



Application for a project to be referred to an expert consenting panel

(Pursuant to Section 20 of the COVID-19 Recovery (Fast-track Consenting) Act 2020)

For office use only:

Project name: Faringdon South West and South East
Application number: PJ-0000720
Date received: 27/10/2020

This form must be used by applicants making a request to the responsible Minister(s) for a project to be referred to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

All legislative references relate to the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the Act), unless stated otherwise.

The information requirements for making an application are described in Section 20(3) of the Act. Your application must be made in this approved form and contain all of the required information. If these requirements are not met, the Minister(s) may decline your application due to insufficient information.

Section 20(2)(b) of the Act specifies that the application needs only to provide a general level of detail, sufficient to inform the Minister's decision on the application, as opposed to the level of detail provided to an expert consenting panel deciding applications for resource consents or notices of requirement for designations.

We recommend you discuss your application and the information requirements with the Ministry for the Environment (the Ministry) before the request is lodged. Please contact the Ministry via email: fasttrackconsenting@mfe.govt.nz

The Ministry has also prepared [Fast-track guidance](#) to help applicants prepare applications for projects to be referred.

Part I: Applicant

Applicant details

Person or entity making the request: Hughes Development Limited

Contact person: Jake Hughes

Job title: Director

Phone: s 9(2)(a)

Email: s 9(2)(a)

Postal address:

PO Box 848, Christchurch 8140

Address for service (if different from above)

Organisation: Greenwood Roche

Contact person: Lauren Semple

Job title: Partner

Phone: s 9(2)(a)

Email: s 9(2)(a)

Email address for service:

Postal address:

PO Box 139, Christchurch

Part II: Project location

The application: does not relate to the coastal marine area

If the application relates to the coastal marine area wholly or in part, references to the Minister in this form should be read as the Minister for the Environment and Minister of Conservation.

Site address / location:

A cadastral map and/or aerial imagery to clearly show the project location will help.

The project will locate on two blocks of land on Selwyn Road, south of Rolleston township in the Selwyn District of Canterbury. The blocks are an extension of the existing Faringdon residential development undertaken by HDL under the provisions of the Housing Accords and Special Housing Area Act (HAASHA), and are identified as Faringdon South West and Faringdon South East respectively. Faringdon South West is bounded by Goulds Road, East Maddisons Road, and Selwyn Road, and is shown in Attachment 1. It occupies all the land within that block other than the south west corner, and has a total area of 46.323ha. It is comprised of eight separate parcels of land, the legal descriptions for which are described below. Faringdon South East is also identified Attachment 1. It is a rectangular block of land located on the north east corner of Springston Rolleston Road and Selwyn Road. It is comprised of six separate parcels of land, also described below.

Legal description(s):

A current copy of the relevant Record(s) of Title will help.

Faringdon South West block:

Lot 1 DP 69688; Lot 4 DP 355996; Lot 2 DP 326339; Lot 3 DP 326339; Lot 4 DP 326339; Lot 2 DP 343803; Lot 1 DP 74660; and Lot 1 DP 343803.

Faringdon South East block:

Lot 1 DP 60892; Lot 1 DP 441634 and Lot 1 DP 479375; Lot 2 DP 63632 and Lot 3 DP 441634; Lot 2 DP 479375; Lot 1 DP 341771; and Lot 2 DP 341771.

Copies of these titles are included as **Attachment 2**.

Registered legal land owner(s):

HDL is the registered land owner of all of land in the Faringdon South East block.

HDL is the registered land owner of the majority of the land in the Faringdon South West block. For those properties for which it is not yet the registered owner, it holds unconditional agreements for sale and purchase.

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work that is required for the project:

As either the registered owner or the purchaser under an unconditional agreement for sale and purchase, HDL controls all of the land in both blocks. Full ownership of all land in the blocks will enable the applicant to quickly and efficiently undertake the works required for the project.

Part III: Project details

Description

Project name: Faringdon South West and South East

Project summary:

Please provide a brief summary (no more than 2-3 lines) of the proposed project.

The project will enable the development of up to 930 new homes in Rolleston in the Selwyn district of Canterbury, one of the New Zealand's fastest growing areas with an identified residential capacity constraint. Delivery of these homes will contribute ^{§ 9(2)(b)(ii)} in direct expenditure to the local economy, and support employment for up to 1550 jobs each year for the duration of the development project (2021 - 2028).

Project details:

Please provide details of the proposed project, its purpose, objectives and the activities it involves, noting that Section 20(2)(b) of the Act specifies that the application needs only to provide a general level of detail.

The project will enable the development of up to 930 new homes in Rolleston in the Selwyn district of Canterbury, one of the New Zealand's fastest growing areas with an identified residential capacity constraint.

Of the 930 allotments, 500 will be provided in the FSW block, with 430 in the FSE block. The proposed allotments will comprise a mixture of low and medium density size options, with lower density generally located towards surrounding rural areas, and medium density located more centrally within the blocks. A supporting road network with pedestrian and cycle linkages and a network of local recreation reserves will also be provided in accordance with the Outline Development Plans included as **Attachment 3**. The allotments will be serviced through connections to the Council's reticulated network which, with some minor upgrades, has sufficient capacity to serve this extension.

