

Response ID ANON-URZ4-5FRR-M

Submitted to Fast-track approval applications  
Submitted on 2024-05-02 15:37:01

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:  
Suburban Estates Limited (Suburban Estates) on behalf of Anne Lois Stokes and Brian James Stokes (the Stokes)

2 Contact person

Contact person name:  
Rachel Murdoch

3 What is your job title

Job title:  
Principal, Greenwood Roche

4 What is your contact email address?

Email:  
s 9(2)(a)

5 What is your phone number?

Phone number:  
s 9(2)(a)

6 What is your postal address?

Postal address:  
  
PO Box 139, Christchurch 8140

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

The subject site is located at 81 Gressons and 1375 Main North Road, Waikuku, Canterbury (the Site), shown on the maps attached at Appendix A.

The Site is approximately 25 minutes’ drive north from central Ōtāutahi/Christchurch, and is situated between Waikuku township to the north, Ravenswood to the south, and Pegasus to the east. The Site comprises approximately 144ha of land over eleven separate parcels, described below.

The Site is currently owned by the Stokes family, who have been operating the land as a dairy farm since 1943. It is currently zoned Rural under the

Operative Waimakariri District Plan (Operative Plan), and a combination of Rural Lifestyle and Large Lot Residential under the notified proposed Waimakariri District Plan (WPDP). The Stokes have lodged submissions on the WPDP and Variation 1 to the WPDP (being an intensification planning instrument), seeking to rezone the Site to General Residential/Medium Density Residential zone.

File upload:

Appendix A - Site Map.pdf was uploaded

Upload file here:

Appendix C - Outline Development Plan.pdf was uploaded

Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

Appendix B - Records of Title.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

The registered legal land owners of all titles within the Site except CB406/181 are Brian James Stokes and Anne Lois Stokes. CB406/181 is owned by Brian Stokes and Anne Hughes, Brian's sister.

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

The Stokes and Suburban Estates are partnering to plan and deliver the project. That partnership is subject to a formal agreement.

As the registered legal owners of the Site, the Stokes have full control over (including legal access to) the Site. This will enable them, in conjunction with Suburban Estates, to quickly and efficiently action any works required for the project.

For its part, Suburban Estates has been developing land for housing across New Zealand for more 73 years. In that time, it has delivered over 10,000 sections across more than 200 subdivisions. It has a strong, well-established reputation for delivering high quality, vibrant residential neighbourhoods where families, businesses, and nature thrive, and the evolving needs of communities are met.

There are various legal interests registered against the above titles. These are described in Appendix B to this document. In summary, none of these interests will impede development of the Site as envisioned by the project.

Suburban Estates has permission on behalf of the Stokes to submit this application and to be the registered applicant with respect to all necessary consents and permits.

## Section 2: Project details

What is the project name?

Please write your answer here:

Gressons Road Development

What is the project summary?

Please write your answer here:

The project will enable the subdivision and development of approximately 1,500 homes and supporting community features including public and active transport connections, green spaces and infrastructure on a site adjoining existing residential and commercial development in the Waimakariri District. The project will provide much needed housing capacity for that part of the district, in a location that is well-connected to existing major transport links. It is also located immediately adjacent to the third largest commercial centre in the district and as such will both support the ongoing development and vitality of the Ravenswood commercial centre and enable future residents to be able to live in close proximity to various employment opportunities and services. Key features of the project are the numerous initiatives to enhance the landscape and ecological values of the Site. These include extensive riparian planting, landscaping, the creation of an ecological restoration area and new wetlands, resulting in green spaces which extend over 35ha of the Site.

What are the project details?

Please write your answer here:

The purpose of the project is to contribute an additional 1,500 high quality homes with supporting infrastructure to the existing supply of housing in an area which is currently facing high demand and a shortfall in available land capacity over the next 10 years.

Greater Christchurch as a whole (including the urban areas of the Waimakariri District) has experienced unprecedented demand for residential land since

2020. In the face of that, the constrained land supply particularly in the urban areas of Selwyn and Waimakariri has, in conjunction with low interest rates, triggered severe price escalation. In the part of the Waimakariri District where the Site is located, the average section sale price increased by 82.9% from 2020 to 2022. While the level of escalation has tapered in recent months, strong demand remains such that, according to recent economic analysis commissioned by the applicant, available land supply will be exhausted in the next seven years.

It is within that context that the project seeks to increase housing supply by providing an additional 1,500 homes in a strategically positioned location, adjoining an existing commercial hub and major existing transport connections through to urban centres including Christchurch and Rangiora. The Site's suitability to accommodate residential growth in the future has been recognised through its identification for that purpose in Waimakariri District Council's (WDC) District Development Strategy (District Development Strategy).

As discussed further below, in line with the District Development Strategy and in accordance with the directions of the National Policy Statement on Urban Development 2020 (NPS-UD), the Stokes (with support from the applicant) are currently seeking to rezone the Site for residential purposes through the WPDP. Confirmation of this project within Schedule 2A of the Bill would accelerate the delivery of that housing and its supporting infrastructure, enabling a more rapid response to the current shortfall.

