised reticulation constraints have been identified, these can be addressed through targeted network upgrades and renewal works. Internal reticulation and reservoir infrastructure within the development will manage peak flows and firefighting requirements without materially affecting the wider network. The Three Waters Feasibility Report notes that whilst the ultimate average and peak daily demands calculated are not insignificant, it is important to note that the ultimate demands will develop to these peak levels over a period of 8 to 12 years, thereby allowing progressive headworks upgrades to meet demand. This is a typical eventuality across any Council network with an increasing population.

For wastewater servicing, the proposal will connect to the existing CODC wastewater network east of State Highway 6. Preliminary investigations have identified that some downstream reticulation upgrades and future wastewater treatment plant capacity improvements will be required to accommodate long-term growth. CODC has already identified and budgeted for wastewater treatment upgrades through its Long Term Plan. The staged nature of the development allows sufficient lead-in time for required infrastructure upgrades and network improvements to be implemented progressively ahead of demand.

Stormwater management has formed a key component of the master planning process and has been informed by detailed catchment modelling using TUFLOW software. The stormwater solution proposed in the Three Waters Feasibility Report involves detention, attenuation, conveyance and treatment measures within the subject site and adjacent Shannon Farm development. The proposed stormwater management system integrates open channels, landscaped detention areas, and green corridors into the overall subdivision design. The proposed stormwater solution also involves the construction of a new inlet and sub-surface pipeline from Ripponvale Road, south along SH6 and then along McNulty Road

and Barry Avenue to a discharge point at the Kowarau River. Preliminary design work involving hydraulic analysis and pipe long section development has been completed to confirm the feasibility of the proposed stormwater management solution. The modelling confirms that, with the proposed mitigation measures in place, the development will not increase flooding effects on neighbouring properties during significant rainfall events. The proposed solution also provides an opportunity to improve existing downstream flooding issues within the wider catchment through new stormwater infrastructure extending south toward the Kowarau River.

3.1.8 Earthworks

Site wide bulk earthworks will be necessary for the purposes of establishing the internal roading network, flow paths, infrastructure and general site development works. All works will be undertaken in accordance with an Environmental Management Plan (EMP) detailing appropriate sediment and erosion control measures, stormwater management and general site controls, as typical with large scale developments. The requirement for an EMP is to form a condition of consent.

3.1.9 Commencement and Staging

The anticipated commencement of the works will occur as soon as reasonably practicable following detailed design, engineering approvals, engagement of contractors, procurement, and construction management planning.

The total delivery construction will be managed in stages across the development area and is expected to be completed within 8 to 12 years.

Two preliminary development uptake scenarios are detailed in the Three Waters Feasibility Report including a “fast” uptake whereby completion of the development occurs within 8 years, to a “slow” development whereby full completion would be achieved over 12 years. Both scenarios detail suggested sequencing, which will be considered further through the Substantive Application, but is generally anticipated to involve stages of 50-100 residential Lots every 12 months.

A single substantive application will seek approval for subdivision, all residential development, and the enablement of retail/commercial and industrial land uses within the commercial precinct. Separate resource consent application(s) will be required for the final/specific buildings within the commercial precinct as this is developed. Confirmation that retail/commercial and industrial land uses are enabled by land use consent in this location will provide development certainty for the applicant and future tenants, supporting and enabling efficient progression through the final stage of consenting.

3.2 SUPPORTING INFORMATION

This report, and the Project overall, has been informed by expert input as follows:

- Landscape and Urban design assessment, prepared by Rough Milne Mitchell
- Productive Capacity Assessment, prepared by The AgriBusiness Group
- Ecological Impact Assessment, prepared by e3Scientific
- Preliminary and Detailed Site Investigation, prepared by e3Scientific
- Three Waters Feasibility Assessment, prepared by Hadley's Consultants

- Transportation Assessment, prepared by Carriageway Consulting Ltd
- Economics Assessment, prepared by Insight Economics Limited
- Natural Hazards Assessment, prepared by Geosolve Ltd

4 PROPOSED APPROVALS REQUIRED

In accordance with sections 13(2)(d), 13(3) and 13(4)(t) of the Fast-track Approvals Act 2024, this section outlines the approvals likely required under the various legislative framework to enable the Shannon Farm Residential and Commercial Extension.

The proposal will require a number of resource consents and approvals including, but not limited to, approvals under the following statutory documents:

- Resource Management Act 1991.
- Central Otago District Plan.
- Otago Regional Plan: Water for Otago.
- Otago Regional Plan: Waste Plan.
- Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011
- Resource Management (National Environmental Standard for Freshwater) Regulations 2020.
- Wildlife Act 1953.

A list of anticipated approvals to be sought is outlined below, and it is noted that these will be finalised through the FTAA substantive application process if the project is referred. No prohibited activities are required to be sought.

The proposal will also require a suite of variations and cancellations to consent notices and easements, as typically required under Sections 221 and 243(e) of the RMA, and as summarised in **Appendix [M]**. These approvals will be sought outside of the FTAA application, using standard Council processes.

4.1 Resource Management Act 1991

Resource consents that would otherwise be applied for under Section 104 of the Resource Management Act are required to enable the development, as discussed further below.

4.1.1 Central Otago District Plan

Under the Central Otago District Plan, the Site is predominantly zoned **Rural Resource Area**, with a small portion of land towards the east located within the subzone of the Rural Resource Area as **Rural Residential Notation**. In light of this zoning, the likely consents being sought for this application under the Central Otago District Plan includes:

4.1.1.1 Subdivision consent

- A **non-complying activity** pursuant to Rule 4.7.5(iii) for the subdivision of land that does not comply with the minimum and average allotment size criteria for Lots in the Rural Resource Area and Rural Residential Notation.

4.1.1.2 Land use consent

Land use consents will be required under the Central Otago District Plan to, but not limited to:

- Enable residential activities to occur on each of the proposed residential allotments recognising that the underlying zoning remains either Rural Resource Area or Rural Residential Notation. This requires a **discretionary activity** consent pursuant to Rule 4.7.4.i for residential activities.
- Enable a suite of departures from the development standards under Rule 4.7.6 which are collectively assessed as a **restricted discretionary activity** including, but not limited to:
 - Internal setbacks
 - Road setbacks
 - Separation distances
 - Exterior colours
 - Skyline breaches.
- Enable a suite of commercial activities to occur (including retailing) within the proposed commercial precincts that would otherwise represent a departure from the commercial activities permitted in the Rural Resource Area and Rural Residential Notation. This requires a **discretionary activity** consent pursuant to Rule 4.7.4.i for a breach to Standard 4.7.6.B.b.i and 4.7.6.B.b.ii as it relates to any activity involving commercial activities.
- Enable bulk earthworks across the site. These require both a **discretionary (restricted) activity** consent pursuant to Rule 4.7.3.vi for a breach to Standard 4.7.6.J.a for earthworks associated with road formation, and a **discretionary activity** pursuant to Rule 4.7.4.i for a breach to Standard 4.7.6.J.b for a breach to the permitted earthworks volume (3000m²) and area (2000m²).

4.1.2 Otago Regional Plan: Water for Otago

A suite of consents will be required under the Otago Regional Plan: Water for Otago, including, but not limited to, the following:

- To authorise bulk residential earthworks across the site.
- To authorise the discharge of stormwater and contaminants to land and water as it relates to earthworks.
- To authorise the diversion of water associated with construction works and the provision of new stormwater channels.
- The construction of culverts, if required.

4.1.3 Otago Regional Plan: Waste

A suite of consents will be required under the Otago Regional Plan: Waste, including, but not limited to, the following:

- To enable earthworks and site disturbances to occur on contaminated land (areas identified as having had HAIL⁵ activities occur).
- Discharge of dust suppressants

4.1.4 Otago Regional Plan: Air

The Regional Plan: Air for Otago (RPAir) may also apply with regard to discharges to air associated with the activities, including, but not limited to:

- Domestic heating appliances and outdoor burning
- The discharges of contaminants to air from building and construction activities

4.1.5 Other Rules

This application also seeks any other resource consent approvals which may be necessary to implement the project, but which are not detailed above. These will be confirmed once the substantive application has been finalised.

4.2 Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011

The proposal will require consideration under the *Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011* (NES-CS) for the following:

- A controlled activity for a change in land use from horticultural to residential and commercial.
- Consideration for soil disturbance of potentially contaminated soils.

4.3 Wildlife Act 1953

The proposal requires approval under section 53 of the Wildlife Act 1953 for the handling or incidental harm of indigenous lizards that may be present within the site.

As identified in the EIA, earthworks and vegetation clearance will directly affect areas occupied by McCann's skink. While this species is Not Threatened, it is protected under the Wildlife Act 1953, and disturbance effects are therefore managed on a compliance basis rather than due to ecological significance. A Wildlife Act Authority will be required for disturbance of this species, and it is recommended that a Lizard Management Plan be prepared by a suitably qualified Herpetologist and implemented prior to any works within lizard habitat on site.

⁵ Hazardous Activity and Industries List.

As per Section 11 of the Fast Track Approvals Act 2014, the Applicant has undertaken pre-lodgement consultation with Department of Conservation (DoC) being the relevant administering agency for approvals under the Wildlife Act 1953. Comments and consideration of comments is detailed in the Consultation Summary in **Appendix [D]**.

4.4 Compliance and Enforcement Matters (s13(4)(x))

There has been no compliance or enforcement action taken against the applicants.

A subsidiary of the applicants, New Zealand Cherry Corp (Leyser) LP, is the holder of consents for the development of the adjacent Shannon Farm subdivision. An abatement notice was issued by Otago Regional Council to New Zealand Cherry Corp (Leyser) LP on 27 September 2024 in relation to non-compliance with consent conditions or rules requiring works to cease and/or where remediation was required.

New Zealand Cherry Corp (Leyser) LP promptly (within four weeks) implemented the corrective actions required under the Abatement Notice, and the matter was formally confirmed as closed by Otago Regional Council on 29 October 2024.

4.5 Ineligible Activities – (s13(4)(c))

Ineligible activities are defined under Section 5 of the FTTA, and include:

- Any activity that would occur on Māori land and has not been agreed to in writing by the owners, or is subject to a determination under (s5(1)(a));
- Any activity that would occur within a customary marine title area without written agreement of the title group (s5(1)(b));
- Any activity that would occur within a customary rights area and would have a more-than-minor adverse effect on the exercise of protected customary rights, without written agreement of the rights group (s5(1)(c));
- Any activity that would occur on Māori customary land or land set aside as a Māori reservation under Section 4 of Te Ture Whenua Māori Act 1993 (s5(1)(d));
- An aquaculture activity, or an activity incompatible with aquaculture (s5(1)(e));
- An activity that requires access arrangements under the Crown Minerals Act 1991 (s5(1)(f) and (h));
- Any prevented activity as defined in the Act (s5(1)(g));
- An activity occurring on a national reserve or a reserve held under the Reserves Act 1977 (s5(1)(i), (j) and (k));
- An activity prohibited under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or the Resource Management Act 1991 (s5(1)(l));
- A decommissioning-related activity (s5(1)(m)); and
- An offshore renewable energy project (s5(1)(n)).

The proposed development does not involve any of the above ineligible activities. Accordingly, the proposal is considered to be eligible for referral under the FTTA.

5 DEVELOPMENT PROJECT WITH SIGNIFICANT REGIONAL OR NATIONAL BENEFIT

In accordance with section 13(4)(b) and section 22(1)(a) of the Fast-track Approvals Act 2024, this section outlines how the proposal will contribute to significant regional or national benefits.

Section 22 requires the following:

(1) The criteria for accepting a referral application are that—

(a) the project is an infrastructure or development project that would have significant regional or national benefits; and

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

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

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

...

(2) For the purposes of subsection (1)(a), the Minister may consider—

(a) whether the project—

(i) has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list:

(ii) will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure:

(iii) will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020):

(iv) will deliver significant economic benefits:

(v) will support primary industries, including aquaculture:

(vi) will support development of natural resources, including minerals and petroleum:

(vii) will support climate change mitigation, including the reduction or removal of greenhouse gas emissions:

(viii) will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards:

(ix) will address significant environmental issues:

(ixa) will promote competition in the grocery industry:

(x) is consistent with local or regional planning documents, including spatial strategies:

(b) any other matters the Minister considers relevant.

5.1 Significant Regional and National Benefits - (s22)(1)(a))

With reference to the matters identified at section 22(2)(1)(a) of the FTAA, the proposal is a development project that will have significant regional and national benefits for the following reasons.

5.1.1 Increase Housing Supply (s22(2)(a)(iii))

Pursuant to Section 22(2)(a)(iii), the Minister may consider whether the project will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020).

As assessed by Insight Economics in their Economics Report, attached in **Appendix [E]**, Cromwell's population has grown strongly over an extended period, more than trebling from 3,510 in 1996 to 10,910 in mid-2025. The Economics Report notes that under the medium growth scenario, Cromwell's population is expected to grow by 69 percent over the 30 years to 2048, and by 93 percent under a high scenario. These forecast growth rates far exceed the rest of the district, where the population is expected to grow by only 33 percent under the medium scenario.

