

Your Comment on the Ōhoka Residential Subdivision

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
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Executive Summary

This submission strongly opposes the proposed Ōhoka Residential Subdivision (FTAA-2606-1253). Drawing on my professional expertise as a mathematician and my lived experience as a directly affected downstream resident, a critical review of the application reveals fundamental engineering flaws, severe data omissions, and a complete lack of regional economic justification.

This application fails the foundational premise of the Fast-track Approvals framework. It provides zero net regional economic benefit, merely displacing housing demand from strategically planned, infrastructure-ready growth nodes within the Waimakariri District. The proposal privatises the financial gains of the subdivision while socialising multi-million-dollar infrastructural, environmental, and insurability costs onto existing ratepayers and downstream neighbors.

The Expert Panel must decline this application based on the following fatal flaws:

Fundamentally Flawed Hydrological Modeling: The applicant's flood assessment relies on disjointed, uncoupled models (HEC-HMS and TUFLOW) that mathematically contradict each other. Attenuation volumes have been calculated under theoretical "free-outfall" conditions, despite the applicant's own data (Table 11) acknowledging severe tailwater overlap. This mathematically compromises the system's attenuation capacity, guaranteeing unmitigated flooding for immediate downstream properties.

Unmitigated Toxic Discharges and Ecological Destruction: The proposal removes 3.8 hectares of natural wetlands and actively relies on a "reasonable mixing" loophole to discharge stormwater that fails to meet 95% species protection limits for heavy metals (zinc and copper). This poses an unacceptable ecological hazard and directly contradicts the National Policy Statement for Freshwater Management (NPS-FM) and Te Mana o te Wai.

Fatal Omissions in Traffic and Infrastructure Assessments: The applicant's Integrated Transport Assessment (ITA) completely omits capacity and safety modeling for the Mill Road / Jacksons Road intersection—the primary access point for Ōhoka School. This omission introduces a fatal variable bias, masking the true hazard posed to local students by the massive influx of commuter and construction traffic. Furthermore, the developer fails to front-fund the required roading and active-transport upgrades required to safely accommodate their induced demand.

Destruction of Downstream Insurability: By artificially elevating low-lying land and relying on high-risk, in-ground lined basins in a high-groundwater environment, the development significantly increases the surface-water flooding risk for downstream properties. This unmitigated risk directly threatens the ability of existing residents to maintain affordable insurance coverage, representing a massive, unaccounted economic externality.

Because the localised, unmitigated adverse effects vastly outweigh any illusory, zero-sum economic gains, this application must be declined.

Should the Expert Panel choose to approve the consent, this submission explicitly details the mandatory, legally binding conditions (Section 2 through 5) including individual above-ground attenuation tanks, 100% front-funded transport infrastructure, strict heavy metal filtration, and school-hour construction curfews, that must be imposed to mitigate severe harm to the existing environment and community.

1. Introduction

1.1 My family has resided in Ōhoka for over a decade. We specifically chose this location for its high rural amenity—namely the low population density, tranquil environment, dark night skies, and abundant local native birdlife (e.g., pūkeko, pīwakawaka, korimako, kāhu, tauhou). Our property is situated on the eastern side of Whites Road, positioning us directly downstream in the immediate receiving environment of the proposed development.

1.2 This proposal represents the most drastic urbanisation in Ōhoka's 150-year history. If approved, a dense subdivision of this scale will irreversibly destroy the area's established rural character and permanently degrade the environmental qualities that define this community.

1.3 The introduction of urban-level traffic noise, dense impervious surfaces, and light pollution will fundamentally degrade the current receiving environment.

1.4 Professionally, I am a trained mathematician with extensive expertise in reviewing and validating applied mathematical models of physical systems. This technical background directly informs my severe concerns regarding the fundamental flaws, inconsistencies, and unrealistic assumptions present in the applicant's hydrological and flood modelling.

2. Flooding

2.1 Complementing my technical background is a decade of lived experience directly downstream of the site. I possess firsthand, observational knowledge of the exact overland flow paths and inundation levels that occur on my property during significant rain events.

2.2 The subject site consists of low-lying, swampy farmland with limited natural infiltration capacity. The proposal seeks to artificially raise ground levels and introduce massive areas of impermeable surfacing. As the applicant concedes, this will fundamentally alter the catchment's hydrology and dramatically increase the volume and velocity of surface runoff directed at downstream receiving properties.

2.3 Subsurface stormwater basins and soak pits are inherently unviable in this location. The local groundwater table sits at or just below the surface, a fact confirmed by the applicant's own groundwater monitoring. In winter, any excavated hole on my property instantly fills with groundwater. Existing soak pits fail under these saturated conditions, forcing runoff to travel overland into local streams which quickly exceed capacity and back up onto adjacent land.