There are a number of features within the Site which have shaped the objectives of this project:

- The Site's hydrological and geographical settings combined with its interface with State Highway 1 have provided the opportunity for an extensive green space along its eastern frontage. That green space will include landscaping, dedicated new wetland areas, an ecological restoration area, and comprehensive, hydraulically separated treatment facilities for stormwater.
- Working closely with its ecologists, landscape and urban design experts and its stormwater engineer, the applicant is proposing to retain and enhance two dedicated natural, spring-fed waterways as key parts of the project. Those waterways will be improved with indigenous landscape planting along their margins, which will contribute to their ecological and amenity value. The project will also include walkways and cycle paths adjoining those waterways. In addition, two areas of dedicated open space for the community will be provided.
- A range of housing typologies and densities will be provided throughout the Site and positioned to respond to the character of the surrounding land uses (higher density closer to the commercial hub with lower density to the west and north of the Site where adjoining land uses have a more rural characteristic).
- External and internal connections within the Site have been purposefully designed to enhance accessibility between residents and community facilities, including the adjoining Ravenswood Key Activity Centre commercial hub. The Site is also well-connected to major transport routes through to Christchurch and Rangiora, which are serviced by public transport.
- The Site's strategic location means that, subject to the completion of planned capacity upgrades and the provision of local connections by the applicant, wastewater and potentially water supply for the project can be connected to and adequately serviced by WDC's existing reticulated systems. If water supply cannot be provided through the existing systems, on-site supply will be provided via a drilled bore and accompanying treatment and connection infrastructure. The suitability of these options for servicing the project has been agreed with WDC in principle.
- The Site is located within a wider area that has particular significance to Te Rūnanga o Ngāi Tahu and Te Ngāi Tūāhuriri Rūnanga who hold mana whenua over that area. There is also a known, specific wāhi tapu area on the eastern edge of the Site, opposite the Preece Road intersection, which will be protected as part of the project. The applicant is committed to engaging and working with the Rūnanga in relation to the project and the ways in which it could protect and enhance values of particular importance to the Rūnanga.

These features of the project all reinforce the aim of delivering a quality urban environment within the Site that integrates with, and contributes positively to the functioning of, the wider urban environment (including Ravenswood to the south). Through its various ecological initiatives, the applicant's ecologists also consider that the project could achieve a biodiversity net gain.

Delivery of these features as part of the project will be secured by way of an Outline Development Plan (ODP) and supporting provisions, which is consistent with the approach taken for all new greenfield developments in Canterbury. That ODP, included as Appendix C, has been developed and refined in response to substantial technical assessments commissioned by the applicant which address the environmental and geotechnical conditions of the Site and its surrounds as well as the landscape and urban design opportunities within the Site and its broader context. Some of these features will also be subject to regional consenting processes, but have been designed and positioned within the Site to achieve the outcomes within the relevant national and regional planning documents regarding water quality and natural hazard management.

In terms of the project's specific activities, these comprise:

- subdivision of the Site;
- waterways;
- enhancing the health and ecological value of natural spring-fed waterways on the Site, including through extensive landscape planting;
- establishing a dedicated overland flood path;
- discharging stormwater, and taking and/or diverting groundwater;
- constructing residential units, and a small retail/community hub;
- preserving and, where appropriate, enhancing (in conjunction with mana whenua) an existing wāhi tapu area on the Site;
- developing open space (including open space with a dedicated stormwater or flood management function) and public reserves; and
- constructing or installing infrastructure or structures associated with the subdivision and development referred to above, including roading, pedestrian and cycleways, private accessways, driveways and parking areas, and three waters infrastructure
- earthworks (including earthworks that disturb potentially contaminated soils and earthworks within 10 metres of a natural wetland);
- vegetation removal, and landscaping and planting throughout the Site;

- establishing new wetlands and an ecological restoration area; and
- redirecting existing springs into, and widening, natural spring-fed waterways.

As discussed further below, drawing on other technical analysis, the applicant's planner has carefully assessed the project and has concluded that enabling the delivery of housing as proposed through the ODP aligns with the relevant directions in the Resource Management Act's (RMA) national and regional planning documents, and overall will achieve the purpose of the RMA. In addition to the significant additional housing capacity it will provide and the opportunity for a biodiversity net gain, high level estimates indicate that over the total life of the project, the project will contribute:

- \$931 million in value added to the Canterbury economy (operating surplus, wages and salaries paid to staff and working proprietors, depreciation, taxes and subsidies);
- \$437 million dollars in gross household income (wages and salaries) for Canterbury households;
- Approximately 7,030 full-time equivalent workers (FTEs) over the life of the project.

Those economic and social benefits are considered to have regional and national significance.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

Delivery of the project will be grouped into four initial stages. The first stage, scheduled for 2024 – 2025 will involve completing the rezoning of the Site through the WPDP process and obtaining all necessary approvals for the project, preferably through the Fast-track Approvals Bill once enacted. During that first stage, a detailed masterplan based on the ODP will be progressed which will guide the layout of the subdivision, including infrastructure and supporting amenities. Matters requiring approval from WDC, including infrastructure design, will also be completed and lodged with WDC.

The next two stages, occurring over late 2025 – 2027, will involve the construction and release of 200+ lots supported by transport and waters infrastructure, and the commencement of the green space planting works along the eastern boundary of the Site and riparian planting along the waterways.