Analysis undertaken by Market Economics (**Attachment 4**) identifies that over the last two decades, the Selwyn district has expanded from around 28,300 residents in 2001 to 65,600 in 2019. With overall growth during the last two decades sitting at 4.8% per annum, and accelerated population growth following the 2010/2011 Canterbury earthquakes, only the Queenstown Lakes District has expanded at a similar rate.

Complementing strong population increases, the Selwyn district economy has also experienced strong employment growth up from around 12,500 jobs in 2001 to 22,600 in 2019. Employment in the district has increased by 3.3% per

annum, again much faster than almost every other district in New Zealand (only Queenstown Lakes grew faster at 5.5%).

Analysis has, however, also confirmed that there is a shortfall in the supply of land for housing development in the Selwyn district, and particularly near the Rolleston town centre. As part of their obligations under the now-replaced National Policy Statement on Urban Development Capacity 2016, Selwyn District Council (*SDC*) and the Greater Christchurch Partnership (*GCP*) have undertaken capacity modelling showing a shortage of urban land in the Selwyn district occurring in late 2028/2029. More recent work undertaken by Market Economics however suggests that the capacity constraint is likely to occur earlier than originally predicted – in 2026-2028. Similar assessment undertaken by Davie Lovell Smith on behalf of the Applicant indicates that the capacity constraint may hit as early as 2023/2024.

In response to the findings of that capacity assessment, a future development strategy was prepared by the GCP which identifies “future development areas” within greater Christchurch. The project land is located within one of the identified future development areas. In addition to their ability to add significant (but appropriate) development capacity to meet demand, these areas were selected because of their alignment with long term transport and infrastructure planning and investment across greater Christchurch. Key focus areas for this planning include increasing the number of people living in areas that are accessible to a mix of transport modes, and ensuring that future growth can be appropriately serviced.

Prior to the release of the National Policy Statement on Urban Development (*NPS-UD*), it was anticipated that facilitating development of these areas (including the FSW and FSE) would require amendments to the Canterbury Regional Policy Statement 2016 (*CRPS*) and the relevant district plan. To that end, an application for a streamlined planning process was accepted by the Minister for the Environment to amend the CRPS. It is understood that this action is now on hold, on the basis that the future development areas can now be progressed as out of sequence developments in accordance with the NPS-UD. This, of course, still requires a plan change to progress via the standard Resource Management Act Schedule 1 process. With agreement from SDC, HDL had previously lodged a plan change to enable development of the FSW and FSE for housing pending the RPS amendments. That plan change is now progressing under the out of sequence provisions of the NPS-UD.

Whilst the promulgation of the NPS-UD enables the plan change to now proceed, the Schedule 1 process is still expected to take significant time (2 – 4 years). As with the existing Faringdon residential development (consented under the provisions of the HAASHA), non-complying resource consents could be utilised to accelerate the project. This would enable the expedited provision of 930 homes to meet a projected shortfall in capacity while also providing the immediate economic stimulus of the planning and construction phase for industries and communities whose social and economic wellbeing has been impacted by COVID-19. Analysis undertaken by Market Economics suggests the creation of 12,400 job years and \$684m in increased GDP. Alongside achieving these objectives, the project will also promote the sustainable management of natural and physical resources as envisaged by the NPS-UD, the CRPS (as it applies to the form of, and requirements for, housing development), and the Selwyn District Plan.

Where applicable, describe the staging of the project, including the nature and timing of the staging:

As an experienced and well resourced development entity and the legal owner or unconditional purchaser of all land in the project area, HDL has the capability and capacity to immediately commence development in both FSW and FSE. Initial staging suggests that the initial land development can occur in 2021 with the first 100 houses available in 2022 followed by:

- 150 houses in 2023
- 200 houses in 2024
- 200 houses in 2025
- 150 houses in 2026
- 100 houses in 2027
- The final 30 houses in 2028

By way of example, and to provide some confidence as to capability, HDL received approval to proceed with Faringdon South (an extension of the existing Faringdon development) as a Special Housing Area in 2016. Between that time and 2018, 550 lots were developed and sold, in addition to the 1000 lots previously sold as part of the earlier

development. Since 2018, two further Faringdon developments (totalling 246 lots) have been released to market and are also now completely sold.

Consents / approvals required

Relevant local authorities: Selwyn District Council

Resource consent(s) / designation required:

Land-use consent, Subdivision consent, Discharge permit

Relevant zoning, overlays and other features:

Please provide details of the zoning, overlays and other features identified in the relevant plan(s) that relate to the project location.

Legal description(s)	Relevant plan	Zone	Overlays	Other features
Refer Attachment 2	Selwyn District Plan	Rural Inner Plains	N/A	N/A

Rule(s) consent is required under and activity status:

Please provide details of all rules consent is required under. Please note that Section 18(3)(a) of the Act details that the project **must not include** an activity that is described as a prohibited activity in the Resource Management Act 1991, regulations made under that Act (including a national environmental standard), or a plan or proposed plan.

