

Franco Farms Fast-track – Engagement and Consultation Record

Agency / group	Date	Form of engagement	Attendees	Summary	Actions
Canterbury Regional Council	26/11/2025	Email	Amanda Thompson (CRC), David Sluter (CRC), Kerstin Ghisel (B&A), Jesse Burgess (CRC), Victoria Watt (CRC), Ruth Evans (B&A)	Initial email correspondence regarding upcoming fast-track projects (Sabys/Candys Block). CRC Planning and Consents confirmed they work jointly on fast-track projects and requested a meeting to discuss both projects early.	
	3/12/2025	In person meeting	David Schulter (CRC), Victoria Watt (CRC), Anna Stuart (CRC) Todd Innes (DLS), Kerstin Ghisel (B&A), Ruth Evans (B&A)	Pre-app meeting. See B&A notes and pre-app minutes from CRC.	
	15/04/2026	Email		Email advising of notice of formal lodgement and 20 working day period	
	16/04/2026	Email	David Sluter (CRC), Kerstin Ghisel (B&A)	Email exchange confirming CRC is reviewing the referral notification and confirming the agenda for the 17/04/2026 pre-lodgement meeting. B&A provided updated scheme plan	
	17/04/2026	Teams Meeting	David Schulter (CRC), Anna Stuart (CRC), Dwayne Daly (CRC), Sam Prystupa (CRC), Jeremy Ecker (CRC), Kerstin Ghisel (B&A), Maisie Fisher (B&A)	Provided an update on where the project was at and intended lodgement date. CRC advised the more information available early through the substantive phase then the easier it is to work through the matters of contention. See B&A notes	Provided CRC with a copy of the draft rules assessment and will provide a copy of the draft referral application once it is finalised.
	14/05/2026	Letter	Jeremy Ecker (CRC)	CRC acknowledges FTAA s11 notification (15/04/2026) and confirms this response can be used as evidence of consultation. CRC provides preliminary, non-binding technical/planning guidance and encourages early sharing of draft assessments through the substantive stage to help resolve consenting issues before lodgement. Key points raised: - Consent framework: Applicant anticipates RMA s9/s13/s14/s15 consents and has provided a high-level CLWRP rule assessment (20/04/2026). CRC says there is insufficient project detail to confirm consent triggers and requests further detail, including why permitted thresholds can't be met. Notes NES-CS sits with CCC/SDC (site spans both). - Rule assessment clarifications requested (CLWRP): - Clarify why Rule 5.6 is triggered. - Confirm status of existing bores/wells and any active water-take consents;	The applicant will work with CRC through the substantive phase and provide draft reports and rules assessment prior to any formal lodgement. The majority of the questions raised within the letter relate to more detailed design of the project which will be addressed through the substantive stage.

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				permitted takes cannot be “stacked” (cumulative take must be assessed) (Rule 5.113 context). • If Rule 5.154 conditions aren’t met, CRC suggests assessment should go to Rule 5.155 (discretionary) rather than Rule 5.156 (non-complying); seeks clarification of interpretation. • Substantive lodgement expectations: comprehensive AEE across relevant matters, supported by technical reports and management plans; comprehensive policy assessment against CRPS/CLWRP + national direction; and a tailored draft condition set (CRC provided template conditions as a starting point). • Rivers/cross-project consistency: CRC flags a potential conflict with subdivision consent application CRC264261-3 (stormwater attenuation proposed south-west of Candys Rd appears to overlap with housing area shown in the fast-track scheme) and seeks clarification on how the proposals align. • Wetlands/ecology: potential for areas meeting NPS-FM/NES-FM and CLWRP wetland definitions; recommends use of MfE Wetland Delineation Protocols and early sharing of delineation/ecology material. • Groundwater/dewatering: groundwater likely very shallow (could be within ~0.5 m in wet conditions in lower areas); dewatering likely for excavations; infiltration/soakage designs need to account for high GW and artesian pressure/springs; expects dewatering/compliance assessment against Rules 5.119–5.120. Also notes potential risk to nearby domestic bores from contaminants discharged to ground. • Water quality: spring-fed streams/high GW/poor drainage suggest need for stronger assessment of water quality and ecological effects. • Soils (HPL): notes impact of urban development on versatile/highly	

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				productive soils (irreversible loss, soil profile degradation, offsite disposal) and wants to review HPL assessment and management approach.	
Selwyn District Council	9/12/2025	In person meeting	Ian Thompson, Brett Trumper, Richard Bigsby (SDC), Zani van der Westhuizen (SDC), Todd Innes (DLS) Kerstin Ghisel (B&A), Ruth Evans (B&A)	Pre-app discussions re. potential fast-track referral. See B&A notes.	
	12/3/2026	Emailed Richard Bigsy		Emailed to provide a timeframe for lodgement of the referral application and provided a copy of the latest scheme plan.	
	15/04/2026	Email		Email advising of notice of formal lodgement and 20 working day period	
	30/04/2026	Email	Geoff Deavoll (SDC), Kerstin Ghisel (B&A), Richard Bigsby (SDC), Ian Thompson (Applicant), Brent Trumper (Applicant)	Follow-up email exchange regarding pre-lodgement engagement. B&A provided the completed pre-app form as requested and offered a Teams meeting prior to the targeted referral lodgement date of 18 May 2026. SDC acknowledged receipt and advised they would come back regarding a possible further meeting.	
	5/05/2026	Teams Meeting	Geoff Deavoll (SDC)	Catch up meeting with Geoff to provide an update re the fast track project and confirm potential lodgement date.	
	11/05/2026	Letter	Geoff Deavoll (SDC)	SDC provided a section 11 notification response (Geoff Deavoll) noting comments are made without reviewing a draft referral/AEE and questioning the basis for "significant regional benefit" under the FTAA. SDC noted most of the development is within CCC, and raised key implementation/consenting matters for the Selwyn portion including: (1) the need for servicing agreements between SDC/Selwyn Water/CCC and the developer for potable water and wastewater (including DCs and vesting/easements); (2) uncertainty around stormwater reserve design/treatment and ongoing management costs/DC offsets; (3) the site is LUC 2/HPL under the interim NPS-HPL definition and subdivision is likely constrained with permanent loss of HPL a significant adverse effect to be accounted for in economic assessment; and (4) potential effects on Hohepa Homes Trust (Special Purpose Zone) with consultation recommended at substantive stage.	The key matters raised within SDC's letter has been addressed within the high-level technical reports prepared to support the referral application. Many of the questions raised within the letter relate to more detailed design of the project which will be addressed through the substantive stage. The applicant will continue to work with SDC through the substantive stage.

Agency / group	Date	Form of engagement	Attendees	Summary	Actions
Christchurch City Council	25/11/2025 03/12/2025	– Email	 Kirk Lightbody (CCC), Kerstin Ghisel (B&A), Ruth Evans (B&A)	Email correspondence arranging a pre-app meeting with CCC regarding the Candys/Sabys fast-track proposal and infrastructure matters. CCC advised limited availability prior to Christmas and confirmed the earliest time to meet with wastewater/transport/planning together was 16/12/2025 (9–10am), with stormwater staff (Brian Norton) unavailable until late January. Kerstin confirmed the 16/12/2025 meeting time and requested a further meeting with stormwater in January given stormwater will influence the layout.	
	16/12/2025	In person and Teams meeting	Kirk Lightbody (CCC - planning), Sarah Oliver (CCC - planning), Peter Rogers (CCC - transport), Chen (CCC – transport), Andy Milne (CCC – transport), Michelle (CCC – wastewater), Kevin McDonnell (CCC – stormwater) Todd Inness (DLS (via Teams)), Kerstin Ghisel (B&A)	Pre-app discussions re. potential fast-track referral. See B&A notes.	
	4/02/2026	In person meeting	Kirk Lightbody (CCC - planning), Brain Norton (CCC – Stormwater), Andy Hall (DLS), Kerstin Ghisel & Ruth Evans (B&A), Sean Ward (CCC)	Pre-app discussions fast-track application and stormwater disposal. See B&A notes	
	13/4/2026	Email	Email to Kirk and Sean to check in prior to finalising the referral application and whether they wanted to see any additional information prior to lodgement.		
	15/04/2026	Email		Email advising of notice of formal lodgement and 20 working day period	
	14/05/2026	Letter	Francis White & Paul Lowe	Received letter acknowledging Sabys 101's intent to lodge a fast-track referral for the Franco Farms (Candys/Sabys) residential development, but says the information provided is high-level and insufficient for detailed comment. CCC outlines key matters to address at referral stage, including clear national/regional benefits, why fast-track is needed, approvals/programme/staging, effects, and concept infrastructure servicing. CCC flags major constraints/risks around out-of-sequence greenfield development and significant servicing issues—particularly wastewater capacity and funding of required upgrades, plus water supply upgrades, stormwater discharge/ownership issues (stormwater facility in Selwyn, separate discharge consent, conveyance across Knights	Key matters raised by CCC within their letter are addressed within the high-level technical reports attached to the referral memo. The majority of the questions raised within the letter relate to more detailed design of the project which will be addressed through the substantive stage. The applicant will continue working with CCC through the preparation of the technical documents as part of the substantive stage.

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				Stream), transport capacity pressures, and design concerns (waterway oversight, narrow streets, park sizing).	
NZTA	17/12/2025	Email request for meeting re. fast-track referral application			
	19/1/2026	Email received from planner allocated to this fast track. Seeking copy of scheme plan and details of any proposed SH access.	Brynlea Stocks, Planner s 9(2)(a)		
	3/3/2026	Email sent to NZTA with copy of draft scheme plan and requested meeting			
	10/3/2026	High level transport assessment sent to NZTA			
	12/3/2026	Meeting request received from NZTA, meeting arranged for 23/3/2026			
	23/3/2026	Meeting held with Brynlea Stocks, James Long and Sagar Pandey (NZTA), Dave Smith (Abley), Ian Thompson and Brent Trumper (applicant), Kerstin Ghisel (B&A)		Would like to review a draft ITA prior to lodging a substantive application. Mentioned internal acoustic standards within the district plans in regards to residential units within the 100m setback from the state highway. See B&A notes	
	15/04/2026	Email		Email advising of notice of formal lodgement and 20 working day period	
	22/04/2026	Email	Brynlea Stocks (NZTA), Kerstin Ghisel (B&A)	NZTA requested a copy of the draft referral application for review, and asked whether the assessment of effects on the Candys Road/SH75 and Sabys Road/SH75 intersections had been completed. B&A advised the detailed intersection assessments will be undertaken at the substantive application stage and confirmed the applicant is willing to meet with NZTA once that work is completed. Advised that we are still working on finalising draft report and will email them a copy as soon as its completed.	Provide draft high level ITA
	6/05/2026	Email	Brynlea Stocks (NZTA)	Sent copy of final high-level transport assessment. Advised that an ITA will form part of the required reporting to inform the substantive application, and the applicant would be keen to meet with NZTA when they have a draft ITA.	
	12/05/2026	Email	From Brynley	NZTA acknowledges receipt of Sabys 101 Limited's notice of intent to lodge a referral application under the Fast-track Approvals Act for the Franco	Provide full draft ITA when completed and prior to lodgement of a substantive application and meet with NZTA to discuss the outcomes.

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				Farms development at Candys Road, Halswell. - NZTA has not yet reviewed the full referral application, but has reviewed a high-level traffic and transport assessment dated 30 April 2026 and supports its recommendation that a full Integrated Transport Assessment (ITA) be prepared at the next stage. - NZTA expects the ITA to assess effects on key intersections at State Highway 75 with Candys Road and Sparks Road, as well as impacts further east and north, given likely travel patterns to Christchurch city centre. - NZTA requests that, once lodged, a copy of the FTAA referral application be provided to them and that they be given the opportunity to comment on it.	
Mahaanui Kurataiao Limited	25/02/2026	Emailed details of proposal asking for feedback.	s 9(2)(a) MKL Website		
	3/3/2026	Received response asking if keen for pre-app advice.	Tayla Spence s 9(2)(a)		
	11/03/2026	Hui held with Tayla Spencer		See B&A notes	
	15/04/2026	Email		Email advising of notice of formal lodgement and 20 working day period	
	17/4/2026	Received preliminary mana whenua advice for this application site. There are two reports as this is a joint takiwā area.		Mahaanui Kurataiao Ltd provided preliminary mana whenua advice (Te Taumutu Rūnanga) for the proposed Fast Track referral for "Candys and Sabys Road" (Franco Farms Ltd). Advice is based on a hui held 11 March 2026 and a site plan provided; Mahaanui notes that full effects on tikanga/Mana Whenua values cannot be assessed until a formal application is available and further engagement will be required. Key matters raised include protection of the Hurutini (Halswell) River and tributaries (setbacks and riparian margins), flooding risk, earthworks and sediment control, stormwater treatment and preference for land-based/low-impact solutions, protection of wāhi tapu/wāhi taonga (Accidental Discovery Protocol), contaminated land/spill management, indigenous/taonga species planting, and fish passage/fish salvage where works affect waterways.	- Arrange kaitiaki site visit / ground-truthing of proposed waterway setbacks and margins (via Mahaanui). - Prepare and implement Accidental Discovery Protocol (ADP) for all earthworks. - Prepare Erosion and Sediment Control Plan (ESCP) in accordance with ECan guidance. - Commission a Cultural Impact Assessment (CIA) for substantive stage (requested due to flood risk; practitioner to be selected by Te Taumutu Rūnanga). - Confirm and respond to requested design expectations: minimum 10m setback from all waterways and no new impervious surfaces within 20m of the Hurutini (Halswell) River (to be tested/confirmed through design).

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					• Include stormwater treatment prior to discharge (first flush + heavy metals) and incorporate low impact urban design (rainwater/greywater reuse, minimise impervious areas, swales/rain gardens). • Undertake ecology surveys (taonga species incl. lizards/birds) and provide fish salvage / fish passage measures if any diversions/piping are required. This information will be collated as part of the documentation required to support a substantive application.
				Mahaanui Kurataiao Ltd (Te Taumutu Rūnanga) provided Preliminary Mana Whenua Advice for the proposed Fast-track referral (Candys and Sabys Road / Franco Farms). Advice was based on preliminary information discussed at hui (11 March 2026) and a site plan, and notes that full assessment of effects on tikanga/Mana Whenua values will require a formalised proposal/substantive application and ongoing engagement. Key matters raised include protection of the Hurutini (Halswell) River and tributaries (setbacks/riparian margins), flooding risk (CIA requested), earthworks and erosion/sediment control, stormwater treatment and preference for land-based/low-impact solutions, contaminated land/spill management, accidental discovery protocol for kōiwi/taonga/archaeological material, indigenous/taonga species planting, and fish salvage/fish passage where works affect waterways.	• Arrange kaitiaki site visit / ground-truthing of proposed waterway setbacks (via Mahaanui Kurataiao). • Prepare/implement Accidental Discovery Protocol (ADP) for all earthworks. • Prepare/implement an Erosion and Sediment Control Plan (ESCP) in accordance with ECan guidance. • Commission a Cultural Impact Assessment (CIA) for the substantive stage (requested due to flood risk; practitioner to be selected by Te Taumutu Rūnanga). • Confirm/reflect requested design expectations in the substantive package: minimum 10m setback from all waterways and no new impervious surfaces within 20m setback along the Hurutini (Halswell) River. • Ensure stormwater is treated prior to discharge (first flush + heavy metals) and incorporate low impact urban design (rain/greywater reuse, minimise impervious surfaces, swales/rain gardens). • Undertake ecology surveys (taonga species incl. lizards/birds) and provide fish salvage/fish passage measures where any diversion/piping of waterways is required. This information will be collated as part of the documentation required to support a substantive application.
	20/04/2026 23/04/2026	– Email	Tayla Spencer (MKT), Kerstin Ghisel (B&A)	Follow-up email exchange to clarify preliminary mana whenua advice. MKT confirmed “ground truthing” refers to a site	Arrange site visit (“ground truthing”) with MKT/Te Taumutu Rūnanga; scope CIA requirements and confirm CIA practitioner with

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				visit to review the actual on-the-ground size/space of the proposed waterway setbacks. MKT also clarified that a Cultural Impact Assessment (CIA) is not required prior to referral lodgement, but should be undertaken as part of the process. MKT advised that a CIA will likely require a draft AEE, ecological assessment, hydrological and flood risk assessment, stormwater assessment, and details of earthworks (including cut and fill) and depth to groundwater. MKT noted Te Taumutu Rūnanga has requested a specific CIA practitioner outside of MKT and may contact the applicant/B&A directly.	Te Taumutu Rūnanga; provide draft AEE and supporting technical assessments prior to lodgement of any substantive application.
	23/4/2026	Email		Received reply and further outline of ground truthing and CIA	
Whitiora Centre Limited	25/02/2026	Emailed details of proposal asking for feedback by 27/03/2026. Draft scheme plan sent 4 March 2026	Engagement Request Form		
	16/03/26	Hui held with Ruiha Johnson		See B&A notes	
	20/03/2026	Received summary of consultation from Ruiha Johnson		Requested information for substantive application: - Other matters of interest and concern to Ngāi Tūāhuriri Rūnanga also include: - The management of earthworks including: - Run-off from exposed earthworks into waterways causing contaminants to enter the waterway; - Dust nuisance; - Accidental discovery of Māori artefacts or sites of pre-European origin. - The availability and efficient use of water. - Reticulation of wastewater. - Stormwater management. - Protection of surface waterbodies and the habitat they provide for fish and invertebrates. - The use of indigenous and taonga species as part of landscape treatments.	This information will be collated as part of the documentation required to support a substantive application. The applicant will provide copies of draft reports prior to lodgement of a substantive application.

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				- Key things that we would like to see information on: - The proposed stormwater management system; - The proposed mechanism to protect waterway margins; - The presence of fish within the water race and any recommendations from an ecologist on the management of fish during construction; and - Confirmation on the presence of any springs within the site.	
	15/04/2026	Email		Email advising of notice of formal lodgement and 20 working day period	
Te Runanga o Ngai Tahu (TroNT)	25/02/2026	Emailed details of proposal asking for feedback by 27/03/2026	s 9(2)(a)		Whitiora advised: <i>There are no other rūnanga for this area and no Māori Land blocks in the general vicinity. Te Rūnanga o Ngāi Tahu will be listed on a section 17 report however engagement should be with specific rūnanga for projects such as this.</i>
	15/04/2026	Email		Email advising of notice of formal lodgement and 20 working day period	
Department of Conservation	22/01/2026	Initial email to fast-track enquiries	FastTrackApplicationEnquiries@doc.govt.nz		
	25/02/2026	Info provided to planner, meeting to arrange week of 3/3/26	Shawn Gardner, Consultant Planner Fast Track Applications s 9(2)(a)		
	3/3/2026	Pre-lodgement meeting completed		No red flags based on initial review. DOC will need to do s19 report on reserves that intersect the site. Expect consultation report from DOC in next few weeks. DOC recommend that this is included at lodgement stage. See B&A notes	B&A to talk to CCC and CRC re. Reserves
	5/3/2026	Ecological report sent to DOC			
	24/3/2026	pre-lodgement consultation summary obtained			The applicant will provide copies of draft reports prior to lodgement of a substantive application.
	15/04/2026	Email		Email advising of notice of formal lodgement and 20 working day period	
Heritage NZ	18/02/2026	Email		Email sent advising of the fast track proposal and welcoming the opportunity to discuss the	

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				project with Heritage New Zealand Pouhere Taonga at an early stage to confirm whether an Archaeological Authority is likely to be required under the Heritage New Zealand Pouhere Taonga Act 2014.	
	25/02/2026	Email		Draft scheme plan emailed.	
	2/3/2026	In person meeting	Nigel Bruer and Leah Harding	Recommended obtaining archaeological advice to determine whether an authority would be required.	An archaeological report is being undertaken and the applicant will meet with HNZN once the draft report has been obtained.
	15/04/2026	Email		Email advising of notice of formal lodgement and 20 working day period	
	5/05/2026	Email	From Fast-track Team Heritage New Zealand Pouhere Taonga	Received email response to notice of lodgement on 5 May 2026 which noted the following: - Based on a desktop review of the location, there appears to have been human activity prior to 1900 - We recommend consulting a suitably qualified archaeologist to confirm this and the potential for archaeological material to be present - If the works may modify or destroy an archaeological site, then an authority will be required prior to any works beginning - An authority can be applied for under the Heritage New Zealand Pouhere Taonga Act 2014, or as a part of a fast-track application The advice also contained a draft set of consent conditions.	
Ministry for the Environment	11/3/2026	Email		Email sent advising of the fast track proposal and requesting consultation.	
	11/3/2026	Email		Received email advising that following the Fast-track Approvals Amendment Act 2025 last December, MFE is no longer a relevant administering agency for the RMA. The requirements for pre-lodgement consultation with us under section 11 have been removed.	
	15/04/2026	Email		Email advising of notice of formal lodgement and 20 working day period	

Canterbury Regional Council

B&A

Urban & Environmental

Response to Notification for Franco Farms Development, Sabys 101 Limited – RMA262792

Disclaimer: *This response provides preliminary technical council guidance on potential matters that may affect applications under the Fast-track Approvals Act 2024. It does not constitute legal advice and should not be relied upon as such. The advice reflects an initial review of material within limited timeframes and is not a full or definitive assessment.*

Kia ora Kerstin,

Thank you for providing Canterbury Regional Council (CRC) notice under section 11(1)(b)(i) of the Fast-track Approvals Act (FTAA) on 15/04/2026. Section 11(1)(c) states that CRC have 20 working days to respond to this notice. Please accept this as CRC's response to that notification.

CRC understands that Sabys 101 Limited (the Applicant) will need to provide evidence of consultation as part of its application under sections 13(4)(k) and (ka) of the FTAA. CRC is happy for this response to be used for that purpose.

In addition to the formal notification above, we note that CRC were also provided the opportunity to review a draft rule assessment for the project. CRC's feedback on this information is captured below. CRC's comments are intended to assist the Applicant in identifying relevant regional council matters early, so that these can be worked through as efficiently as possible before lodgement of the substantive application.

CRC appreciates the opportunity to provide early feedback at this stage of the Fast-track process. CRC's role is not to make a decision on the proposal, but to provide preliminary technical and planning feedback on matters that may be relevant to the substantive application. CRC is keen to continue engaging constructively with Sabys 101 Limited and Barker & Associates Limited. To this end, CRC encourages the early sharing of draft assessments or technical material where this would assist in identifying and resolving consenting matters before lodgement of a substantive application with the EPA.

Project Summary

The application is to develop the land located at Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573 and 6 Wroots Road. The Project will establish:

- Approximately 348 residential lots and associated residential units.
- A neighbourhood centre (approximately 2,115m²) to provide for the future resident's day to day needs located adjacent to Sabys Road.
- A new reserve and enhanced riparian margin adjacent to Knights Stream, the Halswell River and the Creamery Drain.

- The proposal incorporates an integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve (approximately 2,236m²) and stormwater basins with associated wetland areas (approximately 5.6ha) to the south of the application site.
- Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure.

Feedback

Based on the information provided by the Applicant, CRC staff have raised the following comments regarding this proposal. These comments are set out below.

Planning - Consent Requirements

The Applicant has provided an assessment of consent requirements under the Canterbury Land and Water Regional Plan (CLWRP) in a memorandum dated 20 April 2026 (memo). The memo followed on from initial information provided in an email dated 15/05/2026 which included an assessment of consent requirements under the Resource Management Act 1991 (RMA). Based on that assessment, the Applicant envisages seeking consent for the following activities:

- a) Land use consent under section 9 of the Resource Management Act 1991 (RMA).
- b) Works in the bed of a lake or river consents under section 13 of the RMA.
- c) Take and use consents under section 14 of the RMA.
- d) Discharge consents under section 15 of the RMA.

The Applicant's memo includes an assessment of consent requirements under the CLWRP. The memo also notes the potential for consents to be needed under The National Environmental Standards for Freshwater Management 2020 (NES-FM) and that consent is required under the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS).

CRC notes that the memo provides a helpful high-level overview of potential consent requirements. At this stage, however, the level of project-specific detail provided means CRC is not yet able to confirm the consent requirements for the proposal. CRC would welcome further details on the proposed activities and the reasons why any permitted activity thresholds may not be met. This would assist CRC in providing more specific feedback on consent requirements under the CLWRP and NES-FM. Further CRC notes that consenting matters relating to the NES-CS, fall to the district or city council, in this case both Christchurch City Council (CCC) and Selwyn District Council (SDC) are relevant as the site is across both boundaries.

CRC also notes that the Applicant is intending to seek any relevant resource consents from the Selwyn District Council / Christchurch City Council under their district plans if the relevant consent triggers are met, in addition to any consents under applicable National Environmental Standards. It is CRC's understanding that the Applicant will also seek wildlife approval from the

Department of Conservation (DOC) under the Wildlife Act 1953, and approvals from Heritage New Zealand Pouhere Taonga under the Heritage New Zealand Pouhere Taonga Act 2014.

To assist the Applicant in refining the rule assessment, CRC has identified the following matters:

- i. CRC understands that Rule 5.6 generally applies where an activity is not otherwise classified by the CLWRP as one of the activity classes listed in section 87A of the RMA. It would therefore be helpful if the Applicant could clarify how this rule is considered to be triggered by the proposal.
- ii. Regarding Rule 5.113, the memo indicates water may be taken from existing bores / wells on site. However, the memo does not make clear whether the bores are subject to an active take and use consent. CRC recommends that further information is provided on the consent status of these bores/wells. CRC notes that permitted water takes cannot be “stacked”, i.e., the cumulative water take from all bores on the site must be assessed in order to determine whether permitted activity thresholds are complied with or if resource consent is required.
- iii. The memo states that if the proposal cannot comply with the conditions associated with permitted activity Rule 5.154, then it will be classified as a Non-Complying Activity under Rule 5.156. However, where an activity cannot meet the conditions of Rule 5.154, it should be considered under Rule 5.155 as a discretionary activity, rather than under Rule 5.156 as a non-complying activity. CRC would appreciate further clarification on the Applicant’s interpretation of Rule 5.156 and why the activity is considered to fall under that rule.

A substantive application would need to include a comprehensive assessment of effects in across all relevant consenting matters, supported by appropriate technical assessments and draft management plans where necessary.

CRC would welcome the opportunity to review any updated rule assessment alongside a draft assessment of effects and associated technical reports and / or management plans in advance of a substantive application being lodged. Early provision of these documents would allow CRC to provide timely and constructive feedback before the substantive application is formally lodged.

Policy Framework

The substantive application would also need to include a comprehensive policy assessment against the relevant policy framework within the Canterbury Regional Policy Statement (CRPS) and CLWRP, alongside any relevant national direction.

CRC would also welcome the opportunity to review any draft policy assessment in advance of a substantive application being lodged. Early provision of this assessment would allow CRC to provide timely and constructive feedback before the substantive application is formally lodged.

Conditions

A substantive application would also need to include a comprehensive set of proposed conditions. To assist with this, CRC have attached to this letter a set of standard templated conditions relevant to the consents potentially being sought.

Please note that these template conditions are provided as a general guide. Not all conditions will be relevant to the proposed activity. For those that are relevant to the activities sought in this application, CRC note that site-specific considerations may necessitate addition, removal, and / or amendment of conditions. CRC hopes the attached template conditions will assist in preparing a condition set that is appropriate for the specific proposal.

The template conditions are intended to provide a helpful starting point for the Applicant. CRC encourages the Applicant to tailor the proposed conditions to the specific project and clearly demonstrate how potential adverse environmental effects will be avoided, remedied, or mitigated.

CRC would also welcome the opportunity to review the draft condition framework as the application develops, noting that any final conditions would ultimately be considered by the expert panel as part of the Fast-track process.

Rivers

Subdivision consent application (CRC264261-3 currently in process with CRC) lodged by Franco Farms Ltd for land on the north-east side of Candys Road proposes what appears to be permanent stormwater attenuation (first flush basin, wetland, storage pond) for the subdivision on land to the south-west of Candys Road.

This appears to conflict with the proposed Fast-track development, which proposes housing in the location of the proposed stormwater attenuation. Therefore, CRC would appreciate clarification on how the subdivision consent application and the proposed Fast-track development relate to one another and which aspects of the Fast-track proposal are intended to be progressed.



Land Ecology

CRC notes that there may be wetland habitats associated with rivers, streams, other waterways, and their riparian margins within or adjoining the project site. Further, that these areas may meet the definition of a 'natural inland wetland' under the NPS-FM / NES-FM, as well as the CLWRP definition of 'wetland'. CRC therefore encourages the Applicant to consider these areas further before the referral application is lodged, to help ensure any relevant wetland matters are clearly identified early in the process.

If there is any doubt over the nature and extent of a wetland, CRC recommends the Ministry for the Environment's Wetland Delineation Protocols should be used to delineate any potential wetland.

CRC would welcome the opportunity to review any draft wetland delineation or ecological assessment material, if available, to help ensure any relevant NES-FM and CLWRP matters are identified before lodgement of a substantive application.

Groundwater

While the information available to-date is limited, CRC understands that there may be the need to excavate and dewater, and presumably there will be stormwater infrastructure.

For CRC264261-3 (to the east of the Fast-track site) the groundwater levels were assessed as 1.5-2.8 m below ground level. For the Fast-track site, ground elevations are lower, especially in the area just southwest of Candys Road. CRC estimate, based on elevation data and piezometric contours in our database, that groundwater levels in this area will get within 0.5m below ground level under wet conditions.

This indicates that dewatering during excavations is likely required (depending on the depths and timing), and any underground infrastructure will likely be exposed to groundwater. Also, any infiltration / soakage basins as part of the proposal should be designed with high groundwater levels in mind. In addition, the presence of springs along the Halswell River indicates that groundwater below the site is under pressure. CRC notes that this creates a risk for excavations (integrity of confining layers) and potential concern for the suitability of infiltration basins. For these reasons, CRC anticipate a dewatering assessment and / or compliance assessment against the applicable CLWRP dewatering rules, including Rules 5.119–5.120, as part of a substantive application.

CRC also notes that there are domestic bores in the surrounding area. It would therefore be important for the substantive application to consider whether any stormwater or contaminants discharged to ground could affect water quality in those bores.

CRC would welcome the opportunity to review any technical reports or other material, if available, to help ensure any relevant groundwater matters are identified before lodgement of a substantive application.

Water Quality

CRC understands that the site contains spring-fed streams with high ecological values, springs, high groundwater, and poor drainage. CRC therefore considers there would be value in providing further assessment of these matters to provide greater clarity on potential water quality and ecological effects.

CRC would welcome the opportunity to review any technical reports or other material, if available, to help ensure any relevant water quality matters are identified before lodgement of a substantive application.

Soils

CRC note the issues associated with urban development on highly productive soil would be applicable to the site, these include:

- Irreversible loss of versatile soils to urban development;
- Degradation of the soil profile, impacting how soils can support vegetation and stormwater attenuation in urban environments. Across the green space areas, site earthworks will replace the existing deep and functional soils with very shallow topsoil over whatever surface has been formed to design levels by cut & fill works; and
- Disposal (and loss) of soil offsite.

CRC would welcome the opportunity to review any assessment of highly productive soils and how any associated effects are proposed to be managed.

CRC look forward to continuing to engage collaboratively with Sabys 101 Limited and Barker & Associates Limited on this Fast-track project. CRC is keen to assist where it can by providing early feedback, noting that CRC is not the decision-maker for the substantive application but rather plays a role of a relevant local authority providing input to assist the applicant, the EPA, and the expert panel. CRC is therefore keen to engage early and constructively to help ensure relevant matters are identified and addressed as efficiently as possible and to support a more efficient consenting process.

Nga mihi nui,



Dwayne Daly
Principal Planner
14/05/2026



‘What Does Good Look Like’ under the Fast-track Approvals Act 2024

Canterbury Regional Council’s
Guidance for Fast-track Consent
Applicants

Guidance for Fast-track Applications that Require Resource Consent from Canterbury Regional Council

Note: This document is intended to provide general guidance only from the Canterbury Regional Council (CRC) to assist applicants. It is not legal advice and should not be relied upon as a substitute for independent professional advice nor should this be relied upon as advice from the Environmental Protection Agency (EPA). Responsibility for the completeness and accuracy of an application rests with the applicant.

Executive summary

This guidance clarifies considerations about what constitutes excellent, good, or adequate Fast-track applications. Submitting quality applications to the EPA with all the necessary information enables CRC (and other parties) to make recommendations to the EPA on the lodged applications in an efficient and timely manner, and avoids the potential for an application to be deemed incomplete.

Due to the wide and varied nature of what can be entailed within applications, this document serves only as a general guidance note and starting point. Each application must be considered on its merits based on the activity, its scale and significance as well as the level of mitigation and offsets, in line with the purpose of the Fast-track Approvals Act 2024 (FTAA).

Drawing on our first-hand experience, we have identified the level of information required to support efficient, constructive feedback, and have developed this guidance document accordingly.

Introduction

This guidance is intended to clarify expectations for Fast-track applications, improve application quality, and support efficient and robust recommendations by CRC. It reflects a different approach to collaboration between all parties involved in the processing of a Fast-track application, than that typically seen under the Resource Management Act 1991 (RMA).

Every application for a Fast-track resource consent must be prepared in accordance with Section 13 and Schedule 5 of the FTAA for a referral application, and Section 43 and Schedule 5 of the FTAA for a substantive application. While some parts of those requirements are relatively unambiguous (like the need to identify the full name and address of each owner and occupier of the site/potentially affected parties), other aspects are more subjective (for example, what is needed for an assessment of environmental effects).

Resource management practitioners across Canterbury Waitaha and wider New Zealand Aotearoa have been asking us for guidance on our expectations around Fast-track applications. It is difficult to provide one-size-fits-all guidance on what an excellent Fast-track application looks like, as there is no pre-determination of the application's outcome, nor a one-size-fits-all approach.

The FTAA gives regional councils opportunities to provide advice on applications both to the EPA and to the Panel determining an application. This advice ranges from completeness checks of an application and recommendations on timeframes to be set for Panels to determine a proposal, through to adequacy of conditions, compliance with legislative documents and potential environmental effects.

The information provided in an application can significantly shape the feedback we provide to the EPA or the Panel throughout the Fast-track process. With this in mind, we have considered through first-hand experiences what level of information would enable us to make recommendations in an efficient manner within the constrained timeframes.

Under the Fast-track Approvals Amendments Act 2025 (FTAAA), applicants only need to notify local relevant parties and give them 20 working days to respond. However, a more comprehensive and collaborative approach between the applicant and CRC results in a smoother path to the decision of the application.

Through experience with a wide range of Fast-track applications, we have seen that early engagement, sharing working drafts, and adopting a collaborative approach leads to pragmatic and efficient decision making. Conversely, limited consultation and reliance on traditional RMA processes often results in poorer outcomes. The FTAA operates under a fundamentally different purpose, tests and framework, with a focus on regional and/or national benefits, and applicants are encouraged to approach it accordingly.

Three levels of standards of applications are described below. We expect that applicants strive towards 'excellent' as we believe this leads to much better outcomes for the applicant and the environment. While the details below describe expectations for an application, applicants should apply many of the 'pre-lodgement' principles to their entire Fast-track process. Continued collaboration ensures all parties can maximise outcomes in tight timeframes.

We recognise that application quality may vary across different components depending on circumstances such as timeframes or expert availability. Some aspects may meet an excellent standard while others are good or adequate. The overall objective is for all components to meet excellent or good expectations, as appropriate to the scale, significance, and matters of discretion or control.

To be clear, the points included below are what CRC believe is required to be an adequate, good or excellent application, which may be different to what the EPA assess during their completeness check and what is listed in the FTAA.

