

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

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

For office use only:

Project name: Southern Parallel Sports Campus (the Campus)
Application number: PJ-0000881
Date received: 01/03/2023

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

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

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

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

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

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

Part I: Applicant

Applicant details

Person or entity making the request: Southern Parallel Sports Campus Limited (SPSCL)

Contact person: Catherine Stuart

Job title: CEO and Project Director

Phone: s 9(2)(a)

Email: s 9(2)(a)

Postal address:

Address for service (if different from above)

Organisation: Chapman Tripp

Contact person: Jo Appleyard / Lucy Forrester

Job title: Partner / Senior Solicitor

Phone: s 9(2)(a)

Email: s 9(2)(a)

s 9(2)(a)

Email address for service: s 9(2)(a)

Postal address:

Level 5, 60 Cashel Street, Christchurch Central 8013

Part II: Project location

The application: does not relate to the coastal marine area

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

Site address / location:

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

279 Stranges Road, Huntingdon, Canterbury, 7774, New Zealand

Legal description(s):

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

Lot 1 DP 43334, CB21F/859

Registered legal land owner(s):

Elizabeth Jane Small and Graeme Walter John Small

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

SPSCL has a signed contract to purchase the property from the legal land owners. The contract is conditional on consent being obtained. The legal owners have invested in the project and one appointed a Director. The JV agreement is based on an invested sum plus an agreed balance to make-up purchase price. Failing consent, the partners will move ahead with a joint development over a longer term. This is a fall back choice and one that will not deliver the benefits the SPSC Project will contribute to regional growth and job opportunity.

Part III: Project details

Description

Project name: Southern Parallel Sports Campus (the Campus)

Project summary:

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

The proposed Southern Parallel Sports Campus comprises state of the art facilities, being the Southern Parallel Sports Facility (the SPS Facility) and the Southern Parallel Equestrian Sports Facility (the SPES Facility).

Project details:

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

The scope of the project is to develop approximately 65 ha of land in Ashburton District for a veteran's rehabilitation facility and an equestrian centre. The development will comprise:

- Veterans rehabilitation centre:
 - An indoor sports facility (comprised of two Sprung structures);
 - A cricket and baseball field;
 - An athletics track and field;
 - A tennis court and pavilion;
 - 32 four bedroom townhouses;
 - A boat shed (not available for public use);
 - Greenhouses for growing vegetables for consumption on-site;
- Equestrian centre:
 - An indoor equestrian arena;
 - Indoor equestrian stables and a veterinary clinic;
 - A show jumping arena;
 - Two polo fields;
- Shared facilities servicing the veterans and equestrian centres:
 - A motel complex of 24 two bedroom units;
 - A café and restaurant;
 - A small maintenance facility;
 - Car parking comprising approximately 242 permanent car parks, and another 112 permanent spaces for horse floats and trucks;
 - Grassed overflow parking for a further 1,196 car parks and 284 horse float/truck parks;
 - Coach and mini-van park/drop-off/pick up spaces; and
 - A wastewater treatment system using a 'BioGill system';
 - A storage pond to treat wastewater;
 - Either a bridge or culvert over various locations of the existing waterways;
 - Enhancement of the existing waterways;
 - Landscaping including embankments and plantings;
 - Infrastructure and utilities associated with the above.

The sports facilities associated with the veterans rehabilitation centre will also be available for use by the public, schools and elite sports persons. The indoor equestrian arena will be available for occasional non-equestrian events.

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

There is no staging of the project. All facilities on the site will be constructed concurrently.

Consents / approvals required

Relevant local authorities: Ashburton District Council, Environment Canterbury

Resource consent(s) / designation required:

Land-use consent, Water permit, Discharge permit

Relevant zoning, overlays and other features:

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

Legal description(s)	Relevant plan	Zone	Overlays	Other features
Lot 1 DP 43334, CB21F/859	Ashburton District Plan	Rural B	N/A	Site contains a waterway
Lot 1 DP 43334, CB21F/859	Canterbury Land and Water Regional Plan	Ashburton sub-region	'At risk' (orange) Nutrient Allocation Zone. Hakatere/Ashburton River Groundwater Allocation Zone. Semi-confined or unconfined aquifers	Spring-fed Plains rivers identified.