2.4 To mitigate this high water table, the applicant proposes excavating stormwater management areas and installing artificial liners. This approach ignores severe hydrostatic pressure. I have previously experienced groundwater physically pushing up and displacing an emptied lined pond on my property, and I must actively manage my concrete septic tank to prevent it from floating out of the ground. The applicant's lined basins would require highly complex, unproven dewatering systems to remain stable. Furthermore, liners inevitably degrade and puncture, creating a massive long-term maintenance liability for the Council. If this highly engineered, high-risk system fails, the attenuation capacity is lost, and downstream flooding is guaranteed.

2.5 The only proven, reliable stormwater mitigation strategy for this area's specific geological constraints is above-ground attenuation. This is successfully demonstrated by recent housing developments on Mill Road, which utilise large, entirely above-ground rainwater tanks. If this development proceeds, mandatory above-ground attenuation tanks must be required for every individual dwelling, rather than relying on high-risk, in-ground communal lined basins.

2.6 The applicant explicitly concedes that their flood modelling uses coarse data and is only valid at a broad catchment level, not at an individual property scale. Therefore, their definitive claim that there are "no adverse flooding effects" on downstream dwellings is entirely unsubstantiated. My ground-truthed experience exposes this flaw: the applicant's modelled baseline for a 50-year ARI event completely misrepresents the actual overland flow path on my property (Figure 1). The model predicts flow in the green area, whereas reality dictates flow along the red path, often exceeding 200 mm in depth during storms we have experienced several times in the last decade.

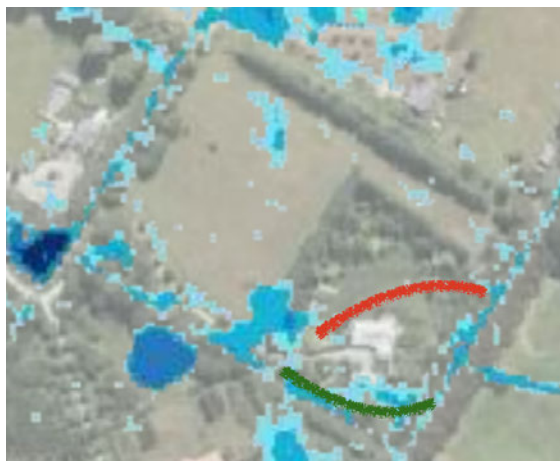


Figure 1: For the 50-year ARI, the green path represents the applicant's modelled pre-development flow. The red path indicates the actual overland flow observed in reality, which reaches over 200 mm deep in multiple places.

2.7 Tellingly, the applicant's model only begins to resemble the flooding we routinely experience when it runs a 200-year ARI scenario (Figure 2). Even then, it underestimates the true depth and spread of the water, which frequently washes over paths and against the northern foundations of my house. Because we have not experienced a true 200-year ARI rainfall event in the last decade, the fact that their 200-year model is required to replicate our modern 50-year reality proves the model is fundamentally inaccurate. If the baseline model cannot accurately replicate current, real-world flooding on immediate downstream properties, its post-development predictions are entirely unreliable and cannot be used to rule out severe adverse effects.

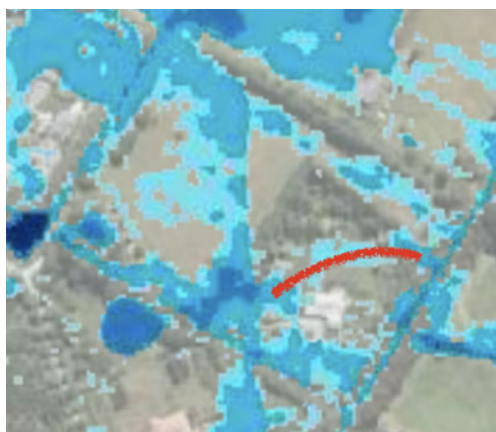


Figure 2: For the 200-year ARI, the indicated flow starts to match what happens in 50-year ARI events.

2.8 The applicant's modelling methodology is fundamentally flawed from a mathematical and engineering perspective. The assessment relies on two distinct and explicitly uncoupled models: HEC-HMS is utilised to calculate runoff volumes and size the Stormwater Management Areas (SMAs), while a separate TUFLOW model is deployed to assess overland flood routing. The applicant explicitly concedes that the SMAs have not been represented in the TUFLOW model. Conversely, the HEC-HMS model assumes a theoretical "free-outfall" condition, entirely failing to account for real-world backwater (tailwater) effects.

2.9 This disjointed methodology constitutes a critical engineering failure. The eastern boundary of the site, particularly along Whites Road, is subject to significant floodwater backing up during high-rainfall events. The applicant's own TUFLOW model confirms that peak receiving-water levels will directly coincide with the peak discharge times of the eastern SMAs. Specifically, Table 11 of the applicant's Stormwater Management Report proves that Wetland 9C-1, SMA 9A, SMA 9B, SMA 10, and SMA 3 all experience severe tailwater overlap. For example, the HEC-HMS model dictates that SMA 9A reaches its discharge peak at 05:56. However, this occurs directly in the middle of a nearly 13-hour window (04:00 to 16:45) where the TUFLOW model proves the receiving flood level is higher than the SMA's Permanent Water Level (PWL).

