

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for local authorities to provide comments to the Minister for the Environment on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Local authority providing comment	Christchurch City Council
Contact person (if follow-up is required)	David Falconer, Team Leader, City Planning
	Mark Stevenson, Team Leader, City Planning
	Click or tap here to enter text.

Comment form

Please use the table below to comment on the application.

Project name	Holmes Block Development & Skellerup Block Development
General comment – potential benefits	<p>Christchurch City Council (referred to hereafter as 'Council') is supportive of increasing the housing supply within the Greater Christchurch area in appropriate locations and is committed to providing affordable housing opportunities for Greater Christchurch.</p> <p>Through working in collaboration with partners to the Greater Christchurch Partnership, there is alignment as a partnership of the future urban form for Greater Christchurch. The project is not on land identified for future growth and is outside the defined 'Infrastructure Boundary' in Map A of the Regional Policy Statement.</p>
General comment – significant issues	<p>Reflecting Council's submission on Plan Change 73 to the Selwyn District Plan (attached), the Council has sought that the following issues are addressed to manage effects arising from development of the subject land: the downstream transport effects on Christchurch City and the residential density of the project. Council also raised concern with the implementation of the National Policy Statement Urban Development (NPS UD) and the relationship with the Canterbury Regional Policy Statement (CRPS).</p> <p>The significance of the development capacity provided, as required in Policy 8 of the NPS UD, needs to be determined in conjunction with the needs of the community that it is intended to support. Under the Selwyn District Plan Review 2020, no additional development areas were required to support growth in this area.</p> <p>Under the RMA, district plans are required to give effect to any national policy statement and regional policy statement. If a proposed change to a district plan will, if accepted, fail to give effect to a regional policy statement, then a change should be sought to the RPS either in advance or at the same time. The project has not sought a change to the CRPS.</p> <p>Council seeks alignment between the development of housing and delivery of public transport to facilitate a mode shift and increased use of public and active transport. There is currently no public transport services provided to the site, and no current or planned infrastructure upgrades</p>

	<p>identified to fund and increases public transport services. Over 40% of residents in Rolleston work or go to school in Christchurch City, largely in single occupancy vehicles. Council is unclear how this will achieve a reduction in greenhouse gas emissions, which is a requirement in the definition for a well-functioning urban environment in the NPS-UD. In this context, any process to determine the appropriateness of the project on the subject land should include an assessment of the downstream effects and provision of public transport services to the subject land.</p> <p>The project is intending to provide 12 households per hectare (hh/ha). The Council through its submission, seeks a minimum density requirement of 15 hh/ha consistent with the recommendation of a Density Review commissioned by the Greater Christchurch Partnership, which is subject to further work through spatial planning. Increased densities would better achieve efficiencies in the coordination of land use and infrastructure, support mixed land use activities, support multi-modal transport systems and protect the productive rural land resources.</p>
Is Fast-track appropriate?	A fast-track is not considered appropriate for this project due to the particularly contentious nature of development outside the projected infrastructure boundary and the inconsistencies of this project with the CRPS and the NPS UD. Council also notes that the same development is already being progressed as a private plan change to the Selwyn District Plan (PC73).
Environmental compliance history	N/A
Reports and assessments normally required	N/A
Iwi and iwi authorities	N/A
Relationship agreements under the RMA	MOU for Greater Christchurch Partnership
Insert responses to other specific requests in the Minister's letter (if applicable)	
The question asked of Christchurch City Council is 'Please advise if you have any specific comments about the proposed development density (12 households per hectare) for these projects. Please include your reasons for any comments.'	The key finding of the Density Review commissioned by the Greater Christchurch Partnership is that a minimum density of 15 households per hectare (hh/ha) is 'optimal' in terms of greenfield land development and there are benefits to doing this. However, there are a number of identified constraints and issues raised in the review that need to be overcome to ensure that development at this density occurs in an effective way. The project does not identify any specific constraints and issues to achieving a density of 15 hh/ha.
Other considerations	N/A

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

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Local authority providing comment	Environment Canterbury
Contact person (if follow-up is required)	Aurora Grant
	Consents Planning Manager
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Holmes Block Development
General comment – potential benefits	No comment
General comment – significant issues	<p>Alignment with strategic growth planning</p> <p>As set out in our submission on Plan Change 73 to the Selwyn District Plan, urban development of this scale in this location is inconsistent with policy direction in the Canterbury Regional Policy Statement (CRPS) and the strategic sub-regional land use and infrastructure planning framework for Greater Christchurch. The application site is not identified as a Greenfield Priority Area for residential development and is located outside the projected infrastructure boundary shown on Map A in Chapter 6 of the CRPS. Additional development capacity for over 5,500 homes (anticipated) has already been identified in greenfield locations within the Rolleston projected infrastructure boundary, through Our Space 2018-2048: Greater Christchurch Settlement Pattern Update (the future development strategy for Greater Christchurch) and Proposed Change 1 to Chapter 6 of the CRPS.</p> <p>It has not been demonstrated that intensive residential development in this location will be supported with the appropriate infrastructure to enable the development to proceed quickly. Further, other 'live' plan change requests in the Rolleston area, which amount to approximately 300 hectares of land in excess of 3,500 additional households, could alter the most appropriate infrastructure options to facilitate future development. A strategic planning exercise is required to consider the most appropriate scale, direction and timing of any growth for the township, linked to a coordinated assessment of the available options to overcome identified infrastructure constraints.</p> <p>Transport</p> <p>The application site and the adjacent area of West Rolleston is not directly served by regular public transport. Development in this location is therefore likely to be dependent on private motor vehicle use. We also note that the scale of new households is unlikely to be matched with additional local employment opportunities. The proposed development could therefore result in increased commuter traffic to Christchurch City, potentially exacerbating strategic transport</p>

network issues downstream from the new motorway link and counter to greenhouse gas emission reduction objectives.

Reverse Sensitivity – Odour

Selwyn District Council's Pines Resource Recovery Centre (PRRC) is located immediately to the south of the site. This district wide facility:

1. Receives and composts organic waste and stores mature compost until this is removed in bulk loads by purchasers.
2. Receives, stores and compresses general waste for transport to landfill; and
3. Receives and stores numerous types of recyclable materials for transport to various recycling facilities by truck.

The site also receives and processes for sale various reusable items.

Selwyn District Council's Pines Wastewater facility, is also located immediately to the west of the PRRC, some 400m from the site.

The discharges to air from both of these activities are authorised by way of a current discharge consent. Notwithstanding this, residential urban development of the subject land could give rise to potential reverse sensitivity effects. The Pines Wastewater Treatment Plant and Pines Resource Recovery Park facilities comprise important strategic infrastructure for the Selwyn District. Our understanding is that Selwyn District Council intends to expand the current operations of both the WWTP and the RRP. Policy 6.3.5 (3) of the CRPS seeks to ensure the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained.

Construction-related activities

It is understood that a number of construction-related resource consents will be required from Environment Canterbury, which will be sought at a later stage. The proposal is likely to trigger the requirement for a discharge permit to discharge construction-phase stormwater into land during the subdivision development. The Water Race, along the western boundary of the site, which is considered a surface water body for the purposes of Rule assessment, will trigger the need for s9 land use consent for excavation. Further, a land use consent to excavate material over an aquifer may be required. These resource consents are likely to be relatively straightforward as long as on-site activities and contaminated land are appropriately managed through resource consent conditions.

Operational Discharges

It is understood that wastewater and water are to be reticulated and that operational phase stormwater from this development is proposed to be discharged on-site into land under a separate resource consent to be obtained from Environment Canterbury.

While there are no concerns about the proposal to discharge stormwater into land as such, the discharge of untreated or insufficiently treated stormwater into land is not considered to give effect to the concept of te Mana o te Wai and the associated hierarchy of obligations under the National Policy Statement for Freshwater Management 2020 (NPS-FM 2020). Such discharges of stormwater into land would not put the health and well-being of the underlying aquifer at the top of the three priorities, but rather promote the third priority over both the first and second priority.

If this proposal was to go ahead, Environment Canterbury recommends that for a subdivision of this size, lodgement of consent applications should occur progressively – as detailed investigations are completed. The planning framework under which Environment Canterbury is currently working will change over the next few years in response to the NPS-FW 2020, and therefore a progressive consenting approach would ensure that the development, as it progresses, is in keeping with the planning framework at the time that a new stage is developed, as the planning framework will likely change in order to give effect to the NPS-FM 2020.

