
Under	the Fast-track Approvals Act 2024
In the matter of	the substantive application for the Ōhoka Residential Subdivision project
Between	Carter Group Limited
	Applicant

MEMORANDUM OF COUNSEL FOR CARTER GROUP LIMITED

Date: 10 September 2026

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May it please the Expert Panel:

- 1 This memorandum of counsel is filed on behalf of Carter Group Limited (**Carter Group** or **Applicant**), the applicant for the Ōhoka Residential Subdivision project (**Project**).
- 2 As signalled to the Expert Panel (**Panel**) last week, the Applicant for files the following documents in support of the application:
 - (a) Revised scheme plans and updated road cross-sections;
 - (b) Transport Engineering Memorandum (supplementary to Appendix 15, provided as new Appendix 15(a));
 - (c) Revised Stormwater Management Report (update to Appendix 31);
 - (d) Revised Flood Effects Report (update to Appendix 22);
 - (e) Wastewater Technical Memorandum (supplementary to Appendix 28, provided as new Appendix 28(a));
 - (f) Water Supply Technical Memorandum (supplementary to Appendices 17(a) and (b) and is provided as new Appendix 17);
 - (g) Revised Water Supply Strategy (update to Appendix 29);
 - (h) Construction Earthworks Spring and Groundwater Monitoring Plan;
 - (i) Water Balance Memorandum (new Appendix 49);
 - (j) Revised Urban Design and Landscape Masterplan (update to Appendix 23(b), provided as new Appendix 23(b));
 - (k) Urban Design Assessment (update to Appendix 23(a), provided as new Appendix 23(b));
 - (l) Revised Landscape and Visual Impact Assessment (update to Appendix 23(a), provided as new Appendix 23(c));
 - (m) Draft Landscape Management Plan (provided as new Appendix 23(d));
 - (n) Aquatic Ecology Addendum (supplementary to Appendices 19(a) and (b), provided as new Appendix 19(c));
 - (o) Revised Lizard Management Plan (update to Appendix 24);

- (p) Revised Avifauna Assessment (update to Appendix 25);
 - (q) Updated Wetlands and Waterways Changes Plan (update to Appendix 47); and
 - (r) Revised Archaeological Authority Conditions (update to Appendix 46).
- 3 A summary of the updates and the accompanying documents is provided in the memorandum of Tim Walsh, planner for Carter Group, attached as **Appendix 1**. That memorandum explains the changes made to the application, identifies those documents that update earlier versions filed with the substantive application, and outlines the purpose of the supplementary technical memoranda, management plans and addenda that supplement the application.
- 4 The Applicant files the updated information in advance of the Panel issuing invitations to comment under section 53 so that the parties invited to comment (**Parties**) have the benefit of these documents when preparing their comments.
- 5 The Applicant respectfully requests that the documents be uploaded to the EPA website and made available to the Parties.

Dated this 10th day of September 2026



Ben Williams / Meg Davidson
Counsel for Carter Group Limited

APPENDIX 1

10 September 2026

Novo Group Limited

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MEMO

FROM: Tim Walsh
TO: The Expert Panel for the Ōhoka Residential Subdivision Project
PROJECT REF: 0021051

ŌHOKA RESIDENTIAL SUBDIVISION UPDATES TO THE SUBSTANTIVE FAST-TRACK APPLICATION

1. The applicant provides the accompanying updates and further material in relation to the application.
2. These have been prepared in response to the applicant's continuing engagement with the local authorities and administering agencies (and their technical advisers).
3. This memorandum is intended to assist the panel, and the parties invited to comment on the application, by summarising those updates and further material (and how they are to be read):
 - a. In several cases, the information has been prepared as an updated version of the previously provided reports, plans and assessments filed with the substantive application. This reflects the ongoing design development and matters raised through engagement with the local authorities, administering agencies and their technical advisers; and
 - b. Other documents comprise new technical memoranda, management plans and addenda that similarly provide further information, clarification and technical justification in relation to matters raised through that engagement. These documents are intended to supplement, rather than being read in the place of the original application material to which they relate.
4. For clarity, the applicant has not revised the proposed conditions of consent (except for the proposed conditions relating to the archaeological authority) at this stage. It is more efficient to further develop and refine the proposed conditions following receipt of the section 53 comments, when the panel and the parties will have the benefit of the matters raised through that process.