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

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

Relevant plan / standard	Relevant rule / regulation	Reason for consent	Activity status	Location of proposed activity
Ashburton District Plan	10.7.2	Any activity, which does not comply with any one or more of the following Site Standards – does not comply with Site Standard 10.9.3 (distances of vehicle crossings from intersections).	Restricted Discretionary	Stranges Road frontage
Ashburton District Plan	14.7.4	Permitted utilities that are within the bed of any water body, 100m	Discretionary	Waterbody on-site

		of a lake or 20m of a stream.		
Ashburton District Plan	3.8.4	Earthworks that exceed the permitted volumes specified in Site Standard 3.9.13.	Restricted discretionary	Across the site
Ashburton District Plan	3.8.5	The proposal includes Community facilities in the Rural Zone.	Discretionary	Veterans facility/healthcare services/vet clinic
Ashburton District Plan	3.8.6	The proposal includes Commercial activities in the Rural Zone, dwellings that do not comply with Zone Standard 3.10.1 (residential density), and Visitor Accommodation, all of which are a non-complying activity under this rule.	Non-complying	High performance sports facility, equestrian centre, stables, café/restaurant
Ashburton District Plan	3.9.2	Site coverage exceeds 5% of net site area.	N/A	
Ashburton District Plan	3.9.3	Maximum building height exceeds 10m.	N/A	
Ashburton District Plan	3.9.13	Earthworks exceeding a volume of 5000m3 over an area of 2000m2 per annum.	Restricted discretionary (see Rule 3.8.4)	Across the site
Ashburton District Plan	3.9.14	Buildings to be located within 20m of a stream.	N/A	Adjoining the waterbody
Ashburton District Plan	3.10.1	Dwellings in excess of permitted density.	Non-complying	On-site townhouses
Ashburton District Plan	11.6.2	Vehicle movements may exceed the maximum Lmax level permitted, within the adjoining Rural B Zone to the south.	Restricted discretionary	Southern site boundary
Ashburton District Plan	11.8.1	Vehicle movements that may exceed the maximum Lmax level permitted, within the adjoining Rural B Zone to the south.	Restricted discretionary (see Rule 11.6.2)	Southern site boundary
Ashburton District Plan	13.7.2	Signage that is not non complying but will not comply with site standards or a general standard.	Restricted discretionary	Across the site
Ashburton District Plan	13.7.3	Signage that does not relate only to the	Non-complying	Across the site

		identification of the property.		
Ashburton District Plan	13.8	Signage in excess of permitted height.	Restricted discretionary (see Rule 13.7.2)	Signage on sprung buildings
Ashburton District Plan	13.9.2	Signage in connection with a community facility that will be visible from a public road or adjoining properties and will exceed 1m2 in area. Signage in connection with a community facility in the rural area, that will exceed 3m2 in area (visible from public road and adjoining property), and will be closer than 100m from another sign on the site.	Restricted discretionary (see Rule 13.7.2)	Across the site
Ashburton District Plan	13.9.8.1	More than one sign will be located on site in a Rural Zone.	Restricted discretionary (see Rule 13.7.2)	Across the site
Ashburton District Plan	13.9.8.2	Signs will exceed 2m2 in area in the Rural Zone.	Restricted discretionary (see Rule 13.7.2)	Across the site
Ashburton District Plan	13.9.8.3	In the Rural Zone, signage on the side of buildings will be more than 3m above ground level. Signage on site may be closer than 80m from another sign, as read from one direction.	Restricted discretionary (see Rule 13.7.2)	Across the site
Canterbury Land and Water Regional Plan	5.9	Discharge of wastewater on-site from a new treatment system, where the discharge will exceed 2m3 a day.	Restricted discretionary	BioGill system
Canterbury Land and Water Regional Plan	5.94B	Discharge of construction-phase stormwater where the area of disturbed land exceeds two hectares and the site is potentially contaminated.	Restricted discretionary	Across the site
Canterbury Land and Water Regional Plan	5.97	Discharge of stormwater not from a reticulated system.	Discretionary	Across the site (buildings and roads)