The proposal would enable approximately 755 new dwellings, representing a substantial increase in residential development capacity within the district. In quantitative terms, this scale of development is well beyond what is typically delivered through conventional subdivision activity in New Zealand urban environments. Comparative subdivision data as presented in the Economics Report demonstrates that most residential subdivision consents create only a small number of additional lots, with developments exceeding 100 lots being relatively uncommon. Against this context, the proposal constitutes a significant increase in housing capacity.

The increase in housing supply is particularly relevant given ongoing affordability pressures within the district. Current affordability indicators demonstrate a substantial disconnect between household incomes and housing costs, with median house prices remaining significantly above traditional affordability benchmarks and mortgage servicing costs consuming a high proportion of household income. Increasing housing supply at this scale is therefore likely to improve market responsiveness to population and demand growth over time, which in turn assists in moderating housing cost escalation relative to a constrained supply scenario.

This proposal for increased housing supply also contributes positively to a well-functioning urban environment, consistent with Policy 1 of the National Policy Statement on Urban Development 2020. In particular, it supports the provision of sufficient development capacity to meet expected housing demand, facilitates urban growth in a consolidated and planned manner, and promotes efficient use of urban land and infrastructure. By enabling a

substantial number of dwellings within the Cromwell urban environment, the proposal assists in ensuring that housing supply can respond to changing community needs and population growth over time.

Overall, the proposal is considered to meet the qualifying criteria under s22(2)(a)(iii) by delivering a significant uplift in housing supply and development capacity, while also contributing toward improved housing affordability outcomes and a more responsive and well-functioning urban environment.

5.1.2 Economic Benefit (s22(2)(a)(iv))

Pursuant to Section 22(2)(a)(iv), the Minister may consider whether the project will deliver significant economic benefits.

The proposed development is underpinned by strong projected population growth in Cromwell, which is expected to significantly outpace the wider district and reinforces the town's role as a key growth node. In response, the proposal delivers substantial short-term economic benefits through the planning, development and construction phase, estimated to include employment for approximately 316 full-time workers over an eight-year period, \$216 million in wages and salaries, and an estimated \$365 million contribution to GDP.

Over the longer term, the development provides a significant uplift in housing supply through approximately 755 new dwellings, helping to address projected demand and improve housing affordability by increasing market responsiveness and competition. This is particularly important given ongoing affordability pressures within the district.

In addition, the provision of light industrial and retail/commercial land enables a range of business activities to establish locally, supporting economic resilience and employment opportunities. The projected growth in Cromwell's retail demand indicates capacity for around 24,270 m² of additional core retail floorspace by 2048 under a medium growth scenario, rising to around 29,650 m² under a high scenario. The proposal would assist in meeting this identified demand. Overall, the proposal generates substantial economic and social benefits, supporting both immediate economic activity and the long-term growth, functionality, and affordability of Cromwell.

On this basis, the proposal is considered to deliver significant economic benefits and therefore meets the qualifying criteria under s22(2)(a)(iv).

5.2 Consistent with Local Planning Documents (s22(2)(a)(x))

Pursuant to Section 22(2)(a)(x), an assessment against the relevant local and regional planning documents, and spatial strategies to determine consistency has been undertaken. Of note, the relevant local and regional planning documents includes:

- The Partially Operative Regional Policy Statement 2019.
- The Proposed Regional Policy Statement 2021.
- Central Otago District Plan.
- Cromwell Master Plan
- Kāi Tahu ki Otago Natural Resource Management Plan (2005)
- Te Tangi a Tauira – The Cry of the People: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan (2008)

5.2.1 Partially Operative Regional Policy Statement 2019

Table 2: Assessment of the relevant objectives and policies of the Partially Operative Regional Policy Statement 2019.

Provision	Description	Assessment
Objective 1.1	Otago's resources are used sustainably to promote economic, social, and cultural wellbeing for its people and communities.	The primary resource in relation to this project is the land itself. As detailed in the Productive Capacity Assessment, the site does not represent any particular unique qualities in terms of soils and previous land-based primary production has been the subject of sustained economic losses due to various external factors including climatic conditions and market shifts. This has resulted in the continued use of the site for primary production to be unsustainable. The Site is located in close proximity to the existing Medium Density Zone of the Cromwell urban area, as well as being across the road from what will be the primary sports hub for Cromwell. Geographically, this represents a logical and appropriate location in which to consider urban growth without compromising rural amenity values. The development will provide substantial social and economic benefits through the delivery of approximately 755 dwellings, associated commercial and industrial opportunities, employment generation, and supporting infrastructure. The proposal provides significant uplift in housing and contributes toward a more responsive and efficient urban environment within Cromwell. The master-planned nature of the proposal also enables integrated management of land use, infrastructure, transport, stormwater, and landscape outcomes in a coordinated manner that supports the wellbeing of current and future communities.
Objective 1.2	Recognise and provide for the integrated management of natural and physical resources to support the wellbeing of people and communities in Otago	The development has been designed through an integrated master-planning process that coordinates urban growth with

		infrastructure provision, stormwater management, landscape treatment, transport connectivity, ecological considerations, and open space networks. The preliminary technical assessments confirm that infrastructure servicing requirements can be appropriately managed through staged upgrades and coordinated delivery. The proposal also incorporates green corridors, stormwater greenways, and landscape buffers that integrate natural and physical resource management within the urban structure.
Policy 3.2.4	Managing outstanding natural features, landscapes and seascapes Protect, enhance or restore outstanding natural features, landscapes and seascapes, by all of the following: a) In the coastal environment, avoiding adverse effects on the values (even if those values are not themselves outstanding) that contribute to the natural feature, landscape or seascape being outstanding; b) Beyond the coastal environment, maintaining the values (even if those values are not themselves outstanding) that contribute to the natural feature, landscape or seascape being outstanding; c) Avoiding, remedying or mitigating other adverse effects; d) Encouraging enhancement of those areas and values that contribute to the significance of the natural feature, landscape or seascape.	While the development will alter the existing horticultural character of the site, landscape assessments conclude that the proposal will not adversely affect the key values that contribute to the surrounding Outstanding Natural Landscapes (ONLs) or Significant Amenity Landscapes (SALs). The proposal is located on the Cromwell valley floor and does not encroach upon prominent skylines, ridgelines, or elevated landforms that contribute to the wider landscape character of the Basin. Rather, the development will read as a contained and coherent extension of the existing Cromwell urban environment, particularly when viewed in the context of surrounding urban and rural residential development.
Policy 3.2.6	Managing highly valued natural features, landscapes and seascapes Maintain or enhance highly valued natural features, landscapes and seascapes by all of the following: a) Avoiding significant adverse effects on those values that contribute to the high value of the natural feature, landscape or seascape; b) Avoiding, remedying or mitigating other adverse effects; c) Encouraging enhancement of those values that contribute to the high value of the natural feature, landscape or seascape.	Proposed landscape mitigation measures, including extensive planting, green buffers, streetscape design, and stormwater greenways, will assist in integrating the proposal into the receiving environment and mitigating visual effects. The proposal is therefore considered to maintain the broader landscape values of the surrounding ONLs and SALs while appropriately managing localised visual effects.
Objective 4.5	Urban growth and development is well designed, occurs in a strategic and coordinated way, and integrates effectively with adjoining urban and rural environments.	As detailed herein, the site is strategically positioned such that development of the land in a coordinated manner will ensure

		the proposal integrates effectively with the adjoining land uses.
Policy 4.5.1	Providing for urban growth and development Provide for urban growth and development in a strategic and co-ordinated way, including by: a) Ensuring future urban growth areas are in accordance with any future development strategy for that district. b) Monitoring supply and demand of residential, commercial and industrial zoned land; c) Ensuring that there is sufficient housing and business land development capacity available in Otago; d) Setting minimum targets for sufficient, feasible capacity for housing in high growth urban areas in Schedule 6 e) Coordinating the development and the extension of urban areas with infrastructure development programmes, to provide infrastructure in an efficient and effective way. f) Having particular regard to: i. Providing for rural production activities by minimising adverse effects on significant soils and activities which sustain food production; ii. Minimising competing demands for natural resources; iii. Maintaining high and outstanding natural character in the coastal environment; outstanding natural features, landscapes, and seascapes; and areas of significant indigenous vegetation and significant habitats of indigenous fauna; iv. Maintaining important cultural or historic heritage values; v. Avoiding land with significant risk from natural hazards; g) Ensuring efficient use of land; h) Restricting urban growth and development to areas that avoid reverse sensitivity effects unless those effects can be adequately managed; i) Requiring the use of low or no emission heating systems where ambient air quality is: i. Below standards for human health; or ii. Vulnerable to degradation given the local climatic and geographical context; j) Consolidating existing coastal settlements and coastal urban areas where this will contribute to avoiding or mitigating sprawling or sporadic patterns of settlement and urban growth.	The development represents a strategic and coordinated urban expansion that contributes toward a well-functioning urban environment and responds to anticipated growth within Cromwell. The proposal will provide substantial additional housing capacity together with supporting commercial and industrial activities, thereby assisting in maintaining sufficient residential and business land supply within the district. The site is logically located adjacent to existing and anticipated urban development, including the Shannon Farm development and nearby Medium Density Residential zoned land, and therefore represents a consolidated rather than sporadic pattern of urban growth. The masterplan promotes efficient land use, integrated transport connections, active transport opportunities, and coordinated infrastructure delivery. Infrastructure assessments confirm that potable water, wastewater, stormwater, and transport upgrades can be delivered progressively in alignment with staging of the development. The proposal also avoids areas of significant natural hazard risk and does not adversely affect significant indigenous vegetation or habitats. While the site contains LUC 3 soils, assessments conclude that the land does not possess regionally significant productive characteristics and is no longer economically viable for horticultural production. Potential reverse sensitivity effects on surrounding activities are considered manageable given the evolving urban context of the locality and the proposed landscape and interface treatments.

		Overall, the proposal represents an efficient and logical urban growth outcome that aligns with the strategic direction of accommodating growth in a coordinated and integrated manner.
Policy 4.5.2	Achieve the strategic integration of infrastructure with land use, by undertaking all of the following: a) Recognising and providing for the functional needs of infrastructure; ...	The development has been planned in conjunction with existing and anticipated infrastructure upgrades, including recently upgraded water and wastewater infrastructure associated with the adjacent Shannon Farm development. The preliminary infrastructure assessment confirms that infrastructure can be appropriately integrated and expanded to accommodate the proposal through staged delivery and targeted upgrades. The masterplan also integrates land use and infrastructure outcomes through coordinated stormwater management systems, transport connections, green corridors, and active transport networks. This integrated approach recognises and provides for the functional needs of infrastructure while ensuring that urban growth occurs in a logical, efficient, and coordinated manner.

The development is considered to be consistent with the Partially Operative Regional Policy Statement 2019.

5.2.2 Proposed Regional Policy Statement 2021

Table 3: Assessment of the relevant objectives and policies of the Proposed Regional Policy Statement 2021.