Excellent application

An excellent application provides all information necessary for CRC to make a completeness recommendation. While it is acknowledged that not all matters will be agreed upon (hence the application is being considered under the FTAA), the application identifies clearly those matters which have been resolved through consultation with key parties, with only key matters of difference remaining for the Panel to determine. Both CRC and the applicant understand the respective reasons for their opinions.

Communication with the applicant and information flow throughout the process from pre-application to lodgement and beyond is at a high level, with the applicant willing to proactively work with us to address any issues identified through pre-application and substantive reviews.

This typically occurs when technical assessments have been reviewed and refined through early engagement with relevant experts, including Papatipu Rūnanga Environmental Entities (PREE referred to as *Relevant Iwi Authority in other parts of New Zealand*) where possible.

Good application

A good application provides the information necessary for CRC to recommend whether the application meets the completeness decision threshold, with only a few information requests, clarification, or limited expert conferencing required to verify or refine what has been provided.

Communication with the applicant is at a high level between the applicant and our staff at key stages to adequately address issues once a substantive application is lodged.

A good application demonstrates some pre-application engagement and an approach that works through issues early, documents these discussions and ultimately shapes the proposal toward a successful outcome.

Adequate application

An adequate application is one that meets the minimum statutory requirements and provides enough information for CRC to provide a completeness recommendation. There is very little/minimal pre application engagement but the applicant confirms they will provide the draft application to CRC when notifying a substantive application. While there may be still be issues to resolve and clarification required, the applicant demonstrates they are willing to engage with us to work through these.

As noted above, CRC provides advice to the Panel Convenor regarding appropriate timeframes for a Panel to decide a proposal. Where little to no consultation has been undertaken and/or we have significant concerns relating to the assessments of effects, this will likely be reflected in those timeframes recommendations. We will recommend additional time to allow the Panel time to, for example, seek independent advice or hold a hearing if necessary. It is expected the overall costs and timeframes associated with adequate applications will exceed those for excellent applications.

Table 1. CRC expectations for applications lodged under Fast-track Approval Act.

This table is to be read in combination with *Guidance for Fast-track Applications* above, which provides general information on what should be provided for all Fast-track applications. This table provides more specific guidance on the level of information required for applications to allow efficient consultation and engagement with CRC during processing of a Fast-track application. Better information may not necessarily result in a recommendation to the Panel to grant the application, but it should enable a decision to be reached more quickly, efficiently and provide a stronger foundation for a more successful outcome.

Excellent	Good	Adequate
Description of activity ¹		
The activity is clearly described such that someone new to the proposal could understand the proposal without visiting the site. Use of plans and photographs to provide context for the proposed activity, and support statements made in assessment/description. Identification of the following included: a. a statutory area (as defined in the relevant Treaty settlement Act); or b. ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or c. a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011 Plans shared with CRC through pre-application phase and feedback on plans and description of activity incorporated into the application.	Proposal is well described, with identification of the following: a. a statutory area (as defined in the relevant Treaty settlement Act); or b. ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or c. a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011 Basic plans used to show subject areas.	Proposal is described with limited supporting documents (plans, photographs).

¹ Schedule 5, clause 5(1)(a) and clause 5(1)(c)

Excellent	Good	Adequate
The application clearly details how the proposal is consistent with the purpose of the FTAA². This assessment supported by legal and technical advice where required. For staged projects under s21(1)(a), explain how both the stage to which the application relates and the whole project are consistent with the purpose of the FTAA. Detailed information relating to the likelihood that any later stages of the project will be completed.	Assessment against purpose of FTAA and description of staging of project where applicable.	Assessment showing how proposal is consistent with purpose of FTAA, limited information on staging provided for such activities.
Further to the purpose of the FTAA, clearly set out all relevant matters described in s43 . <i>Note this particular provision has been included for completeness however generally applies to EPA more than CRC.</i>	Matters described in s43 addressed	Matters described in s43 addressed
Clearly set out confirmation that the application complies with section 46(2)(a), (b) and (d) including description as to how compliance reached. <i>Note this particular provision has been included for completeness however generally applies to EPA more than CRC.</i>	Confirmation application complies with section 46(2)(a), (b) and (d) included but need to look to find this within the assessment	Application states proposal complies with section 46(2)(a), (b) and (d)
The full name and address of owner and occupiers³ with associated maps⁴ showing location of land parcels which are set out clearly to show areas associated with different parts of the proposal.	The full name and address of owner and occupiers listed with some supporting description.	List of full name and address of owner and occupiers.

²s 43(1)(b)

³ Schedule 5, clause 5(1)(d)(i) and clause 5(1)(d)(ii)

⁴ Schedule 5, clause 5(1)(b)

Excellent	Good	Adequate
Other activities⁵, authorisations⁶, consents for same activity⁷		
Overall proposal described including activities not requiring authorisation. Reasons authorisations are/are not required are clearly worked through. Permitted activities⁸ identified including demonstration of compliance with conditions of permitted activity rules in relevant documents. All consenting authorities and requirements identified. Clearly showing how they are all interrelated in terms of scope. Applicant will have had pre-application discussions with CRC and any other relevant party to ensure all necessary approvals are being sought for the proposal. Inclusion of s30 letter from CRC including acknowledging if any further information has arisen since that letter was prepared.	An assessment on other activities associated with proposed works provided, however the information provided to reach the conclusion is lacking supporting information. All consenting authorities and requirements identified. Inclusion of s30 letter from CRC.	Some indication that the proposal requires other approvals/consents.
Purpose and principles of the RMA⁹		
Comprehensive RMA assessment provided that clearly shows how this proposal would fit under the RMA.	Part 2 assessment and detailed level of assessment as to how the proposal would be facilitated under the RMA.	Some level of assessment as to how the proposal would be facilitated under the RMA.

⁵ Schedule 5, clause 5(1)(e)

⁶ Schedule 5, clause 5(1)(f)

⁷ Schedule 5, clause 5(1)(l)

⁸ Schedule 5, clause 5(5)(a)

⁹ Schedule 5, clause 5(1)(g)

Excellent	Good	Adequate
Assessment of relevant legislation¹⁰		
Comprehensive consideration of all relevant planning and policy documents, including rule assessments where applicable. Detailed rule assessment with a full breakdown of the consents required has been provided. Where approval is being sought for activities considered to be prohibited under relevant plans, analysis of key objectives and policies required. Where proposals relate to significant infrastructure, identification of policies relating to national or regional significance in these documents is discussed. Correct plans and all policies CRC considers relevant are identified, and detailed policy assessment has been provided. Assessment of all relevant Iwi Management Plans.	Correct plan has been identified and most of the policies and rules CRC considers relevant are identified. Sufficient assessment of policies has been provided. Some assessment of rules has been provided.	The correct plan has been identified however not all policies or rules CRC considers relevant are captured.
Cultural considerations		
Treaty settlements and customary rights¹¹		
Application identifies, maps and describes any relevant provisions of Treaty Settlements, customary marine title groups, protected customary rights or Marine and Coastal Area (Takutai Moana) Act 2011.	Application identifies and describes any relevant provisions of Treaty Settlements, customary marine title groups, protected customary rights or Marine and Coastal Area (Takutai Moana) Act 2011.	Application identifies relevant provisions of Treaty Settlements, customary marine title groups, protected customary rights or Marine and Coastal Area (Takutai Moana) Act 2011.

¹⁰ Schedule 5, clause 5(1)(h)

¹¹ Schedule 5, clause 5(1)(b), clause 5(1)(c), clause 5(1)(i) and clause 5(1)(j)

Excellent	Good	Adequate
Application is supported by comments provided through consultation with relevant iwi authorities.		
Effects on tangata whenua values		
Evidence of pre-lodgement consultation beyond notification with the appropriate iwi representatives and Rūnanga view is clearly stated in the application.	Some evidence of pre-lodgement consultation with Rūnanga, beyond just notification. Rūnanga view is not clearly stated.	Limited or unsupported conclusions regarding effects on tangata whenua values. Rūnanga have only been notified by the applicant.
In addition to detailed assessment of relevant iwi management plan, good assessment of how mitigation/offsets/compensation will cover the differences of where the proposal and Rūnanga aspirations differ. Includes conditions that have been agreed on with Rūnanga. The application must include views of iwi or hapu that have been consulted with in relation to the proposal¹². Where there are protected customary rights, assessment of effects on the exercise of these rights should be prepared¹³ in conjunction with appropriate parties.	Tangata Whenua values are identified in the relevant iwi management plan, however no assessment as to how mitigation/offset/compensation is detailed.	Limited assessment against iwi management plans.

¹² Schedule 5, clause 6(1)(e) and clause 6(1)(f)

¹³ Schedule 5, clause 6(1)(h)

Excellent	Good	Adequate
Proposed conditions ¹⁴		
Application proposes locality specific mitigation to avoid, remedy, mitigate, offset or compensate for adverse effects. Where scale and significance of the activity's effects are such that monitoring is required, conditions describing how the effects will be monitored and by whom¹⁵. Mitigation measures include safeguards and contingency plans where relevant. Application and supporting technical assessments clearly identify where mitigation, offsetting, compensation or monitoring are required with cross referencing to condition numbers. Comprehensive set of conditions supplied for each aspect of the application. These conditions have been worked through during pre-lodgement with CRC technical teams to ensure they are enforceable and capture the intent of mitigation. The conditions are set out separately for each consent being sought and utilise CRC condition sets where appropriate (condition templates are available on request). Application clearly identifies <i>Augier</i> (proffered) conditions and scope for the Panel to impose conditions.	Clearly proposes 'standard' mitigation to avoid, remedy, mitigate or compensate adverse effects which may not correspond to the scale and significance of what is proposed. Provide a set of proposed conditions upon lodgement of the substantive application in accordance Schedule 5, (5)(1)(k) of the FTTA. It is likely these conditions will require further refinement due to limited consultation. The conditions are set out separately for each consent being sought (condition templates are available on request). Limited consultation/agreement on conditions with CRC through pre-application process.	Application assumes/implies adoption of 'standard' mitigation. With poor or no conditions supplied within the application. Provide a set of proposed conditions upon lodgement of the substantive application in accordance Schedule 5, (5)(1)(k) of the FTTA. It is likely these conditions will require a substantial amount of refinement due to limited consultation.

¹⁴ Schedule 5, clause 5(1)(k)

¹⁵ Schedule 5, clause 6(1)(g)

Excellent	Good	Adequate
Assessment of Environmental Effects ¹⁶		
Existing environment		
Description of the environment based on site visit and technical investigations at the site, or otherwise relevant, to specific site of activity. Use of plans and photographs to provide context for the proposed activity, and support statements made in assessment/description. Information gathered and presented is consistent with published guidelines/requirements (e.g. natural inland wetlands delineated, using Ministry for the Environment's Wetland delineation protocols). Clear identification of 'existing environment' as potentially modified by permitted activities and consented activities that are likely to be exercised. Technical understanding of investigations and assessments pre-agreed with CRC staff and/or independently peer reviewed. Where applications are for the re consenting of an existing activity, or unconsented activities may have been undertaken on a site; discussions held with CRC Planning and Legal representation to establish agreement on existing environment, or an understanding of where differences in opinions lie.	Description of the environment provided based on site-visit and technical investigations at, or otherwise relevant, to specific site of activity. Use of plans and photographs are useful to provide context for the proposed activity, and support statements made in assessment/description. Information gathered and presented is consistent with published guidelines/requirements (e.g. natural inland wetlands delineated using Ministry for the Environment Wetland Delineation Protocols). Clear identification of "existing environment" as potentially modified by permitted activities and consented activities that are likely to be exercised.	Description of the environment provided. Used GIS and literature as primary source of information. May not have involved a site visit or technical investigation of potential values. Information provided not in accordance with guidelines (or doesn't correctly follow them). Information may require significant verification. Description of environment reflects current state but does not fully describe how this may be modified by activities already authorised to occur (i.e. permitted activities) and consented activities likely to occur.

¹⁶ Schedule 5, clause 5(4), clause 6 and clause 7

Excellent	Good	Adequate
Environmental effects		
Schedule 5, clause 6 describes the information required to assess environmental effects however in addition to this, the following is expected by CRC based on our experience processing significant consents. In addition to the effects listed below which must be assessed, the application has undertaken a comprehensive assessment of potential effects of the proposal. Conclusions in application supported by technical assessments. Assessment methods in accordance with published guidance (where available) and/or agreed with CRC technical experts prior to lodgement. Quantitative assessments preferable but recognise that qualitative may be sufficient in some situations where justified. Assessment assesses effects over the entire duration applied for, including consideration of whether effects are adequately addressed by other consents/permitted activities over that duration. Draft technical reports reviewed by CRC staff through pre-application process. Discussions between technical experts from relevant parties held to identify any misunderstandings or differences of opinions. Feedback from pre-application work incorporated where appropriate. Solutions focused approach to outstanding adverse effects. Recommendations by technical experts incorporated into application (mitigations, monitoring etc) or where not adopted by applicant reasons clearly explained (such as applying onerous test).	Assessment includes the relevant matters specified in Schedule 4 c6 and c7, of the RMA, including consideration of effects on persons (and the outcome of any consultation, if any) and, for discharges, includes description of any alternative methods of discharge. Assessment of effects undertaken appropriate to scale and significance of proposal. Assessment methods in accordance with published guidance (where available). Quantitative assessments preferable but recognise that qualitative may be sufficient in some situations. Assessment assesses effects over the entire duration applied for, including consideration of whether effects are adequately addressed by other consents/permitted activities over that duration. Draft technical assessments provided prior to lodgement but with little time for meaningful technical review.	Assessment of effects described in Schedule 5, s7. Quantitative assessments preferable but recognise that qualitative may be sufficient in some situations. Assessment assesses effects over the entire duration applied for, including consideration of whether effects are adequately addressed by other consents/permitted activities over that duration. No sharing of draft technical reports with CRC prior to lodgement.

Excellent	Good	Adequate
Effects which must be considered for any proposal: any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: any physical effect on the locality, including landscape and visual effects¹⁷: a. any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity: b. any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations: c. any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: d. any unreasonable emission of noise: e. any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations. <i>Note Schedule 5, section 8 provides a list of information required in application for subdivision or reclamation while section 9 details information to be provided for freshwater fisheries activities.</i>	Effects which must be considered for any proposal¹⁸: a. any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: b. any physical effect on the locality, including landscape and visual effects: c. any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity: d. any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations: e. any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: f. any unreasonable emission of noise: g. any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations. <i>Note Schedule 5, section 8 provides a list of information required in application for subdivision or reclamation while section 9 details information to be provided for freshwater fisheries activities.</i>	Effects which must be considered for any proposal¹⁹: a. any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: b. any physical effect on the locality, including landscape and visual effects: c. any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity: d. any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations: e. any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: f. any unreasonable emission of noise: g. any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations. <i>Note Schedule 5, section 8 provides a list of information required in application for subdivision or reclamation while section 9 details information to be provided for freshwater fisheries activities.</i>

¹⁷ Schedule 5, clause 7¹⁸ Schedule 5, clause 7¹⁹ Schedule 5, clause 7

Excellent	Good	Adequate
If the activity includes the use of hazardous installations, a comprehensive assessment of any risks to the environment that are likely to arise from such use supported by technical advice and reviewed through pre-application processes with CRC.	If the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use.	If the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use.
Where the discharge of any contaminants is proposed, a detailed description of the nature of the discharge ²⁰ , sensitivity of the receiving environment to adverse effects and any possible alternative methods of discharge including into any other receiving environment ²¹ .	Where the discharge of any contaminants is proposed, a description of the discharge and sensitivity of the receiving environment to adverse effects.	Where the discharge of any contaminants is proposed, a description of the discharge and receiving environment.
Economic assessment		
A detailed economic assessment has been provided, and this has influenced and shaped the project.	A cost benefit analysis has been undertaken and acknowledgement of findings.	Some level of economic assessment provided.
Assessment of affected parties²²		
Applicant consulted with CRC to ensure agreement on identification of affected parties. Detailed assessment of impacts and mitigations provided.	Affected parties mostly agreed with CRC. Some assessment of impacts on them.	Application identifies affected parties with no discussions or agreement with CRC. Limited to no consideration of potential mitigation measures.

²⁰ Schedule 5, clause 6(1)(c)(i)

²¹ Schedule 5, clause 6(1)(c)(ii)

²² Schedule 5, clause 6(1)(e)

Excellent	Good	Adequate
Additional information		
Legal matters		
Comprehensive assessment of all relevant legal issues.	Any legal matter addressed and discussed by drawing on relevant case law.	Any legal matters addressed.
Record of consultation		
Detailed table of consultation shows pre-engagement and further engagement, detailed within an appendix of changes made with all parties that were required to be notified under the FTAA.	Full records provided of all parties that were required to be notified under the FTAA. Evidence of further consultation beyond notification and some assessment of outcomes.	Simple records provided of all parties that were required to be notified under the FTAA.

RE: Sabys 101 Limited and lodgement of a Referral Application

From David Sluter <s 9(2)(a)>

Date Thu 2026-04-16 12:15 PM

To Kerstin Ghisel <s 9(2)(a)>

Hi Kerstin,

Thanks for sending that update through and notifying us of your intention to lodge.

I will get the team looking at this one too and we will get a response to you.

Just to clarify, were you hoping to discuss this project as well as John Paterson Drive at the meeting tomorrow? Just want to make sure I have the right planners from our team there.

Kind regards

David

IN-CONFIDENCE

From: Kerstin Ghisel <s 9(2)(a)>
Sent: Wednesday, 15 April 2026 4:11 pm
To: David Sluter <s 9(2)(a)>
Subject: Sabys 101 Limited and lodgement of a Referral Application

Caution: This is an email from an external party. Please take care when clicking links or opening attachments.

Hello David

Sabys 101 Limited wishes to formally notify the Canterbury Regional Council that Sabys 101 Limited will be lodging a referral application under the Fast-track Approvals Act 2024 ("FTAA") for the Franco Farms development ("the Project"). The Project will establish:

- approximately 348 residential lots and associated residential units.
- A neighbourhood centre (approximately 2,115m²) to provide for the future resident's day to day needs located adjacent to Sabys Road.
- A new reserve and enhanced riparian margin adjacent to Knights Stream, the Halswell River and the Creamery Drain.
- The proposal incorporates an integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve (approximately 2,236m²) and stormwater basins with associated wetland areas (approximately 5.6ha) to the south of the application site.
- Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure.

Sabys 101 considers that the Project is a development project that would have significant regional benefits, and that referring the project into the FTAA regime will facilitate the project and is unlikely to materially affect the efficient operation of the approvals process, and is clearly aligned with section 22(1) of the FTAA.

As you are aware, Sabys 101 Limited has already commenced consultation with the Canterbury Regional Council for this Project, including attending meetings with council staff in December 2025 to discuss the proposal, along with various email correspondence and additional planned pre-lodgement meeting on 17 April. We thank you for your time in participating in these sessions.

Approvals

A referral application must specify all the approvals that are proposed to be applied for under the fast-track approvals process under the FTAA. The following approvals will be required:

- Schedule 5 approvals relating to the Resource Management Act 1991 ("the RMA"); and
- Schedule 7 approvals relating to the Wildlife Act 1953 ("Wildlife Act")
- Schedule 8 approvals relating to Heritage New Zealand Pouhere Taonga Act 2014 ("HNZ Act")

Of particular relevance to the Canterbury Regional Council are the approvals required under the FTAA that would otherwise be required under the RMA.

The FTAA as amended on 31 March 2026 requires the following prior to lodging a referral application with the EPA:

- Consultation requirements in section 11(1)(a), which are not relevant to the Project; and
- Written notification to (relevantly) the relevant local authorities, any relevant iwi authorities, hapū, and Treaty settlement entities, and the relevant administering agencies.

In accordance with section 11 of the FTAA, Sabys 101 Limited gives notice that it intends to lodge a referral application for the Project. It will not file its referral application for 20 working days following the date of this email in order to provide the Canterbury Regional Council the opportunity to respond to this notice.

Project description

The Project is located at Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573) and 6 Wroots Road. I **attach** a current (draft and tentative) scheme plan in order to give you a better understanding of the Project details.

If you have any questions, please get in touch, and I look forward to hearing from you in respect of this notice.

Thanks,
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL

Senior Associate

s 9(2)(a)

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8140

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Christchurch Central City,
Christchurch 8013

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Pre-Application Advice for Sabys 101 Limited – RMA262783

Disclaimer: This technical advice note does not constitute legal advice and should not be relied upon as such. Please note this preliminary advice has been given prior to any official guidance from the Ministry for the Environment relating to Canterbury Regional Council's role under the Fast-track Approvals Act 2024.

Meeting Date:	03 December 2025
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Executive Summary

Sabys 101 Limited (Sabys 101) (the applicant) have sought a meeting with Canterbury Regional Council (CRC) to discuss the potential option of using the Fast-track Approval Act (FTAA) for the Sabys Road Development Project. The project is not listed in Schedule 2 of the FTAA.

CRC Staff – Victora Watt (Planning), Anna Stewart and David Sluter (Consents)
Applicant – Kerstin Ghisel and Ruth Evans (Barkers) and Todd Inness (DLS)

Introduction

Fast-track Act Consenting:

Under the FTAA, the applicant is required under section 11(1)(a) to consult with relevant local authorities. The applicant will need to provide evidence of this consultation as part of their application.

This pre-application meeting forms part of this consultation and discusses the process going forward for any potential applications by Sabys 101 under the FTAA.

Sabys Road Development Project:

The applicant requested a pre-app meeting to discuss the proposed Fast-track application. Specifically, the applicant sought advice relating to the referral application and how best to go about consultation.

Minutes – Notes – Advice

- Part zoned residential and rural.
- The Nottingham Stream flows through the middle of the development and marks the boundary between Selwyn District Council (SDC) and Christchurch City Council (CCC).
- Part of the project within the CCC boundary has already been lodged for a subdivision consent but has not been granted yet. This area will also be included in the Fast-track application as even if the consent is granted, a variation will be required.

- Big reserve areas around the drains and the Nottingham Stream.
- The stream will be a key area to address with stream crossings required, the need to get stormwater across the stream and not in it and managing first flushes.
- Existing flooding issues associated with Nottingham Stream.
- A stormwater facility will be built in the bottom reserve area.
- Need to work through the stormwater treatment sitting on SDC land servicing CCC land.
- The usual subdivision consents will be applied for including stormwater, discharge, earthworks and dewatering consents.
- Proposal will rely on CCC supply water and stormwater will be treated on site. Wastewater will either be treated on site or upgrade to the CCC system, yet to be determined.
- Technical specialists have already been engaged and already working on high level reports. Includes economic, high level geotechnical, contaminated land, ecology, traffic and highly productive land assessments.
- The highly productive land assessment will have to look at the productive viability of the land and will depend on the Land Use Classification.
- The applicant is looking to be consistent with the Regional Policy Statement in regards to 15 houses per hectare.
- Interested to see what comes out of the Amendment Bill and what the Government Policy Statements will bring.
- Discussion about regional significance and that it is hard to quantify.
- CRC discussed the fast-track process to date, including timeframes, the referral process and consultation. The applicant is keen to work with CRC throughout the process.
- Meeting with SDC soon and then CCC at some stage.

Next Steps:

ACTION – Applicant to lodge pre-application request for CRC to process.

ACTION – CRC to confirm if the waterways on the property including Nottingham Stream are part of the local drainage network.

ACTION – CRC to provide the applicant the local runanga contacts.

Additional Information

Charging: CRC will charge for pre-application advice under the cost RMA262783

Communication (going forward): David and Jeremy from CRC and Kerstin for the applicant

Process: Applicant likely to commit to the Fast-track process

Timelines for pre/ referral and substantive notification: The applicant has initially indicated that they intend to lodge the referral application in February and if successful the substantive application before the end of the year.

Minutes

Project: Sabys and Candys Fast Track Referral

Date: 17 April 2026

Time: 10:00 am

Location: Online

Attendees:

Name	Role/Organisation
Anna Stewart	Canterbury Regional Council – Environment Canterbury
Dwayne Daly	Canterbury Regional Council – Environment Canterbury
Sam Prystupa	Canterbury Regional Council – Environment Canterbury
Jeremy Ecker	Canterbury Regional Council – Environment Canterbury
David Sluter	Canterbury Regional Council – Environment Canterbury
Kerstin Ghisel	Barker & Associates
Maisie Fisher	Barker & Associates

Item	Detail	Action
1	Introductions and round the room: - Jeremy Ecker Planner working on the project - Copy in Dwayne Daly	
2	Update on timeframes and progress: - Reporting underway - Consultation underway - Wastewater being the main point to work through. Two options provided in the referral applications - DoC: May require lizard and bat wildlife approvals. Further investigations post winter. Can occur through normal channels or FT application. - Heritage NZ – may need archaeological approval. Can occur through normal channels or FT application. - Iwi – consulted with two Iwi's and will be undertaking consultation with Ngā Tahu. No real concerns. - NZTA – consultation undertaken.	
3	CRC – draft rules assessment completed.	Provide CRC with draft assessment
4	Contamination – potential for contamination. DSI underway.	

Item	Detail	Action
5	Geotech – waterways, trying to understand lateral spread. 20m setback from Nottingham Stream. Lots of waterways applicable to the site, left natural, one may be piped.	
6	Ecological reports – high level. Crossings over the waterways. The stormwater facility is proposed for 6 Wroots road, working through stormwater disposal mechanism for getting SW from the north to the south. Potential for this to be underneath the stream due to the size of the pipes not fitting on the bridges.	CRC to check bylaw layer surrounding streams. Global CCC consent might only apply to CCC land. Working with CCC to determine approach here.
7	Reasons for consent: See it as needing the usual breadth of consents when waterways are applicable.	
8	HPL – LUC 1 and 2 Have reporting on this. Trying to navigate this and would appreciate advice on this. Inconsistent advice from other panel decisions on rural urban fringe zoning, creates challenges. Helps where sites are adjacent to existing urban environment.	Keen to work with CRC on this.
9	Overview from CRC: - Noticed there is varying degrees of information at different stages coming through at draft stages. The more information available early then the easier it is to work through the matters of contention. Front loads a lot of the conversations but makes it easier when the applications go to the panel for review. - Don't feel nervous about sharing draft information to CRC early in the piece, this way the specialists on both sides can work through items together to streamline things. - Keen to work together through the preparation of the draft to simplify the decision-making process for the panel.	Continue working together as we work through the substantive applications.
10	AOB - Only considering FT. - Specialist information is very high level at this stage, just enough to support the referral application. - Northern portion of 101 Sabys Rd (Franco Farms) regional consent just lodged yesterday for the residential portion of the site. Something for CRC to have a look at so they can see relevant specialists and information.	Draft referral applications being reviewed. Can check with client whether they are happy for drafts to be shared to work through. Kerstin can share the draft referral rules tables. CRC have availability to specialists in-house who

Item	Detail	Action
	- Neighbourhood centre on Candys Road to support neighbourhood. Included as part of referral. -	can direct our specialists on their scope to save time/money for the substantive applications.
11	Guidance document for FT has been shared to Kerstin.	CRC to share some names of people from CCC they have worked with collaboratively on FT projects.
12	Economic assessment – key part of the FT, quantifying the significance of the application for regional significance. Meets the test.	Highlighting the importance of this in the referrals. Have a look at the Darfield application, a good guide for significance.
13	Lodgement – wary of amendments to the act so trying to cover bases to ensure application doesn't get rejected.	

Project: Candys/Sabys Fast-Track Referral

Date: 3 December 2025

Time: 10-1130am

Location: Canterbury Regional Council

Attendees: David Schulter (CRC), Victoria Watt (CRC), Anna Stuart (CRC) Todd Innes (DLS), Kerstin Ghisel (B&A), Ruth Evans (B&A)

- David – PM, fast-track coordination
- Victoria – senior planner
- Anna – TL for significant consents
- S/w – may take some of the upstream catchment
- S/w needs to get across the river without getting it into it
- Road crossings across the river
- S/w basin on Selwyn land but servicing CCC – opportunity for CCC to come up with something with SDC to use the rural SDC land
- Potential to address flooding of Halswell River and Nottingham Stream
- Consents – s/w disposal, dewatering
- Water – council supply
- Wastewater – to work through with CCC. Plan to facilitate upgrades
- David – will need assessments for flooding, stormwater, servicing
- Victoria – NPSHPL expectations. CRC is pretty realistic on approach. If so small that it is not HPL then being pragmatic. Draft mapping being used as a guide. When looking at under fast-track you are weighing up economic costs and benefits. Particularly if very limited potential for productive use. Just argue the viability assessment, no need to do soil testing
- Early engagement will help with the panel convenor setting timeframes, other experts, etc.
- Happy to see a workable draft prior to substantive, then ECan can reflect this in comments to the panel.
- Regional significance test – no guidance on this yet.
- NPSUD – adding capacity and contributing to well-functioning urban environment
- 15/ha/ha ok
- ECan happy to provide high level advice on obs and pols of RPS
- ECan working on guidance on what good looks like.
- Anna / David will send through pre app request form to start the engagement – use this for referral. Not too worried about lots of engagement pre referral, can engage informally once it is lodged.
- Will check drain bylaw issue when pre app form is submitted and look at whether any of the waterways are a drain under the bylaw.
- Iwi – ECan will come back with contacts

- Airport noise contours. CIAL are judicially reviewing the Waimak PDP for not including the contours in the district plan.
- Anna can send through DOC and NZTA contacts
- Standard pre app form. Use David as contact.

Selwyn District Council



Urban & Environmental

11 May 2026

Sabys101 Limited

Sent by email: s 9(2)(a)

Tēnā koe Kerstin,

Fast Track Approval Referral Application for the Franco Farms Development, Halswell – Local Authority Notification Response

Thank you for your notice received by email on 17 April 2026, advising Selwyn District Council of the intention of Sabys 101 Limited to lodge an application seeking referral under the Fast-track Approvals Act 2024 (FTAA), for the Franco Farms Project in Halswell. We provide the following response to the notice given under section 11 of the FTAA.

The following comments are made without having viewed a draft referral application and related assessments that would be required to understand the benefits of the proposed development. Given this it is not clear on what basis the project could deliver at least a significant regional benefit, which is the key criteria for the project to be referred under the FTAA.

It is noted that a small portion of the proposed development is in Selwyn District and that the larger portion and the majority of the residential lots to be created by the proposed subdivision are located within the Christchurch City Council territorial boundary.

It is assumed that servicing of the wider site will involve connection to potable water and wastewater reticulation administered by Christchurch City Council, given that Selwyn Water Limited (SWL) does not have existing connection to water infrastructure within the vicinity of the development. Should referral of the project be approved, there will need to be agreements reached between SDC/SWL, CCC and the developer on the provision of this infrastructure, including the necessary development contributions, and any vesting of reserves and easements required.

A large area of the development to occur in Selwyn District as part of the proposed subdivision is to be set aside for stormwater management and reserved for that purpose. Again, some agreement would need to be reached on the costs associated with vesting this reserve in SDC and the ongoing management of the reserve and the development contributions available to offset this cost. There is no detail provided on the nature of stormwater treatment and future management, whether this will be a wetland area or landscaped open space, which will be a factor in ongoing costs to SDC in managing this reserve.

The entire site consists of LUC 2 soils and is to be treated as Highly Productive Land (HPL) given the interim definition in the National Policy Statement for Highly Productive Land (NPS-HPL) and is part of a wider contiguous area of HPL between Halswell and Prebbleton and toward Lincoln. The NPS-HPL

seeks the protection of HPL for use in land based primary production, including by avoiding subdivision of HPL. The proposed subdivision would not likely be provided for under any of the exemption pathways in the NPS. This is likely to be a significant constraint to gaining authorization to develop the site under the current RMA settings. The permanent loss of highly productive soil through subdivision would constitute an adverse effect of this activity that cannot be avoided or minimized. The loss of highly productive soil and the loss of land based primary production are also costs that should be factored in the economic assessment of the significance of the benefits of the project.

I note that adjoining the site, but separated by the Halswell River, is the Hohepa Homes Trust Special Purpose Zone as set out in the Partially Operative Selwyn District Plan (PODP). This special purpose zone recognises the role of existing development in that zone and the important role of providing services for people with intellectual disabilities in a rural setting. While the PODP zoning and related provisions provide for anticipated development within the zone rather than placing any greater restriction on adjoining sites, there is potential for adverse effects of development on the activities of the Trust. Should this project be approved for referral, the Trust is a party that should be consulted in the preparation of the substantive application.

For further consultation or discussion on any of the issues raised in this letter, please contact me in the first instance on s 9(2)(a)

Naku noa

Geoff Deavoll

Policy Team Lead

RE: Sabys 101 Limited and lodgement of a Referral Application

From Geoff Deavoll s 9(2)(a)

Date Thu 2026-04-16 10:13 AM

To Kerstin Ghisel s 9(2)(a)

Cc Richard Bigsby s 9(2)(a)

Hi Kerstin,

Thank you for providing this notice and I confirm that this has been received.

We will consider this further and provide any response that we might have at this stage in the process. I will be in touch if we need any further information or need to discuss any issue before providing a formal response.

Kind regards

Geoff

From: Kerstin Ghisel s 9(2)(a)
Sent: Wednesday, 15 April 2026 4:08 pm
To: Richard Bigsby s 9(2)(a) Geoff Deavoll s 9(2)(a)
Subject: Sabys 101 Limited and lodgement of a Referral Application

Hello,

Sabys 101 Limited wishes to formally notify the Selwyn District Council that Sabys 101 Limited will be lodging a referral application under the Fast-track Approvals Act 2024 ("FTAA") for the Franco Farms development ("the Project"). The Project will establish:

- approximately 348 residential lots and associated residential units.
- A neighbourhood centre (approximately 2,115m²) to provide for the future resident's day to day needs located adjacent to Sabys Road.
- A new reserve and enhanced riparian margin adjacent to Knights Stream, the Halswell River and the Creamery Drain.
- The proposal incorporates an integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve (approximately 2,236m²) and stormwater basins with associated wetland areas (approximately 5.6ha) to the south of the application site.
- Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure.

Sabys 101 considers that the Project is a development project that would have significant regional benefits, and that referring the project into the FTAA regime will facilitate the project and is unlikely to materially affect the efficient operation of the approvals process, and is clearly aligned with section 22(1) of the FTAA.

As you are aware, Sabys 101 Limited has already commenced consultation with Selwyn District Council for this Project, including attending a meeting with council staff in December 2025 to discuss the proposal, along with various email correspondence. We thank you for your time in participating in these sessions.

Approvals

A referral application must specify all the approvals that are proposed to be applied for under the fast-track approvals process under the FTAA. The following approvals will be required:

- Schedule 5 approvals relating to the Resource Management Act 1991 ("the RMA"); and
- Schedule 7 approvals relating to the Wildlife Act 1953 ("Wildlife Act")
- Schedule 8 approvals relating to Heritage New Zealand Pouhere Taonga Act 2014 ("HNZ Act")

Of particular relevance to Selwyn District Council are the approvals required under the FTAA that would otherwise be required under the RMA.

The FTAA as amended on 31 March 2026 requires the following prior to lodging a referral application with the EPA:

- Consultation requirements in section 11(1)(a), which are not relevant to the Project; and
- Written notification to (relevantly) the relevant local authorities, any relevant iwi authorities, hapū, and Treaty settlement entities, and the relevant administering agencies.

In accordance with section 11 of the FTAA, Sabys 101 Limited gives notice that it intends to lodge a referral application for the Project. It will not file its referral application for 20 working days following the date of this email in order to provide the Selwyn District Council the opportunity to respond to this notice.

