

# 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: Holly Lea Village – Buildings D and E  
Application number: PJ-0000865  
Date received: 17/02/2023

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](mailto: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: Holly Lea Village Limited

Contact person: Graham Wilkinson

Job title: Director, Generus Living Group Limited

s 9(2)(a)

s 9(2)(a)

Postal address:

P O Box 3861, Christchurch 8140

### Address for service (if different from above)

Organisation: Greenwood Roche

Contact person: Amelia Alden

Job title: Associate

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s 9(2)(a)

Postal address:

PO Box 106006 Auckland 1143

## 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.

19, 19a, & 21 Tui Street, 121 & 123 Fendalton Road, And 2 & 8 Heathfield Avenue, Fendalton, Christchurch, 8041, New Zealand

The partially complete retirement village is situated on 1.95 hectares within the residential suburb of Fendalton. The site is boarded by major arterial route Fendalton Road to the north, and two local roads, Heathfield Avenue and Tui Street, to the east and west respectively. Waimairi Stream forms the southern boundary of the site.

A site location map is included as Appendix One.

Legal description(s):

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

Refer Appendix Two attached.

Registered legal land owner(s):

The applicant, Holly Lea Village Limited, is the sole owner.

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:

Holly Lea Village Limited has sole ownership of all land that is the subject of this application.

## Part III: Project details

### Description

Project name: Holly Lea Village – Buildings D and E

Project summary:

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

The application involves the construction of two three-storey apartment buildings, comprising a total of 30 units, to form part of the existing retirement village known as Holly Lea Village at 123 Fendalton Road (the Project).

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.

Holly Lea Village is an existing retirement village comprising 66 apartments and a soon-to-open 37 suite Aged Care Facility providing both hospital and memory assistance levels of care. A Master Plan for Holly Lea Village is attached as **Appendix Three** which provides an overview of the site layout and built form. Over the past five years, the applicant has purchased a number of adjacent properties to secure a contiguous land area and provide sufficient land to develop the village to meet further demand in the area. In addition to the original building (Main Lodge) of 38 units, an additional 28 units have recently been developed (Morven Apartments) and a 37 suite Aged Care Facility is nearing completion.

This application seeks referred project status for the two remaining apartments known as Building E (Heathfield Apartments) and Building D (Waimairi Apartments). The proposal will comprise the following:

- Building E which is a three-storey building that will contain 22 independent living units;
- Building D which is a three-storey building that will contain 10 independent living units;
- the maximum height of Building E will be 14.2m (including chimneys) while Building D will be 13.45m (including chimneys);
- both buildings will be built 2m from the fronting road boundaries;
- all units will have various configurations as shown in the application plans;
- staff and administrative functions;
- internal circulation and parking provision;
- extensive site landscaping; and
- earthworks for building foundations, site contouring, access and parking, and landscaping.

Further information can be found in the application plans attached as **Appendix Four**.

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

The development will be carried out in two stages:

- The first stage Building E (Heathfield Apartments) comprising 22 units. This stage will commence immediately after consent is received, likely July-August 2023.
- The second stage Building D (Waimairi Apartments) comprising ten apartments and a hydrotherapy pool. This stage will commence at the end of the first stage, programmed for early 2025.

Contractors are currently onsite constructing the Aged Care Facility. They are able to commence the first stage for Building E (Heathfield Apartments) as soon as they complete the Aged Care Facility (programmed to be completed in late March 2023), provided that consent for the Project is granted in time for the contractors to remain on site and build through.

The approximate construction period for Building E (Heathfield Apartments) is 15 months. The approximate construction period for Building D (Waimairi Apartments) is 14 months. The overall construction period will be approximately two and a half years from when consent is granted.

### Consents / approvals required

Relevant local authorities: Christchurch City Council, Environment Canterbury

Resource consent(s) / designation required:

Land-use consent, Water permit, 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
Part Lot 11 DP 2528, Lot 12, 13, 14 DP 2528, Units A and B DP 41792, Lot 1 DP 80748, Lot 2 DP 9117, Lot 1 DP 504692, Lot 2 DP 504692, Lot 16 DP 2528	Christchurch District Plan	Residential Suburban	<ul style="list-style-type: none"> <li>Christchurch International Airport Protection Surfaces</li> <li>Environmental Asset Waterway (Fendalton Stream)</li> <li>Flood Management Area</li> <li>Liquefaction Management Area</li> <li>Ngā Wai Lakes, Rivers and Streams</li> <li>Significant Individual Tree</li> <li>Minor arterial road (Fendalton Avenue)</li> <li>Local road (Heathfield Avenue and Tui Street)</li> </ul>	There are several Council owned trees within the road corridor of Fendalton Road and Heathfield Avenue that are in close proximity to the site.
Part Lot 11 DP 2528, Lot 12, 13, 14 DP 2528, Units A and B DP 41792, Lot 1 DP 80748, Lot 2 DP 9117, Lot 1 DP 504692, Lot 2 DP 504692, Lot 16 DP 2528	Canterbury Land and Water Regional Plan	N/A	<ul style="list-style-type: none"> <li>Christchurch Groundwater Protection Zone;</li> <li>Semi-confined/unconfined aquifer;</li> <li>Christchurch/West Melton Groundwater Allocation Zone;</li> </ul>	None

Legal description(s)	Relevant plan	Zone	Overlays	Other features
			<ul style="list-style-type: none"> <li>Red Nutrient Allocation Zone; and</li> <li>Environmental Flow and Allocation Limit Zone (Avon River).</li> </ul>	

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
Christchurch District Plan	5.4.1.1 Permitted activities P13 Filling or excavation in zones other than commercial, industrial, and rural zones that is not provided for under P10.	Part of the Site where Building D is proposed is within a Flood Management Area. Earthworks are proposed beyond the footprint of Building D, vehicle parking and manoeuvring areas, and landscaping, all of which will be carried out within the Flood Management Area.	Restricted Discretionary (Rule 5.4.1.5 RD2)	Whole site
Christchurch District Plan	Rule 5.5.3 Restricted discretionary activities	The Site is located in a Liquefaction Management Area, exceeds 1500m <sup>2</sup> in area, and triggers a non-compliance with 14.4.1.3 RD10 (Retirement Villages).	Restricted Discretionary (Rule 5.5.3 RD1)	Whole site
Christchurch District Plan	Rule 6.6.4.3 Restricted discretionary activities RD1 Earthworks	Earthworks (approx. 250m <sup>3</sup> ) for Building D and landscaping will be carried out within the 10m waterbody setback required for Waimairi Stream.	Restricted Discretionary (6.6.4.3 RD1)	Whole site
Christchurch District Plan	Rule 6.6.4.3 Restricted discretionary activities RD2 New buildings, other structures or impervious surfaces	Part of Building D (approx. 33.62m <sup>2</sup> ) will be located within the 10m waterbody setback required for Waimairi Stream.	Restricted Discretionary (6.6.4.3 RD2)	Whole site
Christchurch District Plan	Rule 6.6.4.4 Discretionary activities D1 Any activity listed in Rule 6.6.4.3, which is	Building D is adjacent to Waimairi Stream which is identified as a Site of Ecological	Discretionary (6.6.4.4 D1)	Whole site

	located adjacent to a water body identified as a Site of Ecological Significance listed in Schedule A of Appendix 9.1.6.1 (other than in the Central City).	Significance listed in Schedule A of Appendix 9.1.6.1.  As compliance with Rule 6.6.4.3 will not be achieved (building and earthworks within 10m waterbody setback), this rule is triggered.		
Christchurch District Plan	7.4.3.1 Minimum and maximum number and dimensions of car parking spaces required	The proposed aisle width of the car parks associated with Building E will be 6.3m where 6.6m is required and the visitor parking width dimensions are 2.5m, where 2.6m is required.	Restricted Discretionary (7.4.2.3 RD1)	Whole site
Christchurch District Plan	7.4.3.7 Access design	A compliant visibility splay cannot be provided for the Tui Street access as the fence columns will be within the splays.	Restricted Discretionary (7.4.2.3 RD1)	Whole site
Christchurch District Plan	7.4.3.10 High trip generators	As more than 60 residential units are provided across the entire Holly Lea Village site, this rule has been triggered.	Restricted Discretionary (7.4.2.3 RD1)	Whole site
Christchurch District Plan	8.9.2.1 Permitted activities: P1- Earthworks	Earthworks for the development will exceed 20m <sup>3</sup> across the site. The estimated volume will be 3,400-4,000m <sup>3</sup> at a maximum depth of 0.7m (excluding service trenching and building foundations).	Restricted Discretionary (9.4.4.1.3 RD5)	Whole site
Christchurch District Plan	9.4.4.1.3 Restricted Discretionary activities	Earthworks for building foundations of Building E and the re-laying of footpaths will extend 2m into the dripline of a significant tree (T106).	Restricted Discretionary (9.4.4.1.3 RD5)	Whole site
Christchurch District Plan	9.4.4.1.3 Restricted Discretionary activities	Earthworks for Building E foundations, hardstand, and landscaping will occur within the 5m of several trees located in the road corridor	Restricted Discretionary (9.4.4.1.3 RD8)	Whole site

