

18 June 2025

Fast-Track Panel Convener
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Fast Track Approvals Act 2024 – FTAA-2504-1054

Christchurch City Council Reference - RMA/2025/1208

104 RYANS ROAD & 20 GRAYS ROAD, HAREWOOD

The purpose of this letter is to respond to Minute 1 of the Panel Convener, requesting views of participants on a range of matters to inform the decisions of the panel convener in relation to the appointment of panel members and the timing of the panel decision, as set out in Schedules 1 and 2 of the minute, under sections 52 and 79 of the Fast-track Approvals Act 2024 ('the Act').

These matters were discussed with representatives of the applicant and Canterbury Regional Council in a meeting on the 16th of June 2025.

Schedule 1 Matters

Range of decisions sought

A range of decisions are sought, as outlined in paragraph 67-68 of the Assessment of Environmental Effects. Of particular note to the Christchurch City Council as territorial authority are:

- Land use consent, to undertake development and earthworks, including landscaping, and to enable industrial use on the lots created in the subdivision, including buildings.
- Subdivision consent, to create 126 freehold allotments, and lots to vest as road and reserve, with the associated establishment and vesting of infrastructure.

For completeness it is noted that the following approvals are sought relating to the functions of other authorities, being:

- The Canterbury Regional Council:
 - o Water permit, to take water for construction purposes.
 - o Discharge consent, for the construction and operational phase discharge of stormwater.
 - o Land use consent to undertake earthworks over an aquifer and within riparian margins and install a culvert.
- The Department of Conservation:
 - o Wildlife Act Authority Permit, for the disturbance of native lizard habitat and the capture and relocation of any native lizards.
- Additionally, it is understood that a number of necessary permissions will be required prior to undertaking works, but have not been sought in this application, being:
 - o Written approval under RMA s176 from the requiring authority in relation to Designation D1 – Christchurch International Airport.

- Approval from the Selwyn District Council in relation to Selwyn District Council Water Race 5, located on the Ryans Road frontage.

Complexity

- Areas of legal complexity in relation to this application have not been identified, with the exception of novelty of the Act itself. Greenfield subdivision and associated development matters are well understood, and this application does not represent a particularly novel example.
- With regard to evidential and factual complexity, it is noted that a large number of reports with varying degrees of complexity have been provided with the application. This is typical of greenfield subdivision but is a large volume of information requiring technical comment, requiring time to consider and provide comment on.

Issues and disputed matters

- A number of issues of interest to the Christchurch City Council have been identified during pre-application engagement and during completeness checks. In particular:
 - Connections to, and capacity within, the water supply and wastewater networks, taking into account the 'out of sequence' nature of the development, which relies on existing capacity within CCC networks. This is likely to result in a shortfall in capacity for development in areas identified and provided for (by way of zoning) in the Christchurch District Plan.
 - The suitability of assets to vest, for example:
 - In terms of wastewater disposal, a local pressure sewer is proposed by the applicant, while conventional gravity sewer is preferred by the Christchurch City Council.
 - In relation to stormwater discharge to ground for basins proposed to vest in the Christchurch City Council, the level of assessment undertaken does not accord with the global regional consent for stormwater discharge held by the Christchurch City Council. Accordingly, the Christchurch City Council would not be in a position to accept this infrastructure to vest.
 - Effects relating to transport, for example:
 - The level and detail of assessment undertaken in relation to transport effects, in terms of safety in the immediate area and effects on the wider transport network.
 - The timing of, and responsibility for, upgrades to transport infrastructure by the Christchurch City Council and New Zealand Transport Agency.
 - The interface between the site and the surrounding rural area.
 - The means by which contributions for Council infrastructure can be secured, noting the Christchurch City Council Development Contributions Policy 2021 (under the Local Government Act 2002) will not be triggered, as the approval will not be granted by the Christchurch City Council. While the Policy provides for a development impact fee equal to the development contribution that would otherwise be required, it is our understanding that the applicant has elected not to pay this fee, with the effect of deferring the development contribution until such time that an approval is granted by the Christchurch City Council. This will not likely occur until building consent is applied for in relation to individual lots created.
- While a number of matters requiring care to manage have been identified, it is not considered at this stage that there are substantive matters in dispute.

Panel membership

- With regard to panel membership, it is considered that a panel comprising persons with legal and planning experience would be well placed to consider and make a decision on the application, supported by specialist

input provided by the applicant and local authorities. Notwithstanding, it is noted that the Act requires that an expert panel be appointed. In this case, highlighting the issues identified, relevant expertise may include infrastructure or transport.

- Provided the panel includes members able to engage with the above matters, assisted by specialist reporting as required, it is not considered that there is a need for the panel to include more than four panel members.
- The Christchurch City Council has engaged with the Canterbury Regional Council to consider persons with the appropriate knowledge and experience that could be jointly nominated by both authorities. Subject to any directions from the panel convener, it is likely that this nomination could be made promptly following the conference.

Tikanga

- The opportunity for iwi authorities and Treaty settlement entities to advise on matters relating to tikanga is acknowledged.

Procedural requirements

- The Christchurch City Council is willing to engage with and assist the panel, including attending briefings, meetings, or conferencing as required, either facilitated by the panel or by engaging directly with the applicant and other participants, for example to inform conditions.
- At this stage it is not considered that a hearing will be required.

Anything else

- The Christchurch City Council has not identified any other matters relevant to the appointment of the expert panel or the setting of timeframes for the panel decision.

Schedule 2 Matters

- The Christchurch City Council understands that the applicant is seeking a longer time period to respond to comments made under section 53, with a 25 working day timeframe for response, rather than the 5 working days provided for in the Act. The Christchurch City Council supports a longer time period for the applicant to consider and respond to matters raised in comments, or an alternative enabling these matters to be worked through prior to the panel decision.
- With the exception of the additional time sought by the applicant to respond to comments, the Christchurch City Council considers that the default time periods for decision making specified in the Act are appropriate.

Yours sincerely,



Francis White
Senior Planner

Reporting officer



Mark Stevenson
Head of Planning and Consents

Delegated authority