Relevant plan / standard	Relevant rule / regulation	Reason for consent	Activity status	Location of proposed activity
Operative Selwyn District Plan C10 (Rural) Subdivision	10.11.3	Does not meet requirements for subdivision in the zone.	Non-complying	FSE and FSW as previously described
Operative Selwyn District Plan C3 (Rural) Building and Density	3.10.6	Does not meet the requirements for density in the zone	Non-complying	FSE and FSW as previously described
Operative Selwyn District Plan C1 (Rural) Earthworks	1.1	Exceeds maximum earthworks provisions in the zone	Discretionary	FSE and FSW as previously described

Resource consent applications already made, or notices of requirement already lodged, on the same or a similar project:

Please provide details of the applications and notices, and any decisions made on them. Schedule 6 clause 28(3) of the COVID-19 Recovery (Fast-track Consenting) Act 2020 details that a person who has lodged an application for a resource consent or a notice of requirement under the Resource Management Act 1991, in relation to a listed project or a referred project, must withdraw that application or notice of requirement before lodging a consent application or notice of requirement with an expert consenting panel under this Act for the same, or substantially the same, activity.

As noted, a plan change has been prepared and lodged with the Selwyn District Council related to this project. Selwyn District Council has accepted this plan change and it has been notified for public comment. No resource consent applications have been lodged.

Resource consent(s) / Designation required for the project by someone other than the applicant, including details on whether these have been obtained:

There are no resource consents required for the project by any other party.

Other legal authorisations (other than contractual) required to begin the project (eg, authorities under the Heritage New Zealand Pouhere Taonga Act 2014 or concessions under the Conservation Act 1987), including details on whether these have been obtained:

There are no additional legal authorisations required for the project other than the consents set out above.

Construction readiness

If the resource consent(s) are granted, and/or notice of requirement is confirmed, detail when you anticipate construction activities will begin, and be completed:

Please provide a high-level timeline outlining key milestones, e.g. detailed design, procurement, funding, site works commencement and completion.

Upon receipt of consents, development could commence immediately (2021). The requisite funding is, or could be quickly, put in place and procurement is not expected to be protracted given the current environment and the relationships already in place with the applicant as a well resourced and experienced development entity.

Initial staging work suggests that first 100 houses can be available in 2022 followed by:

- 150 houses in 2023
- 200 houses in 2024
- 200 houses in 2025
- 150 houses in 2026
- 100 houses in 2027
- The final 30 houses in 2028

Part IV: Consultation

Government ministries and departments

Detail all consultation undertaken with relevant government ministries and departments:

Over the preceding 12 months, HDL has engaged with the Minister for Housing and Urban Development, and subsequently, the Minister for Housing and Greater Christchurch Regeneration regarding options to address the shortfall in housing capacity in the Selwyn district.

Records of that engagement are available on request.

The key focus of this engagement was on identifying the constraint imposed by the CRPS on development outside of existing urban areas and identified greenfield priority areas, (the rural urban or infrastructure boundary) and the impact that such constraint was having on the availability of land for housing. As described below, that constraint was recognised by the Greater Christchurch Partnership which resulted in the project area (among others) being identified as an appropriate future development area and an application being made (and approved by the Minister for the Environment) for a streamlined planning process to amend the CRPS.

Local authorities

Detail all consultation undertaken with relevant local authorities:

HDL has engaged extensively with SDC on the shortfall in housing capacity in Rolleston generally, and specifically regarding the opportunity presented by the extension to the Faringdon development to address that shortfall. Records of that engagement are available on request.

As noted above, SDC has now accepted a request for a plan change lodged by HDL which would provide for the project within the Operative Selwyn District Plan. As the planning and design for that plan change, and the project specifically, has developed, HDL sought feedback from various Council staff (including members of the policy planning and asset teams). That feedback was generally accepted and has been reflected in the plans for the project.

Other persons/parties

Detail all other persons or parties you consider are likely to be affected by the project:

- JR Scott and MG Stephens, Lot 1 DP 5565; Lot 1 DP 16498.
- JE and RA Harneiss, RS 9201.
- AR and MA Morris, RS 6345.
- DJ Brown, HM Rains and PJ Rains, Lot 3 DP 354252.
- JW and KC Thomas, Lot 2 DP 354252.
- AS Cartwright, Lot 1 DP 82966.
- AJ Cartwright, PA and RA Day, Lot 2 DP 82966.

Detail all consultation undertaken with the above persons or parties:

The applicant has been in regular contact with the owners of Lot 1 and 2 DP 82966.

No other consultation has been undertaken with the above parties.

Part V: Iwi authorities and Treaty settlements

For help with identifying relevant iwi authorities, you may wish to refer to [Te Kāhui Māngai – Directory of Iwi and Māori Organisations](#).

Iwi authorities and Treaty settlement entities

Detail all consultation undertaken with Iwi authorities whose area of interest includes the area in which the project will occur:

Iwi authority	Consultation undertaken
Te R?nanga o Ng?i Tahu	Ng?i Tahu are tangata whenua of the Canterbury region. The contemporary structure of Ng?i Tahu is set down through the Te R?nanga o Ng?i Tahu Act 1996 and, through this structure and this Act, sets the requirements for recognition of tangata whenua in Canterbury. Te Ng?i T??huriri and Te Taumutu R?nanga being one of the 18 papatipu r?nanga of Te R?nanga o Ng?i Tahu hold manawhenua over the project's location, as it is within their takiw?. The natural resources – water; mahinga kai; indigenous flora and fauna; cultural landscapes and land – are taonga to manawhenua and they have concerns for activities which potentially adversely affect these taonga. These taonga are integral to the cultural identity of ng? r?nanga manawhenua and they have a kaitiaki responsibility to protect them. The policies for protect of taonga that are of high cultural significance to ng? r?nanga manawhenua and are articulated in the Mahaanui Iwi Management Plan (MIMP). Mahaanui Kuraataiao Limited is an environmental advisory established by the six local r?nanga of Canterbury to assist and improve the recognition and protection of mana whenua values within their takiw?. It has reviewed the proposed development and has identified key matters within the MIMP which are relevant to the project. The proposed development has also been presented to r?nanga representatives from both Te Ng?i T??huriri and Te Taumutu R?nanga. The representatives do not have any concerns about the proposal as it is an expansion for a proposal that they were not opposed to in the past. They have however requested that the following conditions be imposed: • An accidental Discovery Protocol should be followed for all earthworks which is consistent with Appendix 3 of the MIMP. • The applicant should follow the Ng?i Tahu guidelines on subdivision development when designing the subdivision. Where appropriate, those conditions will be proposed by the applicant as part of the consent applications.

Detail all consultation undertaken with Treaty settlement entities whose area of interest includes the area in which the project will occur:

Treaty settlement entity	Consultation undertaken
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Treaty settlements

Treaty settlements that apply to the geographical location of the project, and a summary of the relevant principles and provisions in those settlements, including any statutory acknowledgement areas:

Section 18(3)(b) of the Act details that the project **must not include** an activity that will occur on land returned under a Treaty settlement where that activity has not been agreed to in writing by the relevant land owner.

The project does not include an activity that will occur on land returned under a Treaty settlement.

Part VI: Marine and Coastal Area (Takutai Moana) Act 2011

Customary marine title areas

Customary marine title areas under the Marine and Coastal Area (Takutai Moana) Act 2011 that apply to the location of the project:

Section 18(3)(c) of the Act details that the project **must not include** an activity that will occur in a customary marine title area where that activity has not been agreed to in writing by the holder of the relevant customary marine title order.

N/A

Protected customary rights areas

Protected customary rights areas under the Marine and Coastal Area (Takutai Moana) Act 2011 that apply to the location of the project:

Section 18(3)(d) of the Act details that the project **must not include** an activity that will occur in a protected customary rights area and have a more than minor adverse effect on the exercise of the protected customary right, where that activity has not been agreed to in writing by the holder of the relevant protected customary rights recognition order.

N/A

Part VII: Adverse effects

Description of the anticipated and known adverse effects of the project on the environment, including greenhouse gas emissions:

In considering whether a project will help to achieve the purpose of the Act, the Minister may have regard to, under Section 19(e) of the Act, whether there is potential for the project to have significant adverse environmental effects. Please provide details on both the nature and scale of the anticipated and known adverse effects, noting that Section 20(2)(b) of the Act specifies that the application need only provide a general level of detail.

Urban/rural interface/reverse sensitivity matters. The project forms an extension to an existing urban environment within a future urban development area. The allotments will comprise a mixture of low and medium density size options, with lower density generally located towards surrounding rural areas, and medium density located more centrally within the blocks. The layout for both blocks responds sensitively to its interfaces with both existing and future adjacent development and its urban/rural setting, and otherwise aligns with the design principles of the Rolleston Structure Plan.

In particular, it is only proposed to upgrade Selwyn Road to urban standards along the frontage of the subject site. The southern side of Selwyn Rd will retain its rural standard. Complimenting this approach, the development sits on the northern side of Selwyn Road thereby ensuring that the southern aspect of future dwellings and vehicle access is obtained from Selwyn Rd. Living areas, windows and outdoor areas will all be designed for north, north-west elevations which are removed from the road. These factors also lead to dwellings being setback from Selwyn Road by

a minimum of 4.5m, which in combination with the legal width of Selwyn Road ensures an appropriate physical separation between dwellings and the rural-zoned land to the south.

With these features in place, it is not considered that the project will generate adverse effects on these matters. It is also noted that the proposed subdivision represents an extension of the already completed Faringdon South Special Housing Area. To date there is no record with the Council nor the developer of any concerns relating to reverse sensitivity or adverse effects on the rural land.

Geotechnical analysis (**Attachment 5**) has confirmed that, owing to the nature of the subsurface materials and depth to groundwater at the site, the potential for adverse effects in the form of damage caused by liquefaction and lateral spreading on the site is very low. There are no other known or anticipated natural hazards which could adversely affect the site or the project.

The proposed approach to servicing the extension will ensure that project will not have any anticipated or known adverse effects on **groundwater**.

Analysis has confirmed the existence of a small area of **highly versatile soils** in FSE. The limited extent of the area would however only provide for a very small horticultural enterprise. As such, while residential development is anticipated to have an adverse effect on those soils, the significance of that adverse effect in terms of the protection of highly versatile soils from inappropriate subdivision, use and development is low.

Traffic analysis by Carriageway Consulting (**Attachment 6**) has confirmed that there are no anticipated or known adverse transport effects arising from the project. Its assessment was undertaken on the basis that the roading environment and frontages adjoining the project area will be upgraded to an urban formation including kerbs and footpaths, and a wider carriageway. There are no identified constraints to these upgrades, which will be completed as part of the project.