2.10 When the receiving waterway (tailwater) is higher than the discharge point of the attenuation basin, the basin cannot drain. By calculating SMA attenuation volumes under theoretical "free-outfall conditions" while simultaneously acknowledging that the outfalls will be submerged by floodwaters, the applicant's model fundamentally underestimates the required attenuation volumes. Consequently, the assertion that post-development peak flows will be safely attenuated to pre-development levels is mathematically compromised. In reality, these basins will rapidly fill, overtop their spillways, and discharge unattenuated urban runoff directly onto downstream properties like mine. Utilising uncoupled modelling for a site with explicitly acknowledged tailwater/backwater issues is a severe deviation from best-practice hydrological engineering.

2.11 Because the models have been developed in isolation and rely on impossible hydraulic conditions, the applicant's conclusion that the development will safely manage stormwater is entirely unsubstantiated. The applicant has failed to meet the evidentiary burden required to prove that my property, and the wider downstream receiving environment, will not be subjected to severe, unmitigated flood hazards.

2.12 My concerns regarding the exacerbation of flooding are not merely anecdotal; the regional council warned of higher groundwater-flooding risk for downhill neighbouring properties. Despite this explicitly acknowledged risk to properties like mine, the draft conditions meant to control this risk still point to an outdated, weaker pipe standard. It is unacceptable that the developer is proposing to use substandard infrastructure to mitigate a severe flooding risk that will directly impact downhill neighbours.

2.13 The proposal's approach to natural water management will severely compound existing drainage issues. Updated drawings show that about 88% of the site's wetlands (approximately 3.8 hectares) will be removed. This destruction is far more than the figure used elsewhere in the application. Destroying such a massive portion of the area's natural wetlands removes vital environmental features that absorb and attenuate water. This runs directly counter to national directives aiming to protect and restore inland wetlands, permanently removing natural attenuation infrastructure. This will undoubtedly worsen the volume and velocity of surface runoff directed at downstream properties, directly contradicting any claims of 'less than minor' hydrological effects.

2.14 Unmitigated Toxic Stormwater Discharges: Beyond raw flood volume, the applicant's proposed stormwater system fails to legally treat urban contaminants. The applicant's own Water Quality Assessment explicitly admits that the stormwater discharge "is not expected to directly meet the 95% species protection limits for total zinc and total copper at all points of discharge." The applicant relies on a "reasonable mixing" loophole, conceding there will be periods of up to 4 hours during a storm where toxic levels of zinc and copper will flow into the Ōhoka Stream Tributary before adequate dilution occurs. Discharging illegal levels of toxic heavy metals directly onto downstream receiving properties and waterways is an unacceptable ecological and health hazard. Furthermore, the discharge of zinc and copper directly contradicts the fundamental concept of *Te Mana o te Wai* and degrades downstream *mahinga kai* and local Ngāi Tahu values.

2.15 As a downstream receiving property on Whites Road, I am deeply concerned by the inadequacy of the proposed wastewater infrastructure. The existing wastewater pump station is overwhelmed three to four times per decade in the exact wet conditions expected by this project. Furthermore, the backup storage system relies on a delayed Council upgrade. If the system overflows, it would likely spill into a nearby waterway. This poses a direct and unacceptable threat of raw wastewater and sewage contamination flowing onto my property during the heavy rainfall and flooding events that this area already regularly experiences.

Condition 2.A: Requirement for appropriate and proven storm-water management that does not rely on groundwater-dependent infiltration

- **2.A.1 The Risk:** Adding over 850 households to a network with untested and incompatible storm water management for the local area will have severe adverse impacts for existing houses. The applicant's current modelling is poorly calibrated and has fundamental technical flaws resulting in meaningless output and conclusions.
- **2.A.2 The Rule:** Every house must have appropriate and proven above-ground stormwater attenuation tanks.
- **2.A.3 The Trigger:** The consent for every house built must include a mandatory requirement for the installation of above-ground stormwater attenuation tanks prior to the issuance of a Code of Compliance Certificate.

Condition 2.B: Mandatory Pre-Discharge Treatment of Heavy Metals

- **2.B.1 The Risk:** The applicant's proposed stormwater system legally fails to treat heavy metal contaminants. By the applicant's own admission, runoff will exceed the 95% species protection limits for zinc and copper. Relying on an off-site "reasonable mixing" zone allows toxic urban runoff to flush directly onto downstream properties and into the Ōhoka Stream Tributary for up to 4 hours per storm, creating an unacceptable ecological and health hazard.
- **2.B.2 The Rule:** The developer must install advanced, high-capacity stormwater filtration devices capable of treating all stormwater runoff to strictly meet or exceed the 95% species protection limits for total zinc and copper *prior* to the point of discharge off-site. The developer is expressly prohibited from relying on downstream "reasonable mixing" zones on adjacent properties to dilute their toxic runoff.
- **2.B.3 The Trigger:** Final engineering designs proving 100% compliance with heavy metal discharge limits at the boundary outfall must be peer-reviewed and certified by an independent water quality engineer prior to the commencement of any earthworks.