Is Fast-track appropriate?	We do not consider the project is suitable for the fast-track consent process. It is more appropriate for the project to be considered as part of a strategic planning process or go through the standard consenting process under the RMA, including for the following reasons: (1) The application site was not considered through previous comprehensive strategic planning processes and is located outside the projected infrastructure boundary, and detailed planning relating to freshwater and urban development is yet to be completed. (2) There is the potential for significant adverse effects, including in relation to urban form, public transport and infrastructure provision, and reverse sensitivity. We are concerned that these effects will not be adequately resolved within the constraints of the fast-track consent process. (3) The regional and sub-regional strategic planning framework does not support urban development of this scale in this location. Intensive residential development in this location is unlikely to be supported with the appropriate infrastructure to enable the development to proceed quickly. This casts doubt as to whether the project meets the purpose of the FTCA and particularly whether the project contributes to a well-functioning urban environment (section 19(d)(iii)). (4) A private plan change request to rezone the application site was publicly notified by the Selwyn District Council on 31 March 2021 (PC73). A standard consenting process would allow greater opportunity for public participation, appropriate to the nature and scale of the proposed development.
Environmental compliance history	There is no record of any environmental compliance or enforcement issues for Rolleston West Residential Limited or Carter Group Limited.
Reports and assessments normally required	Assessments of effects on groundwater quality and quantity, groundwater users and cultural values.
Iwi and iwi authorities	Te Taumutu Rūnanga and Te Rūnanga o Ngāi Tahu
Relationship agreements under the RMA	N/A
Insert responses to other specific requests in the Minister's letter (if applicable)	<p>1. Are there any reasons that you consider it more appropriate for these projects, or part of these projects, to proceed through existing Resource Management Act 1991 (RMA) plan change and consenting processes rather than the processes in the FTCA? In particular, please comment on whether the FTCA process is appropriate in light of the existing and proposed regional planning policy which does not provide for this level of residential intensification on this site.</p> <p>For the reasons set out above, we consider it is more appropriate for the project to be considered as part of a strategic planning process or go through the standard consenting process under the RMA.</p> <p>2. Please advise if you have any specific comments about the proposed development density (12 households per hectare) for these projects. Please include your reasons for any comments particularly if this differs from existing and proposed regional planning policy.</p> <p>Future housing needs have been identified in the most recent capacity assessment prepared for the Greater Christchurch area. The capacity assessment highlights the continued trend towards smaller household size (i.e. fewer people per household) and the future affordability constraints many households will face in accessing housing. Furthermore, a recent report into densities commissioned by the Greater Christchurch Partnership has concluded that, on a case-by-case basis, 15 households per hectare is both desirable and feasible as the minimum net density in new greenfield areas.</p> <p>3. Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your region?</p> <p>There is no record of any environmental compliance or enforcement issues for Rolleston West Residential Limited or Carter Group Limited.</p>
Other considerations	The proposed activity is not prohibited under Regional Plan Rules or relevant RMA Regulations including the National Environmental Standards for Freshwater.

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

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Local authority providing comment	Environment Canterbury
Contact person (if follow-up is required)	Aurora Grant
	Consents Planning Manager
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Skellerup Block Development
General comment – potential benefits	No comment
General comment – significant issues	<p>Alignment with strategic growth planning</p> <p>As set out in our submission on Plan Change 73 to the Selwyn District Plan, urban development of this scale in this location is inconsistent with policy direction in the Canterbury Regional Policy Statement (CRPS) and the strategic sub-regional land use and infrastructure planning framework for Greater Christchurch. The application site is not identified as a Greenfield Priority Area for residential development and is located outside the projected infrastructure boundary shown on Map A in Chapter 6 of the CRPS. Additional development capacity for over 5,500 homes (anticipated) has already been identified in greenfield locations within the Rolleston projected infrastructure boundary, through Our Space 2018-2048: Greater Christchurch Settlement Pattern Update (the future development strategy for Greater Christchurch) and Proposed Change 1 to Chapter 6 of the CRPS.</p> <p>It has not been demonstrated that intensive residential development in this location will be supported with the appropriate infrastructure to enable the development to proceed quickly. Further, other 'live' plan change requests in the Rolleston area, which amount to approximately 300 hectares of land in excess of 3,500 additional households, could alter the most appropriate infrastructure options to facilitate future development. A strategic planning exercise is required to consider the most appropriate scale, direction and timing of any growth for the township, linked to a coordinated assessment of the available options to overcome identified infrastructure constraints.</p> <p>Transport</p> <p>The application site and the adjacent area of West Rolleston is not directly served by regular public transport. Development in this location is therefore likely to be dependent on private motor vehicle use. We also note that the scale of new households is unlikely to be matched with additional local employment opportunities. The proposed development could therefore result in increased commuter traffic to Christchurch City, potentially exacerbating strategic transport</p>

network issues downstream from the new motorway link and counter to greenhouse gas emission reduction objectives.

Reverse Sensitivity - odour

The site adjoins a property owned by Tegel Foods Ltd upon which a poultry operation occurs. No current consents are held for this operation from ECan and as such it appears that the owner is operating on the basis that it is a permitted activity under the Canterbury Regional Air Plan. The introduction of additional sensitive activities in the vicinity increases the potential for reverse sensitivities.

Construction-related activities

It is understood that a number of construction-related resource consents will be required from Environment Canterbury, which will be sought at a later stage. The proposal is likely to trigger the requirement for a discharge permit to discharge construction-phase stormwater into land during the subdivision development. The Water Race, along the western boundary of the site, which is considered a surface water body for the purposes of Rule assessment, will trigger the need for s9 land use consent for excavation. Further, a land use consent to excavate material over an aquifer may be required. These resource consents are likely to be relatively straightforward as long as on-site activities and contaminated land are appropriately managed through resource consent conditions.

Operational Discharges

It is understood that wastewater and water are to be reticulated and that operational phase stormwater from this development is proposed to be discharged on-site into land under a separate resource consent to be obtained from Environment Canterbury.

While there are no concerns about the proposal to discharge stormwater into land as such, the discharge of untreated or insufficiently treated stormwater into land is not considered to give effect to the concept of te Mana o te Wai and the associated hierarchy of obligations under the National Policy Statement for Freshwater Management 2020 (NPS-FM 2020). Such discharges of stormwater into land would not put the health and well-being of the underlying aquifer at the top of the three priorities, but rather promote the third priority over both the first and second priority.

If this proposal was to go ahead, Environment Canterbury recommends that for a subdivision of this size, lodgement of consent applications should occur progressively – as detailed investigations are completed. The planning framework under which Environment Canterbury is currently working will change over the next few years in response to the NPS-FW 2020, and therefore a progressive consenting approach would ensure that the development, as it progresses, is in keeping with the planning framework at the time that a new stage is developed, as the planning framework will likely change in order to give effect to the NPS-FM 2020.

Is Fast-track appropriate?

We do not consider the project is suitable for the fast-track consent process. It is more appropriate for the project to be considered as part of a strategic planning process or go through the standard consenting process under the RMA, including for the following reasons: (1) The application site was not considered through previous comprehensive strategic planning processes and is located outside the projected infrastructure boundary, and detailed planning relating to freshwater and urban development is yet to be completed. (2) There is the potential for significant adverse effects, including in relation to urban form, public transport and infrastructure provision, and reverse sensitivity. We are concerned that these effects will not be adequately resolved within the constraints of the fast-track consent process. (3) The regional and sub-regional strategic planning framework does not support urban development of this scale in this location. Intensive residential development in this location is unlikely to be supported with the appropriate infrastructure to enable the development to proceed quickly. This casts doubt as to whether the project meets the purpose of the FTCA and particularly whether the project contributes to a well-functioning urban environment (section 19(d)(iii)). (4) A private plan change

	request to rezone the application site was publicly notified by the Selwyn District Council on 31 March 2021 (PC73). A standard consenting process would allow greater opportunity for public participation, appropriate to the nature and scale of the proposed development.
Environmental compliance history	There is no record of any environmental compliance or enforcement issues for Rolleston West Residential Limited or Carter Group Limited.
Reports and assessments normally required	Assessments of effects on groundwater quality and quantity, groundwater users and cultural values.
Iwi and iwi authorities	Te Taumutu Rūnanga and Te Rūnanga o Ngāi Tahu
Relationship agreements under the RMA	N/A
Insert responses to other specific requests in the Minister's letter (if applicable)	<p>1. Are there any reasons that you consider it more appropriate for these projects, or part of these projects, to proceed through existing Resource Management Act 1991 (RMA) plan change and consenting processes rather than the processes in the FTCA? In particular, please comment on whether the FTCA process is appropriate in light of the existing and proposed regional planning policy which does not provide for this level of residential intensification on this site.</p> <p>For the reasons set out above, we consider it is more appropriate for the project to be considered as part of a strategic planning process or go through the standard consenting process under the RMA.</p> <p>2. Please advise if you have any specific comments about the proposed development density (12 households per hectare) for these projects. Please include your reasons for any comments particularly if this differs from existing and proposed regional planning policy.</p> <p>Future housing needs have been identified in the most recent capacity assessment prepared for the Greater Christchurch area. The capacity assessment highlights the continued trend towards smaller household size (i.e. fewer people per household) and the future affordability constraints many households will face in accessing housing. Furthermore, a recent report into densities commissioned by the Greater Christchurch Partnership has concluded that, on a case-by-case basis, 15 households per hectare is both desirable and feasible as the minimum net density in new greenfield areas.</p> <p>3. Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your region?</p> <p>There is no record of any environmental compliance or enforcement issues for Rolleston West Residential Limited or Carter Group Limited.</p>
Other considerations	The proposed activity is not prohibited under Reginal Plan Rules or relevant RMA Regulations including the National Environmental Standards for Freshwater.

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This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Greater Christchurch Partnership
Contact person (if follow-up is required)	Anna Elphick, Acting Manager, Greater Christchurch Partnership
	s 9(2)(a)
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Holmes Block Development and Skellerup Block Development
General comment	<p>Introductory comments</p> <ol style="list-style-type: none"> 1. The Greater Christchurch Partnership (the Partnership) thanks the Ministry for the Environment for the opportunity to provide comment on the applications - Holmes Block Development and Skellerup Block Development. 2. Please note that you will separately receive comments from the Christchurch City Council, Selwyn District Council and Environment Canterbury who are aligned in, and support, the comments made herein. Their comments offer more detail and respond to the specific questions you have asked those Councils. 3. The Partnership is supportive of increasing the housing supply within the Greater Christchurch area in appropriate locations and is committed to providing affordable housing opportunities for Greater Christchurch. 4. Through working collaboratively together, the Partnership have developed a shared and consistent view of the future urban form for Greater Christchurch. <p>Strategic planning context</p> <ol style="list-style-type: none"> 5. <i>Our Space 2018-2048: Greater Christchurch Settlement Pattern Update Whakahāngai O Te Hōrapa Nohoanga</i> (Our Space 2018-2048) was endorsed by

the Partnership in June 2019 and subsequently adopted by each partner Council. It is the future development strategy for Greater Christchurch developed under the National Policy Statement on Urban Development Capacity (NPS-UDC).