		which exceed a height of 6m.		
Christchurch District Plan	Rule 14.4.1.3 RD10 – Retirement Villages	<p>Retirement villages that do not comply with any one or more of the activity specific standards in Rule 14.2.2.1 P7 are a restricted discretionary activity.</p> <p>While all buildings achieve recesses in the façade where they face a side or rear boundary, for Building E, these are not for the full height of the walls, and do not include a break in the eave line and the roof line of the façade.</p>	Restricted Discretionary (14.4.1.3 RD10)	Whole site
Christchurch District Plan	Rule 14.2.3.3 Building height	<p>The maximum height of Building E will be 14.2m (including chimneys) while Building D will be 13.45m when measured from original ground level.</p> <p>Note: Chimneys are only exempt where they do not exceed 1.1m in either direction.</p>	Restricted Discretionary (14.4.1.3 RD19)	Whole site
Christchurch District Plan	Rule 14.2.3.4 Site coverage	<p>The maximum allowable percentage of the net site area covered by buildings is 45%.</p> <p>The overall site coverage resulting from Building D (808.05m<sup>2</sup>) and E (1,213.26m<sup>2</sup>) site will be 45.2% or 8,969.31m<sup>2</sup> for the 19,859m<sup>2</sup> site.</p>	Restricted Discretionary (14.4.1.3 RD33)	Whole site
Christchurch District Plan	Rule 14.2.3.6 Daylight recession planes	<p>Building E will intrude the 27° recession plane on the southern internal boundary for a maximum depth of 1.5m.</p> <p>Building D will intrude the 26-29° recession plane on the southern</p>	Restricted Discretionary (14.4.1.3 RD20)	Whole site

		<p>internal boundary for a maximum depth of 1.7m.</p> <p>All other recession planes will be complied with.</p>		
Christchurch District Plan	Rule 14.2.3.9 Road boundary building setback	Both Buildings D and E will intrude the 4.5m road boundary setback for Fendalton Avenue, Tui Street and Heathfield Avenue (closest distance of 2m proposed).	Restricted Discretionary (14.4.1.3 RD25)	Whole site
Canterbury Land and Water Regional Plan	5.94A Construction phase stormwater	<p>Condition 4:</p> <p>A small portion of the Site is included on the LLUR due to a former underground diesel tank which was removed in 2006. Some soil disturbance (and associated potential stormwater discharge) may not meet Condition 4 of this rule.</p>	Restricted discretionary under Rule 5.94B	Whole site
Canterbury Land and Water Regional Plan	5.99 Discharge of water or contaminants into surface water	<p>Condition 6:</p> <p>Flocculants may be used to treat dewatering water prior to discharge to Fendalton Stream.</p> <p>Flocculants are a hazardous substance and that the discharge of flocculants to surface water requires consent.</p>	Discretionary under Rule 5.100	Whole site
Canterbury Land and Water Regional Plan	5.119 Site Dewatering	<p>Condition 6:</p> <p>In the event dewatering is required, this water may be discharged to Fendalton Stream which exceeds the rate of flow in those rivers.</p>	Restricted discretionary under Rule 5.120	Whole site
Canterbury Land and Water Regional Plan	5.136 Disturbance in the bed of a river	Earthworks may be required in the bed of Waimairi Stream associated with	Discretionary under Rule 5.141A.	Whole site



		naturalisation and retaining.		
Canterbury Land and Water Regional Plan	5.138 Defences against water	A retaining wall may be installed in the bed of Waimairi Stream and the works will not be undertaken by a local authority.	Discretionary under Rule 5.141A.	Whole site
Canterbury Land and Water Regional Plan	5.168 Earthworks in riparian areas	Condition 1: Earthworks within 5m of the bed of Waimairi Stream may be required and the area of earthworks may exceed 10% of the area of the riparian margin.	Restricted discretionary under Rule 5.169.	Whole site
Canterbury Land and Water Regional Plan	5.175 Earthworks over aquifers	Condition 2: There will likely not be more than 1m of undisturbed material between the base of excavations and the high water table. Excavations will also occur within 50m of both Fendalton and Waimairi Streams.	Restricted discretionary activity under Rule 5.176.	Whole site

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.

