

To: Listed Projects Team – Ministry for the Environment

From: Maisie Fisher / Rachel Morgan – Barker & Associates Limited

Date: 7 May 2026

Re: Planning Memorandum for Oaklands Estates Referral Application

1.0 Introduction

1.1 Overview

Oaklands Estates Nelson Limited is applying for a Referral Application under the Fast Track Approvals Act 2024 ('FTAA') for a residential development with supporting commercial service activities. The site is approximately 58 hectares and is located at 467 Suffolk Road, Stoke, Nelson. The site is currently utilised as a farm and is known as Oaklands Farm.

Key components of the proposal include:

- (1) Approximately 580 - 740 residential allotments, including the potential for a retirement village. Two concept masterplan options are proposed, one which includes the retirement village and the other which replaces this activity for additional residential housing. Two potential options for the location of the retirement village are shown and the western and eastern extents of the site.
- (2) Commercial areas comprising approximately 6,000m² – 7,800m² floorspace to service the development and surrounding area.
- (3) Open space and recreation areas including walking tracks, green links, water margins and stormwater management areas.



Figure 1: Elevated Perspective (looking east over the site) – indicative only.

Further detail on the proposed layout and is provided in the Graphic Attachment prepared by DCM Urban Design Limited (**Attachment 1**). This graphic attachment includes the two potential concept masterplans, elevated perspectives of the proposed development, a mitigation measures plan, interface environments and street typologies. All are indicative only.

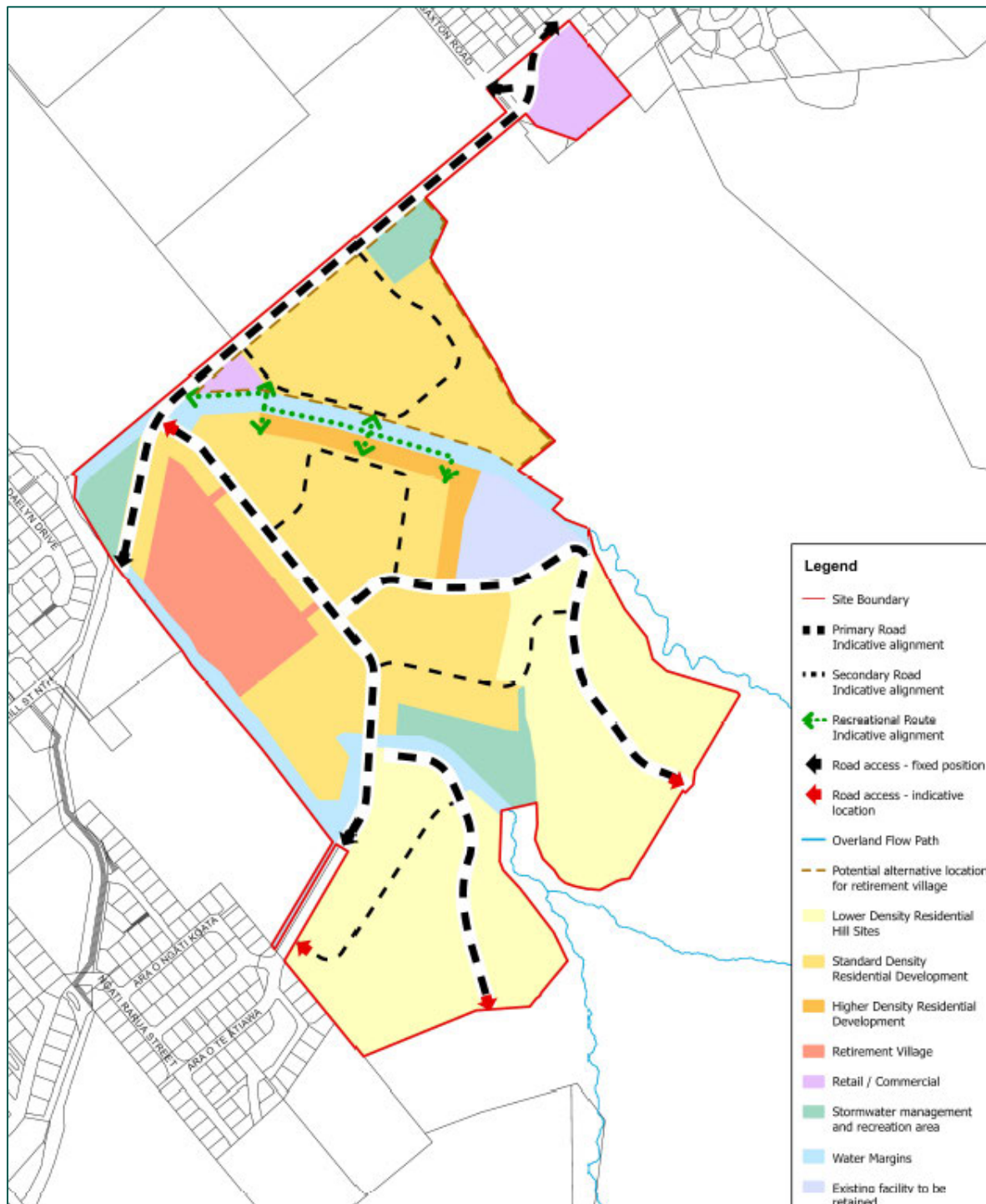


Figure 2: Showing the current proposal for the site layout, which is subject to discussion and change.

1.1.1 Transport

The proposed roading and access arrangement is set out within the Transport Assessment prepared by Abley (**Attachment 2**). In summary, the proposal includes the following transport measures:

- New roads are to be constructed in accordance with Nelson City Council requirements to provide access to the development as well as connectivity to the adjacent transportation network.
- Access to the wider network for all modes will be provided via a new road and intersection connecting to Suffolk Road and Saxton Road in Stoke and a connection to Ngati Rarua Street in Richmond.
- There is provision to extend a connection for all transport modes to Hill Street to the west of the site. Extending the connection would require land outside of the site which is currently not designated as road reserve. In the interim, the transport network proposed within the site allows the Council to complete this connection at a later date.
- The proposed road which leads to the existing milk bottling plant, as well as any ancillary connections to activities located on the wider side, will be designed to accommodate suitable truck access.
- Connections to the existing external walking and cycling network will be investigated through the preparation of the substantive application.
- Primary roading within the development will be designed to a suitable standard to enable future public transport services, including bus stop infrastructure in appropriate locations. The provision of these services is a matter for Nelson City Council.

1.1.2 Three Waters

The proposed three-waters strategy for the site is set out in the Infrastructure Report (**Attachment 3**) prepared by Inovo Limited. By way of summary, the follow strategies are proposed.

Stormwater

The site sits to the southeast of the Saxton Creek stormwater basins, with an additional open channel bisecting the site between the southeast and northwest corner discharging into Saxton Creek and downstream basins. The proposed stormwater management measures are summarised below:

- Stormwater will be directed towards roads, where it will then be conveyed within reticulation to new or existing stormwater basins for attenuation, before being discharged to either Saxton Creek or Orphanage Stream.
- All infrastructure will be constructed and designed in accordance with the Nelson Tasman Land Development Manual ('NTLDM').
- It is proposed to reshape/naturalise the existing open channel drains through the site, including vegetation buffers and ecological enhancement.

Stormwater upgrades of the Saxton Creek stormwater facility, completed in 2020, has allowed for the redevelopment of a portion of the site. Where development has not already been allowed for within existing facilities, new stormwater attenuation basins will be constructed in line with the NTLDM.

Water supply

The Oaklands Development is intended to be supplied with water from the existing 200mm trunk watermain along the site's northern boundary. Consultation with Nelson City Council has confirmed that connecting

from this trunk main with limited take-offs is the preferred approach for servicing the development. A maximum of two connections from this main are anticipated. A supplementary connection to the existing Saxton Road East watermain is proposed to improve resilience and provide a secondary feed path.