Carriageway Consulting also concluded that the project will enable a reduction in the speed limit of the surrounding roads which is expected to further support a safer environment. Overall, the traffic generated by the development of FSW and FSE in accordance with the Outline Development Plans can be accommodated on the adjacent roading network without any capacity or efficiency issues arising, even allowing for development of surrounding residential areas.

An assessment undertaken by Davie Lovell-Smith confirms that the project will support a reduction in **greenhouse gas emissions** by reducing the extent of vehicle travel which would otherwise occur if the demand for housing in the Rolleston area had to be met elsewhere. A 2019 capacity assessment undertaken by Davie Lovell-Smith (**Attachment 7**) illustrates that FSE and FSW is one of the very few areas within the area which can meet the necessary demand for housing. If the project is not realised, that demand will be met by housing developments further afield. By comparison, the use of FSE and FSW for housing development accords with the Rolleston Structure Plan which was prepared to ensure future growth was planned and delivered in an orderly and consolidated manner. Critically:

- It is located in close proximity to key community infrastructure including Foster Park, the Rolleston Aquatic Centre and Lemonwood Grove Primary School. It is also located close to what will be a new primary school within Acland Park, and potentially a new secondary school near the Selwyn Road – Springston Rolleston Road intersection.
- It will include two neighbourhood centres to provide for the convenience needs of local residents.

The proximity of this development to these key community facilities will ensure a reduction in the extent of car travel which would otherwise occur if the demand for housing had to be met by developments located further afield. As vehicles are significant contributors to greenhouse gas emissions, a reduction in distances for day-to-day travel will support a reduction in those emissions and will encourage the use of alternative modes of transport. In that regard, Davie Lovell-Smith notes that an extensive pedestrian and cycle network will be provided as part of the project, and will connect to established networks within Faringdon and along Springston Rolleston Road. The proposed layout is also conducive to supporting future public transport.

In summary, through both its proximity to Rolleston and the provision of infrastructure to encourage low-emissions travel options, the project is considered to support a reduction in greenhouse gas emissions.

Part VIII: National policy statements and national environmental standards

General assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard:

The National Policy Statement on Urban Development 2020 is the only operative national direction which is considered to be directly relevant to the project.

The NPS-UD became operative in August 2020, and is focussed on enabling growth by requiring councils to provide development capacity meet the needs of communities and to encourage well-functioning urban environments. "Well-functioning urban environments", according to the NPS-UD, are environments which, as a minimum:

- have or enable a variety of homes that:
 - meet the needs, in terms of type, price, and location, of different households;
 - enable Māori to express their cultural traditions and norms;
 - have or enable a variety of sites that are suitable for different business sectors in terms of location and site size;
 - have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport;
 - support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets;
 - support reductions in greenhouse gas emissions; and
 - are resilient to the likely current and future effects of climate change.

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

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.

Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of urban environment in which one or more of the following apply:

- - The area is in or is near a centre zone or other area with many employment opportunities.
 - The area is well-served by existing or planned public transport.
 - There is high demand for housing or for business land in the area, relative to other areas within the urban environment.

Objective 6: Local authority decisions on urban development that affect urban environments are:

- - integrated with infrastructure planning and funding decisions; and
 - strategic over the medium and long term; and
 - responsive, particularly in relation to proposals that would supply significant development capacity.

Objective 8: New Zealand's urban environments:

- - support reductions in greenhouse gas emissions; and
 - are resilient to the current and future effects of climate change.

Policy 1: Planning decisions contribute to well-functioning urban environments...

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

...the benefits of urban development that are consistent with well-functioning urban environments; any relevant contribute that will be made to meeting the requirements of the NPS-UD to provide or realise development capacity.

Policy 8: Local authority decisions affecting urban environments are responsible to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:

- ...unanticipated by RMA planning documents; or
- ...out of sequence with planned land release.

As set out above, capacity assessments undertaken by the GCP have confirmed a shortfall in available land for housing in the Selwyn district in the medium term. More recent analysis undertaken by Market Economics indicates that any remaining capacity which would contribute to a well-functioning urban environment could be exhausted by 2026-2028. A failure to address that capacity shortfall will have a significant impact on affordability of housing, particularly in areas in and around the Rolleston town centre.

In that context, through the provision of 930 homes over the next decade, the project will deliver significant development capacity to an area of high demand. Further it will enable more people to live in an urban environment which is close to a centre zone and where, based on population projections and the shortfall in land supply, there is high demand for housing relative to surrounding areas. The location and layout of the project, as well as the provision of pedestrian and cycle ways, are intended to encourage alternative transport modes which will support reductions in greenhouse gas emissions. The project will also deliver a variety of homes at a range of typologies and prices (including affordable housing) to meet the needs of different households. Its close proximity to Rolleston and the key transport links into Christchurch, and the proposed provision of new, appropriately sized community facilities and reserves, will ensure good accessibility for residents.

While the project does not conform to the urban development pattern in the CRPS, action has been taken to include this land within the CRPS in response to the capacity assessments prepared by the GCP. Moreover, the NPS-UD now provides the mechanism by which out of sequence development can progress.

For these reasons, the project is wholly consistent with the objectives and policies of the NPS-UD.

Part IX: Purpose of the Act

Your application must be supported by an explanation how the project will help achieve the purpose of the Act, that is to “urgently promote employment to support New Zealand’s recovery from the economic and social impacts of COVID-19 and to support the certainty of ongoing investment across New Zealand, while continuing to promote the sustainable management of natural and physical resources”.