Provision	Description	Assessment
NFL – Natural Features and landscapes		
NFL-O1	The areas and values of Otago's outstanding natural features and landscapes are identified, and the use and development of Otago's natural and physical resources results in the protection of them from inappropriate subdivision, use and development.	While the development will alter the existing horticultural character of the site, the landscape assessment concludes that the proposal will not adversely affect the key values that contribute to the surrounding Outstanding Natural Landscapes (ONLs) or Significant Amenity Landscapes (SALs).
NFL-P2	Protect outstanding natural features and landscapes from inappropriate subdivision, use and development by: (1) maintaining the values that contribute to the natural feature or landscape being considered outstanding, even if those values are not themselves outstanding,	

	(2) avoiding, remedying or mitigating other adverse effects; and (3) managing the adverse effects of infrastructure on the values of outstanding natural features and landscapes in accordance with EIT-INF-P13.	
UFD – Urban Form and Development		
UFD – O1	The development and change of Otago's urban areas occurs in a strategic and coordinated way, which results in well-functioning urban environments, that: (1) accommodate the diverse and changing needs and preferences of Otago's people and communities, now and in the future, (2) integrate effectively with infrastructure, development infrastructure and additional infrastructure, and surrounding urban areas and rural areas, including by managing reverse sensitivity effects and direct effects on electricity networks, (2A) are consolidated, well-connected and have a well-designed urban form, (2AB) have effective and efficient infrastructure, development infrastructure and additional infrastructure, (2B) support climate change adaptation and climate change mitigation, and (3) takes into account the values and aspirations of iwi, hapū and whānau, including for urban development.	The development represents a strategic and coordinated urban expansion that will contribute to a well-functioning urban environment through the delivery of approximately 755 dwellings, associated commercial and industrial land, integrated transport connections, open space networks, and supporting infrastructure. The master-planned nature of the proposal enables a consolidated and connected urban form that responds to Cromwell's anticipated growth needs while integrating effectively with the surrounding urban environment, including the Shannon Farm development and existing Medium Density Residential zoned land. The proposal accommodates a diverse range of housing typologies and supporting commercial opportunities, thereby responding to the changing needs of the community. The preliminary urban design assessment confirms strong alignment with recognised urban design principles through the provision of walkable neighbourhoods, active transport connections, green corridors, stormwater integration, and landscape-led design responses. Infrastructure assessments also confirm that servicing can be delivered in a coordinated and staged manner, with upgrades aligned with growth demand over time. The proposal further supports climate resilience and adaptation through integrated stormwater management systems, green infrastructure, landscape planting, and a more consolidated urban form that reduces reliance on dispersed development patterns. No known issues relating to iwi or cultural values have been identified at this stage, noting that

		accidental discovery protocols are proposed as part of the development framework. In addition, the applicant continues to engage with all relevant iwi organisations throughout this process.
UFD-P4	Expansion of existing urban areas should only occur where, at a minimum, the expansion: (1) contributes to establishing or maintaining the qualities of a well-functioning urban environment, (1A) is identified by and undertaken consistent with strategic plans prepared in accordance with UFD-P1, or is required to address a shortfall identified in accordance with UFD-P2, (1B) achieves consolidated, well designed and sustainable development in and around existing urban areas, (2) is logically and appropriately staged, and will not result in inefficient or sporadic patterns of settlement and residential growth, (3) is integrated efficiently and effectively with infrastructure, development infrastructure and additional infrastructure in a strategic, timely and co-ordinated way, (4) addresses issues of concern to iwi and hapū, including those identified in any relevant iwi planning documents, (5) manages adverse effects on other values or resources identified by this RPS that require specific management or protection, and (6) avoids, highly productive land except as provided for in the NPS-HPL, and considers adverse effects, particularly reverse sensitivity effects, on existing and anticipated primary production or rural industry activities when determining the location of the new urban/rural boundary, (7) protects the efficient and effective operation, maintenance, upgrading and development of nationally significant infrastructure and regionally significant infrastructure in accordance with EIT-INF-P15, and electricity distribution infrastructure in accordance with EIT-INF-P9A, and (8) except as provided for in (7), limits, to the extent reasonably possible, the effects on operation, maintenance, upgrading and development of development infrastructure and additional infrastructure.	The development represents a logical extension of the Cromwell urban area and will consolidate growth within an area already experiencing significant urbanisation. The site is positioned between existing and anticipated residential environments and effectively infills land between the established urban edge of Cromwell and the consented Shannon Farm development. As such, the proposal avoids sporadic or isolated urban expansion and instead contributes toward a coherent settlement pattern. The proposal is intended to be staged over time, ensuring that infrastructure delivery and upgrades can occur progressively ahead of development demand. Assessments confirm that transport, three waters, and stormwater infrastructure can be appropriately integrated with the wider network through planned upgrades and coordinated servicing arrangements. Potential reverse sensitivity effects on surrounding activities are considered limited given the transitional nature of the locality and the ongoing urbanisation of the wider area. The proposal is also considered to appropriately manage effects on landscape, ecological, natural hazard, and infrastructure values identified elsewhere in the Regional Policy Statement. The landscape assessment concludes that while the proposal will alter the existing horticultural character of the site, it will not adversely affect the legibility of surrounding Outstanding Natural Landscapes or Significant Amenity Landscapes and will read as a contained extension of the wider Cromwell urban form.
UFD-P5	Provide for commercial activities in urban areas by:	The masterplan incorporates commercial areas intended to support local community needs

	(1) enabling a wide variety and scale of commercial activities, social, recreational and cultural activities to concentrate in city, metropolitan, town centre and commercial zoned areas, where appropriate, especially if they are highly accessible by public transport or active transport, and (2) enabling smaller local and neighbourhood centres, mixed use zones and rural settlements to accommodate a variety of commercial activities, social, recreational and cultural activities of a scale appropriate to service local community needs.	and reduce reliance on travel to more distant centres. The preliminary economics assessment concludes that the scale and function of the proposed commercial activity is unlikely to undermine the vitality or viability of the Cromwell town centre. Instead, the proposal is expected to complement the wider urban environment by providing local services, improving convenience, and supporting a more self-sustaining community structure. The proposed commercial areas are also integrated with active transport networks and surrounding residential development, supporting accessibility and walkability.
UFD-P6	Provide for industrial activities in urban areas by: (1) identifying specific locations and applying zoning suitable for accommodating industrial activities and their reasonable needs and effects including supporting or ancillary activities, (2) identifying a range of land sizes and locations suitable for different industrial activities, and their operational needs including land-extensive activities, (3) managing the establishment of non-industrial activities, in industrial zones, to avoid the likelihood of reverse sensitivity effects on existing or potential industrial activities arising, unless the potential for reverse sensitivity is insignificant.	The masterplan includes provision for industrial land in an identified and integrated location capable of accommodating local employment-generating activities and associated operational needs. The industrial component forms part of the overall master-planned urban structure and is intended to support economic self-sufficiency and reduce travel demand. The proposal also provides the opportunity to appropriately manage interface effects between industrial and non-industrial activities through detailed design, design controls, and separation treatments, thereby limiting the potential for reverse sensitivity effects.
LF-LS-O11	The availability and productive capacity of highly productive land for primary production is protected from inappropriate use and development now and for future generations.	While the site contains predominantly LUC 3 soils, the productive capacity assessment concludes that the land does not possess unique or regionally significant productive characteristics and that comparable soils are widespread throughout Otago. In addition, the recent amendments to the NPS-HPL exclude the site from the interim highly productive land provisions due to the lodging of the current resource consent application. Irrespective of this, evidence demonstrates that cherry production on the site has
LF-LS-O12	The use, development, and protection of land and soil: (1) safeguards the life-supporting capacity of soil, (1A) sustains the potential of land and soil to meet the reasonably foreseeable needs of future generations while recognising the extractive nature of mining, (2) contributes to achieving environmental outcomes for fresh water, and (3) recognises the role of these resources in providing for the social, economic, and cultural well-being of Otago's people and communities.	

		become economically unviable due to sustained financial losses, climatic variability, declining market returns, and increasing production costs. In this context, the proposal is not considered to materially compromise the long-term availability or productive capacity of highly productive land at a regional scale.
LF-LS-P19	Maintain the availability and productive capacity of highly productive land by identifying and managing the use of highly productive land in accordance with the NPSHPL	As above, the NPS-HPL is not applicable.
UFD-P7	The management of use and development in rural areas: (2) maintains rural areas as places where people live, work and recreate and where a range of activities and services are required to support these rural functions, and provide for social and economic wellbeing within rural communities and the wider region, (3) prioritises land-based primary production on highly productive land in accordance with the NPS-HPL, except as provided for in (5) below, (4) provides for primary production, rural industry, and supporting activities, and recognises: (a) the importance of these activities to the social and economic wellbeing of Otago's communities, and (b) that mining and aggregate activities can only be located where those resources are present, (5) enables the use by Kāi Tahu of Native Reserves and Māori Land in accordance with MW-P4, (6) restricts the establishment of non-rural activities which could adversely affect, including by way of reverse sensitivity or fragmentation, the productive capacity of highly productive land, or existing or anticipated primary production and rural industry activities, except as provided for in (5) or the NPSHPL; and (7) recognises the national and regional importance of the Otago Corrections Facility to the health, safety and welfare of communities and enables its continued use, upgrading and development, including by: (a) avoiding the establishment of incompatible activities which could give rise to adverse effects on the security and operation of the Facility and/or the welfare of its occupants; and (b) managing the adverse effects of primary production and rural industry on the security and operation of the Facility and/or the welfare of its occupants.	While the development will convert rural land to urban use, the site is located within a transitional environment that is already undergoing significant urbanisation. The proposal does not compromise the viability of surrounding rural land to the north which is currently low intensity grazing and constrained by an SAL overlay. Potential reverse sensitivity effects are considered manageable through design responses, interface landscaping, and the evolving urban character of the area. The proposal also recognises that the site no longer supports economically viable primary production activities and therefore represents a logical and efficient urban growth outcome within the wider Cromwell Basin.

Overall, the proposal is considered to be consistent with the relevant Regional Policy Statements.

5.2.3 Central Otago District Plan

In terms of the relevant provisions of the Central Otago District Plan, these are assessed as follows:

Table 4: Assessment of relevant objectives and policies of the Central Otago District Plan.

Provision	Description	Assessment
4.3.1	Objective - Needs of the District's People and Communities To recognise that communities need to provide for their social, economic and cultural wellbeing, and for their health and safety at the same time as ensuring environmental quality is maintained and enhanced.	The proposal is considered to be entirely consistent with this objective. In its current form, the productive capacity assessment has evaluated the economic viability of the site for horticultural uses and the decisions leading to the cessation of the orcharding activities. The current use does not represent an alignment to Objective 4.3.1. Instead, the development will provide a substantial increase in housing supply, including approximately 755 new dwellings, together with associated commercial and employment opportunities that will contribute positively to the social and economic wellbeing of the Cromwell community. The proposal also incorporates integrated transport connections, public open space, landscape treatment, and infrastructure upgrades that support community health, safety, and amenity. While the development will result in a change to the existing rural character of the site, the technical assessments undertaken conclude that environmental effects can be appropriately managed through design, staging, landscaping, and mitigation measures.
4.3.3	Objective - Landscape and Amenity Values To maintain and where practicable enhance rural amenity values created by the open space, landscape, natural character and built environment values of the District's rural environment, and to maintain the open natural character of the hills and ranges.	While the development will alter the existing horticultural and rural character of the site, the proposal is located within an area already experiencing significant urbanisation and is effectively positioned between existing and anticipated residential environments. The landscape assessment concludes that the proposal represents a logical consolidation and extension of Cromwell's urban form rather than an isolated incursion into the wider rural landscape.

		In addition, the development will not diminish the legibility of nearby Outstanding Natural Landscapes or Significant Amenity Landscapes, or adversely affect the open natural character of the surrounding hills and ranges. Proposed landscape buffers, indigenous planting, green corridors, and streetscape treatments will assist in integrating the development into the receiving environment and mitigating visual effects.
4.4.2	Policy– Landscape and Amenity Values To manage the effects of land use activities and subdivision to ensure that adverse effects on the open space, landscape, natural character and amenity values of the rural environment are avoided, remedied or mitigated through: (a) The design and location of structures and works, particularly in respect of the open natural character of hills and ranges, skylines, prominent places and natural features, (b) Development which is compatible with the surrounding environment including the amenity values of adjoining properties, (c) The ability to adequately dispose of effluent on site, (d) Controlling the generation of noise in back country areas, (e) The location of tree planting, particularly in respect of landscape values, natural features and ecological values, (f) Controlling the spread of wilding trees. (g) Encouraging the location and design of buildings to maintain the open natural character of hills and ranges without compromising the landscape and amenity values of prominent hillsides and terraces.	The master-planned nature of the development has enabled careful consideration of the location of built form, infrastructure, landscaping, and interface treatments to ensure compatibility with the surrounding environment. The proposal avoids inappropriate development on prominent landforms and maintains the open natural character of surrounding hills and ranges through its valley-floor location and containment within the broader Cromwell urban environment. Extensive landscape planting, green corridors, and stormwater greenways are proposed to soften visual effects and enhance amenity values. The Three Waters Feasibility assessment confirm that wastewater and stormwater can be appropriately managed through staged upgrades and integrated design responses. No significant issues relating to noise, wilding trees, or ecological degradation have been identified.
4.4.8	Policy - Adverse Effects on the Amenity Values of Neighbouring Properties. To ensure that the effects associated with some activities including (but not limited to): (a) Noise (including noise associated with traffic generation, night time operations), and vibration, (b) The generation of a high level of traffic, in particular heavy vehicles, (c) Glare, particularly from building finish, (d) A reduction in visual amenity due to excessive signage and the storage of goods or waste products on the site, (e) The generation of odour, dusts, wastes and hazardous substances, and (f) The use and/or storage of hazardous goods or substances	While the development will increase traffic movements, urban activity, and built form relative to the existing horticultural use, assessments conclude that these effects can be appropriately managed and will not significantly adversely affect neighbouring properties or the wider transport network. Traffic effects are anticipated to be mitigated through the design of internal roading and access arrangements, upgrades to the SH6/Ripponvale Road intersection by way of a roundabout, closure of the existing crossing place on the

	do not significantly adversely affect the amenity values and privacy of neighbouring properties or the safe and efficient operation of the roading network.	Highway, and the provision of integrated walking and cycling infrastructure. Potential amenity effects can be appropriately controlled through detailed design in the substantive consenting process, and conditions of consent. The proposal's landscape framework and interface treatments will also assist in maintaining reasonable amenity outcomes for adjoining rural and rural residential properties.
4.3.7	Objective - Soil Resource To maintain the life-supporting capacity of the District's soil resource to ensure that the needs of present and future generations are met.	The surrounding environment already exhibits a transition from productive rural land towards urban and rural residential development, including the adjacent Shannon Farm development and nearby Medium Density Residential zoning. While some rural production activities remain in the wider area, the proposal acknowledges and responds to the existing and anticipated environmental characteristics of the locality. In addition, evidence demonstrates that cherry production on the site is no longer economically viable due to sustained financial losses and broader industry pressures. Accordingly, the proposal represents a logical transition in land use within an area already undergoing urbanisation.
16.3.1	To ensure that subdivision avoids, remedies, or mitigates adverse effects on the safe and efficient operation of the districts roading network.	While the development will increase traffic generation, the preliminary transport assessments conclude that the additional traffic can be safely and efficiently accommodated within the surrounding network subject to identified upgrades, including the provision of a roundabout at the SH6/Ripponvale Road intersection. The proposal will also improve active transport connectivity through integration with the Ripponvale Road shared pathway and SH6 underpass associated with the Shannon Farm development. Overall, the proposal adopts an integrated transport approach that supports

		safe and efficient network operation.
16.3.2	To ensure that subdivisions provide all necessary services and infrastructure without adversely affecting the public interest and the ongoing viability of those services and infrastructure.	The preliminary infrastructure assessments confirm that the site can be appropriately serviced for potable water, wastewater, and stormwater, with necessary upgrades capable of being delivered progressively through a staged development approach. The proposal benefits from recently upgraded infrastructure associated with nearby development and will contribute toward further upgrades through development contributions. Stormwater management has been comprehensively integrated into the masterplan through green corridors, detention areas, and engineered conveyance systems. Overall, the proposal will enable the provision of necessary infrastructure without adversely affecting the long-term viability of public services or networks.