Project description

The Project is located at Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573) and 6 Wroots Road. I **attach** a current (draft and tentative) scheme plan in order to give you a better understanding of the Project details.

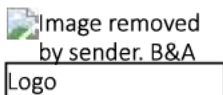
If you have any questions, please get in touch, and I look forward to hearing from you in respect of this notice.

Thanks,
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate
s 9(2)(a)

PO Box 1749, Christchurch
8140
Level 3, 61 Cambridge Terrace,

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Geoff Deavoll

POLICY TEAM LEADER

s 9(2)(a)



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www.selwyn.govt.nz
www.selwynlibraries.co.nz
www.selwyn.getsready.net

Meeting notes

Project: Candys/Sabys Fast-Track Referral

Date: 9 December 2025

Time: 1-2pm

Location: Selwyn District Council

Attendees: Ian Thompson, Brett Trumper, Richard Bigsby (SDC), Zani van der Westhuizen (SDC), Todd Innes (DLS) Kerstin Ghisel (B&A), Ruth Evans (B&A)

- Geoff (not able to make this meeting). Policy role, involved in fast-tracks

Stormwater

- Todd – City keen to do lots in terms of final treatment in this area. Also Nottingham stream and Halswell River. CCC see benefits here to development in this area.
- SDC block – big basin, first flush and attenuation. Potentially oversized attenuation to address overloading on two rivers.

Water

- Fine from CCC perspective. No SDC network so would rely on CCC network.

Sewer

- Trickiest. All of Tai Tapu discharges to Sabys Road. Unsure how this is going.
- Local pressure network services for this area currently.
- Complex – deal with Selwyn discharge and City discharge.
- Ideally do low / local pressure due to fall of land, gravity main not likely to work. Send sewerage from SDC block to CCC sewer.
- Local pressure is the CCC preference.
- 70 – 80 lots in Selwyn block 15-17 hh/ha.
- Options – easements or agreements between the councils.
- CCC to take lead. Clunky to have separate arrangements with SDC.
- Zani – lot's dependent on CCC and what they will and will not accept. SDC make it work. Lots will be CCC owned on SDC land. SDC unlikely to take over a lot of it.
- SDC will share Marshes Road consents.
- Also keen to get any information on the Tai Tapu discharge and how that works

Other

- Similar to Arbour Green, directly adjacent to urban environment. Economics, makes sense to incorporate in this context.
- Have legal advice not to do soil testing because of Bluegrass.
- Iwi – possibly two groups – Angela Burton
- Richard – regional consent – check with CCC re. transfer of maintenance for regional consent. Todd – not in mapped area for CCC global.

Christchurch City Council

B&A

Urban & Environmental

14 May 2026

Sabys 101 Limited
c/- Kerstin Ghisel
Barker and Associates
Level 3, 61 Cambridge Terrace
Christchurch Central
Christchurch 8013

03 941 8999
53 Hereford Street
Christchurch 8013
PO Box 73013
Christchurch 8154
ccc.govt.nz

By email: s 9(2)(a)

Fast-track Approvals Act 2024 – Notification of Intent to Lodge Referral Application

Sabys 101 Limited – Franco Farms Development

1. The Christchurch City Council (CCC) received a notification from Sabys 101 Limited advising of their intention to lodge a referral application under section 13 of the Fast-track Approvals Act 2024 (FTAA) to subdivide and use land for residential development.
2. The purpose of this memorandum is to respond to this notification under FTAA section 11(1)(c), and identify matters that the applicant may want to consider prior to lodging a referral application.

Prior Council engagement

3. CCC Officers and representatives of the applicant have previously met to discuss potential development of the site and means through which this development could be facilitated, however no detailed proposal has previously been circulated to the CCC for comment.

Information provided

4. The information provided with the notification is attached as Appendix 1, being:
 - 4.1. A description of the proposal;
 - 4.2. A draft and tentative scheme plan.
5. For clarity, it is noted that the following have not been provided:
 - 5.1. Any information detailing the national or regional benefits anticipated;
 - 5.2. Any information detailing how the project would be facilitated by a referral to the fast-track approvals process;
 - 5.3. The number and nature of approvals required and sought under the Resource Management Act 1991;
 - 5.4. The anticipated commencement and completion dates of work;
 - 5.5. Whether the project is proposed to be staged;
 - 5.6. Any anticipated and known adverse effects of the proposal;
 - 5.7. Any concept stage plans for infrastructure necessary to service the development.

Scope of comments

6. Noting the level of detail provided with the application the scope of comments provided in the memorandum and is of a general nature and not exhaustive.

7. In particular, it is considered that insufficient information has been provided to enable comment in relation to:
 - 7.1. Earthworks;
 - 7.2. Geotechnical matters;
 - 7.3. Infrastructure design within the subdivision area;
 - 7.4. Natural hazards;
 - 7.5. Natural heritage, indigenous biodiversity and ecosystems;
 - 7.6. Use of Highly Productive Land;
 - 7.7. Waterway values.
8. Information to assess and consider these matters is anticipated to be provided at substantive stage, should the application for referral be accepted.

Site and area context

9. The site has been identified as Lots 2-3 DP 58573, Lots 2-3 DP 68573 (having the address 101 Sabys Road), and 6 Wroots Road (being legally described as Part Lot 1 DP 1537, within Selwyn District). It appears that the reference to Lots 2-3 DP 58573 may be in error, as no allotment with that legal description is apparent in Canterbury.
10. While identified as forming part of the proposed development area, Lot 2 DP68573 is zoned Residential New Neighbourhood, and a subdivision consent, RMA/2025/2041, has been granted for the creation of 206 residential allotments. An area in which residential units are proposed in this development is required for the stormwater management facility of RMA/2025/2041. Any arrangements to ensure that development will continue to be appropriately serviced in terms of stormwater management should be provided alongside the referral application, including whether an amendment to RMA/2025/2041 is required.

Local and regional planning documents, including spatial strategies

11. Where the site falls in the Selwyn District, it is zoned Inner Plains under the Operative Selwyn District Plan and General Rural Zone under the Partially Operative Selwyn District Plan. Comment on any overlays and zoning implications should be sought from the Selwyn District Council (SDC).
12. The remaining parts of the site within Christchurch District are subject to the Christchurch District Plan, and zoned Rural Urban Fringe and Open Space Water and Margins, and subject to a range of overlays, including:
 - 12.1. Flood Management Area and High Flood Hazard Management Area;
 - 12.2. Liquefaction Management Area;
 - 12.3. Water Body Setback from Upstream and Downstream waterways;
 - 12.4. Site of Ecological Significance (SES/LP/29 – Knights and Nottingham Streams).
13. As the site is zoned rural, it is not subject to wider spatial strategies seeking to coordinate and facilitate development over a wide area, inclusive of multiple property owners.
14. Progressing development on greenfield land that is not subject to area planning risks disjointed development, small and inefficient facilities, and potential for rework required to upgrade undersized infrastructure in future. Such development would be inconsistent with Christchurch District Plan (CDP) Strategic Objectives 3.3.1 *Enabling recovery and facility the future enhancement of the district* and 3.3.8 *Urban growth, form and design*, which broadly seek to enable development in an integrated manner.
15. These provisions are consistent with other local and regional planning documents, in particular:
 - 15.1. The Canterbury Regional Policy Statement (CRPS), which sets the resource management aspirations for the Canterbury Region, with Chapters 5 *Land-use and Infrastructure* and 6 *Recovery and rebuilding of Greater*

Christchurch particularly relevant to land use and development. These chapters seek to enable land use and development in greenfield priority areas, as shown in Map A of Chapter 6, where well supported by infrastructure, including strategic connections.

- 15.2. The Greater Christchurch Spatial Plan¹ (GCSP), which has been adopted by CCC and SDC as the Future Development Strategy under the National Policy Statement on Urban Development 2020, to inform the broad locations in which development is anticipated to inform requirements for development and other infrastructure, and transport corridors. The GCSP identifies areas in which greenfield development is anticipated, as shown in Map 14. The GCSP acknowledges additional greenfield development may be required outside priority areas where a Housing and Business Capacity Assessment identifies a need for development, and the development is well integrated with existing urban areas.
16. The applicant should demonstrate the extent to which the development is consistent with the relevant provisions of these documents when the referral application is lodged.

Infrastructure and servicing constraints

Water supply

17. With regard to the availability of connections to and potential upgrades required for the provision of water supply to the site, Michelle McDonald, Team Leader Asset Planning Water and Wastewater, has noted:
 - 17.1. Christchurch operates a decentralised groundwater-based water supply system. To achieve cost-effective compliance with the Drinking Water Quality Assurance Rules, Christchurch City Council seeks to minimise the need for additional pump stations and treatment plants, while working within the constraints of the existing piped network.
 - 17.2. The proposed Candys and Sabys Block is adjacent to the West Water Supply Zone (WSZ). The nearest pump station and treatment plant is PS1102 Dunbars WS that is supported by the Sutherlands 1 reservoir.
 - 17.3. The Three Waters Unit has assessed the capacity of the city's water supply against 50-year growth projections and identified a need for additional supply capacity in the West WSZ. Capacity increases at existing pump station and treatment sites within the West WSZ can be achieved by adding new groundwater wells. The Water Supply Rezoning Master Plan also calls for additional storage at the Sutherlands 1 Reservoir Site.
 - 17.4. A new connection to the existing water supply network will require careful planning and likely involve upgrades to existing water mains ahead of their planned renewal schedule.

Wastewater

18. With regard to the availability of connections to and potential upgrades required for the management of wastewater from the site Ms McDonald has noted:
 - 18.1. Christchurch city operates a central wastewater network with wastewater conveyed through a series of pump stations and trunk sewers to the central Christchurch Wastewater Treatment Plant located at Bromley on the eastern edge of the city.
 - 18.2. The Three Waters Unit has commenced a review of the city-wide wastewater master plan in response to updated growth projections that the city could grow by 67,000 residential units over a 50-year planning horizon to support a population of approximately 550,000. Most of the projected growth is expected to be accommodated through urban intensification, with an expected 25% considered for greenfield development.
 - 18.3. Hydraulic modelling of the projected 50-year wastewater demand identifies multiple network deficiencies, including within key trunk sewers and terminal pump stations. As a result, future spatial planning will have to consider decentralized wastewater networks with separate wastewater treatment plants rather than reliance on capacity being available to convey wastewater to the central Christchurch Wastewater Treatment Plant. To avoid major infrastructure upgrades that would be needed to accommodate the 50-year demand, projected growth would need to be reduced by approximately 20,000 residential units. This aligns with the growth portion allocated

¹ <https://www.greaterchristchurch.org.nz/assets/Documents/Work-Programme/Greater-Christchurch-Spatial-Plan/Greater-Christchurch-Spatial-Plan-2024.pdf>

to greenfield development and is consistent with the fact that infrastructure was designed to service the current zoned city boundaries.

- 18.4. The wastewater network downstream from the proposed Candys & Sabys Block has capacity only to service the existing Southwest Halswell zoned land and to continue meeting the agreement with Selwyn District Council to accept flows of up to 7.5 L/s from Tai Tapu.
- 18.5. Increasing capacity to service additional development would require significant infrastructure upgrades, including:
 - Upgrades to the Sabys and O'Halloran Drive sewer, that would trigger;
 - An upgrade of the 90 L/s PS61 O'Halloran Drive pump station and its 1.1-kilometre rising main; that would trigger
 - An upgrade of the 200 L/s PS60 Halswell pump station (recently upgraded to its maximum capacity) and its 3.9-kilometre rising main; that would trigger;
 - An upgrade of the 400 L/s PS105 Wigram pump station and its 1.9 kilometre rising main.

These upgrades would also result in the need for further upgrades to major trunk sewers and terminal pump stations.

- 18.6. Servicing the proposed development as a local pressure sewer network has been considered but will not sufficiently address downstream capacity constraints as sufficient capacity must be available to accept wastewater from the full local pressure sewer network (including Southwest Halswell) following an extended rainfall event. Adequate capacity is therefore required to enable wastewater discharge once the 24-hour on-property storage limit of individual pump units have been reached.

Stormwater

19. With regard to stormwater Brian Norton, Senior Stormwater Planning Engineer at the Council, has reviewed the information provided and advised the location of the stormwater management facility as shown is not fundamentally opposed, however there are several uncertainties around the establishment and operation of the facility, in particular:
 - 19.1. The stormwater management facility as shown is located within Selwyn District, and it is unclear what is proposed in terms of the ownership and operation of this facility.
 - 19.2. While CCC holds a global consent for discharge of stormwater within the Christchurch District, any discharges within Selwyn would not be provided for in this consent, and a separate discharge consent would be required. Such a consent could be sought and considered within the Fast-track process.
 - 19.3. A significant quantity of stormwater generated within the overall development would need to be conveyed over or under Knights Stream, and it is not clear how this would be achieved. An engineering concept for the conveyance of this stormwater should be provided at referral stage to demonstrate the development could be serviced in terms of stormwater management, or an alternative stormwater management arrangement proposed.

Transport

20. With regard to the existing transport environment and potential effects of a residential development of this scale, Andrew Milne, Team Leader Asset Planning Transport has advised:
 - 20.1. From a public transport serviceability perspective, Christchurch Infrastructure Design Standards require not less than 90% of dwellings to be within 500m from a proposed bus route. The Site sits wholly outside of its nearest bus route, 100, which is a lower frequency route with an expected 400m catchment. Environment Canterbury are currently undertaking a route review. However, at this time there is no certainty that the 100 service will be continued or changed as a result of the review, and it is unclear the degree to which the Site would be serviced by public transport into the future.
 - 20.2. Current-state operation of the road network has been assessed using Christchurch Assignment and Simulation Traffic (CAST) Model, using 2023 base model scenario.

- 20.3. The existing transport network surrounding the proposed Site currently operates with relatively moderate constraints and does not indicate immediate or significant localised infrastructure deficiencies during the morning and evening peak periods.
- 20.4. However, the CAST outputs also demonstrate that at the wider strategic network, particularly NZTA Christchurch Southern Motorway (CSM) off-ramp and Springs Road approaches, are already sensitive to incremental increases in traffic demand due to the constrained operating conditions observed at key downstream intersections and CSM off-ramp connections.
- 20.5. It is likely that some traffic attributable to the development would add pressure to Christchurch Southern Motorway off-ramp and Springs Road approaches.
- 20.6. The CAST base model indicates that the existing road corridors associated with Springs Road, Halswell Junction Road, and the Christchurch Southern Motorway off-ramp are currently operating close to their practical capacity, with only limited remaining storage and operational capacity available to accommodate additional development-related traffic demand.
- 20.7. At the moment, traffic signals operating on the Halswell Junction Road approach during peak periods are used to manage and discharge traffic into the Halswell Junction Road / Springs Road roundabout at controlled intervals. This arrangement creates short traffic gaps that allow vehicles travelling from Selwyn District along Springs Road to access the roundabout.
- 20.8. However, the outputs from CAST base model suggests that the existing traffic demand is pushing near its practical limit, with various approaches operating above 90% capacity and any further increase in traffic demand may lead to further congestion and potential spillback effects on downstream road links and motorway ramp infrastructure.
- 20.9. Overall, based on the findings of the CAST base model, it is strongly recommended that any future development generating a significant increases in traffic demand, should be subject to careful and comprehensive transport assessment, given the existing operational constraints and limited remaining capacity of the surrounding transport network infrastructure and that any necessary infrastructure upgrades are appropriately addressed by the developer.

Urban design and integration

21. With regard to urban design and integration with existing urban areas, David Hattam, Senior Urban Designer at the Council has reviewed the information provided and noted:
 - 21.1. The provisions of the Residential New Neighbourhood Zone (RNN) are well suited to greenfield development, having been successful in providing for connectivity and a generally good standard of amenity and liveability in new subdivisions. Conditions enabling development in accordance with these provisions would likely be supported by CCC. In terms of the provisions applying within the RNN, the draft and tentative scheme plan demonstrates:
 - 21.1.1. There are a range of lot sizes to provide for housing choice;
 - 21.1.2. There is a connected movement network with small block sizes and good connections and walkability;
 - 21.1.3. There is not an over-reliance on rear sections and rights of way for access;
 - 21.1.4. The proposal does comply with the requirement for an 800m walkable block size.
 - 21.2. The proposal includes land for commercial use (approx. 1000m²) on Candy's Road. This would provide small scale local facilities for the subdivision and also any further development across the road (and would also benefit from passing trade as Candys Road leads to SH75). It would have a walkable catchment within the subdivision and the wider area (which lacks much in the way of retail). This change of use appears to be appropriate.
 - 21.3. A weakness of the scheme (or missing information) is that we do not know if there is to be a bridge over the stream. A pedestrian connection across the river within the main reserve would be beneficial and would complete the 800m walkable grid into Selwyn.
 - 21.4. In terms of the matters listed under 8.8.9:

- 21.4.1. Integration, Context and Placemaking: Integration with the streams is the most obvious issue. Houses are to back onto the stream on both sides, except at the park. This means there will be transparent fencing close to paths people walk near to, which is an awkward interface because it compromises privacy for residents, but it needed to avoid creating an unobserved space where antisocial behaviour can occur. Knights Stream and Nottingham Stream is part of a recreation network (identified in the South West Area Plan) and provides a useful and high amenity pathway, for instance between Knights Stream and Halswell Quarry Park. It would be an improvement for some of the river to be open to the street on one side, to create a safer and more accessible network. This would require re-arranging the streets on the proposal and may lead to an increased use of rear lots as a quid-pro-quo.
- 21.4.2. Subdivision Design: There would be a diversity of housing provided for although no comprehensive housing. It would be worth considering some alternative typologies (eg duplex lots) as these are popular elsewhere in Halswell. Corner sites are not really emphasised. There is more higher-density at the east of the site than elsewhere, which makes sense because it is accessible. There is overall a high level of amenity which will complement higher density, and these may help support the proposed retail and be somewhat handy for public transport which would be expected on Candy's Road or Sabys Road.
- 21.4.3. Movement Networks: Note my comments on the accessibility of the river walkways. Otherwise the streets are very narrow (12.5m) which is not usually wide enough to provide for a carriageway, parking, footpaths, trees etc. Whilst this may be acceptable for some streets, it is not appropriate as a more widespread network. In particular it is unlikely to provide for footpaths on both sides or for many trees. The central spine road would act as a local collector and is only 14m which is not enough for this purpose.
- 21.4.4. Public Spaces: there is a good variety of spaces (river, stormwater and parks).
- 21.5. The proposal could meet some of the outcomes anticipated by the District Plan within the RNN. This includes the provision of a small commercial centre (from a design perspective). In many ways the proposal is well designed, with a connected road network and a variety of lot sizes. This indicates that a development of this type could be appropriate here. However, there are two fundamental concerns with the layout proposed:
 - 21.5.1. The waterways do not have enough prominence and oversight because houses back onto them throughout.
 - 21.5.2. The streets are too narrow.
- 21.6. Addressing these concerns will likely require a redesign of the scheme.

Reserves and open space

- 22. With regard to the provision of parks and open space in new residential subdivisions generally, Peter Barnes, Senior Parks and Policy Planner at the Council has noted:
 - 22.1. The Council has committed to parks provision through the Parks Activity Plan, Public Open Space Strategy 2010 and District Plan ODPs.
 - 22.2. The Council vision is to provide, develop and maintain a publicly accessible network of open space. The Parks Activity Plan and POSS provides Open Space guidelines and Levels of Service. These are important so the Council provides a consistent network of parks city wide, for the community to utilise and enjoy.
 - 22.3. Neighbourhood Parks (of 3000m² or greater) (but not a stormwater reserve) provide a range of opportunities for the community, including open space, green landscapes, meeting places, children's play space and passive recreation. If an adequate number of Neighbourhood Parks are not provided, the community will have to travel significant distances to visit parks in other areas.
 - 22.4. Public open space is becoming increasingly important to support community wellbeing as private open space shrinks.
 - 22.5. The Parks Activity Plan states the Level of Service for Neighbourhood Parks (or indeed other parks, except for Utility Reserves) is a 3000m² park located within 500m of 80% of residential lots. In addition, Neighbourhood Parks are provided in urban areas at a rate of at least 1.9ha/1000 population.
- 23. More specifically, with regard to the provision of reserves within the Site, Mr Barnes has noted:

23.1. "Reserve 2236m²" is a small reserve, and the site will not be able to provide meaningful open space provision for the surrounding residential area. This reserve should be boosted to 3000m², or greater.

23.2. Significant 'Riparian Margins' are proposed. These can be assets to the community, providing recreation and access to the water, and protect ecological habitat. They can also be extremely costly to establish and maintain.

Funding of infrastructure upgrades and connections to CCC infrastructure

24. Out of sequence development undermines the strategic and phased approach to planning and creates inefficiencies in infrastructure delivery by diverting funding from planned development. This proposal represents such out-of-sequence development. CCC's position is that infrastructure planning and investment needs to occur at a broader scale to achieve efficiencies and effectiveness of infrastructure provision. As this planning has not yet been undertaken for this area, any development at this stage would be ad hoc and may lock CCC into less optimal infrastructure outcomes.
25. In the case of this development, infrastructure upgrades will be required to enable the development to connect to the wider urban network, particularly in relation to wastewater services. Beyond the capital investment needed to upgrade this infrastructure, ongoing operational expenses will be required for maintenance and service delivery. These costs will largely be borne by the CCC.
26. The current Long-Term Plan makes no provision for either capital or operational expenditure in this area, and these costs are not reflected in the development contributions currently levied. Any decision by CCC to amend these plans to provide infrastructure for this development would require reprioritisation, potentially displacing planned investment in other areas of Christchurch.
27. As the infrastructure required to provide capacity to service this development is not in the current Long-Term Plan or Development Contributions Policy, the CCC has no funding available to provide the infrastructure upgrades. Greenfield development impacts downstream capacity in the wastewater network, if this development was aligned with CCC's area planning, the developer would be required to fund to their share of the cost to provide the infrastructure upgrades with the rest spread over a wider area which the CCC would then recover via development contributions.
28. To address this funding gap identified, the Applicant will need to demonstrate how the upgrades to infrastructure can be achieved such that the development can be appropriately serviced, including both the connections to outfalls and downstream infrastructure where capacity is constraint. If unresolved and unfunded, CCC may refuse (under CCC bylaws²) any request for infrastructure connections until adequate capacity exists.

Benefits

29. The whether the development will have national or regional benefits is not clear, nor is the extent of any such benefit. The quantification of benefits should consider:
 - 29.1. Whether any economic activity is generated by the development, or represents a transfer of economic activity that would occur elsewhere, either within the region or nationally;
 - 29.2. Any reduction in available downstream infrastructure capacity for zoned land elsewhere in the District, including that enabled by Plan Change 14, enabling greater intensification of existing residential zoned land.

Conclusion

30. It is recommended that the proponent consider and respond to these matters identified above in any referral application. Pre-application meeting processes are available should further input from CCC be sought prior to the referral application being lodged, subject to staff availability.

Francis White
Senior Planner

² In particular, the **Water Supply and Wastewater Bylaw 2022** and **Stormwater and Land Drainage Bylaw 2022**.

Authorised by:

A handwritten signature in blue ink, appearing to be 'PL' or 'P. Lowe', written in a cursive style.

Paul Lowe
Manager Resource Consents

Appendix 1 – Information provided with notification

From: Kerstin Ghisel s 9(2)(a)
Sent: Wednesday, 15 April 2026 4:06 pm
To: Resource Consent applications; Lightbody, Kirk; Ward, Sean
Subject: Sabys 101 Limited and lodgement of a Referral Application
Attachments: SabysCandyBlock_Lot_Plans_24.03.2026.pdf

Hello,

Sabys 101 Limited wishes to formally notify the Christchurch City Council that Sabys 101 Limited will be lodging a referral application under the Fast-track Approvals Act 2024 ("FTAA") for the Franco Farms development ("the Project"). The Project will establish:

- approximately 348 residential lots and associated residential units.
- A neighbourhood centre (approximately 2,115m²) to provide for the future resident's day to day needs located adjacent to Sabys Road.
- A new reserve and enhanced riparian margin adjacent to Knights Stream, the Halswell River and the Creamery Drain.
- The proposal incorporates an integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve (approximately 2,236m²) and stormwater basins with associated wetland areas (approximately 5.6ha) to the south of the application site.
- Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure.

Sabys 101 considers that the Project is a development project that would have significant regional benefits, and that referring the project into the FTAA regime will facilitate the project and is unlikely to materially affect the efficient operation of the approvals process, and is clearly aligned with section 22(1) of the FTAA.

As you are aware, Sabys 101 Limited has already commenced consultation with Christchurch City Council for this Project, including attending meetings with council staff in December 2025 and February 2026 to discuss the proposal, along with various email correspondence. We thank you for your time in participating in these sessions

Approvals

A referral application must specify all the approvals that are proposed to be applied for under the fast-track approvals process under the FTAA. The following approvals will be required:

- Schedule 5 approvals relating to the Resource Management Act 1991 ("the RMA"); and
- Schedule 7 approvals relating to the Wildlife Act 1953 ("Wildlife Act")
- Schedule 8 approvals relating to Heritage New Zealand Pouhere Taonga Act 2014 ("HNZ Act")

Of particular relevance to Christchurch City Council are the approvals required under the FTAA that would otherwise be required under the RMA.

The FTAA as amended on 31 March 2026 requires the following prior to lodging a referral application with the EPA:

- Consultation requirements in section 11(1)(a), which are not relevant to the Project; and
- Written notification to (relevantly) the relevant local authorities, any relevant iwi authorities, hapū, and Treaty settlement entities, and the relevant administering agencies.

In accordance with section 11 of the FTAA, Sabys 101 Limited gives notice that it intends to lodge a referral application for the Project. It will not file its referral application for 20 working days following the date of this email in order to provide the Christchurch City Council the opportunity to respond to this notice.

Project description

The Project is located at Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573) and 6 Wroots Road. I attach a current (draft and tentative) scheme plan in order to give you a better understanding of the Project details.

If you have any questions, please get in touch, and I look forward to hearing from you in respect of this notice.

Thanks,
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate
s 9(2)(a)



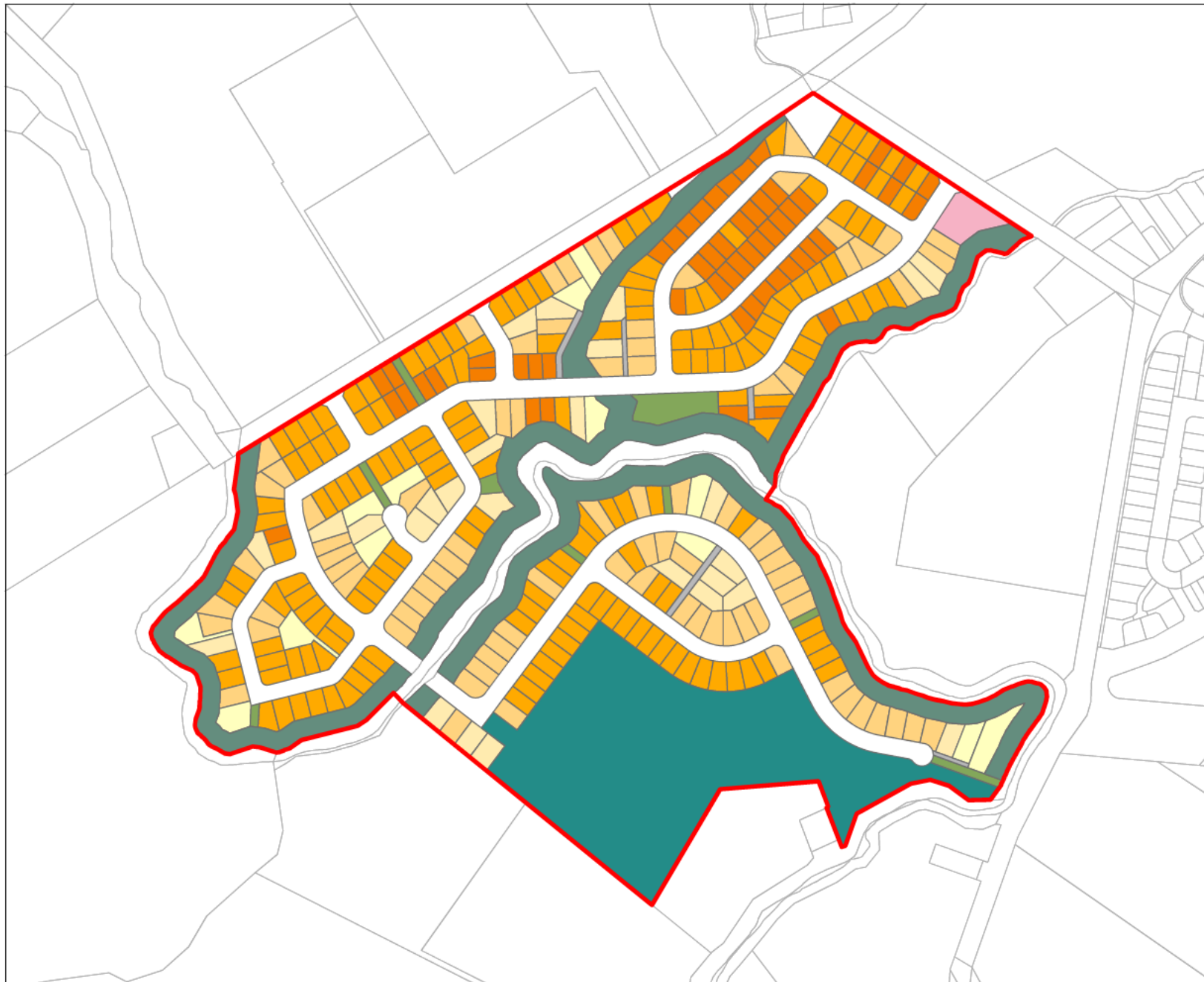
PO Box 1749,
Christchurch 8140
Level 3, 61 Cambridge
Terrace,
Christchurch Central
City, Christchurch
8013

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Legend

- SiteBoundary
- LINZ NZ Primary Parcels
- NeighbourhoodCentre
- Public Open Space
- Riparian Margins
- Stormwater Management
- Right of Way
- <400m²
- 400-500m²
- 500-600m²
- 600-700m²
- >700m²

Client: Franco Farms Limited
Job Number: 026458

Drawing: Lot Area Plan
Version: Draft
Date: 24/03/2026

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Sheet: 1 of 8



Candys & Sabys Block
Halswell, Christchurch

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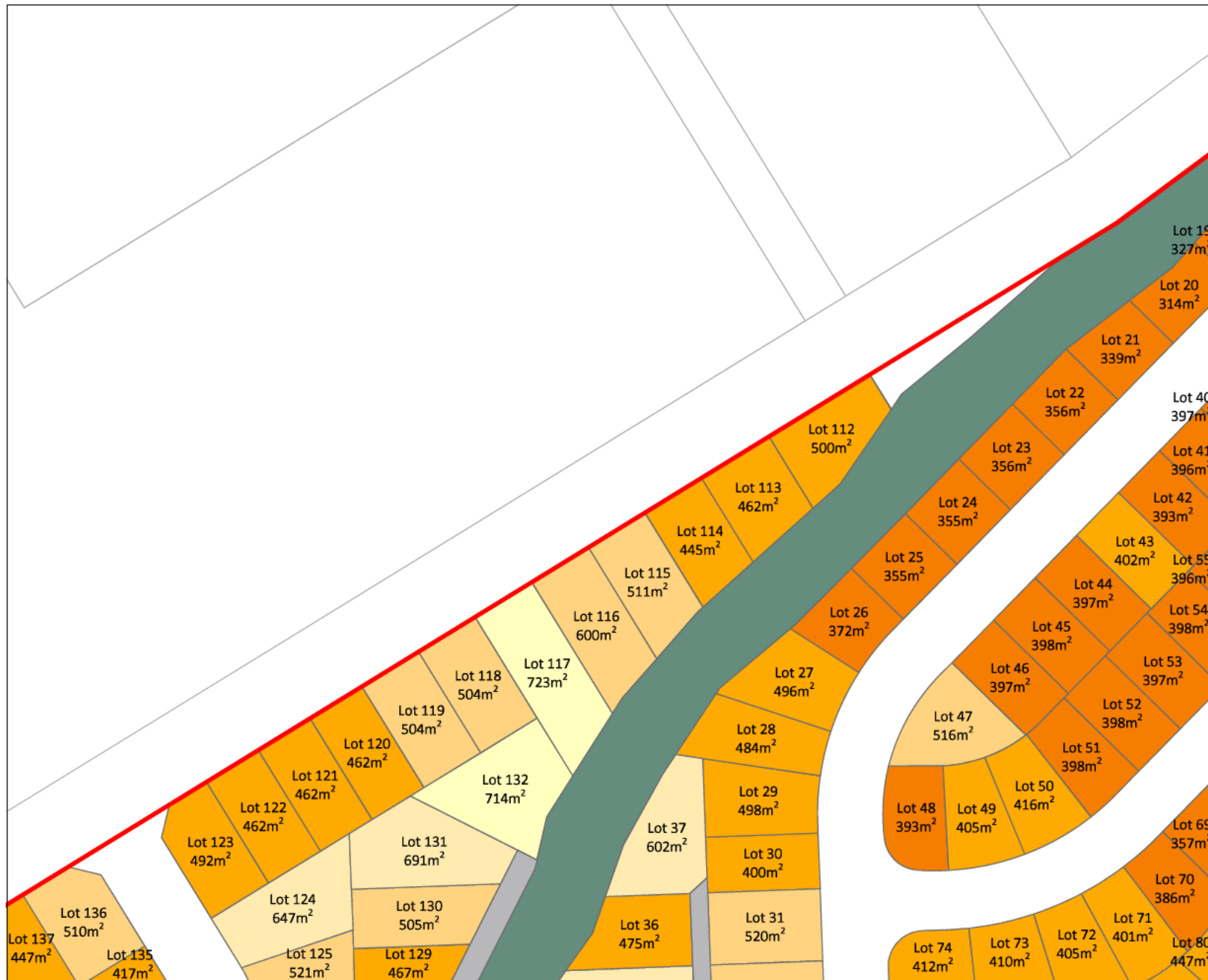
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Sheet: 2 of 8



Candys & Sabys Block

Halswell, Christchurch

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Sheet: 3 of 8



Candys & Sabys Block
Halswell, Christchurch

B&A
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Sheet: 4 of 8



Candys & Sabys Block
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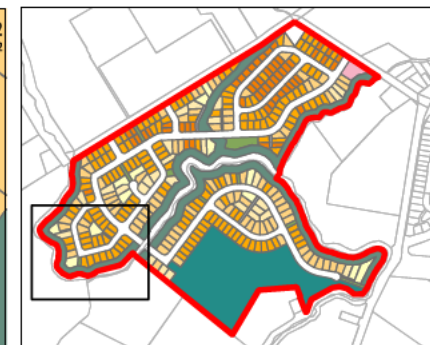
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Candys & Sabys Block

Halswell, Christchurch

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Scale: 1:1,000 @ A3
Sheet: 6 of 8



Candys & Sabys Block
Halswell, Christchurch

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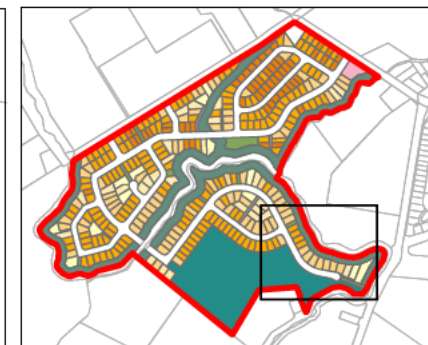
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Candys & Sabys Block
Halswell, Christchurch

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Sheet: 8 of 8



Candys & Sabys Block
Halswell, Christchurch

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Sabys 101 Limited and lodgement of a Referral Application

From Kerstin Ghisel s 9(2)(a)

Date Wed 2026-04-15 4:05 PM

To resourceconsentapplications@ccc.govt.nz <resourceconsentapplications@ccc.govt.nz>; Lightbody, Kirk s 9(2)(a)
Ward, Sean s 9(2)(a)

📎 1 attachment (3 MB)

SabysCandyBlock_Lot_Plans_24.03.2026.pdf;

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If you have any questions, please get in touch, and I look forward to hearing from you in respect of this notice.
Thanks,
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate
s 9(2)(a)

B&A
Urban & Environmental



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Minutes

Project: Franco Farms Fast Track

Date: 4 February 2026

Time: 10am

Location: CCC

Name	Role/Organisation
Brian Norton	CCC
Sean Ward	CCC
Kirk Lightbody	CCC
Kerstin Ghisel	Barker & Associates
Ruth Evan	Barker & Associates
Andy Hall	DLS

Item	Detail	Action
1	Discuss stormwater management, wetland design/operation, flooding considerations, consenting (incl. fast-track/global consents), and related infrastructure constraints across the JP Drive and Sabys/Candys/Wroots areas.	
2	Consenting / fast-track / vesting - Fast-track / global consents discussed; expectation is these should be workable. - Ponds are intended to vest as reserves to Christchurch City Council (CCC).	
3	Nottingham Stream interception / siphon concept - Option discussed to intercept Nottingham Stream within the middle block and siphon stormwater down to a pond. - Alternative methods noted: - Brian referenced pumping in other areas (Addington/Riccarton). - Andy preference is gravity where feasible. - Brian noted a possible upstream opportunity on Nichols Road for a larger facility, which may reduce the need/viability for the Nottingham Stream option. - Global consent context: - Global consent covers stormwater generated from the city. - A different consent would be required for Wroots Road stormwater.	