No resource consent applications have been made for the Project to date. However, various resource consents have been obtained in previous years for the existing Holly Lea Village at the site. These consents consist of the following:  
*Christchurch City Council* : RMA/2017/1057, RMA/2018/1915, RMA/2020/2605

*Canterbury Regional Council*:

- Building B and C (Morven Apartments): CRC192814, CRC192816, CRC192817, CRC192818
- Building A (Aged Care Facility): CRC213176, CRC213177, CRC213178, CRC213179

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

No resource consents / designations are required for the Project by anyone other than the applicant.

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:

Nil

### 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.

The applicant's intention is to commence development of the first stage (being Building E (Heathfield Apartments) comprising 22 units immediately on consent being received, which is anticipated to be early June 2023 (through the fast-track process).

The construction contractor is currently onsite completing the Aged Care Facility, with completion expected late March 2023. It is intended to engage the same contractor to continue work on the site and develop the Project and work can commence in July-August 2023.

Following completion of Building E (Heathfield Apartments), anticipated to be early 2025, development of the second stage Building D (Waimairi Apartments) comprising 10 apartments and a village hydrotherapy pool will commence. Completion of this stage is expected in April 2026.

Funding for the Project is being provided by ASB Bank. A letter from ASB Bank confirming available funds is attached as **Appendix Five**.

No delays are expected between stages of development and completion of the Project as soon as possible will be the applicant's priority. In all respects the Project is "shovel ready".

Key milestone dates:

- Start detailed design: Underway as assumed consent can be obtained.
- Funding: Approved with ASB.
- Building E start construction: July-August 2023 or when consent is granted.
- Building E finish construction: January 2025.
- Building D start construction: February 2025 - one month after completion of Building E.
- Building D finish construction: April 2026.

## Part IV: Consultation

### Government ministries and departments

Detail all consultation undertaken with relevant government ministries and departments:

The Ministry for the Environment was contacted via email on 20 January 2023 with an outline of the Project, accompanying summary documentation and notification of an intention to lodge an application seeking referral for the Project.

A pre-application meeting was held on 13 February 2023.

The applicant has not consulted with any other government ministries or departments.

### Local authorities

Detail all consultation undertaken with relevant local authorities:

The design of both apartment buildings was commenced in mid-2022 on the basis that Christchurch City Council's proposed Housing and Business Choice Plan Change (PC14) would be notified by Council in August 2022, and have immediate legal effect, as required by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. This plan change contains the Medium Density Residential Standards (MDRS). More recently, Council will be voting on an updated PC14 on 1 March 2023 which is likely to include a new qualifying matter to apply across the city, meaning no rules will have legal effect at the time of notification.

Despite the decision by Council not to notify PC14, the applicant has continued with the development as originally designed while the investigation by central Government into the Council's decision is underway. While it is unclear as to whether the MDRS provisions would have applied to retirement villages, regardless the development would largely

comply with MDRS provisions. While a direct permitted baseline comparison could not be applied, there would have been considerable merit in comparing an ‘anticipated environment’ scenario with the Project.

The applicant engaged in pre-application discussions with Council’s Resource Consents team in late 2022. These discussions centred on the possible adverse effects for consideration in the resource consent application and likely affected persons resulting from the development of Building E. The Council received draft plans of Building D which are generally the same as the finalised plans. Council staff were largely accepting that the adverse effects would not be significant but that several adjoining properties may be identified as affected unless mitigation was demonstrated. The applicant recently informed Council’s Resource Consents team that they were seeking referral under the COVID-19 Recovery (Fast Track Consenting) Act 2020 instead of relying on the traditional consent process. A summary of the application has also been provided to Environment Canterbury but no feedback has been provided to date.

### Other persons/parties

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

Based on Council advice, the following owners and occupiers may be affected by the Project:

- 4 Heathfield Avenue, south of Building E (Heathfield Apartments);
- 125, 1/127 and 2/127 Fendalton Road, west of Building E (Heathfield Apartments);
- 23 Tui Street, south of Building D (Waimairi Apartments); and
- 20 and 22 Tui Street, west of Building D (Waimairi Apartments).

No other persons or parties are considered to be affected by the Project.

