



FAST TRACK APPROVALS Act 2024(FTAA 2024) TECHNICAL ADVICE

Carter Group Ohoka Substantive Application

File No	FTAA-2606-1253
Date	6 October 2026
Memo To	Kate Barry-Piceno Ōhoka Residential Subdivision Expert Panel Chair
From	Rodney Yeoman, Director, Formative
Subject	Economics

1. EXECUTIVE SUMMARY

This technical advice reviews the economic material submitted in support of the Ōhoka Fast-track Approvals Act application (Ōhoka FTAA), including the Economic Benefits Assessment, Economic Costs Assessment, housing Preference Research and Real Estate Commentary. I have also drawn on my previous involvement in Private Plan Change 31 (PC31), the District Plan Review (DPR) hearings and publicly available economic, demographic, housing and development-capacity data.

In summary the economic case for the Ōhoka FTAA has not been demonstrated. The applicant's assessments rely on unsupported assumptions about demand, delivery, displacement and commercial viability. In my opinion, the proposal would deliver limited regional benefits and materially greater economic costs.

Following key findings:

- **Proposal:** the residential component is substantially the same as previously rejected through PC31 and the District Plan Review.
- **Uncertainty:** there is no credible staging programme, confirmed retirement-village or polo operator, or enforceable commitment securing several activities relied upon by the applicant.
- **Development timeframe:** the assumed ten-year development period is unsupported. Even capturing large share of local demand assumed in the applicants Economic Assessment would require approximately 17 years. Actual completion would probably take longer.
- **Residential demand:** the Real Estate Commentary does not quantify demand for the development. The Preference Research contains substantial errors and framing bias. I consider that effective demand for Ōhoka is more likely to represent

approximately 2-5% of district demand.

- **Housing product:** most proposed housing in Ōhoka FTAA is an urban product. The retirement units, 490 smaller lots and most of the 268 medium-sized lots would compete with housing in established urban areas (Rangiora, Kaiapoi, Woodend-Pegasus, and Christchurch). Only the 121 larger lots are likely to compete materially with rural-lifestyle alternatives.
- **Likely counterfactual:** Most residents would otherwise live in Rangiora, Kaiapoi, Woodend-Ravenswood-Pegasus or elsewhere in Christchurch urban environment. Ōhoka FTAA would therefore produce less efficient transport, infrastructure and accessibility outcomes than the likely urban alternatives.
- **Housing supply:** Waimakariri and Greater Christchurch have ample enabled development capacity and numerous active developers. There is no evidence of monopolistic behaviour or inadequate competition.
- **Affordability:** No affordable housing is proposed and no expected sale prices are provided. Based on the applicant's construction-cost assumptions and likely land values, most dwellings would be priced above the district median. Any affordability benefit would be negligible.

Economic benefits

The Economic Benefits Assessment reports gross activity without adequately accounting for timing, discounting or displacement. Most construction and commercial activity would occur elsewhere in the region if the proposal did not proceed.

I estimate:

- **Net construction benefit:** approximately \$0.7-\$1.3m p.a. during construction.
- **Net ongoing benefit:** approximately \$0.5-\$1.1m p.a. at full occupancy.
- **Affordability and market competition:** effects are likely to be negligible at the district level and immaterial at the regional level.

Economic costs

The Economic Costs Assessment identifies some costs but does not assess the principal economic costs commonly associated with out-of-sequence greenfield development. I consider these costs to be material and to include:

- **Loss of primary production:** approximately \$0.7m p.a. on commencement.
- **Additional transport costs:** more than \$2.6m p.a. at full occupancy.
- **Infrastructure inefficiency:** potentially tens of millions of dollars in capital, financing and network costs.
- **Other effects:** inefficient urban form, greenhouse-gas emissions, environmental effects, reduced accessibility and other externalities.
- **Oversized Local Centre:** The proposed centre is unlikely to be commercially viable at the scale enabled by local demand. A substantial proportion of the land and floorspace is therefore likely to remain vacant or undeveloped for an extended period, representing an inefficient use of a valuable land resource.

Recent legislative amendments may allow the Council to recover more infrastructure costs from the applicant. However, the amount recoverable and the residual burden on ratepayers have not been assessed.

In conclusion, I consider that the applicant has not provided sufficient economic evidence to support approval of the Ōhoka FTAA. The proposal is substantially similar to those previously rejected through the PC31 and District Plan Review hearing processes.

If the applicant's assessments were revised to address the information gaps and methodological deficiencies identified in this review, I consider they would show that:

1. The proposal would not deliver significant economic benefits at the regional or national level and therefore would not advance the purpose of the Fast-track Approvals Act 2024 under section 3.
2. The adverse economic effects would be sufficiently significant to be out of proportion to the proposal's limited regional or national benefits, providing grounds for declining approval under section 85.

Accordingly, I do not support approval of the Ōhoka FTAA on economic grounds.

2. INTRODUCTION

2.1 Purpose of the Memo

This memorandum focuses on the economic assessments submitted in support of the Ōhoka Fast Track Approvals Act application (**Ōhoka FTAA**), together with other application material relevant to economic matters. Its purpose is to assist Waimakariri District Council (**WDC**) and Ōhoka Residential Subdivision Expert Panel Chair in understanding the robustness of the submitted assessments and identifying any material information gaps.

Based on my previous involvement in Private Plan Change 31 (**PC31**), the District Plan Review's Stream 12D hearing (**DPR**), an informal briefing meeting with the applicant's team¹, together with my review of the material submitted with the application, I consider that a comprehensive assessment is necessary to provide WDC and the panel with a robust and accurate understanding of the economic outcomes associated with approval of the Ōhoka FTAA.