Overall, the project is considered to be consistent with the Central Otago District Plan.

5.2.4 Cromwell Masterplan

The Cromwell ‘Eye to the Future’ Masterplan guides the development of land, infrastructure and buildings, in alignment with Cromwell community values. Stage 1 of the Masterplan, which was adopted by the Cromwell Community Board in May 2019, is centred around the Spatial Plan. The plan outlines a coordinated approach to managing growth in Cromwell over the next 30 years, aiming to balance infrastructure needs, community amenities, and environmental considerations.

The plan reflects the community's preferred option of growth focused within Cromwell and includes residential zones at a number of densities, increased housing options and amenities through more focused development within the walkable distance from the town centre. It also includes design guidelines for subdivisions, supports greenway preservation and development, and increased industrial opportunities.

The proposal supports and advances the vision of the Cromwell “Eye to the Future” Spatial Plan 2019, which seeks to meet the challenge of future growth by “*embracing opportunities that protect, share and enhance our ‘World of Difference’ values now and in the future*”. This vision is underpinned by a number of desired outcomes, including:

- An attractive, vibrant and thriving heart for Cromwell,
- Accommodating growth in a way that delivers Cromwell’s landscapes and visual amenity values,
- Enhancing how Cromwell functions,
- Housing is affordable and available and,

- A thriving and competitive local economy, supported by available resources.

The intent of the Spatial Plan was that the direction it provides would be implemented as part of Council led plan changes and District Plan reviews, a function that is no longer available due to the recent Government initiative to pause all plan changes.

The proposal directly responds to the Masterplan's overarching objective of managing growth in a coordinated and integrated manner over the long term, while balancing housing, infrastructure, employment, amenity, and environmental considerations.

The proposal advances the Spatial Plan's preferred growth approach of consolidating development within and around Cromwell, rather than dispersing growth into isolated or uncoordinated locations. The site represents a logical urban expansion area that adjoins existing and anticipated residential development, including the Shannon Farm development and nearby Medium Density Residential zoned land. As a result, the proposal contributes toward a more consolidated urban form that supports the long-term spatial structure anticipated by the Masterplan.

The proposal is also highly consistent with the Masterplan's emphasis on increasing housing choice and affordability. By enabling approximately 755 dwellings across a range of residential typologies, the development will make a substantial contribution toward meeting anticipated housing demand and improving housing supply within Cromwell. The scale of development will also assist in supporting more affordable housing outcomes over time by improving market responsiveness to continued population growth.

The proposal further aligns with the Masterplan's objective of enhancing how Cromwell functions through the provision of integrated transport connections, active transport infrastructure, green corridors, and coordinated infrastructure delivery. The master-planned design promotes walkability, connectivity, and accessibility, including integration with the Ripponvale Road shared pathway and SH6 underpass associated with the Shannon Farm development. These outcomes support the creation of a more connected and efficient urban environment consistent with the Spatial Plan vision.

In terms of landscape, while the proposal will introduce a significant change in land use from horticulture to urban development, assessments conclude that the development can be integrated into the receiving environment through comprehensive landscape treatment, green buffers, and urban design responses. The proposal also reflects the Masterplan's focus on preserving and enhancing greenway networks and visual amenity values through the incorporation of green corridors, stormwater greenways, open space areas, and indigenous planting.

The proposal additionally supports the Masterplan's goal of fostering a thriving and competitive local economy by providing commercial and industrial land capable of supporting employment opportunities, local services, and business growth. This will contribute toward creating a more self-sustaining community and reducing reliance on travel to other centres for employment and day-to-day services.

Overall, the proposal is considered to strongly support the strategic intent and desired outcomes of the Cromwell "Eye to the Future" Masterplan by delivering a coordinated, well-

designed, and infrastructure-supported urban growth outcome that responds positively to Cromwell's long-term growth needs.

5.2.5 Kāi Tahu ki Otago Natural Resource Management Plan (2005)

The Kāi Tahu ki Otago Natural Resource Management Plan (2005) is the principal planning document for Kāi Tahu, providing guidance for resource management in accordance with the values and aspirations of the rūnaka who hold mana whenua in Otago. The policy provisions of particular relevance include:

- 5.3.3(iii) – There is no discharge of human waste directly to water.
- 5.3.4(10) – Encourage all stormwater to be treated before discharge.
- 5.6.3(i) – Recognise the relationship with land in all resource management activities and decisions.
- 5.6.4(19) - To require all earthworks, excavation, filling or the disposal of excavated material to: i. Avoid adverse impacts on significant natural landforms and areas of indigenous vegetation; ii. Avoid, remedy, or mitigate soil instability; and accelerated erosion; iii. Mitigate all adverse effects.
- 5.6.4(25) - To discourage subdivisions and buildings in culturally significant and highly visible landscapes.
- 5.6.4(28) - To require applicants, prior to applying for subdivision consents, to contact Kāi Tahu ki Otago to determine the proximity of the proposed subdivision to sites of significance identified in the resource inventory.
- 5.6.4(26) – Encourage a holistic planning approach to subdivision.

The proposal aligns with these provisions as follows:

- In relation to Policies 5.3.3(iii) and 5.3.4(10), the proposal incorporates an integrated three waters servicing strategy that provides for connection to the existing Central Otago District Council wastewater network, thereby avoiding any direct discharge of human waste to water. The stormwater management strategy adopts a treatment-train approach incorporating detention, attenuation, landscaped swales, green corridors, and stormwater treatment measures prior to discharge, consistent with the objective of treating stormwater before discharge.
- In respect of Policy 5.6.3(i), the proposal recognises the relationship with land through a comprehensive master planning process that responds to the site's topography, landscape setting, natural drainage patterns, and surrounding environment. The proposal also incorporates substantial open space areas, landscape planting, ecological enhancement, and integrated stormwater corridors that respond to the characteristics of the site and wider Cromwell Basin.
- The proposal is consistent with Policy 5.6.4(19) as earthworks and land disturbance will be subject to detailed engineering, erosion and sediment control, stormwater management, and geotechnical design measures to appropriately manage potential adverse effects. Preliminary ecological and landscape assessments confirm that the site is highly modified and does not contain significant indigenous vegetation or natural landforms that would be adversely affected by the proposal.

- In relation to Policy 5.6.4(25), while the proposal introduces urban development within a currently rural environment, the site is located within an area already undergoing substantial urbanisation and does not form part of an identified culturally significant landscape. Preliminary landscape assessment confirms that the proposal will read as a logical extension of the existing and anticipated urban form of Cromwell and Shannon Farm, while landscape mitigation and buffering measures will assist in integrating development into the wider environment.
- Policy 5.6.4(28) is acknowledged and engagement with Kāi Tahu representatives will continue as the proposal progresses through the approvals process. The site is not identified as containing any known wāhi tapu or sites of cultural significance within the District Plan, and an accidental discovery protocol is proposed to appropriately manage any previously unidentified archaeological or cultural material encountered during earthworks.
- The proposal is consistent with Policy 5.6.4(26) through its integrated and holistic master planned approach, which coordinates residential, commercial, transport, open space, stormwater, ecological, and infrastructure outcomes into a cohesive urban environment.

Overall, the proposal is considered to be generally consistent with the relevant provisions of the Kāi Tahu ki Otago Natural Resource Management Plan 2005.

5.2.6 Te Tangi a Tauira – The Cry of the People: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan (2008)

The Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008 assists Ngāi Tahu ki Murihiku to participate in environmental planning and resource management processes. It consolidates Ngāi Tahu values, knowledge, and perspectives, representing an expression of kaitiakitanga.

In reviewing this document, there are no policies that are considered to be inherently relevant to this application. However, the applicant acknowledges the mana whenua relationship with the area and remains committed to ongoing consultation and partnership with Kāi Tahu representatives, ensuring that cultural values and kaitiakitanga principles continue to inform the detailed design and implementation of the project.

5.3 Referring the project to the fast-track approvals process - (s22(1)(b))

Section 22(1)(b) of the FTAA requires consideration of the following:

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

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

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

The site is zoned both Rural Resource Area and Rural Resource Area [Rural Residential Notation] under the Central Otago District Plan.

The nature of the underlying Zoning would necessitate a non-complying resource consent process, and a number of policy challenges under the CODP, such that significant delays and complexities would be involved if following normal processes. This includes the provision for public notification, hearings and potential Environment Court appeals. Specifically, Central Otago District Council staff do not have delegation to assess and make a determination of a non-complying resource consent, and instead Council delegates all such decision making to an independent Panel (made up of either Councillors or independent commissioners. This process involves significant timing and cost constraints.

In addition, the scale of the project would necessitate consideration under the various provisions of the Otago Regional Plans which inevitably includes a degree of complexity, time and costs.

To this end, advancing a referral under the FTAA is considered to support and facilitate timely and efficient implementation of the proposed urban development as required under s22(1)(b)(i).

The proposal is unlikely to materially affect the efficient operation of the fast-track approvals process as required under s22(1)(b)(ii).

6 ASSESSMENT OF EFFECTS

6.1 Assessment of anticipated and known effects on the environment (s13(4)(h))

In accordance with s13(4)(h) of the FTAA, the following anticipated and known adverse effects of the project on the environment are assessed below. It is considered that effects in relation to the following matters are relevant:

- Productive capacity effects
- Landscape effects
- Urban Design
- Infrastructure effects
- Economics effects
- Transport effects
- Ecological effects
- Natural Hazards
- Iwi and cultural effects
- Heritage effects
- Contaminated land
- Reverse sensitivity effects

6.1.1 Productive capacity Assessment

An evaluation of the productive capacity (Productive Capacity Report) of the site has been assessed by The AgriBusiness Group (TAG) and is attached in **Appendix [F]**.

With respect to soil capability, the Productive Capacity Report considers the site's soils are generally suitable for horticulture where reliable irrigation is available. In the absence of irrigation, their use is largely limited to extensive pastoral farming.

The New Zealand Land Resource Inventory (NZLRI) indicates that the majority of the site (with the exception of a small area in the south-eastern corner) comprises Land Use Capability (LUC) Class 3 soils. Regionally, the Productive Capacity Report identifies this land class is relatively widespread, with approximately 335,364 hectares identified within Otago.

Irrespective of the soil classification, the assessment concludes that the loss of productive land associated with the proposal is negligible in the regional context. This is when considered against the substantial extent of comparable soils, including over 200,000 hectares of similar soil types and 335,364 hectares of LUC 3 land across Otago.

Furthermore, the Productive Capacity Report notes that the soils present on the site are not identified as having any special or unique productive characteristics. They are semi-arid in nature, typically dry for much of the growing season, and reliant on irrigation to achieve high productivity. While nutrient levels are relatively high, limitations include salt accumulation in the subsoil, moderate water-holding capacity, high structural vulnerability, and a high potential for nitrogen leaching. Physically, the soils are derived from alluvial deposits and are generally well-drained, with loam textures in the topsoil and subsoil, and underlying gravel layers at depth. While capable of supporting productive land uses under irrigation, these characteristics do not elevate the soils to a level that would warrant special protection in terms of their productive capacity. Overall, the proposal will not result in the loss of soils with significant or special productive value, nor will it materially compromise the availability of productive land within the district or region.

In terms of the contribution to social, economic and cultural wellbeing, cherry production on the Site has ceased following the 2025/26 season due to sustained financial losses. These losses have been driven by a combination of increasingly variable climatic conditions, declining and volatile market returns, and rising input costs.