Detail all consultation undertaken with the above persons or parties:

A copy of the plans and photo montages have been provided to the occupiers of 4 Heathfield Avenue who responded confirming their opposition to the Project due to the size and nature of the Project. It is the opinion of the applicant’s experts, as detailed below, that the bulk and scale effects of the Project are acceptable; however, the applicant will continue to engage with this neighbour as the Project progresses.

Based on preliminary assessments, it is the applicant’s view that no other parties are affected by the Project and accordingly have not engaged with these property owners to date.

## 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 Rūnanga o Ngāi Tahu	No consultation has been undertaken with Te Rūnanga o Ngāi Tahu. However, an email has been sent to the relevant local Rūnanga via Mahaanui Kurataiao Limited with respect to works adjacent to Waimairi Stream which is identified in the Christchurch District Plan as a Site of Ngāi Tahu Cultural Significance (Ngā Wai). An initial response has been received from Mahaanui Kurataiao Limited but due to time constraints, they were unable to provide formal feedback from the local Rūnanga before lodgement. Notwithstanding, the applicant acknowledges that further consultation will continue up to and during the consenting process.

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
As above.	

### 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 involve 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 – The Project is not within a customary marine title area.

### 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 – The Project is not within a protected customary rights area.

## 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.

Refer **Appendix Six**.

## 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 Statements and National Environmental Standards that are relevant to this Project are the:

- National Policy Statement on Urban Development 2020 (*NPSUD*).
- National Policy Statement for Freshwater Management 2020 (*NPSFM*).
- National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (*NESCS*).

*National Policy Statement on Urban Development 2020 (NPSUD)*

- Objectives 1, 2 and 4 of the NPSUD are of particular relevance to the Project. These objectives direct that:
  - Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
  - Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.
  - Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities and future generations.
- The Project will give effect to these objectives in the following ways:
  - The Project will utilise an existing residential site that is zoned for urban/residential development. It will create housing for older persons in an area of high demand and will have the consequential effect of freeing up housing stock in the immediate district and wider region as people move into the new buildings within the Holly Lea Village. In turn, this will allow future residents to provide for their social and economic wellbeing, along with their health and safety.
  - The Project will contribute to the overall supply of housing in the district, thereby contributing to housing affordability.
  - The site will be visible from other residential sites but is well separated from neighbouring residential development and designed appropriately such that it will sit comfortably within the area. Therefore, while the Project will introduce some change to the area, it is considered that any effects on amenity values will be acceptable overall, and entirely consistent with Objective 4 of the NPSUD.
  - The Project will provide further capacity to the Holly Lea Village, and will deliver a combined total of approximately 30 independent living units across the two buildings, helping to meet the needs of a high growth older persons community.
  - Accordingly, it is considered that the Project is strongly aligned with the objectives of the NPSUD.

*National Policy Statement for Freshwater Management 2020 (NPSFM)*

- Objective 1 and Policies 3 and 13 are relevant to the Project which seek to ensure:
  - That natural and physical resources are managed in a way that prioritises:
    - first, the health and well-being of water bodies and freshwater ecosystems;
    - second, the health needs of people (such as drinking water); and
    - third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.
  - That freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.
  - That the condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.
- Accordingly, the Project will ensure consistency with the above as:
  - the Project will be undertaken over a limited duration, with best practice in place to avoid sediment or contaminants entering into either waterbodies, or into groundwater. This will protect water quality in the aquifer.
  - Proposed plantings will enhance mahinga kai values and biodiversity of adjoining Waimairi Stream.
  - The site is not located in a Community Drinking Water Protection Zone or in close proximity to any Community Drinking Water Supply Bores. As such, this part of the objective is considered to be met.
  - The redevelopment of the site and erection of two further buildings to support the Holly Lea Village will result in positive effects for people and the community.
- It is therefore considered that the works proposed as part of the Project will give effect to the NPSFM.

- A search of Environment Canterbury's Listed Land Use Register (LLUR) identifies one location within the wider site that has contained a Hazardous Activities and Industries List (HAIL) activity, this being an underground storage tank which was removed in 2006. The area where this occurred is in the southern portion of the site, located within the existing access road on the site. The NESCS is not relevant to the Project in this instance as no soil disturbance is proposed within that area of the site. This approach has equally been applied under previous resource consents.