3. Rural Character & Amenity

3.1 The proposed development constitutes a severe and unmitigated loss of established rural visual amenity currently enjoyed from my property. Replacing an unobstructed pastoral landscape with a dense urban subdivision constitutes a severe and immediate loss of visual amenity. While the applicant relies on boundary planting to mitigate this adverse effect, this approach is fundamentally inadequate. Screen

planting takes decades to reach a mature height, meaning existing residents will be forced to endure the stark visual impact of an urbanised subdivision for a generation before any promised mitigation takes effect.

3.2 The applicant has completely omitted any ecological assessment regarding the introduction of a dense domestic cat population into this rural environment. A subdivision of over 850 households will inevitably introduce hundreds of predatory domestic cats into an area currently characterised by open space, wetlands, and established bird habitats. Because this significant threat has been entirely ignored in the environmental assessments, the applicant cannot credibly claim that the development will avoid severe adverse effects on local native and endemic birdlife. Cat-free covenants are already a proven, legally viable mechanism successfully implemented in other sensitive subdivisions in Canterbury to protect local ecology.

Condition 3.A: Immediate Visual Mitigation and Ecological Protection

- **3.A.1 The Risk:** Severe loss of rural visual amenity for existing residents and the unmitigated ecological destruction of native birdlife by hundreds of introduced domestic cats.
- **3.A.2 The Rule:** The developer must install immediate, established visual and acoustic mitigation (such as mature specimen trees and physical bunding/fencing) along the boundary, rather than relying on seedlings. Furthermore, a strict ecological covenant must be placed on all new titles prohibiting the ownership of roaming domestic cats to protect local avian wildlife.
- **3.A.3 The Trigger:** Visual mitigation must be physically completed prior to the issuance of the first residential code of compliance. The cat-free covenant must be legally registered on the base subdivision title.

4. Infrastructure

4.1 Public Transport & Car Dependency: The existing public transport infrastructure in Ōhoka is practically non-existent and entirely incapable of supporting a high-density urban development. Introducing over 850 new households into a rural area with no viable public transit options guarantees absolute car dependency. This will force thousands of daily private vehicle movements onto the local road network, directly contradicting sustainable urban growth policies and generating massive, unmitigated congestion.

4.2 Roothing Network & Unfunded Liabilities: The proposed development will inject an unprecedented volume of private commuter traffic onto narrow, rural roads that were never designed for urban capacity. Despite inducing this massive traffic demand, the applicant has failed to provide binding commitments or financial allowances to upgrade the surrounding road network. By refusing to front-fund these critical infrastructure improvements, the developer is effectively privatising the profits of the subdivision while socialising the costs. This represents a massive, unmitigated negative externality that will leave the Waimakariri District Council—and local ratepayers—bearing the multi-million-dollar burden of upgrading and maintaining a degraded road network.

Condition 4.A: Front-Funded Roothing and Infrastructure Upgrades

- **4.A.1 The Risk:** The developer induces massive traffic demand but fails to fund the required upgrades to Ōhoka's rural roosting network, shifting a multi-million-dollar burden onto existing ratepayers.

- **4.A.2 The Rule:** The developer must be subject to a comprehensive Development Contribution levy, legally binding them to fully fund 100% of the intersection, public transport, and carriageway upgrades required to safely accommodate their induced traffic demand.
- **4.A.3 The Trigger:** All required traffic upgrades must be fully funded and physically constructed prior to the commencement of Stage 1 residential occupation.

4.3 Water supply: The developer's own hydrological modelling reveals severe contradictions that indicate direct harm to adjacent properties. The raw modelling for the development's permanent water supply shows neighbouring bores being pushed past safe drawdown limits. Furthermore, during the construction phase, dewatering wells are predicted to cause drops of 2.91 m and 3.17 m at neighbouring boundaries. This directly contradicts the developer's own claim that a 3 m drawdown is unlikely to cross the boundary. These inconsistencies prove that the modelling is unreliable and that the water security of existing residents is being heavily compromised.

Condition 4.B: Protection of Existing Bores and Water Security

- **4.B.1 The Risk:** Construction dewatering and permanent supply draws will exceed safe drawdown limits, threatening the water security of existing residents.
- **4.B.2 The Rule:** The developer must install continuous telemetric monitoring on boundary bores. If drawdown exceeds 1.0m (or a locally safe threshold) at the boundary, pumping must legally halt.
- **4.B.3 The Trigger:** Monitoring equipment installed and baseline levels established prior to any earthworks or dewatering commencing.