Canterbury Land and Water Regional Plan	5.120	Site dewatering during construction	Restricted discretionary	Across the site (buildings)
Canterbury Land and Water Regional Plan	5.141A	Installation, alteration or removal of a structure on, in or under the bed of a river (bridges and culverts) where it occurs in flowing water.	Discretionary	Waterbody
Canterbury Land and Water Regional Plan	5.169	Vegetation clearance and earthworks within 5m of the bed of the stream, and associated discharge of sediment, anticipated exceed 10% of the area of the riparian margin at one time, during enhancement works.	Restricted discretionary	Adjacent waterbody
Canterbury Land and Water Regional Plan	5.176	Earthworks over the unconfined or semi confined aquifer are anticipated to exceed a volume of 100m ³ , with excavation occurring within 50m of a surface water body.	Restricted discretionary	Across the site
Canterbury Land and Water Regional Plan	5.6	(a) for naturalisation of drains (b) for temporary or permanent diversion of the waterways.	Discretionary	Across the site
Canterbury Land and Water Regional Plan	5.126	(a) For temporary diversion of flow in the stream during works.	Restricted Discretionary	Waterbody
Canterbury Land and Water Regional Plan	5.188	On the assumption that site contamination from previous HAIL activities will require passive discharge consent.	Restricted Discretionary	Contaminated parts of the site
NES-Freshwater	Clause 71	For culvert design that does not meet the requirements of Clause 70.	Discretionary	Waterbody
NES for Assessing and Managing Contaminants in Soil to Protect Human Health	Clause 10	For change of use and disturbance of land where a DSI exists, which confirms the soil contamination exceeds the applicable standard in regulation 7.	Restricted discretionary	Contaminated parts of the site

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

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

N/A

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

N/A

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

N/A

Construction readiness

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

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

SPSCL has scheduled works to commence within 3 months of consent being granted. Manufacturers are on standby to deliver the facilities on agreed timelines. For example:

- Sprung Structures will manufacture each proposed facility based on 5 weeks to manufacture, 5 weeks on sea for delivery and 12 weeks to erect enabling commencement of fit out.
- Hector Egger New Zealand manufacturing the 32 passive townhouses will manufacture 4 townhouses per week, deliver them to site and erect to 'lockup and weather proof' at of rate of 3 to 4 per week, enabling fitout and cladding to be completed by follow-up teams.

SPSCL anticipates the timing of the project to be as follows (please note this is based on the assumption that resource consent will be obtained early 2023):

- Step 1: Detailed design and Planning / Procurement / Pre-construction – 1st quarter of 2023
- Step 2: Earthworks and Construction – commencing 2nd Quarter 2023. Construction is anticipated to take around 18 months.
- Step 3: Occupancy is planned – 3rd Quarter 2024.
- Step 4: Project Closeout – Official Opening Event planned end of 3rd Quarter 2024.

Part IV: Consultation

Government ministries and departments

Detail all consultation undertaken with relevant government ministries and departments:

SPSCL has met with the MP for Ashburton Jo Luxton and she is fully apprised and supportive of the project and will promote the importance of the project to the region to government ministers. Minister Luxton has promoted the project to the Minister for Environment and other ministries.

SPSCL Directors intend meeting with the Ministers of Defence, Health, Education and Trade and Industry once meetings are confirmed.

SPSCL has met with the NZDF and have received written support from NZDF for the project.

SPSCL has also consulted Waka Kotahi regarding this proposal and has received initial feedback that the development will not result in significant safety effects on the State Highway. Waka Kotahi have expressed they are happy to work with SPSCL on any refinements made to the transport aspects of the proposal.

Local authorities

Detail all consultation undertaken with relevant local authorities:

SPSCL over a period of 3 years has met with and kept the Ashburton District Council (ADC) fully apprised and updated as to the project's progress and development plans. SPSCL has had regular meetings with the CEO Hamish Riach of ADC, the Mayor Neil Brown (previous Mayor Donnas Favel), Councillors, ADC's District Planning Manager Ian Hyde, and ADC's Group Manager Strategy and Compliance Jane Donaldson for advice on consent requirements and discussions on utilisation of new innovative solutions and technologies to meet SPSCL goal to be a carbon zero campus.