The third stage will comprise multiple phases in which additional lots are released along with the commensurate expansion of the infrastructure and landscaping. The applicant has both the experience and the financial backing to increase the number of lots delivered annually, and this will be monitored closely in planning for each phase.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource consents under the RMA, including land use and subdivision consents and a suite of construction and operational phase regional consents concerning the taking, use, and discharge of water.

Approvals may also be required under the Wildlife Act 1953 and the Heritage New Zealand Pouhere Taonga Act 2014.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Waimakariri District Council  
Canterbury Regional Council (Environment Canterbury)

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

No resource consent applications or notices of requirement have previously been lodged for this project.

As noted above, the Stokes have however made multiple submissions on the WPDP requesting that the Site is rezoned for residential purposes (noting it is currently subject to a Rural Lifestyle and Large Lot Residential zoning under the notified WPDP). Detailed evidence in support of those submissions has been lodged on behalf of the Stokes, and a hearing in respect of those submissions is scheduled for the end of July 2024.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

N/A

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

As indicated above, construction of the first 100 lots and supporting infrastructure and amenities will promptly begin upon securing the required resource consents and all other necessary approvals (2025, if progressed under the Fast-track Approvals Bill). Detailed design tasks requiring WDC approval will be advanced alongside the preparation of consent applications. Through rezoning submissions and collaboration with expert consultants, key design challenges such as stormwater management, wastewater disposal, potable water supply, and ecological preservation have already been identified, and feasible engineering solutions have largely been determined.

The project will be a collaborative effort between the Stokes and Suburban Estates. The Stokes, who own the Site, will provide their land for the Project, eliminating the need for land procurement. Suburban Estates will cover all expenses for the development aspects of the project, including consultants, construction and council fees, among others, through private funding without any reliance on borrowing or finance.

Completion of the project (including delivery of all lots, supporting infrastructure and amenities) will occur in stages, as discussed above. At this stage, the applicant is estimating a total project timeline (from commencement of the project to completion) of over 10 years.

### Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

The following persons are considered likely to be affected by the project:

- WDC (the relevant local authority).
- Environment Canterbury (the relevant local authority).
- Te Rūnanga o Ngāi Tahu (the relevant iwi authority) and Te Ngāi Tūāhuriri Rūnanga (one of the Papatipu Rūnanga of Ngāi Tahu, in whose takiwa the Site is located).
- Waka Kotahi/New Zealand Transport Agency.
- The landowners and occupiers of the properties adjacent to the Site (identified in Appendix D).
- Department of Conservation.
- Heritage New Zealand Pouhere Taonga.
- Ministry of Education.

A summary of the consultation undertaken with these parties is attached as Appendix E to this document.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Appendices D & E - Attached

Upload file here:

Appendix D and E - Adjacent Properties and Consultation Undertaken.pdf was uploaded

Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

The project has not consisted of any processes under the Public Works Act 1981 in relation to the land.

### Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The project is located within Te Waipounamu as covered by the Deed of Settlement between the Crown and Te Rūnanga o Ngāi Tahu. The settlement dated 21 November 1997 records the matters required to give effect to the settlement of all of Ngāi Tahu's historical claims. The settlement is implemented in a legislative sense through the Ngāi Tahu Claims Settlement Act 1998.

There are no specific principles and provisions in the settlement, including statutory acknowledgements, that specifically apply to the geographical location of the project.

None of the land on which the project activities will occur is land that has been or is required to be returned under the Ngāi Tahu Claims Settlement Act 1998.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

N/A

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

N/A

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

N/A

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

N/A

Upload your assessment if necessary:

No file uploaded

## Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

A detailed summary of the potential effects of the project on the environment is set out below, and is based on a series of technical assessments undertaken by experts appointed on behalf of the applicant. Those assessments are available on request, and address the following potential effects of the project:

- Landscape and visual amenity.
- Urban form, functionality, density and character, and effects on rural character.
- Cultural values.
- Ecological values.
- Transport matters.
- Infrastructure and servicing matters.
- Geotechnical conditions.
- Contamination.
- Productive soils.

In addition to these assessments, the applicant has also obtained an assessment of the impact of the project on the supply of housing within the district and Greater Christchurch and the other economic costs and benefits associated with the project. The findings of that assessment are addressed in section 7.

In summary, the ODP, including the various features which will guide development of the Site, has been designed to ensure that there are no significant anticipated or known adverse effects of the project on the environment, and that all other adverse effects can be appropriately managed.

Landscape and visual amenity, and urban form, functionality, density and character. The landscape and visual amenity effects of the project, and the extent to which it operates internally as, and contributes externally to, a well-functioning urban environment, have been considered and addressed in detail by the applicant's landscape and visual amenity and urban design experts.

In short, those experts agree that, as illustrated by the figure in Appendix F, the project forms a logical urban extension to the Ravenswood Key Activity Centre, completing an outstanding “notch” in the centric form of the wider urban environment which encompasses Ravenswood and Woodend to the south, Pegasus to the east, and Waikuku to the north. That in turn supports more integrated, balanced urban form, focussing growth around existing and new residential areas and ensuring that those areas (as enabled by the proposal) are accessible to community and commercial services and open space. That accessibility along with the proposed infrastructure also supports walking and cycling over vehicular movement, which is a key aspect of the proposal.