4.4 School Health and Safety and Infrastructure The Ōhoka School Board's Infrastructure and Traffic Impact Assessment (attached at end) demonstrates that the proposed fast-track development poses numerous health and safety issues for local students and infrastructure. Ōhoka School is currently operating beyond its maximum sustainable physical capacity of 223 students, a situation that recently caused the Ministry of Education to reduce the school's enrolment zone due to unmanageable roll growth. Despite proposing a large development of 879 residential allotments and up to 250 retirement units, the Applicant provides no binding guarantee for a new school; they admit their plans rely entirely on the Ministry of Education purchasing the retirement village site post-consent. Furthermore, the Applicant's Integrated Transport Assessment fatally omits any capacity or safety modelling for the Mill Road and Jacksons Road intersection, which serves as the primary access point for the school. A recent survey of the school community reveals that local infrastructure is already failing, with 82% of respondents noting severe parking shortages, and 62% holding explicit health and safety concerns regarding active student transport on our heavily constrained and hostile rural roads.

Condition 4.C: School-Hour Construction Traffic Curfews

- **4.C.1 The Risk:** Continuous heavy vehicle movements on narrow rural roads pose an imminent threat to students.
- **4.C.2 The Rule:** A total prohibition on all heavy construction vehicles, fill-hauling trucks, and contractor parking on Jacksons Road, Mill Road, and Whites Road between the hours of **8:00 AM–9:00 AM** and **2:30 PM–3:30 PM** on all gazetted school days.
- **4.C.3 The Trigger:** Must be written into the mandatory Construction Traffic Management Plan (CTMP) prior to any earthworks commencing.

Condition 4.D: Front-Funded Active Transport Infrastructure

- **4.D.1 The Risk:** Adding 879 households and up to 250 retirement units to a network with limited dedicated cycle or pedestrian infrastructure forces children to share the carriageway with commuter and construction traffic. The Applicant admits the Mill Road shared path extension is currently unfunded.
- **4.D.2 The Rule:** The Applicant must fully fund and construct physically separated cycleways and pedestrian footpaths connecting the subdivision directly to Ōhoka School and all local roads that will experience increased traffic.
- **4.D.3 The Trigger:** These active transport routes must be completed and certified for use *prior* to the issue of the first residential code of compliance (Section 224c) for Stage 1.

Condition 4.E : Safe Drop-Off and Parking Mitigation

- **4.E.1 The Risk:** The school's current parking is already operating at failure capacity. The development's added traffic—and the lack of safety assessment for the Mill Road / Jacksons Road intersection—will result in unsafe, chaotic verge-parking and reversing hazards.
- **4.E.2 The Rule:** The Applicant must provide funded mitigation for school frontage upgrades, including the construction of a dedicated, off-carriageway "drop-off/pick-up zone" to alleviate the congestion caused by their induced traffic demand.
- **4.E.3 The Trigger:** To be designed in consultation with the Waimakariri District Council and the School Board, and completed prior to the occupation of Stage 1 housing.

Condition 4.F: Mandatory Traffic Assessment and Upgrade of Mill Road / Jacksons Road intersection

- **4.F.1 The Risk:** We could not locate any capacity or safety modelling for the Mill Road / Jacksons Road intersection in the Applicant's ITA, despite it being the primary access point for Ōhoka School. By excluding this, the Applicant's models fail to capture the true peak variance caused by school commuting. Without this empirical data, the intersection poses an unquantified safety risk to students and commuters due to the massive influx of development traffic.
- **4.F.2 The Rule:** The Applicant must commission an independent, full traffic and safety assessment of the Mill Road / Jacksons Road intersection that explicitly models peak school-run traffic. The Applicant must fully fund any required safety and capacity upgrades identified by this assessment.
- **4.F.3 The Trigger:** The traffic assessment must be completed, peer-reviewed, and approved by the Waimakariri District Council prior to any earthworks commencing. All required physical upgrades to the intersection must be completed and operational prior to the occupation of Stage 1 housing.

Condition 4.G: Staged Alignment with Ministry of Education Capacity and Land Provision

- **4.G.1 The Risk:** The rapid influx of families will force unfunded emergency capital expenditure (e.g., temporary classrooms) and consume existing green space. A large proportion of the school's field space is land privately owned by a local resident and generously made available for the school to use; this land is not available for expansion. Furthermore, the Applicant explicitly admits their "plan" for a new school relies entirely on the MoE buying the retirement village site.
- **4.G.2 The Rule:** The Applicant must set aside and formally offer the designated "school/retirement village" land to the Ministry of Education for acquisition.
- **4.G.3 The Trigger:** Any later stages of the development must be explicitly tied to the MoE's published roll and capacity figures, ensuring progression only occurs when adequate educational capacity is confirmed at Ōhoka School or the new site.