While there were periods (from 2015 to 2018) that delivered favourable conditions, this was short-lived. Since then, increasing climatic volatility has negatively impacted both the quantity and quality of production. At the same time, rapid expansion of cherry production in New Zealand, coupled with substantial growth in Chile's export capacity, has led to oversupply in key Asian markets and sustained downward pressure on prices.

This global and domestic market shift has significantly reduced profitability across the industry, with indications that recovery is unlikely in the near term. The combined effects of production uncertainty, falling prices, and increasing costs have rendered cherry growing on the site economically unviable.

The decision to cease production reflects broader industry distress, evidenced by multiple orchard closures, liquidations, and sales within the region.

Overall, the data demonstrates that continued cherry production is no longer financially sustainable under current and foreseeable conditions.

6.1.2 Landscape Assessment

Landscape effects have been assessed in the Landscape Report prepared by Rough Milne Mitchell Landscape Architects (RMM) as detailed in **Appendix [G]**.

The Landscape Report confirms that the proposal will result in a fundamental change to the character of the Site, transitioning from its current working horticultural use to a mixed residential and commercial environment with a clearly urban form and character.

This shift is reflective of the evolving character of the Cromwell Basin. In particular, the Site is positioned between two distinct zones to the west and east, which effectively separate it from the wider Rural Resource Area. To the west, the Rural Resource Area (5) sub-zone is currently undergoing transformation through the Shannon Farm residential subdivision. In addition, land immediately across the highway to the east is zoned Medium Density Residential and, while not yet developed, anticipates urban development at densities of approximately 200m² per site. As such, the proposed change in character is not unexpected, but rather aligns with the established and anticipated pattern of urbanisation in the surrounding environment.

While the proposal introduces new built form and removes the working horticultural character of the Site, the development is generally compatible with the receiving environment and represents a logical and coherent extension of the settlement pattern between the established Cromwell township and the consented and anticipated rural residential lifestyle character of Shannon Farm. The development of the Site effectively infills the remaining land between these two distinct residential areas. The Site's gentle topography, proximity to existing and anticipated residential development and accessibility to key transport corridors make it both a rational and pragmatic location for development in the Basin.

From viewpoints within 1km of the Site the proposal will result in a loss of horticultural character and amenity values. Effects from further afield will be largely contained and moderated by distance, topography, and the existing environment. The highest levels of effect will be experienced in close proximity to the Site, particularly along SH6 and Ripponvale Road, where the change in character and increased visual complexity will be most apparent. However, within these locations, the proposal will read as a coherent and well-defined extension of Cromwell's urban edge. Backdropped by the terraced landform and with no skyline breach, the proposal will not diminish the legibility of the nearby ONLs or SAL and effectively infills the Cromwell valley floor which is characterised by the wider Cromwell urban area. From mid to long-range viewpoints, the proposal becomes an incremental addition to the existing pattern of development characterising Cromwell.

The proposal will contribute to the ongoing urbanisation of the Cromwell Basin and consolidation of Cromwell as an evolving township. The proposed landscape strategy suitably avoids and mitigates adverse landscape effects and includes extensive landscape buffers between the Site and the respective road facing boundaries, internalised indigenous planting strategies, the provision of streetscape designs and stormwater greenways. On this basis, the proposal is considered acceptable from a preliminary landscape and visual perspective.

When considering the Landscape Report, and recognising the spatial extent of the development site in the context of the overall Cromwell urban extent, the proposal

represents a logical, appropriately positioned land resource that is proximate enough to town unduly compromising the amenity values of the more rural areas to the north and south of the township proper.

6.1.3 Urban Design

An urban design assessment (Urban Design Report) undertaken by RMM is attached in **Appendix [G]** and concludes that the proposed masterplan demonstrates strong alignment with the New Zealand Urban Design Protocol's Seven Cs and the relevant provisions of the Central Otago District Plan, delivering a well-integrated and high-quality urban environment. The Urban Design Report of the Seven Cs is as follows:

- The development responds effectively to its context, establishing a clear rural–urban interface and integrating with Cromwell's landscape and settlement pattern.
- A strong character is achieved through landscape-led design, green buffers, and street layouts that reflect the town's rural identity.
- The proposal provides a high degree of choice, with a diverse range of residential typologies and supporting commercial and industrial areas that will enable local employment opportunities to help create a more convenient and self-sustaining community.
- Well-defined connections are created through a legible road hierarchy, active transport links, and integration with surrounding development, promoting accessibility and walkability. The site also benefits from the extensive pedestrian linkages associated with the Shannon Farm development through the establishment of a pedestrian walkway (along Ripponvale Road) and underpass under SH6, providing a direct linkage to the existing Cromwell urban centre.
- Creativity is evident in the use of green corridors and stormwater systems as key structuring elements, enhancing both amenity and environmental performance.
- A clear commitment to custodianship is demonstrated through sustainable design responses, including the provision of green corridors and parks that will protect view shafts and enable landscape planting that supports Cromwell's character. The green corridors and planting typology will enable a habitat corridor with positive ecological values along with periphery planting/landscape buffers to sensitively manage the interface with rural and rural residential neighbours.
- Finally, collaboration is embedded through the proposal's coordinated approach to future transport and pedestrian connections, integrated infrastructure planning with CODC, and the provision of shared open spaces.

Overall, the masterplan delivers a cohesive, resilient, and place-responsive neighbourhood that supports Cromwell's long-term growth while achieving positive urban design outcomes.

6.1.4 Infrastructure Assessment

An assessment in relation to Three Waters (Three Waters Feasibility Report) has been prepared by Hadley's Consultants Ltd (HCL) and is attached in **Appendix [C]**.

In relation to potable water supply, preliminary investigations indicate that CODC's existing water abstraction consents retain substantial available capacity, with current network usage estimated to be significantly below consented limits. While some localised reticulation constraints have been identified within the existing network, these are considered capable of being addressed through relatively minor capital upgrades and renewal works. The proposal includes provision for new reservoir infrastructure associated with the expanded Shannon Farm reservoir site, which will assist in managing peak demand and firefighting requirements internally. Overall, the effects on the potable water network are considered manageable and can be appropriately mitigated through staged infrastructure upgrades coordinated with development demand.

With respect to wastewater infrastructure, the Three Waters Feasibility Report identifies that upgrades will be required within parts of the downstream reticulation network and, over time, at the Cromwell Wastewater Treatment Plant to accommodate future growth. CODC is already aware of these capacity constraints and has provisioned upgrades through its Long Term Plan processes. The proposal will be developed progressively over an anticipated 8–12 year timeframe, allowing sufficient lead-in time for network improvements and treatment upgrades to occur ahead of demand. Subject to these planned upgrades, the wastewater effects associated with the proposal are considered capable of being appropriately managed.

Stormwater management has been a central component of the master planning process and has been informed by detailed hydraulic and catchment modelling using TUFLOW software. The modelling demonstrates that, following incorporation of detention, attenuation, conveyance, and treatment measures within the site, the proposal will not increase flooding effects on surrounding properties during significant rainfall events. The proposed stormwater management system integrates open channels, landscaped detention areas, green corridors, and piped conveyance infrastructure into the overall subdivision design. Importantly, the proposed solution also provides an opportunity to assist in addressing existing downstream flooding issues within the wider catchment through new trunk infrastructure connecting toward the Kawarau River.

Overall, the Three Waters Feasibility Report concludes that servicing effects can be appropriately avoided, remedied, or mitigated through detailed design, staged delivery, and coordinated infrastructure upgrades. The proposal will also be subject to development contributions, ensuring that the costs of necessary network improvements are appropriately funded as part of the development process.

6.1.5 Economics effects

An assessment on economics effects (including potential retail distribution effects associated with the proposed commercial precinct) is as detailed in the Economics Report prepared by Insight Economics (IE) and attached in **Appendix [E]**.

The Economics Report concludes that the proposed commercial precinct is unlikely to result in a material adverse retail distribution effect on the Cromwell town centre. While some diversion of retail spending and limited retailer relocation may occur, the town centre's overall vitality, critical mass, and anchor tenants are expected to be maintained. This is because widespread relocation of existing retailers is unlikely given the substantial costs associated with relocating premises including "make-good" obligations on the vacated premises, physical relocation of stock and fittings, fit-out costs at the new site, and updates to signage, branding, and marketing materials. There is also the opportunity cost associated with foregone or disrupted sales during the relocation period itself.

The projected growth in Cromwell's retail demand indicates capacity for around 24,270 m² of additional core retail floorspace by 2048 under a medium growth scenario, rising to around 29,650 m² under a high scenario. Recognising that land within the existing town centre is largely developed, the proposal provides relief for this expected demand and therefore would be seen as contributing to the demand and growth of Cromwell's commercial sector as opposed to diverting spending. On this basis, potential adverse distribution effects are considered to be no more than minor.

In terms of economics effects overall, the proposed development is underpinned by strong projected population growth in Cromwell, which is expected to significantly outpace the wider district and reinforces the town's role as a key growth node. In response, the proposal delivers substantial short-term economic benefits through the planning, development and construction phase, estimated to include employment for approximately 316 full-time workers over an eight-year period, \$216 million in wages and salaries, and an estimated \$365 million contribution to GDP.

6.1.6 Transport Assessment

A Transportation Assessment prepared by Carriageway Consulting Ltd (CCL) is attached in **Appendix [H]** and sets out at a high-level, the key transportation matters associated with the proposal, including changes in travel patterns that are likely to arise from development of the Site. Where potential adverse effects are identified, ways in which these can be addressed are set out.

The Transport Assessment notes a series of changes that are due to occur along Ripponvale Road, as a requirement (via Plan Change 14 and associated resource consents) for the implementation of the Shannon Farm rural residential development to the west of the site. These changes include:

- Ripponvale Road is to be improved such that it provides a 7.0m wide seal plus 0.25m metalled shoulders. This will mean that the formation of the road achieves the standard under the Council's Land Development and Subdivision Engineering Code of Practice for a Collector Road serving more than 500 lots.
- A shared walking and cycling route of 2.0m is required along Ripponvale Road between Shannon Farm and the state highway. This is complemented by a further requirement to construct a pedestrian underpass of the highway, providing direct connectivity to Cromwell.

The net outcome of this is that residents of Shannon Farm will be able to travel the full length of Ripponvale Road on a separated walking and cycling route, then cross beneath the highway, and then gain access to the remainder of the urban area using slower, quieter roads. These upgrades have been taken into account as part of the wider Transportation Assessment.

In terms of the proposal specifically, vehicular access to the site is proposed to be provided via new intersections onto Ripponvale Road. No direct vehicle access is proposed onto the state highway. Instead, all traffic originating from the Site/development will be consolidated to four new entrances connecting to Ripponvale Road. In addition, the existing priority-controlled State Highway 6 / Ripponvale Road intersection will be converted to a roundabout. An existing crossing point on the State Highway frontage will be closed.

The Transport Assessment concludes that the proposed development can be safely and efficiently accommodated within the surrounding transport network, subject to the intersection upgrades proposed. The assessment identifies that the development will generate a significant number of vehicle movements, particularly during weekday peak periods. However, the analysis also recognises that a proportion of these trips will comprise pass-by trips, internal trips within the development, and trips linked to nearby activities, thereby reducing the overall effect on the external road network. In addition, the site benefits from strong active transport connectivity through existing and proposed walking and cycling infrastructure, including the SH6 underpass and shared pathway connections to Cromwell.

Traffic modelling confirms that the proposed upgrade of the SH6/Ripponvale Road intersection to a roundabout is capable of accommodating forecast traffic volumes associated with both the proposal and the consented Shannon Farm development. While initial modelling identified capacity constraints during the weekday evening peak hour, further testing demonstrated that the provision of a short left-turn lane on the southern approach to the roundabout would significantly improve performance and enable acceptable levels of service across the network.

Assessment of the proposed site access arrangements also confirms that the development can operate efficiently, with acceptable delays and levels of service.

The internal roads within the site are likely to be able to comply with the Council's standards, and if any upgrading is required of the external roads, then the legal widths mean that this can be accomplished. No non-compliances have been identified at this stage with regard to the District Plan or to the NZTA Planning Policy Manual.

Overall, the Transport Assessment concludes that, with appropriate intersection upgrades and staged infrastructure improvements, the surrounding transport network has the capacity to support the proposed development while maintaining safe and efficient traffic operations.

6.1.7 Ecological Assessment

Despite the site being highly modified by the horticultural activities, an Ecological Impact Assessment (EclA) has been prepared by e3Scientific and is attached in **Appendix [I]**.

The EclA notes that the entire Site is comprised of exotic vegetation with no vegetation communities containing indigenous plant species. Much of the vegetation present on site has been deliberately planted and is not naturally occurring. As a result, the clearance of

vegetation to enable the proposal will not result in a loss of indigenous vegetation or habitats.