6. Our Space 2018-2048 updates the settlement pattern originally set out in the Greater Christchurch Urban Development Strategy (UDS) from 2007 and underpins the planning framework outlined in Chapter 6 to the CRPS, inserted through a statutory direction as part of the Land Use Recovery Plan. Our Space 2018-2048 identifies sufficient development capacity to meet anticipated housing needs over a thirty year planning horizon out to 2048.
7. A significant amount of housing development capacity is already enabled by the CRPS. Our Space 2018-2048 indicates there is existing capacity for nearly 74,000 dwellings in Greater Christchurch, against a housing target of 86,600 (including the additional margins that were required by the NPS-UDC), between 2018 to 2048. Our Space sets out a proposed approach to meet the projected shortfall, which includes intensification in existing urban areas and the identification of new greenfield areas for urban housing (termed Future Development Areas (FDAs)) in Rolleston, Rangiora and Kaiapoi. These locations have been identified in long-term growth strategies since 2007 and signalled by the Projected Infrastructure Boundary on Map A in Chapter 6 of the CRPS.
8. A Proposed Change to Chapter 6 of the CRPS, to identify the FDAs on Map A and insert associated policy provisions, was notified in January 2021 under a Streamlined Planning Process. Density scenarios indicate that, at a minimum density of at least 12 households per hectare, the FDAs could collectively provide for over 10,000 homes.
9. The application site was also not included within the 'Urban Growth Overlay' notified as part of the proposed Selwyn District Plan in October 2020.
10. Further development capacity in Rolleston is not required to meet medium and long term housing targets, identified in Our Space 2018-2048 and expressed in the CRPS and Selwyn District Plan.

Holmes Block Development and Skellerup Block Development

11. These projects are outside of the areas identified for development in the Canterbury Regional Policy Statement (CRPS) and Our Space 2018-2038.
12. The Partnership is not supportive of the fast-track process for this project on the basis that it is inconsistent with policy direction in the CRPS and the strategic sub-regional land use and infrastructure planning framework for Greater Christchurch.
13. It is noted that these projects exceed the amount of housing and business capacity required to meet medium and long term targets, identified in Our Space 2018-2048 and expressed in the CRPS. Thus additional capacity is in excess of what is needed. Development in these areas is not meeting a capacity shortfall, but rather could delay other growth and urban regeneration areas identified in Our Space 2018-2048 (and where infrastructure, and the public transport system, has been already built or planned) from being developed and regenerated.

	<p>14. The Partnership is of the view that future developments in Greater Christchurch would be more appropriately considered through the Greater Christchurch Spatial Plan process, recently commenced by the Partnership which will also look to satisfy the requirement under the National Policy Statement on Urban Development to prepare a Future Development Strategy under the National Policy Statement on Urban Development (NPS-UD).</p> <p>15. The Partnership also notes that the same development is being progressed as a private plan change to the Selwyn District Plan (PC73).</p> <p>16. The key issues arising from the submissions on PC73 are further detailed in the comments to you from the Selwyn District Council and are summarised here for your reference as:</p> <ul style="list-style-type: none"> • Increased traffic including, downstream traffic impacts to the city • Residential density • Integration of affordable housing; and • Reverse sensitivity effects, especially on our strategic infrastructure. <p>17. Should these applications be referred to an expert consenting panel for consideration under the FTCA, the Partnership requests an appropriate public participation process, including a hearing and inviting submitters on Plan Change 73 to provide comment.</p>
<p>[Insert specific requests for comment]</p> <p><i>'Please advise if you have any specific comments about the proposed development density (12 households per hectare) for these projects. Please include your reasons for any comments.'</i></p>	<p>Specific comments about the proposed development density (12 households per hectare)</p> <p>18. The key finding of the Independent 'Greenfield' Density Analysis Report commissioned by the Partnership is that a minimum density of 15 households per hectare (hh/ha) is 'optimal' in terms of greenfield land development and there are benefits to doing this.</p> <p>19. However, there are a number of identified constraints and issues raised in the review that need to be overcome to ensure that development at this density occurs in an effective way. The project does not identify any specific constraints and issues to achieving a density of 15 hh/ha.</p> <p>20. The Independent 'Greenfield' Density Analysis Report can be provided upon request.</p>

Released under the provision of
the Official Information Act 1982

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Local authority providing comment	Selwyn District Council
Contact person (if follow-up is required)	Tim Harris, Group Manager Environmental and Regulatory Services
	s 9(2)(a)
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Holmes Block Development and Skellerup Block Development
General comment – potential benefits	<p>Selwyn District Council (SDC) is not supportive of the applications under the COVID-19 Recovery (Fast-Track Consenting) Act 2020 (the Act) in this instance. However, SDC do acknowledge that the Fast Track Consenting Applications (FTCAs) may have advantages of speeding up the process to deliver housing supply, albeit in a location that is inconsistent with the strategic growth direction of Rolleston and Greater Christchurch.</p> <p>The two sites are currently subject to a private plan change request (Private Plan Change Request 73 (PC73)). PC73 is progressing through the statutory plan change process. Submissions closed on 3 May 2021 and are currently being summarised. It is anticipated that further submissions will be requested in early June, and a hearing will be held in the latter half of 2021. Considering the decision making timeframes, including the appeal period, PC73 may not be operative (if approved) until the end of the year. PC73 could then be subject to appeals on substantive matters that may add significant time to the process. Following any approval of PC73, the subdivision process will also need to occur before development is able to commence. Should the FTCAs follow due course and be approved, it could provide a decision and the ability to begin development some months ahead of the RMA process, without the added uncertainty of an appeal.</p>
General comment – significant issues	<p>SDC is not supportive of the application under the Act in this instance.</p> <p>As mentioned above, the two areas that are the subject of the FTCAs are currently subject to a private plan change request, being processed through a statutory process that SDC will make the final decision on. This process has been subject to public submissions, which has resulted in 49 submissions, a significant number of which have requested to be heard.</p>

SDC is also not supportive of the FTCA process, as it does not align with a number of planning documents and the strategic sub-regional land use and infrastructure planning framework for Greater Christchurch.

The FTCA process is not appropriate to occur for the following reasons:

1. The areas are outside the strategic planning residential development identified in the Rolleston Structure Plan.
2. The Future Development Strategy (FDS) for Greater Christchurch (known as 'Our Space') has not identified these areas as Future Urban Development Areas (FDAs) to support the medium to long-term growth within the Greater Christchurch area of Selwyn.
3. A Proposed Change to Chapter 6 of the CRPS, to identify the FDAs on Map A and insert associated policy provisions, was notified in January 2021 under a Streamlined Planning Process. As described above, the FTCA locations are not recognised as a FDA.
4. The areas have not been identified as an 'Urban Growth Overlay' in the Selwyn Proposed District Plan to recognise and protect this area for urban development in line with the above strategic directions.

The above processes, particularly the Rolleston Structure Plan and Our Space, have been through community consultation and hearing processes to set the strategic framework and growth direction for Rolleston and the Greater Christchurch Area. SDC is of the view that a development outside this strategic direction would be better to proceed through a full RMA process with hearing and appeal rights, to ensure community aspirations are fully considered. This will ensure the rights to challenge are not eroded and that there is a sense of 'natural justice' for the community for a development that is beyond that anticipated through the 10 plus years of strategic growth planning and management work undertaken by SDC and its partners.

Beyond the RMA processes, including PC73, consideration for growth in these locations, and others, will also be had through the Greater Christchurch Spatial Plan process. This spatial planning process, recently commenced by the Partnership, will also seek to satisfy the requirement under the National Policy Statement on Urban Development to prepare a Future Development Strategy.

While the FTCA notes that previous Plan Changes 8 and 9 (2011) tested the appropriateness of these sites to contain residential development through a public process, and as such residential development should not be unexpected on these sites, SDC is of the view that the scale and intensity of residential development proposed by the FTCA is significantly different of that approved through the previous process. As the current private plan change request seeks to substantially intensify residential development on the sites, and this process has significantly progress through the current RMA process, SDC considers that it is inappropriate to circumvent this process through the FTCA resource consent process.

Aside for the strategic considerations and concerns, there are specific operational issues for SDC, particularly in relation to Holmes Block. SDC are concerned that intensification of residential urban development on this site could give rise to reverse sensitivity effects, particularly with regard to the planned expansion of the Pines Wastewater Treatment Plant (WWTP) and the Pines Resource Recovery Park (RRP) (Refer to Appendix 1 for a map showing the location of SDC's strategic infrastructure, along with other activities within the general locality of the Holmes Block and Skellerup Block). These facilities comprise

important strategic infrastructure for the Selwyn District. Residential development encroaching on to this infrastructure may create inefficiencies and restrictions to future expansion, particularly where there is a need to obtain resource consents for discharge, whether to ground or air. The WWTP in particular services all the main townships in eastern Selwyn and it is proposed to also service Darfield, Kirwee, Leeston, Southbridge, Doyleston and the NZDF base at Burnham in the near future. Avoiding reverse sensitivity effects on this strategic infrastructure is paramount to their on-going function and ability to provide for growth, not just in relation to the FTCAs sites, but for the district as whole. This will be a key issue to consider through any process, whether that be PC73 or the FTCAs, but it is SDC preference that this consideration is through an RMA process given its requirements for a full and transparent hearing process on such matters and rights of appeal.