Accordingly, in addition to reviewing the applicant's economic assessment, I provide an independent estimate of the key benefits and costs arising from the proposal. I consider that there are material gaps in the submitted evidence, which if not addressed would give the false impression of the economic benefits and costs associated with approval of the Ōhoka FTAA.

2.2 Documents reviewed

For this technical advice I have reviewed the following documents:

- Waimakariri District Councils response to Memo 3, 12 August 2026.
- AEE Ōhoka Residential Subdivision, 19 June 2026, Novo Group, the fasttrack application (**AEE**)
- Economic Assessment - Ōhoka Residential Subdivision, 21 May 2026, Market Economics Limited, Appendix 2 of the application (**Economic Benefits Assessment**).
- Assessment of Economic Costs Proposed Ōhoka Residential Subdivision, 5 June 2026, Savvy Consulting Limited, Appendix 39 of the application (**Economic Costs**)

¹ On 26 August 2026, the applicant (Mr Carter), the applicant's planner (Mr Phillips), and economists (Mr Akehurst and Ms Hampson) provided a briefing on the proposed development and the associated economic issues.

Assessment).

- Hearing Stream 12D: Ōhoka rezoning request Statement of evidence of Carl Davidson (survey), 13 June 2024, Appendix 40 of the application (**Preference Survey**).
- Hearing Stream 12D: Ōhoka rezoning request Statement of evidence of Chris Jones (Real Estate), 5 March 2024, Appendix 41a of the application (**Real Estate Commentary A**).
- Hearing Stream 12D: Ōhoka rezoning request Summary statement of evidence of Chris Jones (Real Estate), 13 June 2024, Appendix 41b of the application (**Real Estate Commentary B**).
- Scheme Plan, 11 June 2026, Inovo, Appendix 26 of the application (**Staging Plan**).
- Ohoka Fast Track Application - Assessment of Potential Loss of Productive Land, Reefside Environmental and Projects, 20 May 2026, Appendix 16 of the application (**Agriculture Assessment**).
- Integrated Transport Assessment, Novo Group, 26 May 2026, Appendix 15 of the application (**Transport Assessment**).
- Greenhouse Gas Emissions Overview for the Ōhoka Residential Subdivision, Lumen, 11 June 2026, Appendix 38 of the application (**Greenhouse Gas Assessment**).
- Economic Evidence of Dr Richard Meade for Environment Canterbury, 9 July 2026, Appendix to ECAN Response to Minute 3.
- I have also drawn on publicly available information from government agencies, including Stats NZ and MCERT, as well as research published by the relevant councils. In addition, I have relied on my previous statements of evidence relating to the Ōhoka and District Plan Review hearings. These sources are referenced in the relevant sections of this technical advice.

2.3 Key areas discussed in this memo

This memorandum is structured in seven sections:

- **Qualifications:** provides my formal training, professional experience, relevant research concerning Christchurch's urban environment, and previous involvement in the Ōhoka hearings.
- **Code of Conduct:** Confirms the professional code of conduct I have followed in preparing this technical advice.
- **Key Issues:** Briefly identifies the economic matters that are critical to assessing the merits of the Ōhoka FTAA proposal.
- **Information Gaps and Clarifications Required:** Identifies the additional information and clarification needed to provide a robust assessment of the proposal.
- **Areas of Agreement:** Identifies the aspects of the applicant's economic assessments with which I agree and consider sufficiently reliable.
- **Independent Economic Assessment of Benefits and Costs:** Given the information gaps, outstanding clarifications and material areas of disagreement identified, I have undertaken an independent assessment of the proposal's economic benefits and costs. This provides WDC with a robust understanding of

the economic issues relevant to assessing the proposal's overall merits.

- **Recommendations and Conditions:** Provides my recommendations for addressing the identified economic issues, information gaps and areas requiring clarification, including through conditions where appropriate.
- **Overall Position and Conclusions:** Summarises my technical advice to WDC on the economic outcomes associated with the proposal, both against the relevant FTAA criteria and in relation to its broader merits.

3. QUALIFICATIONS

I hold the degrees of Bachelor of Commerce and Bachelor of Laws from the University of Auckland. I also hold Postgraduate Honours in Economics from the Australian National University.

I have over 20 years consulting and project experience, working for commercial and public sector clients. I specialise in policy assessment, industry and markets research, the form and function of urban economies, the preparation of forecasts, and evaluation of outcomes and effects.

I have applied these specialties in studies throughout New Zealand, and in Australia, across most sectors of the economy, notably assessments of district plan policies and rules, urban form, land demand, housing, and other local government issues.

I have extensive experience undertaking assessments under the Resource Management Act (**RMA**), National Policy Statement on Urban Development (**NPS-UD**), National Policy Statement for Highly Productive Land (**NPS-HPL**), and various other resource management legislation.

I have local experience in Waimakariri, Selwyn, and Christchurch providing research for Waimakariri District Council, Selwyn District Council, Christchurch City Council, Greater Christchurch Partnership, Environment Canterbury, and developers for more than ten years.

Most relevantly, I provided evidence in relation to rezoning this land through PC31, then again during the Stream 12D hearing in the DPR, and in other parts of the DPR process (rezoning hearings for the main towns and also Mandeville North).