Fauna values are limited by the intensive management regime and lack of indigenous habitat. The site provides limited and generally low-quality foraging habitat for some native birds. No breeding habitat for indigenous avifauna was identified. Avifauna observed were predominantly common and widespread species typical of modified rural environments, including exotic passerines and a small number of native birds such as paradise shelduck and welcome swallow. Species not observed but identified by desktop assessment as having a moderate or greater likelihood of occurrence include the eastern falcon and silvereve.

Loss of terrestrial habitat will reduce foraging habitat for some avifauna species however it is noted that the majority of the site is under netting anyway. Given the limited ecological value of habitat present and the availability of similar or higher-quality habitat in the surrounding landscape, the EclA concludes that the proposed development is unlikely to result in any measurable impact on the local or regional distribution or population size of the eastern falcon or silvereve. Landscape planting within proposed green spaces is expected to improve post-development habitat diversity and connectivity, softening the transition between developed and undeveloped areas.

Targeted lizard surveys have confirmed the presence of McCann's skink, a not-threatened indigenous lizard species. Skinks were recorded at very low densities in areas of exotic grassland and orchard margins. No evidence of other lizard species was detected. Earthworks and vegetation clearance will directly affect areas occupied by McCann's skink. While this species is not threatened, it is protected under the Wildlife Act, and disturbance effects are therefore managed on a compliance basis rather than due to ecological significance. A Wildlife Act permit will be required for disturbance/salvage of this species.

Overall, based on the findings of the EclA, it is considered that ecological effects can be suitably mitigated and will be no more than minor.

6.1.8 Natural Hazards Assessment

A Natural Hazards Report has been produced by Geosolve Ltd and is attached in **Appendix [J]**.

The Natural Hazards Report identifies that the development site is subject to a range of manageable natural hazard risks, with no significant constraints to development provided appropriate design and mitigation measures are implemented.

Alluvial fan features are present across the site; however, these are assessed as largely dormant historic landforms with no evidence of recent activity. While shallow overland flow and sheet flooding may occur during intense rainfall events, these risks can be effectively mitigated through appropriate stormwater design, including engineered channels, swales, and soakage systems integrated into the subdivision layout.

In terms of seismic risk, while a nearby fault structure (Smallburn monocline) is identified, the long recurrence interval and low level of surface expression mean it poses a low constraint to typical residential development. The primary seismic risk is associated with the distant Alpine Fault, which may generate strong ground shaking; however, this is a regional risk that

can be appropriately managed through standard building design in accordance with relevant codes.

No significant landslide hazards have been identified within the site, and while geotechnical design will be required to ensure site stability during earthworks, the overall risk is low. Similarly, liquefaction risk is considered low due to the deep groundwater table across the site.

Overall, the Natural Hazards Report concludes that natural hazard risks are either low or can be effectively mitigated through standard engineering and design responses, and do not represent a barrier to the proposed development.

6.1.9 Iwi and cultural effects

The site is not identified in the District Plan as containing any wāhi tapu or nohoaka sites. Furthermore, it has been extensively modified over time through horticultural activities, reducing the likelihood of intact cultural features remaining.

Notwithstanding this, and in accordance with best practice, it is proposed that an accidental discovery protocol be included as a condition of consent and incorporated within the Environmental Management Plan. This will ensure that appropriate procedures are followed should any previously unidentified wāhi tapu or kōiwi be encountered during site works.

6.1.10 Heritage Effects

There are no known sites of historic or cultural significance within the application site. The site has undergone significant modification and disturbance over the years in relation to the horticultural and orcharding activities on the site.

Notwithstanding the above, and as per best practice, accidental discovery protocols will be implemented across all areas of the development. These protocols will ensure that any unexpected discoveries are appropriately managed in accordance with legislative requirements and best practice. Standard procedures will be detailed (along with any specific matters arising from the consultation with agencies and iwi groups) within the suite of consent conditions offered within the Substantive Application.

6.1.11 Contaminated land

A combined Preliminary and Detailed Site Investigation (PSI/DSI) has been undertaken by e3Scientific and is attached in **Appendix [K]**. This has concluded that historical and modern orchard activities have resulted in elevated copper and zinc concentrations across much of the site, consistent with long-term spray use. However, the PSI/DSI concludes it is highly unlikely that contaminants in soil would pose a risk to human health under the proposed land use, and wide spread remediation for human health is not required.

6.1.12 Reverse sensitivity

Potential reverse sensitivity effects between the proposed commercial and residential precincts are considered to be manageable through the integrated master-planned design approach adopted for the development. The proposal anticipates a mixed-use urban environment where residential, commercial, and employment-generating activities are intentionally co-located to support a more self-sufficient and well-functioning community. The

overall design premise of the masterplan includes substantial buffers and separation at the commercial/residential interface, consistent with the level of separation that already occurs in Cromwell generally.

The commercial precinct is intended to accommodate activities of a scale and nature compatible with an urban environment, rather than heavy industrial activities likely to generate significant off-site effects. As such, the potential for reverse sensitivity conflicts is inherently reduced. In addition, the masterplan provides opportunities to manage interface effects through detailed design measures including road hierarchy, building orientation, landscaping, acoustic attenuation, setbacks, screening, and the graduated transition of activities between precincts.

The proposal also benefits from the ability to coordinate land use outcomes comprehensively across the site through integrated staging (including further resource consents), design controls, and consent conditions. This enables sensitive interfaces to be proactively managed from the outset, reducing the likelihood that residential activities will constrain the ongoing operation of commercial activities, or vice versa. Overall, the potential for reverse sensitivity effects is considered low and capable of being appropriately mitigated through standard urban design and planning responses.

Potential reverse sensitivity effects on land surrounding the subject site are considered to be low and generally manageable given the existing and anticipated urban context of the locality. The site is positioned within an area already undergoing significant transition from productive rural land toward urban and rural residential development, and the surrounding land use pattern provides a strong urban interface on multiple fronts.

To the west, the consented Shannon Farm rural lifestyle development establishes an existing and anticipated residential environment that is inherently compatible with the proposed urban form and residential activities.

To the south, the reserve land currently occupied by the racecourse is identified within the relevant Reserve Management Plan for future sports and recreation activities. The proposed development is therefore unlikely to create reverse sensitivity constraints on this land, noting that organised recreation and sports activities are generally compatible with adjacent urban and residential environments. The proposal may in fact support the long-term viability and utilisation of such recreational facilities through increased nearby population and accessibility.

In relation to the Council-designated aerodrome located to the south of the site, the proposal is not considered to give rise to a material degree of additional reverse sensitivity effects. The aerodrome already operates in close proximity to existing residential and commercially zoned land within Cromwell, and the surrounding environment is therefore not characterised as an isolated or exclusively rural aviation setting. In addition, there are no identified height restrictions, approach protection overlays, or departure path controls in the District Plan applying to the subject site that would indicate operational sensitivity or constraints associated with the aerodrome. As such, the proposal is unlikely to materially alter the existing receiving environment or introduce a materially greater level of sensitive receptors than what is already anticipated and enabled within the wider urban area. Accordingly, the aerodrome will continue to operate within a broadly comparable urban interface environment

to that which currently exists, with no evidence to suggest that the proposal would compromise its ongoing operation or functionality.

Adjoining the eastern boundary is that of the Ripponburn Resthome. This interface will consist of Low Density Residential typologies, which is considered to be a sympathetic land use with the Resthome (more so than orcharding activities), such that no reverse sensitivity effects will arise.

Beyond Ripponburn, land opposite State Highway 6 is already zoned Medium Density Residential, signalling a clear expectation for future urban development. With this in mind, the proposal is highly compatible with the anticipated urban character of the area and is unlikely to generate reverse sensitivity effects that would constrain future residential development. Rather, the proposal will contribute toward the logical consolidation of urban growth on both sides of the highway corridor.

To the north, the terrace riser subject to the Significant Amenity Landscape (SAL) overlay is unlikely to be developed due to its landscape values and physical characteristics. At present, the land immediately adjacent to the Site is subject to low intensity pastoral grazing. As a result, there is limited potential for reverse sensitivity effects in this direction. The terrace riser will also provide a strong visual and physical edge to urban development, assisting in containing the proposed urban form within the valley floor environment.

The interface with the State Highway will be managed through the provision of a noise setback consent notice which will ensure residential activities within close proximity to the Highway are subject to appropriate noise attenuating design controls.

Overall, the proposal is considered unlikely to generate significant reverse sensitivity effects on surrounding land uses. The receiving environment is already characterised by existing and anticipated urbanisation, and the proposal represents a logical and integrated extension of that evolving settlement pattern.

6.1.13 Summary of effects

Overall, the anticipated and known effects of the proposal on the environment have been assessed and are considered to be acceptable, with potential impacts appropriately managed through design responses and mitigation.

7 AFFECTED PERSONS AND CONSULTATION (s13(4)(j) and s13(4)(k))

7.1 Persons and Groups the applicant considers likely to be affected (s13(4)(j))

Pursuant to s11(1) and s13(4)(j) of the FTAA, a list of the persons and groups the applicant considers are likely to be affected by the project and the status and outcome of consultation as required under s13(4)(k), is summarised in **Appendix [D]**, a summary of which is as follows:

Table 5: Summary of persons and ground likely affected by the proposal (s13(4)(j)), and details of consultation and outcomes informing project (s13(4)(k)).

Section 11 FTAA requirements	Authority	Consultation details – s13(k)(i)	How consultation informed project – s13(k)(ii)
(a) consult—			
(i) any relevant applicant groups with applications for customary marine title under the Marine and Coastal Area (Takutai Moana) Act 2011; and	N/A	Not applicable to this application.	
(ii) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou; and	N/A	Not applicable to this application.	
(b) notify in writing—			
(i) the relevant local authorities; and	Otago Regional Council	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet. Letter received from ORC on 11 May 2026 detailing potential relevant issues, planning requirements, and potential environmental effects that may require consideration in the preparation of the application. The letter also outlined some compliance matters which were promptly resolved. Refer to Appendix [D3] for correspondence details.	Consultation with ORC has informed the project through: • Identification of consent requirements under the Regional Water, Waste, and Air Plans. It is noted that ORC have identified the following potential air discharge requirements which will be determined through the substantive application: ○ Domestic heating appliances and outdoor burning). ○ The discharges of contaminants to air from the sorting, crushing, screening, conveying and storage of powdered or bulk products (including sand and aggregates) ○ The discharges of contaminants to air from building and construction activities ○ The discharge of fine particles (smaller than 10 microns (PM10)) • Guidance on information needed to enable suitable assessments ahead of the Substantive Application. • Clarification of the assessments and

			technical information to be included within the Substantive Application. This Planning Report includes further detail and information responding to the matters raised by ORC. Further technical assessments, draft consent conditions, and updated design details will be shared with ORC as the project design progresses.
	Central Otago District Council	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet. A Council wide meeting was held on 21 April 2026 with Council staff including: • Council three waters Manager and Team, • Council's Parks and Reserves Manager • Council's Planning and Policy Manager • Council's Engineering Team.	• Confirmation of next steps required to determine specific upgrades required to infrastructure. Council also advised timings associated with modelling and technical reviews associated with the infrastructure assessment. • Advice from Parks and Reserves was taken on board in light of providing connectivity from the development Site to the adjacent recreation reserve. • Consideration of how reverse sensitivity effects between the industrial precinct and residential precinct would be managed.
(ii) any relevant iwi authorities, hapū, and Treaty settlement entities, including— (A) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements; and (B) the tangata whenua of any area within the project area that is a taiāpure-local fishery, a mātaītai reserve, or an area that is subject to bylaws or regulations made under Part 9 of the Fisheries Act 1996; and	Te Runanga o Ngai Tahu (iwi authority)	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet. Email and letter received from Te Runanga o Ngai Tahu on 14 May 2026 confirming that Te Runanga o Ngai Tahu defers to Papatipu Rūnanga to provide feedback. The letter confirms that the appropriate entities have been engaged with and to maintain engagement and provide sufficient detail, about the project, to enable them to provide a response that is able to fully inform the application. Refer to Appendix [D4] for correspondence details.	Ongoing consultation with Te Runanga o Ngai Tahu will occur as progress is made towards the preparation of the substantive application, and completion of further technical reports.
	Aukaha (Entity owned by Papatipu Rūnanga)	Initial contact made on 13/04/2026 through providing a project summary	Ongoing consultation with Aukaha will occur as progress is made towards the preparation of the

		overview and invitation to meet. No response received	substantive, and completion of further technical reports.
	Te Ao Marama (Entity owned by Papatipu Rūnanga)	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet. No response received	Ongoing consultation with Te Ao Marama will occur as progress is made towards the preparation of the substantive, and completion of further technical reports.
	Te Rūnanga o Awarua (Papatipu Rūnanga – Treaty settlement entity)	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet. No response received	Ongoing consultation with Te Rūnanga o Awarua will occur as progress is made towards the preparation of the substantive, and completion of further technical reports.
	Komiti (Entity owned by Papatipu Rūnanga)	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet.	Initial online meeting held with Shane Ellison on 29 April 2026 on behalf of:
	Te Rūnanga o Moeraki (Papatipu Rūnanga – Treaty settlement entity)	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet.	• Te Rūnanga o Moeraki • Hokonui Rūnanga • Kāti Huirapa Rūnaka ki Puketeraki • Te Rūnanga o Ōtākou
	Hokonui Rūnanga (Papatipu Rūnanga – Treaty settlement entity)	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet.	No specific request/changes were obtained at this stage although the applicant will continue to work with the relevant parties throughout the process.
	Kāti Huirapa Rūnaka ki Puketeraki (Papatipu Rūnanga – Treaty settlement entity)	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet.	Refer to Appendix [] for correspondence details.
	Te Rūnanga o Ōtākou (Papatipu Rūnanga – Treaty settlement entity)	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet.	
	Te Rūnanga o Ōraka-Aparima (Papatipu Rūnanga – Treaty settlement entity)	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet. No response received	
	Waihōpai Rūnaka (Papatipu Rūnanga – Treaty settlement entity)	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet. No response received	
(iii) the relevant administering agencies; and	Ministry for the Environment (MFE)	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet. No response received from MFE.	