Should the Minister be of a view to refer the FTCAs, then SDC would be concerned about the reduction in public participation. If referred, the FTCAs would, in effect, circumvent the public process that has already commenced through the PC73 process. PC73 has been publically notified and has attracted submissions from 49 parties including Greater Christchurch Partners and the Ministry of Education. If the application is referred, it is SDC's strong recommendation that the Minister, under s24(2)(e) of the Act, invite comments from all the submitters on PC73. The submitters can be identified at:

<https://www.selwyn.govt.nz/property-and-building/planning/strategies-and-plans/selwyn-district-plan/plan-changes/plan-change-73,-rezone-approximately-160-hectares-of-living-3-to-living-z-and-business-1,-west-folleston>

It is also recommended that, if referred, the Minister direct that a hearing be held in accordance with clause 21 of Schedule 6 of the Act, so that those that do provide comments can be heard. If this occurs, the process will resemble to a degree the statutory process that would have otherwise occurred through PC73. Although SDC is not supportive of the process in this instance, the above would help satisfy SDC's concerns and provide for greater participation, transparency and due consideration of the issues should the Minister recommend referral of this project.

It is noted that the key issues arising from submissions that would need to be considered, either through an RMA process, or by a Panel should these FTCAs be referred, include:

- Increased traffic including impacts on the operation of State Highway 1, downstream traffic impacts and the facilitation of a mode shift and increased public transport to reduce these effects.
- Appropriateness of proposed residential density, and the need for commercial uses.
- Impact on, and adequate provision of, infrastructure including social infrastructure such as educational facilities.
- Noise and odour effects from existing activities.
- Reverse sensitivity effects of proposed intensification on existing activities, including Council's strategic infrastructure.
- Provision of infrastructure external to and between the two sites e.g. footpaths.
- Integration of affordable housing.

	Aside for the matters raised in submissions other key considerations are outlined further below in response the Minsters specific questions.														
Is Fast-track appropriate?	Not in this instance. As detailed above, this proposal is not aligned with local and sub-regional strategic planning, which has been subject to significant public participation processes. The sites within these FTCAs are also subject to a current RMA process that has been through a public participation processes, with a significant number people requesting to be heard. As such, SDC considers that it would be better to continue through an RMA process to allow those involved in the process full rights in considering this unplanned development.														
Environmental compliance history	<p>There have been number minor issues that, after investigation, either resulted in there being no issues or rectified promptly and professionally. Below is a list of the monitoring and compliance history of the applicant, or a company owned by the applicant:</p> <table border="1"> <thead> <tr> <th>SR Number</th> <th>Summary</th> </tr> </thead> <tbody> <tr> <td>16001474 Dust Complaint</td> <td>Complaint from a property on Main South Road about dust blowing onto their property possibly from the work at Iport or neighboring properties. Site visit by Compliance Officer took place and dust was not perceived to be an issue. No action required but file note made for any future complaints.</td> </tr> <tr> <td>17007066 Disposal of waste</td> <td>Prospective purchaser of land was worried about a small pile of rubbish/site scrape being contaminated and the potential for it to be buried on the site. They contacted SDC. SDC Compliance Officers spoke with the WEMT team (ECan) and no concerns were raised about content of the rubbish as being contaminated. The purchaser liaised directly with the developer and the waste pile was removed professionally.</td> </tr> <tr> <td>18004460 Construction Noise</td> <td>Complaint made from a member of the public about a concrete pour at the new school site on Southfield Drive, Lincoln at 3.30am. SDC spoke with the site manager and the next 3 concrete pours were scheduled for 6.30 am and to advise neighbouring properties.</td> </tr> <tr> <td>19005091 Signs</td> <td>The sign on a pole for Container Drive on the development was loose on a pole. The sign was reinstated securely.</td> </tr> <tr> <td>19007934 Noise and Vibration</td> <td>Property owner in Beaumont Drive, Rolleston thought he could feel and hear increased noise and vibration from the Iport development. Noise Control assessed the situation and identified increased noise from the motorway traffic but no noise or vibration caused by Iport and discussed this with the complainant.</td> </tr> <tr> <td>20002641 Dust Complaint</td> <td>Resident from Hoskyns Road felt the dust coming off the works being performed by a construction company on the corner of Hoskyns and Stoneleigh Drive, Rolleston, needed to be suppressed with water. Compliance Officers visited the site and there were no dust issues, but discussed the</td> </tr> </tbody> </table>	SR Number	Summary	16001474 Dust Complaint	Complaint from a property on Main South Road about dust blowing onto their property possibly from the work at Iport or neighboring properties. Site visit by Compliance Officer took place and dust was not perceived to be an issue. No action required but file note made for any future complaints.	17007066 Disposal of waste	Prospective purchaser of land was worried about a small pile of rubbish/site scrape being contaminated and the potential for it to be buried on the site. They contacted SDC. SDC Compliance Officers spoke with the WEMT team (ECan) and no concerns were raised about content of the rubbish as being contaminated. The purchaser liaised directly with the developer and the waste pile was removed professionally.	18004460 Construction Noise	Complaint made from a member of the public about a concrete pour at the new school site on Southfield Drive, Lincoln at 3.30am. SDC spoke with the site manager and the next 3 concrete pours were scheduled for 6.30 am and to advise neighbouring properties.	19005091 Signs	The sign on a pole for Container Drive on the development was loose on a pole. The sign was reinstated securely.	19007934 Noise and Vibration	Property owner in Beaumont Drive, Rolleston thought he could feel and hear increased noise and vibration from the Iport development. Noise Control assessed the situation and identified increased noise from the motorway traffic but no noise or vibration caused by Iport and discussed this with the complainant.	20002641 Dust Complaint	Resident from Hoskyns Road felt the dust coming off the works being performed by a construction company on the corner of Hoskyns and Stoneleigh Drive, Rolleston, needed to be suppressed with water. Compliance Officers visited the site and there were no dust issues, but discussed the
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		concern with the site manager who agreed to dampen down dust to prevent further complaints.
	21001355 Signs	Signs advertising Iport businesses placed on berms. Compliance Officers contacted the sign owners and the signs were removed and placed in the correct locations.
	21002440 Noise	Noise complaint from resident regarding a movement company situated in Iport Drive. Noise Control discussed issues with business owner who discussed the matter with staff and no further issues were raised.
Reports and assessments normally required	Planning Assessment Infrastructure Assessment Economic Assessment Transport Assessment Geotechnical Assessment Contaminated Land Assessments Urban Design Assessment Odour Assessment Acoustic Assessment	
Iwi and iwi authorities	Te Rūnanga o Ngāi Tahu Te Taumutu Rūnanga, Te Rūnanga o Ngāi Tūāhuriri	
Relationship agreements under the RMA	Relationship Agreement with Mahaanui Kurataiao Limited	
Insert responses to other specific requests in the Minister's letter (if applicable)	<p>1. Are there any reasons that you consider it more appropriate for these projects, or part of these projects, to proceed through existing Resource Management Act 1991 (RMA) plan change and consenting processes rather than the FTCA processes? In particular, please comment on whether the FTCA process is appropriate in light of the operative and proposed district plans which do not provide for this level of residential intensification on this site and proposed plan change 73 to the Selwyn District Plan.</p> <p>SDC consider it more appropriate that these projects continue to be considered under the RMA plan change process for the reasons outlined in this document above under 'General comment – significant issues'.</p> <p>The operative and proposed district plans have identified these areas for rural residential developments with accordance with SDC's Rural Residential Strategy. The Rural Residential Strategy sought to provide for locations appropriate 1 to 2 hh/ha. A key criteria to identify appropriate sites for the Rural Residential Strategy was that sites were not located in identified, or likely, township growth paths. The key reason for this being that development of that nature would likely frustrate, constrain and slow higher-density development as it would have to be retrofitted. The Holmes and Skellerup Blocks, although already zoned, were identified in the Rural Residential Strategy as future urban development to the west of Rolleston was not identified as a preferred growth path and</p>	

nor likely to be for a number of reasons but in particular due to their proximity to Strategic Infrastructure.

The Operative and Proposed District Plans have followed this strategic direction. In the case of the Proposed District Plan this has sought to uplift densities in other locations or protect areas for future urban development in line with the overall strategic direction outlined above under 'General comment – significant issues'.

- 2. Please advise if you have any specific comments about the proposed development density (12 households per hectare) for these projects. Please include your reasons for any comments particularly if it differs from existing and proposed district planning policy.**

The Proposed District Plan has a current policy direction to provide for 12hh/ha for new residential developments, however this is subject to challenge through submissions.

Through the Greater Christchurch Partnership, a review of residential densities was undertaken to determine what densities development were being developed at and what may be optimal for 'greenfield' developments. The key finding of the Independent 'Greenfield' Density Analysis Report commissioned is that a minimum density of 15 households per hectare (hh/ha) is 'optimal' in terms of greenfield land development and there are benefits to doing this. However this report also concluded that the appropriateness of how and where to achieve 15hh/ha was best determined through spatial planning to ensure it was desirable and feasible in any given location. For interim processes like the SDC Proposed District Plan, 12hh/ha was considered appropriate as a starting point. However, without the spatial planning consideration, it was envisaged that density would be considered through any zoning requests as to determine what densities were desirable and feasible in any given location, with a starting point that 15hh/ha was 'optimal' for 'greenfield' locations.

- 3. The applicant has advised that a roundabout is required at the SH1/Dunns Crossing Road intersection to cater for increased traffic generated by these projects. Are there any likely adverse effects of these projects on local traffic generation and road management? Please note that we have asked Waka Kotahi NZ Transport Agency for feedback on any likely effects on SH1.**

SDC is currently working with Waka Kotahi to address a number of traffic related issues in the locality of the sites.