Sufficient capacity and pressure have been identified in the existing external network to service a portion of the development. Future upgrades will be required to service the full development. To accommodate the upper reaches of the development, it is proposed to install a new reservoir at the southeastern extent of the site. The new reservoir will ensure adequate supply pressures and water volumes can be accommodated for the completed development. The reservoir will be protected by appropriate legal rights in favour of Nelson City Council. All works will be designed and constructed in accordance with the requirements of the NTLDM.

Wastewater

The site is located within the Wakatu Pump Station catchment of the Nelson City Council's existing public wastewater network. Nelson City Council has confirmed that there is adequate capacity in the existing infrastructure to service the proposed development. Multiple connection locations will be utilised, providing flexibility to service the various areas of the proposed development using the most practical connection points.

Nelson City Council has advised that upgrades to the Wakatu Pump Station are planned in the early part of the 2027 to 2037 Long Term Plan. These upgrades are expected to provide the downstream capacity required to service the proposed subdivision and will be timed to coordinate with development on the site. This has been confirmed with Nelson City Council.

1.1.3 Power and Telecommunication

Consultation with Network Tasman has confirmed that the existing overhead 11 kV line crossing the northern portion of the site can be undergrounded. The design and implementation of these works are to be undertaken in accordance with the relevant standards and the utility provider's requirements.

Network Tasman has confirmed the ability to service 750 allotments, with a Confirmation of Capacity certificate provided as part of the Infrastructure Report. Network Tasman has also requested that the Applicant provide a new Zone substation site within the development to support wider network resilience. The details of this will be finalised during detailed design and coordinated with Network Tasman.

Subsequent stages of design will confirm the number and location of kiosks required to service the proposed development density. Each lot would be provided with an electricity supply connection and fibre connection at or near the boundary.

Streetlighting will be provided in accordance with the applicable residential road standards.

2.0 Site Context

2.1 The Site

The wider site is approximately 209 hectares comprising a single, irregularly shaped land parcel. The application relates to a 58-hectare portion of the site. The legal descriptions for the wider site include the following:

- Lot 8-9 Deposited Plan 527984;

- Lot 4 Deposited Plan 13154; and
- Part Lot 1-2 Deposited Plan 6053.

The registered owner of the site is Raine Estate “Oaklands” Limited, however, Oaklands Estates Nelson Ltd has a Sale and Purchase Agreement in place with the landowner. As such, Oaklands Estates Nelson Ltd has control of this property and can give effect to the development proposed over this site.

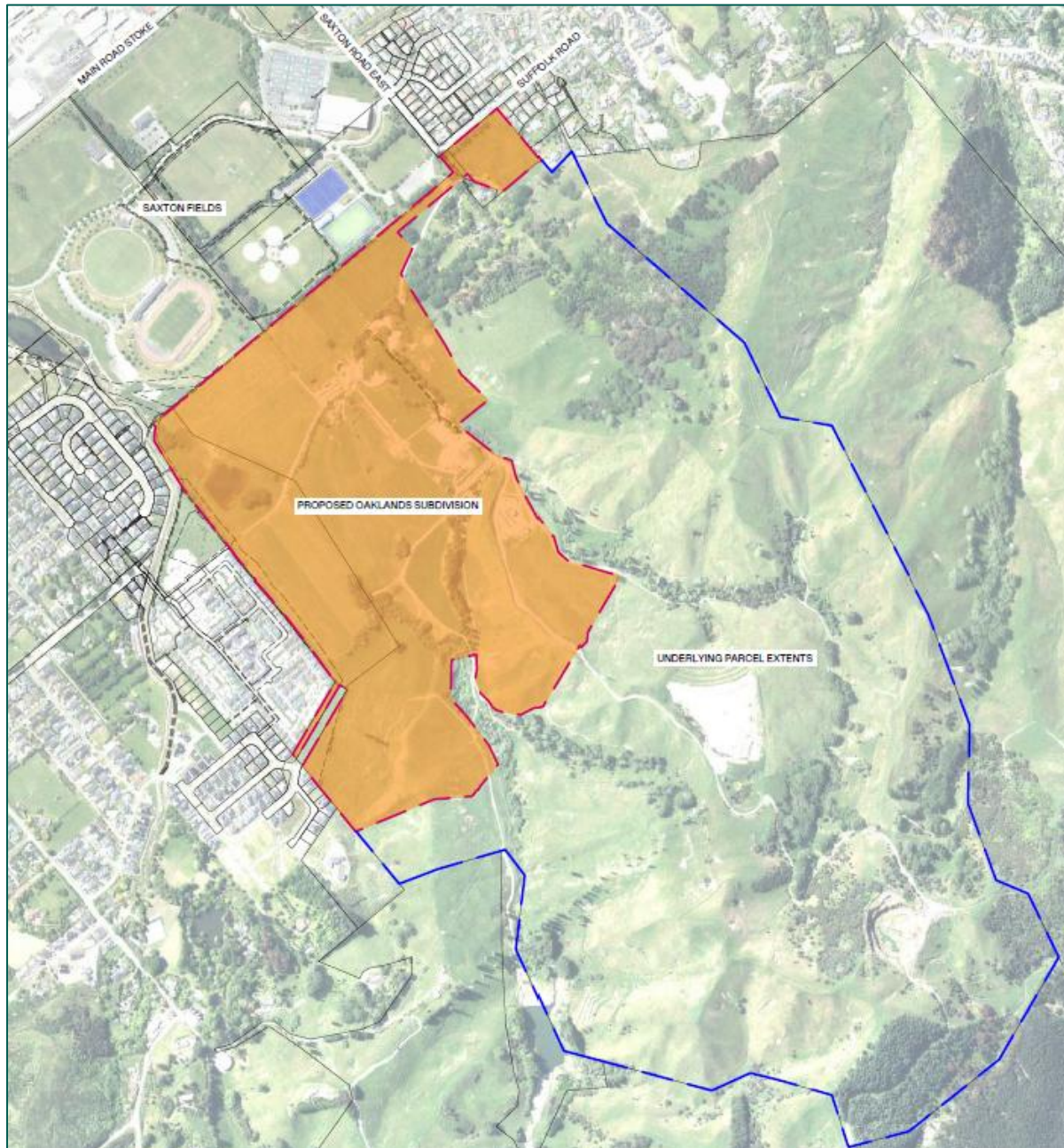


Figure 3: Site Locality Plan.

The wider site currently operates as Oaklands Farm, with the balance land following the proposed subdivision intended to retain this existing farm use. Some works are proposed in this area, including a reservoir and potentially restoration/offset planting along riparian margins if that is required.

The land within the site largely consists of pasture, with areas of mature vegetation located throughout the site. The site is located on the southeastern side of Saxton Field Recreation Reserve, with the surrounding

land uses comprising residential development and a retirement village to the west, rural farmland to the south and residential development to the northeast along Suffolk Road.

The site is located within the Suffolk Road foothill margin. The north and northwestern third of the site adjoining Saxton Field is relatively flat, while the remaining south to southeastern portion of the site characterised by rolling to moderately sloping terrain, of which is positioned at the base of more prominent spurs and ridgelines. The area of the site located in the eastern corner, identified for the commercial allotment, is characterised by moderately sloping terrain and is currently occupied by the existing Oaklands Farm dwellings.

Saxton Creek is the primary watercourse associated with the site; in addition, the ecological assessment prepared by Viridis Limited (**Attachment 4**) identifies multiple additional waterways present throughout the site. There is a man-made pond in the northeastern portion of the site. In addition, there is one confirmed natural inland wetland and one likely natural inland wetland present at the site, which would need to be assessed in more detail as part of a substantive application.

The records of title and interests are provided as **Attachment 10**, with a summary of the relevant interests also provided as **Attachment 11**.