## 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:

The Project represents a significant investment in the local area through both the expansion and completion of the existing Holly Lea Village and its ongoing operation. Retirement villages and aged care have proved to be extraordinarily effective in combatting Covid-19 and completion of the village will ensure further accommodation is available for senior New Zealanders in a safe and supporting environment.

The economic impacts of the development have been assessed by Kieran McLean and Greg Akehurst of Market Economics Limited and their report is appended as **Appendix Seven**. Their assessment evaluates the degree to which the Project generates economic benefits for people and communities affected by the Covid-19 downturn, the impact that the Project will have on housing supply, and the specific economic benefits of utilising the fast-track process for the Project. In that respect, the economic benefits of bringing the Project forward through the fast-track process have been based on the timeframes as set out in the following section of the application. Given the uncertainty in decision making and appeals, Mr McLean and Mr Akehurst have used a mid-point of 11 months for the purposes of demonstrating the economic benefit of bringing the project forward.

By way of summary, Mr McLean and Mr Akehurst make the following conclusions:

- The development is projected to have a significant value-added impact of \$7.7m, directly, and a total impact of \$31.5m. Numerically, processing via the referred projects pathway, the development will generate a net additional contribution to GDP directly of approximately \$0.4m in current dollar terms, that is over and above the standard RMA development timeline. When indirect and induced impacts are considered, this rises to \$1.5m in current dollar terms.
- A larger number of local jobs can be sustained in the short-term future, with the enabling development works expected to begin in 2023, one year sooner than would be likely under a standard consent approach. While building consent data shows that recent levels of construction activity are likely to be maintained over the short term, the outlook beyond that is highly uncertain and there is a real risk that construction activity will rapidly slow, putting even more local jobs (and households) on the line.
- In terms of employment, the redevelopment will directly sustain approximately 108 full-time equivalent (FTEs) for a year. Once the flow on effects are included, this rises to employment equivalent to 418 workers for a year (418 FTEs). After completion, the Project will support 8 permanent FTEs.
- Once fully developed, the Project will provide further capacity to the existing retirement village, which has the potential to deliver a combined total of approximately 30 independent living units across the two buildings. Not only does this help meet the needs of a high growth community (the 65+ age group), but it potentially frees up established homes for first and subsequent home buyers assisting with housing market mobility.

There are opportunities through the Project for employment both locally, and for those in sectors that have been affected by Covid-19. Upon completion, the Project will create eight full time equivalent local jobs such as for caregivers and housekeepers. There will also be employment generated indirectly through demand on local services and suppliers for operating the village.

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

The development of retirement village dwellings such as those in proposed Buildings D and E of the Holly Lea Village would help to reduce land demand pressure and make further residential housing available. This increase in housing supply will help to relieve pressure on the housing market and will contribute towards improved housing affordability in the long term. Increase in housing supply and the corresponding realisation of the prospect of home ownership for younger generations provides opportunity for more secure accommodation than renting, and long term investment opportunities.

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

The Project is likely to proceed more quickly through the fast-track process as opposed to a traditional resource consent process. The table appended as **Appendix Eight** sets out the different timelines under each process. In summary, a limited notified consent (with hearing) will result in processing time of approximately 100 working days and 130 working days for a publicly notified consent (with hearing). Notwithstanding, this would likely be extended with requests for information and administrative tasks and, as such, an additional 30 working days should be factored into the timeline. The prospect of public notification (despite the applicant's position that public notification is not required) and the consequential risk of subsequent appeals to the Environment Court, would result in further significant processing delays to the Project. With an anticipated lodgement for a complete resource consent (mid-March), any decision would be unlikely to be made before November or December 2023 which does not factor in the possibility of appeals.

Factoring in processing times for referral applications to the Ministry for the Environment, it is expected that a referral decision may be made by the Minister before April 2023. Should the application be accepted and referred to the fast-track consenting process, a full application would be submitted to the Environmental Protection Authority April 2023, or earlier depending on referral timing. It is expected that a decision through the fast-track consenting process would be made early June 2023 which also removes appeal rights, thus significantly reducing timelines and providing assurance for project commencement to the applicant. Of note also, a benefit of the fast-track is that a larger number of local jobs can be sustained in the short-term future, with the enabling development works expected, one year sooner than would be likely under a standard consent approach. On that basis, the applicant is of the view that the fast-track process will significantly streamline consenting and ultimately decision making for this Project.

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:

Continued employment of various contractors and subcontractors and in particular the continuation of engagement on the same site.