5. Insurability Risk

5.1 Over the 10-year period we have been here the cost of insurance has more than doubled. Insurers increasingly utilise independent, highly granular surface-water flood modelling to price risk, moving away from generalised Council hazard maps. Any localised increase in surface ponding, runoff, or depth directly threatens the ability of downstream properties to maintain affordable insurance coverage. If insurance coverage becomes unavailable or cost-prohibitive, property values plummet, and equity is destroyed. This loss of insurability represents a direct, unmitigated economic cost imposed on adjacent landowners. Tellingly, this massive negative externality is entirely excluded from the applicant's Economic Benefits Assessment (Appendix 2).

Condition 5.A: Comprehensive Flood Risk Liability

- **5.A.1 The Risk:** The developer's unproven stormwater system fails, or the artificial elevation of their land directs surface water to neighbouring properties, causing liability issues for downstream properties.
- **5.A.2 The Rule:** The developer must provide mandatory financial bonds for infrastructure failure for immediate downstream properties resulting from the failure or overflow of the subdivision's stormwater network.
- **5.A.3 The Trigger:** Legal mechanism established prior to the issuance of the first residential code of compliance.

6. Absence of Net Economic Benefits

6.1 The applicant's assertion that this development will deliver significant economic benefits is fundamentally flawed. The Waimakariri District already possesses more than sufficient zoned development capacity to meet projected housing demand. Consequently, this proposal does not generate new, organic economic growth; rather, it creates a purely redistributive effect. It will merely displace housing demand and construction activity away from strategically planned, infrastructure-supported growth nodes within the district. By cannibalising planned development from areas where the Council has already invested in infrastructure, this project offers absolutely no net economic benefit to the region, while simultaneously imposing massive, unfunded infrastructural liabilities onto existing ratepayers. Waimakariri District Council has already thoroughly assessed and rejected this specific site for urban zoning during its District Plan review. Overriding this democratically established spatial plan cannibalizes infrastructure-supported growth nodes for zero net regional benefit.

6.2 When the true economic externalities are accounted for - including the loss of downstream insurability, the degradation of rural amenity, and the multi-million-dollar burden of upgrading the local roading and school networks - the net economic impact of this development is severely negative. The applicant's economic assessment privatises the financial gains of the subdivision while socialising the massive infrastructural and environmental costs onto the community.

6.3 Far from providing a net economic benefit, this proposal actively threatens existing local infrastructure and businesses. The development will seriously hurt the existing Mandeville shopping centre. Specifically, the Mandeville centre faces a 21-29% reduction in food and grocery jobs. The justification for this economic shift is incredibly weak, as the surveys claiming "high demand" for housing at the site are two years out of date, mostly surveyed city residents, and the author admits bias and time limits. The application cannibalises established local commercial hubs while relying on severely flawed, biased, and outdated data to justify its existence.

6.4 The applicant relies heavily on the fast-track pathway as a shield, operating under the implicit assumption that inclusion in this process provides an unquestionable mandate of economic benefit. This assumption must be critically scrutinised. The Fast-track process was designed to expedite projects of genuine regional or national significance, not to bypass fundamental engineering and economic realities. When the localised, unmitigated costs of this specific development are accurately tallied—including the destruction of downstream insurability, the unfunded liability of rural road upgrades, the forced capital expenditure on a historic school, and the displacement of planned housing demand—the assumed economic benefits completely evaporate. Inclusion in a fast-track process does not absolve the applicant of the laws of physics, hydrology, or basic civic economics. Because the adverse effects vastly outweigh any illusory, zero-sum economic gains, the Expert Panel must decline this application.

Appendix A



Ōhoka School
261 Jacksons Road
Ōhoka

Ōhoka School Infrastructure and Traffic Impact Assessment

Community Impact Assessment and Board Statement Regarding FTAA-2606-1253
Prepared by the Ōhoka School Board (Data Analysis by Dr. Daniel Myall, Biostatistician) – 7th October 2026

Material Reviewed:

3. Novo Group Integrated Transport Assessment (ITA) (May 2026)
4. Waimakariri District Council (WDC) Letter to EPA (9 July 2026, EPA Completeness Memo Appendix 2)
5. Ōhoka School Community Impact Survey (September 2026)

1. Executive Summary and Baseline Infrastructure Failure

1.1 Established over 150 years ago, Ōhoka School has served as the heart of our rural community for generations. The proposed fast-track development (FTAA-2606-1253) represents the single largest demographic and infrastructural change in the school's 150-year history.

1.2 The Ōhoka School Board strongly asserts that the transport and infrastructure assessments provided by the Applicant are fundamentally incomplete. The Applicant's Integrated Transport Assessment (ITA) explicitly acknowledges that Mill Road provides the primary access to Ōhoka School via Jacksons Road. However, upon reviewing the ITA (specifically Section 2 'Intersections' and Section 5 'Wider Effects'), we could not find any capacity or safety assessment of the Mill Road / Jacksons Road intersection. This omission introduces a fatal omitted-variable bias into their broader network capacity models by failing to account for the primary source of localised peak-hour variance.