While establishment of housing on the Site will result in a change to its existing character, which is rural in nature, that change has been anticipated in the District Development Strategy and consistent with the directions of the NPS-UD, is not, of itself, considered to be an adverse effect.

The project has also included a number of key initiatives in the ODP which are designed to “soften” the transition in character and land use, particularly at the interfaces between the Site and its rural or rural residential neighbours to the west and north. Those initiatives include specific boundary treatments (setback, fencing and planting) and the provision of lower density lots to contribute to a greater sense of openness along these boundaries.

Within the Site, the proposed layout of the project seeks to locate higher density areas of housing in appropriate locations, including adjacent to open/communal spaces and toward the southern boundary with the Ravenswood Key Activity Centre. The key roading and active connections networks have been carefully located to provide safe, logical accessibility between residential areas and open/communal spaces within the Site and commercial areas adjoining the Site. Alongside the movement networks, an extensive “green network” is intended to organise and provide shape to the built form within the project. That “green network” comprises existing landscape features which will be protected and enhanced, and new features, including an extensive green space along the eastern side of the Site which, in addition to providing a significant landscape buffer between housing and the State Highway, will play a vital role in attenuating and treating stormwater and contributing to the landscape and ecological amenity of the Site.

These initiatives, along with the relevant rules, standards and supporting directions within the WPDP, will ensure that any adverse urban, landscape and/or visual amenity effects of the project will be appropriately addressed. They also ensure that the project reflects best-practice urban design, and achieves the relevant criteria for new growth areas established by the relevant planning documents. In that regard the project is considered to have a number of positive effects on the form, functionality and character of the wider urban environment.

#### Cultural

As noted above, the applicant recognizes that the Site forms part of a wider receiving environment that is understood to hold significant importance for Te Ngai Tūāhuriri Rūnanga and Te Rūnanga o Ngāi Tahu. That is evidenced by a “silent file” notation which extends across the majority of the Site under the relevant district plans. It is also a function of the Site’s close proximity to Kaiapoi Pā and the significance that the Kaiapoi Pā and the surrounding area has to mana whenua. The Stokes have a long personal history of interaction with local mana whenua, particularly regarding the ongoing management of a known wāhi tapu site on the eastern edge of the Site.

In that context (and as noted above), the applicant’s expert team has taken careful account of those known features and the iwi management plan in informing their analysis and their recommendations for development of the ODP. The ODP has likewise been developed with reference to the policy outcomes contained in the WPDP relating to sites and areas of significance to Māori. As a result, the ODP contains a number of initiatives intended to respond to those directions and outcomes regarding the cultural wellbeing of mana whenua. Those are outlined above, and include protection of the wahi tapu site, enhancement of existing waterways and provision for a new, enhanced waterway, separation of untreated stormwater from spring-fed waterways, and other ecological enhancements.

Accounting for those initiatives, it is therefore considered that the project will ensure that any adverse effects on known features of significance to mana whenua generally will be adequately avoided, remedied or mitigated. The applicant is however committed to working alongside mana whenua to understand any other matters of significance, and to identify how those matters – and the cultural wellbeing of mana whenua more generally – might be appropriately protected or otherwise addressed through the project.

#### Ecology

The ecological values of the Site have been assessed by Wildlands on behalf of the applicant. In short, Stokes Drain (which is a spring-fed waterway) and two of its tributaries on the Site are considered to have moderate ecological value, providing habitat to tuna/eels and inanga. Areas within the Site were also identified as providing potential habitats for lizards and other threatened bird species. Two wetlands areas identified on the Site were considered to have low ecological value, and are not recommended for retention by Wildlands. In that context, Wildlands considers that, with the following initiatives proposed as part of the project, the project could result in a net biodiversity gain:

- Retaining, naturalising and enhancing Stokes Drain (a spring-fed waterway), including with indigenous planting.
- Retaining existing springs and redirecting them into new, enhanced waterways which increase river extent and quality.
- Providing for new wetlands as part of the extensive stormwater management/green space area along the eastern side of the Site.
- Providing a new ecological restoration area within that green space area.
- Providing a new waterway along the southern boundary of the Site.

#### Transport

The effects of the project on the transport network have been assessed by Stantec on behalf of the applicant. Stantec has also considered the relative accessibility of the Site to community services and activities (including employment and education hubs) and its ability to accommodate public and active transport. Stantec has concluded that the project will not result in any significant adverse transport effects.

In summary, the Site is located in close proximity to major transport routes through to Christchurch and Rangiora which currently support regular public transport connections. Internally, the proposed roading layout has been designed to avoid direct connection to the State Highway, and to maximise connectivity between residential areas on the Site and community facilities within and adjacent to the Site, including the Ravenswood Key Activity Centre to the south. It has also been designed to provide good active transport options throughout the Site, connecting to external linkages particularly toward Rangiora. In these respects, the project will contribute to a reduction in transport-related greenhouse gas emissions.

In that context, it is not considered that the project will result in any significant adverse transport effects.

#### Natural hazards

Like much of the Waimakariri District that falls within Greater Christchurch, the Site is currently susceptible to flood hazards in high volume events, with detailed flood modelling undertaken in conjunction with WDC showing a reasonably extensive overland flow path through the centre of the Site in a 1:200 year event.