2.2 Nelson Resource Management Plan – Zoning, Overlays, Controls and Designations

The land to be developed as part of this application is located in the Rural Zone of the Nelson Resource Management Plan ('NRMP'). The following additional overlays apply to the site under the NRMP:

- Airport height restrictions.
- Heritage:
 - Heritage and Landscape Trees contained in a heritage and landscape woodland.
 - A Group 'A' Heritage Building (old homestead).
- Landscape Overlay.
- Land Management Overlay.
- Natural Hazards:
 - Fault Hazard Overlay.
 - 'Liquefaction Damage is Unlikely' and Very Low Liquefaction Vulnerability'.
- Electrical Transmission Lines:
 - Voltage (kV): 33.
 - Voltage (kV): 50.
 - Voltage (kV): 110.
 - Voltage (kV): 220.
- Riparian Overlay (Saxton Creek).

Nelson City Council ('NCC') has recently made provisions as part of Plan Change 29 operative under the NRMP. Operative provisions relate to components such as building heights, development standards, natural hazards and papakāinga development, however, none of the now operative provisions apply to the rural

zone/environment. As a result, Plan Change 29 does not propose any changes to the zoning and overlays that apply to the site under the NRMP.

2.3 Regional Significance of the Project

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

In summary, the proposal is a project that will create economic benefits and address housing needs in Nelson in terms of supply, type and scale that will provide significant regional benefits. The substantial scale of the proposal will enable approximately 580-740 residential allotment (potentially with a retirement village) and a new commercial centre. Furthermore, despite the Rural Zone applying, the proposal is generally consistent with the relevant strategic outcomes identified in the local and regional planning documents as set out below.

Section 22(2)(a)(i) – has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list:

While the specific development is not explicitly listed as a priority in a central government, local government, or sector plan or strategy, the site has been identified in the Nelson Tasman Future Development Strategy ('NTFDS') (2022 – 2052) as a greenfield expansion area. Greenfield expansion areas are identified across the Nelson Tasman area in the NTFDS as key locations to help deliver the housing capacity required over the next 30 years.

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

The Economic Assessment prepared by Insight Economics (provided as **Attachment 5**) sets out the economic benefits that will be delivered by the proposal. In summary these include:

- Approximately 1,630 full time equivalent ('FTE') years of employment.
- \$145 million in wages and salaries.
- Approximately \$292 million in GDP.
- Approximately 95 additional FTE's from the commercial component on an ongoing basis, alongside an additional \$6 million in annual wages and salaries and more than \$10 million in annual GDP.
- The development will result in a material increase in available housing supply in Nelson's constrained housing market.
- The development will contribute to improving the land market competition in Nelson and support a well-functioning urban environment.
- The opportunity cost associated with the foregone rural production is negligible when compared with the scale of the proposal's housing and economic benefits.

The Economic Assessment concludes that there is a constrained supply of land that is available and readily developable for residential purposes within the Nelson-Tasman region, this constraint is likely to become more acute over time. The proposal directly responds to and helps address this issue, while also contributing to a well-functioning urban environment and generating significant regional economic benefits, as described

above. The Fast Track process will enable those benefits to be realised sooner than traditional consenting pathways.

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

The proposal will support the minimisation of greenhouse gas emissions as it promotes a consolidated urban form by delivering coordinated residential development in a planned and serviced location that immediately adjoins the urban boundary, rather than enabling dispersed rural or ad hoc development. Concentrating growth in proximity to urban areas, employment, education and community facilities reduces vehicle kilometres travelled and supports lower transport-related emissions over the long term.

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

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

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

Overall, the proposal is consistent with the relevant local and regional planning documents, as set out in section 6 below.

2.4 Benefit of the Fast-Track Approvals Act (2024) for the Proposal

As outlined in Section 22(1)(b)(i) and (ii), part of the determination for accepting a referral application includes outlining whether the FTAA (2024) process would facilitate a more efficient and timely delivery of the project;

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

- i. would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and*
- ii. is unlikely to materially affect the efficient operation of the fast-track approvals process.*

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

- Under the Fast-track Approvals Act 2024, expert panels will consider required approvals as a single application package, as opposed to the normal process where several applications would be required for the different activities and to different authorities;
- Under the Fast-track Approvals Act 2024, public and limited notification is precluded, expert panels are only permitted to invite comments from specified persons who have a short timeframe to provide comment. Given the scale of this development and without a live-zoning in place, the proposal would likely be a fully notified application under the RMA which would significantly slow down the consenting

process and add to cost, taking into account the appeal rights enabled under the standard RMA process;

- Under the Fast-track Approvals Act 2024, timeframes are shorter and stricter than that of the normal process resulting in significant less time for obtaining resource consent and efficiencies for the project; and
- There is resourcing in place to process the application efficiently and certainty around timeframes for the applicant to ensure the project remains 'shovel ready'.

3.0 Relevant Background

3.1 About Oaklands Estates Nelson Ltd

Oaklands Estates Nelson Ltd has been established to advance the Oaklands residential development in Stoke, Nelson. The project is led by Justin McDonald, Director of Oaklands Estates Nelson Ltd, Urban Estates, Que Homes and Mon Group, who has extensive experience in land acquisition, greenfield subdivision, infrastructure coordination, residential construction, commercial construction and leasing.

Justin has over 25 years' experience across the full development cycle, including site identification, commercial feasibility, land acquisition, masterplanning, planning and consenting, infrastructure negotiations, consultant coordination, funding, civil delivery, residential and commercial construction, sales, leasing and settlement.

The land development experience includes previous and current involvement in a number of significant residential growth areas across Canterbury, including the well-known Broadfield Grange development in Rolleston, as well as Delpre, Sandhurst, Silverstone, Birchfields, The Hamptons, Lockhead Farm and other residential projects across Christchurch, Prebbleton, Halswell and the wider Selwyn district. To date, Justin and his team have delivered approximately 750 greenfield residential lots, with a further 4,000 lots in planning or progression. In addition, has delivered approximately 600 homes, including standalone dwellings, duplexes and townhouses.

The team have demonstrated a proven ability to acquire land, secure approvals, coordinate infrastructure, fund development, complete housing and bring residential communities to market. Oaklands Estates Nelson Ltd has the practical capability to progress the Oaklands proposal from approval through to implementation. The team understands that fast-track approval carries an expectation of timely delivery and is committed to working constructively to deliver a well-planned residential community that contributes meaningfully to Nelson's future housing supply.

4.0 Reasons for Consent

4.1 Nelson Resource Management Plan ('NRMP')

At this preliminary stage, we have identified that the proposal would require resource consent under the NRMP for the following reasons:

Chapter 12 – Rural Zone

- Any activity that does not comply with the relevant standards in the Rural Zone Chapter for permitted activities is a **discretionary activity** pursuant to rule RUr.20.3.
- Activities that are open to the public which contravene the permitted closing time standards are a **discretionary activity** pursuant to rule RUr.23.3.
- The clearance of indigenous forest that contravene the permitted activity standards is a **discretionary activity** pursuant to rule RUr.24.3.
- The clearance of vegetation other than indigenous forest that contravenes the permitted activity standards is a **discretionary activity** pursuant to rule RUr.25.3.
- Soil disturbance that contravenes a permitted and controlled activity conditions is a **restricted discretionary activity** pursuant to rule RUr.26.3.
- Earthworks that contravene a permitted and controlled activity conditions are a **restricted discretionary activity** pursuant to rule RUr.27.3.
- All buildings that do not comply with a permitted activity condition are a **discretionary activity** pursuant to rule RUr.28.3.
- All buildings located on low lying sites that do not meet the permitted activity conditions are a **restricted discretionary activity** pursuant to rule RUr.29.3.
- Building over or alongside drains and water mains that do not comply with the permitted and controlled activity conditions is a **discretionary activity** pursuant to rule RUr.31A.3 respectively.
- Buildings that exceed 12m in height are a **discretionary activity** pursuant to rule RUr.32.3.
- Construction or alterations to structures and impervious areas on sites with more than 2,500m² site coverage is a **discretionary activity** pursuant to rule RUr.33.3.
- Parking, loading, manoeuvring and set down areas that do not comply with the Appendix 10 transport standards are a **discretionary activity** pursuant to rule RUr.35.3.
- Vehicle accessways that are not provided in accordance with Appendix 11 are a **discretionary activity** pursuant to rule RUr.36.3.
- Signs that do not comply with the permitted conditions are a **discretionary activity** pursuant to rule AP20r.7.3.
- Residential units located within the required setbacks to electrical transmission lines are a **discretionary activity** pursuant to rule RUr.42.3.
- Structures on the road reserve that do not comply with the permitted activity conditions are a **discretionary activity** pursuant to rule RUr.43.3.
- Minor upgrading of electricity transmission lines and support structures that does not comply with the permitted activity conditions is a **discretionary activity** pursuant to rule RUr.45.3.
- The construction of any new roads that do not comply with the Nelson Tasman Land Development Manual ('NTLDM') is a **discretionary activity** pursuant to rule RUr.46.3.
- Activities that exceed the permitted thresholds for noise in Residential Zones or from within the notional boundary of any rural dwelling are a **discretionary activity** pursuant to rule RUr.47.3.