SPSCL has more recently also engaged with Environment Canterbury to brief them on the proposal, and to seek preliminary advice on consent requirements, including Andrew Parrish (Regional Planning Manager) and Aurora Grant (Consents Planning Manager).

Other persons/parties

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

Consultation with other persons or parties: SPSCL CEO and Project Director, Catherine Stuart, has convened meetings with local residents at Lake Hood to fully apprise the residents of campus plans detailing the benefits of the project to the area and providing assurances SPSCL will ensure minimal effects to residents. Regular local news articles have been published along with a Facebook page keeping locals updated as to progress.

Ms Stuart has also presented to a combined Ashburton Rotary Club meeting and several local businesses who will benefit from the campus in provision of goods and services.

Detail all consultation undertaken with the above persons or parties:

As above.

Part V: Iwi authorities and Treaty settlements

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

Iwi authorities and Treaty settlement entities

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

Iwi authority	Consultation undertaken
Te Rūnanga o Arowhenua	Waiting on appointment with Arowhenua Iwi to provide full overview of project. Contact has been made with their representing agency; Ally Crane General Manager, Aoraki Environmental Consultancy Limited.

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

Treaty settlement entity	Consultation undertaken
Te Rūnanga o Ngāi Tahu	In depth discussion on phone with Karl Jackson of Ngāi Tahu and project overview documentation emailed.

Treaty settlements

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

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

N/A

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

Customary marine title areas

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

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

N/A

Protected customary rights areas

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

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

N/A

Part VII: Adverse effects

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

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

The Assessment of Effects on the Environment that will accompany the applications for resource consent required for the proposal will be prepared in accordance with Schedule 6 of the Fast Track Consenting Act. A number of technical assessments have already been completed

The following presents a general description of the anticipated and known adverse effects of the proposal on people and the environment, in sufficient detail to inform the Minister's decision on this application for referral. The analysis has been prepared with input from the appropriate specialists.

Three waters infrastructure: There will be no significant three waters infrastructure upgrades required. There is sufficient capacity in the Council network to provide the required drinking water demands, though a new pipeline will be required. Sufficient storage will be provided on site to capture and store stormwater and treated wastewater.

Natural hazards: Any adverse effects associated with natural hazards can be adequately avoided or mitigated. At this stage there are no identified natural hazards for the site. The land is not susceptible to flooding risk.

Soil Contamination: Any adverse effects associated with contaminated land can be adequately managed or avoided.

Transport: The proposal is anticipated to provide for all parking including mobility parking, cycle parking and loading demand on-site. The accesses are appropriately located and can be designed and formed to accommodate the regular / typical traffic volumes for day-to-day use and local / regional type competitions. Larger national and international type events will be managed by way of an event management plan that considers any traffic management that may be required for the accesses and route between the site and SH1. The proposal can be supported from a transport perspective.

Landscape and visual effects and amenity values: The effects on the rural character of the Site would be moderate to high with a range of different elements leading to a change from a very open setting to a parkland amenity. However, large open spaces will be maintained within the Site where sports/equestrian fields and overflow parking areas are located. The proposed buildings will be clustered and the residential development will be contained in the part of the Site that is closest to the existing Lake Hood settlement. The proposed planting will assist with the visual integration of the large-scale buildings on the Site to ensure that a high level of amenity can be achieved. While there will be a change in character on the Site, in respect of amenity values more generally, adverse effects are expected to be moderate within the site itself, but mitigated such that they will be less than minor to negligible on the surrounding rural environment.

Odour effects: For the proposed BioGill system, it has been assessed that the potential for any odour effects beyond the site boundary are very likely to be negligible given the large separation distances to sensitive locations beyond the site boundary, the scale of the BioGill facility, its location within the site, and through the implementation of mitigation measures proposed.