The upgrade of the SH1 and Dunns Crossing/Walkers Rd intersection has been identified as one of the outcomes required from the NZUp Infrastructure Programme for the Rolleston SH1 Access Project relating to improved road safety and access. The Detailed Business Case phase is currently underway with Waka Kotahi and its consultants, of which the Council is a key stakeholder and is involved in all the processes in the progression of this.

It has been generally accepted that the SH1/Dunns Crossing Road intersection requires a significant safety upgrade to cater for existing and current traffic growth predictions for this part of Rolleston and also the state highway, even before PC73, and now these FTCAs, were identified. Should either process be approved, it is considered that both would significantly exacerbate the current situation by the extra traffic from the development areas using Dunns Crossing Road and the "natural" close access to and from SH1 at this

intersection. The existing intersection is considered a risk and currently temporary works and a speed restriction is in place on this section of the state highway to manage this.

As proposed in PC73, development of the Holmes Block would be limited to 97 lots, being the same that could be developed under the existing Living 3 zoning, until such time as the intersection upgrade had occurred.

Currently Waka Kotahi have identified that the intersection would be upgraded to a large roundabout. However there are significant technical challenges such as the proximity of the rail line and Runners Road intersection to accommodate the likely size required. It could be that the intersection upgrade realignment is pushed south to get around this, but land would need to be procured, which could take time. The business case to confirm the preferred option is not expected until the end of 2021. As such, SDC are concerned that may have the potential to impede delivery of a desired outcome. It is anticipated that Waka Kotahi would construct the intersection upgrade when the time came.

SDC has improvements planned to the existing roading network within the vicinity of the sites, being traffic signals at the Burnham School/Dunns Crossing Road intersection, however these are currently sitting outside the proposed LTP, and have been identified for 2032/33.

PC73 has identified additional improvements needed to the local network to respond to the proposed residential density, including traffic signals at the intersection of Dunns Crossing Road and Granite Drive. It is anticipated that, given the complexity of roading issues, the plan change process would provide for the consideration of the appropriateness of what, how and when roading upgrades, by all parties, would be needed to be progressed along Dunns Crossing Road.

4. Is three waters (stormwater, water supply and wastewater) infrastructure currently available to service these proposed developments? If not, when is it likely to become available?

The Rolleston water supply is sourced from deep ground water which is consented through Environment Canterbury consents (CRC175045, CRC160628, CRC193859 and CRC962217). As the township grows the consented allocation will be put under pressure. As such, priority of water allocation will need to be given to those developments/plan change requests within the Rolleston Infrastructure Boundary.

The Pines Wastewater Treatment Plant is the Council's central wastewater facility and is considered to be significant infrastructure. The ongoing expansion of the plant is critical to allow for the future growth of Rolleston and other townships that the plant treats.

Currently the Pines services Rolleston, Lincoln, Prebbleton, West Melton and Springston. In the future it is proposed that the townships of Darfield, Kirwee, Leeston, Southbridge, Doyleston and the NZDF base at Burnham will be connected to this plant.

Council is consulting on the expansion of the Pines, to cater for growth, as part of the 2021/22 LTP. The Pines is currently at or near capacity, with upgrades currently underway and additional upgrades planned and budgeted for in line with strategic planning work.

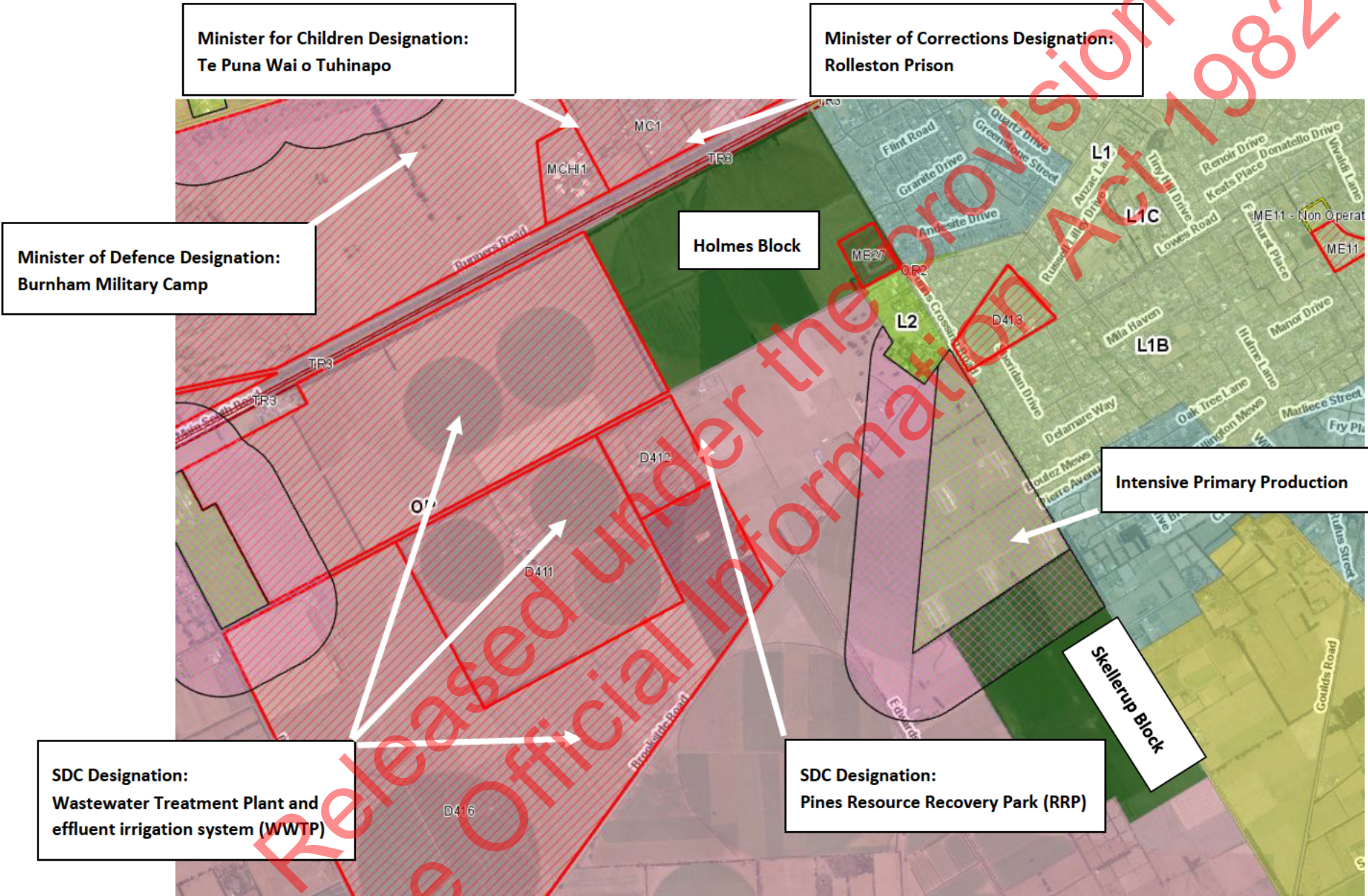
Council holds a significant number of resource consents for the treatment of wastewater at the Pines, which are due to expire between 2038 and 2045. Based on current

	<p>community growth trends, demand for wastewater services has the potential to exceed consented allowances in the future. This analysis is based on the Council’s population information, a detailed review of historical records and forward predictions of use, after factoring in potential climate changes as well as engineering staff / contractor knowledge. As such, the renewal of existing consents for the Pines is an ongoing issue, coordinating demand and utilisation requirements with consent expiry.</p> <p>Priority of wastewater capacity needs to be given to those developments within the Rolleston Infrastructure Boundary, and within the urban limits of those townships that currently connect into the Pines, or have been identified through the LTP to do so.</p> <p>SDC is of the view that no development should be allowed to occur where it would compromise the expansion of the plant in any way, in line with the plans outlined in the LTP.</p> <p>Stormwater disposal is to ground and will require a discharge consent from Environment Canterbury.</p> <p>5. Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your district?</p> <p>As discussed above, there have been number minor issues that after investigation either resulted in there being no issues or any issue rectified promptly and professionally.</p>
<p>Other considerations</p>	<p>Click or tap here to insert any other responses you consider relevant for the Minister to be aware of.</p>

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry’s proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

Released under the Official Information Act 1982

Appendix 1: Existing activities within the general locality of the Holmes Block and Skellerup Block





Te Rūnanga o NGĀI TAHU

20 May 2021

The Honourable Minister Parker
Ministry for the Environment
c/- Rebecca Perrett
Acting Manager, Fast-Track Consenting Team

Via email: fasttrackconsenting@mfe.govt.nz

Tēnā koe,

Holmes Block Development and Skellerup Block Development, Comments by Te Rūnanga o Ngāi Tahu

I am writing to provide comments on the proposal by Rolleston West Residential Limited (the applicant) to subdivide and construct new residential units in Rolleston under the Covid-19 Recovery (Fast-track Consenting) Act 2020.

This letter:

- i) Describes the status of Te Rūnanga o Ngāi Tahu as the relevant iwi authority able to make comments on this proposal in accordance with Clause 17(4)(b) of Schedule 6 to the Act; and
- ii) Provides comment on behalf of Te Rūnanga o Ngāi Tahu and relevant papatipu rūnanga who have been consulted in preparing these comments in accordance with clause 18(3)(b) of Schedule 6 to the Act.