- New residential units in the landscape overlay are a **controlled activity** pursuant to rule RUr.54.2. While all other new structures in the landscape overlay are a **discretionary activity** pursuant to rule RUr.54.3.
- Minor upgrading of electricity transmission lines and support structures within the Landscape Overlay that does not comply with the permitted activity conditions is a **discretionary activity** pursuant to rule RUr.55.3.
- Earthworks in the landscape overlay are a **discretionary activity** pursuant to rule RUr.56.3.
- Activities on land identified with riparian values are a **discretionary activity** pursuant to rule RUr.58.3.
- Erection, extension or alteration of a building within the Fault Hazard Overlay may be a **restricted discretionary activity** subject to compliance with the permitted activity conditions pursuant to rule RUr.60.3.
- Construction of a new building on the same site as a 'Group A' heritage building is a **controlled activity** pursuant to rule RUr.65.2.
- Trimming of heritage trees that contravenes a permitted activity condition is a **discretionary activity** pursuant to rule RUr.68.3.
- Trimming of landscape trees that contravenes a permitted activity condition is a **controlled activity** pursuant to rule RUr.69.2.
- Activities within the root protection zone of a listed heritage or landscape tree that contravene a permitted activity condition is a **discretionary activity** pursuant to rule RUr.70.3.
- The removal of any listed heritage or landscape trees is a **non-complying activity** or a **discretionary activity** respectively, pursuant to rule RUr.71.3.
- Subdivision in the Rural Zone that contravenes a controlled activity condition is a **discretionary activity** pursuant to rule RUr.78.3.
- Subdivision within the landscape overlay that contravenes a controlled or discretionary activity condition is a **non-complying activity** pursuant to rule RUr.80.3.
- Subdivision of land containing a heritage feature is a **discretionary activity** pursuant to rule RUr.81.3.
- Subdivision of land containing a natural hazard overlay is a **discretionary activity** pursuant to rule RUr.82.3.

Appendix 28: Freshwater

- The disturbance of river and lake beds, and wetlands that do not comply with the permitted activity or controlled activity conditions are a **discretionary activity** pursuant to rule FWr.1.3. Additionally, activities that disturb the bed of a wetland, other than as provided for as a permitted activity, is a **non-complying activity** pursuant to rule FWr.1.3.
- Planting in riverbeds and margins, and in wetlands that does not comply with the permitted activity conditions are either a **discretionary** or **non-complying activity** pursuant to rule FWr.3.3.
- Maintenance, replacement, upgrade and removal of structures in the beds of rivers and lakes and their margins (excluding dams) that does not comply with the permitted or controlled activity conditions is a **discretionary activity** pursuant to rule FWr.4.3.

- Bridges, culverts or fords that do not comply with the permitted or controlled activity standards are a **discretionary activity** pursuant to rule FWr.5.3.
- The removal of obsolete structures in the beds of rivers that do not comply with the permitted activity standards is a **controlled activity** pursuant to rule FWr.7.2.
- The deposition of material in the beds and on the banks of rivers and wetlands that does not comply with the permitted activity standards is a **restricted discretionary activity**, or a **discretionary activity** pursuant to rule FWr.9.3.
- The realignment and piping of the beds of rivers and lakes and wetlands that does not comply with the permitted activity conditions is a **discretionary activity** pursuant to rule FWr.10.3.
- The take, use or diversion of surface water that does not comply with the permitted activity conditions is a **restricted discretionary activity**, **discretionary activity** or a **non-complying activity** pursuant to rule FWr.12.3.
- The temporary diversion of surface water that does not comply with the permitted activity conditions is a **discretionary activity** pursuant to rule FWr.13.3.
- The take, use or diversion of groundwater that does not comply with the permitted activity conditions is a **discretionary activity** pursuant to rule FWr.14.3.
- The take or use of water from ponds, reservoirs or dams that does not comply with the permitted activity conditions is a **discretionary activity** pursuant to rule FWr.15.3.
- Point source discharges to freshwater bodies (other than stormwater) that does not comply with the permitted activity conditions is either a **restricted discretionary**, **discretionary** or **non-complying activity** (noting that prohibited activities are not anticipated to be proposed), pursuant to rule FWr.20.3.
- Point source stormwater discharges to water that does not comply with the permitted activity conditions is a **discretionary activity** pursuant to rule FWr.22.3.
- General discharges to land where it may enter water that does not comply with the permitted activity conditions is a **discretionary activity** (noting that non-complying or prohibited activities are not anticipated to be proposed), pursuant to rule FWr.25.3.

Overall, under the NRMP, the proposal would require consent as a **non-complying activity**.

4.2 Nelson Air Quality Plan

The Nelson Regional Air Quality Plan ('NRAQP') manages Nelson's air resource. At this stage we have not identified any reasons for consent under the NRAQP. However, this determination is based on the information available to date, noting that further consent triggers may be identified as the proposal develops.

Should the Applicant wish to install wood burners then resource consent may be required under the NRAQP. Noting that the site is currently located outside of the 'Urban Area' under the NRAQP and therefore, small scale solid fuel burning appliances are permitted (provided no fuels listed as prohibited are burnt). It is not anticipated that material listed as prohibited would be burnt if wood burners were proposed.

4.3 National Environmental Standard for Freshwater

Resource consents will likely be required for a range of reasons under the National Environmental Standards: Freshwater (NES:F), including earthworks or, vegetation clearance within 10m of a natural inland wetland, or the diversion of water or the discharge of water into water within 100m of a natural inland wetland. Reclamation of some streams and wetlands with lower ecological values may be required to facilitate development. This may include prohibited activity status for works affecting a natural inland wetland, given that the site is not within an urban zone and therefore may not qualify for the urban development exclusion under rule 45C of the NES:F.

The ecological assessment (**Attachment 4**) confirms there is one natural inland wetland present in the north-west corner of the site. Additionally, there is a potential second wetland located in the centre of the site and a third non-natural wetland present at the site's northern boundary. Finally, an additional area was identified which contained vegetation indicative of wetland conditions.

More detailed work will confirm if work around wetlands triggers a prohibited activity status by way of Regulation 53 of the NES:F. Regardless, s21(7) of the Fast-track Approval Act enables the Minister to accept a referral application for an activity that is prohibited under the Resource Management Act 1991. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

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

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('NES:CS') sets a nationally consistent set of planning controls and soil contaminant values.

Given the historical and existing rural uses of the site, it is likely that the provisions of the NES:CS will apply to future residential development at the locations where HAIL activities are likely to have occurred. Although, it is worth noting that a review of the Nelson City Council's Hazardous Activities Industrial List ('HAIL') does not identify the site as being subject to a HAIL activity. A preliminary and detailed site investigation involving a review of the site's historical land uses and targeted soil sampling will be undertaken at the site will be undertaken in support of the substantive application. This will ascertain whether NES:CS consents are required to be sought in support of the application. It is likely that consent will be required pursuant to the NES:CS.