1.3 By failing to model the daily peak-hour traffic movements associated with the Ōhoka School run, the application masks the true operational limits and safety hazards of the immediate school network. To provide the Expert Panel with accurate, on-the-ground operational data, the Board conducted a targeted Community & School Impact Survey. *(Note on Methodology: The cross-sectional survey was administered from 25/09/2026 to 02/10/2026 to the population of school households (N=153). We achieved a sample size of n=39 (a 26% response rate). Given this is a voluntary response sample, we acknowledge the inherent self-selection bias: respondents logically represent the most highly engaged and concerned stakeholders within the school community. Rather than inferring these point estimates represent the entire population, these figures empirically quantify the severe infrastructural friction already experienced daily by a quarter*

of our active school community.) The baseline empirical data from our respondents indicates that the local road network and school parking infrastructure are already heavily constrained and failing to safely accommodate active student transport.

1.4 Furthermore, the school is already operating at its maximum sustainable capacity. The Ministry of Education recently intervened to reduce the school's enrolment zone (refer to MoE advice dated 17/11/2025) specifically because current roll growth had become unmanageable against the school's estimated physical capacity of 223 students (with 224 students currently enrolled). Introducing 879 allotments plus up to 250 retirement units without front-funded, mandatory infrastructure upgrades will trigger an immediate health and safety crisis for our students, overwhelm the site's physical capacity, and substantially alter the school's historical character.

2. Current Traffic and Parking Exhaustion

2.1 The Applicant proposes a massive increase in local traffic volume without acknowledging the existing severe congestion during school drop-off and pick-up times, nor do their traffic distribution assumptions account for localised school commutes.

- **2.2 Severe Parking Failure:** 32 of 39 surveyed respondents (**82%**) confirmed there is not enough parking at Ōhoka School.
- **2.3 Network Congestion:** 13 of 39 respondents (**33%**) rate current traffic flow as either "very busy and hard to navigate" or experiencing "unsafe/severe congestion."
- **2.4 Community Experience:** Qualitative feedback from parents indicates the parking infrastructure is already failing. Respondents noted they must arrive as early as 2:30 PM to secure a park, frequently having to park on grass verges or far down the road. One parent summarised the situation: *"I genuinely feel that the parking is already at capacity... If the school grows substantially with this new development, parking will definitely be a huge issue."*

3. Active Transport and Student Safety Risks

3.1 The Fast-track Approvals Act requires the mitigation of adverse effects, yet the Applicant's proposal introduces heavy construction vehicles onto rural roads that are already deemed unsafe for pedestrians and cyclists.

- **3.2 Documented Safety Threat:** 24 of 39 families (**62%**) hold explicit health and safety concerns regarding their children traveling to and from school.
- **3.3 Hostile Active Transport Environment:** Parents report that many local roads have no safe space for kids to ride bikes or walk, and that speeding vehicles pose an immediate, daily threat.
- **3.4 Community Experience:** Parents highlighted the immediate danger to children attempting to use active transport: *"Its busy at the moment, I live down a local road and barely can walk to school because people... don't slow down from 100km p/hour while passing a walker/biker."* Another parent noted: *"I'd prefer to send my kids by bike but without a clear cycle lane I don't feel it's safe enough to do so."*
- **3.5 Unfunded Mitigation:** The Applicant's ITA concedes that shared path upgrades on Mill Road from Whites Road to Ōhoka School are "Planned, but not funded". Adding continuous heavy transport and fill-hauling trucks to this unmitigated environment poses an unacceptable risk to student lives.
- **3.6 WDC Identified ITA Gaps:** Waimakariri District Council (WDC) has also noted gaps in the Applicant's ITA. In their 9 July 2026 letter to the EPA (Completeness Memo, Appendix 2, pp. 7–8), WDC identified missing data regarding walking and cycling access, trip generation across all modes, cumulative effects, and midblock crash modelling. This supports the Board's conclusion that the full impact and variance on the active transport network remain unquantified.

4. Community Voices: Adverse Effects on a 150-Year Legacy

4.1 The proposed development threatens to inflict unfunded capital costs upon the Ministry of Education and severely compromise the historical, rural educational environment that defines Ōhoka School.