Ecological effects: Based on a preliminary ecological report, there are no terrestrial vegetation values that preclude the project, though design and construction elements will need to be managed carefully. Specialist ecological surveys, including of the waterways and in-stream fauna, lizard and bird species, may be required to complete a detailed Ecological Impact Assessment, depending on the detailed design process. Any required surveys will confirm ecological values present, which will allow for the identification of the magnitude and level of effects of the proposed activity on these ecological values, and the provision of subsequent recommendations using the effects management hierarchy, i.e. measures to avoid, remedy and mitigate adverse effects. The site does, however, provide a range of opportunities for ecological enhancement.

Urban design and urban form: The proposal has been carefully designed in a way that is sympathetic to the site's surrounds, with the larger scale buildings focussed towards the centre of the site. The layout of the site has also been designed to ensure connections across the site allow people to move freely between the various aspects of the Campus.

Reverse sensitivity: The proposal is not expected to result in any reverse sensitivity effects as there are no intensive farming activities occurring in close proximity to the site currently.

Loss of agricultural production: 64.48ha of the 64.97ha site contains highly productive land, in accordance with the NPS HPL. Approximately 6.5% of the site is to be covered by buildings, with a smaller amount of coverage for vehicle and pedestrian tracks. The large majority of the site will therefore retain the potential for reversion to productive land, but will not be used for its productive potential except insofar as there will be one glasshouse for horticultural use.

Even if the entirety of the site's soils are considered to be removed from productive potential, they represent only approximately 0.026% of highly productive land in Ashburton District, or 0.007% of land within Canterbury Region. Further, identified nutrient and freshwater constraints do however limit the future potential of the site for economically viable productive use. The loss of agriculturally productive land as a result of the proposal is therefore considered insignificant, and appropriate.

Retail effects: Any retail activities occurring on site are small scale, convenience-oriented that will not undermine the viability, vibrancy, and amenity values of the existing centres (large or small) within Lake Hood or elsewhere within the Ashburton District. In fact, the project will increase viability, vibrancy, and amenity values of centres in the District.

Economic effects: Economic benefits will arise in the form of additional employment, income and expenditure generated by the proposal, and reduced unemployment and underemployment. The proposal could equate to \$110 million GDP by 2028 for the region, sustaining 960 jobs. National economic activity associated with the proposal will peak during construction at \$123 million GDP in 2024, sustaining 1,070 jobs. The economic costs of the project are considered negligible and acceptable.

Part VIII: National policy statements and national environmental standards

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

New Zealand Coastal Policy Statement: The New Zealand Coastal Policy Statement is not relevant to the site, given the large distance between the site and the coastal environment.

National Policy Statement for Renewable Electricity Generation: The project does not involve nor is it located in the proximity of a renewable electricity generation activity. Similarly, the project site is not located in close proximity to any main electricity transmission lines nor is there a substation within the site, meaning the NPS for Electricity Transmission 2008 is not relevant.

National Policy Statement for Freshwater Management: No practices or effects are anticipated that would be inconsistent with the NPS for Freshwater Management 2020.

National Environmental Standards for Freshwater: With the possible exception of Clause 70, no activities will occur that contravene the NES for Freshwater, noting that no natural wetlands have been identified on the site. No structures are proposed within the stream that would impede the passage of fish. For the bridges or culverts that will be established over the stream, information required by Clauses 62/63 of the NES will be provided to Environment Canterbury in accordance with those clauses. For the establishment of a culvert in the stream, it is assumed that not all conditions of clause 70 can be met and a consent will therefore be required under clause 71(a).

National Policy Statement for Urban Development: With regard to the term 'urban environment', the NPS-UD defines an 'urban environment' as being an area of land that is or is intended to be predominantly urban in character; and is or is intended to be part of a housing and labour market of at least 10,000 people. The Ashburton population is greater than 10,000 people currently, with a population of approximately 18,000 people (source: Ashburton District Council). The Lake Hood settlement is located in close proximity to Ashburton township, albeit approximately 4.5km from the township's urban boundary. The Lake Hood settlement is predominantly urban in character and for the purposes of this application is considered part of the Ashburton urban environment.