4.5 Other Approvals

4.5.1 Wildlife Act Authority (Permit)

A Wildlife Approval may be required under the Wildlife Act from the Department of Conservation for the relocation of skinks within the site. In this case, as the site is large, it is prudent to apply for this permit in the event that skinks need to be relocated when suitable vegetation is cleared (e.g. weedy vegetation / rank grass).

A high-level ecological assessment was prepared by Viridis to support the proposal (provided as **Attachment 4**) which found that there are records of skinks present in the wider area, therefore it is considered likely they will be present on the site given suitable habitat. During the preparation of a substantive application,

confirmation will be provided on whether suitable habitat is present at the site and whether a Wildlife Act Authority is required to capture and relocate lizards.

No other permits are requested.

4.5.2 Archaeology Authority

An archaeology authority under section 48 of the Heritage New Zealand Pouhere Act 2014 is required to be obtained to support the proposal due to the risk of pre-1900 archaeological evidence being present within the development area. A preliminary archaeological assessment has been undertaken by Amanda Young Archaeology (provided as **Attachment 6**) which confirms this authority will be required. This assessment concludes that subject to the appropriate authority, mitigation measures and consultation being undertaken, the risk of modification and/or destruction of pre-1900 archaeological evidence would be appropriately managed.

5.0 Consultation

In preparing this application consultation has been undertaken with Nelson City Council, Department of Conservation, Heritage New Zealand Pouhere Taonga, and Iwi. An overview of the consultation undertaken and the feedback received is outlined in **Attachment 7**.

The applicant has undertaken engagement and consultation with key stakeholders, and the outcomes are summarised below.

- **Iwi:** All Iwi with interests in the area have been contacted and invited to engage on the project. A hui with Ngāti Kuia, Ngāti Apa ki te Rā Tō, Ngāti Rārua, Ngāti Koata, Ngāti Toa Rangatira (present); Rangitāne o Wairau (following); Te Ātiawa and Ngāti Tama (apologies, information provided for follow-up) was held on 28 April 2026. The hui identified the key values and priorities, and the key issues and themes raised by iwi during the Phase 1 engagement for the project. A copy of the Iwi Engagement Outcomes Report is provided as **Attachment 8**.
- **Nelson City Council ('NCC'):** Consultation with NCC has occurred via a pre-application meeting on 31 March 2026 and ongoing weekly discussions with senior management within Council. Feedback on several preliminary items was provided by NCC prior to the formal consultation request, and this included discussions around coordinating infrastructure provision. Discussions with NCC are constructive and on-going. A copy of the letter from NCC confirming that the Applicant has consulted with them is included in **Attachment 7**.
- **Department of Conservation ('DoC'):** Pre-lodgement consultation was initiated via formal application to DoC email at Fasttrackapplicationenquires@doc.govt.nz. Given the outcome of the ecological assessment, it was determined detailed consultation with DoC would be appropriately undertaken through the preparation of a substantive application, and at this stage, an initial notification of the proposal would be sufficient.
- **Heritage New Zealand Pouhere Taonga:** Pre-lodgement consultation was initiated via a formal Heritage NZ email at ISouthern@heritage.org.nz. Subsequently, Heritage NZ were provided with an overview of the project and the draft archaeology assessment prepared by Amanda Young Archaeology (provided as **Attachment 5**). An initial hui was undertaken with Heritage NZ on the 22nd of April 2026. Engagement with Heritage NZ is primarily in relation to the Heritage New Zealand Pouhere Act 2014 and the

authority to modify process. Engagement with Heritage NZ will be ongoing as part of the preparation of a substantive application.

A summary of consultation undertaken and copies of the feedback received is included at **Attachment 7**.

5.1 Treaty Settlements

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

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

- Rangitāne o Wairau;
- Ngāti Kuia;
- Ngāti Apa ki te Rā Tō;
- Ngāti Koata;
- Ngāti Rārua;
- Ngāti Tama ki Te Tau Ihu;
- Te Ātiawa o Te Waka-a-Māui;
- Ngāti Toa Rangatira.

The site itself is not identified as a specific statutory area. It sits within the broader context of Te Taihū, where iwi interests are formally recognised and protected through Treaty settlement legislation. The eight Te Taihū iwi have Treaty settlements enacted through legislation, including:

- Ngāti Kōata, Ngāti Rārua, Ngāti Tama and Te Ātiawa o Te Waka-a-Māui Claims Settlement Act 2014;
- Ngāti Kuia Claims Settlement Act 2014;
- Rangitāne o Wairau Claims Settlement Act 2014;
- Ngāti Apa ki te Rā Tō Claims Settlement Act 2014;
- Ngāti Toa Rangatira Claims Settlement Act 2014.

Each of these Acts include Statutory Acknowledgments (SAs) and associated provisions that:

- Recognise iwi relationships with specified areas, including coastal marine area and named water bodies;
- Require consent authorities to have regard to these relationships in planning and decision-making processes; and
- Establish mechanisms for iwi to be informed and engaged where activities may affect these areas.

Across Te Taihū, Statutory Acknowledgments apply broadly to the coastal marine area, significant rivers, waterways and landscapes, and areas of cultural, historical and ecological importance. Additionally, the wider Stoke – Saxton – Waimeha Plains area is of cultural significance to multiple Te Taihū iwi and statutory acknowledgements apply to the surrounding environment (including waterways and coastal systems). Given that relevant statutory acknowledgements apply to surrounding receiving environments, these should be

addressed through iwi engagement/CIA in a substantive application. Although the site is inland, the settlement framework reinforces that:

- Iwi relationships to whenua and wai are not confined to mapped statutory areas;
- Planning and development processes must recognise the wider cultural landscape and catchment connections;
- Iwi have an established and recognised role in engagement, assessment and decision-making processes.

The applicant has acknowledged the cultural relationship of the eight iwi groups with a presence in the Te Taihū area and have contacted each iwi regarding engagement on the proposed development. This is outlined further in the consultation summary (**Attachment 7**) and the Iwi Engagement Outcomes Report (**Attachment 8**).

6.0 Statutory Framework

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.*
- c) If relevant, the New Zealand Coastal Policy Statement.*

These documents are assessed below. The New Zealand Coastal Policy Statement is not assessed because the site is not adjacent to the coastal environment.

6.1.1 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 ('NPS-FM') seeks to manage natural and physical resources to prioritise firstly, the health and well-being of water bodies and freshwater ecosystems, secondly, the health and needs of people, and thirdly the ability to provide for the social, economic, and cultural well-being of people and communities. The NPS-FM was amended in 2025 (with provision taking effect from January 2026) in relation to quarrying and mining activities.

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

- The proposal provides the opportunity for ecological restoration across the site which will improve the overall quality of freshwater environments (Policy 5).
- The proposal has taken into account the location of wetlands and waterways to design the development around these features (Policies 6, 7 and 9).
- Engagement with Iwi is on-going for this project (Policy 2).

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

6.1.2 National Policy Statement for Highly Productive Land 2022

The National Policy Statement for Highly Productive Land 2022 (NPS-HPL) ensures the availability of New Zealand's most favourable soils for food and fibre production, now and future generations. The NPS:HPL recently came into effect on 17 October 2022 and was amended in August 2024 and December 2025.

The NPS-HPL applies to land in the General Rural or Rural Production Zone, or the equivalent zone. The application site is located in the Rural Zone and is therefore subject to the NPS:HPL.

The New Zealand Land Resource Inventory ('NZLRI') maps have classified part of the site adjoining Saxton Field as LUC 3, comprising 24 hectares.