Barker & Associates

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	• Concept questions raised: ◦ How stormwater would physically get to the pond (Andy: siphon). ◦ Whether the economics stack up. ◦ General feasibility depends on pond sizing and the ability to convey water hydraulically. ◦ Location of pond (Candys vs Wroots) is less important than whether the system works hydraulically.	
4	Halswell trenching / overpumping • Question raised: overpump Halswell while trenching, or push through. • Noted springs and complexity. • Similar works have been done previously but with very high cost. • Flood detention adjacent to the river was considered but ruled out due to low ground levels.	
5	Groundwater sensitivity • Brian is sensitive to groundwater takes.	
6	Wastewater and transport constraints • Wastewater model is critical; noted that the model looks ~100 years ahead. • Transport is a significant issue for fast-track applications: ◦ Lack of roads and no planned upgrades is leading to pushback to applicants. • Sean's team is willing to review draft reports and related material.	
7	Plan changes • Plan changes noted as a relevant consideration (Kirk).	
8	Actions / next steps • DLS (Andy) to: ◦ Provide proof-of-concept for stormwater conveyance (incl. siphon concept) and how water would move from one side to the other. • Brian to: ◦ Consider the Nottingham Stream option further and discuss internally/with others to test appetite and feasibility. • Barker & Associates to: ◦ Coordinate receipt/review of draft reports (Sean's team available to review).	

Project: Candys/Sabys Fast-Track Referral

Date: 16 December 2025

Time: 10-11am

Location: Christchurch City Council / Teams

Attendees: Kirk Lightbody (CCC - planning), Sarah Oliver (CCC - planning), Peter Rogers (CCC - transport), Chen (CCC – transport), Andy Milne (CCC – transport), Michelle (CCC – wastewater), Kevin McDonnell (CCC – stormwater) Todd Inness (DLS (via Teams)), Kerstin Ghisel (B&A)

Infrastructure

- Servicing a key area.

Water

- Water supply – water main around the area.
- Orange light for water.
- 300 lots plus 101 Sabys = 500 lots.
- Springs in the area – need to be surveyed. Protecting the spring heads if there are any will take up a bit of developable land – Iwi don't want mixing of water.

Wastewater

- Wastewater – only sized to service the zones area and not any rural land. WW will need to be upgraded. Red light for WW.
- Pump station 60 and no room to upgrade – rising main size and change its location. Need to find another route for capacity.
- 7l/s SDC charge of wastewater. Long term agreement with SDC and now no end date. No capacity from Tai Tapu.
- Updating model with infill projections – will make capacity constraints upgrade.

Stormwater

- First flush and detention and wetland for SW detention for Nottingham Stream. S/w treatment will be enlarged to cater for wider catchment.
- Second flow across the Halswell River – or split s/w approach. Working through this.

Planning

- Urban edge – there is a working programme between SDC and CCC but out proposal would be working ahead of any future planned infrastructure.
- Area plans would be next step. 1 year – 18 months, depending on RM reforms.
- Spatial plan and identifying major infrastructure - 2027 proposal spatial plan but again depending on RM reforms.

Transport

- Connection to Sabys/Candys/Halswell and over Halswell River.
- CAST model – recommend that Abley use this. Being updated with growth projections – ready in March 2023.
- Candys block would be considered a stage of a wider area.
- Upgrade existing bridge – SDC, narrow bridge – it was replaced after the EQ but only like-for-like and not upgraded.
- NZTA consultation due to SH near the site.
- Public / cycle / walking routes would need to be considered.
- Footbridge over the waterways.
- Road cross sections.
- Wider area – Sabys Road could be re-directed in the future when looking at developing wider area, especially due to the sharp corner between Sabys/Trices
- Would recommend having discussions with Andrew Mazy, SDC.
- Sarah Oliver said that it is through the subdivision where you sort out infrastructure constraints – this would be relevant if we went with a PPC.

Overall, CCC planners prefer a PPC/or joining in with their future area plan. They weren't very keen on the FF option.

New Zealand Transport Agency (NZTA)

B&A

Urban & Environmental

Minutes

Project: Sabys/Candys – NZTA Discussion

Date: **23 March 2026**

Time: 10:00 – 11:00am

Location: Level 1, BNZ Centre, 120 Hereford Street

Attendees:

Name	Role/Organisation
Ian Thompson	DMR
Brent Trumper	DMR
Dave Smith	Abley
Kerstin Ghisel	B&A
Maisie Fisher	B&A
Brynlea Stocks	NZTA
James Long	NZTA
Sagar Pandey	NZTA

Item	Detail	Action
1	Introductions and project overview – KG • Half CCC and SDC land • Adjoining residential subdivision completed by DMR • Knights Stream, walking/cycling connections • Roading connections onto Sabys and Candys • One pedestrian/cycling bridge over Halswell River and another road	
2	DS: • Investigated connections to Halswell Rd but not achievable from a site lines perspective • No formal traffic investigations complete as of yet but have reviewed the traffic models from QTP and will undertake further detailed modelling following the acceptance of the referral application.	
3	Timeframes – lodgement expected end of April	
4	NZTA: • No immediate concerns from NZTA from a planning perspective. Main questions from a planning perspective	James highlighted the need for assessments and modelling for direction of

	relate to the Halswell/Candys intersection – KG/IT note the controlled round-about here. - James Long - The roundabouts and roading conditions have been designed to the existing urban growth north of the site and not the proposed development. So, this will need to be considered and modelled accordingly. DS confirmed this modelling will take place. - Ian confirmed consenting requirements for northern subdivisions is to provide controlled round-about at the Sandys/Candys intersection that will be undertake. - Trice's road upgrades will be investigated against demands. - Sparks Road traffic lights. - Public transport - Bus 100 route to be considered and taken into account. Frontage upgrades and roundabout will mean that roads are designed to be satisfactory from a public transport perspective. - KG noted discussions with CCC have identified this area as being the remaining urban growth area.	traffic and peak traffic flow demands.
5	Consider potential flooding from the SW reserve onto the SH. Also noting that pedestrians from the reserve will not be directed onto the state highway via that pedestrian link identified on the scheme plan.	Consideration of flooding onto SH from SW reserve.
6	Reverse sensitivity SH traffic noise onto residential properties. Internal acoustic requirements. 100m setback requirement from SH but you can comply if you meet the internal acoustic requirements. Can mirror the rules in the CDP to manage this as SDC don't have this condition.	Can be handled through a consent condition through the substantive.
7	Additional comments: KG asked whether NZTA have concerns regarding the neighbourhood centre. James concerned there is nothing specific from them.	
8	ITA will be prepared as part of the substantive. Draft to be shared to NZTA to provide comments.	Brynlee will be the contact the whole way through so if it goes through to the substantive then we can remain in touch.

**Re: Sabys 101 Limited and lodgement of a Referral Application Application-2026-0021
CRM:0341000535**

From Kerstin Ghisel s 9(2)(a)
Date Tue 2026-04-28 12:25 PM
To Brynlea Stocks s 9(2)(a)

Hi Brynlea

Im still finalising the draft referral application but hope to email it to you shortly.

Thanks
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate
s 9(2)(a)



barker.co.nz



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From: Brynlea Stocks s 9(2)(a)
Sent: 28 April 2026 12:15 PM
To: Kerstin Ghisel s 9(2)(a)
Subject: RE: Sabys 101 Limited and lodgement of a Referral Application Application-2026-0021
CRM:0341000535

Hi Kerstin,

Thank you for confirming that. Can you please provide a copy of the draft referral application for NZTA to review?

Thanks,

Brynlea Stocks (she/her)

Intermediate Planner – Environmental Planning (South)
Poutiaki Taiao | Environmental Planning

Email: s 9(2)(a)
Phone

Mobile: s 9(2)(a)

NZ Transport Agency Waka Kotahi

Christchurch, Level 1, BNZ Centre, 120 Hereford Street
PO Box 1479, Christchurch 8011, New Zealand

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www.nzta.govt.nz

From: Kerstin Ghisel s 9(2)(a)
Sent: Wednesday, 22 April 2026 4:02 pm
To: Brynlea Stocks s 9(2)(a)
Subject: Re: Sabys 101 Limited and lodgement of a Referral Application Application-2026-0021
CRM:0341000535

Hello Brynlea.

Thank you for your email.

In relation to the transport assessment, the detailed assessment of the impacts on the intersections of Candys Road/SH75 and Sabys Road/SH75 (as discussed at the meeting on 23 March) will be undertaken as part of the substantive application stage.

Once this work has been completed, the applicant would be keen to meet with NZTA to discuss the findings and any matters arising.

Thanks

Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate
s 9(2)(a)

barker.co.nz



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From: Brynlea Stocks s 9(2)(a)
Sent: 22 April 2026 3:03 PM
To: Kerstin Ghisel s 9(2)(a)
Subject: RE: Sabys 101 Limited and lodgement of a Referral Application Application-2026-0021
CRM:0341000535

Hi Kerstin,

Thank you for providing notification that the referral application is to be submitted soon.

Can you please provide a copy of the draft referral application for NZTA to review? Has an assessment of the impact of the development on the interstation's of Candys Road/SH75 and Sabys Road/SH75, as discussed at the meeting on the 23rd of March, been completed? If so, can you please provide a copy of those for NZTA to review as well.

Thanks,

Brynlea Stocks (she/her)

Intermediate Planner – Environmental Planning (South)

Poutiaki Taiao | Environmental Planning

Email: s 9(2)(a)

Phone

Mobile

NZ Transport Agency Waka Kotahi

Christchurch, Level 1, BNZ Centre, 120 Hereford Street
PO Box 1479, Christchurch 8011, New Zealand

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From: Kerstin Ghisel s 9(2)(a)
Sent: Wednesday, 15 April 2026 4:19 pm
To: Brynlea Stocks s 9(2)(a)
Subject: Sabys 101 Limited and lodgement of a Referral Application

Hello Brynlea

Sabys 101 Limited wishes to formally notify the New Zealand Transport Agency that Sabys 101 Limited will be lodging a referral application under the Fast-track Approvals Act 2024 ("FTAA") for the Franco Farms development ("the Project"). The Project will establish:

- approximately 348 residential lots and associated residential units.
- A neighbourhood centre (approximately 2,115m²) to provide for the future resident's day to day needs located adjacent to Sabys Road.
- A new reserve and enhanced riparian margin adjacent to Knights Stream, the Halswell River and the Creamery Drain.
- The proposal incorporates an integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve (approximately 2,236m²) and stormwater basins with associated wetland areas (approximately 5.6ha) to the south of the application site.
- Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure.

Sabys 101 considers that the Project is a development project that would have significant regional benefits, and that referring the project into the FTAA regime will facilitate the project and is unlikely to

materially affect the efficient operation of the approvals process, and is clearly aligned with section 22(1) of the FTAA.

As you are aware, Sabys 101 Limited has already commenced consultation with New Zealand Transport Agency for this Project, including attending a meeting held recently on 23 March to discuss the proposal, along with various email correspondence. We thank you for your time in participating in these sessions and for the feedback.

Approvals

A referral application must specify all the approvals that are proposed to be applied for under the fast-track approvals process under the FTAA. The following approvals will be required:

- Schedule 5 approvals relating to the Resource Management Act 1991 ("the RMA"); and
- Schedule 7 approvals relating to the Wildlife Act 1953 ("Wildlife Act")
- Schedule 8 approvals relating to Heritage New Zealand Pouhere Taonga Act 2014 ("HNZ Act")

The FTAA as amended on 31 March 2026 requires the following prior to lodging a referral application with the EPA:

- Consultation requirements in section 11(1)(a), which are not relevant to the Project; and
- Written notification to (relevantly) the relevant local authorities, any relevant iwi authorities, hapū, and Treaty settlement entities, and the relevant administering agencies.

In accordance with section 11 of the FTAA, Sabys 101 Limited gives notice that it intends to lodge a referral application for the Project. It will not file its referral application for 20 working days following the date of this email in order to provide the New Zealand Transport Agency the opportunity to respond to this notice.

Project description

The Project is located at Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573) and 6 Wroots Road. I **attach** a current (draft and tentative) scheme plan in order to give you a better understanding of the Project details.

If you have any questions, please get in touch, and I look forward to hearing from you in respect of this notice.

Thanks,
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate
s 9(2)(a)

PO Box 1749,
Christchurch 8140
Level 3, 61 Cambridge
Terrace,
Christchurch Central
City, Christchurch
8013

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RE: Sabys 101 Limited and lodgement of a Referral Application

From Brynlea Stocks s 9(2)(a)

Date Tue 2026-05-12 4:36 PM

To Kerstin Ghisel s 9(2)(a)

Hi Kirstin,

Thank you for providing notice that Sabys 101 Limited intend to lodge a referral application for the proposed residential development located at 9 Candys Road, Halswell.

As a part of this notice, NZTA have not had a chance to review a copy of the referral application. NZTA was provided a copy of a High-level traffic and transport assessment dated the 30th of April 2026, in which NZTA is supportive of the recommendations in the memo, and that an ITA should be prepared at the next stage of the application. Given the location of the site, and likely destinations from future residents will be Christchurch city centre, it is expected that the ITA would consider the effects of the development on the intersections of State Highway 75 and Candys Road and State Highway 75 and Sparks Road as these are key nodes in that journey, as well as further afield to the east and north.

NZTA requests that the panel provide a copy of the FTAA referral application to NZTA and the opportunity to provide comments, once the applications has been lodged.

Thanks,

Brynlea Stocks (she/her)

Intermediate Planner – Environmental Planning (South)

Poutiaki Taiao | Environmental Planning

Email: s 9(2)(a)

Phone: s 9(2)(a)

Mobile: s 9(2)(a)

NZ Transport Agency Waka Kotahi

Christchurch, Level 1, BNZ Centre, 120 Hereford Street

From: Kerstin Ghisel s 9(2)(a)
Sent: Wednesday, 15 April 2026 4:19 pm
To: Brynlea Stocks s 9(2)(a)
Subject: Sabys 101 Limited and lodgement of a Referral Application

Hello Brynlea

Sabys 101 Limited wishes to formally notify the New Zealand Transport Agency that Sabys 101 Limited will be lodging a referral application under the Fast-track Approvals Act 2024 ("FTAA") for the Franco Farms development ("the Project"). The Project will establish:

- approximately 348 residential lots and associated residential units.
- A neighbourhood centre (approximately 2,115m²) to provide for the future resident's day to day needs located adjacent to Sabys Road.
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Sabys 101 considers that the Project is a development project that would have significant regional benefits, and that referring the project into the FTAA regime will facilitate the project and is unlikely to materially affect the efficient operation of the approvals process, and is clearly aligned with section 22(1) of the FTAA.

As you are aware, Sabys 101 Limited has already commenced consultation with New Zealand Transport Agency for this Project, including attending a meeting held recently on 23 March to discuss the proposal, along with various email correspondence. We thank you for your time in participating in these sessions and for the feedback.

Approvals

A referral application must specify all the approvals that are proposed to be applied for under the fast-track approvals process under the FTAA. The following approvals will be required:

- Schedule 5 approvals relating to the Resource Management Act 1991 ("the RMA"); and
- Schedule 7 approvals relating to the Wildlife Act 1953 ("Wildlife Act")
- Schedule 8 approvals relating to Heritage New Zealand Pouhere Taonga Act 2014 ("HNZ Act")

The FTAA as amended on 31 March 2026 requires the following prior to lodging a referral application with the FPA:

- Consultation requirements in section 11(1)(a), which are not relevant to the Project; and
- Written notification to (relevantly) the relevant local authorities, any relevant iwi authorities, hapū, and Treaty settlement entities, and the relevant administering agencies.

In accordance with section 11 of the FTAA, Sabys 101 Limited gives notice that it intends to lodge a referral application for the Project. It will not file its referral application for 20 working days following the date of this email in order to provide the New Zealand Transport Agency the opportunity to respond to this notice.

Project description

The Project is located at Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573) and 6 Wroots Road. I **attach** a current (draft and tentative) scheme plan in order to give you a better understanding of the Project details.

If you have any questions, please get in touch, and I look forward to hearing from you in respect of this notice.

Thanks,
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate
s 9(2)(a)

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Department of Conservation

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Request for Fast-track Pre-lodgement Consultation

Purpose – To request pre-lodgement consultation on fast-track referral or substantive applications as required by the Fast-track Approvals Act 2024.

Instructions:

Please Email the completed form to fasttrackapplicationenquiries@doc.govt.nz

NOTE: DOC will recover the actual and reasonable costs incurred in consulting and assisting you before the application is lodged (whether or not the application is subsequently lodged).

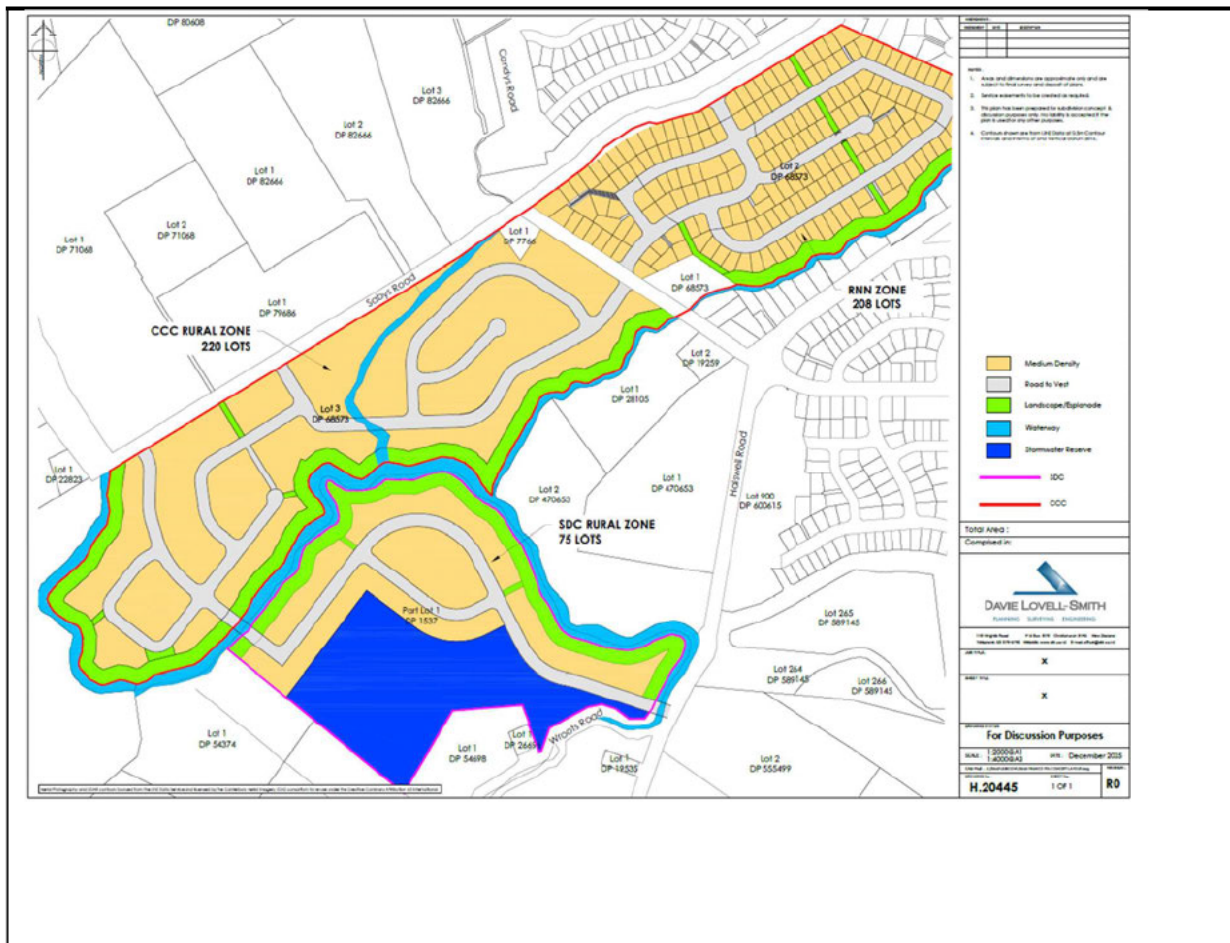
Project Details

Your name: Ruth Evans	Your role & company: Planner, Barker & Associates <i>(If you are a consultant acting on behalf of the applicant, please include your role and company name)</i>
Phone number: s 9(2)(a)	Email: s 9(2)(a)
*Fast-track applicant's name (Company Name and Trading Name (if different)): Danne Mora Holdings Ltd	
*Project name and summary: Sabys / Candys Fast-Track. A proposed development of approximately 500 residential lots including associated earthworks and infrastructure (roading, stormwater, etc).	
*Project site location and the location of proposed activities within the site (where appropriate): 101 Sabys Road, Lot 2-3 Deposited Plan 68573 and 6 Wroots Road. Indicative/working draft masterplan snipped below. Please note this a working draft and currently subject to refinement. We will share an updated draft once it is ready.	

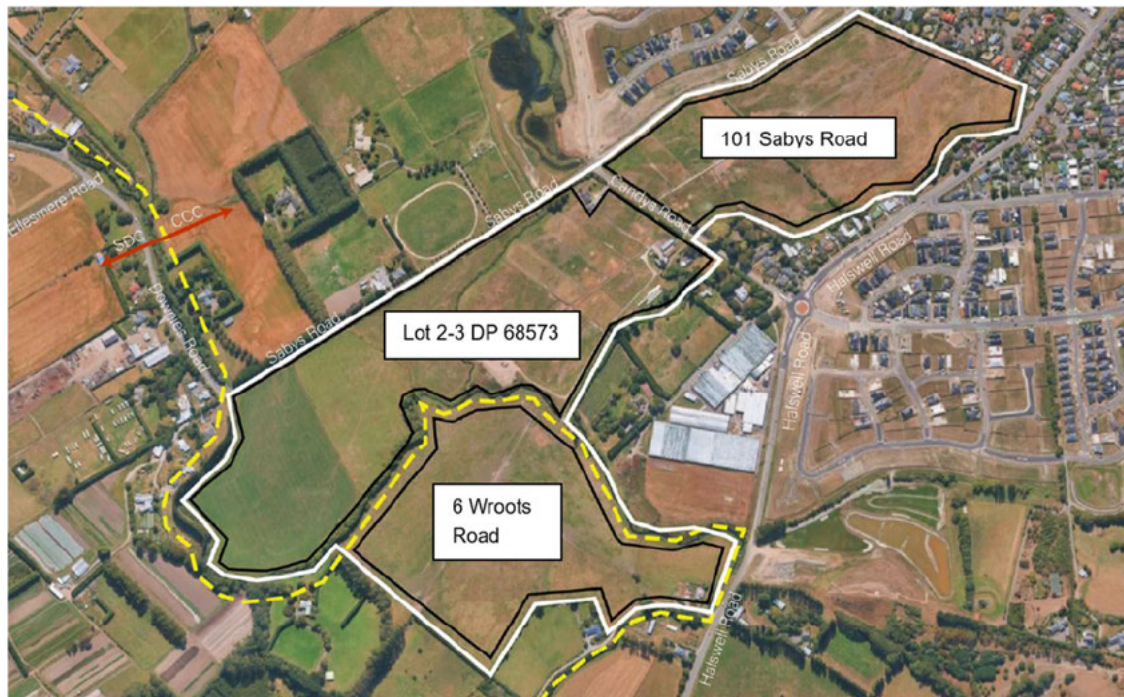


Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government



GPS location and/or map:



Is the project on Public Conservation Land? No	
*Type of Fast-track Application (referral or substantive). If the substantive application is for a project listed in Schedule 2, please specify. Referral	
Applicant Phone number: s 9(2)(a)	Applicant email: s 9(2)(a)
Details of the proposed activity: Please provide supporting information to help understand the proposal, including identification of any duplications of permissions either active or applied for, clear identification of the locations of the proposed activities which relate to the approval(s) sought and any draft application documents, reports and plans. We anticipate that a Wildlife Act Authority will be required due to the likely presence of lizards on the site. A site survey is planned and more information will be shared with the Department of Conservation once this has been completed.	
Details of any relevant Treaty of Waitangi settlement obligations you are aware of and any engagement you have undertaken with local iwi/hapū: Engagement with iwi is planned to start this month.	
What conservation approvals do you think may be required for the activity?	
• Concessions under the Conservation Act 1987 ☐ Reserves Act 1977 ☐ Wildlife Act 1953 ☐ and National Parks Act 1980	
• Authorities provided under the Wildlife Act 1953 (including the identification of the proposed activity eg relocation, salvage, capture etc and the species affected)	x
• Specific permissions under the Freshwater Fisheries Regulations 1983	
• Access arrangements under the Crown Minerals Act 1991	
• Exchanges of land under the Conservation Act 1987 or Reserves Act 1977	
• Amending or revoking conservation covenants under section 27 of the Conservation Act 1987 or section 77 of the Reserves Act 1977	
• Other (please specify)	
What current interests over the land are you aware of? N/a	
Is there any other additional information that may be relevant? (e.g. is the activity in a World Heritage Area?)	

N/a
Date initially planning to lodge (subject to pre-lodgement consultation discussions): February 2026

Disclaimers:

- The purpose of collecting this information is to enable the Department to respond to your request for pre-lodgement consultation and your application if one is subsequently lodged. The Department will not use this information for any reason not related to that purpose.
- DOC works with others to achieve its conservation goals and has a responsibility to give effect to the principles of the Treaty of Waitangi in doing so. As part of that, we may share some of the high-level information you provide above (marked with a *), as well as a summary of our response to you, with our Treaty partners, conservation boards, and the New Zealand Conservation Authority. DOC will not carry out any of your required consultation with these groups on your behalf, nor will we represent their views or the views of others in our pre-lodgement consultation with you. However, if interests are identified early on, this can help support our advice to you.
- However, if any interests are identified early, this can help support DOC's advice to you in the early steps of this application.
- Applicants should be aware that provisions of the Official Information Act may require that some or all information provided to DOC be publicly released.

Meeting notes

Project: Candys/Sabys Fast-Track Referral
Date: 3 March 2026
Time: 1130am
Location: Teams
Attendees: Shawn Gardner (DOC), Kerstin Ghisel (B&A), Ruth Evans (B&A)

- Fast-Track provides for Wildlife Approvals to be obtained at same time as RMA approvals.
- DOC will develop pre-lodgement consultation summary, including what DOC is interested in seeing at substantive stage.
- SG has completed an initial review. No huge red flags at this stage and nothing identified that would stop this one from being referred.
- Rivers – DOC has freshwater expert on this. The waterways on the site are particularly important freshwater resources where some At Risk and Threatened species have been identified. Will provide advice on risks from freshwater perspective that DOC is interested in.
- The site overlaps with three reserves under the Reserves Act. SG shared location of these reserves and will send maps that show them. These reserves are not managed by DOC, they are managed by CCC and ECan. Councils will need to comment on what effect the proposal will have on the reserves. Will need a s19 report at referral. DOC will consult with administering agencies when preparing these comments. It is a legal requirement for DOC to discuss the reserves at the referral stage. SG recommends talking to parks and/or land management team at each council to support the process prior to referral being lodged.
- SG considers it is very likely to need Wildlife Act Authority for lizards. At substantive stage will need to see surveys and lizard management plans. Also surveys for fish and any freshwater management plans.
- KG explained there will be a 20m setback for geotech reasons. Will need earthworks consent and possibly dewatering.
- SG – look at freshwater fisheries regulations. Better to apply at referral stage if you will/may need approval under this. Typically damming or culverting, but also potentially dewatering.
- End of month – legislation change that allows for amendments to referral to include any permits that have not be included in the original referral documents.
- SG recommends being really thorough about applying for anything you can under the Fast-Track legislation.
- RE explained that 101 Sabys is not included in the fast-track. SG requested an update scheme plan so their experts know the scope (marked up version of the current one is fine).
- SG keen to see draft ecological reports. KG will check with client then send to SG.
- RE questioned bats and if any approvals are likely in relation to bats as we understand there have been a number of bat related issues raised for Canterbury sites. SG will ask internal bat people to see if they think a bat survey is needed.
- SG confirmed we can say we think there might be bats and if there are this is what we plan to do. Can do the survey following the referral stage.

- SG confirmed there is an option to deal with Wildlife Act Approvals through BAU process. Processing time for WAA about same as fast-track consent. DOC would like to know sooner rather than later as helps allocate resources. KG and RE confirmed it is intended to include these permits in the referral but the applicant may decide to apply for the WAA separate to fast-track depending on timing, given seasonal constraints around bat and lizard surveys. SG ok with this, noting that if the proposal gets referred DOC want to be involved regardless.
- Discussed transitional arrangements moving to 20bd 'notification' approach from 31 March. SG will confirm what approach DOC is taking in regards to this.
- Timing for response – pre-lodgement consultation for simple referral fast-track applications typically takes 2-3 weeks, really complex ones 6-8 weeks. This one is a medium complexity project due to freshwater values involved. SG hopes to have response in next few weeks.
- SG recommends including pre-lodgement consultation summary with the referral application.

Fast-Track Pre-Lodgement Consultation Summary

Purpose - This document provides a summary of information from DOC following a pre-lodgement consultation request.