The proposal is generally consistent with the objective and policies of this NPS, insofar as it will not provide opportunities for typical housing or business development, but will provide for the social and economic well-being and health and safety of people and communities through a high quality health service/rehabilitation centre and recreational facility (Objective 1). The proposal will support competitive land and development markets for housing affordability (Objective 2), albeit at a low level with only two permanent residential units proposed, with the remainder of units to be utilised by visitors. The proposal will result in a change to the environment adjoining the Lake Hood settlement, consistent with Objective 4. The infrastructure proposal for the site has been developed in close consultation with the Ashburton District Council, and will be funded by the applicant (Objective 6). The proposal will support a reduction in greenhouse gas emissions in so far as it is being designed as carbon zero and proposes to incorporate a range of innovative technologies which move away from the use of fossil fuels, in regard climate change, the site is not considered to be notably susceptible to climate change effects, being located considerably distant from the coast and not subject to any current or anticipated significant flood hazard (Objective 8). With regard to Policy 1, the proposal would contribute to a well-functioning urban environment, in that it will provide for a commercial recreational opportunity (the equestrian centre), and a rehabilitation centre, of a scale that will be unique within New Zealand, but which will also provide benefits to the Ashburton community, including through access to the rehabilitation facility's sports fields free of charge on weekends. It will have good accessibility, with a shared pedestrian/cycle route already extending from Ashburton township to the Lake Hood settlement, and an expressed intention by the applicant to work with the District Council to extend this south to the main site access. There are no current public transport services for Ashburton although some on-demand and private travel companies do provide some services. The rehabilitation centre will provide for participants travel via mini-vans and a coach such that they are not expected to need private vehicles. Persons visiting the equestrian centre regularly are more likely to require private vehicles, particularly for the transport of horses.

With regard Policy 6, the proposal does not form part of the planned urban built form for Ashburton. The recreational and equestrian aspects of the proposal require a peri-urban location where large areas of open space are available and are of a scale that has not been anticipated by the Ashburton District Plan. The proposal will nevertheless enhance the amenity values of the community (locally, nationally and even at an international scale) with the health and recreational opportunities it will afford. The proposal is considered to be highly beneficial to the community and will be consistent with a well-functioning urban environment.

Overall, the proposal will provide for a development that is unique to New Zealand. As such it does not readily fit into either a housing or business category, nor is it anticipated by the Ashburton District Plan, as is commonly the case for atypical developments. The site is located immediately adjacent the existing Lake Hood settlement, which is considered to form part of the Ashburton township urban area (noting contiguous urban areas are not a prerequisite of urban areas under the NPS), and the proposal will support a compact and well-functioning urban environment, albeit the development itself will be peri-urban in character as a result of the large areas of open space that will need to be maintained within the development. A high standard of amenity will be maintained throughout the development, though it will result in a change in amenity values of the site to what is currently experienced. The proposal is therefore considered consistent with the NPS-UD.

National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health: A preliminary site investigation has been undertaken which confirms the possible presence of HAIL activities on site, including a potential sheep dip (HAIL A8), vegetable garden (HAIL A10) and historical buildings (HAIL I). On this basis, a resource consent is assumed to be required for the site. A detailed site investigation will be undertaken to confirm which clause of the NES consent is required under, but it is most likely that Clause 10 will be applicable.

National Policy Statement on Highly Productive Land: 64.48ha of the 64.97ha site contains highly productive land, in accordance with the NPS HPL. Highly productive land has not yet been mapped by Environment Canterbury under Clause 3.5 of the NPS HPL, so Clause 3.5(7) applies which defines highly productive land as being LUC 1, 2 or 3 under the New Zealand Land Resource Inventory (where that land is zoned general rural or rural production).

Approximately 6.5% of the site is to be covered by buildings, with a smaller amount of coverage for vehicle and pedestrian tracks. The large majority of the site will therefore retain the potential for reversion to productive land, but will not be used for its productive potential except insofar as there will be one glasshouse for horticultural use. The proposal is therefore partially consistent and partially inconsistent with the Objective in that the majority but not all of the site's highly productive land will be protected for future use in land-based primary production, but will be removed from productive use for now.

Overall, there is some tension with the NPS HPL as land-based primary production will not be prioritised on the site and approximately 6ha of land will permanently lose its productive potential. The remainder of the site will be lost from primary production for the foreseeable future, but could be returned to productive use in the future if required. In this respect, that land is protected to some extent to use for future generations. In any case, identified nutrient and freshwater constraints do however limit the future potential of the site making it not economically viable for productive use for at least 30 years.