In that context, the applicant has worked closely with its engineering team at Davie Lovell Smith to identify a number of initiatives to address flood hazards, including provision of a significant Central Flood Bypass Channel and use of areas within the eastern green space to attenuate flood waters in high-volume events. Flows moving from the west will be funneled into the Central Channel through a green space interception channel along the western boundary of the Site. Flood events between the 1:50 and 1:200-year will also be managed through standard overland flow measures, including roads, channels and other public spaces. In addition to these on-site measures, all finished floor levels for dwellings will be elevated to WDC standards above the 1:200-year event plus a WDC approved freeboard.

These measures will be subject to further refinement during the detailed design phase, and will be subject to regional consenting requirements which will ensure that any adverse effects resulting from flooding hazards are appropriately addressed.

The Site is located some 3km inland from the coast and therefore is not susceptible to coastal inundation, even under climate change induced sea level rise.

Like much of Greater Christchurch, parts of the Site are susceptible to liquefaction in a seismic event. The mitigation of liquefaction risk is a matter that has been the subject of extensive study following the Canterbury Earthquake Sequence. There are well-established solutions for managing this risk, through both bulk earthworks at time of subdivision and through foundation design under the Building Code.

The Site is not otherwise subject to elevated risk from any other natural hazard.

#### Servicing

The applicant's engineering team has been liaising closely with WDC infrastructure staff on options for ensuring that the wastewater and water supply demands associated with the project can be appropriately accommodated within the WDC-owned networks. Those options have been agreed in principle as being acceptable, with WDC agreeing that planned upgrades can be accelerated to meet the demand associated with the project if required.

As noted above, stormwater management has had a significant influence on the design and layout of the project. A series of pipes and secondary flow paths through the Site will funnel stormwater into a dedicated treatment and storage facility within a wider green space area at the eastern end of the Site. That facility will comprise three separate systems which are hydraulically isolated by Stokes Drain, the Central Flood Bypass Channel and a new waterway along the southern boundary of the Site. The stormwater facility (including these three systems) will be designed to achieve stormwater neutrality for up to a 1:50 year event, and would be discharged via an existing culvert under State Highway 1.

These aspects of the project will be subject to standard regional consenting requirements, and will be designed to ensure that there are no significant adverse effects on the environment, including the function of the existing networks.

#### Contamination and geotechnical conditions

ENGEO was commissioned by the applicant to identify potential existing contamination on the Site, and the implications of any contamination for residential development, including risk to human health. ENGEO was also commissioned to assess the geotechnical conditions on Site, and its relative suitability for residential development. In regard to contamination, ENGEO confirmed that:

- It is highly unlikely that the majority of the Site has been used for an activity included in the Hazardous Activities and Industries List.
- There are however a number of localised areas where contamination may have occurred due to the presence of burn pads, disused on-site wells, storage of agrichemicals, fuel storage, outdoor storage of treated wood, use of potential asbestos containing materials in farm buildings, and use of an area as a transport depot.
- These activities are common with rural land use and not geographically extensive. Remediation of those areas in accordance with a contamination management plan to be developed during the consenting phases will ensure that any adverse effects (including risks to human health) could be adequately managed.

In regard to the geotechnical conditions of the Site, ENGEO confirmed that:

- There are no conditions which would preclude residential development on the Site.
- A comprehensive design solution will be required for the project that responds to the variability in soil material and high groundwater, and that reduces the potential risk of land settlement following urbanization. Development of that design solution will require further investigation into specific areas of the Site, which can be readily achieved prior to seeking necessary consents.
- In general however, these risks are well-understood particularly in the Canterbury context.
- There are no other known potential natural hazards that could affect the project area. In particular the area is not likely to be subject to material damage from erosion, falling debris, subsidence or slippage of inundation from any source.

#### Productive soils

The Site is excluded from the transitional definition of "highly productive land" under the National Policy Statement on Highly Productive Land 2022 (NPS-HPL), as it is subject to a WDC-initiated plan change (being the WPDP review) to rezone the Site from Rural to the Rural Lifestyle zone. That has been agreed with WDC. Nevertheless, the applicant has commissioned an assessment of the Site's productive capacity, which has identified a number of significant practical constraints on its ongoing use for primary production.



## Greenhouse gas emissions

The applicant has received a detailed technical assessment of the extent to which the project would contribute to a reduction in greenhouse gas emissions compared to its current use as a dairy farm and/or provision of that housing in other areas of the district. That assessment confirms that relative to other locations in the district, the Site is well located for encouraging the reduction in emissions due to its proximity to Woodend and Rangiora, its existing public transport services that can be expanded to meet increased customer growth, and the ability to establish a significant increase in carbon sequestering tree cover through the large open space areas and street tree and riparian plantings. It also confirms that the removal of dairy cows from the Site to accommodate the project will directly support a reduction in greenhouse gas emissions.

Upload file:

Appendix F - Urban Context.pdf was uploaded

## Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

The following national policy statements are relevant to, and have directly informed the design of, the project:

- NPS-UD.
- National Policy statement for Freshwater Management 2020 (NPS-FM) and National Environmental Standards for Freshwater (NES-F).
- National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB).

As noted above, the NPS-HPL does not apply to the Site as the Site is excluded from the transitional definition of “highly productive land”.