Also of importance is my research is applied in the 2023 Housing Capacity Assessment² (**HCA**) and I provided economic evidence in the Greater Christchurch Spatial Plan (**GCSP**) hearing³. I have also provided research and evidence in this area for District Plan Reviews⁴, Intensification Planning Instruments⁵, several dozen Private Plan Changes, Fast track applications, and Environment Court appeals.

I am a member of New Zealand Association of Economists, Population Association of New Zealand, and New Zealand Association for Impact Assessment.

4. CODE OF CONDUCT

I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This technical review has been prepared in accordance with that Code. In particular, unless I state otherwise, the opinions I express are within my area of expertise, and I have not omitted to consider

² Greater Christchurch Partnership (2023) Greater Christchurch Housing Development Capacity Assessment.

³ Greater Christchurch Partnership (2024) Greater Christchurch Spatial Plan.

⁴ Selwyn and Waimakariri.

⁵ Selwyn, Waimakariri, and Christchurch.

material facts that might alter or detract from the opinions that I express.

5. KEY ISSUES

There are six key economic issues associated with the Ōhoka FTAA proposal:

1. **Ōhoka FTAA:** The proposed development has gone through a number of iterations, and there is internal inconsistency between the assessments. It is important to establish an understanding of the activity that is proposed.
2. **Residential demand:** The extent of existing preference for low-density housing in the Ōhoka settlement, which is distinct from medium-density housing across the wider Waimakariri Urban Environment.
3. **Housing supply:** The nature and scale of the housing supply proposed by the Ōhoka FTAA development, considered alongside the enabled supply of medium-density housing in the wider Waimakariri Urban Environment.
4. **Economic Benefits:** Within this market context, the scale of the one-off construction benefits and ongoing economic activity that can reasonably be attributed to the proposal.
5. **Wider economic effects:** The broader economic benefits and costs associated with the proposal, including its contribution to a well-functioning urban environment, infrastructure efficiency and other externalities. Also the scale, nature and economic efficiency of the proposed local commercial centre.
6. **FTAA Significant Threshold and Balancing Criteria:** Whether the proposal would satisfy the purpose of the Act by delivering significant economic benefits at a regional or national level and whether the proposal meets the criteria for rejection under the Act on the basis that its costs outweigh its benefits.

These issues are covered within the following technical advice.

6. INFORMATION GAPS AND CLARIFICATION REQUIRED

6.1 Ōhoka FTAA

The Ōhoka proposal has gone through many iterations, and in the previous rounds there have been inconsistencies between the proposed activities and assessments undertaken by each subject matter expert, which had implications in terms of the outcomes, both costs and benefits.

Furthermore, as I understand it FTAA applications need to be sufficiently certain in their framing, and an application that is generic or attempts to include new activities beyond the application would necessarily mean that the application must restart.

Therefore, I consider that it is important to have a complete understanding of what is now proposed and how that aligns with the assessments undertaken by each of the applicant's experts:

- **Development Phasing:** the development plan comprises eleven stages. Although the assessment assumes an indicative ten-year development period, no delivery programme assigns commencement or completion dates to the individual stages. This has important implications in terms of the scale of the activity that can be expected and the outcomes.
- **Residential Dwellings:** The proposal has been refined into 879 residential

allotments and a combined area of approximately 81.8ha.⁶ While the new (879-lot) plan has slightly more lots than original PC31 indication of 850 dwellings, it remains within the previously identified yield ranges in PC31 and Stream 12D. The current Ōhoka FTAA layout is, however, more intensive than the earlier indicative residential mix.⁷ During the informal briefing meeting on economic issues, the applicant, planner and economists indicated that in their view the development was substantially the same as the proposal previously considered through the hearings.⁸ I consider that the differences between PC31, the DPR proposal and the Ōhoka FTAA are relatively minor. I therefore agree with the applicant that the residential component of the proposal has not materially changed.

- **Retirement Village:** has increased with the current proposal now suggesting 250 units on 8.9ha of land. This is an increase compared to the previous proposals which had around 7ha of land set aside for retirement village. Again, during the informal briefing meeting it was noted that an operator has not yet been confirmed, the concept is to provide independent-living units, with no hospital-level care, dependent-care accommodation or health services.⁹ Although an operator has not been confirmed, I consider there is a reasonable prospect that the retirement village would be developed if the wider proposal proceeds. However, if no operator is secured, the land may instead be developed for conventional residential purposes. This would increase the proposal's residential capacity and further increase its potential to divert growth from the existing urban environment.
- **Commercial Centre:** has increased in intensity from previous versions of the proposal with 9,400m² of floorspace (GFA) and Local Centre Zone on 1.5ha of land, whereas the initial proposals were for 6,000m² of floorspace (GFA) and 2.7ha of land. The most recent proposal in the Stream 12D hearing also had suggested 1.5ha of land and a 2,700m² GFA cap on retail activities.
- **Polo Field:** the proposed 9ha polo field would be privately owned. However, the lodged material does not identify an operator or polo club, or include a lease, funding commitment, letter of intent or operating agreement. On that basis, the polo field appears to be an enabled future use rather than a committed component of the development. If the polo field activity proves unviable, the land may subsequently be proposed for an alternative use (such as more residential) that falls outside the scope of the current FTAA application. However, during the informal briefing the applicant offered to provide evidence of interest from a commercial operator to demonstrate that the proposal is more than speculative.¹⁰
- **Ōhoka Farmers Market:** tentatively, the AEE suggests that the commercial super-lots could possibly host the existing Ōhoka Farmers Market during winter.¹¹ The existing Friday market currently operates at Ōhoka Domain and there is no firm commitment that this will shift to the super-lots. During the informal briefing meeting it was noted that there was no such intent and that the Farmers Market would not be hosted within the development. I consider this to be a minor issue. Whether or not the market is accommodated within the development would have minimal

⁶ There are 490 lots (56%) range from 425m² to 700m² and average 605m²; 268 lots (30%) range from 701m² to 2,000m² and average around 800m²; and 121 larger lots (14%) range from 2,000m² to 4,000m² and average 0.3ha.