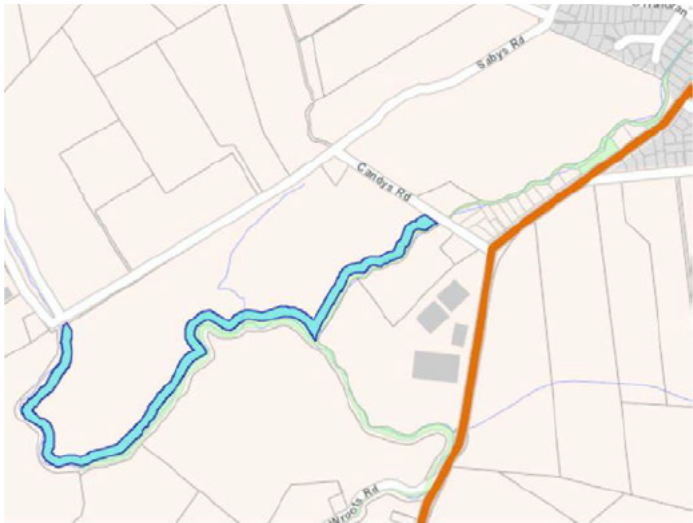
Project Details

Project name:	Saby's Road
Engagement type:	Pre-lodgement engagement for a referral application
Applicant/agent:	Applicant: 101 Saby's Limited Agent: Barker & Associates Ruth Evans: s 9(2)(a)
Proposal overview:	The project is a residential development of approximately 500 residential lots, including earthworks and associated infrastructure such as roading, water, wastewater and stormwater.
Location:	Lot 2-3 DP 68573, and 6 Wroots Road, Halswell, southwest of Christchurch - Lot 2-3 DP 68573; - Part Lot 1 Deposited Plan 1573
Date pre-lodgement request received:	Request received: 22 January 2026 Invoice paid: 16 February 2026 Pre-lodgement consultation meeting: 3 March 2026
Summary of pre-lodgement Consultation	
Fast track project lead DOC:	Shawn Gardner – Consultant Fast-track Consents Advisor (Enspire)
DOC specialist input:	Fast-track Project Lead: Shawn Gardner Statutory Planning: Hazel Farquhar-Love Freshwater Ecology: Shelley McMurtrie (EOS Ecology) Statutory Land Management: Kingsley Timpson
DOC Permissions/ Approvals Identified by applicant in pre-	The applicant is proposing to apply for authority under the Wildlife Act 1953 for lizards



Lodgement request as potentially required:	
DOC Commentary on Fast Track approvals and permissions identified: Note DOC's role in relation to specific	The applicant provided the following documents, which have informed this pre-lodgement consultation summary: • Draft Scheme Plan (provided 25 February 2026); • Draft ecological memo by Bioresarches entitled 'Candy's Road Fast Track Referral – Ecological Constraints' (provided 5 March 2026) It is the applicant's responsibility to comply with the FTAA and to ensure that the proposed approvals are identified and all the required information is provided as a part of the referral application. Section 13(4) sets out the information to be included in a referral application. Wildlife Approvals authorise acts that would otherwise be an offense under the Wildlife Act (1953), including to: • Catch and handle wildlife onsite (including wildlife sampling and wildlife salvage) • Take samples from wildlife • Take or destroy the eggs of wildlife • Attach identification bands to wildlife • Mark, tag, or attach other scientific apparatus to wildlife • Catch and temporarily hold wildlife in captivity (less than 3 months) • Transfer captive wildlife from one holding facility to another holding facility • Kill wildlife • Hunt, disturb, kill or catch alive protected wildlife that are causing damage • Translocate wildlife If any of these activities are required for protected species, then additional wildlife approvals would be required. It is noted that there are no mandatory information requirements in respect of wildlife approvals at the referral stage. Based on the information provided, there are a number of artificial and modified watercourses on the site, as well as the possibility of the presence of wetlands. The applicant has not indicated a need to obtain any freshwater fisheries approvals. The applicant should be aware of the approval requirements under the Freshwater Fisheries Regulations. The information requirements for complex freshwater fisheries approval is specified in clause 3 of Schedule 9 of the Act. This project will need to address this information requirement if complex freshwater fisheries approvals are needed.
Treaty partners:	DOC is aware of the following Treaty partners with interests that may be relevant to this site: • Ngāi Tahu

	DOC encourages the applicant to engage directly with relevant Māori groups as required by section 29 of the Act.
Treaty Settlement implications/considerations:	Ngāi Tahu Claims Settlement Act 1998 Consideration should be given to the protection of: • Freshwater fisheries; • Customary fisheries; • Historic resources; • Wetlands; • Riparian margins; • Water quality; • Indigenous vegetation; and • Taonga species The following species identified in the preliminary ecological report are also listed in the table of taonga species (attachment 12.148) of the Ngāi Tahu Claims Settlement Act 1998: • Ti rākau/Cabbage Tree/<i>Cordyline australis</i> • Kāhu/Australasian harrier/<i>Circus approximans</i> • Karoro/Black backed gull/<i>Larus dominicanus</i> • Koparapara or Korimako/Bellbird/<i>Anthornis melanura melanura</i> • Pākura or Pūkeko/Swamp Hen or Pukeko/<i>Porphyrio porphyrio</i> • Pihoihi/New Zealand pipit/<i>Anthus novaeseelandiae</i> • Pīwakawaka/South Island Fantail/<i>Rhipidura fuliginosa fuliginosa</i> • Poaka/Pied stilt/<i>Himantopus himantopus</i> • Pūtakitaki/Paradise shelduck/<i>Tadorna variegata</i> In addition, the following are important species as they are listed as non-commercially harvested species -- they are known to us to be in the project area or wider catchment: • Kākahi or Koaru/freshwater mussels/<i>Unio menziesi</i> – now reclassified as <i>Echyridella menziesii</i> • Kanakana or Ute/southern lamprey/<i>Geotria australis</i> • Waikōura/freshwater crayfish/<i>Paranephrops</i> spp Finally, tuna/eels (shortfin eel <i>Anguilla australis</i> and longfin eel <i>Anguilla dieffenbachii</i>) and giant bully (<i>Gobiomorphus gobioides</i>) which are noted to potentially be in the area or in the wider catchment, are either listed as taonga fish species in the Ngāi Tahu Claims Settlement Act 1998 (Schedule 98 Part A: giant bully) or are generally considered taonga (tuna/longfin eel & shortfin eel).
Section 4 Conservation Act 1987 implications/considerations	No relevant conservation related interests have been identified at this time.
Potential Resource Management Act (RMA) considerations and effects:	The pre-lodgement consultation was primarily in relation to the wildlife approval being sought. Some primary considerations for DOC include that the relevant biodiversity and environmental effects are considered as part of the full and comprehensive AEE included with the substantive application and shall

<i>Note: DOC's role in relation to 53(2)(m)(i) FTAA</i>	specifically address the presence and management of lizards, birds, bats, threatened plant species and freshwater values including the effects on fishes waikoura/freshwater crayfish, and kākahi/freshwater mussels. The Department has a statutory requirement to advocate for the preservation of freshwater and customary fisheries. This application has the potential to impact on indigenous and recreational fisheries resources. The applicant should give particular consideration to these potential impacts and seek to minimise these impacts and protect indigenous and freshwater fisheries. Conditions should be developed and presented to manage any effects on the above. Further advice can be provided during any pre-lodgement consultation on the substantive application.
DOC Statutory Planning Document considerations in relation to site (e.g. CGP/CMS/CMP):	The following Statutory Planning documents are relevant to the proposal: • Conservation General Policy (2005); • Canterbury (Waitaha) Conservation Management Strategy 2016 The application is not inconsistent with the relevant statutory planning provisions. However, consideration needs to be given to: • The management of any threatened and at-risk species that may be found on the site to ensure their persistence; • Protection of freshwater fisheries, fish habitat and fish passage; and • The preservation of threatened indigenous freshwater species.
Any specific information requests to applicant(s)/agent for pre-app engagement at this point:	Should the application be referred, the applicant is encouraged to engage with DOC prior to lodging a substantive application, particularly in relation to any wildlife approvals. DOC may also be able to provide commentary on draft conditions for the management of effects on ecological values such as birds, bats, lizards and freshwater values.
Any further information/considerations:	Based on the information provided, the proposal may impact on the following areas of Public Conservation Land (as defined in the FTA): • Halswell River Esplanade Reserve (under s.23 of the Reserves Act), vested in Christchurch City Council; 

	• Halswell River Endowment Area (under s.23 of the Reserves Act), vested in Canterbury Regional Council  Under s.19 of the Act, DOC is required to prepare a report at the referral stage that sets out the existing arrangements for any public conservation land (PCL) within the project area and detail any risks or liabilities to the Crown that relate to the proposal as it affects the identified PCL. The identified areas of PCL are protected under the Reserves Act and administered by Christchurch City Council and Canterbury Regional Council respectively. As DOC is not the administering agency for these areas of PCL, DOC will be required to consult with the relevant administering agencies in the preparation of the s.19 report. DOC recommends that the applicant reach out to the relevant parks or land management divisions of the relevant councils and consult on any potential issues that may relate to the project in relation to the identified areas of PCL prior to submitting the application for referral.
Additional Notes:	While DOC will assist applicants as much as we can when they engage in pre-lodgement consultation, it is the applicant's responsibility to comply with the FTAA and ensure they have applied for all approvals they need. Guidance for applying for a wildlife approval under the Fast-track Approvals Act 2024 can be viewed here: Guidance for applying for a wildlife approval DOC encourages the applicant to share draft substantive application documents, including the proposed draft conditions, should the application be referred. This enables DOC to provide feedback on how the draft documents align with the information requirements of the Act, noting that DOC is unable to request further information once a completeness check is commenced by the EPA. Note that a panel will invite the statutory bodies listed in clause 4 of Schedule 7 to comment on any wildlife approval as part of any substantive application (NZCA, conservation boards, Fish and Game Council, and Game Animal

Council). We encourage applicants to engage with these bodies in advance of lodging a substantive application.

It is recommended that the information provided in any substantive application prepared under the FTAA be separated out by the various approvals sought (if multiple approvals are required) and all information requirements addressed for each approval sought.

Lizards

The preliminary environmental report indicates that there may be skinks present at the site (particularly within riparian margins, dense grasses, shelter belts and structures). Prior to the preparation of the substantive application, the applicant should ensure that site surveys are undertaken by a suitably qualified and experienced person to determine the presence (or not) of lizards on the site and specifically address the same in the substantive application documents.

A suitable release location should be identified for any lizards proposed to be salvaged and released.

Freshwater/Wetlands

The preliminary ecology report provided with the pre-lodgement information indicates that there are three natural waterways and two artificial waterways within the project area. These waterways flow into the Halswell River, with the upper reaches of the Halswell River being present within the Site. These waterways are recorded in the report as being potential habitat for shortfin eel, longfin eel, inanga, upland bully, common bully, brown trout, and possibly lamprey and giant bully. Based on our knowledge of the area we also note that waikōura/freshwater crayfish have been recorded in the project area, and kākahi/freshwater mussels are found in the Halswell River and so could potentially be present in project area including in Knights Stream. Should the application be referred, the substantive application should address potential effects on these species and how they will be managed.

The applicant should undertake surveys to confirm the presence (or not) of any wetlands on the site and specifically address how any wetlands will be managed in the substantive application documents. This includes confirmation of any works proposed within wetlands or waterways, including enhancement activities. It is recommended that the applicant provide a stocktake, undertaken by a suitably qualified and experienced person, of any current fish barriers onsite in the substantive application and advise of any proposed works to remove or alter them. The applicant should be aware of the Freshwater Fisheries Regulations and any approvals that may be required under the same, including those relating to stream crossings.

Bats

The preliminary environmental report indicates that no bats have been detected within 10 km of the site but acknowledges that this may be due to limited data. Some potential bat habitat (including trees and riparian margins) have been identified.

	It is recommended that the applicant ensure that site surveys are undertaken by a suitably qualified and experienced person to determine the presence, or not, of bats on the site and specifically address the same in the substantive application documents. Information and protocols for working with bats can be found here: Resources for bat workers: Bats/pekapeka. This information is provided to assist in the development of an effective Bat Management Plan (should the presence of bats be detected). Birds It is recommended that the applicant ensure that site surveys are undertaken by a suitably qualified and experienced person to determine the presence (or not) of birds on the site and specifically address the same in the substantive application documents. The draft ecological report notes the potential presence of multiple indigenous bird species and notes that pipit and oystercatchers may use the site for breeding. It is recommended that a Bird Management Plan be implemented to avoid effects on indigenous bird species. Some indigenous (absolutely protected) wildlife (native birds) may have territories inside the Project Area and will be reluctant to leave. Methods should be implemented to avoid effects on absolutely protected wildlife or the applicant should obtain Wildlife Act Authorisation. Offsetting for habitat loss off-site may be considered where effects cannot be avoided.
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Mahaanui Kurataiao Limited

B&A

Urban & Environmental

PRELIMINARY MANA WHENUA ADVICE

Pre-application advice on Fast Track job
J7906 – Candys and Sabys Road

To: Franco Farms Limited

Contact: Kerstin Ghisel

1.0 Mana Whenua Statement

Ngāi Tahu holds and exercises rangatiratanga within the Ngāi Tahu Takiwā and has done so since before the arrival of the Crown. The rangatiratanga of Ngāi Tahu resides within the Papatipu Rūnanga. The Crown and Parliament have recognised the enduring nature of that rangatiratanga through:

- Article II of Te Tiriti o Waitangi (Te Tiriti);
- the 1997 Deed of Settlement (Deed of Settlement) between Ngāi Tahu and the Crown; and
- the 1998 Ngāi Tahu Claims Settlement Act (NTCSA) in which Parliament endorsed and implemented the Deed of Settlement.

The contemporary structure of Ngāi Tahu is set down through the Te Rūnanga o Ngāi Tahu Act 1996 (TRoNT Act). Article II of Te Tiriti o Waitangi (Te Tiriti), the TRoNT Act, Ngāi Tahu Claims Settlement Act (NTCSA) 1998, and the 1997 Deed of Settlement (Deed of Settlement) between Ngāi Tahu and the Crown sets the requirements for recognition of tangata whenua in Canterbury.

As recorded in the Crown Apology to Ngāi Tahu in the NTCSA, the Ngāi Tahu Settlement marked a turning point, and the beginning of a “new age of co-operation”. The Crown apologised for its “past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the South Island lands within its boundaries” and confirmed that it “recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui”. This Mana Whenua Advice Report is provided without prejudice to the High Court freshwater claim¹.

Each Papatipu Rūnanga has their own respective takiwā, and each is responsible for protecting the tribal interests in their respective takiwā, not only on their own behalf of their own hapū, but again, on behalf of the entire tribe.

The following Rūnanga hold mana whenua over the project’s location, as it is within their takiwā:

- Te Hapū o Ngāti Wheke (Rāpaki)

¹Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

2.0 Summary of Proposal

Franco Farms Limited sought preliminary advice from Mahaanui Kurataiao on their proposed Fast Track application. The application will facilitate land development for residential purposes. The land is currently zoned rural under the Christchurch District Plan and Partially Operative Selwyn District Plan and the applicant is looking at a fast-track consent to facilitate development of the site.

The following response has been made based on the preliminary information provided to Mahaanui by the applicant (Franco Farms Limited) and the consultant (B&A Urban and Environmental) on 11 March 2026 via a hui. A site plan was also received as part of this application.

- No Assessment of Environmental Effects, site plans, or comprehensive proposal documents have been assessed at this time as there were not yet available / provided to Mahaanui.

3.0 Preliminary Feedback Disclosure

Mahaanui have been engaged to progress this information through a preliminary round of consultation with the understanding that **the response provided here is incomplete, and that the full impacts on tikanga Māori and mana whenua values cannot be assessed without a formal application.**

This response does not remove the need for mana whenua consultation once the proposal is formalised and the referral application has been made.

4.0 Consultation Methodology

Mahaanui Kurataiao Limited review the application documents and undertake an assessment of the information against the Mahaanui Iwi Management Plan.

A briefing report is prepared for Kaitiaki representatives who have been mandated by the Papatipu Rūnanga they represent to speak on behalf of hapū on environmental issues.

A Mahaanui Kurataiao Limited staff member meets with Kaitiaki representatives to discuss the application and Kaitiaki provide feedback based on Mātauranga Māori.

Preliminary Mana Whenua Advice is provided to outline the relevant policies in the Mahaanui Iwi Management Plan and the feedback provided by Kaitiaki representatives.

The relevant policies and Kaitiaki feedback for this application are provided in the following sections of this report.

5.0 Mahaanui Iwi Management Plan 2013

The Mahaanui Iwi Management Plan (IMP) is a written expression of kaitiakitanga, setting out how to achieve the protection of natural and physical resources according to Ngāi Tahu values, knowledge,

and practices. The plan has the mandate of the six Papatipu Rūnanga, and is endorsed by Te Rūnanga o Ngāi Tahu, as the iwi authority.

Natural resources – water (waterways, waipuna (springs), groundwater, wetlands); mahinga kai; indigenous flora and fauna; ngā tūtohu whenua and land - are taonga to mana whenua and they have concerns for activities potentially adversely affecting these taonga. These taonga are integral to the identity of ngā rūnanga mana whenua and they have a kaitiaki responsibility to protect them. The policies for protection of taonga that are of high significance to ngā rūnanga mana whenua are articulated in the IMP.

The policies in this plan reflect what Papatipu Rūnanga support, require, encourage, or actions to be taken with regard to resolving issues of significance in a manner consistent with the protection and enhancement of Ngāi Tahu values, and achieving the objectives set out in the plan.

The relevant Policies of the IMP to this proposal have been identified as:

5.3 WAI MĀORI

TĀNGATA WHENUA RIGHTS AND INTERESTS IN FRESHWATER

WM1.1 Ngāi Tahu, as tāngata whenua, have specific rights and interests, in how freshwater resources should be managed and utilised in the takiwā.

WM1.2 Te Tiriti o Waitangi is the basis for the relationship between Ngāi Tahu and local authorities (and water governance bodies) with regard to freshwater management and governance in the takiwā.

PRIORITIES FOR USE

WM3.1 To advocate for the following order of priority for freshwater resource use, consistent with the *Te Rūnanga o Ngāi Tahu Freshwater Policy Statement (1999)*:

- (1) That the mauri of freshwater resources (ground and surface) is protected and sustained in order to:
 - (a) Protect instream values and uses (including indigenous flora and fauna);
 - (b) Meet the basic health and safety needs of humans, specifically the provision of an untreated and reliable supply of drinking water to marae and other communities; and
 - (c) Ensure the continuation of customary instream values and uses.
- (2) That water is equitably allocated for the sustainable production of food, including stock water, the generation of energy; and
- (3) That water is equitably allocated for other abstractive uses (e.g. development aspirations).

WATER QUALITY

WM6.1 To require that the improvement of water quality in the takiwā is recognised as a matter of regional and immediate importance.

WM6.2 To require the water quality in the takiwā is of a standard that protects and provides for the relationship of Ngāi Tahu to freshwater. This means that:

- (a) The protection of the eco-cultural system (see box – Eco-cultural systems) is the priority, and land or resource use, or land use change, cannot impact on that system; and
- (b) Marae and communities have access to safe, reliable, and untreated drinking water; and
- (c) Ngāi Tahu and the wider community can engage with waterways for cultural and social well-being; and
- (d) Ngāi Tahu and the wider community can participate in mahinga kai/food gathering activities without risks to human health.

Discharges

WM6.8 To continue to oppose the discharge of contaminants to water, and to land where contaminants may enter water.

WM6.11 Consented discharge to land activities must be subject to appropriate consent conditions to protect ground and surface water, including but not limited to:

- (a) Application rates that avoid over saturation and nutrient loading;
- (b) Setback or buffers from waterways, wetlands, and springs;
- (c) Use of native plant species to absorb and filter contaminants; including riparian and wetland establishment and the use of planted swales; and
- (d) Monitoring requirements to enable assessment of the effects of the activity.

Controls on land use activities to protect water quality

WM6.16 To require, in the first instance, that all potential contaminants that may enter the water (e.g. nutrients, sediments and chemicals) are managed on site and at source rather than discharged off site. This applies to both rural and urban activities.

WM6.17 To require the development of stringent and enforceable controls on the following activities given the risk to water quality:

- (a) Subdivision and development adjacent to waterways;
- (b) Discharge to land activities associated with industry; and
- (c) Activities in the bed and margins of waterways, including gravel extraction.

REGIONAL WATER INFRASTRUCTURE

WM9.1 To advocate for a takiwā-wide robust evaluation and assessment of the land uses that our freshwater resources are supporting, including the assimilative capacity of the land and the long-term cumulative effects of land use, prior to looking for ways to provide more water.

Evaluating cultural effects and benefits

WM9.7 To require that any proposed regional water infrastructure scheme includes provisions for a contingency fund, to be used for remediation and to remedy unanticipated effects on the environment (e.g. dam failure) and unforeseen cumulative effects on water quality.

UNNATURAL MIXING OF WATER

WM10.1 In principle, the unnatural mixing of water from different sources between or within catchments is culturally inappropriate.

WM10.2 Water infrastructure proposals that will result in the unnatural mixing of waters will be assessed by Papatipu Rūnanga on a case by case basis, allowing for consideration of:

- (a) The varying perspectives of different hapū to the unnatural mixing of waters in their takiwā;
- (b) The current state of water quality, water quantity, indigenous biodiversity and other cultural values within particular waterways; and
- (c) Different mixing scenarios, including provisions to avoid or mitigate cultural issues and/or provide cultural benefit.

ACTIVITIES IN THE BEDS AND MARGINS OF RIVERS AND LAKES

Riparian areas

WM12.2 To require the protection and restoration of native riparian vegetation along waterways and lakes in the takiwā as a matter of priority, and to ensure that this can occur as a permitted activity.

Use and enhancement of river margins in the built/ urban environment

WM12.4 All waterways in the urban and built environment must have indigenous vegetated healthy, functioning riparian margins.

WM12.5 To require that all waterways in the urban and built environment have buffers or setback areas from residential, commercial, or other urban activity that are:

- (a) At least 10 metres, and up to 30 metres; and
- (b) Up to 50 metres where the space, such as towards river mouths and in greenfield areas.

WM12.6 In the urban environment, it is accepted that waterways may have existing exotic vegetation along margins (e.g. exotic specimen trees in waterside reserves). However, the objective is still to promote native riparian vegetation, as taonga valued for flood control, the maintenance of water quality, mahinga kai and cultural wellbeing.

Structures in the beds and margins of waterways

WM12.13 To require that any structure, essential or otherwise, in the bed or margin of a waterway (e.g. floodgate) supports and enables passage for migratory indigenous fish species and does not compromise any associated kōhanga.

WETLANDS, WAIPUNA AND RIPARIAN MARGINS

WM13.1 To recognise and protect all wetlands, waipuna and riparian areas as wāhi taonga that provide important cultural and environmental benefits, including but not limited to:

- (a) Mahinga kai habitat;
- (b) The provision of resources for cultural use;
- (c) Cultural well-being;
- (d) The maintenance and improvement of water quality; and
- (e) Natural flood protection.

WM13.2 To protect, restore, and enhance remaining wetlands, waipuna, and riparian areas by:

- (a) Maintaining accurate maps of existing wetlands, waipuna, and riparian margins;
- (b) Requiring that the drainage of existing wetlands or waipuna or the destruction of modification of existing native riparian areas be a prohibited activity;

- (c) Requiring the use of appropriate fencing, buffers, and setback area to protect wetlands, waipuna, and riparian areas from intensive land use, including stock access and irrigation;
- (d) Supporting initiatives to restore wetlands, waipuna, and riparian areas; and
- (e) Continuing to educate the wider community and landowners of the taonga value of these ecosystems.

Comment: *Tāngata whenua have a particular interest in the beds of lakes and rivers and their margins. River and lake beds and their margins may be significant for cultural use or for the presence of significant sites.*

5.4 PAPATŪĀNUKU

SUBDIVISION AND DEVELOPMENT

Basic principles and guidelines

P4.3 To base tāngata whenua assessments and advice for subdivision and residential land development proposals on a series of principles and guidelines associated with key issues of importance concerning such activities, as per Ngāi Tahu subdivision and development guidelines.

STORMWATER

P6.1 To require **on-site** solutions to stormwater management in all new urban, commercial, industrial, and rural developments (zero stormwater discharge off site) based on a multi-tiered approach to stormwater management:

- (a) Education- engaging greater general public awareness of stormwater and its interaction with the natural environment, encouraging them to take the steps to protect their local environment and perhaps re-use stormwater where appropriate;
- (b) Reduce volume entering system - implementing measures that reduce the volume of stormwater requiring treatment (e.g. rainwater collection tanks);
- (c) Reduce contaminants and sediments entering system – maximising opportunities to reduce contaminants entering stormwater e.g. oil collection pits in carparks, education of residents, treat the water, methods to improve quality; and
- (d) Discharge to land-based methods, including swales, stormwater basins, retention basins, and constructed wet ponds and wetlands (environmental infrastructure), using appropriate native plant species, recognising the ability of particular species to absorb water and filter waste.

P6.2 To oppose the use of existing natural waterways and wetlands, and drains, for the treatment and discharge of stormwater in both urban and rural environments.

P6.3 Stormwater should not enter the wastewater reticulation system in existing urban environments.

P6.4 To require that the incremental and cumulative effects of stormwater discharge are recognised and provided for in local authority planning and assessments.

P6.6 To oppose the use of global consents for stormwater discharges.

DISCHARGE TO LAND

- P8.1** To require that discharge to land activities in the takiwā:
- (a) Are appropriate to the soil type and slope, and the assimilative capacity of the land on which the discharge activity occurs;
 - (b) Avoid over-saturation and therefore the contamination of soil, and/or run off and leaching; and
 - (c) Are accompanied by regular testing and monitoring of one or all of the following soil, foliage, groundwater, and surface water in the area.
- P8.2** In the event that the accumulation of contaminants in the soil is such that the mauri of the soil resource is compromised, then the discharge activity must change or cease as a matter of priority.

SOIL CONSERVATION

- P9.1** To sustain and safeguard the life supporting capacity of soils, mō tātou, ā, mō kā uri ā muri ake nei.
- P9.2** To require the appropriate valuation of soil resources as taonga and as natural capital, providing essential ecosystem services.
- P9.3** To protect the land from induced soil erosion as a result of unsustainable land use and development.

CONTAMINATED LAND

- P10.1** The management of contaminated land must recognise and provide for specific cultural issues, including:
- (a) The location of contaminated sites;
 - (b) The nature of the contamination;
 - (c) The potential for leaching and run-off;
 - (d) Proposed land-use changes; and
 - (e) Proposed remediation or mitigation work.
- P10.2** To require appropriate and meaningful information sharing between management agencies and tāngata whenua on issues associated with contaminated sites.

EARTHWORKS

- P11.1** To assess proposals for earthworks with particular regard to:
- (a) Potential effects on wāhi tapu and wāhi taonga, known and unknown;
 - (b) Potential effects on waterways, wetlands and waipuna;
 - (c) Potential effects on indigenous biodiversity;
 - (d) Potential effects on natural landforms and features, including ridge lines;
 - (e) Proposed erosion and sediment control measures; and
 - (f) Rehabilitation and remediation plans following earthworks.

Risk of damage of modification to sites of significance

- P11.2** To require that tāngata whenua are able to identify particular areas whereby earthworks activities are classified as a restricted discretionary activity, with Ngāi Tahu values as a matter of discretion.
- P11.3** To use the methods identified in Section 5.8 Policy CL4.6 (Wāhi tapu me wāhi taonga) where an earthworks activity is identified by tāngata whenua as having actual or potential adverse effects on known or unknown sites of significance.

Erosion and sediment control

P11.9 To require stringent and enforceable controls on land use and earthworks activities as part of the resource consent process, to protect waterways and waterbodies from sedimentation, including but not limited to:

- (a) The use of buffer zones;
- (b) Minimising the extent of land cleared and left bare at any given time; and
- (c) Capture of run-off, and sediment control.

Comment: *Land use and development activities in the takiwā must be managed in way that works with the land and not against it. While subdivision and residential land development activities can have adverse effects on cultural values, they can also provide cultural benefits, including opportunities to re affirm connections between tāngata whenua and place.*

5.5 TĀNE MAHUTA

INDIGENOUS BIODIVERSITY

TM2.2 To recognise Te Tiriti o Waitangi as the basis for the relationship between central and local government and tāngata whenua with regard to managing indigenous biodiversity, as per duty of active protection of Māori interests and the principle of partnership.

Integrating indigenous biodiversity into the landscape

TM2.8 To require the integration of robust biodiversity objectives in urban, rural land use and planning, including but not limited to:

- (a) Indigenous species in shelter belts on farms;
- (b) Use of indigenous plantings as buffers around activities such as silage pits, effluent ponds, oxidation ponds, and industrial sites;
- (c) Use or indigenous species as street trees in residential developments, and in parks and reserves and other open space; and
- (d) Establishment of planted indigenous riparian margins along waterways.

RESTORATION OF INDIGENOUS BIODIVERSITY

TM3.1 To approach restoration of indigenous biodiversity in the takiwā based on the following principles:

- (a) Restoration of indigenous biodiversity is about restoring original and natural landscapes, and therefore the mauri of the land; and
- (b) Restoration of indigenous biodiversity is about restoring the relationship of Ngāi Tahu to important places and resources; including planning for customary use.

TM3.2 To advocate for an approach to restorations based on ‘working with the land rather than against it’, including but not limited to:

- (a) Establishment of long term, intergenerational vision, and objectives (50 and 100 years ahead); and
- (b) Use of natural succession and staged re-planting rather than spraying and burning (e.g. natural succession of indigenous species into areas of gorse and broom; staged underplanting of natives into wetland and lagoon areas full of willow).

Comment: *Ngāi Tahu has a particular interest in indigenous biodiversity, both for its inherent value on the landscape and the ecosystem services it provides, and with regard to mahinga kai. The*

protection and enhancement of indigenous biodiversity and mahinga kai underpins many of the issues and policies in the Mahaanui IMP.

5.8 NGĀ TŪTOHU WHENUA

RECOGNISING CULTURAL LANDSCAPES

Recognising cultural landscapes

CL1.1 To require that the local and central government recognise and provide for the ability of tāngata whenua to identify particular landscapes as significant cultural landscapes, reflecting:

- (a) Concentration, distribution, and nature of wāhi tapu and wāhi taonga;
- (b) Setting within which sites occur and significance of setting;
- (c) Significance with regard to association and relationship to place; and
- (d) Degree of risk/ threat.

CL1.4 To require that oral tradition and history is considered equally alongside documented evidence when determining the cultural landscape values associated with a particular area or site.

WĀHI TAPU ME WĀHI TAONGA

CL3.1 All taonga within the takiwā of Ngāi Tahu, accidental discovery or otherwise, belong to the Papatipu Rūnanga/ Te Rūnanga o Ngāi Tahu.

Protecting wāhi tapu and wāhi taonga

CL3.8 To require, where a proposal is assessed by tāngata whenua as having the potential to affect wāhi tapu or wāhi taonga, one or more of the following:

- (a) Low risk to sites:
 - (i) Accidental discovery protocol (ADP).

Comment: *As a planning tool, cultural landscapes are a culturally meaningful and effective framework for the identification, protection and management of sites and places of significance, the multiple values associated with those sites and places, and the relationship of tāngata whenua to them.*

5.1 Guidance to Moderate Impacts on Mana Whenua Values

The above policies from the Mahaanui Iwi Management Plan provide a framework for assessing the potential negative impacts of the proposed activity on Mana Whenua values and provide guidance on how these effects can be moderated.

Te Hapū o Ngāti Wheke have a unique and abiding interest in the sustainable management of te taiao – the environment. Wai māori (freshwater) is a taonga of Ngāi Tahu, governed under the domain of rangatiratanga and defined by Ngāi Tahu tikanga and ritenga.

Te Hapū o Ngāti Wheke as tāngata whenua have customary rights and responsibilities associated with freshwater resources in the region, as expressed through the exercise of manawhenua, rangatiratanga, kaitiakitanga and manaakitanga, and as guaranteed by Te Tiriti o Waitangi. Ensuring that freshwater management recognises and provides for these rights and interests is critical to

enabling tāngata whenua to protect water as a taonga for future generations. Kaitiaki have indicated that the setback margins are not sufficient for this site and should be at least 10m, verified with a site visit to undertake ground truthing of these margins. Recommendations 12 and 13 are also provided to ensure appropriate riparian margin is allowed for and no impervious surface is created within 20m of the Hurutini River.

Kaitiaki of Te Hapū o Ngāti Wheke note that they are opposed to the option of diverting the Hurutini to install three waters infrastructure and would like further exploration and explanation of other options for this. Diversion does not enhance the mana of waterways or groundwater and is not consistent with the NPS-FM (Te Mana o te Wai) hierarchy of obligations by prioritising the mana and mauri of water bodies, and the Mahaanui Iwi Management Plan policies WM9.1 and WM9.7 provide a framework of cultural and environmental considerations against which regional infrastructure proposals can be assessed. The approach sets out the cultural parameters or thresholds against which activities such as damming and diversions should be assessed. An issue of particular significance concerning regional infrastructure proposals is the unnatural mixing of water (Issue WM10), in this case between groundwaters and surface waters due to the likely shallow groundwater depth. For Ngāi Tahu there are cultural and environment risks associated with the unnatural mixing of waters from different environments.

Measures must be taken to avoid spills of fuel or any other hazardous substances within the site, given the number of waterways on site and likely shallow groundwater level. As per IMP policy section P9, soil conservation is critical due to the true (and non-replaceable) value of our soils. Recommendation 7 is provided to ensure appropriate mitigation and management strategies for spills are employed on site.

Land use, subdivision and development activities must have appropriate controls to avoid over saturation, contamination and erosion of soils, especially in areas with shallow groundwater levels or waterways on site as in this project location. Erosion and sediment control is a key issue of concern when undertaking any earthworks. Activities such as residential land development can leave large areas of land cleared with bare soil exposed, increasing the risk of erosion and the discharge of sediment into waterways, harbours or the sea. Recommendation 2 is provided to ensure appropriate erosion and sediment control measures. This is emphasised for any works that may occur near any waterways on site.

While subdivision and residential land development activities can have adverse effects on cultural values, they can also provide cultural benefits. Working to ensure developments have 'light footprints' with regard given to building design, water, waste, and energy can provide cultural benefits. The overall proposal should refer to the Ngāi Tahu Subdivision and Development Guidelines provided in Appendix 2. Recommendations 4 and 5 are provided, as well as recommendation 8 to ensure best practice treatment of stormwater before discharge.

Incorporating indigenous vegetation wherever possible on site such as for street trees and general landscaping and in stormwater detention areas provides a range of benefits such as increasing indigenous habitat throughout the takiwā, binding/stabilising soil, nutrient uptake, and carbon sequestration – all of which help support a healthy environment and enhance the indigenous

biodiversity values of a landscape. Recommendations 9, 10 and 11 are provided to ensure appropriate inclusion of indigenous vegetation throughout the development.

The values associated with particular cultural landscapes are indicators of what tāngata whenua value most about the land. Any activity that involves ground disturbance has the potential to uncover cultural material or wāhi tapu. How this potential is managed is dependent on the level of risk identified by tāngata whenua. To ensure the protection of taonga and Māori archaeological sites, an Accidental Discovery Protocol (Appendix 1) should be in place during all future earthwork activities required to give effect to this consent. This protocol outlines the procedures to be followed if culturally sensitive material is uncovered.

Further to this, papatipu rūnanga may have different ways of defining, identifying and classifying significant sites in their takiwā. In areas identified as high risk, archaeological assessments, Archaeological Authorities, cultural impact assessments, cultural monitoring, or some combination of these will be required. Due to the nature of this site and proximity to the coastline, Te Hapū o Ngāti Wheke (Rapaki) should be advised at least 15 days prior to commencement of works to provide them an opportunity to have a cultural environmental monitor present during these works. The invoice for this will be sent to the consent holder.

6.0 Rūnanga – Affected Party or Not

In terms of this response, Mahaanui Kurataiao has attempted to address matters of fundamental concern to Te Hapū o Ngāti Wheke. The fact that Mahaanui Kurataiao has not commented on any particular matter should not be taken as support thereof and Te Hapū o Ngāti Wheke reserves the right to comment on additional matters in a future stage of engagement or when more information becomes available.

The Kaitiaki representatives of Te Hapū o Ngāti Wheke have reviewed this application and provided the recommendations outlined in Section 7.0 to align this proposal more closely with the provisions in the Mahaanui IMP.

7.0 Recommendations and Feedback

The following recommendations should be considered to moderate effects of this proposed activity on mana whenua values:

General

1. An Accidental Discovery Protocol (ADP) should be in place during all earthworks required to exercise this consent to deal with archaeological finds and protect the interests of mana whenua. This condition does not constitute a response under the Heritage New Zealand Pouhere Taonga Act (HNZPT 2014).
2. An Erosion and Sediment Control Plan for any earthworks required to give effect to this consent should be prepared, implemented, inspected, and maintained in accordance with

Environment Canterbury's *Erosion and Sediment Control Toolbox* for Canterbury until such time the site is stabilised.

- a. Erosion and sediment control measures should effectively minimise sediment in stormwater discharged during the construction phase.
 - b. If the erosion and sediment controls prove to be inadequate, works should cease until appropriate and effective measures are in place.
3. A Cultural Impact Assessment (CIA) must be undertaken as part of the fast track process for this site due to the high risk of flooding. This must be undertaken by a suitably qualified individual selected by Te Hapū o Ngāti Wheke.
4. The future development of the lots should align with the *Ngāi Tahu Subdivision and Development Guidelines*.
5. The consent holder should incorporate the *Ngāi Tahu Subdivision and Development Guidelines* to the greatest practical extent. The site should incorporate sustainable urban design features with respect to stormwater runoff and greywater reuse including:
 - a. Greywater capture and reuse.
 - b. Rainwater capture and reuse (i.e., rainwater collection tanks).
 - c. Minimising impervious cover (e.g., using permeable paving and maintaining grass cover).
 - d. The use of rain gardens and swales (or other land-based methods) planted with appropriate native species, rather than standard curb and channel.
 - e. Avoiding the use of building material known to generate contaminants such as copper guttering and roofing.
6. Te Hapū o Ngāti Wheke should be advised at least 15 days prior to commencement of works to provide them an opportunity to have a cultural environmental monitor present during these works. The invoice for this will be sent to the consent holder.
NB. Contact details can be found in the ADP in Appendix 1.
7. Measures should be taken to avoid spills of fuel or any other hazardous substances within the site. These measures shall include:
 - a. Refuelling of machinery and vehicles must not occur within 20 metres of:
 - i. Open excavations;
 - ii. Exposed groundwater;
 - iii. Surface water bodies; or
 - iv. Stormwater devices.
 - b. Storing fuel securely or removing fuel from site overnight.
 - c. A spill kit must be kept on site that is capable of absorbing the quantity of oil and petroleum products that may be spilt on site at any one time, remains on site at all times.

- d. In the event of a spill of fuel or any other hazardous substance, the spill must be cleaned up as soon as practicable, the area must be inspected and cleaned, and measures taken to prevent a recurrence.

Stormwater

8. Stormwater should be treated before discharge, including a minimum of first flush treatment and heavy metal treatment.

Ecology

9. Indigenous planting is required to enhance the cultural landscape, increase indigenous habitat, filter sediment and sequester carbon.
 - a. Riparian planting should enhance ecological values of the waterway
 - b. Plants that mature to a height of at least the width of the waterways should be provided.
10. Indigenous plants should be incorporated into development plans, consistent with the restoration and enhancement of indigenous biodiversity on the landscape.
 - a. For example, indigenous species should be used for street trees, open space and reserves, ground cover for swales, stormwater management network, and home gardens.
11. Indigenous species used in planting and landscaping should be appropriate to the local environment and sourced from local seed supplies.
12. The consent holder should not create new impervious surfaces within the waterway setback of 20m along the Halswell River.
13. A minimum setback of 10m from all waterways should be adhered to for all construction and development on site.

Comments:

- Kaitiaki support Taumutu Rūnanga in their request to have a CIA undertaken for this site and wish to be included in this request.
- Kaitiaki would also like to support the recommendation from Te Taumutu Rūnanga that ground truthing of setback margins is required and wish to attend a site visit.