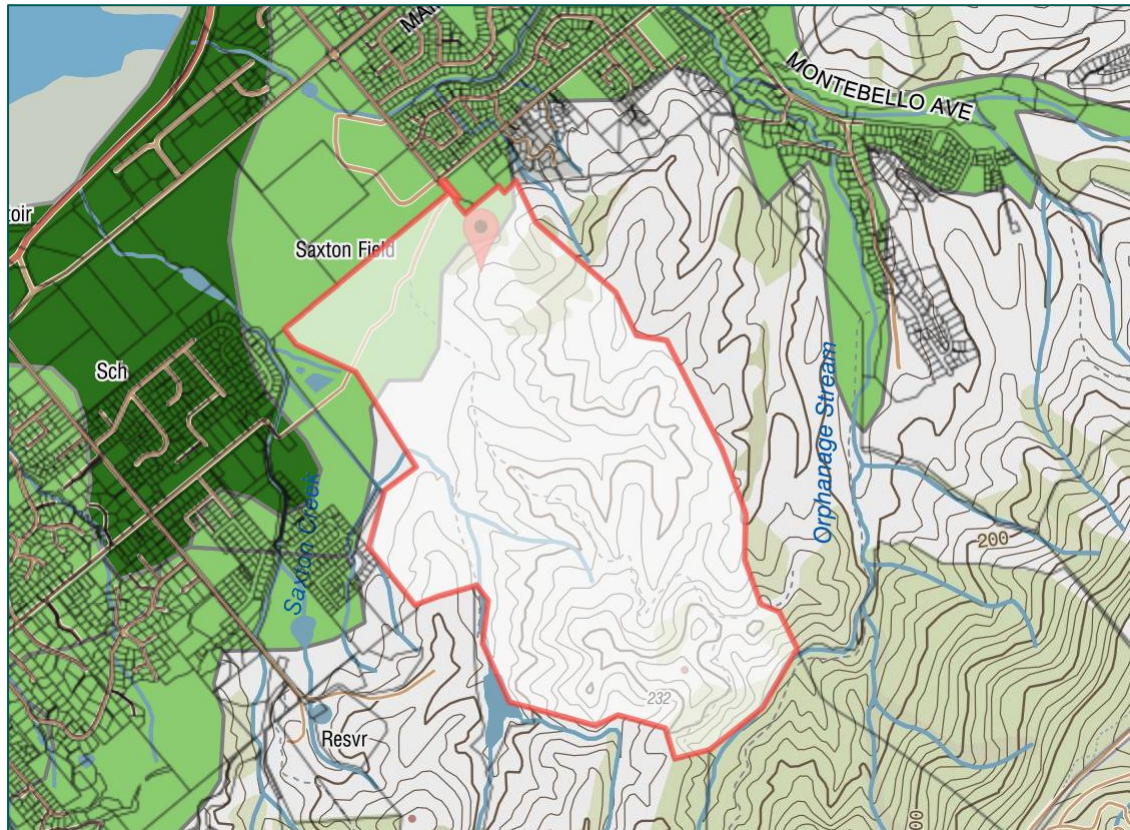


Figure 4: New Zealand Land Resource Inventory Map Source: Our Environment

The December 2025 amendments to the NPS:HPL removed protections for LUC 3 land, including under Clause 3.5(7) which states:

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.*

The proposal meets the criteria which exempts LUC 3 land from key protections under the NPS:HPL for the following reasons:

- The site does not contain any LUC 1 or 2 land under the NZLRI mapping, with 24 hectares of the wider site classified at LUC 3 and the remainder classed as LUC 6 and 7.
- The site is identified for future urban development under the Nelson Tasman Future Development Strategy.
- The current proposal seeks to obtain resource consent under the FTAA for the subdivision, use and development of the site for a new residential neighbourhood.

Based on the assessment above, it is considered that the project is consistent with the NPS:HPL.

6.1.3 National Policy Statement for Indigenous Biodiversity 2023

The National Policy Statement for Indigenous Biodiversity (NPS:IB) ensures the protection, maintenance and restoration of New Zealand's most threatened indigenous species. The NPS:IB came into effect on 4 August 2023.

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

- The site has been used as a farm and as such there is little in the way of trees or vegetation left.
- The proposal provides the opportunity to improve the site's terrestrial biodiversity through enhancement and protection activities, which will improve the overall diversity, native species habitat and quality of the site's terrestrial features (Policies 13 and 14).
- The proposed restoration, planting of riparian margins and wetland buffers will increase indigenous terrestrial ecological values by increasing ecological connectivity, indigenous plant species diversity and abundance, and habitat values (Policies 13 and 14).
- The benefits from ecological restoration on the site will provide a significant positive contribution in relation to indigenous biodiversity loss (Policies 13 and 14).
- Engagement with Iwi is ongoing for this project (Policy 2).

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

6.1.4 National Policy Statement for Urban Development 2020

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

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

The proposal is consistent with the NPS-UD for the following reasons:

- The proposal will establish a master planned community which enables a variety of homes including the option for a retirement village (Policies 1 and 2).
- The project will deliver an accelerated supply of dwellings to the market, which will be serviced by infrastructure and roading (including provision of active transport facilities) infrastructure. The dwellings are considered to support competitive land and development markets.
- The proposal will deliver a range of typologies and sizes which will contribute to the emergence of a diverse and vibrant community. This will also assist in responding to the changing needs of people, communities and future generations.
- The proposal will be coordinated with the delivery of private infrastructure (including roading and active transport facilities, stormwater, wastewater, water supply, electricity, gas and telecommunications) (Objective 6).
- The proposal provides a range of open spaces, all of which are within walking or cycling distance from proposed residential dwellings.
- The proposal will involve a change to the amenity and character of the area, with a higher intensity of development a change from vacant rural land. However, the proposal will offer significant amenity values through the provision of a carefully designed residential neighbourhood and commercial area. The final design will be informed with input from a landscape architect to minimise the effects on rural character (Objective 4).
- The proposal will likely contribute to an overall reduction in greenhouse gas emissions across the Nelson region by enabling Stoke to grow in a way that supports improved public transport, local employment opportunities, and other amenities within the development itself. The improved ecological areas will have a carbon sequestration function (Objective 8).

Based on the assessment above, it is considered that the project is consistent with the NPS:UD.

6.1.5 National Policy Statement for Natural Hazards 2025

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

There are no flood hazards that directly affect the site. The infrastructure report (provided as **Attachment 3**) notes that upgrades and naturalisation of existing open channels will ensure floodwaters can be conveyed through the site without adverse effects. In addition, finished floor levels will be set in accordance with Council guidance to maintain appropriate protection from any residual flood risk.

In terms of geotechnical hazards, a preliminary geotechnical statement of suitability for subdivision has been prepared by CMW Geosciences ('CMW') (attached as **Attachment 9**). This letter provides a high-level summary of the potential geotechnical hazards relevant to the site; confirming that the site will be geotechnically suitable for the proposed subdivision. A more detailed report which details ground models, investigation results and slope stability analysis will be provided for the existing and proposed topography in support of a substantive application.

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

6.1.6 National Environmental Standards for Air Quality 2004

The Resource Management (National Environmental Standards for Air Quality) Regulations 2004 (NES:AQ) sets standards to guarantee a minimum level of health protection for people living in New Zealand.

The potential for effects on air quality in relation to the Project relate primarily to dust during the construction phase. Measures will be proposed in the substantive application to manage potential effects in response to the air quality objectives and policies.

The management of dust and odour will be addressed in the Construction Management Plan and an Erosion and Sediment Control Plan as part of a substantive application. As such, ambient air quality will be maintained once constructed.

Based on the assessment above, it is considered that the project is consistent with the NES:AQ.

6.1.7 National Environmental Standards for Freshwater 2020

The Resource Management (National Environmental Standard for Freshwater) Regulations 2020 (NES:F) sets standards to regulate activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the proposal are the provisions which require resource consent for works in and around natural wetlands, and works affecting rivers and streams.

The masterplan is relatively high level to support the referral application with more detailed design occurring to support the substantive application if successfully referred. This more detailed work will confirm if work around wetlands triggers a prohibited activity status by way of Regulation 53. Regardless s21(7) of the Fast-track Approval Act enables the Minister to accept a referral application for an activity that is prohibited under the Resource Management Act 1991. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

Based on the assessment above, it is considered that the project is consistent with the NES:F.