⁷ Previous versions had more Large Lot Residential lots (150) and the smaller lots were averaged 800m². The new proposal has 121 Large Lot Residential and 758 small lots with an average of approximately 670m².

⁸ On 26 August 2026, the applicant (Mr Carter), the applicant's planner (Mr Phillips), and economists (Mr Akehurst and Ms Hampson) provided a briefing on the proposed development and the associated economic issues.

⁹ Ibid.

¹⁰ On 26 August 2026, Mr Carter.

¹¹ AEE para 357.

implications from an economic perspective.

- **School Proposal:** the AEE makes it clear that although a school was suggested in the past (both in the previous plan change hearings and when listed as FTAA), there is no longer a school included in the development. I consider this to be a minor issue from an economic perspective. However, it may be relevant to the assessment of the proposal's social impacts, as some children living within the Ōhoka FTAA may need to travel greater distances to attend schools elsewhere in the urban environment.

I consider that there are still gaps and uncertainty about the nature of the proposed activity allowed in the Ōhoka FTAA.

There is insufficient clarity regarding the development timeframe, the expected timing of each stage, and the demand. Although the economic assessments both assume a ten-year development period, this assumption has not been aligned with the eleven-stage development plan or any market assessment of demand. Clarification of the anticipated staging, delivery programme, and market demand is therefore required. This aspect was raised in the informal briefing meeting on economics, and the applicant's economists agreed to provide further information and update their assessments to account for the development timeframes.

Also, there is an information gap regarding the basis for assuming that either the polo ground or a farmers' market will be established, or the retirement village. All depend on decisions by independent private organisations, yet no operator, lease, agreement, funding commitment or delivery condition has been identified. Unless these activities are secured through enforceable conditions, the polo/commercial super-lot/retirement village land may remain undeveloped and/or accommodate other activities beyond the FTAA application (most likely more residential housing). This aspect was raised in the informal briefing meeting on economics, and the applicant agreed to provide further information on the polo field.

6.2 Economic Benefits Assessment (Greg Akehurst, Market Economics)

The Economic Benefits Assessment (Appendix 2) identifies the following benefits associated with the Ōhoka FTAA:

- Increased housing supply of approximately 88 dwellings per annum over a ten-year development period, with potential benefits for housing affordability and housing choice. The assessment considers this additional supply to be significant in relation to Policy 8 of the NPS-UD.
- Improved competition in the residential land market through the addition of development capacity, which is expected to reduce the potential exercise of market power by existing landowners and developers.
- A commercial centre containing retail, commercial-service and healthcare activities that would meet some of the needs of residents of the Ōhoka development and the surrounding area. Under a market-led development scenario, the Local Centre Zone could accommodate up to 9,390m² of floorspace. These businesses would provide a range of services and could help support the viability of public transport connections between Ōhoka and larger centres.
- One-off construction activity is estimated to generate gross GDP of approximately \$40m per annum over ten years and support the equivalent of 369 jobs per annum.
- Ongoing commercial-centre activity estimated to generate approximately \$24m of GDP per annum and support 462 jobs once the centre is fully occupied.

As noted in Waimakariri District Council's response to Memo 3 (12 August 2026), there are

gaps in the Economic Benefits Assessment. These were discussed in the informal briefing meeting with the applicant's team and the applicant's economist agreed to provide further detail to address these issues.

In summary the key issues and gaps are:

- **Development timeframe, discounting, and benefits realisation:** The estimated economic activity should be expressed in net present value terms using a commercial discount rate of 8%, which would materially reduce its value relative to the undiscounted total. Evidence is also required to support the assumed ten-year development period, as no clear basis for that timeframe is provided in the submitted material. If development occurs over a longer period, the annual effects would be lower and the present value of the claimed benefits would reduce further. This has implications for the quantified GDP values for One-off development and Ongoing commercial-centre.
- **Gross economic impacts vs net economic benefits:** the reported GDP and employment impacts are presented in gross terms, with no adjustment to estimate the net economic benefits. Cost assessment indicates that much of the proposed development is unlikely to be net new to the Waimakariri District or the wider region, but rather displaced from elsewhere. As a result, the reported GDP and employment impacts will overstate the net economic benefits attributable to the development.
- **Geographic scope of benefits:** The FTAA requires that economic benefits be significant at the regional level. However, the assessment primarily reports impacts at the local level. The assessment should clearly identify the appropriate geographic area for evaluating economic benefits under the FTAA and demonstrate that the significance threshold is met at that scale. If the relevant assessment geography is the region, then reliance on local-level impacts will overstate the significance of the proposal.
- **Settlement population:** The assessment reports a population of 1,720 people using the SA2 level, which includes the wider rural and rural lifestyle areas surrounding Ōhoka. This overstates the size of the settlement and may give a misleading impression of the scale and growth of the local community. The population of the Ōhoka settlement should instead be assessed using Census or Stats NZ data at the SA1 level, which more accurately reflects the settlement itself. Stats NZ data at the SA1 level shows that Ōhoka's population increased from approximately 250 people in 1996 to around 370 in 2025. This is slow growth of only about four people per annum over almost 30 years.¹²
- **Housing affordability:** The assessment considers housing affordability in the Waimakariri District in isolation, without comparing outcomes across the wider Greater Christchurch Partnership area or other Tier 1 urban environments. It also does not consider observed market outcomes, which indicate that housing in Waimakariri is generally more affordable than in many comparable Tier 1 urban areas. Consequently, the assessment provides limited evidence that housing affordability is a significant issue requiring intervention through the proposed development. Furthermore, the assessment does not provide an indication of the likely cost of housing within the proposed development itself. This could be estimated using the assumed construction costs and land development costs to determine whether the proposed dwellings are likely to improve housing affordability in practice.
- **Development capacity:** The assessment relies on the WCGM22 capacity