On behalf of Mahaanui Kurataiao Ltd, this report has been prepared by Tayla Spencer | Mahaanui Kurataiao Ltd Pou Taiao, and peer reviewed by Tama Hamilton-Morrison | Mahaanui Kurataiao Ltd Pou Taiao.

Date: 17 April 2026

This information is provided in good faith for the purpose of engagement on this Fast Track pre-application advice. Parts of this information is sensitive and is shared only to provide context for decision matters. Should a request for information be received by the Council under the Local Government Official Information and Meetings Act 1987 in relation to this

information, it is requested that it is withheld in full or in part (in consultation with rūnanga) under section 7(2)(ba) of the Local Government Official Information and Meetings Act 1987.

Appendix 1: Accidental Discovery Protocol (ADP)

PRIOR TO COMMENCEMENT OF ANY WORKS, A COPY OF THIS ADP SHOULD BE MADE AVAILABLE TO ALL CONTRACTORS WORKING ON SITE.

Purpose

This Accidental Discovery Protocol (ADP) sets out the procedures that must be followed in the event that taonga (Māori artefacts), burial sites/kōiwi (human remains), or Māori archaeological sites are accidentally discovered. The Protocol is provided by Te Hapū o Ngāti Wheke (Rāpaki). Te Hapū o Ngāti Wheke (Rāpaki) is the representative body of the tangata whenua who hold mana whenua in the proposed area.

Background

Land use activities involving earthworks have the potential to disturb material of cultural significance to tangata whenua. In all cases such material will be a taonga, and in some cases such material will also be tapu. Accidental discoveries may be indicators of additional sites in the area. They require appropriate care and protection, including being retrieved and handled with the correct Māori tikanga (protocol).

Under the *Heritage New Zealand Pouhere Taonga Act 2014*, an archaeological site is defined as any place associated with pre-1900 human activity, where there is material evidence relating to the history of New Zealand. It is unlawful for any person to destroy, damage or modify the whole or any part of an archaeological site (known or unknown) without the prior authority of the Heritage New Zealand Pouhere Taonga (HNZPT). This is the case regardless of the legal status of the land on which the site is located, whether the activity is permitted under the District or Regional Plan or whether a resource or building consent has been granted. The HNZPT is the statutory authority for archaeology in New Zealand.

Note that this ADP does not fulfil legal obligations under the Heritage New Zealand Pouhere Taonga Act 2014 regarding non-Māori archaeology. Please contact the HNZPT for further advice.

Immediately following the discovery of material suspected to be a taonga, kōiwi or Māori archaeological site, the following steps shall be taken:

1. **All work on the site will cease immediately.**
2. Immediate steps will be taken to secure the site to ensure the archaeological material is not further disturbed.
3. The contractor/works supervisor/owner will notify the Kaitiaki Rūnanga and the Area Archaeologist of the HNZPT. In the case of kōiwi (human remains), the New Zealand Police must be notified.

4. The Kaitiaki Rūnanga and HNZPT will jointly appoint/advise a qualified archaeologist who will confirm the nature of the accidentally discovered material.
5. If the material is confirmed as being archaeological, the contractor/works supervisor/owner will ensure that an archaeological assessment is carried out by a qualified archaeologist, and if appropriate, an archaeological authority is obtained from HNZPT before work resumes (as per the *Heritage New Zealand Pouhere Taonga Act 2014*).
6. The contractor/works supervisor/owner will also consult the Kaitiaki Rūnanga on any matters of tikanga (protocol) that are required in relation to the discovery and prior to the commencement of any investigation.
7. If kōiwi (human remains) are uncovered, in addition to the steps above, the area must be treated with utmost discretion and respect, and the kōiwi dealt with according to both law and tikanga, as guided by the Kaitiaki Rūnanga.
8. Works in the site area shall not recommence until authorised by the Kaitiaki Rūnanga, the HNZPT (and the NZ Police in the case of kōiwi) and any other authority with statutory responsibility, to ensure that all statutory and cultural requirements have been met.
9. All parties will work towards work recommencing in the shortest possible time frame while ensuring that any archaeological sites discovered are protected until as much information as practicable is gained and a decision regarding their appropriate management is made, including obtaining an archaeological authority under the *Heritage New Zealand Pouhere Taonga Act 2014* if necessary. Appropriate management may include recording or removal of archaeological material.
10. Although bound to uphold the requirements of the Protected Objects Act 1975, the contractor/works supervisor/owner recognises the relationship between Ngāi Tahu whānui, including its Kaitiaki Rūnanga, and any taonga (Māori artefacts) that may be discovered.

IN DOUBT, STOP AND ASK; TAKE A PHOTO AND SEND IT TO THE HNZPT ARCHAEOLOGIST

Contact Details

HNZPT Archaeologist: (03) 357 9615 archaeologistcw@heritage.org.nz

HNZPT Southern Regional Office (03) 357 9629 infosouthern@heritage.org.nz

HNZPT Māori Heritage Advisor (03) 357 9620 pouarahisouth@heritage.org.nz

Kaitiaki Rūnanga:

Te Hapū o Ngāti Wheke (Rāpaki) Rūnanga: (03) 328 9415, rapaki@ngaitahu.iwi.nz

Appendix 2: Ngāi Tahu Subdivision and Development Guidelines

Note: These guidelines are to be read in conjunction with Policies P4.1, P4.2 and P4.3 within the Mahaanui IMP.

Cultural landscapes

- 1.1 A cultural landscape approach is the most appropriate means to identify, assess and manage the potential effects of subdivision and development on cultural values and significant sites [refer Section 5.8 Issue CL1].
- 1.2 Subdivision and development that may impact on sites of significance is subject Ngāi Tahu policy on Wāhi tapu me wāhi taonga and Silent Files (Section 5.8, Issues CL3 and CL4).
- 1.3 Subdivision and development can provide opportunities to recognise Ngāi Tahu culture, history and identity associated with specific places, and affirm connections between tāngata whenua and place, including but not limited to:
 - (i) Protecting and enhancing sites of cultural value, including waterways;
 - (ii) Using traditional Ngāi Tahu names for street and neighbourhood names, or name for developments;
 - (iii) Use of indigenous species as street trees, in open space and reserves;
 - (iv) Landscaping design that reflects cultural perspectives, ideas, and materials;
 - (v) Inclusion of interpretation materials, communicating the history and significance of places, resources, and names to tāngata whenua; and
 - (vi) Use of tāngata whenua inspired and designed artwork and structures.

Stormwater

- 2.1 All new developments must have on-site solutions to stormwater management (i.e. zero stormwater discharge off site), based on a multi-tiered approach to stormwater management that utilises the natural ability of Papatūānuku to filter and cleanse stormwater and avoids the discharge of contaminated stormwater to water [refer to Section 5.4, Policy P6.1].
- 2.2 Stormwater swales, wetlands and retention basins are appropriate land-based stormwater management options. These must be planted with native species (not left as grass) that are appropriate to the specific use, recognising the ability of particular species to absorb water and filter waste.

- 2.3** Stormwater management systems can be designed to provide for multiple uses. For example, stormwater management infrastructure as part of an open space network can provide amenity values, recreation, habitat for species that were once present on the site, and customary use.
- 2.4** Appropriate and effective measures must be identified and implemented to manage stormwater run-off during the construction phase, given the high sediment loads that stormwater may carry as a result of vegetation clearance and bare land.
- 2.5** Councils should require the upgrade and integration of existing stormwater discharges as part of stormwater management on land rezoned for development.
- 2.6** Developers should strive to enhance existing water quality standards in the catchment downstream of developments, through improved stormwater management.

Earthworks

- 3.1** Earthworks associated with subdivision and development are subject to the general policy on Earthworks (Section 5.4 Issue P11) and Wāhi tapu me wāhi taonga (Section 5.8, Issue CL3), including the specific methods used in high and low risk scenarios for accidental finds and damage to sites of significance.
- 3.2** The area of land cleared and left bare at any time during development should be kept to a minimum to reduce erosion, minimise stormwater run-off and protect waterways from sedimentation.
- 3.3** Earthworks should not modify or damage beds and margins of waterways, except where such activity is for the purpose of naturalisation or enhancement.
- 3.4** Excess soil from sites should be used as much as possible on site, as opposed to moving it off site. Excess soil can be used to create relief in reserves or buffer zones.

Water supply and use

- 4.1** New developments should incorporate measures to minimise pressure on existing water resources, community water supplies and infrastructure, including incentives or requirements for:
- (i) low water use appliances and low flush toilets;
 - (ii) grey water recycling; and
 - (iii) rainwater collection.
- 4.2** Where residential land development is proposed for an area with existing community water supply or infrastructure, the existing supply or infrastructure must be proven to be able to accommodate the increased population prior to the granting of subdivision consent.

4.3 Developments must recognise, and work to, existing limits on water supply. For example, where water supply is an issue, all new dwellings should be required to install rainwater collection systems.

Waste treatment and disposal

5.1 Developments should implement measures to reduce the volume of waste created within the development, including but not limited incentives or requirements for:

- (i) Low water use appliances and low flush toilets;
- (i) Grey water recycling; and
- (ii) Recycling and composting opportunities (e.g. supporting zero waste principles).

5.2 Where a development is proposed for an area with existing wastewater infrastructure, the infrastructure must be proven to be able to accommodate the increased population prior to the granting of the subdivision consent.

5.3 New rural residential or lifestyle block developments should connect to a reticulated sewage network if available.

5.4 Where new wastewater infrastructure is required for a development:

- (i) The preference is for community reticulated systems with local treatment and land-based discharge rather than individual septic tanks; and
- (ii) Where individual septic tanks are used, the preference is a wastewater treatment system rather than septic tanks.

Design guidelines

6.1 New developments should incorporate low impact urban design and sustainability options to reduce the development footprint on existing infrastructure and the environment, including sustainable housing design and low impact and self-sufficient solutions for water, waste, energy such as:

- (i) Position of houses to maximise passive solar gain;
- (ii) Rainwater collection and greywater recycling;
- (iii) Low energy and water use appliances;
- (iv) Insulation and double glazing; and
- (v) Use of solar energy generation for hot water.

- 6.2** Developers should provide incentives for homeowners to adopt sustainability and self-sufficient solutions as per 6.1 above.
- 6.3** Urban and landscape design should encourage and support a sense of community within developments, including the position of houses, appropriately designed fencing, sufficient open spaces, and provisions for community gardens.
- 6.4** Show homes within residential land developments can be used to showcase solar hot water, greywater recycling and other sustainability options, and raise the profile of low impact urban design options.

Landscaping and open space

- 7.1** Sufficient open space is essential to community and cultural wellbeing, and the realization of indigenous biodiversity objectives, and effective stormwater management.
- 7.2** Indigenous biodiversity objectives should be incorporated into development plans, consistent with the restoration and enhancement of indigenous biodiversity on the landscape.
- 7.3** Indigenous biodiversity objectives to include provisions to use indigenous species for:
- (i) street trees;
 - (ii) open space and reserves;
 - (iii) native ground cover species for swales;
 - (iv) stormwater management network; and
 - (v) home gardens.
- 7.4** Indigenous species used in planting and landscaping should be appropriate to the local environment, and where possible from locally sourced seed supplies.
- 7.5** Options and opportunities to incorporate cultural and/or mahinga kai themed gardens in open and reserve space can be considered in development planning (e.g. pā harakeke as a source of weaving materials; reserves planted with tree species such as mātai, kahikatea and tōtara could be established with the long-term view of having mature trees available for customary use).
- 7.6** Developers should offer incentives for homeowners to use native species in gardens, including the provision of lists of recommended plants to avoid, discounts at local nursery, and landscaping ideas using native species.

PRELIMINARY MANA WHENUA ADVICE

Pre-application advice on Fast Track
J7906 – Candys and Sabys Road

To: Franco Farms Limited

Contact: Kerstin Ghisel

1.0 Mana Whenua Statement

Ngāi Tahu holds and exercises rangatiratanga within the Ngāi Tahu Takiwā and has done so since before the arrival of the Crown. The rangatiratanga of Ngāi Tahu resides within the Papatipu Rūnanga. The Crown and Parliament have recognised the enduring nature of that rangatiratanga through:

- Article II of Te Tiriti o Waitangi (Te Tiriti);
- the 1997 Deed of Settlement (Deed of Settlement) between Ngāi Tahu and the Crown; and
- the 1998 Ngāi Tahu Claims Settlement Act (NTCSA) in which Parliament endorsed and implemented the Deed of Settlement.

The contemporary structure of Ngāi Tahu is set down through the Te Rūnanga o Ngāi Tahu Act 1996 (TRoNT Act). Article II of Te Tiriti o Waitangi (Te Tiriti), the TRoNT Act, Ngāi Tahu Claims Settlement Act (NTCSA) 1998, and the 1997 Deed of Settlement (Deed of Settlement) between Ngāi Tahu and the Crown sets the requirements for recognition of tangata whenua in Canterbury.

As recorded in the Crown Apology to Ngāi Tahu in the NTCSA, the Ngāi Tahu Settlement marked a turning point, and the beginning of a “new age of co-operation”. The Crown apologised for its “past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the South Island lands within its boundaries” and confirmed that it “recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui”. This Mana Whenua Advice Report is provided without prejudice to the High Court freshwater claim¹.

Each Papatipu Rūnanga has their own respective takiwā, and each is responsible for protecting the tribal interests in their respective takiwā, not only on their own behalf of their own hapū, but again, on behalf of the entire tribe.

The following Rūnanga hold mana whenua over the project’s location, as it is within their takiwā:

- Te Taumutu Rūnanga

¹Tau & Ors v Attorney-General, HC Christchurch CIV 2020-409-534

2.0 Summary of Proposal

Franco Farms Limited sought preliminary advice from Mahaanui Kurataiao on their proposed Fast Track application. The application will facilitate land development for residential purposes. The land is currently zoned rural under the Christchurch District Plan and Partially Operative Selwyn District Plan and the applicant is looking at a fast-track consent to facilitate development of the site.

The following response has been made based on the preliminary information provided to Mahaanui by the applicant (Franco Farms Limited) and the consultant (B&A Urban and Environmental) on 11 March 2026 via a hui. A site plan was also received as part of this pre-application consultation.

No Assessment of Environmental Effects, site plans, or comprehensive proposal documents have been assessed by Mahaanui at this time as there were not yet available / provided to Mahaanui.

3.0 Preliminary Feedback Disclosure

Mahaanui have been engaged to progress this information through a preliminary round of consultation with the understanding that **the response provided here is incomplete, and that the full impacts on tikanga Māori and mana whenua values cannot be assessed without a formal application.**

This response does not remove the need for mana whenua consultation once the proposal is formalised and the referral application has been made.

4.0 Consultation Methodology

Mahaanui Kurataiao Limited review the application documents and undertake an assessment of the information against the Mahaanui Iwi Management Plan.

A briefing report is prepared for Kaitiaki representatives who have been mandated by the Papatipu Rūnanga they represent to speak on behalf of hapū on environmental issues.

A Mahaanui Kurataiao Limited staff member meets with Kaitiaki representatives to discuss the application and Kaitiaki provide feedback based on Mātauranga Māori.

Preliminary Mana Whenua Advice is provided to outline the relevant policies in the Mahaanui Iwi Management Plan and the feedback provided by Kaitiaki representatives.

The relevant policies and Kaitiaki feedback for this application are provided in the following sections of this report.

5.0 Mahaanui Iwi Management Plan 2013

The Mahaanui Iwi Management Plan (IMP) is a written expression of kaitiakitanga, setting out how to achieve the protection of natural and physical resources according to Ngāi Tahu values, knowledge,

and practices. The plan has the mandate of the six Papatipu Rūnanga, and is endorsed by Te Rūnanga o Ngāi Tahu, as the iwi authority.

Natural resources – water (waterways, waipuna (springs), groundwater, wetlands); mahinga kai; indigenous flora and fauna; ngā tūtohu whenua and land - are taonga to mana whenua and they have concerns for activities potentially adversely affecting these taonga. These taonga are integral to the identity of ngā rūnanga mana whenua and they have a kaitiaki responsibility to protect them. The policies for protection of taonga that are of high significance to ngā rūnanga mana whenua are articulated in the IMP.

The policies in this plan reflect what Papatipu Rūnanga support, require, encourage, or actions to be taken with regard to resolving issues of significance in a manner consistent with the protection and enhancement of Ngāi Tahu values, and achieving the objectives set out in the plan.

The relevant Policies of the IMP to this proposal have been identified as:

5.3 WAI MĀORI

TĀNGATA WHENUA RIGHTS AND INTERESTS IN FRESHWATER

WM1.1 Ngāi Tahu, as tāngata whenua, have specific rights and interests, in how freshwater resources should be managed and utilised in the takiwā.

WM1.2 Te Tiriti o Waitangi is the basis for the relationship between Ngāi Tahu and local authorities (and water governance bodies) with regard to freshwater management and governance in the takiwā.

PRIORITIES FOR USE

WM3.1 To advocate for the following order of priority for freshwater resource use, consistent with the *Te Rūnanga o Ngāi Tahu Freshwater Policy Statement (1999)*:

- (1) That the mauri of freshwater resources (ground and surface) is protected and sustained in order to:
 - (a) Protect instream values and uses (including indigenous flora and fauna);
 - (b) Meet the basic health and safety needs of humans, specifically the provision of an untreated and reliable supply of drinking water to marae and other communities; and
 - (c) Ensure the continuation of customary instream values and uses.
- (2) That water is equitably allocated for the sustainable production of food, including stock water, the generation of energy; and
- (3) That water is equitably allocated for other abstractive uses (e.g. development aspirations).

WATER QUALITY

WM6.1 To require that the improvement of water quality in the takiwā is recognised as a matter of regional and immediate importance.

WM6.2 To require the water quality in the takiwā is of a standard that protects and provides for the relationship of Ngāi Tahu to freshwater. This means that:

- (a) The protection of the eco-cultural system (see box – Eco-cultural systems) is the priority, and land or resource use, or land use change, cannot impact on that system; and
- (b) Marae and communities have access to safe, reliable, and untreated drinking water; and
- (c) Ngāi Tahu and the wider community can engage with waterways for cultural and social well-being; and
- (d) Ngāi Tahu and the wider community can participate in mahinga kai/food gathering activities without risks to human health.

Discharges

WM6.8 To continue to oppose the discharge of contaminants to water, and to land where contaminants may enter water.

WM6.11 Consented discharge to land activities must be subject to appropriate consent conditions to protect ground and surface water, including but not limited to:

- (a) Application rates that avoid over saturation and nutrient loading;
- (b) Setback or buffers from waterways, wetlands, and springs;
- (c) Use of native plant species to absorb and filter contaminants; including riparian and wetland establishment and the use of planted swales; and
- (d) Monitoring requirements to enable assessment of the effects of the activity.

Controls on land use activities to protect water quality

WM6.16 To require, in the first instance, that all potential contaminants that may enter the water (e.g. nutrients, sediments and chemicals) are managed on site and at source rather than discharged off site. This applies to both rural and urban activities.

WM6.17 To require the development of stringent and enforceable controls on the following activities given the risk to water quality:

- (a) Subdivision and development adjacent to waterways;
- (b) Discharge to land activities associated with industry; and
- (c) Activities in the bed and margins of waterways, including gravel extraction.

UNNATURAL MIXING OF WATER

WM10.1 In principle, the unnatural mixing of water from different sources between or within catchments is culturally inappropriate.

WM10.2 Water infrastructure proposals that will result in the unnatural mixing of waters will be assessed by Papatipu Rūnanga on a case by case basis, allowing for consideration of:

- (a) The varying perspectives of different hapū to the unnatural mixing of waters in their takiwā;
- (b) The current state of water quality, water quantity, indigenous biodiversity and other cultural values within particular waterways; and
- (c) Different mixing scenarios, including provisions to avoid or mitigate cultural issues and/or provide cultural benefit.

ACTIVITIES IN THE BEDS AND MARGINS OF RIVERS AND LAKES

Riparian areas

WM12.2 To require the protection and restoration of native riparian vegetation along waterways and lakes in the takiwā as a matter of priority, and to ensure that this can occur as a permitted activity.

Use and enhancement of river margins in the built/ urban environment

WM12.4 All waterways in the urban and built environment must have indigenous vegetated healthy, functioning riparian margins.

WM12.5 To require that all waterways in the urban and built environment have buffers or setback areas from residential, commercial, or other urban activity that are:

- (a) At least 10 metres, and up to 30 metres; and
- (b) Up to 50 metres where the space, such as towards river mouths and in greenfield areas.

WM12.6 In the urban environment, it is accepted that waterways may have existing exotic vegetation along margins (e.g. exotic specimen trees in waterside reserves). However, the objective is still to promote native riparian vegetation, as taonga valued for flood control, the maintenance of water quality, mahinga kai and cultural wellbeing.

Structures in the beds and margins of waterways

WM12.13 To require that any structure, essential or otherwise, in the bed or margin of a waterway (e.g. floodgate) supports and enables passage for migratory indigenous fish species and does not compromise any associated kōhanga.

WETLANDS, WAIPUNA AND RIPARIAN MARGINS

WM13.1 To recognise and protect all wetlands, waipuna and riparian areas as wāhi taonga that provide important cultural and environmental benefits, including but not limited to:

- (a) Mahinga kai habitat;
- (b) The provision of resources for cultural use;
- (c) Cultural well-being;
- (d) The maintenance and improvement of water quality; and
- (e) Natural flood protection.

WM13.2 To protect, restore, and enhance remaining wetlands, waipuna, and riparian areas by:

- (a) Maintaining accurate maps of existing wetlands, waipuna, and riparian margins;
- (b) Requiring that the drainage of existing wetlands or waipuna or the destruction of modification of existing native riparian areas be a prohibited activity;
- (c) Requiring the use of appropriate fencing, buffers, and setback area to protect wetlands, waipuna, and riparian areas from intensive land use, including stock access and irrigation;
- (d) Supporting initiatives to restore wetlands, waipuna, and riparian areas; and
- (e) Continuing to educate the wider community and landowners of the taonga value of these ecosystems.

Comment: *Tāngata whenua have a particular interest in the beds of lakes and rivers and their margins. River and lake beds and their margins may be significant for cultural use or for the presence of significant sites.*

5.4 PAPATŪĀNUKU

SUBDIVISION AND DEVELOPMENT

Processes

P4.1 To work with local authorities to ensure a consistent approach to the identification and consideration of Ngāi Tahu interests in subdivision and development activities, including:

- (a) Encouraging developers to engage with Papatipu Rūnanga in the early stages of development planning to identify potential cultural issues; including the preparation of Cultural Impact Assessment reports;
- (b) Ensuring engagement with Papatipu Rūnanga at the Plan Change stage, where plan changes are required to enable subdivision;
- (c) Requiring that resource consent applications assess actual and potential effects on tāngata whenua values and associations;
- (d) Ensuring that effects on tāngata whenua values are avoided, remedied or mitigated using culturally appropriate methods;
- (e) Ensuring that subdivision consents are applied for and evaluated alongside associated land use and discharge consents; and
- (f) Requiring that 'add ons' to existing subdivisions are assessed against the policies in this section.

Basic principles and guidelines

P4.3 To base tāngata whenua assessments and advice for subdivision and residential land development proposals on a series of principles and guidelines associated with key issues of importance concerning such activities, as per Ngāi Tahu subdivision and development guidelines.

STORMWATER

P6.1 To require **on-site** solutions to stormwater management in all new urban, commercial, industrial, and rural developments (zero stormwater discharge off site) based on a multi-tiered approach to stormwater management:

- (a) Education- engaging greater general public awareness of stormwater and its interaction with the natural environment, encouraging them to take the steps to protect their local environment and perhaps re-use stormwater where appropriate;
- (b) Reduce volume entering system - implementing measures that reduce the volume of stormwater requiring treatment (e.g. rainwater collection tanks);
- (c) Reduce contaminants and sediments entering system – maximising opportunities to reduce contaminants entering stormwater e.g. oil collection pits in carparks, education of residents, treat the water, methods to improve quality; and
- (d) Discharge to land-based methods, including swales, stormwater basins, retention basins, and constructed wet ponds and wetlands (environmental infrastructure), using appropriate native plant species, recognising the ability of particular species to absorb water and filter waste.

- P6.2** To oppose the use of existing natural waterways and wetlands, and drains, for the treatment and discharge of stormwater in both urban and rural environments.
- P6.3** Stormwater should not enter the wastewater reticulation system in existing urban environments.
- P6.4** To require that the incremental and cumulative effects of stormwater discharge are recognised and provided for in local authority planning and assessments.
- P6.6** To oppose the use of global consents for stormwater discharges.

DISCHARGE TO LAND

- P8.1** To require that discharge to land activities in the takiwā:
- (a) Are appropriate to the soil type and slope, and the assimilative capacity of the land on which the discharge activity occurs;
 - (b) Avoid over-saturation and therefore the contamination of soil, and/or run off and leaching; and
 - (c) Are accompanied by regular testing and monitoring of one or all of the following soil, foliage, groundwater, and surface water in the area.
- P8.2** In the event that the accumulation of contaminants in the soil is such that the mauri of the soil resource is compromised, then the discharge activity must change or cease as a matter of priority.

SOIL CONSERVATION

- P9.1** To sustain and safeguard the life supporting capacity of soils, mō tātou, ā, mō kā uri ā muri ake nei.
- P9.2** To require the appropriate valuation of soil resources as taonga and as natural capital, providing essential ecosystem services.
- P9.3** To protect the land from induced soil erosion as a result of unsustainable land use and development.

CONTAMINATED LAND

- P10.1** The management of contaminated land must recognise and provide for specific cultural issues, including:
- (a) The location of contaminated sites;
 - (b) The nature of the contamination;
 - (c) The potential for leaching and run-off;
 - (d) Proposed land-use changes; and
 - (e) Proposed remediation or mitigation work.
- P10.2** To require appropriate and meaningful information sharing between management agencies and tāngata whenua on issues associated with contaminated sites.

EARTHWORKS

- P11.1** To assess proposals for earthworks with particular regard to:
- (a) Potential effects on wāhi tapu and wāhi taonga, known and unknown;
 - (b) Potential effects on waterways, wetlands and waipuna;
 - (c) Potential effects on indigenous biodiversity;
 - (d) Potential effects on natural landforms and features, including ridge lines;
 - (e) Proposed erosion and sediment control measures; and
 - (f) Rehabilitation and remediation plans following earthworks.

Risk of damage of modification to sites of significance

- P11.2** To require that tāngata whenua are able to identify particular areas whereby earthworks activities are classified as a restricted discretionary activity, with Ngāi Tahu values as a matter of discretion.
- P11.3** To use the methods identified in Section 5.8 Policy CL4.6 (Wāhi tapu me wāhi taonga) where an earthworks activity is identified by tāngata whenua as having actual or potential adverse effects on known or unknown sites of significance.

Erosion and sediment control

- P11.9** To require stringent and enforceable controls on land use and earthworks activities as part of the resource consent process, to protect waterways and waterbodies from sedimentation, including but not limited to:
- (a) The use of buffer zones;
 - (b) Minimising the extent of land cleared and left bare at any given time; and
 - (c) Capture of run-off, and sediment control.

Comment: *Land use and development activities in the takiwā must be managed in way that works with the land and not against it. While subdivision and residential land development activities can have adverse effects on cultural values, they can also provide cultural benefits, including opportunities to re affirm connections between tāngata whenua and place.*

5.5 TĀNE MAHUTA

INDIGENOUS BIODIVERSITY

- TM2.2** To recognise Te Tiriti o Waitangi as the basis for the relationship between central and local government and tāngata whenua with regard to managing indigenous biodiversity, as per duty of active protection of Māori interests and the principle of partnership.

Integrating indigenous biodiversity into the landscape

- TM2.8** To require the integration of robust biodiversity objectives in urban, rural land use and planning, including but not limited to:
- (a) Indigenous species in shelter belts on farms;
 - (b) Use of indigenous plantings as buffers around activities such as silage pits, effluent ponds, oxidation ponds, and industrial sites;
 - (c) Use of indigenous species as street trees in residential developments, and in parks and reserves and other open space; and
 - (d) Establishment of planted indigenous riparian margins along waterways.

RESTORATION OF INDIGENOUS BIODIVERSITY

- TM3.1** To approach restoration of indigenous biodiversity in the takiwā based on the following principles:
- (a) Restoration of indigenous biodiversity is about restoring original and natural landscapes, and therefore the mauri of the land; and
 - (b) Restoration of indigenous biodiversity is about restoring the relationship of Ngāi Tahu to important places and resources; including planning for customary use.

TM3.2 To advocate for an approach to restorations based on ‘*working with the land rather than against it*’, including but not limited to:

- (a) Establishment of long term, intergenerational vision, and objectives (50 and 100 years ahead); and
- (b) Use of natural succession and staged re-planting rather than spraying and burning (e.g. natural succession of indigenous species into areas of gorse and broom; staged underplanting of natives into wetland and lagoon areas full of willow).

Comment: *Ngāi Tahu has a particular interest in indigenous biodiversity, both for its inherent value on the landscape and the ecosystem services it provides, and with regard to mahinga kai. The protection and enhancement of indigenous biodiversity and mahinga kai underpins many of the issues and policies in the Mahaanui IMP.*

5.8 NGĀ TŪTOHU WHENUA

RECOGNISING CULTURAL LANDSCAPES

Recognising cultural landscapes

CL1.1 To require that the local and central government recognise and provide for the ability of tāngata whenua to identify particular landscapes as significant cultural landscapes, reflecting:

- (a) Concentration, distribution, and nature of wāhi tapu and wāhi taonga;
- (b) Setting within which sites occur and significance of setting;
- (c) Significance with regard to association and relationship to place; and
- (d) Degree of risk/ threat.

CL1.4 To require that oral tradition and history is considered equally alongside documented evidence when determining the cultural landscape values associated with a particular area or site.

WĀHI TAPU ME WĀHI TAONGA

CL3.1 All taonga within the takiwā of Ngāi Tahu, accidental discovery or otherwise, belong to the Papatipu Rūnanga/ Te Rūnanga o Ngāi Tahu.

Protecting wāhi tapu and wāhi taonga

CL3.8 To require, where a proposal is assessed by tāngata whenua as having the potential to affect wāhi tapu or wāhi taonga, one or more of the following:

- (a) Low risk to sites:
 - i. Accidental discovery protocol (ADP).
- (a) High risk to sites:
 - i. Cultural Impact Assessment (CIA);
 - ii. Site visit;
 - iii. Archaeological assessment, by a person nominated by the Papatipu Rūnanga;
 - iv. Cultural monitoring to oversee excavation activity, record sites or information that may be revealed, and direct tikanga for handling cultural materials;

- v. Inductions for contractors undertaking earthworks;
- vi. Accidental discovery protocol agreements (ADP); and/or
- vii. Archaeological Authority from the New Zealand Historic Places Trust.

Comment: *As a planning tool, cultural landscapes are a culturally meaningful and effective framework for the identification, protection and management of sites and places of significance, the multiple values associated with those sites and places, and the relationship of tāngata whenua to them.*

5.1 Guidance to Moderate Impacts on Mana Whenua Values

The above policies from the Mahaanui Iwi Management Plan provide a framework for assessing the potential negative impacts of the proposed activity on Mana Whenua values and provide guidance on how these effects can be moderated.

Te Taumutu Rūnanga have a unique and abiding interest in the sustainable management of te taiao – the environment. Wai māori (freshwater) is a taonga of Ngāi Tahu, governed under the domain of rangatiratanga and defined by Ngāi Tahu tikanga and ritenga. The Hurutini (Halswell) River runs through the middle of the site, Nottingham Stream runs along the boundary of a portion of the site and another waterway connecting to Sabys Road runs through part of the site. Both of these smaller waterways are tributaries to the Hurutini, which is a culturally significant waterway to Te Taumutu Rūnanga.

The Hurutini River and its tributaries are significant to Te Taumutu Rūnanga and kaitiaki would like to undertake a site visit to see the ground truthing of setback margins provided by the applicant in their development plans. River and lake beds and their margins may be significant for cultural use (e.g. mahinga kai) or for the presence of significant sites. Kaitiaki have indicated that the setback margins are not sufficient for this site and should be at least 10 m. Additionally, the consent holder must not create new impervious surfaces within the waterway setback of 20 m along the Hurutini (Halswell) River.

Kaitiaki state that this location is at risk of flooding and have requested that a Cultural Impact Assessment (CIA) is undertaken as part of the substantive application for this proposal due to the high risk of flooding at this site, in line with policies P4.1 and CL3.8 of the Mahaanui IMP. They have requested that Mahaanui facilitate this work and engage the applicant and a suitably qualified practitioner of their choice.

Air, water, and soil are taonga; they provide a vast array of essential ecosystem services. Although these services are often taken for granted, they have immense value to cultural, social, and economic wellbeing. Erosion and sediment control is a key issue of concern when undertaking any earthworks. Activities such as residential land development can leave large areas of land cleared with bare soil exposed, increasing the risk of erosion and the discharge of sediment into waterways, harbours or the sea. Recommendation 2 is provided to ensure appropriate erosion and sediment control measures.

Measures must be taken to avoid spills of fuel or any other hazardous substances within the site, given the number of waterways on site and likely shallow groundwater level. As per IMP policy section P9, soil conservation is critical due to the true (and non-replaceable) value of our soils. Recommendation 6 is provided to ensure appropriate mitigation and management strategies for spills that occur on site.

The values associated with particular cultural landscapes are indicators of what tāngata whenua value most about the land. Any activity that involves land disturbance has the potential to uncover or damage previously unrecorded Māori artefacts or taonga. To ensure the protection of taonga and Māori archaeological sites, an Accidental Discovery Protocol (*Appendix 1*) should be in place during all future earthwork activities required. This protocol outlines the procedures to be followed if culturally sensitive material is uncovered.

Subdivision and development can have significant effects on tāngata whenua values, including sense of place, cultural identity, indigenous biodiversity, mahinga kai, and wāhi tapu and wāhi taonga, but can also present opportunities to enhance those values. A cultural landscape approach is used by Papatipu Rūnanga to identify and protect tāngata whenua values and interests from the effects of subdivision, land use change and development. The development should align with the Ngāi Tahu Subdivision and Development Guidelines (*Appendix 2*) and incorporate sustainable urban design features, particularly with respect to stormwater runoff and greywater reuse, as outlined in recommendations 4 and 5, as well as recommendation 7 to ensure best practice treatment of stormwater before discharge.

‘Taonga species’ in the Mahaanui Kurataiao Iwi Management Plan (IMP) refer to species of flora and fauna that are significant to the culture and identity of iwi or hapū - for example, because there is a body of inherited knowledge relating to them, they are related to the iwi or hapū by whakapapa, and the iwi or hapū is obliged to act as their kaitiaki. This definition includes, but is not limited to, those species identified as Taonga species in the NTCSA 1998. A survey for indigenous flora and fauna (taonga species including lizards, birds etc) must be undertaken. If located, a relocation plan must be developed and habitats should be enhanced. Kaitiaki are concerned about the ongoing impact of urbanisation on these species in the takiwā. Recommendations 12 and 13 are also provided to ensure protection of fish species if diversion of the Hurutini River is required.

Indigenous biodiversity, landscapes and ecosystems, are a fundamental part of the culture, identity and heritage of Ngāi Tahu. Indigenous vegetation provides a range of benefits such as increasing indigenous habitat throughout the takiwā, binding/stabilising soil, nutrient uptake, and carbon sequestration – all of which help support a healthy environment and enhance indigenous biodiversity values of a landscape. Recommendations 8, 9 and 10 are provided to ensure appropriate inclusion of indigenous vegetation throughout the development.