In considering whether the project will help to achieve the purpose of the Act, the Minister may have regard to the specific matters referred to below, and any other matter that the Minister considers relevant.

Project’s economic benefits and costs for people or industries affected by COVID-19:

According to StatsNZ, the number of people in the Selwyn district who have requested jobseeker support has more than doubled over the last 12 months. The most significant rise followed New Zealand’s entry into Alert Level 4, but the number is continuing to climb. Canterbury has the second highest number of recipients for income relief payments nation wide, while the number of people receiving accommodation supplements in the region has increased by 6,000 people since August 2019. In the construction sector, business confidence is currently sitting at -48%. While the Government’s pipeline of infrastructure projects is expected to support some additional capacity in the sector, forecasts indicate a fall in demand for housing and commercial projects as a result of the projected COVID-19-induced recession.

In that context, HDL commissioned Market Economics to undertake an economic assessment of employment that could be supported by the project. As part of that assessment, it also identifies the direct expenditure associated with the different phases of the project’s delivery, from consenting and land development through to construction and eventual occupation by residents.

In short, that report illustrates two main areas in which people or industries affected by COVID-19 may experience economic benefits as a result of the project. The first area relates to the expenditure associated with the actual delivery of the project and includes construction costs and indirect and induced value for businesses and staff who receive the benefit of that expenditure during the development phase. The second area is the increase in economic activity as a result of the new households residing in Rolleston. In summary:

- The economic impact of the project is assessed across a delivery timeframe of 7 years (between 2021 – 2028).
- The direct expenditure associated with the project was estimated for each year and over forty types of spending.
- The largest expenditure will occur during the dwelling construction phase, at a total of § 9(2)(b)(iii) spread from 2022 – 2028.
- Residents are expected to spend a total of § 9(2)(b)(iii) in the local economy over the same period. Once the development is complete, direct expenditure associated with the project will be approximately § 9(2)(b)(iii) per annum in the local economy.
- In total, the development of FSW and FSE will support approximately § 9(2)(b)(iii) in direct expenditure between 2022 and 2029.

The impact of this expenditure on the local economy is significant. Market Economics estimates that through supporting jobs and economic activity in other industries and locations, the economic impact of that expenditure would support **\$684m in GDP** over the development period.

Critically in terms of the Fast Track Act, while the medium-long term economic impacts of COVID-19 remain uncertain, there seems to be reasonable consensus that these impacts are likely to be acute over the next 24 months. As further set out below, if the project is to be approved through the standard RMA processes, the realisation of the economic benefits will be delayed potentially by up to three years (taking into account the requirement for a plan change and resource consents). By comparison, consenting the project through the Fast Track Act will accelerate the release of this expenditure and the employment opportunities it will provide to coincide with a time period in which they will likely be needed most.

Project's effects on the social and cultural wellbeing of current and future generations:

Social and cultural wellbeing is not defined in the Act or in the RMA. The Ministry of Social Development (**MSD**) however defines social wellbeing as “those aspects of life that society collectively agrees are important for a person's happiness, quality of life and welfare”. Drawing on nation-wide research data, MSD identifies those aspects to include health, standard of living, paid work, environment, safety, and social connectedness. Those aspects are similarly captured as components of wellbeing in Treasury's Living Standards Framework. Within that Framework, natural, social, financial/physical and human capitals are generators of wellbeing. Supporting current and future wellbeing means maintaining, nourishing and growing these capitals.

Housing, infrastructure and community facilities are examples of financial and physical capital, being assets that have a direct role in supporting incomes and material living conditions. Open green spaces are examples of natural capital, while social connections, mental and physical health, and people's skills are examples of social and human capital. Applying these concepts in the current context, the project will enhance the natural, social, financial/physical and human capitals of the Selwyn district in a manner which will positively impact the wellbeing of that community as it currently exists and in future. Specifically, it will:

- provide an additional 930 high quality, affordable homes in an area of high demand;
- contribute to ensuring on-going affordability of the surrounding area;
- deliver supporting community infrastructure which will be located and designed to facilitate community connection, opportunities for physical activity, and access to outdoor green spaces; and
- contribute § 9(2)(b)(iii) in direct expenditure to the local economy, and support employment for up to 12,800 job years over the next 5 - 8 years. This translates to 1550 jobs each year for the duration of the development project.

The project will have no adverse effects on cultural wellbeing.

Whether the project would be likely to progress faster by using the processes provided by the Act than would otherwise be the case:

Obtaining the requisite RMA approvals is the only remaining constraint on commencement and progression of this project. As it provides a faster process for obtaining consent, use of the Act rather than the RMA will enable the project to progress significantly faster than would otherwise be the case with resultant economic stimulus.

Obtaining consent for the project by way of a plan change and subsequent consents under the 'standard' RMA process is expected to take 2 – 4 years depending on appeals. Under that scenario, subdivision of the blocks could not occur until mid 2024 at the earliest but more likely 2025/2026. According to the analysis undertaken by Market Economics this will mean that housing capacity shortfalls in the residential housing market will have already been reached with resultant impacts on affordability and sustaining a competitive market.