¹² SA1 7024138 and 7024165.

assessment, which is now out of date. Since its publication, the Proposed District Plan has enabled a significant increase in residential development capacity, particularly through additional greenfield zoning. The assessment should consider the implications of this additional capacity when evaluating the need for the proposed development. The application should also assess the extent to which redevelopment and intensification opportunities are likely to increase over time, providing further feasible development capacity within the district. Consequently, the assessment does not provide an up-to-date or complete picture of the availability of residential capacity.

- **Monopolistic conditions, market power, and partial monopoly:** The assessment does not provide evidence supporting the presence of monopolistic conditions or significant market power in the Waimakariri housing market. Available indicators, including recent price trends and observed developer activity, suggest that prices have been declining and that supply is being delivered by multiple developers in a competitive market environment. In addition, price-to-cost ratios appear to be broadly within competitive ranges, which is not consistent with the existence of sustained market power or constrained competition. As a result, the assertion of monopolistic conditions is not substantiated by the available evidence.
- **Centre occupancy and phasing:** The assessment does not incorporate development phasing or model the likely uptake and occupancy trajectory of the proposed centre over time. Instead, it relies on an economic cost assessment that does not explicitly evaluate demand for floorspace, tenancy absorption rates, or the timing of occupation. As a result, there is limited evidence as to how quickly the centre would reach viable occupancy levels or whether sufficient demand exists to support sustained tenancy. A more robust assessment would explicitly model occupancy uptake over time, linked to realistic demand forecasts and staged development delivery.

While I acknowledge that the applicant's economist (Mr Akehurst, Market Economics) has agreed to provide further detail addressing the issues identified above, that material was not available when this technical review was completed.

6.3 Economic Costs Assessments (Natalie Hampson, Savvy Consulting)

The Economic Cost Assessment (Appendix 3) identifies the following costs associated with the Ōhoka FTAA:

- Effects of the proposed Ōhoka Local Centre (LCZ) on existing centres and their role in serving the surrounding community. It estimates the floorspace that could be developed, the activities that could occupy that space and the level of local demand that may be redirected from other Waimakariri centres, having regard to existing commuting patterns. Importantly, the redirected household growth and expenditure is not treated as new or additional demand to the district.¹³ The estimated effects on most other Waimakariri centres are small and would be offset by expected growth in those locations. Mandeville North is the exception, with an estimated impact of approximately 24-33%, which is more than minor. The assessment indicates that it could take approximately 7-12 years for Mandeville North centre to recover from this effect.
- Loss of primary production from the land, which is currently used as a dairy farm. While this land is not technically covered by NPS-HPL because the underlying Rural Lifestyle zone, the site is LUC2 and LUC3 highly productive land and is productive. Therefore, the approval of Ōhoka FTAA will result in a loss of rural production. This

¹³ Economic Costs Assessment considers that new demand attraction "is not considered likely or realistic".

is valued at \$8.2million in GDP over the coming 30 years (which the assessment considers to be negligible) or around 4 jobs each year.

- The report acknowledges other economic disbenefits, such as wetlands, archaeological, transport and infrastructure, but these are addressed by other experts so are not quantified. However, it is considered in Economic Cost Assessment that because of the assumed redistribution of households from other rural areas in Waimakariri that the Ōhoka FTAA will be “neutral” in terms of supporting a well-functioning urban environment (i.e. travel outcomes will be similar and growth in main towns unchanged). The report also considers that there may be slower recovery of costs for infrastructure in other locations and increased need for infrastructure in Ōhoka (e.g. schools).

As noted in Waimakariri District Council’s response to Memo 3 (12 August 2026), there are gaps in the Economic Cost Assessment. These were discussed in the informal briefing meeting with the applicant’s team and the applicant’s economist agreement to provide further detail to address these issues.

In summary the key issues and gaps are:

- **Urban form and economic efficiency:** The assessment does not consider the economic costs associated with facilitating growth in the proposed location relative to more central or higher-density areas. From an urban economics perspective, dispersing growth to peripheral locations can increase infrastructure servicing costs, transport costs, and wider agglomeration inefficiencies compared with accommodating growth in more central locations where existing networks, amenities, and labour market access are stronger. These factors can reduce overall economic productivity and weaken the efficiency of urban form. Accordingly, the assessment does not adequately address whether the proposed location supports a well-functioning urban environment when compared with alternative, more central development locations.
- **Infrastructure costs and network efficiency:** The assessment does not quantify the full infrastructure implications of the proposed development. While development contributions may recover a portion of infrastructure costs in the immediate location, the analysis does not assess the broader system-wide effects, including the potential duplication of infrastructure capacity and reduced utilisation of existing infrastructure elsewhere in the network required to service already planned or approved future developments. This may result in underutilised sunk assets and slower cost recovery in other areas, generating inefficiencies at the district level. These wider economic costs are not quantified in the assessment. A more complete analysis should estimate both the incremental infrastructure costs in the development location and the opportunity costs associated with reduced utilisation of existing infrastructure across the wider network.
- **Floorspace viability and demand modelling:** The centre assessment does not model demand for other retail, commercial, community, and health-related activities. It only assesses food, grocery, and liquor activity in the context of the other centres and demand in the district. As a result, there is limited evidence supporting the proposed scale and composition of floorspace within the LCZ. Given the relatively large provision of floorspace that is proposed, the assessment should provide clear modelling justification for the quantum and mix of space proposed, including expected uptake rates across different activity types and alignment with local and district-wide demand projections. In the absence of such analysis, it is unclear whether the proposed floorspace can be fully supported by underlying demand or whether it risks over-provision relative to realistic absorption rates.