6.0 Rūnanga – Affected Party or Not

In terms of this response, Mahaanui Kurataiao has attempted to address matters of fundamental concern to Te Taumutu Rūnanga. The fact that Mahaanui Kurataiao has not commented on any particular matter should not be taken as support thereof and Te Taumutu Rūnanga reserves the right to comment on additional matters in a future stage of engagement or when more information becomes available.

The Kaitiaki representatives of Te Taumutu Rūnanga have reviewed this application and provided the recommendations outlined in Section 7.0 to align this proposal more closely with the provisions in the Mahaanui IMP.

7.0 Recommendations and Feedback

The following recommendations should be considered to moderate effects of this proposed activity on mana whenua values:

General

1. An Accidental Discovery Protocol (ADP) should be in place during all earthworks required to exercise this consent to deal with archaeological finds and protect the interests of mana whenua. This condition does not constitute a response under the Heritage New Zealand Pouhere Taonga Act (HNZPT 2014).
2. An Erosion and Sediment Control Plan for any earthworks required to give effect to this consent should be prepared, implemented, inspected, and maintained in accordance with Environment Canterbury's *Erosion and Sediment Control Toolbox* for Canterbury until such time the site is stabilised.
 - a. Erosion and sediment control measures should effectively minimise sediment in stormwater discharged during the construction phase.
 - b. If the erosion and sediment controls prove to be inadequate, works should cease until appropriate and effective measures are in place.
3. A Cultural Impact Assessment (CIA) must be undertaken as part of the fast track process for this site due to the high risk of flooding. This must be undertaken by a suitably qualified individual selected by Te Taumutu Rūnanga.
4. The future development of the lots should align with the *Ngāi Tahu Subdivision and Development Guidelines*.
5. The consent holder should incorporate the *Ngāi Tahu Subdivision and Development Guidelines* to the greatest practical extent. The site should incorporate sustainable urban design features with respect to stormwater runoff and greywater reuse including:
 - a. Greywater capture and reuse.
 - b. Rainwater capture and reuse (i.e., rainwater collection tanks).
 - c. Minimising impervious cover (e.g., using permeable paving and maintaining grass cover).
 - d. The use of rain gardens and swales (or other land-based methods) planted with appropriate native species, rather than standard curb and channel.

- e. Avoiding the use of building material known to generate contaminants such as copper guttering and roofing.
6. Measures must be taken to avoid spills of fuel or any other hazardous substances within the site. These measures shall include:
- a. Refuelling of machinery and vehicles must not occur within 20 metres of:
 - i. Open excavations;
 - ii. Exposed groundwater;
 - iii. Surface water bodies; or
 - iv. Stormwater devices.
 - b. Storing fuel securely or removing fuel from site overnight.
 - c. A spill kit must be kept on site that is capable of absorbing the quantity of oil and petroleum products that may be spilt on site at any one time, remains on site at all times.
 - d. In the event of a spill of fuel or any other hazardous substance, the spill must be cleaned up as soon as practicable, the area must be inspected and cleaned, and measures taken to prevent a recurrence.

Stormwater

7. Stormwater should be treated before discharge, including a minimum of first flush treatment and heavy metal treatment.

Ecology

8. Indigenous planting is required to enhance the cultural landscape, increase indigenous habitat, filter sediment and sequester carbon.
- a. Riparian planting should enhance ecological values of the waterway
 - b. Plants that mature to a height of at least the width of the waterways should be provided.
9. Indigenous plants should be incorporated into development plans, consistent with the restoration and enhancement of indigenous biodiversity on the landscape.
- a. For example, indigenous species should be used for street trees, open space and reserves, ground cover for swales, stormwater management network, and home gardens.
10. Indigenous species used in planting and landscaping should be appropriate to the local environment and sourced from local seed supplies.
11. The consent holder must not create new impervious surfaces within the waterway setback of 20m along the Hurutini (Halswell) River.
12. Fish salvage by a suitably qualified fish expert must be undertaken prior to diverting the water race into pipes.

13. The diversion of water must not prevent fish passage or cause the stranding of fish in pools or channels.
14. A survey for indigenous flora and fauna (taonga species including lizards, birds etc) must be undertaken. If located, a relocation plan must be developed and habitats should be enhanced.
15. A minimum setback of 10m from all waterways must be adhered to for all construction and development on site.

Comments:

- Kaitiaki believe that this location is at risk of flooding and have requested that a CIA is undertaken for this application as part of the substantive application. They have requested that Mahaanui facilitate this work and engage the applicant and a suitably qualified practitioner of their choice, in line with policies P4.1 and CL3.8.
- Kaitiaki also mentioned that they would like to see ground truthing of the proposed waterway setback margins and have indicated that the setback margins are not enough for this location. A site visit can be arranged via correspondence with Mahaanui Kurataiao.

On behalf of Mahaanui Kurataiao Ltd, this report has been prepared by Tayla Spencer | Mahaanui Kurataiao Ltd Pou Taiao, and peer reviewed by Angela Burton | Mahaanui Kurataiao Ltd Pou Arataki - Mātārauemi.

Date: 17 April 2026

This information is provided in good faith for the purpose of engagement on this Fast Track pre-application advice. Parts of this information is sensitive and is shared only to provide context for decision matters. Should a request for information be received by the Council under the Local Government Official Information and Meetings Act 1987 in relation to this information, it is requested that it is withheld in full or in part (in consultation with rūnanga) under section 7(2)(ba) of the Local Government Official Information and Meetings Act 1987.

Appendix 1: Accidental Discovery Protocol (ADP)

PRIOR TO COMMENCEMENT OF ANY WORKS, A COPY OF THIS ADP SHOULD BE MADE AVAILABLE TO ALL CONTRACTORS WORKING ON SITE.

Purpose

This Accidental Discovery Protocol (ADP) sets out the procedures that must be followed in the event that taonga (Māori artefacts), burial sites/kōiwi (human remains), or Māori archaeological sites are accidentally discovered. The Protocol is provided by Te Taumutu Rūnanga. Te Taumutu Rūnanga is the representative body of the tangata whenua who hold mana whenua in the proposed area.

Background

Land use activities involving earthworks have the potential to disturb material of cultural significance to tangata whenua. In all cases such material will be a taonga, and in some cases such material will also be tapu. Accidental discoveries may be indicators of additional sites in the area. They require appropriate care and protection, including being retrieved and handled with the correct Māori tikanga (protocol).

Under the *Heritage New Zealand Pouhere Taonga Act 2014*, an archaeological site is defined as any place associated with pre-1900 human activity, where there is material evidence relating to the history of New Zealand. It is unlawful for any person to destroy, damage or modify the whole or any part of an archaeological site (known or unknown) without the prior authority of the Heritage New Zealand Pouhere Taonga (HNZPT). This is the case regardless of the legal status of the land on which the site is located, whether the activity is permitted under the District or Regional Plan or whether a resource or building consent has been granted. The HNZPT is the statutory authority for archaeology in New Zealand.

Note that this ADP does not fulfil legal obligations under the Heritage New Zealand Pouhere Taonga Act 2014 regarding non-Māori archaeology. Please contact the HNZPT for further advice.

Immediately following the discovery of material suspected to be a taonga, kōiwi or Māori archaeological site, the following steps shall be taken:

1. All work on the site will cease immediately.
2. Immediate steps will be taken to secure the site to ensure the archaeological material is not further disturbed.
3. The contractor/works supervisor/owner will notify the Kaitiaki Rūnanga and the Area Archaeologist of the HNZPT. In the case of kōiwi (human remains), the New Zealand Police must be notified.
4. The Kaitiaki Rūnanga and HNZPT will jointly appoint/advise a qualified archaeologist who will confirm the nature of the accidentally discovered material.

5. If the material is confirmed as being archaeological, the contractor/works supervisor/owner will ensure that an archaeological assessment is carried out by a qualified archaeologist, and if appropriate, an archaeological authority is obtained from HNZPT before work resumes (as per the *Heritage New Zealand Pouhere Taonga Act 2014*).
6. The contractor/works supervisor/owner will also consult the Kaitiaki Rūnanga on any matters of tikanga (protocol) that are required in relation to the discovery and prior to the commencement of any investigation.
7. If kōiwi (human remains) are uncovered, in addition to the steps above, the area must be treated with utmost discretion and respect, and the kōiwi dealt with according to both law and tikanga, as guided by the Kaitiaki Rūnanga.
8. Works in the site area shall not recommence until authorised by the Kaitiaki Rūnanga, the HNZPT (and the NZ Police in the case of kōiwi) and any other authority with statutory responsibility, to ensure that all statutory and cultural requirements have been met.
9. All parties will work towards work recommencing in the shortest possible time frame while ensuring that any archaeological sites discovered are protected until as much information as practicable is gained and a decision regarding their appropriate management is made, including obtaining an archaeological authority under the *Heritage New Zealand Pouhere Taonga Act 2014* if necessary. Appropriate management may include recording or removal of archaeological material.
10. Although bound to uphold the requirements of the Protected Objects Act 1975, the contractor/works supervisor/owner recognises the relationship between Ngāi Tahu whānui, including its Kaitiaki Rūnanga, and any taonga (Māori artefacts) that may be discovered.

IN DOUBT, STOP AND ASK; TAKE A PHOTO AND SEND IT TO THE HNZPT ARCHAEOLOGIST

Contact Details

HNZPT Archaeologist: (03) 357 9615 archaeologistcw@heritage.org.nz

HNZPT Southern Regional Office (03) 357 9629 infosouthern@heritage.org.nz

HNZPT Māori Heritage Advisor (03) 357 9620 pouarahisouth@heritage.org.nz

Kaitiaki Rūnanga:

Te Taumutu Rūnanga: 03 371 2660, taumutu@ngaitahu.iwi.nz

Appendix 2: Ngāi Tahu Subdivision and Development Guidelines

Note: These guidelines are to be read in conjunction with Policies P4.1, P4.2 and P4.3 within the Mahaanui IMP.

Cultural landscapes

- 1.1 A cultural landscape approach is the most appropriate means to identify, assess and manage the potential effects of subdivision and development on cultural values and significant sites [refer Section 5.8 Issue CL1].
- 1.2 Subdivision and development that may impact on sites of significance is subject Ngāi Tahu policy on Wāhi tapu me wāhi taonga and Silent Files (Section 5.8, Issues CL3 and CL4).
- 1.3 Subdivision and development can provide opportunities to recognise Ngāi Tahu culture, history and identity associated with specific places, and affirm connections between tāngata whenua and place, including but not limited to:
 - (i) Protecting and enhancing sites of cultural value, including waterways;
 - (ii) Using traditional Ngāi Tahu names for street and neighbourhood names, or name for developments;
 - (iii) Use of indigenous species as street trees, in open space and reserves;
 - (iv) Landscaping design that reflects cultural perspectives, ideas, and materials;
 - (v) Inclusion of interpretation materials, communicating the history and significance of places, resources, and names to tāngata whenua; and
 - (vi) Use of tāngata whenua inspired and designed artwork and structures.

Stormwater

- 2.1 All new developments must have on-site solutions to stormwater management (i.e. zero stormwater discharge off site), based on a multi-tiered approach to stormwater management that utilises the natural ability of Papatūānuku to filter and cleanse stormwater and avoids the discharge of contaminated stormwater to water [refer to Section 5.4, Policy P6.1].
- 2.2 Stormwater swales, wetlands and retention basins are appropriate land-based stormwater management options. These must be planted with native species (not left as grass) that are appropriate to the specific use, recognising the ability of particular species to absorb water and filter waste.

- 2.3** Stormwater management systems can be designed to provide for multiple uses. For example, stormwater management infrastructure as part of an open space network can provide amenity values, recreation, habitat for species that were once present on the site, and customary use.
- 2.4** Appropriate and effective measures must be identified and implemented to manage stormwater run-off during the construction phase, given the high sediment loads that stormwater may carry as a result of vegetation clearance and bare land.
- 2.5** Councils should require the upgrade and integration of existing stormwater discharges as part of stormwater management on land rezoned for development.
- 2.6** Developers should strive to enhance existing water quality standards in the catchment downstream of developments, through improved stormwater management.

Earthworks

- 3.1** Earthworks associated with subdivision and development are subject to the general policy on Earthworks (Section 5.4 Issue P11) and Wāhi tapu me wāhi taonga (Section 5.8, Issue CL3), including the specific methods used in high and low risk scenarios for accidental finds and damage to sites of significance.
- 3.2** The area of land cleared and left bare at any time during development should be kept to a minimum to reduce erosion, minimise stormwater run-off and protect waterways from sedimentation.
- 3.3** Earthworks should not modify or damage beds and margins of waterways, except where such activity is for the purpose of naturalisation or enhancement.
- 3.4** Excess soil from sites should be used as much as possible on site, as opposed to moving it off site. Excess soil can be used to create relief in reserves or buffer zones.

Water supply and use

- 4.1** New developments should incorporate measures to minimise pressure on existing water resources, community water supplies and infrastructure, including incentives or requirements for:
- (i) low water use appliances and low flush toilets;
 - (ii) grey water recycling; and
 - (iii) rainwater collection.
- 4.2** Where residential land development is proposed for an area with existing community water supply or infrastructure, the existing supply or infrastructure must be proven to be able to accommodate the increased population prior to the granting of subdivision consent.

4.3 Developments must recognise, and work to, existing limits on water supply. For example, where water supply is an issue, all new dwellings should be required to install rainwater collection systems.

Waste treatment and disposal

5.1 Developments should implement measures to reduce the volume of waste created within the development, including but not limited incentives or requirements for:

- (i) Low water use appliances and low flush toilets;
- (i) Grey water recycling; and
- (ii) Recycling and composting opportunities (e.g. supporting zero waste principles).

5.2 Where a development is proposed for an area with existing wastewater infrastructure, the infrastructure must be proven to be able to accommodate the increased population prior to the granting of the subdivision consent.

5.3 New rural residential or lifestyle block developments should connect to a reticulated sewage network if available.

5.4 Where new wastewater infrastructure is required for a development:

- (i) The preference is for community reticulated systems with local treatment and land-based discharge rather than individual septic tanks; and
- (ii) Where individual septic tanks are used, the preference is a wastewater treatment system rather than septic tanks.

Design guidelines

6.1 New developments should incorporate low impact urban design and sustainability options to reduce the development footprint on existing infrastructure and the environment, including sustainable housing design and low impact and self-sufficient solutions for water, waste, energy such as:

- (i) Position of houses to maximise passive solar gain;
- (ii) Rainwater collection and greywater recycling;
- (iii) Low energy and water use appliances;
- (iv) Insulation and double glazing; and
- (v) Use of solar energy generation for hot water.

- 6.2** Developers should provide incentives for homeowners to adopt sustainability and self-sufficient solutions as per 6.1 above.
- 6.3** Urban and landscape design should encourage and support a sense of community within developments, including the position of houses, appropriately designed fencing, sufficient open spaces, and provisions for community gardens.
- 6.4** Show homes within residential land developments can be used to showcase solar hot water, greywater recycling and other sustainability options, and raise the profile of low impact urban design options.

Landscaping and open space

- 7.1** Sufficient open space is essential to community and cultural wellbeing, and the realization of indigenous biodiversity objectives, and effective stormwater management.
- 7.2** Indigenous biodiversity objectives should be incorporated into development plans, consistent with the restoration and enhancement of indigenous biodiversity on the landscape.
- 7.3** Indigenous biodiversity objectives to include provisions to use indigenous species for:
- (i) street trees;
 - (ii) open space and reserves;
 - (iii) native ground cover species for swales;
 - (iv) stormwater management network; and
 - (v) home gardens.
- 7.4** Indigenous species used in planting and landscaping should be appropriate to the local environment, and where possible from locally sourced seed supplies.
- 7.5** Options and opportunities to incorporate cultural and/or mahinga kai themed gardens in open and reserve space can be considered in development planning (e.g. pā harakeke as a source of weaving materials; reserves planted with tree species such as mātai, kahikatea and tōtara could be established with the long-term view of having mature trees available for customary use).
- 7.6** Developers should offer incentives for homeowners to use native species in gardens, including the provision of lists of recommended plants to avoid, discounts at local nursery, and landscaping ideas using native species.

RE: Sabys 101 Limited and lodgement of a Referral Application

From Tayla Spencer <s 9(2)(a)>
Date Thu 2026-04-23 9:58 AM
To Kerstin Ghisel <s 9(2)(a)>

Kia ora Kerstin,

Regarding ground truthing, we just mean a site visit to look at the actual size and space of the waterway setbacks on the ground, this will be the same for the John Paterson site as well.

Regarding the CIA, I have checked in with our other kaimahi with more experience in this area and the following would likely be required, however as Taumutu have requested a specific person outside of Mahaanui to undertake this there may be things I am missing or other information that they require. They may also choose to contact you directly. Just to clarify we are also not asking that the CIA is undertaken before lodging your application, just that it is undertaken as part of the process. For a CIA, you will likely need a draft AEE, ecological assessment, hydrological and flood risk assessment, stormwater assessment and detail on earthworks including cut and fill as well as depth to groundwater.

Hopefully that is helpful, let me know if there are any further questions, very happy to keep in contact.

Ngā mihi,

Tayla Spencer (Cross) | (she/her)
Tangata Tiriti
Pou Taiao | Environmental Advisor
Mahaanui Kurataiao Ltd
226 Antigua Street, Christchurch NZ 8011
Mobile s 9(2)(a)
Email: 
Web: mahaanui.kurataiao.co.nz



From: Kerstin Ghisel <s 9(2)(a)>
Sent: Monday, 20 April 2026 9:52 a.m.
To: Tayla Spencer <s 9(2)(a)>
Subject: Re: Sabys 101 Limited and lodgement of a Referral Application

Caution: This is an EXTERNAL email. Please consider safe cyber security practices.

Kia ora Tayla,

I hope you had a great weekend. Thanks for sending through the preliminary advice — I really appreciate it.

I have a few points I'd like to clarify so I can better understand the recommendations before passing them on to the applicant.

Regarding the CIA, I understand this is due to the flood risk at the site. Could you please clarify what additional information would be required? I'm happy to liaise with our engineers, who are already assessing the flood risk in line with the district and regional plan requirements, as well as the NPS for natural hazards. It would also be helpful to know what type of additional specialist input you would expect in this context.

I was also hoping you could expand on what you mean by "ground truthing" the proposed waterway setbacks, as I'm not entirely clear on what this would involve.

Thanks again, and I look forward to your guidance.

Ngā mihi,
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate

s 9(2)(a)

barker.co.nz



B&A
Urban & Environmental



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From: Tayla Spencer s 9(2)(a)
Sent: 17 April 2026 3:34 PM
To: Kerstin Ghisel s 9(2)(a)
Subject: RE: Sabys 101 Limited and lodgement of a Referral Application

Kia ora Kerstin,

Thank you for sending this through, acknowledging that I have received it.

I also attach the preliminary mana whenua advice for this application site, arohamai it took me a bit longer to finalise as it is such a sensitive site. There are two reports as this is a joint takiwā area, they are slightly different recommendations from each rūnanga although very similar. Please reach out if you have any questions, as always happy to take a call.

Thank you for being so patient in working with me on this, enjoy your weekend!

Ngā mihi,

Tayla Spencer (Cross) | (she/her)
Tangata Tiriti
Pou Taiao | Environmental Advisor
Mahaanui Kurataiao Ltd
226 Antiqua Street, Christchurch NZ 8011
Mobile: s 9(2)(a)
Email: s 9(2)(a)
Web: mahaanuiKurataiao.co.nz



From: Kerstin Ghisel s 9(2)(a)
Sent: Wednesday, 15 April 2026 4:14 p.m.
To: Tayla Spencer s 9(2)(a)
Subject: Sabys 101 Limited and lodgement of a Referral Application

Caution: This is an EXTERNAL email. Please consider safe cyber security practices.

Hello Tayla

Sabys 101 Limited wishes to formally notify Ngai Tahu that Sabys 101 Limited will be lodging a referral application under the Fast-track Approvals Act 2024 ("FTAA") for the Franco Farms development ("the Project"). The Project will establish:

- approximately 348 residential lots and associated residential units.
- A neighbourhood centre (approximately 2,115m²) to provide for the future resident's day to day needs located adjacent to Sabys Road.
- A new reserve and enhanced riparian margin adjacent to Knights Stream, the Halswell River and the Creamery Drain.
- The proposal incorporates an integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve (approximately 2,236m²) and stormwater basins with associated wetland areas (approximately 5.6ha) to the south of the application site.
- Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure.

Sabys 101 considers that the Project is a development project that would have significant regional benefits, and that referring the project into the FTAA regime will facilitate the project and is unlikely to materially affect the efficient operation of the approvals process, and is clearly aligned with section 22(1) of the FTAA.

As you are aware, Sabys 101 Limited has already commenced consultation with Ngai Tahu via both Mahaanui Kurataiao Limited and Whitiara Centre Limited for this Project, including attending meetings held recently in March to discuss the proposal, along with various email correspondence. We thank you for your time in participating in these sessions and for the feedback.

Approvals

A referral application must specify all the approvals that are proposed to be applied for under the fast-track approvals process under the FTAA. The following approvals will be required:

- Schedule 5 approvals relating to the Resource Management Act 1991 ("the RMA"); and
- Schedule 7 approvals relating to the Wildlife Act 1953 ("Wildlife Act")
- Schedule 8 approvals relating to Heritage New Zealand Pouhere Taonga Act 2014 ("HNZ Act")

The FTAA as amended on 31 March 2026 requires the following prior to lodging a referral application with the EPA:

- Consultation requirements in section 11(1)(a), which are not relevant to the Project; and
- Written notification to (relevantly) the relevant local authorities, any relevant iwi authorities, hapū, and Treaty settlement entities, and the relevant administering agencies.

In accordance with section 11 of the FTAA, Sabys 101 Limited gives notice that it intends to lodge a referral application for the Project. It will not file its referral application for 20 working days following the date of this email in order to provide Ngai Tahu via both Mahaanui Kurataiao Limited and Whitiara Centre Limited the opportunity to respond to this notice.

Project description

The Project is located at Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573) and 6 Wrooths Road.
I **attach** a current (draft and tentative) scheme plan in order to give you a better understanding of the Project details.

If you have any questions, please get in touch, and I look forward to hearing from you in respect of this notice.
Thanks,
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate
s 9(2)(a)

PO Box 1749,
Christchurch 8140
Level 3, 61 Cambridge
Terrace,
Christchurch Central
City, Christchurch
8013

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Project: Sabys / Candys Block – Discussion with Mahaanui

Date: 11 March 2026

Time: 1:00 pm – 2:00 pm

Location: Online

Attendees:

Name	Role/Organisation
Tayla Spencer	Mahaanui Kurataiao Ltd – Environmental Consultant
Brent Trumper	Sabys 101 Limited
Kerstin Ghisel	B&A – Senior Associates
Maisie Fisher	B&A – Intermediate Planner

Item	Detail	Action
1	Introductions and overview from Kerstin - Site location and neighbouring subdivision - Investigating a fast track instead of a private plan change	
2	Early engagement with Mahaanui due to scale of the development, relevant features to iwi may include (but not limited to): - Rivers and waterways - Damming and pumping - Geotechnical matters - Riparian setbacks and planting and esplanade reserves - Opening up public access into that area - Improving stormwater quality (hoping to discharge under the CCC global consent, but due to the split district zoning then we may need to go for a new consent here) - Dewatering due to maximum depths of excavation, would likely be discharged into the adjacent waterways (this mimics the approach taken on other sites around the region). Depth of excavation would likely not exceed 2m (estimate at this stage). Really wanting to start the conversation early.	
3	Comments from Tayla: Great to be included early, some matters that will be particularly relevant.	Send Tayla the draft ecological report for context/further detail.

Item	Detail	Action
	- Temporary damming may require a stream survey to determine wildlife present. If fish are present, then ecologist would need to be present to manage wildlife etc. - Mahaanui in other fast-track situations have provided a whole range of conditions, then when the application comes through the fast-track process then the applicant can detail whether they can meet (or not) the conditions. Then we can discuss in more detail at a later date.	
4	Kerstin asking around Mahaanui areas to ensure we aren't missing any consultation.	Whitiora is another entity that may or may not want to be involved in this application.
5	Iwi management plan assessment – latest version available is the one that is available online.	
6	Any other considerations from Mahaanui: - Stormwater reserve located at 6 Wroots Road – need to work with the engineer to determine the best approach to getting the water from the top of the site to the reserve and past the river (either over or under). This is an engineering matter/complexity that needs to be resolved. - Temporary diversion of the waterway to install the pipe work could be an alternative pathway. Tayla said the temporary diversion of the water way could be an option from their perspective (has been approved in the past) but would be a case-by-case situation. - Preference from Mahaanui would likely be to not trench the stormwater under the waterway, but noting if this is the only way this can be dealt with it could be managed through draft conditions. - Damming would result in more conditions than a temporary diversion from Runanga, trenching is not looked at very favourably. - Discussions with heritage NZ, they flagged that Mahaanui might have any Māori archaeological information that we may need to consider. - Tayla to investigate and will include this in report. - Treaty claims – is the site subject to any. - Land is not subject to any treaty claims - River and 20m riparian margin on either side is	Mahaanui report will include comment on: - Māori archaeological information - Treaty claims

Item	Detail	Action
	- Site not recognised as a silent file on the regional planning maps. - Wastewater disposal – hook into the CCC disposal network. May involve separate pipework because of capacity constraints. No plans, so far, for onsite treatment. If CCC are not entertaining the reticulated network, then onsite disposal may be required. Can revisit this later depending on the pathway. - Potable water – reticulated.	
7	Conditions: - Standard conditions to be expected - Stream diversion conditions depending on approach	
8	Timeframes: Aiming for end of April to get referral application in.	Mahaanui advice can be shared before then.

Whitiora Centre Limited



Urban & Environmental

Sabys 101 Limited and lodgement of a Referral Application

From Kerstin Ghisel s 9(2)(a)
Date Wed 2026-04-15 4:15 PM
To Ruiha Johnson s 9(2)(a)

📎 1 attachment (3 MB)

SabysCandyBlock_Lot_Plans_24.03.2026.pdf;

Hello Ruiha,

Sabys 101 Limited wishes to formally notify Ngai Tahu that Sabys 101 Limited will be lodging a referral application under the Fast-track Approvals Act 2024 ("FTAA") for the Franco Farms development ("the Project"). The Project will establish:

- approximately 348 residential lots and associated residential units.
- A neighbourhood centre (approximately 2,115m²) to provide for the future resident's day to day needs located adjacent to Sabys Road.
- A new reserve and enhanced riparian margin adjacent to Knights Stream, the Halswell River and the Creamery Drain.
- The proposal incorporates an integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve (approximately 2,236m²) and stormwater basins with associated wetland areas (approximately 5.6ha) to the south of the application site.
- Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure.

Sabys 101 considers that the Project is a development project that would have significant regional benefits, and that referring the project into the FTAA regime will facilitate the project and is unlikely to materially affect the efficient operation of the approvals process, and is clearly aligned with section 22(1) of the FTAA.

As you are aware, Sabys 101 Limited has already commenced consultation with Ngai Tahu via both Mahaanui Kurataiao Limited and Whitiara Centre Limited for this Project, including attending meetings held recently in March to discuss the proposal, along with various email correspondence. We thank you for your time in participating in these sessions and for the feedback.

Approvals

A referral application must specify all the approvals that are proposed to be applied for under the fast-track approvals process under the FTAA. The following approvals will be required:

- Schedule 5 approvals relating to the Resource Management Act 1991 ("the RMA"); and
- Schedule 7 approvals relating to the Wildlife Act 1953 ("Wildlife Act")
- Schedule 8 approvals relating to Heritage New Zealand Pouhere Taonga Act 2014 ("HNZ Act")

The FTAA as amended on 31 March 2026 requires the following prior to lodging a referral application with the EPA:

- Consultation requirements in section 11(1)(a), which are not relevant to the Project; and
- Written notification to (relevantly) the relevant local authorities, any relevant iwi authorities, hapū, and Treaty settlement entities, and the relevant administering agencies.

In accordance with section 11 of the FTAA, Sabys 101 Limited gives notice that it intends to lodge a referral application for the Project. It will not file its referral application for 20 working days following the date of this email in order to provide Ngai Tahu via both Mahaanui Kurataiao Limited and Whitiara Centre Limited the opportunity to respond to this notice.

Project description

The Project is located at Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573) and 6 Wroots Road. I **attach** a current (draft and tentative) scheme plan in order to give you a better understanding of the Project details.

If you have any questions, please get in touch, and I look forward to hearing from you in respect of this notice.
Thanks,
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate
s 9(2)(a)

PO Box 1749,
Christchurch 8140
Level 3, 61 Cambridge
Terrace,
Christchurch Central
City, Christchurch
8013



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Whitiora Response - Candys/Sabys Rd Fats Track

From Ruiha Johnson s 9(2)(a)
Date Fri 2026-03-20 2:42 PM
To Kerstin Ghisel s 9(2)(a)

Kia ora Kerstin,

Thanks for reaching out to Whitiora and making time to meet with me earlier in the week. Whitiora do appreciate pre-application engagement on projects such as this.

As discussed, I've looked at the initial scheme design and checked the location against our maps. Based on the location, site characteristics and nature of works we would be happy to wait until a referral application is lodged to undertake a full review. Cost recovery for our time could then be covered by the set fee as per the Fast Track Act.

A main point of interest for us would be how the development interacts with surface water bodies. It is Whitiora's position that surface water bodies should not form site boundaries. An issue arises where future landowners seek resource consents to encroach into district plan waterway setbacks when optimising their own on-site building. It is Whitiora's view that the size, alignment and layout of sections should not give rise to this scenario. To guarantee protection from encroachment the waterways should be planted on both sides and the setback be subject to some form of legal mechanism for protection.

Other matters of interest and concern to Ngāi Tūāhuriri Rūnanga also include:

- The management of earthworks including:
 - Run-off from exposed earthworks into waterways causing contaminants to enter the waterway;
 - Dust nuisance;
 - Accidental discovery of Māori artefacts or sites of pre-European origin.
- The availability and efficient use of water.
- Reticulation of wastewater.
- Stormwater management.
- Protection of surface waterbodies and the habitat they provide for fish and invertebrates.
- The use of indigenous and taonga species as part of landscape treatments.

Key things that we would like to see information on:

- The proposed stormwater management system;
- The proposed mechanism to protect waterway margins;
- The presence of fish within the water race and any recommendations from an ecologist on the management of fish during construction; and
- Confirmation on the presence of any springs within the site.

Let me know if you have any questions at this stage and let me know once you have a date confirmed to lodge the referral application.

Kā mihi

Ruiha Johnson

Enviromental Advisor
Whitiara Centre



s 9(2)(a)



351 Lincoln Road, Addington 8024



Te Runanga o Ngai Tahu (TroNT)



Urban & Environmental

16 April 2026

Response – Candys Road Residential Development

Kerstin Ghisel

B&A

s 9(2)(a)

On behalf of Sabys 101 Limited

Tēnā koe Kerstin

RESPONSE TO THE APPLICANT- Candys Road Residential Development (Referral Application under Fast Track Approvals Act 2024)

Te Rūnanga o Ngāi Tahu (**Te Rūnanga**) provides this response regarding your proposal for the **Candys Road Residential Development** under the Fast-Track Approvals Act 2024.

Based on the email dated 27 February 2026 with the attachment (Drawing H.20445), it is our understanding that you are in the initial stages of considering developing land at Candy's Road and lodge an application for referral under the FTAA.

The expectation of Te Rūnanga is that full consultation will occur with the relevant Papatipu Rūnanga (as outlined below) before the lodgement of any application. This includes access to detail information. This will also enable you to fill the requirements of section 13 (4) of the FTAA¹. Without sufficient information Te Rūnanga nor Papatipu Rūnanga are unable to provide a response.

Ngāi Tahu

Te Rūnanga is the statutorily recognised representative tribal body of Ngāi Tahu whānui (as provided by section 15 of the Te Rūnanga o Ngāi Tahu Act 1996 (**TRONT Act**)) and was established as a body corporate on 24 April 1996 under section 6 of the TRONT Act. Te Rūnanga encompasses 18 Papatipu Rūnanga, who uphold the mana whenua and mana moana of their rohe. Te Rūnanga is responsible for managing, advocating, and protecting, the rights and interests inherent to Ngāi Tahu as mana whenua. Notwithstanding its statutory status as the representative voice of Ngāi Tahu whānui "for all purposes", Te Rūnanga accepts and respects the right of individuals and Papatipu Rūnanga to provide their own responses.

Accordingly, while Te Rūnanga provides this overarching response, we emphasise that Papatipu Rūnanga are distinct treaty settlement entities in their own right, with their own mandates, responsibilities, cultural knowledge, and decision-making structures. Engagement with Te Rūnanga does not replace or diminish the requirement for you, as the applicant, to undertake robust, early, and meaningful consultation with each of the Papatipu Rūnanga whose takiwā and interests intersect with the project area and the wider environment.

Papatipu Rūnanga who have shared interests across the Halswell area are collectively referred to in this response as 'Ngā Rūnanga' are:

¹ As per changes to take effect 31 March 2026.

Te Ngāi Tūāhuriri Rūnanga	The takiwā of Ngāi Tūāhuriri Rūnanga centres on Tuahiwi and extends from the Hurunui to Hakatere, sharing an interest with Arowhenua Rūnanga northwards to Rakaia, and thence inland to the Main Divide.
Rāpaki Rūnanga	The takiwā of Rāpaki Rūnanga centres on Rāpaki and includes the catchment of Whakaraupo and Te Kaituna.
Te Taumutu Rūnanga	The takiwā of Taumutu Rūnanga centres on Taumutu and the waters of Te Waihora and adjoining lands and shares a common interest with Te Ngāi Tūāhuriri Rūnanga and Te Rūnanga o Arowhenua in the area south to Hakatere.

The contact details for each Papatipu Rūnanga within the project area are below. For some Papatipu Rūnanga the initial contact is to be through their Regional Environmental Entities:

Rūnanga	Regional Environmental Entity (REE)
Te Hapū o Ngāti Wheke (Rāpaki)	Mahaanui Kurataiao (MKT) Mahaanui.admin@ngaitahu.iwi.nz
Ngāi Tūāhuriri	Whitiora s 9(2)(a)
Te Taumutu	Te Taumutu Rūnanga Taumutu@ngaitahu.iwi.nz Mahaanui.admin@ngaitahu.iwi.nz

Te Rūnanga o Ngāi Tahu engagement

Te Rūnanga acknowledges that Sabys 101 Limited has begun consultation with Te Rūnanga. For clarification, the claims area and Treaty Settlement Provisions that shape this response have been summarised in the appendices. The initial comments on the proposal are:

- Te Rūnanga, will not consider consultation complete until Papatipu Rūnanga have also been engaged and the results of that engagement are known.
- Based in the draft plan attached there appear to be no spatially defined settlement mechanisms within the immediate vicinity of the location potentially impacted by the proposed development. However as outlined below, there may be a tribal settlement property impacted downstream of the proposed development. Te Rūnanga is concerned about how the project will protect Taonga Species or enhance mahinga kai given that several waterbodies are within the development area. The Halswell River which runs through the development is within the Te Waihora Cultural Landscape/Values Management Area planning overlay in the Canterbury Land and Water Regional Plan. This waterbodies within the development feed into Te Waihora/Lake Ellesmere, a tribal settlement property and taonga.