A general assessment of the project in relation to the above national policy statements is set out below. In summary, subject to detailed design and consenting through the subdivision process, the project will enable a form of development that gives effect to all relevant national policy statements.

### National Policy Statement on Urban Development 2020

The NPS-UD sets the national direction for how, when, and to what end urban development is to take place in New Zealand. To that end, it sets objectives regarding, inter alia:

- realising well-functioning urban environments that enable all people and communities to provide for their wellbeing, and for their health and safety, now and into the future (objective 1);
- planning decisions that improve housing affordability by supporting competitive housing and development markets (objective 2), and are integrated with planning and funding decisions, strategic over the medium and long term, and are responsive, particularly in relation to proposals that supply significant development capacity (objective 6);
- planning documents enabling more people to live in areas which are well connected to employment opportunities and public transport, and have high demand for housing (objective 3); and
- the role of New Zealand's urban environments in supporting reductions in greenhouse gas emissions, and improving resilience to climate change (objective 8).

As part of implementing these objectives, the NPS-UD requires local authorities to have sufficient zoned and infrastructure enabled land (including a 20% capacity buffer) to meet short – medium term demand.

The project meets all of these objectives, and critically, will address the current shortfall in housing capacity within the Waimakariri District so as to ensure that WDC as a tier 1 authority meets its obligations to provide at least sufficient development capacity over the short, medium and long-term. Economic analysis commissioned by the applicant has identified that within the Woodend/Pegasus area of the Waimakariri District, there is currently a shortfall of housing capacity of over 1,000 dwellings in the short to medium term. Based on projected demand, all available land which is enabled for housing will be exhausted within the next 7 years if further opportunity for residential development is not provided. A failure to address that shortfall with some urgency could have profound impacts for housing affordability within the district.

In that context, the provision of an additional 1,500 homes through the project is significant. That significance, however, is elevated in light of the findings of the applicant's experts that the project will contribute to a well-functioning urban environment that enables all people and communities to provide for their wellbeing now and in the future. That outcome is a product of the Site's location near to other urban areas and the adjoining Key Activity Area as well as significant transport corridors, including public and active transport linkages. It is also a product of the project's careful design, including its proposed variety of housing typologies, the accessibility it provides to community facilities, the way in which it will support a reduction in greenhouse gas emissions, and the way in which it proposes to enhance existing ecological values around the Site.

Put simply, the project meets all the criteria established by the NPS-UD for the kind of urban development that should, in accordance with the NPS-UD, warrant a strongly positive response, particularly in light of the current projected shortfall in housing in the Waimakariri District.

### National Policy Statement for Freshwater Management 2020, National Environmental Standards for Freshwater and the National Policy Statement on Indigenous Biodiversity 2023

As noted above, existing watercourses and remnant wetland areas have been identified on the Site, and therefore the NPS-FM, the NES-F and the NPS-IB are relevant to the project.

Central to the NPS-FM's approach to the management of freshwater is the concept of Te Mana o te Wai, which refers to the fundamental importance of water and requires the management of resources in a way which prioritises:

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

Key policies that are of particular relevance to the project include:

Policy 6: There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.

Policy 9: The habitats of indigenous freshwater species are protected.

Policy 15: Communities are enabled to provide for their social, economic, and cultural well-being in a way that is consistent with this National Policy Statement.

The single objective of the NPS-IB is to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity. This outcome includes protecting and restoring indigenous biodiversity while providing for the social, economic, and cultural wellbeing of people and community now and in the future.

Of particular relevance to the project, Policy 13 seeks that the restoration of indigenous biodiversity is promoted and provided for; and Policy 14 seeks that an increase indigenous vegetation cover in both urban and non-urban environments is promoted.

As noted above, the applicant has commissioned Wildlands' to undertake ecological assessment of the Site's values and the potential impact of the project on those values. That assessment identifies that the primary features of ecological value on the Site are Stokes Drain and its tributaries and feeder springs, and the freshwater habitats that they support. It does not consider that the remnant wetland areas have values which are worth retaining, and considers that those areas should instead be replaced (as proposed) with new wetland areas on the Site.

The other ways in which those findings have been addressed through the project is set out in section 5 above. Those initiatives are identified in, and secured through, the ODP, and will be subject to consenting requirements in the relevant regional plan and the NES-F.

It is recognised that the design and consenting of these initiatives, including the rationalisation and naturalization of waterways, landscaping and the establishment of the ecological restoration area, will be a considerable cost to the project. However, those initiatives provide a significant opportunity to deliver high value ecological and amenity outcomes for the Site and the wider environment in a manner which is consistent with the directions of the NPS-FM, the NES-F and the NPS-IB.

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## Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

As noted above, the Site is currently zoned Rural under the Operative Plan. Under the WPDP, the Site is predominantly zoned Rural Lifestyle, with an area of Large Lot Residential along its northern boundary.

As noted above, the Stokes whānau have lodged a submission on the WPDP seeking to rezone the Site for residential purposes. Decisions on that submission are expected in the first half of 2025. If that submission is accepted and not subject to appeal, then, under the standard RMA process, the applicant would need to seek resource consent for the project. Although the zoning framework which would apply to the Site would be considerably more favourable than its current zoning, it is still possible that that application would be notified. If the application went to a contested hearing, then it could be between 12 – 18 months from lodgment before a decision on the project was issued. That decision would be subject to normal appeal rights to the Environment Court which could add a further 12 – 24 months.