	Department of Conservation (DOC)	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet. Request for completion of DOC's specified Fast Track Approval form and preliminary questions received on 22 April 2026 (from Emma Fahey). Response to DOC with completed form and response to preliminary questions sent back on 24 April 2026. Email and letter received from DOC on 15 May 2026. The letter summarises the key project details provided to DOC in the Project Summary and states that further engagement is recommended prior to lodging a substantive application if the project progresses as this would allow DOC to give more focused feedback on the application. DOC also seeks for a full ecological assessment, including assessment of the actual and potential effects on vegetation, freshwater, and fauna including lizards and avifauna to be conducted. Refer to Appendix [A6] for correspondence details.	Ongoing consultation with DOC in accordance with their letter from 15 May 2026 will occur as progress is made towards the preparation of the substantive, and completion of further technical reports.
(iv) if the proposed approvals for the project are to include an approval described in section 42(4)(f) (land exchange), the holder of an interest in the land that is to be exchanged by the Crown; and	N/A		
(c) give the persons and groups referred to in paragraph (b) 20 working days to respond to the notice.			
S13(4)(k)(i) – Any other consultation	Charles Cyril Sanders, Kathleen Jill Sanders and Alan Bevin McKay - Landowner of Section 48 and Section 59 Block III Cromwell Survey District as contained in Title OT197/39	Landowner consulted in relation to an existing easement over the subject Site which affords access to the land.	Agreements are currently in preparation to relinquish existing easements with the Masterplan design including provision for access to this land
	Waka Kotahi New Zealand Transport Agency (NZTA)	Initial contact made on 13/04/2026 through providing a project summary overview and invitation to meet.	Ongoing consultation with NZTA will occur as progress is made towards the preparation of the substantive, and completion of further technical reports.

		Confirmation of receipt of application received by NZTA on 30 April and that this application has been forwarded to the Safety Engineer for consideration. No further responses received to date.	
	Central Otago District Council, as and owner of the adjacent racecourse (Designation D81) and designated aerodrome Designation D199)		Council engagement as a s11 local authority is detailed above. While specific engagement as landowner of adjacent land was not sought, the meeting was attended by Council's Parks and Recreation Manager and issues relating to interaction between the proposed development and the adjacent land uses were discussed.

7.2 Treaty Settlements (s13(4)(I))

Lake Dunstan / Te Wairere is a statutory acknowledgement area recorded in the Ngāi Tahu Claims Settlement Act 1998 (s13(4)(o)). Schedule 61 of the Act sets out the cultural, spiritual, historic, and traditional associations of Ngāi Tahu with Lake Dunstan / Te Wairere. The purposes of this statutory acknowledgement are to:

- (a) to require that consent authorities forward summaries of resource consent applications to Te Rūnanga o Ngāi Tahu as required by regulations made pursuant to section 207 (clause 12.2.3 of the deed of settlement); and
- (b) to require that consent authorities, Heritage New Zealand Pouhere Taonga, or the Environment Court, as the case may be, have regard to this statutory acknowledgement in relation to Te Wairere, as provided in sections 208 to 210 (clause 12.2.4 of the deed of settlement); and
- (c) to empower the Minister responsible for management of Te Wairere or the Commissioner of Crown Lands, as the case may be, to enter into a Deed of Recognition as provided in section 212 (clause 12.2.6 of the deed of settlement); and
- (d) to enable Te Rūnanga o Ngāi Tahu and any member of Ngāi Tahu Whānui to cite this statutory acknowledgement as evidence of the association of Ngāi Tahu to Te Wairere as provided in section 211 (clause 12.2.5 of the deed of settlement).

An extract of the Statutory Acknowledgement is attached in **Appendix [L]**. Consultation with Te Rūnanga o Ngāi Tahu has and will continue to be undertaken in accordance with their preferences as noted in their letter dated 14 May 2026 and attached in the consultation summary in **Appendix [D]**. The Site is approximately 2.4km from Lake Dunstan / Te Wairere. No initial concerns have been raised in relation to Lake Dunstan / Te Wairere, with further engagement to occur through the substantive application.

8 STATUTORY DOCUMENTS

As required by s 13(4)(y)(i), this section is provided in accordance with subclause 2(1)(a)(i) – (iii) of Schedule 5. This requires that applications include an assessment of the activity against the relevant provisions and requirements of the following statutory documents:

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

8.1 National Policy Statements

The most relevant national policy statements as it relates to this project includes:

- National Policy Statements on Urban Development 2020
- National Policy Statement for Natural Hazards 2025
- National Policy Statement on Indigenous Biodiversity (NPS-IB)
- National Policy Statement for Highly Productive Land 2022 (NPS – HPL)
- National Policy Statement on Freshwater Management 2020 (NPS-FM)

8.1.1 National Policy Statements on Urban Development 2020 (NPS-UD)

The National Policy Statement on Urban Development (NPS-UD), recognises the national significance of:

- having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future
- providing sufficient development capacity to meet the different needs of people and communities.

The following objectives and policies are considered relevant:

- Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future;
- Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets;
- Objective 6: Local authority decisions on urban development that affect urban environments are:
 - integrated with infrastructure planning and funding decisions; and
 - strategic over the medium term and long term; and
 - responsive, particularly in relation to proposals that would supply significant development capacity.

- Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:
 - have or enable a variety of homes that:
 - meet the needs, in terms of type, price, and location, of different households; and
 - enable Māori to express their cultural traditions and norms; and
 - have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
 - 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
 - support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
 - support reductions in greenhouse gas emissions; and
 - are resilient to the likely current and future effects of climate change.

With reference to the various supporting reports, the proposal is consistent with the NPS-UD for the following reasons:

- The proposal enables a master-planned community that provides a coordinated and efficient approach to urban growth, delivering broader economic, social, and infrastructure benefits than fragmented development.
- The scale and integrated nature of the development enables economies of scale, more efficient and cost-effective infrastructure delivery, and sustained employment opportunities for local contractors and tradespeople.
- The proposal also supports the creation of a well-functioning urban environment through integrated neighbourhood design that promotes walkability, accessibility, safety, and the provision of local services and amenities.
- By coordinating housing, infrastructure, transport networks, and commercial activities within a single comprehensive framework, the development avoids many of the inefficiencies associated with ad hoc urban expansion, including inconsistent urban form, infrastructure duplication, and land banking. Overall, the proposal establishes a strong foundation for sustainable long-term urban growth and enhanced liveability for future residents.
- In addition to directly boosting dwelling capacity, the proposal will also help to foster competition in the local land market. This is important because, as recognised through Objective 2 of the NPS-UD, competition is the cornerstone of economic

efficiency. When the land market becomes more competitive, land developers have a greater incentive to bring their product to the market in a more timely and cost-effective manner, thus further helping to keep local housing as affordable as possible. Absent competition, landowners experience “market power,” which enables them to charge more for land and be slower in releasing it to the market. Both outcomes conspire against affordability and reduce the overall efficiency of the housing market.

- The proposal will also enable a wide range of dwelling types and sizes to be constructed on the land over time, such as terraced, duplex, and detached dwellings. This diversity of end use helps the proposal give effect to Policy 1(a)(i) of the NPS-UD, which requires planning decisions to contribute to well-functioning urban environments that provide a variety of homes to meet the needs of a diverse population. Importantly, the proposal includes sections that are considerably smaller than Cromwell’s existing housing stock, with an average section size of 440 m² compared to an average of approximately 875 m². Developments like this are critical to providing a range of smaller and more affordable dwellings to meet the rapidly evolving needs of the area.
- The proposal will deliver a significant increase in housing supply by enabling approximately 755 new dwellings within Cromwell. This represents a substantial uplift in residential development capacity that will assist in meeting expected population growth and improving the responsiveness of the housing market over time. In doing so, the proposal is expected to help moderate longer-term housing affordability pressures in a district where house prices and mortgage servicing costs remain significantly above traditional affordability benchmarks.

The proposal is considered to be consistent with the NPS-UD.

8.1.2 National Policy Statement for Natural Hazards 2025 (NPS-NH)

The NPS-NH requires local authorities and decision-makers to assess and manage natural hazard risks in a consistent, risk-based and proportionate manner. It has a strong emphasis on avoiding very high risks, using the best available information. It also considers long-term natural hazard risk, and requires decision-makers to consider mitigations. It sets a national baseline but allows for more conservative local provisions.

The Natural Hazards Report identifies that the development site is subject to a range of manageable natural hazard risks, with no significant constraints to development provided appropriate design and mitigation measures are implemented. The findings are:

- Alluvial fan features are present across the site; however, these are assessed as largely dormant historic landforms with no evidence of recent activity. While shallow overland flow and sheet flooding may occur during intense rainfall events, these risks can be effectively mitigated through appropriate stormwater design, including engineered channels, swales, and soakage systems integrated into the subdivision layout.

- In terms of seismic risk, while a nearby fault structure (Smallburn monocline) is identified, the long recurrence interval and low level of surface expression mean it poses a low constraint to typical residential development. The primary seismic risk is associated with the distant Alpine Fault, which may generate strong ground shaking; however, this is a regional risk that can be appropriately managed through standard building design in accordance with relevant codes.
- No significant landslide hazards have been identified within the site, and while geotechnical design will be required to ensure site stability during earthworks, the overall risk is low. Similarly, liquefaction risk is considered low due to the deep groundwater table across the site.

Overall, the preliminary hazard assessment concludes that natural hazard risks are either low or can be effectively mitigated through standard engineering and design responses, and do not represent a barrier to the proposed development.

In reference to the objective and policies of the NPS-NH, an assessment of the relevant provisions of the NPS-NH is as follows:

Table 6: Assessment of NPS-NH.

Provision	Description	Assessment
Objective 1	Natural hazard risk to people and property associated with subdivision use and development is managed using a risk-based proportionate approach.	Preliminary natural hazard assessments identify that while the site is subject to some natural hazard influences, including historic alluvial fan features, overland flow paths, and regional seismic risk, these hazards are generally low in severity or capable of being appropriately managed through standard engineering and design responses. The proposal adopts a proportionate response to these identified risks through integrated stormwater design, geotechnical design requirements, and compliance with relevant building standards. Overall, the assessment concludes that natural hazard risks do not represent a significant constraint to development of the site.
Policy 1	When considering natural hazard risk associated with subdivision, use or development, the risk level must be assessed using the risk matrix.	The Natural Hazard Report has detailed and assessed all potential natural hazards with reference to the NPS-NH Risk Matrix.
Policy 2	Natural hazard risk associated with subdivision, use and development must be managed using an approach that is proportionate to the level of natural hazard risk.	The identified hazards are either low in nature or can be effectively mitigated through conventional engineering and planning measures, including stormwater infrastructure, engineered drainage channels, swales, soakage systems, geotechnical design, and compliance with seismic building standards. The proposal does not rely on disproportionate or extraordinary mitigation measures to enable development.
Policy 3	Where subdivision, use or development is assessed as having very high natural hazard risk, that risk must be avoided.	The preliminary hazard assessments do not identify any areas of very high natural hazard risk across the site that would require avoidance. Historic alluvial fan landforms are considered largely dormant, no significant

		landslide hazards have been identified, liquefaction risk is low, and seismic risk is consistent with broader regional conditions experienced throughout Central Otago. Accordingly, there is no evidence that the proposal would locate development within areas subject to very high natural hazard risk.
Policy 4	Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.	The development is not expected to create or exacerbate significant natural hazard risks on adjoining or nearby land. Stormwater management has been incorporated as a key component of the master-planning process, with overland flow paths integrated into a coordinated drainage network comprising open channels, detention areas, piped conveyance systems, and landscaped green corridors. Preliminary hydraulic modelling indicates that stormwater can be appropriately managed within and downstream of the site. Accordingly, the proposal is not anticipated to increase flood or other hazard risks to surrounding properties, subject to detailed design and implementation of the proposed mitigation measures.
Policy 5	Natural hazard risk assessment and decisions must be based on the best available information and must be made even when that information is uncertain or incomplete.	As per the Natural Hazards Report, reliance is placed on the best information available to us at the time of the preliminary assessment which also considers residual risk.
Policy 6	The potential impacts of climate change to at least 100 years into the future must be considered.	As per the Natural Hazards Report, consideration of the impacts of Climate Change over at least a 100-year timeframe has been considered in the assessment.