This response is provided without prejudice to:

- Legal action Ngāi Tahu and its Papatipu Rūnanga are currently undertaking, or any other claims or allegations made, against the Crown.²

Any existing arrangements by Papatipu Rūnanga regarding how they may or may not be involved in the development of this application. It is the exception of Te Rūnanga that mana whenua input will continue to be sought to the extent and in a manner that each Papatipu Rūnanga has indicated they wish to be involved.

Based on the limited information provided, and provided engagement occurs with Papatipu Rūnanga, it is unlikely that further engagement is required with Te Rūnanga. However, this may change if further information, including the concerns expressed above, indicate that Treaty settlement mechanisms are potentially impacted by the proposal or further engagement with Te Rūnanga is required.

Ngā mihi



Maru Rout
Programme Leader – Mauri
Te Rūnanga o Ngāi Tahu

Address for Service:

Rachael Pull

Senior Environmental Advisor– Te Ao Tūroa

Email: s 9(2)(a)

Phone: s 9(2)(a)

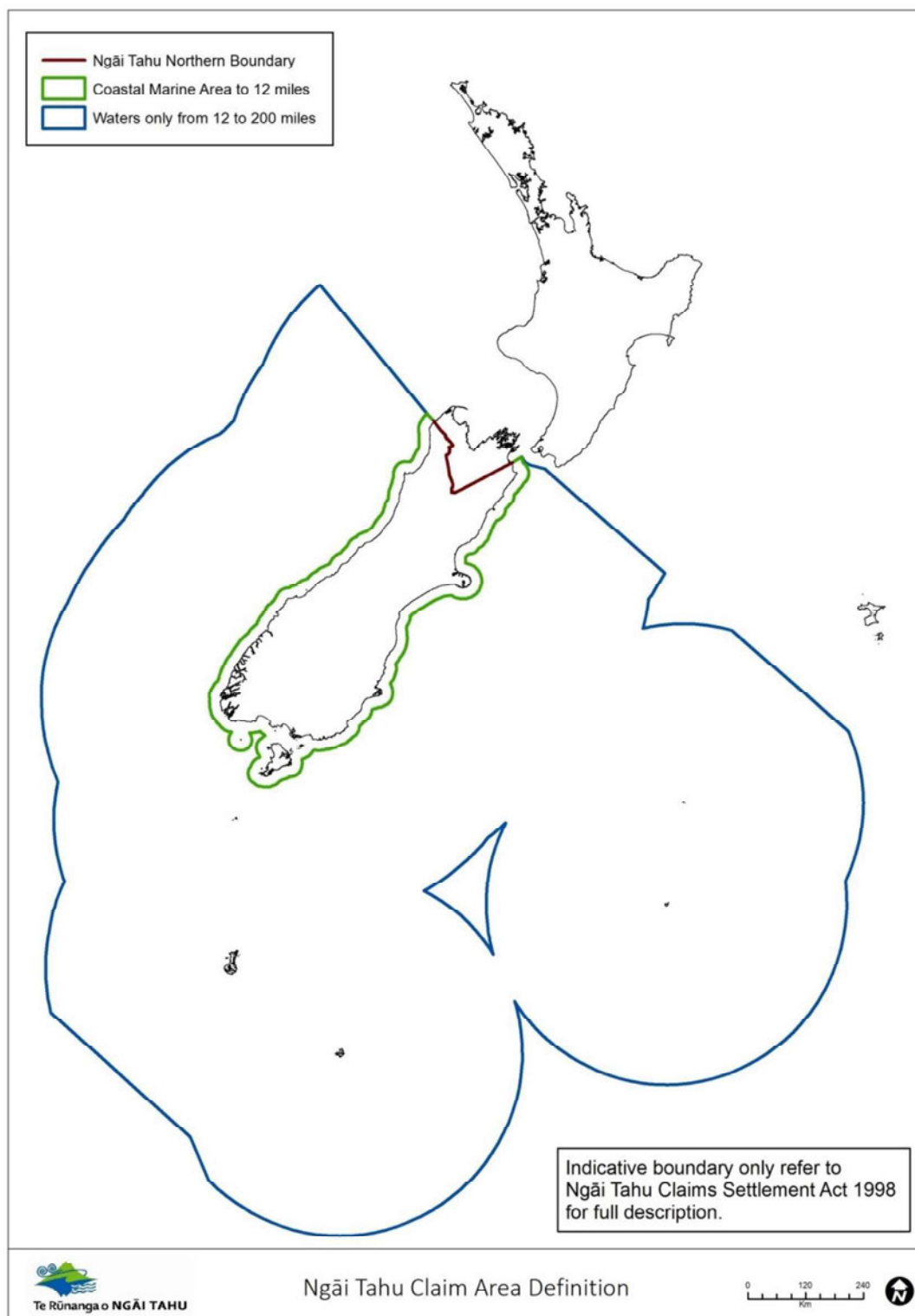
Attachments

Appendix One - Ngāi Tahu claim area

Appendix Two – Te Rūnanga o Ngāi Tahu settlement provisions considered under the Fast Track Act

² *Tau & Ors v Attorney-General*, HC Christchurch CIV 2020-409-534.

APPENDIX ONE: Ngāi Tahu Claim area



APPENDIX TWO: Te Rūnanga o Ngāi Tahu settlement provisions considered under the Fast Track Act

The contemporary relationship between the Crown and Ngāi Tahu is defined by three core documents; Te Tiriti o Waitangi (**the Treaty**), the Ngāi Tahu Deed of Settlement 1997 (**Deed of Settlement**) and the Ngāi Tahu Claims Settlement Act 1998 (**NTCSA**). These documents form an important legal relationship between Ngāi Tahu and the Crown.

Of significance, the Deed of Settlement and NTCSA confirmed the rangatiratanga of Ngāi Tahu and its relationship with the natural environment and whenua within the takiwā. In particular applicants are advised that the following provisions inform principles that are to be embedded into the engagement and assessments provided for Fast Track applications. The extent and form of how those principles are embedded can only be undertaken with guidance and advice from the relevant Ngai Tahu entities for this takiwā: include:

- The Crown's apology
- Rangatiratanga
- Taonga Species - Schedule 97 and Schedule 98
- Mahinga Kai

In addition to the settlement provisions, the application must also identify the parcels of Māori land, marae, and identified wāhi tapu within the project area. It is recommended that the applicant engage with Papatipu Runanga to identify the appropriate way to meet this obligation of the Fast Track Act and review the following Iwi Management Plans:

- [Mahaanui Iwi Management Plan 2013](#)
- [Te Rūnanga o Ngāi Tahu Freshwater Policy](#)

Candys Road/Sabys Road Fast Track Referral Application

From Kerstin Ghisel s 9(2)(a)
Date Wed 2026-02-25 2:01 PM
To ttw@ngaitahu.iwi.nz s 9(2)(a)

📎 1 attachment (402 KB)

20445 FRANCO FTA CONCEPT LAYOUT R1 - Option 1.pdf;

Kia ora,

Our client, Sabys 101 Limited, is looking to develop land at Candys Road/Sabys Road Halswell, for residential purposes. The land is currently zoned rural under the Christchurch District Plan and Partially Operative Selwyn District Plan and the applicant is looking at a fast-track consent to facilitate development of the site.

We are in the early stages of preparing background reports and seeking supporting information from various specialists. A working version of the draft scheme plan is attached and we are happy to share further information with you as the project progresses.

We would value any feedback on the proposal that you may wish to share. We are also happy to meet with you to discuss the proposal in more detail.

It would be appreciated if any feedback you wish to share could be provided by 27 March 2026 (20 working days).

If you have any questions please do not hesitate to contact me.

Ngā mihi,
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate
s 9(2)(a)

PO Box 1749,
Christchurch 8140
Level 3, 61 Cambridge
Terrace,
Christchurch Central
City, Christchurch
8013

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Heritage New Zealand

B&A

Urban & Environmental

101 Sabys Road and John Paterson Drive

From Fast Track <fasttrack@heritage.org.nz>

Date Wed 2026-05-13 4:16 PM

To Kerstin Ghisel s 9(2)(a)

 1 attachment (5 MB)

Draft conditions MR042026.docx;

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Kia ora Kerstin

Thank you for the notification in relation to the above Fast track projects.

We note the following:

101 Sabys Road

- Based on a desktop review of the location, there appears to have been human activity prior to 1900
- We recommend consulting a suitably qualified archaeologist to confirm this and the potential for archaeological material to be present
- If the works may modify or destroy an archaeological site, then an authority will be required prior to any works beginning
- An authority can be applied for under the Heritage New Zealand Pouhere Taonga Act 2014, or as a part of a fast-track application

John Paterson Drive

- We understand you will be applying for an archaeological authority as a part of this fast-track application
- Based on a desktop review there appear to be swampy areas and a creek bordering the southeast of the site
- Archsite does show a midden site (M36/37) recorded along the swampy margins of a connected creek approx. 900m northeast. This site was recorded during the construction of the ChCh Southern Motorway.
- The regional archaeologist advised there may be potential for Māori archaeological sites, especially along the creek.
- The project will need to be assessed by a suitably qualified archaeologist in order to assess effects on any potential subsurface archaeological sites.

We recommend any application includes an archaeological management plan, which must be approved by Heritage New Zealand prior to exercising the authority. We can either approve the management plan during the fast-track process or include a condition setting out what information needs to be included in the management plan.

Any authority that is granted will be subject to conditions. To assist with your understanding of appropriate conditions, attached are commonly used conditions that we adapt to each authority.

In our experience it is good to discuss conditions early with the aim of presenting an agreed set of conditions to the Expert Panel.

Mihi ana

Fast-track Team | Heritage New Zealand Pouhere Taonga

Tairangahia a tua whakarere; Tatakihia nga reanga o amuri ake nei - Honouring the past; Inspiring the future

<https://www.heritage.org.nz/>

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ARCHAEOLOGICAL AUTHORITY

AUTHORITY DETAILS

Authority Number:

Determination Date:

Expiry Date:

Authority Holder:

Postal Address:

Archaeological Sites: List recorded sites and potential subsurface archaeological sites

Location: Legal Description of all parcels

Section 45 Approved Person:

Landowner Consent: To be provided/ Landowner consent has been provided to Heritage New Zealand Pouhere Taonga to satisfy clause 6(1) of Schedule 8 Fast-track Approvals Act 2024.

DETERMINATION

The FTAA Expert Consenting Panel grants/declines an archaeological authority pursuant to section 81 of the Fast Track Approvals Act 2024 and section 48 of the Heritage New Zealand Pouhere Taonga Act 2014 in respect of the archaeological sites described above, within the areas specified in the location above, to [authority holder] for [description of proposal/works] (archaeological works), subject to the following conditions:

CONDITIONS OF AUTHORITY

No.	Condition
Before Works	
1	Start Work Notification The Authority Holder must advise Heritage New Zealand Pouhere Taonga (HNZPT) and [tangata whenua] of the date when archaeological works will begin at least two working days before archaeological works start.
2	Archaeological Management Plan The authority must be exercised in accordance with the Archaeological Management Plan (AMP). The purpose of the AMP is to outline procedures for day-to-day activities that may affect archaeological sites, including provisions for:

- a) Methods to protect **sites** from damage;
- b) procedures for any archaeological investigation or recording of archaeological information;
- c) the role, responsibility and level of authority of the s45 approved person and any other person appointed to undertake archaeological work on their behalf. Names and contact details of all other persons whom the s45 approved person appoints must be stated in the management plan;
- d) timeframes for archaeological work;
- e) protocols for the unexpected discovery of archaeological material;
- f) on-site briefing by the s45 approved person (who may appoint a person to carry out the briefing on their behalf) for contractors about the archaeological work required and how to identify archaeological sites during works. The management plan must state who will be carrying out the briefings;
- g) the responsibilities of contractors with regard to notification of archaeological sites;
- h) requirements for stand down periods to enable archaeological work;
- i) mechanisms for dispute resolution;
- j) emergency contact details for the s45 approved person, Heritage New Zealand Pouhere Taonga, and Iwi.

The AMP must be submitted to HNZPT for approval prior to the commencement of any earthworks. No earthworks shall commence until HNZPT has given its written approval of the AMP.

The Authority Holder may update the AMP by submitting the amended AMP in writing to HNZPT for its written approval.

OR if AMP is approved prior to grant

All works must be undertaken in accordance with the Archaeological Management Plan prepared by [name] titled "**Title**" dated [date prepared] (AMP).

The Authority Holder may update the AMP by submitting the amended AMP in writing to HNZPT for its written approval.

Archaeological Research and Mitigation Strategy

The Authority Holder shall prepare an Archaeological Research and Mitigation Strategy (Strategy).

The Strategy shall include:

- (i) the research objectives that archaeological investigations should address and the methodologies to be followed to achieve those objectives. The research objectives shall be informed by regional and national research themes.
 - (ii) Provision for review and feedback by [tangata whenua] prior to submission to HNZPT, including for any potential amendments after approval
-

	At least 20 Working Days before starting Project Works, the Strategy shall be submitted to HNZPT for written approval. The approved Strategy shall be implemented and complied with for the duration of the Authority. The Authority Holder may update the Strategy by submitting the amended Strategy in writing to HNZPT for written approval. OR if Strategy is approved prior to grant All works must be undertaken in accordance with the Archaeological Research and Mitigation Strategy prepared by [name] titled “Title” dated [date prepared] (Strategy). The Authority Holder may update the Strategy by submitting the amended Strategy in writing to HNZPT for its written approval.
4	Landowner Consent The Authority Holder must provide HNZPT with the written consent of all landowners of the land subject to this Authority prior to any archaeological works commencing.
5	Site Briefing The Authority Holder must ensure that all contractors working on the project are briefed on site by the section 45 approved person (who may appoint a person to carry out the briefing on their behalf) prior to any archaeological works commencing. The briefing must include the possibility of encountering archaeological evidence, how to identify possible archaeological sites, the archaeological work required by the conditions of this authority, and contractors’ responsibilities with regard to discovering archaeological evidence.
During Works	
6	Tikanga Archaeological work must be undertaken in conformity with any tikanga Māori protocols agreed between the Authority Holder and [tangata whenua]
7	Kōiwi Discovery If any kōiwi (human remains) are encountered, all works must cease within 20 metres of the discovery. HNZPT, New Zealand Police, and [tangata whenua] must be advised immediately. Any steps following must be undertaken in accordance with Guidelines for Kōiwi Tangata/Human Remains (AGS8 2014) and no further work in the area may take place until future actions have been agreed by all parties.
8	Monitoring

	Any earthworks that may affect an archaeological site must be monitored by the section 45 approved person, who may appoint a person to carry out the monitoring on their behalf in accordance with accepted archaeological practice, the AMP, and the Strategy.
9	Investigation Any archaeological evidence encountered during the exercise of this Authority must be investigated, recorded and analysed in accordance with accepted archaeological practice. An archaeological investigation must be carried out in accordance with the Strategy prior to earthworks commencing. The aims of the investigation shall be to investigate, research and analyse archaeological evidence in accordance with accepted archaeological practice to gather information about the historical and cultural heritage of New Zealand. Prior to any earthworks, an archaeological investigation must be undertaken, in accordance with section 52(2) of the Act, based on the Strategy. The aims of the investigation shall be to investigate, research and analyse archaeological stratigraphy, features and remains in accordance with accepted archaeological practice to gather information about the historical and cultural heritage of New Zealand. The building must be investigated, recorded and analysed prior to demolition to document and recover information about construction, alteration and use through time. This is to be undertaken to a minimum standard of Level I/II/III recording as defined in Guidelines for the Investigation and Recording of Buildings and Standing Structures (AGS1 2018).
10	Protection of Sites The authority holder shall take the following measures to ensure that sites are protected: a) Sites shall be clearly marked by the s45 approved person who may appoint a person to carry out this activity on their behalf prior to works commencing; b) No vehicles or machinery shall traverse or be parked on sites. c) Sites shall be covered with clean fill to a minimum depth of X and not disturbed during works; d) No excavations shall take place within Y meters of [specify sites /areas].
11	Annual Reporting – if authority duration is longer than 5 years Annually from the date of issue of this authority, the Authority Holder must submit to Heritage New Zealand Pouhere Taonga a written report containing a summary of the progress of the activity and any archaeological findings.
After Works	
12	Work Completion Notification The Authority Holder shall advise HNZPT and [tangata whenua] of the completion of archaeological works within five working days of completion.

13	Completion of Archaeological Siteworks Within 20 working days of the completion of on-site archaeological work associated with this authority, the Authority Holder shall ensure that: (a) An interim report, to the satisfaction of HNZPT, following the Archaeological Report Guideline (AGS12 2023) is submitted to HNZPT for inclusion in the HNZPT Archaeological Reports Digital Library. (b) Site records are updated or submitted to the NZAA Site Recording Scheme.
14	Archaeological Records Within 12 months of the completion of the on-site archaeological work, the Authority Holder shall ensure that a final report, completed following the Archaeological Report Guideline (AGS12 2023), is emailed to HNZPT for inclusion in HNZPT's Archaeological Reports Digital Library, and to [tangata whenua]. A copy must also be provided to the NZAA Central Filekeeper.

101 Sabys Road and John Paterson Drive

From Fast Track <fasttrack@heritage.org.nz>

Date Wed 2026-05-13 4:16 PM

To Kerstin Ghisel s 9(2)(a)

 1 attachment (5 MB)

Draft conditions MR042026.docx;

You don't often get email from fasttrack@heritage.org.nz. [Learn why this is important](#)

Kia ora Kerstin

Thank you for the notification in relation to the above Fast track projects.

We note the following:

101 Sabys Road

- Based on a desktop review of the location, there appears to have been human activity prior to 1900
- We recommend consulting a suitably qualified archaeologist to confirm this and the potential for archaeological material to be present
- If the works may modify or destroy an archaeological site, then an authority will be required prior to any works beginning
- An authority can be applied for under the Heritage New Zealand Pouhere Taonga Act 2014, or as a part of a fast-track application

John Paterson Drive

- We understand you will be applying for an archaeological authority as a part of this fast-track application
- Based on a desktop review there appear to be swampy areas and a creek bordering the southeast of the site
- Archsite does show a midden site (M36/37) recorded along the swampy margins of a connected creek approx. 900m northeast. This site was recorded during the construction of the ChCh Southern Motorway.
- The regional archaeologist advised there may be potential for Māori archaeological sites, especially along the creek.
- The project will need to be assessed by a suitably qualified archaeologist in order to assess effects on any potential subsurface archaeological sites.

We recommend any application includes an archaeological management plan, which must be approved by Heritage New Zealand prior to exercising the authority. We can either approve the management plan during the fast-track process or include a condition setting out what information needs to be included in the management plan.

Any authority that is granted will be subject to conditions. To assist with your understanding of appropriate conditions, attached are commonly used conditions that we adapt to each authority.

In our experience it is good to discuss conditions early with the aim of presenting an agreed set of conditions to the Expert Panel.

Mihi ana

Fast-track Team | Heritage New Zealand Pouhere Taonga

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<https://www.heritage.org.nz/>

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ARCHAEOLOGICAL AUTHORITY

AUTHORITY DETAILS

Authority Number:

Determination Date:

Expiry Date:

Authority Holder:

Postal Address:

Archaeological Sites: List recorded sites and potential subsurface archaeological sites

Location: Legal Description of all parcels

Section 45 Approved Person:

Landowner Consent: To be provided/ Landowner consent has been provided to Heritage New Zealand Pouhere Taonga to satisfy clause 6(1) of Schedule 8 Fast-track Approvals Act 2024.

DETERMINATION

The FTAA Expert Consenting Panel grants/declines an archaeological authority pursuant to section 81 of the Fast Track Approvals Act 2024 and section 48 of the Heritage New Zealand Pouhere Taonga Act 2014 in respect of the archaeological sites described above, within the areas specified in the location above, to [authority holder] for [description of proposal/works] (archaeological works), subject to the following conditions:

CONDITIONS OF AUTHORITY

No.	Condition
Before Works	
1	Start Work Notification The Authority Holder must advise Heritage New Zealand Pouhere Taonga (HNZPT) and [tangata whenua] of the date when archaeological works will begin at least two working days before archaeological works start.
2	Archaeological Management Plan The authority must be exercised in accordance with the Archaeological Management Plan (AMP). The purpose of the AMP is to outline procedures for day-to-day activities that may affect archaeological sites, including provisions for:

- a) Methods to protect **sites** from damage;
- b) procedures for any archaeological investigation or recording of archaeological information;
- c) the role, responsibility and level of authority of the s45 approved person and any other person appointed to undertake archaeological work on their behalf. Names and contact details of all other persons whom the s45 approved person appoints must be stated in the management plan;
- d) timeframes for archaeological work;
- e) protocols for the unexpected discovery of archaeological material;
- f) on-site briefing by the s45 approved person (who may appoint a person to carry out the briefing on their behalf) for contractors about the archaeological work required and how to identify archaeological sites during works. The management plan must state who will be carrying out the briefings;
- g) the responsibilities of contractors with regard to notification of archaeological sites;
- h) requirements for stand down periods to enable archaeological work;
- i) mechanisms for dispute resolution;
- j) emergency contact details for the s45 approved person, Heritage New Zealand Pouhere Taonga, and Iwi.

The AMP must be submitted to HNZPT for approval prior to the commencement of any earthworks. No earthworks shall commence until HNZPT has given its written approval of the AMP.

The Authority Holder may update the AMP by submitting the amended AMP in writing to HNZPT for its written approval.

OR if AMP is approved prior to grant

All works must be undertaken in accordance with the Archaeological Management Plan prepared by [name] titled "**Title**" dated [date prepared] (AMP).

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The Authority Holder shall prepare an Archaeological Research and Mitigation Strategy (Strategy).

The Strategy shall include:

- (i) the research objectives that archaeological investigations should address and the methodologies to be followed to achieve those objectives. The research objectives shall be informed by regional and national research themes.
 - (ii) Provision for review and feedback by [tangata whenua] prior to submission to HNZPT, including for any potential amendments after approval
-

	At least 20 Working Days before starting Project Works, the Strategy shall be submitted to HNZPT for written approval. The approved Strategy shall be implemented and complied with for the duration of the Authority. The Authority Holder may update the Strategy by submitting the amended Strategy in writing to HNZPT for written approval. OR if Strategy is approved prior to grant All works must be undertaken in accordance with the Archaeological Research and Mitigation Strategy prepared by [name] titled “Title” dated [date prepared] (Strategy). The Authority Holder may update the Strategy by submitting the amended Strategy in writing to HNZPT for its written approval.
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14	Archaeological Records Within 12 months of the completion of the on-site archaeological work, the Authority Holder shall ensure that a final report, completed following the Archaeological Report Guideline (AGS12 2023), is emailed to HNZPT for inclusion in HNZPT's Archaeological Reports Digital Library, and to [tangata whenua]. A copy must also be provided to the NZAA Central Filekeeper.

RE: Potential fast track referral

From Nigel Bruer s 9(2)(a)
Date Mon 2026-03-02 1:34 PM
To Kerstin Ghisel s 9(2)(a)
Cc Leah Harding s 9(2)(a) Ruth Evans s 9(2)(a)

Kia ora Kerstin,

It was good to talk to you just now. As discussed, a baseline screening arrangement with a consultant archaeologist may be helpful for this and future projects to determine the likelihood that an authority would be required.

A list of consultant archaeologists can be found at the following link: <https://nzarchaeology.org/membership/consultant-directory>. For legal reasons I cannot recommend anyone in particular. As with any professional service Heritage New Zealand recommends obtaining multiple quotes before engaging someone to undertake any archaeological work.

There are no costs for making an application or obtaining an archaeological authority. Any archaeological work required of the consultant, including initial site assessment and as a result of any authority conditions, will incur costs and needs to be planned for within the project.

Please feel free to get in touch if you have any questions.

Ngā mihi,

Nigel Bruer (he/him) | Archaeologist - Poutairangahia, Canterbury/West Coast | Heritage New Zealand
Pouhere Taonga | PO Box 4403, Christchurch 8140, New Zealand | Ph: +64 (03) 363 1893 | Mobile: s 9(2)(a)
s 9(2)(a) Visit www.heritage.org.nz and learn more about New Zealand's heritage places.

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From: Kerstin Ghisel s 9(2)(a)
Sent: Wednesday, 25 February 2026 2:14 pm
To: Nigel Bruer s 9(2)(a)
Cc: Leah Harding s 9(2)(a) Ruth Evans s 9(2)(a)
Subject: Re: Potential fast track referral

Hello Nigel

I will email through a meeting request for Monday.

I also have another fast track which I would be keen to also discuss at our catch up. Its located at John Paterson Drive, Halswell.

I have attached draft scheme plans for both these fast track proposals.

Thanks
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL

Senior Associate

s 9(2)(a)

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From: Nigel Bruer s 9(2)(a)
Sent: 25 February 2026 12:19 PM
To: Kerstin Ghisel s 9(2)(a)
Cc: Leah Harding s 9(2)(a); Ruth Evans s 9(2)(a)
Subject: RE: Potential fast track referral

You don't often get email from s 9(2)(a) [Learn why this is important](#)

Kia ora Kerstin,

That would be great. I am here the rest of this week but will be out of the office most of next week (Tuesday-Friday). If you could send through a few times that work for you, then we can lock something in.

Ngā mihi nui,

Nigel Bruer (he/him) | Archaeologist - Poutairangahia, Canterbury/West Coast | Heritage New Zealand Pouhere Taonga | PO Box 4403, Christchurch 8140, New Zealand | Ph: +64 (03) 363 1893 | Mobile: s 9(2)(a)
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From: Kerstin Ghisel s 9(2)(a)
Sent: Wednesday, 25 February 2026 11:59 am
To: Nigel Bruer s 9(2)(a)
Cc: Leah Harding s 9(2)(a); Ruth Evans s 9(2)(a)
Subject: Re: Potential fast track referral

Hello Nigel

That would be great. Do you want me to set up a Teams meeting to discuss the archaeological sites further?

Thanks
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate

s 9(2)(a)

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From: Nigel Bruer s 9(2)(a)
Sent: 25 February 2026 11:15 AM
To: Kerstin Ghisel s 9(2)(a)
Cc: Leah Harding s 9(2)(a); Ruth Evans s 9(2)(a)
Subject: RE: Potential fast track referral

Some people who received this message don't often get email from s 9(2)(a)

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Kia ora Kerstin,

Thanks for your email regarding your intended referral for the residential development at 101 Sabys Road (Lot 2-3 Deposited Plan 68573) and 6 Wroots Road under the FTAA.

Heritage New Zealand Pouhere Taonga commend your intent to engage with us regarding the requirement for an archaeological authority. I've quickly looked at some of the historical information available for the project area, which suggests that there is some potential for archaeological sites to be present. We would be happy to discuss this further and provide advice around the requirements under Schedule 8 of the FTAA 2024.

Ngā mihi nui,

Nigel Bruer (he/him) | Archaeologist - Poutairangahia, Canterbury/West Coast | Heritage New Zealand Pouhere Taonga | PO Box 4403, Christchurch 8140, New Zealand | Ph: +64 (03) 363 1893 | Mobile: s 9(2)(a)
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From: Info Southern <ISouthern@heritage.org.nz>
Sent: Wednesday, 25 February 2026 8:15 am

To: Astrid Raats s 9(2)(a)
Subject: Fw: Potential fast track referral

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From: Kerstin Ghisel s 9(2)(a)
Sent: Wednesday, February 18, 2026 1:55:18 PM
To: Info Southern <Southern@heritage.org.nz>
Cc: Ruth Evans s 9(2)(a)
Subject: Potential fast track referral

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Good afternoon,

We are preparing a fast-track referral application for residential development of the land shown below – 101 Sabys Road (Lot 2-3 Deposited Plan 68573) and 6 Wroots Road. 6 Wroots Road is within the Selwyn District and the other properties are Christchurch City.



Figure 1: The subject site outlined in white, parcel boundaries in black and the CCC/SDC boundary in yellow dash.

We would welcome the opportunity to discuss the project with Heritage New Zealand Pouhere Taonga at an early stage to confirm whether an Archaeological Authority is likely to be required under the Heritage New Zealand Pouhere Taonga Act 2014.

A draft scheme plan is currently being prepared and we will provide this to you as soon as it is available to assist with your preliminary review.

Please let me know if you require any further information at this stage.

Thanks,

Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL

Senior Associate

s 9(2)(a)

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Christchurch Central
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Sabys 101 Limited and lodgement of a Referral Application

From Kerstin Ghisel s 9(2)(a)
Date Wed 2026-04-15 4:23 PM
To s 9(2)(a)

 1 attachment (3 MB)

SabysCandyBlock_Lot_Plans_24.03.2026.pdf;

Hello Nigel

Sabys 101 Limited wishes to formally notify Heritage New Zealand that Sabys 101 Limited will be lodging a referral application under the Fast-track Approvals Act 2024 ("FTAA") for the Franco Farms development ("the Project"). The Project will establish:

- Approximately 348 residential lots and associated residential units.
- A neighbourhood centre (approximately 2,115m²) to provide for the future resident's day to day needs located adjacent to Sabys Road.
- A new reserve and enhanced riparian margin adjacent to Knights Stream, the Halswell River and the Creamery Drain.
- The proposal incorporates an integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve (approximately 2,236m²) and stormwater basins with associated wetland areas (approximately 5.6ha) to the south of the application site.
- Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure.

Sabys 101 considers that the Project is a development project that would have significant regional benefits, and that referring the project into the FTAA regime will facilitate the project and is unlikely to materially affect the efficient operation of the approvals process, and is clearly aligned with section 22(1) of the FTAA.

As you are aware, Sabys 101 Limited has already commenced consultation with Heritage New Zealand for this Project, including attending a meeting held recently on 2 March to discuss the proposal, along with various email correspondence. We thank you for your time in participating in these sessions and for the feedback. Since this meeting the applicant has engaged an archaeologist and we will be in touch once we have received their report.

Approvals

A referral application must specify all the approvals that are proposed to be applied for under the fast-track approvals process under the FTAA. The following approvals will be required:

- Schedule 5 approvals relating to the Resource Management Act 1991 ("the RMA"); and
- Schedule 7 approvals relating to the Wildlife Act 1953 ("Wildlife Act")
- Schedule 8 approvals relating to Heritage New Zealand Pouhere Taonga Act 2014 ("HNZ Act")

The FTAA as amended on 31 March 2026 requires the following prior to lodging a referral application with the EPA:

- Consultation requirements in section 11(1)(a), which are not relevant to the Project; and

- Written notification to (relevantly) the relevant local authorities, any relevant iwi authorities, hapū, and Treaty settlement entities, and the relevant administering agencies.

In accordance with section 11 of the FTAA, Sabys 101 Limited gives notice that it intends to lodge a referral application for the Project. It will not file its referral application for 20 working days following the date of this email in order to provide Heritage New Zealand the opportunity to respond to this notice.

Project description

The Project is located at Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573) and 6 Wroots Road. I **attach** a current (draft and tentative) scheme plan in order to give you a better understanding of the Project details.

If you have any questions, please get in touch, and I look forward to hearing from you in respect of this notice.
Thanks,
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate
s 9(2)(a)

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PO Box 1749,
Christchurch 8140
Level 3, 61 Cambridge
Terrace,
Christchurch Central
City, Christchurch
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Ministry for the Environment

B&A

Urban & Environmental

Proposed Fast Track Referral - Candys Rd/Sabys Rd

From Kerstin Ghisel s 9(2)(a)
Date Wed 2026-03-11 2:13 PM
To AdminAgencyFTAA@mfe.govt.nz <AdminAgencyFTAA@mfe.govt.nz>

 1 attachment (1 MB)
Candys Sabys_Block Roothing Plan_11032026.pdf;

Good afternoon,

This email is to request consultation with the Ministry for the Environment in relation to a proposed fast-track referral application.

The referral is for a residential development on rural land at Halswell. Part of the site is within the Christchurch City boundary and the balance is in Selwyn District. A draft scheme plan for the site attached. The proposal includes:

- Approximately 295 residential lots designed to meet demand in this area for standalone residential housing;
- A comprehensive infrastructure strategy that demonstrates how the sites can be serviced via a mix of onsite and reticulated systems;
- Stormwater / flood management;
- Ecological enhancements of waterways that traverse the site;
- Active transport connections to surrounding networks; and
- Strong connection to residential zoned land to the north. The landowner / applicant has recently consented a residential subdivision to the land immediately north of the site at 101 Sabys Road and this proposal has been designed to integrate with that subdivision as to create one cohesive development.

We are aiming to lodge the referral application in April and would welcome any feedback from the Ministry ahead of finalising the application documents.

Please advise next steps for consultation with the Ministry for the Environment, or if you have any questions in relation to the above.

Thanks
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate
s 9(2)(a)

PO Box 1749,
Christchurch 8140
Level 3, 61 Cambridge
Terrace,
Christchurch Central

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Sabys 101 Limited and lodgement of a Referral Application

From Kerstin Ghisel s 9(2)(a)
Date Wed 2026-04-15 4:28 PM
To Admin Agency FTAA <adminagencyftaa@mfe.govt.nz>

 1 attachment (3 MB)

SabysCandyBlock_Lot_Plans_24.03.2026.pdf;

Hello,

Sabys 101 Limited wishes to formally notify the Ministry for the Environment that Sabys 101 Limited will be lodging a referral application under the Fast-track Approvals Act 2024 ("FTAA") for the Franco Farms development ("the Project"). The Project will establish:

- Approximately 348 residential lots and associated residential units.
- A neighbourhood centre (approximately 2,115m²) to provide for the future resident's day to day needs located adjacent to Sabys Road.
- A new reserve and enhanced riparian margin adjacent to Knights Stream, the Halswell River and the Creamery Drain.
- The proposal incorporates an integrated street and reserve network, along with stormwater management areas, to create a well-connected and cohesive neighbourhood.
- Open spaces will be integrated throughout the development proposal, including a central neighbourhood reserve (approximately 2,236m²) and stormwater basins with associated wetland areas (approximately 5.6ha) to the south of the application site.
- Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure.

Sabys 101 considers that the Project is a development project that would have significant regional benefits, and that referring the project into the FTAA regime will facilitate the project and is unlikely to materially affect the efficient operation of the approvals process, and is clearly aligned with section 22(1) of the FTAA.

As you are aware, Sabys 101 Limited has previously emailed the Ministry for the Environment for this Project on 11 March provide details of the proposal along with a draft scheme plan.

Approvals

A referral application must specify all the approvals that are proposed to be applied for under the fast-track approvals process under the FTAA. The following approvals will be required:

- Schedule 5 approvals relating to the Resource Management Act 1991 ("the RMA"); and
- Schedule 7 approvals relating to the Wildlife Act 1953 ("Wildlife Act")
- Schedule 8 approvals relating to Heritage New Zealand Pouhere Taonga Act 2014 ("HNZ Act")

The FTAA as amended on 31 March 2026 requires the following prior to lodging a referral application with the EPA:

- Consultation requirements in section 11(1)(a), which are not relevant to the Project; and
- Written notification to (relevantly) the relevant local authorities, any relevant iwi authorities, hapū, and Treaty settlement entities, and the relevant administering agencies.

In accordance with section 11 of the FTAA, Sabys 101 Limited gives notice that it intends to lodge a referral application for the Project. It will not file its referral application for 20 working days following the date of this email in order to provide the Ministry for the Environment the opportunity to respond to this notice.

Project description

The Project is located at Lot 2-3 Deposited Plan 58573 and Lot 2-3 Deposited Plan 68573) and 6 Wroots Road. I **attach** a current (draft and tentative) scheme plan in order to give you a better understanding of the Project details.

If you have any questions, please get in touch, and I look forward to hearing from you in respect of this notice.
Thanks,
Kerstin

Ngā mihi | Kind regards,

KERSTIN GHISEL
Senior Associate

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