Design amendments

5. The revised scheme plans incorporate:
 - lots for the drinking-water supply bores,
 - a drinking-water supply headworks lot,



- a wastewater pump station lot,
 - changes to the stormwater management areas, with an associated reduction in the number of residential lots (from 879 to 856), and
 - changes to the road network.
6. The document titled Scheme Plans replaces Appendix 26 to the application.
 7. Updated road cross-sections have also been prepared following recent engagement with Waimakariri District Council. These replace pages 44 to 46 of the civil engineering plans in Appendix 27. The applicant acknowledges that the balance of the Civil Engineering Plans will need to be updated to reflect the revised subdivision layout. For efficiency, that work is intended to occur following the section 53 comments process.
 8. A transport engineering memorandum explains the applicant's response to recent Council feedback on the proposed subdivision road layout and the resulting amendments to the scheme plans and road cross-sections. The memorandum is supplementary to Appendix 15 (Integrated Transport Assessment) and is provided as new Appendix 15(a).

Stormwater and flooding

9. The revised stormwater management report does not alter the overall stormwater management approach. It substantially refines the original technical assessment by addressing the revised subdivision layout, the 2025 Waimakariri Engineering Code of Practice, updated flood modelling, more detailed runoff and attenuation calculations, and tailwater effects. It also assesses the design against the more stringent 100-year storm criteria and integrates the assessment of stormwater management and flood attenuation across the site.
10. The revised stormwater report replaces Appendix 31.
11. The revised flood effects report responds to technical feedback from Canterbury Regional Council and Waimakariri District Council. It includes a recalibrated hydraulic model, the latest subdivision design, assessment of the currently required 100-year event and a risk-based flood-hazard assessment. The revised modelling concludes that the proposal avoids significant adverse flood effects on existing dwellings and generally improves or maintains existing off-site flood conditions.
12. The revised flood report replaces Appendix 22.

Wastewater servicing

13. A wastewater technical memorandum responds to servicing questions raised by Waimakariri District Council's peer reviewer, Beca. It provides further information and justification concerning the proposed pressure sewer system, including the proposed Ōhoka pump station, interaction with the Bradleys Road wastewater scheme, hydraulic modelling, fatigue and transient analysis, emergency storage, wastewater flows, infiltration allowances and alternative servicing options.



14. The memorandum concludes that the proposed servicing approach is technically feasible. It also identifies matters to be refined through detailed design, including control logic, transient mitigation and operational requirements.
15. The memorandum is supplementary to Appendix 28 (Wastewater Assessment) and is provided as new Appendix 28(a).

Drinking water supply

16. A new water supply technical memorandum responds to questions raised by Beca regarding the proposed community drinking-water supply. It supplements the groundwater and water supply report and provides further information about how the supply would be established, tested, operated and regulated. It concludes that an on-site deep groundwater supply remains the preferred option. The memorandum is supplementary to Appendices 17(a) and (b) and is provided as new Appendix 17(c).
17. The revised water supply strategy also:
 - updates demand calculations to reflect the reduction from 879 to 856 residential lots;
 - assesses the Rangiora and Kaiapoi water-supply schemes as alternative sources; and
 - explains why a separate non-potable irrigation supply is not proposed for the polo field and stormwater management areas.
18. The revised water supply technical memorandum replaces Appendix 29.

Groundwater, spring flows and water balance

19. A draft groundwater and spring flow monitoring plan sets out the proposed framework for monitoring and assessing potential construction-earthworks effects on groundwater levels, spring flows and surface-water systems. It has been prepared following engagement with Canterbury Regional Council and records the baseline investigations undertaken to date, including seasonal spring and stream-flow gauging and groundwater monitoring.
20. The draft groundwater and spring flow monitoring plan is provided as supplementary information to support the assessment of effects.
21. A separate water balance memorandum assesses potential changes to groundwater recharge, stream depletion and the overall site water balance as the land changes from irrigated pasture to urban development. It compares pre-development and post-development conditions, including the effects of impervious surfaces and the proposed transition from shallow irrigation bores to deeper community water-supply bores.
22. The memorandum concludes that the reduction in land-surface recharge is offset during the irrigation season by reduced stream depletion from replacing shallow irrigation takes with deeper community supply bores. Overall, it concludes that effects on the water balance will be no more than minor and that the proposal is expected to improve the shallow-groundwater and surface-water balance during low-flow irrigation periods.