Overall, the proposal is considered to be consistent with the NPS-NH.

8.1.3 National Policy Statement on Indigenous Biodiversity (NPS-IB)

The objective of this National Policy Statement is to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date⁶.

As per the EclA attached in **Appendix [I]**, given the existing orcharding operations across the site and the highly modified nature of the site generally, no indigenous vegetation communities or plant species were recorded on site. As such, the ecological values of the vegetation communities present on site was assessed as negligible with proposed vegetation removal not resulting in loss of indigenous habitat. The EclA generally concludes:

- Existing terrestrial ecological values on the Site are limited due to extensive historical modification and dominance by exotic vegetation. The proposed development will not result in loss of indigenous habitat.

⁶ Section 2.1(1)(a) of the NPS-IB.

- Avifauna observed were predominantly Not Threatened common species typical of modified rural environments, including paradise shelduck and welcome swallow.
- Desktop assessment identified the eastern New Zealand falcon/kārearea (*Falco novaeseelandiae*), Threatened – Nationally and Regionally, as having a Moderate likelihood of occurrence, and silvereye/tuhou (*Zosterops lateralis*), Threatened Regionally, as having a High likelihood of occurrence, although neither of these species were observed during site surveys.
- There is potential for avifauna species of ecological value to utilise the site, although the site provides limited, low-quality foraging habitat and no breeding habitat. Potential disturbance effects can be addressed through project design and construction management measures.
- Targeted lizard surveys confirmed the presence of McCann's skink (*Oligosoma maccanni*), a Not Threatened indigenous lizard species. Skinks were recorded at low densities in Exotic Grassland and Disturbed Areas. Based on the habitat present, history of modification, and only McCann's skink found during the survey, there is a low likelihood of any other lizard species being present on site.
- Although McCann's skink is a Not Threatened species, disturbance will require a Wildlife Act Authority (permit), and it is recommended that a Lizard Management Plan be prepared and implemented to mitigate effects.

Overall, the EclA concludes that there will be an overall Negligible to Low level of ecological effect from the proposed development provided ecological mitigation measures are implemented.

In consideration of the EclA, an assessment of the relevant policies⁷ of the NPS-IB are as follows:

Table 7: Assessment of NPS-IB.

Provision	Description	Assessment
Policy 1	Indigenous biodiversity is managed in a way that gives effect to the decision making principles and takes into account the principles of the Treaty of Waitangi.	Notification has been provided to all relevant iwi authorities, hapū, and Treaty settlement entities as required under s11 of the FTA and ongoing active consultation is occurring as the project progresses. This will enable opportunities for iwi authorities, hapū, and Treaty settlement entities to provide additional feedback and advice into ensuring that any decision making takes into account Te Tiriti, and enabling iwi authorities, hapū, and Treaty settlement entities to exercise kaitiakitanga for indigenous biodiversity.
Policy 2	Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through: (a) managing indigenous biodiversity on their land; and (b) identifying and protecting indigenous species, populations and ecosystems that are taonga; and (c) actively participating in other decision-making about indigenous biodiversity	

⁷ Policies that were considered not directly relevant to this proposal have not been included in this Table.

Policy 3	A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.	Despite the highly modified nature of the site, a precautionary approach has been applied through the commissioning of an Ecological Impact Assessment and targeted lizard surveys to identify potential ecological constraints and species present on site. While the site is highly modified and supports negligible indigenous vegetation values, the EclA nonetheless identified the potential presence of indigenous avifauna and confirmed the presence of McCann's skink. Appropriate mitigation and management responses are proposed, including the preparation and implementation of a Lizard Management Plan and obtaining the necessary Wildlife Act Authority prior to vegetation clearance and earthworks. These measures ensure ecological effects are appropriately identified, managed, and minimised despite the overall low ecological values of the site.
Policy 8	The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.	Although the site is not identified as a Significant Natural Area (SNA), ecological values outside SNAs have been appropriately considered through the ecological assessment process. The EclA confirmed that the site comprises predominantly exotic vegetation associated with long-established orcharding activities and contains limited indigenous biodiversity values. Notwithstanding this, the proposal recognises the ecological importance of fauna potentially utilising the site, including indigenous bird species and McCann's skink, and incorporates management measures to avoid or minimise adverse effects on those values. The proposal is considered consistent with this Policy.
Policy 13	Restoration of indigenous biodiversity is promoted and provided for.	While the development site itself does not contain notable indigenous vegetation or habitats requiring restoration, the implementation of ecological management measures and the opportunity for future landscaping and planting associated with development provides scope for ecological enhancement over time. Any proposed revegetation or landscaping utilising indigenous species would further support the intent of this policy more so than the current land use. The proposal is therefore consistent with Policy 13.
Policy 14	Increased indigenous vegetation cover is promoted in both urban and nonurban environments.	Existing vegetation across the site is dominated by exotic orchard plantings and modified grassland, with no indigenous vegetation communities identified. While the proposal will not result in the loss of indigenous vegetation, there is opportunity through future landscape treatment and amenity planting to incorporate indigenous species and contribute to increased

		indigenous vegetation cover within the developed environment. The proposal is considered consistent with this policy.
Policy 15	Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.	The ecological assessment identified the potential for highly mobile indigenous avifauna, including kārearea and silvereye, to utilise the site for limited foraging purposes. However, no breeding habitat was identified and habitat values were assessed as low quality. The assessment appropriately identifies these species and evaluates their potential use of the site, with mitigation and construction management measures proposed to minimise disturbance effects during development. Given the limited ecological function of the site, the proposal is not expected to adversely affect the wider populations or natural range of these species. The proposal is considered consistent with Policy 15.
Policy 17	There is improved information and regular monitoring of indigenous biodiversity.	The proposal is consistent with this policy insofar as it contributes to improved ecological information through the preparation of the Ecological Impact Assessment and targeted lizard surveys. These investigations have provided a robust understanding of the ecological characteristics and species present on site, including confirmation of McCann's skink. Ongoing monitoring and management measures associated with the recommended Lizard Management Plan and Wildlife Act Authority process will further ensure ecological effects are appropriately managed during development. The proposal is considered consistent with Policy 17.

Overall, the proposal is considered to be consistent with the NPS-IB.

8.1.4 National Policy Statement for Highly Productive Land 2022 (NPS – HPL)

The NPS-HPL defines (in clause 1.3) *highly productive land* as land that is mapped in accordance with clause 3.4 and included in an operative regional policy statement in accordance with clause 3.5. Until these maps are included in an operative regional policy statement, clause 3.5(7) identifies land that is to be treated as highly productive land.

As the ORC hasn't mapped the land in accordance with clause 3.4 the definition reverts to the definition in clause 3.5(7) which states that:-

7. Until a regional policy statement containing maps of highly productive land in the region is operative, each relevant territorial authority and consent authority must apply this National Policy Statement as if references to highly productive land were references to land that:

a. is:

*i. zoned general rural or rural production at the commencement date;
and*

ii. LUC 1, 2 or 3; but

b. is not:

*i. identified for future urban development at the commencement date;
or*

*ii. subject to a council initiated, or an adopted, notified plan change to
rezone it from general rural or rural production to urban or rural
lifestyle at the commencement date; or*

*iii. subject to a resource consent application for subdivision, use or
development on LUC 3 land for any activity other than rural lifestyle,
where that consent has been lodged at or after the commencement
date.*

Although the site includes land zoned rural, which is classed as LUC3, it will (by this proposed application) be subject to a resource consent for subdivision, and therefore will not meet the definition of highly productive land for the purposes of the NPS-HPL at the time the application is made and determined. Accordingly, the NPS-HPL is not applicable to this project.

8.1.5 National Policy Statement on Freshwater Management 2020 (NPS-FM)

The National Policy Statement for Freshwater Management 2020 (NPS-FM) sets out the objectives and policies for freshwater management under the Resource Management Act 1991.

The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:

1. first, the health and well-being of water bodies and freshwater ecosystems
2. second, the health needs of people (such as drinking water)
3. third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

The proposal is considered to be generally consistent with the NPS-FM for the following reasons:

- The EclA did not identify any natural water courses.
- All earthworks and construction activities will be undertaken in accordance with an Environmental Management Plan to ensure sedimentation, dust and erosion control measures are appropriately implemented to manage such effects.

- All stormwater management will be undertaken in accordance with best practice and in coordination with Council.
- All wastewater discharges will be managed by way of reticulation to Council's public network. No onsite discharges will occur.

Overall, the proposal will maintain or enhance freshwater outcomes and aligns with the objectives and policies of the NPS-FM.

8.2 New Zealand Coastal Policy Statement (NZCPS)

The NZCPS sets out objectives and policies for managing activities within the coastal environment of New Zealand. As the proposed development is not located within or near the coastal environment, the NZCPS is not considered relevant to this proposal.

8.3 National Environmental Standards

The relevant National Environmental Standards (**NES**) applicable to this Project include:

- National Environmental Standards for Freshwater 2020 (NES-FW)
- National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011, relating to the disturbance of potentially contaminated land. (NES-CS)
- National Environmental Standards for Detached Minor Residential Units (NES-DMRU)

8.3.1 National Environmental Standards for Freshwater 2020 (NES-FW)

The NES-FW sets out requirements for carrying out certain activities that pose risks to freshwater and freshwater ecosystems. Anyone carrying out these activities will need to comply with the standards.

As per the EclA, the site does not contain any natural inland waterbodies and therefore the NES-FW is not considered inherently applicable.

8.3.2 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011, relating to the disturbance of potentially contaminated land (NES-CS)

As previously noted, a combined Preliminary and Detailed Site Investigation has been undertaken. This has concluded that historical and modern orchard activities have resulted in elevated copper and zinc concentrations across much of the site, consistent with long-term spray use. It is highly unlikely that contaminants in soil would pose a risk to human health under the proposed land use, and widespread remediation for human health is not required. Ecological risks, particularly phytotoxicity from high copper concentrations, will require consideration during landscape design, soil reuse, and earthworks planning.

8.3.3 National Environmental Standards for Detached Minor Residential Units (NES-DMRU)

The NES-DMRU, which came into force on 15 January 2026, provides a consistent nationwide framework enabling the construction of a detached minor residential unit (DMRU)

of up to 70 m² on a site containing a principal dwelling, without the need for resource consent, provided specified standards are met.

Under the NES-DMRU, one detached minor residential unit per site is a permitted activity within residential, rural, mixed-use, and Māori purpose zones, provided the development complies with relevant standards including maximum floor area, building coverage, and minimum setbacks from boundaries and the principal dwelling.

Accordingly, the current regulatory framework anticipates and enables the establishment of an additional small residential unit on many sites as a permitted activity. The environmental effects associated with such development, including the presence of an additional dwelling, increased residential intensity, and associated domestic activity, are therefore contemplated by national direction and accepted as part of the permitted baseline where the standards are met.

The NES-DMRU has been considered insofar as the consideration of minor household units was had in the preparation of the Three Waters Feasibility assessments.

9 CONCLUSION

Overall, this report addresses the matters required under the Fast-track Approvals Act 2024 for a referral application and demonstrates that the proposal is appropriate for referral into the fast-track process. The proposal will deliver significant regional and national benefits through the provision of substantial additional housing supply, employment opportunities, business land, and supporting infrastructure within one of New Zealand's fastest growing regions. The development will assist in addressing identified residential and commercial land demand within Cromwell while contributing to the long-term social and economic wellbeing of the wider Central Otago community.

The proposal represents a logical and efficient urban growth outcome that aligns with the evolving urban form of the Cromwell Basin and the strategic growth direction identified through relevant planning documents, including the Cromwell "Eye to the Future" Masterplan. The proposal will create a well-connected and integrated urban environment with the existing urban area of Cromwell that is considered to support a sustainable and resilient community.

Comprehensive technical assessments have been undertaken across a broad range of disciplines including landscape, urban design, transport, Three Waters, economics, ecology, natural hazards, productive land, and contaminated land. These assessments conclude that potential adverse effects can be appropriately avoided, remedied, or mitigated through detailed design, staging, infrastructure upgrades, and conditions of consent. Of particular relevance, no technical assessments identify any fundamental constraints that would prevent development of the Site.

The proposal is also considered to be generally consistent with the relevant objectives and policies of the applicable statutory and strategic planning framework. In particular, the proposal supports objectives relating to housing and business land supply, coordinated urban growth, infrastructure integration, economic wellbeing, and efficient land use, while appropriately managing environmental effects and responding to the receiving environment.

Overall, the proposal will provide enduring positive social, economic, and urban development outcomes for Cromwell and the wider Central Otago region. The scale of public benefit arising from the proposal, together with the ability to appropriately manage environmental effects, strongly supports the project being referred and considered through the Fast-track Approvals process.

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