Comparatively, consents must be processed under the Fast Track Act within a maximum timeframe of 70 working days, and there is no ability to appeal the expert panel's decision to the Environment Court. Under that process, a decision on a consent application lodged in March 2021 could be issued by June 2021, enabling HDL to progress the project significantly faster than would otherwise be the case and ensuring that the economic stimulus from the development and construction of the project occurs within the critical COVID 19 recession period.

In summary, an application for consent under the Act offers the fastest method to authorise the provision of further land for housing in Rolleston to address the identified shortfall, and to avoid the potentially significant impacts on affordability that could arise if additional capacity is not made available.

Whether the project may result in a 'public benefit':

Examples of a public benefit as included in Section 19(d) of the Act are included below as prompts only.

Employment/job creation:

Economic analysis undertaken by Market Economics estimates that over the course of the development period 2021 – 2028 (provided the project is fast tracked) a total of 12,400 job years will be generated. This translates to 340 additional jobs in the Canterbury region and 53 additional jobs in New Zealand in 2021 and 1168 additional jobs in the Canterbury region in 2021 with another 184 jobs generated in other parts of New Zealand.

In 2022 that number increases to 1618 additional jobs in Canterbury and another 253 in the wider New Zealand market. In 2024 the additional jobs peak at 2086 in Canterbury and 323 in New Zealand. These additional job numbers will provide a significant contribution to the economic recovery of Canterbury and New Zealand, particularly in the coming two years where unemployment rates are expected to remain well above average. This is particularly critical in the Canterbury region where economic indicators suggest that post earthquake adverse economic impacts were still occurring before the impact of COVID-19 on the economy.

Housing supply:

We included a discussion of how the project will benefit the public through increased housing supply in **Attachment 10**.

Contributing to well-functioning urban environments:

The layout of FSW and FSE and its various components has been configured to create, and to contribute to, a high quality, well-functioning urban environment as that phrase is defined in the NPS-UD.

Outline Development Plans have been prepared using best practice urban design principles that also achieve the outcomes envisaged in the Rolleston Structure Plan. Development in accordance with these Outline Development Plans (to be secured through conditions on consent) will:

- **Promote place-making, community and neighbourhood identity.** Specifically, the inclusion of a neighbourhood centre and a number of reserves supports the intention to promote social interaction and establish a heart to the precinct. Located on the corner of Springston Rolleston Road, with a primary collector which connects the site directly to the centre of Rolleston, the centre is, ideally located to take advantage of high visibility and greater passing traffic volumes to operate as a gateway into Faringdon. A network of green spaces will be embedded throughout the area in locations which will ensure all residents can access them on foot. In addition to providing opportunities for social engagement, the reserves will add amenity to the neighbourhood and enable a variety of active and passive recreation opportunities.
- **Prioritise walking and cycling.** Higher rates of walking and cycling have multiple benefits for both the local community and the environment through facilitating improvements in physical and mental health, amenity and safety of movement through corridors, and through reducing vehicle emissions. These transport options

will be promoted through provision of direct, dedicated, safe cycle routes on-road and through shared paths linking key destinations along visually interesting streetscapes.

- **Achieve efficient internal and external connectivity.** Ensuring movement corridors (vehicular, cycle and pedestrian) connect efficiently with surrounding areas is imperative in creating a cohesive community. As such, careful consideration has been given to the location and connection of these blocks to immediate neighbours, the wider Faringdon area, and greater Rolleston.
- **Deliver a diverse array of affordable housing typologies and sizes that are distributed in a coherent manner that responds appropriately to the surrounding environment.** The Outline Development Plans for both FSW and FSE will deliver residential development at a density of 12 householders per hectare. The layout for both blocks responds sensitively to its interfaces with both existing and future adjacent development and its urban/rural setting, and otherwise aligns with the design principles of the Rolleston Structure Plan.

As set out above, once developed, the project will also support a reduction in greenhouse gas emissions through the anticipated reduction in both travel time and reliance on vehicles.

Providing infrastructure to improve economic, employment, and environmental outcomes, and increase productivity:

HDL has commissioned a comprehensive assessment of the infrastructure which will be required to service the project (refer **Attachment 8**).

That infrastructure will be provided by HDL and will connect to Selwyn District Council's existing networks. The provision of that infrastructure will enable an increase in the supply of housing in the Selwyn district. As described above, the delivery and eventual occupancy of those homes will generate positive economic and employment outcomes for the surrounding community (which includes businesses and individuals impacted by COVID-19). The project will also promote the sustainable management of natural and physical resources as further articulated in the NPS-UD and the subsidiary RMA documents which give effect to it.

Improving environmental outcomes for coastal or freshwater quality, air quality, or indigenous biodiversity:

The project will not have any adverse impacts on coastal or freshwater quality or air quality. Consistent with HDL's other developments in the area, street and reserve plantings as part of the project will be dominated by native species. In that regard, the project will support the establishment and prosperity of indigenous biodiversity.

Minimising waste:

N/A

Contributing to New Zealand's efforts to mitigate climate change and transition more quickly to a low-emissions economy (in terms of reducing New Zealand's net emissions of greenhouse gases):

By providing housing capacity which is located in close proximity to both community infrastructure and employment opportunity, the project is expected to support a reduction in the extent of car travel which might otherwise occur. It will also provide infrastructure which will encourage alternative, lower-emissions forms of transport such as cycling. In that regard, if realised, the project will assist in facilitating a reduction in greenhouse gas emissions compared to what would otherwise result if that housing capacity was delivered further afield.