While I acknowledge that the applicant's economist (Ms Hampson, Savvy Consulting) has agreed to provide further detail addressing the issues identified above, that material was not available when this technical review was completed.

6.4 Preference Research (Carl Davidson, Research First)

The veracity of survey results in the Preference Survey (Appendix 40) provided by the applicant was questioned by the commissioners in the DPR hearing Stream 12D. The economists in Stream 12D were directed to undertake conferencing to answer *“Does Research First survey question 5, which suggests 21% of respondents would want to live in Ōhoka, reasonably represent demand preferences for location (noting that the responses add to 176%)?”*¹⁴

The applicant's economists did not undertake conferencing or otherwise respond to the commissioners' concern. I agree that the survey results require clarification. The percentages reported for Question 5 total substantially more than 100%, despite the question asking which single area respondents would “most like to live in”. The same issue arises in Question 6, where the reported percentages total more than 200%, suggesting a systematic problem in the survey.

Potentially, respondents were permitted to select or rank multiple locations. But if multiple responses were permitted, the data in the figures cannot be interpreted as shares of respondents' single preferred location.

This same material has been presented again by the applicant to support this FTAA and is referenced in the AEE as evidence of high demand for Ōhoka,¹⁵ and the Economic Cost Assessment has relied on this survey¹⁶. During the informal briefing meeting this survey data was discussed and I suggested that the economist consider the reliability of this material as this was an issue raised in the DPR hearing, and I considered that it is mathematically impossible for this result to be correct.¹⁷

Additionally, I am concerned that in Questions 5 and 6 the respondents were presented with only a subset of locations within Waimakariri District, with no options in Christchurch or Selwyn. This is known as ‘restricted choice set bias’, when respondents are required to choose from a restricted set of options, the selected options will necessarily receive a higher response rate than they would if the full range of realistic alternatives were available.¹⁸ In the real world, households considering where to live are not limited to the locations included in the survey. Once the broader housing markets of Christchurch and Selwyn are included, demand for Ōhoka would reasonably be expected to be materially lower than the Preference Survey suggests.

More fundamentally, a generic question about preferred location does not provide a reliable measure of demand for the housing proposed by the Ōhoka FTAA. This is known as ‘hypothetical bias’, where respondents were not given information about the type, size or price of the housing they would be purchasing, nor was their ability or willingness to pay assessed. This is a well known design flaw in preference surveys, whereby respondents are asked to express a hypothetical preference which they would never pick in practice.

¹⁴ MINUTE 31 - EXPERT CONFERENCING AND NEXT STEPS FOR HEARING STREAM 12D.

¹⁵ Para 308-310.

¹⁶ Appendix 39, Page 6.

¹⁷ On 26 August 2026, the applicant (Mr Carter), the applicant's planner (Mr Phillips), and economists (Mr Akehurst and Ms Hampson) provided a briefing on the proposed development and the associated economic issues.

¹⁸ By analogy, if at an event I offered you only Coke or Pepsi to drink, a relatively high proportion of people may select Coke. If the choice set is expanded to include other soft drinks, water, fruit juice, coffee, tea, wine and beer, Coke's share will inevitably decline as respondents select alternatives that better reflect their preferences. Similarly, the reported preference for Ōhoka is likely to be overstated because respondents were presented with a restricted choice set that excluded many realistic alternatives in Christchurch and Selwyn.

In this case, of course a lot of people would want (or like) a large house, on a sizeable section, or in a high amenity rural settlement such as Ōhoka, but most would not be able to afford it or even if they could would not select this alternative. Importantly, real world housing decisions involve trade-offs between location, dwelling characteristics, accessibility, price, and households' own ability to afford (i.e. income and wealth).¹⁹

Furthermore, respondents will have based their selection of Ōhoka as it currently exists: a small rural settlement characterised by rural amenity, large properties and a quiet centre with only a single service station. They were not informed that the proposal would introduce an urban development comprising lots averaging approximately 670m², a large retirement village and a local centre capable of accommodating several dozen commercial tenancies. This is known as 'framing bias' or attribute-omission, providing information about the likely housing and the proposed change in the settlement's scale and character may have materially affected respondents' choices.²⁰

I also note that Question 6 asks respondents to assume that "*all areas within the Waimakariri District have all the same facilities etc available to you (i.e. schooling, supermarkets and transport)*". This hypothetical world of ubiquitous and equivalent services is unrealistic. Even with the proposed large LCZ, Ōhoka could not provide the same range, scale or frequency of services and transport available in Rangiora, Kaiapoi, Woodend, or Christchurch Urban Environment. Critically, many services are viable only where there is sufficient population and demand, and Ōhoka would remain too small (even with Ōhoka FTAA) to support an equivalent offering.