1. Te Rūnanga o Ngāi Tahu and Papatipu Rūnanga

- 1.1 Ngāi Tahu are tangata whenua of the area which now forms Canterbury.
- 1.2 Ngāi Tahu means “people of Tahu” and Ngāi Tahu is the iwi comprised of Ngāi Tahu whānui; that is the collective of the individuals who descend from the five primary hapū: Ngāti Kuri, Ngāti Irakehu, Kati Huirapa, Ngāi Tūāhuriri and Ngāi Te Ruahikihiki.
- 1.3 Te Rūnanga o Ngāi Tahu is the iwi authority that represents Ngāi Tahu whānui as recognised in section 15 of Te Rūnanga o Ngāi Tahu Act 1996 (TRONT Act).
- 1.4 The takiwā of Te Rūnanga o Ngāi Tahu is described in section 5 of TRONT Act and includes all of Te Wai Pounamu/the South Island south from an approximate boundary centred on Belvedere Peak in the Nelson Lakes District across to the coastline of Cloudy Bay in Marlborough north-west of White Bluffs, and includes Queenstown Lakes District,

Te Rūnanga o Ngāi Tahu
15 Show Place, Addington, Christchurch 8024
PO Box 13-046, Christchurch, New Zealand
Phone + 64 3 366 4344, 0800 KAI TAHU
Email: info@ngaitahu.iwi.nz
Website: www.ngaitahu.iwi.nz

- Rakiura/Te Ara a Kiwa (Stewart Island) and offshore and sub-Antarctic islands.
- 1.5 Te Waipounamu has been home to Ngāi Tahu for over 800 years therefore Ngāi Tahu hold mana whenua over these lands.
 - 1.6 Te Rūnanga o Ngāi Tahu is comprised of 18 papatipu rūnanga, who collectively represent the hapū and whānau of Ngāi Tahu and their ancestors, including Ngāti Mamoe and Waitaha. Papatipu Rūnanga are defined in section 9 of the Act. The takiwā of each papatipu rūnanga is described in the Ngāi Tahu (Declaration of Membership) Order 2001.
 - 1.7 Papatipu rūnanga who have shared interests in this area are: Te Ngāi Tūāhuriri Rūnanga, and Taumutu Rūnanga.
 - 1.8 Te Rūnanga o Ngāi Tahu (Te Rūnanga) is statutorily recognised as the representative tribal body of Ngāi Tahu whānui and was established as a body corporate on 24th April 1996 under section 6 of TRONT Act. We note the following relevant provisions of our constitutional documents:
 - Section 3 of TRONT Act states:
“This Act binds the Crown and every person (including any body politic or corporate) whose rights are affected by any provisions of this Act.”
 - Section 15(1) of TRONT Act states:
“Te Rūnanga o Ngāi Tahu shall be recognised for all purposes as the representative of Ngāi Tahu Whānui.”
 - 1.9 The charter of Te Rūnanga o Ngāi Tahu constitutes Te Rūnanga as the kaitiaki of tribal interests.
 - 1.10 Notwithstanding its statutory status as the representative voice of Ngāi Tahu whānui “for all purposes”, Te Rūnanga o Ngāi Tahu accepts and respects the right of individuals and Papatipu Rūnanga to make their own responses.
 - 1.11 Section 15(2) of TRONT Act provides that where any enactment requires consultation with any iwi or with any iwi authority, that consultation shall, with respect to matters affecting Ngai Tahu whānui, be held with Te Rūnanga o Ngai Tahu.
 - 1.12 Section 15(3) of TRONT Act requires that in carrying out any consultation Te Rūnanga o Ngāi Tahu shall in turn consult with Papatipu Rūnanga. In practice, Te Rūnanga o Ngāi Tahu takes into account the views of Papatipu Rūnanga when determining its position. In the case of issues of local significance only, Te Rūnanga o Ngāi Tahu may defer a response completely to Papatipu Rūnanga.
 - 1.13 In the case of this application, Te Ngāi Tūāhuriri and Taumutu Rūnanga have previously been consulted on this application by the applicant. The report provided to the applicant remains valid and has been provided by their environmental entity Mahaanui Kurataiao Limited for the purposes of responding to this consultation request.

2. Comments on Holmes Block Development and Skellerup Block Development referral applications

General Comment

- 2.1 In addition to the introductory section above please see comments attached in report from Mahaanui Kurataiao Limited. The attached report assesses the proposal against the Mahaanui Iwi Management Plan and sets out recommendations with regard to the proposed development. In summary these are:
- Infilling of the Holmes Block waterway is avoided.
 - A minimum 10m setback is provided from all waterways.
 - A landscape plan should be developed utilising locally sourced indigenous planting.
 - All riparian areas should be planted to reduce contaminants reaching waterways.
 - An onsite flora and fauna assessment should be undertaken.
 - An Accidental Discovery Protocol should be in place to protect Wāhi Tapu and Wāhi Taonga.
 - Sediment control measures should be in place.
 - Future subdivision should include best practice stormwater management controls.
 - Recommendations from the Ngāi Tahu subdivision guidelines should be incorporated into the development.
 - Development should not occur in the recognised odour control area.
- 2.2 Based on the information available it difficult to ascertain exactly how the above has been incorporated into the development, including the treatment of the proposed diversion of the waterway in the Holmes Block. If the proposal progresses through the Fast-Track process, Papatipu Rūnanga and Te Rūnanga o Ngāi Tahu would appreciate the opportunity to consider and comment on the detail of the application.
- 2.3 In addition to the above, Te Rūnanga o Ngāi Tahu is a member of the Greater Christchurch Partnership. Te Rūnanga o Ngāi Tahu supports the response provided by the Greater Christchurch Partnership, particularly in relation to the application proposing additional capacity than expressed in the Canterbury Regional Policy Statement, Selwyn District Plan and Our Space 2018-2048.

Comment on density

- 2.4 A specific question asked in the consultation letter is “Please advise if you have any specific comments about the proposed development density (12 households per hectare) for these projects. Please include your reasons for any comments”
- 2.5 The proposed density considered in the report by Mahaanui Kurataiao is: Holmes Block, up to 1,150 properties and Skellerup Block, up to 950 properties. The proposal as set out in the application documents is Holmes Block, 1,052 units in total and Skellerup Block, 961 units in total.
- 2.6 The report does not focus on density but instead on the above areas of recommendation to avoid or manage adverse effects on the environment.

3. Decision Sought

3.1. Should the application progress through the Fast-track process, that:

- the recommendations on pages 5 and 6 of the attached report are implemented, and
- Papatipu Rūnanga and Te Rūnanga o Ngāi Tahu have the opportunity to consider the detail of the application further.

Nuku noa nā,



Trudy Heath
General Manager, Te Ao Tūroa

Address for Service:
Tanya Stevens
Senior Environmental Advisor
Te Rūnanga o Ngāi Tahu

s 9(2)(a)

Cc: Jason Eden, Mahaanui Kurataiao

Attachments: J3668-Rolleston West Plan Change-Client Report

Released under the provision of
the Official Information Act 1982

18th December 2020

To Rolleston West residential Limited
ATTN: Jeremy Phillips - s 9(2)(a)

Rolleston West Plan Change

Manawhenua Statement

Ngāi Tahu are tangata whenua of the Canterbury region and hold ancestral and contemporary relationships with Canterbury. The contemporary structure of Ngāi Tahu is set down through the Te Rūnanga o Ngāi Tahu Act 1996 (TRoNT Act) and, through this structure and this Act, sets the requirements for recognition of tangata whenua in Canterbury.

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

- Te Ngāi Tūāhuriri Rūnanga and Taumutu Rūnanga.

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

Assessment of Proposal

- An Outline Development Plan has been developed to facilitate a proposed plan change.
- The land is currently zoned living 3.
- The total area of the proposed plan change is 160ha and will allow for an average density of 13.1 households/ha in a variety of lot sizes.
- There are no NZAA Māori sites or sites of cultural significance identified in the planning maps for this area.
 - District Planning maps are not precise indicators of Māori historical associations.

- The plan change area is comprised of two blocks. The Holmes Block will contain up to 1,150 properties and the Skellerup Block will contain up to 950 properties.
- These blocks currently have areas where housing density is restricted due to potential reverse sensitivity effects on existing nearby waste management activities which discharge odour.
- These activities are the Rolleston Wastewater Treatment Plant, Rolleston Resource Recovery Park, and Tegel Foods intensive poultry farming sheds.
- The plan change would require either the extension of existing infrastructure from neighbouring subdivisions or the provision of a new water supply and wastewater infrastructure to service the development areas.

Evaluation in relation to Mahaanui Iwi Management Plan (MIMP)

The matters that are relevant to this particular proposal have been identified

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

Refer to guidelines attached as Appendix 1.

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

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

P6.5 To encourage the design of stormwater management systems in urban and semi urban environments to provide for multiple uses: for example, stormwater management infrastructure as part of an open space network that provides for recreation, habitat and customary use values.

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

Roof stormwater will be discharged to ground via soak pits. Treatment swales will be provided along road edges.

A detailed stormwater and wastewater design would be determined at the subdivision stage.

Stormwater discharge from hardstand areas such as roads and carparks should not be directed into waterways.

P11.1 To assess proposals for earthworks with particular regard to:

- (a) Potential effects on wāhi tapu and wāhi taonga, known and unknown;
- (b) Potential effects on waterways, wetlands and waipuna;
- (c) Potential effects on indigenous biodiversity;
- (d) Potential effects on natural landforms and features, including ridge lines;
- (e) Proposed erosion and sediment control measures; and
- (f) Rehabilitation and remediation plans following earthworks.