Promoting the protection of historic heritage:

N/A

Strengthening environmental, economic, and social resilience, in terms of managing the risks from natural hazards and the effects of climate change:

The housing delivered through this project will be designed in a manner which ensures its resilience and adaptability to natural hazard risks and the effects of climate including increasingly inclement weather events. In particular:

- As part of the works on the project, the lots will become elevated and the roads will be lowered. The roads will therefore operate as the secondary flow paths through the site in place of these natural channelized

routes. They will be designed to ensure the flood waters drain downwards through the sites to the rural land adjacent to the sites where the water can re-join the natural flow paths.

- The asphalt surface of the roads will increase the velocity of the water flows, which will in turn reduce water depths and allow the safe and efficient transfer of flood water through the site.
- With these mitigations in place, the adverse effects of significant flood events will be fully mitigated.

The project will also deliver 930 houses in an area there are no mapped faults located in proximity and the potential for liquefaction and lateral spreading on the site is considered to be very low.

For these reasons, the project will strengthen the resilience of the wider housing stock within Rolleston in terms of its ability to manage risks from natural hazards and the effects of climate change.

Other public benefit:

N/A

Whether there is potential for the project to have significant adverse environmental effects:

Technical assessments of the project indicate that it will not have any significant adverse environmental effects.

Part X: Climate change and natural hazards

Description of whether and how the project would be affected by climate change and natural hazards:

A flood report (included as **Attachment 9**) commissioned by the applicant has considered the potential effects of flooding on FSW and FSE, and how those effects might be mitigated. In short, it confirms that:

- There are clear channelized flow routes through the development areas in both blocks.
- All water flows up to a 1 in 50 year event will be disposed of on-site by infiltration to ground.
- As part of the works on the project, the lots will become elevated and the roads will be lowered. The roads will therefore operate as the secondary flow paths through the site in place of these natural channelized routes. They will be designed to ensure the flood waters drain downwards through the sites to the rural land adjacent to the sites where the water can re-join the natural flow paths.
- The asphalt surface of the roads will increase the velocity of the water flows, which will in turn reduce water depths and allow the safe and efficient transfer of flood water through the site.
- With these mitigations in place, the effects of significant flood events will be fully mitigated.

Geotechnical investigations have however also been undertaken in relation to FSE and FSW to identify the susceptibility of these sites to ground shaking and liquefaction. A letter summarising the findings of those investigations is included as **Attachment 5**. In short, there are no mapped faults in the immediate area. The movement of faults further afield (most likely, the Greendale Fault and the Port Hills Fault) could however result in some ground shaking. With regard to the liquefaction potential for the site, Engeo concludes that, consistent with a TC1 zoning, the potential for liquefaction and lateral spreading is very low, owing to the nature of the subsurface materials and the depth to groundwater.

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.

Based on available data, the applicant does not otherwise consider that the project would be otherwise affected by climate change.

Part XI: Track record

A summary of all compliance and/or enforcement actions taken against the applicant by a local authority under the Resource Management Act 1991, and the outcome of those actions:

Part XII: Declaration

I acknowledge that a summary of this application will be made publicly available on the Ministry for the Environment website and that the full application may be released if requested under the OIA.

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.

Lauren Semple

27/10/2020

Signature of person or entity making the request

Date

Important notes:

- Please ensure all sections, where relevant, of the application form are completed as failure to provide the required details may result in your application being declined.
- Further information may be requested at any time before a decision is made on the application.
- Please note that if the Minister for the Environment and/or Minister of Conservation accepts your application for referral to an expert consenting panel, you will then need to lodge a consent application and/or notice of requirement for a designation (or to alter a designation) in the approved form with the Environmental Protection Authority. The application will need to contain the information set out in Schedule 6, clauses 9-13 of the Act.
- Information presented to the Minister for the Environment and/or Minister of Conservation and shared with other Ministers, local authorities and the Environmental Protection Authority under the Act (including officials at government departments and agencies) is subject to disclosure under the Official Information Act 1982 (OIA) or the Local Government Official Information and Meetings Act 1987 (LGOIMA). Certain information may be withheld in accordance with the grounds for withholding information under the OIA and LGOIMA although the grounds for withholding must always be balanced against considerations of public interest that may justify release. Although the Ministry for the Environment does not give any guarantees as to whether information can be withheld under the OIA, it may be helpful to discuss OIA issues with the Ministry for the Environment in advance if information provided with an application is commercially sensitive or release would, for instance, disclose a trade secret or other confidential information. Further information on the OIA and LGOIMA is available at www.ombudsman.parliament.nz.

Checklist

Where relevant to your application, please provide a copy of the following information.

No	Correspondence from the registered legal land owner(s)
No	Correspondence from persons or parties you consider are likely to be affected by the project
No	Written agreement from the relevant landowner where the project includes an activity that will occur on land returned under a Treaty settlement.

No	Written agreement from the holder of the relevant customary marine title order where the project includes an activity that will occur in a customary marine title area.
No	Written agreement from the holder of the relevant protected customary marine rights recognition order where the project includes an activity that will occur in a protected customary rights area.

Released under the provision of
the Official Information Act 1982