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

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('NES:CS') sets a nationally consistent set of planning controls and soil contaminant values.

Given the historical rural uses of the site, it is likely that provisions of the NES:CS will apply to future residential development at the locations where HAIL activities are likely to have occurred. A detailed site investigation (DSI) involving a targeted soil sampling will be undertaken at the site in support of the substantive application. This will ascertain whether NES:CS and/or NRMP contaminated land resource consents are required to be sought in support of the development.

Based on the assessment above, it is considered that the project is consistent with the NES:CS.

6.1.9 Nelson Regional Policy Statement

Key relevant provisions of the Nelson Regional Policy Statement ('NRPS') are contained in Chapter 6 'Development and Hazards' and Chapter 7 'Natural and Amenity Values'.

Of particular relevance, Chapter 6 focuses on identifying and protecting areas with significant features or values, while considering community expectations for urban expansion. When urban expansion is preferred over intensification, the costs and benefits should be assessed based on the following criteria:

- Energy efficiency of location and design.
- Infrastructure and opportunity costs of existing services.
- Natural or physical barriers to expansion.
- Incompatibility with rural activities, such as quarries or odour-producing operations.
- Susceptibility to natural hazards.
- Proximity to sensitive areas like transport links, airports, or ports.
- Land use for primary production.
- Proximity to existing facilities.
- Impacts on riparian, coastal, and natural conservation values.
- Effects on significant natural features, vegetation, and habitats.
- Impact on ancestral lands, wāhi tapu, and taonga.
- Effects on heritage and amenity values.
- Impact on recreational resources.
- Influence on urban form and rural-urban boundaries.
- Availability of land resources for future generations.

Urban development proposals must ensure the adequate provision of essential services, including waste disposal, stormwater management, water supply, electricity, and other network services. The protection of property, as well as human health and safety, from the impacts of natural hazards is important and inappropriate development is to be avoided in hazard prone area. Efforts must be made to minimise any

potential adverse effects from hazard events and hazard-prone areas. Additionally, any adverse effects from hazard-related works must be avoided, remedied, or mitigated.

The key objective of Chapter 7 'Natural and Amenity Values' is to preserve or enhance amenity and conservation values and to have developments which are sympathetic to, or complements, significant landscape and natural features.

The technical reporting and subsequent master planning of the site demonstrates that the NRPS has been given effect to including the provision of necessary infrastructure to support the development; ensuring development is not located in areas prone to significant natural hazard risk; and providing a well-thought out development that is sympathetic to the landscape and natural features of the site, including by enhancing waterways through riparian planting and open space areas.

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

6.1.10 Nelson Tasman Future Development Strategy 2022 - 2052

The Nelson Tasman Future Development Strategy ('NTFDS') is a 30-year high-level strategic plan that outlines areas in the Nelson-Tasman region where there is potential for future housing and business growth. The strategy document was formally adopted at a joint council committee meeting on 29 August 2022. The purpose of the FDS is to promote long term strategic planning by setting out how the Councils intend to:

- Achieve well-functioning urban environments in their existing and future urban areas.
- Provide at least sufficient development capacity over the next 30 years to meet expected demand.
- Assist with the integration of planning decisions under the RMA with infrastructure planning and funding decisions.

The FDS for the Nelson-Tasman region is guided by 11 objectives which essentially seek to provide a strategy of consolidated growth, focused largely along State Highway 6 as the region is expected to grow significantly over the next 30 years.

The FDS identifies greenfield sites with potential for additional capacity at Saxton, at the eastern edge of the urban area. It outlines that investment in new three waters and transport infrastructure, including extension of bus services into the eastern valleys, will be required to support future growth in these areas. The strategy also notes that Stoke Centre will play an important role in the future to cater for these communities, and an increase in the diversity of services and community activities will be needed, together with improved walking and cycling connections to it.

The wider site at 467 Suffolk Road contains two future greenfield growth areas, referenced N-11 and N-115 within the FDS (Figure 1).

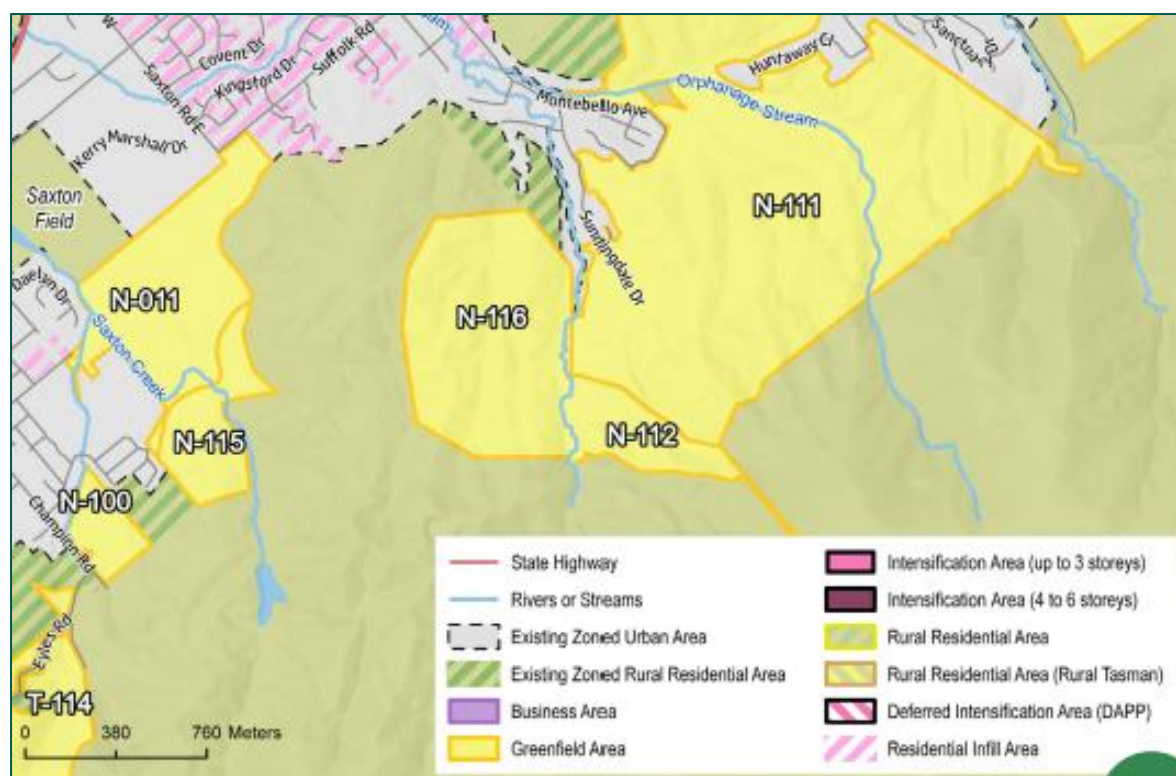


Figure 5: NTFDS N-11 and N-115 applicable to the site.

The technical reporting and subsequent master planning of the site demonstrates that the NTFDS has been given effect to by enabling development in areas identified for urbanisation. The development proposes a master planned community that will contribute to a well-functioning urban environment that contributes to the provision of sufficient development capacity to support anticipated housing demand.

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

7.0 Assessment of Effects

This section is provided in accordance with s13(4)(h) of the FTAA. This requires that applications include a description of the anticipated and known effects of the project on the environment.

The proposal will not generate significant adverse environmental effects, as any adverse effects on the environment will be appropriately avoided, remedied or mitigated to be minor or less than minor in nature. The key potential adverse effects are addressed in general below and should be reviewed in conjunction with the supporting technical expert memorandums accompanying this application.

7.1 Economics

An Economic Assessment of the proposal has been undertaken by Insight Economics (**Attachment 5**). This assessment finds that the proposal would generate the following one-time regional benefits:

- Approximately 1,630 full time equivalent ('FTE') years of employment.
- \$145 million in wages and salaries.
- Approximately \$292 million in GDP.