This framing in the question therefore removes a real and enduring disadvantage of the location. While it may indicate respondents' preferences when accessibility constraints are artificially removed, it provides no reliable evidence of effective demand under the likely conditions. It is likely to overstate demand for Ōhoka because respondents were asked to assume away the limited access to services that would materially influence a genuine housing decision.

I therefore recommend that the applicant's economist consider the poor framing (the three types of bias noted above) and also the response rate inconsistency of the survey when they review the material. In my opinion the Preference Survey (appendix 40) does not provide a reliable measure of effective demand for the Ōhoka, or for that matter Ōhoka FTAA proposal. Putting it simply, it is not credible that nearly one-quarter of households would demand housing in Ōhoka.

This aspect of the case needs to be clarified as it is the basis for the Economic Cost Assessment scenarios, which assumes that there is high demand for Ōhoka and for that matter the Ōhoka FTAA.

6.5 Real Estate Market Commentary (Chris Jones, Bayleys)

The FTAA application includes Real Estate Commentary that was presented at the DPR hearing Stream 12D (Appendix 41a and 41b).

This commentary provides qualitative discussion of enquiries, online property searches and several recent sales. This supports a general proposition that Ōhoka is an attractive

¹⁹ Again by analogy, if at an event I offered you champagne or water, many people may prefer champagne. If they are then informed that the glass of champagne costs \$20, some could reasonably be expected to choose water instead because of their budget and preferences. Similarly, stated interest in Ōhoka cannot be treated as effective housing demand without information about dwelling prices and respondents' willingness and ability to pay.

²⁰ By analogy, asking whether someone would like their usual glass of wine, without telling them that its ingredients, flavour, serving size and price will all change, does not measure demand for the changed product. Their answer reflects the wine they already know. Similarly, respondents' stated preference reflects Ōhoka as they currently understand it, rather than the materially different settlement proposed by the FTAA which they were not told.

and sought-after location. However, much of the commentary is anecdotal, for example, that most buyers would consider Ōhoka and that Ōhoka sections would sell before comparable sections elsewhere. It does not quantify the number of purchasers, the depth of demand, likely annual sales or the period required to absorb the proposed supply.

The commentary provides some indication of demand for existing lifestyle and large-lot properties. The cited examples, however, predominantly concern established properties of approximately 0.5ha or lifestyle blocks of 4 ha or more. There is no systematic analysis of sales volumes, enquiry conversion rates, time on the market, competing supply, prices or buyer preferences.

In my view, the commentary has a gap, in that it does not provide quantifiable evidence of 'high' demand for either traditional Ōhoka housing (large lots) or urban style housing in Ōhoka. There is no evidence of demand specifically for urban-sized sections of approximately 600-700m², as the observed sales mentioned in the commentary relate to materially different properties (i.e. 5000m² to 40,000m² properties). The statements therefore provide professional market opinion, but not a quantified demand assessment capable of demonstrating demand for the scale and form of development proposed in Ōhoka FTAA.

The AEE relies on this commentary to claim, "*high demand for residential housing in the Ōhoka area, particularly when compared to other townships in the Waimakariri District, such as Kaiapoi and Rangiora*".²¹ No quantitative evidence is provided to demonstrate that demand for housing in Ōhoka is high relatively compared to Kaiapoi or Rangiora.

To the contrary, the substantially greater scale and continuity of residential development and sales activity in Kaiapoi and Rangiora indicate materially stronger realised demand in those established urban areas. While development activity is also influenced by the availability of zoned land and infrastructure, the applicant has not provided evidence capable of supporting the opposite conclusion.

I consider that there is some demand, but by no means 'high' levels of demand and definitely not enough to support the development of the submitter's land as proposed. I agree that the submitter's proposal would provide a wider range of development options than are present in Ōhoka, as most of the lots will be urban in nature (i.e. 670m² or less).

However, there was allowance under the previous District Plan to subdivide down to 600m² in Ōhoka (Residential 3) which could have enabled smaller lots to be established. This allowance has been carried over into the Settlement zone in PODP. No such subdivision has occurred, which suggests that demand for small scale subdivision of this density has not existed in the past.

There may be an unrealised market for large scale subdivision (i.e. a market in which there is demand but that is not able to be converted into sales) from the viewpoint of the local Ōhoka area, but not when considered in the context of the Rangiora, Kaiapoi, Woodend, or the wider Christchurch Urban Environment. I agree that this proposal would likely be appealing to a wide cross-section of people and it would need to draw growth away from the three main towns to be viable (Rangiora, Kaiapoi, Woodend or wider Christchurch Urban Environment).

I consider that this remains a material information gap. The question posed by the commissioners in Hearing Stream 12D "Has it been demonstrated that there is specific demand for housing in Ōhoka?"²² has not been satisfactorily answered. The material

²¹ Para 309.

²² MINUTE 31 - EXPERT CONFERENCING AND NEXT STEPS FOR HEARING STREAM 12D.

establishes general interest in Ōhoka but does not quantify effective demand for the scale, density and housing products proposed.

6.6 Social Impacts

While this technical advice focuses on economic outcomes, Formative is a multidisciplinary research consultancy with experience assessing the social impacts of other FTAA projects.

No social impact assessment or expert social evidence has been provided for the Ōhoka FTAA proposal. In the previous Ōhoka hearings, I identified unassessed effects on community wellbeing, access to services, local character and amenity, and social infrastructure.

Furthermore, while the large number of submissions in the previous Ōhoka hearings does not itself establish adverse effects, it highlights significant community concerns which should be addressed and require assessment.