23. The water balance memorandum is provided as supplementary information to support the assessment of effects.

Urban design and landscape

24. Following Council feedback, DCM has prepared:
- a revised urban design assessment;
 - a revised landscape and visual impact assessment;
 - an updated urban design and landscape masterplan; and
 - a new draft landscape management plan.
25. The separate urban-design and landscape assessments replace the original combined assessment and are to be read alongside the updated Masterplan and Landscape Management Plan.
26. The updated material provides a more comprehensive explanation of the masterplan design rationale and responds to Waimakariri District Council concerns relating to landscape integration, urban form, settlement structure, accessibility and connectivity, urban-design and Crime Prevention Through Environmental Design principles, reserve and open-space provision, construction and cumulative effects, night-time effects, and planting establishment and maintenance.
27. The draft landscape management plan establishes a framework for implementing, establishing and maintaining the proposed landscape outcomes and mitigation measures. It addresses staging, planting timeframes, responsibilities, the establishment period, quality assurance, maintenance and replacement, and ongoing monitoring and reporting.
28. DCM's urban-design conclusions remain unchanged. The revised landscape and visual impact assessment adopts a more conservative assessment by increasing the assessed landscape effects from low-moderate to moderate, reflecting the permanent change from rural land to residential development. DCM nevertheless maintains its overall opinion that visual effects will reduce as planting matures and that the development will be experienced as a landscaped extension of Ōhoka.
29. The updated masterplan and assessments replace Appendix 23(a) and Appendix 23 (b) as follows:
- Appendix 23: urban design and landscape masterplan;
 - Appendix 23(a): urban design assessment;
 - Appendix 23(b): landscape and visual impact assessment; and
 - Appendix 23(c): draft landscape management plan.



Aquatic ecology

30. An addendum to the aquatic ecology assessment responds to a Canterbury Regional Council's technical review and provides further explanation and justification concerning effects on water quality and watercourses, together with the proposed mitigation, offsetting and monitoring framework.
31. The addendum concludes that, notwithstanding some unavoidable watercourse reclamation, the proposal can achieve no net loss of aquatic ecological values and an overall improvement in the site's aquatic environment. It describes a proposed network of restored streams, riparian corridors and aquatic habitats, together with monitoring and adaptive management. The addendum is supplementary to Appendices 19(a) and (b) and is provided as new Appendix 19(c).

Terrestrial ecology

32. The revised lizard management plan does not fundamentally alter the proposed salvage methodology, monitoring regime, fencing design, predator-control approach or habitat-enhancement philosophy. It adds a detailed implementation programme, integration with development staging, a quantified habitat-loss assessment, effects-significance ratings, an expanded relocation-site strategy, further mapping and more conservative adaptive-management triggers. The revised lizard management plan replaces Appendix 24.
33. The revised avifauna assessment incorporates an additional spring survey undertaken during the bird-breeding season, confirms the species present, assesses avifauna values and potential effects, and recommends management and mitigation measures. The assessment concludes that the site's avifauna habitat is of low ecological value, potential adverse effects are low, and residual effects are expected to be very low with the recommended measures in place.
34. The revised avifauna assessment replaces Appendix 25.

Wetlands and waterways plan

35. Minor amendments have been made to the wetlands and waterways changes plan to reflect the revised subdivision layout due to updated stormwater management areas.
36. The updated wetland and waterways plan replaces Appendix 47.

Archaeological authority

37. The proposed archaeological authority conditions have been revised following consultation with Heritage New Zealand Pouhere Taonga. Those conditions replace the conditions previously included in Appendix 46.
38. For clarity, the duration sought by the applicant for the archaeological authority is 15 years.



Assessment of effects on the environment

39. The information and assessments detailed above support the conclusions reached in the AEE and assessment of provisions in the application.
40. The applicant will continue to work with the administering agencies as the application progresses and will address outstanding technical and conditions matters through the comments process and its subsequent responses.

Yours sincerely,

Novo Group Limited

Tim Walsh

Consultant

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