- **4.2 Existing Capacity Limits:** The school is already facing severe capacity constraints. The Ministry of Education recently forced a reduction of the school's home zone because the current roll growth was deemed unmanageable. Adding an entire subdivision of in-zone students to a school whose geographical boundaries have just been shrunk to cope with capacity is an infrastructural impossibility without emergency capital intervention.
- **4.3 No provision for a school in the application:** The Applicant's consultation notes reveal a disturbing lack of commitment to educational infrastructure. The Applicant states that the planned retirement village could become a school, but admits the Ministry of Education "don't engage until things are consented." The Applicant is seeking fast-track approval for 879 residential allotments and up to 250 retirement units without any binding guarantee of a new school. If the MoE does not purchase the land post-consent, the Applicant will simply build the retirement village, leaving the historic Ōhoka School to absorb the huge roll growth alone.
- **4.4 Overwhelming Opposition:** 35 of 39 surveyed respondents (90%) are strongly opposed to the school roll growing over 2 times its current size.
- **4.5 Loss of Rural Character:** 22 of 39 respondents (56%) cited the loss of small rural school culture and community feel as their primary concern. This development is not a natural evolution of the township; it is an overwhelming urbanization of a 150-year-old rural institution.
- **4.6 Community Experience:** The qualitative responses uniformly demonstrate a deep fear of losing the school's identity and straining its resources. Parents stated:
 - *"Absolutely oppose this development. Ōhoka is an already established unique rural community... It would be devastating for the area, and completely change everything we love about Ōhoka and Ōhoka School."*
 - *"If the school were to grow by 2 or 4 times its current size it would lose its rural feel and I would imagine a lot of space the kids now use to run around and play would need to be used for new classrooms."*
 - *"This development going ahead would cause huge health and safety issues for children travelling to school. It would also destroy the special rural character the school has."*

5. Requested Relief and Proposed Mandatory Conditions

In submissions to the panel, we request that people include that if the Expert Panel does not decline this application outright, that the following binding conditions are the absolute minimum required to mitigate the severe adverse effects on student safety and local infrastructure.

Please request that these conditions be attached to any resource consent or approval, complete with strict, stage-linked triggers:

Condition 1: School-Hour Construction Traffic Curfews

- **The Risk:** Continuous heavy vehicle movements on narrow rural roads pose an imminent

threat to students.

- **The Rule:** A total prohibition on all heavy construction vehicles, fill-hauling trucks, and contractor parking on Jacksons Road, Mill Road, and Whites Road between the hours of **8:00 AM–9:00 AM** and **2:30 PM–3:30 PM** on all gazetted school days.
- **The Trigger:** Must be written into the mandatory Construction Traffic Management Plan (CTMP) prior to any earthworks commencing.

Condition 2: Front-Funded Active Transport Infrastructure

- **The Risk:** Adding 879 households and up to 250 retirement units to a network with limited dedicated cycle or pedestrian infrastructure forces children to share the carriageway with commuter and construction traffic. The Applicant admits the Mill Road shared path extension is currently unfunded.
- **The Rule:** The Applicant must fully fund and construct physically separated cycleways and pedestrian footpaths connecting the subdivision directly to Ōhoka School and all local roads that will experience increased traffic.
- **The Trigger:** These active transport routes must be completed and certified for use *prior* to the issue of the first residential code of compliance (Section 224c) for Stage 1.

Condition 3: Safe Drop-Off and Parking Mitigation

- **The Risk:** The school's current parking is already operating at failure capacity. The development's added traffic—and the lack of safety assessment for the Mill Road / Jacksons Road intersection—will result in unsafe, chaotic verge-parking and reversing hazards.
- **The Rule:** The Applicant must provide funded mitigation for school frontage upgrades, including the construction of a dedicated, off-carriageway "drop-off/pick-up zone" to alleviate the congestion caused by their induced traffic demand.
- **The Trigger:** To be designed in consultation with the Waimakariri District Council and the School Board, and completed prior to the occupation of Stage 1 housing.

Condition 4: Mandatory Traffic Assessment and Upgrade of Mill Road / Jacksons Road intersection

- **The Risk:** We could not locate any capacity or safety modelling for the Mill Road / Jacksons Road intersection in the Applicant's ITA, despite it being the primary access point for Ōhoka School. By excluding this, the Applicant's models fail to capture the true peak variance caused by school commuting. Without this empirical data, the intersection poses an unquantified safety risk to students and commuters due to the massive influx of development traffic.
- **The Rule:** The Applicant must commission an independent, full traffic and safety assessment of the Mill Road / Jacksons Road intersection that explicitly models peak school-run traffic. The Applicant must fully fund any required safety and capacity upgrades identified by this assessment.
- **The Trigger:** The traffic assessment must be completed, peer-reviewed, and approved by the Waimakariri District Council prior to any earthworks commencing. All required physical upgrades to the intersection must be completed and operational prior to the occupation of Stage 1 housing.

Condition 5: Staged Alignment with Ministry of Education Capacity and Land Provision

- **The Risk:** The rapid influx of families will force unfunded emergency capital expenditure (e.g., temporary classrooms) and consume existing green space. A large proportion of the school's field space is land privately owned by a local resident and generously made available for the school to use; this land is not available for expansion. Furthermore, the

Applicant explicitly admits their "plan" for a new school relies entirely on the MoE buying the retirement village site.

- **The Rule:** The Applicant must set aside and formally offer the designated "school/retirement village" land to the Ministry of Education for acquisition.
- **The Trigger:** Any later stages of the development must be explicitly tied to the MoE's published roll and capacity figures, ensuring progression only occurs when adequate educational capacity is confirmed at Ōhoka School or the new site.

On behalf of the Ōhoka School Board



Dr Daniel Myall

Presiding Member

Ōhoka School Board