See full application lodged through this portal for full reasoning on the NPS-HPL conclusions.

Part IX: Purpose of the Act

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

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

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

Economic benefits will arise in the form of additional employment, income and expenditure generated by the proposal, and reduced unemployment and underemployment. The proposal could equate to \$110 million GDP by 2028 for the region, sustaining 960

jobs. Further, a sizeable share of that regional benefit will accrue to the local Ashburton economy, possible adding 3.5% to the District economy. National economic activity associated with the proposal will peak during construction at \$123 million GDP in 2024, sustaining 1,070 jobs. By 2028, National economic activity associated with the proposal will equate to \$73 million GDP, sustaining 630 jobs. The economic benefits of the proposal significantly outweigh the potential economic costs (of which there are very few).

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

Social wellbeing is the very foundation of the campus, following significant research it was found that services personnel and high performance athletes suffered when their career came to an end. The majority of individuals struggle to assimilate back into 'normal' life, often faced with a range of issues including mental health, rehabilitation, financial, marriage breakup, and lack of job opportunities. SPSC aims to change this by better preparing an individual through resilience, positive mental health, nutrition, and sport training and most importantly access to sponsored education in entrepreneurial, academic or sciences. A holistic approach will be taken. SPSCCL anticipate that its programs will provide the foundation for a more rounded, stronger and a confident individual to move forward to support themselves, their families, enjoying a meaningful and positive future.

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

If this project is successful in this fast-tracking application, work is anticipated to commence on site within three months of the grant of consent. Construction would occur as soon as practicably possible, with completion anticipated for 2024.

If this project is unsuccessful in this fast-tracking application, the timing of the commencement is significantly less certain. The applicant understands that most Councils are under significant resourcing constraints which has an impact on the internal processing rates of consents. Progressing a resource consent through the normal RMA route would be time consuming (given the likelihood of public notification and possibility of appeals). It is anticipated a resource consent process could take up to 12 months.

The alternative procedural option to a resource consent is to pursue a private plan change. This is the typical RMA process available when existing zoning (and policy framework) no longer align with the needs of the community or the most appropriate use of the land in question. Undertaking a private plan change is likely to take around two years in process (and potential appeals), however from our experience, delays can be much longer.

Funding for this project is dependent on securing consent promptly. Any delay puts the funding, and ultimately the entire viability of the project, at risk.

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

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

Employment/job creation:

A significant amount of work will be made available, particularly with regard to the construction of the project. In addition, the proposal will bring expenditure, incomes and employment opportunities for local businesses and residents within the Selwyn District and beyond.

At any one time, the total employment on the Campus when operational is forecast to be over 100 jobs. This would include teaching staff, sports coaches, sports health practitioners (physiotherapist, nutritionist, psychologist), sport scientists, facility maintenance, catering staff, administration, translators, medical staff, and more.

It is anticipated that employment during on-site construction would be around 900-1,000 jobs per annum.

The proposal could equate to \$110 million GDP by 2028 for the region, sustaining 960 jobs. Further, a sizeable share of that regional benefit will accrue to the local Ashburton economy, possible adding 3.5% to the District economy.

National economic activity associated with the proposal will peak during construction at \$123 million GDP in 2024, sustaining 1,070 jobs. By 2028, National economic activity associated with the proposal will equate to \$73 million GDP, sustaining 630 jobs.

Housing supply:

While only two permanent residential units are proposed (with the rest of the residential units anticipated to be utilised by participants of the Campus for the varying lengths of their stay, excepting that the Ashburton District Plan defines any stay over 4 months as residential activity), the proposed town houses and motel-style accommodation have been designed in a way that would enable them to be incorporated as part of the housing stock of the wider Lake Hood/Ashburton area should the proposal no longer require them.