In terms of employment, the redevelopment will directly sustain approximately 108 FTEs for a year. Once the flow on effects are included, this rises to employment equivalent to 418 workers working for a year. Upon completion, the Project will create eight full time equivalent local jobs such as for caregivers and housekeepers.

Housing supply:

For every new or existing apartment that is licensed in a retirement village, it is usual for a large family dwelling to be sold. The market for Holly Lea Village is the immediate Fendalton area and the Project may free up around 30 large dwellings for purchase to improve housing supply for others. These more established homes are often better located relative to work, public transport and amenities than brand new subdivision developments so are an important part of the market for first or subsequent home buyers.

#### Contributing to well-functioning urban environments:

The Project will result in the completion of Holly Lea Village which sits within an existing urban environment well suited for the retirement village. It is considered that the Project will achieve a positive interface with the surrounding residential environment, maintaining a high level of amenity for surrounding properties, and ensuring a private and secure environment for future village residents. Holly Lea Village is well located with respect to community services that residents will use, and easily accessed by staff using public transport.

The arrangement of access, parking and servicing have been assessed as being appropriately designed in either meeting the relevant provisions of the District Plan or industry recognised best practice standards, with traffic outcomes that match the needs of the Holly Lea Village. As is concluded in the ITA, the traffic activity of the proposed Buildings D and E fits in well with the local transportation and roading environment and can be developed to provide logical access and connectivity for a range of travel modes.

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

As detailed throughout the application, the Project would further contribute to improving housing infrastructure in the Fendalton area and through both construction and ongoing operations, would increase employment outcomes and productivity. Holly Lea Village is the only facility of its type in Fendalton.

The Project will also contribute significantly in development contributions for Christchurch City Council which will support local public growth infrastructure, public community reserves (including environmental initiatives) and employment from infrastructure and reserve projects.

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

The site adjoins and/or is intersected by two waterbodies (Waimairi Stream and Fendalton Stream), both of which have been taken into account in the design of the development. Detailed landscaping plans will include appropriate planting incorporated into the design near waterbodies to offset any waterbody intrusion. In addition, with respect to groundwater interception and stormwater discharge, various mitigation measures will be employed during construction any effects on those waterbodies will be acceptable.

#### Minimising waste:

Holly Lea Village will rely on traditional separation of general waste, organics, and recycling in line with services provided by Christchurch City Council. Various waste minimisation strategies will be employed both during construction and operation.

#### 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):

The Project would use land and construction resources efficiently given the increased density of the development and would enable optimal use of the site, within reason, to accommodate multiple people and families, instead of necessitating further lower density large dwellings to be constructed.

Holly Lea Village is also well located with respect to public transport to reduce the reliance on private vehicles.

#### Promoting the protection of historic heritage:

N/A – the site is not listed as having any historic heritage or archaeological importance.

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

The site is located within a Flood Management Area and Liquefaction Management Area, both of which are reasons for consent being sought. As discussed earlier, any adverse effects arising from these natural hazard considerations will be managed appropriately. Floor levels have been set with flooding in mind and earthworks across the site will be limited.



#### Other public benefit:

The proportion of New Zealand's population over 75 is anticipated to grow rapidly over the next 48 years. The Project would help to reduce the fiscal burden on the Government by supplementing the services provided by the District Health Board, as well as meeting the needs of older people in terms of carer burden that often falls on the working aged population.

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

As discussed earlier in Section 7 of this application, there is no potential for the Project to have significant adverse environmental effects. Any adverse effects will be avoided, remedied or mitigated to an acceptable level through consent conditions.

## Part X: Climate change and natural hazards

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

The assessment of environmental effects has taken into account the potential effects of climate change where relevant (flooding and liquefaction). The conclusions are that the Project is unlikely to give rise to adverse effects on seismic liquefaction, land stability, ground formation or settlement, and flooding and displacement of water.

## 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:

Local authority	Compliance/Enforcement Action and Outcome
Christchurch City Council	Nil
Environment Canterbury	Nil

## 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 will be released if requested.

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.

Amelia Alden

17/02/2023

**Signature of person or entity making the request**

**Date**

## Important notes:

- Please note that this application form, including your name and contact details and all supporting documents, submitted to the Minister for the Environment and/or Minister of Conservation and the Ministry for the Environment, will be publicly released. Please clearly highlight any content on this application form and in supporting documents that is commercially or otherwise sensitive in nature, and to which you specifically object to the release.
- 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](http://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.