P11.8 To require the planting of indigenous vegetation as an appropriate mitigation measure for adverse impacts that may be associated with earthworks activity.

Planting and reserves would be confirmed at the subdivision stage. Appropriate indigenous species should be used across the site.

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

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

A water race crosses the site in the NW corner. This application states this would be realigned with the boundary.

A desktop ecological assessment of aquatic values has been carried out for both sites. It is considered likely the Holmes lot waterway contains Upland bully, Common bully, Brown trout and Shortfin eel. There are also potentially Kēkēwai present.

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

(1) That the mauri of freshwater resources (ground and surface) is protected and sustained in order to:

- (a) Protect instream values and uses (including indigenous flora and fauna);
- (b) Meet the basic health and safety needs of humans, specifically the provision of an untreated and reliable supply of drinking water to marae and other communities; and
- (c) Ensure the continuation of customary instream values and uses.

WM6.3 To require that clear and effective targets are established for restoring water quality in the takiwā, with immediate attention to:

- (a) Lowland and coastal streams; and
- (b) Groundwater.

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

- (b) Subdivision and development adjacent to waterways;

A minimum 10m buffer from all waterways is recommended.

WM13.7 To recognise the protection, establishment, and enhancement of riparian areas along waterways and lakes as a matter of regional importance, and a priority for Ngāi Tahu.

All riparian areas should be planted with locally sourced indigenous species.

CL3.3 To ensure that local and central government recognise that:

- (a) Existing schedules and maps of cultural sites are not comprehensive nor exhaustive;
- (b) Many sites and information about sites are held by whānau; and
- (c) Protecting wāhi tapu and wāhi taonga requires effective working relationships with Papatipu Rūnanga.

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

- (a) Low risk to sites:
 - (i) Accidental discovery protocol (ADP) - See Appendix 3 of the Mahaanui Iwi Management Plan.
- (b) High risk to sites:
 - (i) Cultural Impact Assessment (CIA).

The lack of identified wāhi tapu and wāhi taonga does not diminish the importance of the area to mana whenua. NZAA sites are indicators only and not a complete record of all significant landscapes. An Accidental Discovery Protocol should be in place during all excavations.

Conclusion

The kaitiaki of both Taumutu and Te Ngāi Tūāhuriri Rūnanga are concerned about the proposed realignment of the water race running through Holmes block and the potential impacts on biodiversity and habitat. The kaitiaki oppose the realignment and infilling of waterways that could potentially hold at risk indigenous species.

Taumutu Rūnanga questioned the efficacy of a desktop ecological survey for determining species present in the waterway. The kaitiaki queried whether invertebrate species have been appropriately accounted for.

The kaitiaki also questioned the suitability of siting dwellings in a potential odour constrained area and recommended future development plans be informed by the Ngāi Tahu Subdivision and Development Guidelines (attached in Appendix One). These guidelines provide a framework by which the adverse effects of development on cultural values may be minimized or avoided.

The applicant could require improved water efficiency throughout the site at the subdivision stage. Efficiency measures including greywater systems and rainwater collection could be appropriately incentivised or required under the Outline Development Plan to lessen pressure on resources and wastewater infrastructure.

Recommendations

- The applicant avoids the infilling of the Holmes block waterway and provide a minimum 10m setback between all waterways and development.
- A landscape plan be prepared utilising indigenous planting that is locally sourced.
- All riparian areas should be planted with appropriate species to reduce contaminants reaching water.
- An on-site assessment of the fauna present in the waterways be carried out to determine species present.
- To avoid effects on wāhi tapu and wāhi taonga, an Accidental Discovery Protocol should be in place during all earthworks that is consistent with Appendix 3 of the Mahaanui Iwi Management Plan.
 - All contractors should be made familiar with this.
- Any future works on site should have appropriate sediment controls to prevent runoff reaching waterways that are consistent with Environment Canterbury's Erosion and Sediment Controls.

- Future subdivision should incorporate best practice onsite stormwater management controls to mitigate the effects of development and allow for stormwater infiltration.
 - Hardstand areas should be directed to detention ponds and swales to reduce runoff from site and allow for infiltration.
 - Stormwater discharge from roads and carparks should not be directed to waterways.
- The applicant should incorporate the recommendations from the Ngai Tahu Subdivision Development Guidelines in the development, particularly with regards to stormwater controls and indigenous plantings.
- Development should not occur within a recognised odour constrained area.

Mahaanui Kurataiao and its staff are available to discuss this report further or assist in direct engagement with rūnanga if desired.

Report prepared by:

Jemma Hardwick-Smith

Environmental Advisor

Peer reviewed and approved for release by:

Jason Eden

Environmental Advisor | Team Leader

Appendix 1: Ngāi Tahu subdivision and development guidelines

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

Cultural landscapes

1.1 A cultural landscape approach is the most appropriate means to identify, assess and manage the potential effects of subdivision and development on cultural values and significant sites [refer Section 5.8 Issue CL1].

1.2 Subdivision and development that may impact on sites of significance is subject Ngāi Tahu policy on Wāhi tapu me wāhi taonga and Silent Files (Section 5.8, Issues CL3 and CL4).

1.3 Subdivision and development can provide opportunities to recognise Ngāi Tahu culture, history and identity associated with specific places, and affirm connections between tāngata whenua and place, including but not limited to:

- (i) Protecting and enhancing sites of cultural value, including waterways;
- (ii) Using traditional Ngāi Tahu names for street and neighborhood names, or name for developments;
- (iii) Use of indigenous species as street trees, in open space and reserves;
- (iv) Landscaping design that reflects cultural perspectives, ideas and materials;
- (v) Inclusion of interpretation materials, communicating the history and significance of places, resources and names to tāngata whenua; and
- (vi) Use of tāngata whenua inspired and designed artwork and structures.

Stormwater

2.1 All new developments must have on-site solutions to stormwater management (i.e. zero stormwater discharge off site), based on a multi-tiered approach to stormwater management that utilises the natural ability of Papatūānuku to filter and cleanse stormwater and avoids the discharge of contaminated stormwater to water [refer to Section 5.4, Policy P6.1].

2.2 Stormwater swales, wetlands and retention basins are appropriate land-based stormwater management options. These must be planted with native species (not left as grass) that are appropriate to the specific use, recognising the ability of particular species to absorb water and filter waste.

2.3 Stormwater management systems can be designed to provide for multiple uses. For example, stormwater management infrastructure as part of an open space network can provide amenity values, recreation, habitat for species that were once present on the site, and customary use.

2.4 Appropriate and effective measures must be identified and implemented to manage stormwater runoff during the construction phase, given the high sediment loads that stormwater may carry as a result of vegetation clearance and bare land.

2.5 Councils should require the upgrade and integration of existing stormwater discharges as part of stormwater management on land rezoned for development.

2.6 Developers should strive to enhance existing water quality standards in the catchment downstream of developments, through improved stormwater management.

Earthworks

3.1 Earthworks associated with subdivision and development are subject to the general policy on Earthworks (Section 5.4 Issue P11) and Wāhi tapu me wāhi taonga (Section 5.8, Issue CL3), including the specific methods used in high and low risk scenarios for accidental finds and damage to sites of significance.

3.2 The area of land cleared and left bare at any time during development should be kept to a minimum to reduce erosion, minimise stormwater run-off and protect waterways from sedimentation.

3.3 Earthworks should not modify or damage beds and margins of waterways, except where such activity is for the purpose of naturalisation or enhancement.

3.4 Excess soil from sites should be used as much as possible on site, as opposed to moving it off site. Excess soil can be used to create relief in reserves or buffer zones.

Water supply and use

4.1 New developments should incorporate measures to minimise pressure on existing water resources, community water supplies and infrastructure, including incentives or requirements for:

- (i) low water use appliances and low flush toilets;
- (ii) grey water recycling; and
- (iii) rainwater collection.

4.2 Where residential land development is proposed for an area with existing community water supply or infrastructure, the existing supply or infrastructure must be proven to be able to accommodate the increased population prior to the granting of subdivision consent.

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

Waste treatment and disposal

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

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

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

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

5.4 Where new wastewater infrastructure is required for a development:

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

Our Reference: EXC – 36 / 210521081364

21 May 2021

Rebecca Perrett
Acting Manager, Fast-Track Consenting Team
Ministry for the Environment – Manatū Mō Te Taiao
e-Mail: fasttrackconsenting@mfe.govt.nz

Dear Rebecca,

Re: COVID-19 Recovery (Fast-Track Consenting) Act 2020 - Holmes Block Development & Skellerup Block Development

Thank you for your letter (2020-B-07254) dated 10 May 2021 regarding your consideration of an application under the COVID-19 Recovery (Fast-Track Consenting) Act 2020. This relates to the Holmes Block Development & Skellerup Block Development, within Selwyn District.

Waimakariri District Council works in collaboration with its Greater Christchurch Strategic Partners on such matters, as part of the adopted Urban Development Strategy and the Greater Christchurch 20250 Strategy, which is under preparation.


The Greater Christchurch Partnership has resolved to make comment on the above mentioned application. The comments by the Partnership includes input of the Waimakariri District Council and Council supports those comments.

In terms of the specific question you ask, Council was a contributor to a Density Review commissioned by the Greater Christchurch Partnership. This study found that a minimum density of 15 households per hectare (hh/ha) is optimal in terms of greenfield land development and there are benefits to doing this. However, there are a number of identified constraints and issues raised in the review that need to be overcome to ensure that development at this density occurs in an effective way.

Waimakariri District Council is currently preparing development plans as part of its District Plan Review, taking on board the findings of the Density Review. Council notes that Selwyn District Council has similar actions stemming from the Density Review and has no further comment to make at this time on this specific matter.