Contributing to well-functioning urban environments:

In addition to the reasons set out in the response to Part 8, the project will contribute to well-functioning urban environments by (among other things): Providing for on-site accommodation for participants in the rehabilitation programme to minimise unnecessary travel to and from the site; transporting rehabilitation programme participants by bus/mini bus as far as practicable to minimise unnecessary travel; prioritising maintenance of high quality open space within the site, including enhancement of the existing waterway through riparian planting and walkway connections to Lake Hood and the Lake Hood settlement; use of advanced wastewater treatment facilities to minimise adverse effects from waste discharges; enabling access to the proposed facilities by the local community; capture and reuse of roof stormwater for reuse within the site.

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

As already noted, the project will provide economic benefits to Ashburton and the wider Canterbury region through, among other things, the creation of jobs and increase in employment. It will also provide for local infrastructure improvements through the introduction of the BioGill treatment system to the district.

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

The site is currently farmed and so environmental outcomes are already largely compromised. SPSCl is committed to ensuring that the waterways in particular on the site will be landscaped and maintained in a way that is intended to improve and enhance the quality of that waterway. The cessation of productive farming on site is expected to further reduce nutrient inputs onto the land where they may enter both surface and ground water.

Minimising waste:

Separate to the proposal, SPSCl is exploring a joint venture Bio-energy processing solution with the District Council that would utilise green waste, horse manure, food waste and local farmer dairy waste. SPSCl intends on fully funding and operating the bio-energy plant to cater to the Campus' bio-waste (food, cardboard, green waste and horse manure). The Bio-energy system produces enriched compost and methane gas that can then be reused for a range of purposes.

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

SPSCl is working closely with solution and technology providers in its aim to be a carbon zero campus. SPSCl intends to include the following components to the Campus as a result:

- Solar energy – the large Sprung facilities will be clad with a 'solar skin' technology that enables energy to be stored and used to supply those facilities with power. SPSCl anticipates that it will require minimal draw down from the grid and re-supply of solar generated power to the grid. SPSCl is engaging with EA Networks

to discuss a mutually beneficial and co-operative electricity supply and fibre optic internet services agreement.

- Bio waste – SPSCCL intends to process its sewage and grey water utilising innovative, scalable environmental bio-solutions. After significant research SPSCCL has the BioGill plug and play technology developed in Australia which has a number of proven sites. The BioGill system has a range of proven environmentally friendly benefits when compared to typical systems.
- All residential dwellings will be designed and constructed as passive housing, with a focus on high energy efficiency while creating a comfortable living space.

Promoting the protection of historic heritage:

N/A

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

Resilience to climate change will be achieved through: the site's distance from coastal and low lying areas susceptible to sea-level rise and storm surges; the land's resilience to heavy rainfall events/frequency; and the potential for building and landscape design to address increased mean temperatures or amplification of heat extremes. Social resilience will be strengthened through the provisions of health/rehabilitation services.

Other public benefit:

Most other public benefits have largely been quantified in consideration of the economic benefits. However, some further less tangible benefits would include the potential for New Zealand (and even Canterbury/Ashburton) to be recognised internationally as a location for holistic veteran/pro-athlete care and equestrian sports.

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

This project is not expected to result in any significant adverse environmental effects.

Part X: Climate change and natural hazards

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

The proposal will support a reduction in greenhouse gas emissions in so far as it is being designed as carbon zero and proposes to incorporate a range of innovative technologies which move away from the use of fossil fuels. In regard climate change, the site is not considered to be notably susceptible to climate change effects, being located considerably distant from the coast and not subject to any current or anticipated significant flood hazard.

Part XI: Track record

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

Local authority	Compliance/Enforcement Action and Outcome
No details	

Part XII: Declaration

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

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

Lucy Forrester

01/03/2023

Signature of person or entity making the request

Date

Important notes:

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

Checklist

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

Yes	Correspondence from the registered legal land owner(s)
Yes	Correspondence from persons or parties you consider are likely to be affected by the project
Yes	Written agreement from the relevant landowner where the project includes an activity that will occur on land returned under a Treaty settlement.

Yes	Written agreement from the holder of the relevant customary marine title order where the project includes an activity that will occur in a customary marine title area.
Yes	Written agreement from the holder of the relevant protected customary marine rights recognition order where the project includes an activity that will occur in a protected customary rights area.