By comparison, if the project was included as a Schedule 2A project under the Bill, the applicant could immediately apply to the expert consenting panel for resource consent for the project. Based on existing timeframes within the Bill, recommendations from the panel in respect of that resource consent could be issued within six months of lodgment. A decision from the Ministers in respect of those recommendations would then follow, and would not be subject to the same risk of appeal. The fast-track process is therefore significantly faster, more cost-efficient, and provides more certainty than the standard RMA process. Those advantages are particularly beneficial in light of the current shortfall in available housing capacity in the Waimakariri District, which warrants an urgent response.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

Referral of this project will require the dedication of some resource within the EPA to manage the approvals process as well as the appointment of an expert consenting panel to consider and make recommendations on any application. However, the applicant is confident that referral of the project will not adversely impact the efficient operation of the fast-track process for the following reasons:

- The applicant is an experienced, established, well-funded development company based in Canterbury/Waitaha. Working in partnership with the Stokes whānau and its expert team, the applicant has spent considerable time and money investigating the opportunities for, and constraints on, developing the Site for housing in a manner that supports communities and their wellbeing while also looking after the natural environment. As a result, it has a significant body of evidence prepared on its behalf regarding the Site, which has also informed the careful design of the project outlined in the ODP. It can therefore be expected that any application for resource consent would be comprehensive, well-considered and supported by robust technical evidence, thereby reducing the likely need for numerous requests for further information which negatively impact the efficient operation of the fast-track process.
- The prospect of utilising the Site for residential housing was raised through the Stokes' submission on the WPDP, and received only two further submissions – neither of which opposed that proposal. One was a further submission in support of the rezoning while the other (from Waka Kotahi) sought a further increase in building height limits within the Site. That absence of opposition indicates that use of the Site for housing is unlikely to generate significant controversy, particularly as it has already been identified in the District Development Strategy as appropriate for accommodating future residential growth.
- The applicant has engaged an expert team who have previous experience in utilising and navigating fast-track processes. For example, the applicant's legal counsel engaged for the project have led nine resource consent applications or notices of requirement processed under the COVID-19 Recovery (Fast-track Consenting) Act 2020, and have had direct involvement (including as a panel member) in several others.

In short, this project is well-advanced and is supported by a comprehensive understanding of the Site and its surrounds. It is being led by an experienced land development company which is supported by an expert team that has particular experience with fast-track consenting processes. It is therefore considered that referral of the project will contribute to, rather than compromise, the efficient operation of the fast-track process.

Has the project been identified as a priority project in a:

Local government plan or strategy

Please explain your answer here:

The project specifically has not been identified in any local government plan or strategy as a priority project. However, as identified above, the District Development Strategy (prepared and adopted by WDC) has identified the Site as an appropriate location to accommodate future residential growth. The District Development Strategy is a 30-year guide to how the district's townships will expand and change in order to accommodate the anticipated growth in both housing and employment. The District Development Strategy identified that the new growth directions "take into account the areas of unacceptable natural hazard risk and areas of significant environmental and cultural values". In addition, the northern third of the Site is zoned Large Lot Residential in the notified WPDP, while the balance of it is zoned Rural Lifestyle. While it is the position of the applicant's experts that a General Residential/Medium Density Residential zoning across the whole Site is the more appropriate outcome, that notified zoning indicates a shift away from a Rural use to accommodating a greater level of residential development.

Will the project deliver regionally or nationally significant infrastructure?

Not Answered

Please explain your answer here:

N/A

Will the project:

increase the supply of housing, address housing needs, contribute to a well-functioning urban environment

Please explain your answer here:

As discussed in section 6 above, the proposal will add significantly to development capacity in the Waimakariri District, contributing 1,500 additional homes. It will address housing needs by providing a variety of housing typologies, and will improve housing affordability by supporting competitive land markets. Through the ODP, the project will deliver a range of housing typologies (at a mixture of densities) with the goal of achieving a minimum density of at least 12 households per hectare. Through its design and location, the project will contribute to a well-functioning urban environment while also enhancing key features of the natural environment within the Site.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

A high-level assessment of the project's economic impact has been undertaken using multiplier analysis, with economic impacts expressed in 2020 dollar and employment terms. That assessment estimates that over its lifetime, the project could:

- contribute \$931 million in value added to the Canterbury economy;
- generate wages/salaries for Canterbury households to the value of \$437 million;

• sustain employment for around 7,030 FTE years across a broad range of sectors in Canterbury (equating to approximately 350 full-time workers for each year of the project's lifetime).

In addition to these direct benefits, the assessment also estimates that the project will help improve housing affordability within the Waimakariri through increasing supply, and will contribute to the economic performance of the adjoining Ravenswood Key Activity Centre.

These economic benefits are significant in both a regional and national context. Including the project in Schedule 2A of the Bill will help accelerate the realisation of those benefits, which is particularly significant given the current challenges facing the New Zealand economy.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

Emissions analysis commissioned by the applicant confirms that the project will contribute to a reduction in greenhouse gas emissions.