Thank you for your letter and the opportunity to respond. Please email any further correspondence on similar matters to [s9\(2\)\(a\)](mailto:s9(2)(a)@wmk.govt.nz) and developmentplanning@wmk.govt.nz.

Yours sincerely


Jim Harland
Chief Executive

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	New Zealand Transport Agency (Waka Kotahi)
Contact person (if follow-up is required)	Stewart Fletcher – s 9(2)(a) Sarah White – s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Holmes Block Development
General comment	<p>The New Zealand Transport Agency (Waka Kotahi) is aware of the proposed development and has previously reviewed the proposal. The key issue is the timing and staging of any development on the site relative to the completion of the local intersection upgrade with State Highway 1. Other issues including land acquisition requirements, reverse sensitivity controls, and multimodal connections are also relevant, but can be more easily addressed.</p> <p>Please note this is one of two developments proposed on Dunns Crossing Road being considered under the COVID-19 Recovery (Fast-track Consenting) Act 2020. Separate comment is provided for the second proposal, being the Skellerup Block Development.</p>
<p>1. What are the outcomes of discussions undertaken with the applicant regarding the need for construction of the roundabout at the State Highway 1/Dunns Crossing Road intersection prior to development of part or all of these sites? In particular please clarify the following information:</p> <ul style="list-style-type: none"> • What is Waka Kotahi's understanding of who has responsibility for the roundabout construction? • What is the likely timing of the proposed roundabout construction? • If part of or all of the projects were developed prior to the roundabout construction, what would the likely effect be on State Highway 	<p>The Dunns Crossing Road/Walkers Road/State Highway 1 intersection is a priority-controlled, high-risk rural intersection located within a 100km/h speed limit and has existing safety concerns in terms of safety records and the number of near misses. Crash Analysis System (CAS) data between 2015-2019 shows 1 serious crash and 15 minor/non-injury crashes. Referring to the Waka Kotahi High Risk Intersection Guide (HRIG) the Personal and Collective risk is estimated as HIGH.</p> <p>The intersection is proposed to be upgraded as part of the New Zealand Upgrade Programme (NZUP) to address existing safety and network connectivity issues. Waka Kotahi will be solely responsible for the construction of the intersection upgrade.</p> <p>At this stage, the design for the intersection is unknown, though a roundabout is currently the preferred option. The timing for the intersection upgrade works is yet to be finalised, however, it is anticipated that works will commence in 2024.</p> <p>If part of or all of the project was developed prior to the upgrade of the intersection, given the existing safety issues, there would be a significant adverse safety effect on road users at the intersection.</p> <p>Prior to the application for fast track consenting, no discussions with the applicant had occurred, however a meeting was held with the applicant on Thursday 13th of May to discuss this fast track application and their plan change application currently lodged with Selwyn District Council (see further details below). The key issues discussed in this meeting were the timing and staging of any development on the site relative to the completion of intersection upgrades, land acquisition requirements, reverse sensitivity controls, and multimodal connections.</p> <p>Waka Kotahi reiterated the preference for no development to occur, or alternative measures to prevent an increase in vehicle movements, prior to the intersection upgrades being completed.</p>

	<p>The applicant was open to discussions about land requirements, reverse sensitivity controls and multi-modal connections, and was agreeable to working with Waka Kotahi to establish how these requirements can be incorporated into the development plans.</p>
<p>2. Please advise if you have any specific comments about the proposed development density (12 households per hectare) for these projects. Please include your reasons for any comments.</p>	<p>Waka Kotahi is a member of the Greater Christchurch Partnership who developed the document 'Our Space 2018-2048 Greater Christchurch Settlement Pattern Update' (Our Space). Our Space supports a minimum density of 12 households per hectare for new urban housing in the Selwyn District. Our Space identifies a 'Projected Infrastructure Boundary' and it is desirable to prioritise developments within this.</p> <p>In general, locations within the Projected Infrastructure Boundary will have in place a longer-term plan to provide the accessibility to employment and key services that supports the wellbeing of a community. In this instance, the proposal site is located at the fringe of the Rolleston Township and outside the Projected Infrastructure Boundary.</p> <p>Therefore, to provide a good range of sustainable transport choices for the proposed future population, this may require an increase of road capacity, public and active transport coverage, as well as ongoing operations and maintenance. The developer should consider and design their internal transport facilities to connect to the wider existing network. A collaborative approach to address this with Waka Kotahi and council will be required.</p>
<p>Other considerations</p>	<p>In addition to this application under the COVID-19 Recovery (Fast-track Consenting) Act 2020, the applicant has lodged a private plan change to the Selwyn District Plan as an alternative pathway to enable this same development.</p> <p>On 3 May 2021, Waka Kotahi lodged a submission in opposition to the proposed plan change. The issues identified in the submission were the same as discussed above. Based on the conversation with the applicant and expressed willingness to address these issues, it is anticipated that the majority of issues will be resolved.</p>

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

Released under the Official Information Act 1982

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	New Zealand Transport Agency (Waka Kotahi)
Contact person (if follow-up is required)	Stewart Fletcher – s 9(2)(a) Sarah White – s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Skellerup Block Development
General comment	<p>The New Zealand Transport Agency (Waka Kotahi) is aware of the proposed development and has previously reviewed the proposal. The key issue is the timing and staging of any development on the site relative to the completion of the local intersection upgrade with State Highway 1. Other issues including multimodal connections are also relevant but can be more easily addressed.</p> <p>Please note this is one of two developments proposed on Dunns Crossing Road being considered under the COVID-19 Recovery (Fast-track Consenting) Act 2020. Separate comment is provided for the second proposal, being the Holmes Block Development.</p>
<p>1. What are the outcomes of discussions undertaken with the applicant regarding the need for construction of the roundabout at the State Highway 1/Dunns Crossing Road intersection prior to development of part or all of these sites? In particular please clarify the following information:</p> <ul style="list-style-type: none"> • What is Waka Kotahi's understanding of who has responsibility for the roundabout construction? • What is the likely timing of the proposed roundabout construction? • If part of or all of the projects were developed prior to the roundabout construction, what would the likely effect be on State Highway 	<p>The Dunns Crossing Road/Walkers Road/State Highway 1 intersection is a priority-controlled, high-risk rural intersection located within a 100km/h speed limit and has existing safety concerns in terms of safety records and the number of near misses. Crash Analysis System (CAS) data between 2015-2019 shows 1 serious crash and 15 minor/non-injury crashes. Referring to the Waka Kotahi High Risk Intersection Guide (HRIG) the Personal and Collective risk is estimated as HIGH.</p> <p>The intersection is proposed to be upgraded as part of the New Zealand Upgrade Programme (NZUP) to address existing safety and network connectivity issues. Waka Kotahi will be solely responsible for the construction of the intersection upgrade.</p> <p>At this stage, the design for the intersection is unknown, though a roundabout is currently the preferred option. The timing for the intersection upgrade works is yet to be finalised, however, it is anticipated that works will commence in 2024.</p> <p>If part of or all of the project was developed prior to the upgrade of the intersection, given the existing safety issues, there could be a significant adverse safety effect on road users at the intersection. It is the preference of Waka Kotahi that no allotments are created until the intersection has been upgraded. Notwithstanding this, a more detailed understanding of the likely travel behaviour of drivers visiting/leaving the site might enable the ability to further consider the timing for the development of the site relative to the upgrade of the intersection.</p> <p>Prior to the application for fast track consenting, no discussions with the applicant had occurred, however a meeting was held with the applicant on Thursday 13th of May to discuss this fast track application and their plan change application currently lodged with Selwyn District Council (see further details below). The key issues discussed in this meeting were the timing and staging of any development on the site relative to the completion of intersection upgrades and multimodal connections.</p>

	<p>Waka Kotahi reiterated the preference for no development to occur, or alternative measures to prevent an increase in vehicle movements, prior to the intersection upgrades being completed.</p> <p>The applicant was open to discussions about multi-modal connections and was agreeable to working with Waka Kotahi to establish how these requirements can be incorporated into the development plans.</p>
<p>2. Please advise if you have any specific comments about the proposed development density (12 households per hectare) for these projects. Please include your reasons for any comments.</p>	<p>Waka Kotahi is a member of the Greater Christchurch Partnership who developed the document 'Our Space 2018-2048 Greater Christchurch Settlement Pattern Update' (Our Space). Our Space supports a minimum density of 12 households per hectare for new urban housing in the Selwyn District. Our Space identifies a 'Projected Infrastructure Boundary' and it is desirable to prioritise developments within this.</p> <p>In general, locations within the Projected Infrastructure Boundary will have in place a longer-term plan to provide the accessibility to employment and key services that supports the wellbeing of a community. In this instance, the proposal site is located at the fringe of the Rolleston Township and outside the Projected Infrastructure Boundary.</p> <p>Therefore, to provide a good range of sustainable transport choices for the proposed future population, this may require an increase of road capacity, public and active transport coverage, as well as ongoing operations and maintenance. The developer should consider and design their internal transport facilities to connect to the wider existing network. A collaborative approach to address this with Waka Kotahi and council will be required.</p>
<p>Other considerations</p>	<p>In addition to this application under the COVID-19 Recovery (Fast-track Consenting) Act 2020, the applicant has lodged a private plan change to the Selwyn District Plan as an alternative pathway to enable this same development.</p> <p>On 3 May 2021, Waka Kotahi lodged a submission in opposition to the proposed plan change. The issues identified in the submission were the same as discussed above. Based on the conversation with the applicant and expressed willingness to address these issues, it is anticipated that the majority of issues will be resolved.</p>

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

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