- Approximately 95 additional FTE's from the commercial component on an ongoing basis, alongside an additional \$6 million in annual wages and salaries and more than \$10 million in annual GDP.

In addition to these quantifiable regional contributions, Insight Economics has identified a range of (non-monetised) qualitative economic benefits for the wider regional market and communities, including:

- The development will result in a material increase in available housing supply in Nelson's constrained housing market.
- The development will contribute to improving the land market competition in Nelson and support a well-functioning urban environment.
- The opportunity cost associated with the foregone rural production is negligible when compared with the scale of the proposal's housing and economic benefits.
- The development will contribute to the enhancement of day-to-day life for residents, while establishing a foundation for sustainable, long-term growth of the region.

Considering the (non-monetised) economic benefits outlined above as a whole (including the quantitative economic injection into the regional economy and employment benefits), Insight Economics considers that advancing the proposed development would yield significant economic benefits for the regional economy and community. On this basis, Insight Economics is satisfied that the proposal meets the purpose of the FTAA and is supportable on economic grounds.

7.2 Transport

A Transport Assessment of the proposal has been undertaken by Abley Limited (**Attachment 2**). This assessment outlines the transportation context, anticipated effects and future assessment needs, and concludes that there are no transportation issues that would prevent the proposal from progressing to the Fast Track consenting stage.

The assessment highlights that the site is well connected for all transport modes, with opportunities for a well-integrated and resilient transport outcome through improved public transport coverage and new pedestrian and cycle connections within the site and into neighbouring areas.

On the basis of the above, it is considered that any adverse effects associated with transportation can be managed in that they will be less than minor.

7.3 Earthworks

Bulk earthworks across the site would be staged and would form topography suitable for building platforms, roading networks, stormwater management devices and overland flow paths, where required.

During construction, erosion and sediment control measures will be utilised to avoid an adverse environmental effect. All proposed sediment and erosion control measures will be designed in accordance with the Auckland Council's GD05.

Any adverse dust effects can be appropriately managed with standard conditions of consent.

On the basis of the above, it is considered that any adverse effects associated with earthworks can be managed in that they will be less than minor.

7.4 Infrastructure

Details of the proposed infrastructure services such as stormwater, wastewater, water supply and utilities are outlined above and further detail within the infrastructure report prepared by Inovo Limited (**Attachment 3**).

There is currently no public wastewater or water supply connection available at the site, however, the engineering report confirms that the site is able to be adequately serviced now, and in the future. Stormwater will be managed through a combination of road-based collection and reticulated systems directing flows to existing and new attenuation basins, prior to discharging into Saxton Creek or Orphanage Stream. Existing upgrades to the Saxton Creek stormwater facility enable part of the development, while additional basins will be constructed where required, all in accordance with the Nelson Tasman Land Development Manual. The on-site open channel will also be reshaped and naturalised to improve ecological outcomes.

Water supply will be provided primarily via the existing 200mm trunk main along the northern boundary, supported by a secondary connection to Saxton Road East for resilience. While the current network can service part of the development, a new reservoir is proposed to ensure sufficient pressure and capacity across the full site. Wastewater services will connect to the existing network within the Wakatu Pump Station catchment, which has confirmed capacity, with planned upgrades aligned to support future development. Power and telecommunications can also be readily provided, with confirmation of capacity for the proposed lots, undergrounding of existing lines, and provision for a new substation to support network resilience.

On the basis of the above, the site can be adequately serviced with infrastructure, and effects on the environment can be managed with appropriate infrastructure design.

7.5 Flooding

The site is not identified as being subject to coastal inundation or flooding within Nelson City Council mapping, and no Natural Hazard overlay applies under the NRMP. While the site receives flows from a wider upstream catchment, proposed stormwater management measures will direct flows through roads and swales to established discharge points. Upgrades and naturalisation of existing open channels will ensure floodwaters can be conveyed through the site without adverse effects. In addition, finished floor levels will be set in accordance with Council guidance to maintain appropriate protection from any residual flood risk.

On the basis of the above, the potential effects of the proposal on the environment in relation to flooding will be less than minor.

7.6 Ecology

An Ecological Assessment of the proposal has been undertaken by Viridis Limited (**Attachment 4**). This has already been discussed in some detail above. The use of the site for agricultural purposes has resulted in the site's main vegetation type being pasture. However, there are multiple locations where indigenous vegetation is present, largely surrounding the stream and wetland environments across the site that will be incorporated into the development where appropriate. The proposal involves opportunities for proposed reserves and open space areas, involving ecological restoration, enhancement and replanting. Some stream realignment and potential works within and at the margins of wetlands may be required and this will be addressed in more detail at the substantive application stage.

For the reasons set out above, any potential adverse ecological effects on the environment can be appropriately managed with mitigation measures in place.

7.7 Heritage Values

An Archaeology Assessment of the proposal has been undertaken by Amanda Young Archaeology (**Attachment 6**). This has already been discussed in some detail above. This assessment confirms that there is a risk of pre-1900 archaeological evidence being present within the development area that may be modified or damaged by the development works. To manage the risk of encountering archaeological evidence, an archaeological authority under s48 of the Heritage New Zealand Pouhere Act 2014 should be acquired prior to works commencing.

The archaeology assessment recommends that retention of any evidence of early historic farm buildings or structures. Consideration should also be given to retaining heritage trees within the development where possible. An appropriately qualified arborist will be involved in the preparation of a substantive application to consider the heritage and landscape trees, and the effects on the development on the trees and woodland.

For the reasons set out above, any potential adverse effects on heritage values will be less than minor.

7.8 Cultural Values

A summary of consultation undertaken with iwi on this proposal to date is included in **Attachment 8**. A hui was undertaken which identified a clear and consistent set of priorities, with a strong emphasis on:

- Protection and enhancement of water systems, including streams, stormwater and catchment effects;
- The need for robust baseline ecological and cultural information;
- Integration of cultural values into design and decision-making;
- Careful management of significant land-use change;
- Ongoing, structured engagement throughout the life of the project; and
- Provision of concise, accessible information to support participation.

The hui and engagement report identify a series of items requiring further work as the proposal progresses in its design, these matters relate to water management, baseline assessments, stormwater design, cultural risk management and the integration of cultural values into the project design.

A key outcome of the engagement with iwi to date is that a strong foundation has been established for progressing the project, with a pathway forward for ensuring engagement remains informed, collaborative, responsive and aligned. This provides the framework for addressing and integrating cultural values into the design of the development as part of a substantive application.

7.9 Positive Effects

The proposal will deliver a number of positive effects as already outlined. These are summarised as follows:

- Increasing housing supply in Nelson where there is currently a material shortfall in housing supply over the medium term which the project would help directly address.

- Delivery of a diverse mix of housing typologies to suit families of various sizes and different lifestyle choices to address housing needs including the potential for retirement living.
- Create a well-functioning urban environment that incorporates a new commercial centre to service the proposal.
- Enhancement of the natural environment through restoration planting and the design which seeks to weave natural space through the development.
- Generation of a wide range of economic benefits, such as providing a direct boost in housing supply to meet growing demand, meeting the needs of an evolving population, and contributing significant regional economic benefits.

7.10 Mitigation

This memorandum, and the supporting memorandums from the technical experts, identify a range of measures to address potential adverse effects and ensure that those adverse effects are avoided, remedied or mitigated. This includes the application of standard and well-established mitigation measures and more bespoke approaches to manage the particular effects of this proposal. These can be addressed through design, conditions of consent, and monitoring.

8.0 Conclusion

Having undertaken a high-level planning assessment, it is considered that there are no planning related reasons why the proposal could not proceed under the FTAA. Through strong design and technical input, the proposal can achieve a built form, environment and community that positively impact future residents and the wider Stoke community, while appropriately managing the potential adverse effects of development on the environment.

It is acknowledged that a full and comprehensive Assessment of Environmental Effects will be undertaken as part of any resource consent application, however at this stage, the potential adverse effects have been identified as less than minor and do not preclude the development from occurring.