Current greenhouse gas emissions resulting from the existing dairy farm (including fertiliser application) are projected to be 1,428 tons of carbon dioxide (CO<sub>2</sub>) per annum which is the equivalent to 5.67 million vehicle kilometers travelled in a typical NZ vehicle (using the Ministry for the Environment's default private car emission factor (2022) per km of 0.252) or the average annual electricity usage emissions of approximately 2,265 Canterbury households (per Electricity in New Zealand, 2018, The Electricity Authority). Replacing the farm with housing will terminate these emissions.

In terms of the emissions associated with the project, that assessment identifies a number of beneficial features associated with the Site and the ODP:

- New roading in the ODP has been minimised as much as practicable, and the flat nature of the Site will limit the extent of earthworks required. Both features reduce the potential for greenhouse gas emissions.
- Increased density is also advantageous in terms of reducing emissions relating to provision of infrastructure.
- The Site is located in close proximity to commercial, employment and education areas, and is well serviced in terms of public and active transport connections. That will reduce reliance on private car travel, and reduce the frequency and distance of private car travel compared to sites which are more distant from these facilities.
- Significant areas of green space provided for in the ODP, including wetland areas, will provide some carbon sequestration.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

As set out in section 5 above, ensuring the resilience of the project against the risks of natural hazards (and flooding in particular) has significantly shaped its design and layout. Through specific features incorporated as part of the ODP (discussed above) and through minimum building floor levels, the project will ensure that adverse effects of significant flood events (up to 1:200-year) will be adequately mitigated. Extensive landscape planting, green spaces and dedicated storage areas will also support adaptive management of natural hazards.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

The project will address the following significant environmental issues:

- By providing 1500 homes, the project will meet the current projected shortfall in available housing capacity within the Waimakariri District over the short – medium term, which will improve housing affordability.
- The project will complete an outstanding “gap” within the wider urban environment comprising Pegasus, Waikuku, Woodend and Ravenswood, and will integrate well with those adjoining areas and contribute to positive functioning of that environment as a whole.
- By enhancing existing waterways, increasing the extent of new waterways, providing new wetland areas and a dedicated ecological restoration area, the project will deliver the opportunity for a biodiversity net gain.
- Through provision of an extensive stormwater area on the eastern side of the Site, the project will enhance the way in which natural hazard risks and the flow of stormwater generally is managed on the Site.

• As part of the project, existing contamination on the Site will be remediated, and the replacement of the dairy farm on the Site will terminate existing greenhouse gas emissions.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

The project has been designed to align with the directions of the relevant local and regional planning documents as they relate to, inter alia:

- The way in which new urban development is to be delivered, including through the use of an ODP that meets specific design criteria.
- The servicing of new urban development.
- The protection and enhancement of ecological values.
- The protection and enhancement of values/features of significance for mana whenua.
- The design and location of transport connections, including active transport.
- The management of natural hazard risk.
- The provision of public open space.

As the Site is located outside the boundary of the existing urban limit imposed by the CRPS and is not otherwise identified for development within that document, the project cannot be said to align with the directions of the CRPS as they relate to the anticipated location of urban development within the Canterbury region.

That inconsistency is, in the opinion of the applicant's expert planner, overcome by the urgent need for additional housing within the Waimakariri District and the clear directions of the NPS-UD for local authorities to provide at least sufficient development capacity through to the long term and to be responsive to proposals which will add significantly to development capacity within the district where they contribute to well-functioning urban environments. Put simply, all of those criteria are fulfilled by the project.

Anything else?

Please write your answer here:

The project will deliver 1,500 additional houses in an area which is currently facing a shortfall in supply over the short – medium term. Through the Site's location and by applying best-practice urban design, the project will contribute to a well-functioning urban environment while also enhancing key natural environment features within the Site, creating the opportunity to achieve a net biodiversity gain. Put simply, delivery of the project will have significant benefits for Waimakariri and the wider Canterbury region. Accelerating the realisation of these benefits is not only a positive economic, environmental and social outcome, it is also necessary in order to address the current shortfall in housing capacity in the Waimakariri District.

The project is being led by an experienced land development company in partnership with the current owners who have looked after the land for over 80 years. In short, it is a project which has significant regional benefits and warrants inclusion within Schedule 2A of the Bill.

Does the project include an activity which would make it ineligible?

No

If yes, please explain:

N/A

## Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

Yes

If yes, please explain:

As discussed in section 5, the Site, like much of the Waimakariri District, is susceptible to flooding in significant rainfall events. Through the acceleration of climate change, those rainfall events are projected to increase in severity and regularity. In response, the project has included specific initiatives to ensure that the adverse effects of such events are appropriately managed. Those initiatives are described above in section 5.

## Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

On 23 June 2023, Suburban Estates Limited was issued with an abatement notice and an accompanying fine of \$400.00 in respect of an unlawful discharge of sediment from one of its development sites. That notice required all necessary action to be taken to ensure there was no further unlawful

discharges of sediment laden water and that all future discharges complied with CRC185715.

In response, Suburban Estates immediately paid the fine and engaged directly with the contractor to ensure that all future stormwater discharges would comply with the conditions of CRC185715. No further action has been taken by Environment Canterbury and the matter has now been resolved.

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## Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Rachel Murdoch

Important notes