Schedule 5, clause 7 of the FTAA requires the AEE to address effects on neighbouring and wider communities, including social effects. The AEE contains only limited references to these matters and does not provide a systematic assessment of the proposal's social outcomes. I therefore consider that an assessment by an appropriately qualified social-impact practitioner is required, which is a gap in the evidence provided for the application.

7. AREAS OF AGREEMENT

I agree with the following areas of the applicant's economic evidence, and do not consider that further detail is required on those matters:

- 1) **Ōhoka Settlement Residential Demand:** the Real Estate Market Commentary (Appendices 41a and 41b) and the Preference Survey (Appendix 40) provide some support for the proposition that Ōhoka is a rural settlement that some people would like to live. I agree that this material indicates a degree of demand for low-density housing in and around the existing settlement.

However, to be clear this material does not demonstrate that there is "high" demand, when considered in the context of the District or wider urban environment, nor does it establish sufficient effective demand to support the proposed scale, delivery timeframe, density or mix of housing products within the Ōhoka FTAA.

- 2) **Loss of Primary Production:** is likely to be relatively small in the context of the regional economy and the estimate of \$8.1million in GDP or 4 jobs per annum in the Economic Cost Assessment (Appendix 39) is acceptable. This value is broadly consistent with Formative's assessment undertaken for PC31.

However, the irreversibility of urbanisation, the finite soil resource, and the need for rural productive land to ensure food security for future generations means that the subdivision of rural land can cause a sustained long term loss which cumulates through time. The short term decision by the farmer and developer to subdivide a rural lot will consider market conditions today, but not the wider long term impacts. Therefore, I consider that this is a matter that should be taken into account in assessing the overall merits of the Ōhoka FTAA.

- 3) **Ōhoka Centre Distributional Effects:** are likely to be spread across a number of centres in Waimakariri, and the background growth will be sufficient to ensure that activity in most centres will recover such that the role of the centres are not harmed. Mandeville North is the exception, with an estimated impact of approximately 24-33%, which is more than minor. The Economic Cost Assessment (Appendix 39)

indicates that it could take approximately 7-12 years for Mandeville North centre to recover from this effect.

While I disagree with the source of households that will live in the Ōhoka FTAA, this aspect of the assessment is not likely to change the centre distributional effects finding significantly.

- 4) **Other Costs:** The Economic Costs Assessment (Appendix 39) identifies potential costs associated with wetlands and archaeological values. I agree that these effects could be economically valued using stated-preference or revealed-preference methods. I agree that in this case they can be assessed by the relevant technical experts, and assigning monetary values to them may not materially assist the overall assessment of the Ōhoka FTAA.

However, I disagree with the assessment's findings of neutrality in relation to transport, infrastructure efficiency and the achievement of a well-functioning urban environment. These effects are commonly assessed by economists when evaluating greenfield developments and are critical aspect of economic outcomes. They are potentially significant and should have been assessed and, where practicable, quantified in the Economic Costs Assessment.

- 5) **Net Present Value and Commercial Discount rate (8%):** I agree with the Economic Costs Assessment (Appendix 39) which applies standard methods for converting future values into comparable current values. I also agree that in the case of commercial development an 8% discount rate is appropriate. This method is adopted when assessing the value of the lost of primary production.

As noted above, the applicant's economist that undertook the Economic Benefits Assessment (Appendix 2) has not applied this standard method which means the benefits are not presented in consistent terms as the costs. During the informal briefing meeting with the applicant's team it was agreed that this would be corrected.

- 6) **Housing Demand New or Redistribution:** I agree with the Economic Costs Assessment (Appendix 39) that the growth accommodated by the Ōhoka FTAA would be redirected from elsewhere within the district or region, and that the attraction of wholly new demand is "not considered likely or realistic". The appropriate counterfactual is therefore one in which broadly the same regional demand for housing occurs without the Ōhoka FTAA, but is accommodated in other locations. The economic outcomes of the proposal must be assessed against this baseline.

The Economic Benefits Assessment (Appendix 2) does not adequately address this issue and instead presents gross GDP and employment impacts, which is misleading. Those impacts are not specific to the Ōhoka FTAA and would largely arise elsewhere as the same housing demand and construction activity would be accommodated in alternative developments. During the informal briefing with the applicant's team, it was agreed that this issue would be addressed in an updated assessment.

- 7) **Ōhoka FTAA Residential Supply:** I agree that some of the lots proposed within the Ōhoka FTAA would be similar to the housing product currently sought in the small settlements in the District. The proposal includes 121 lots ranging from 0.2ha to 0.4ha, to be developed in Stages 11 and 12 at the southern end of the site. Although these lots would generally be smaller than existing properties in Ōhoka, they are broadly comparable and may meet some established demand for large-lot housing in this location.

However, I disagree with the applicant's economists and real-estate expert, who consider that the remaining lots would provide a product materially different from the urban residential housing available elsewhere in the district. The 758 small-medium sized lots that average 670m² each are broadly comparable to residential available in Rangiora, Kaiapoi and Woodend. I therefore do not accept that demand for these lots would be drawn primarily from the district's rural areas, as they are more comparable to the options in the urban environment.

This distinction was a central issue in the previous Ōhoka Plan Change processes and remains fundamental to the economic assessment of the Ōhoka FTAA. If most of the proposed housing would compete with established urban areas, the assessment must account for the displacement of growth and associated economic activity from those locations when estimating the proposal's benefits and costs.

8. INDEPENDENT ECONOMIC ASSESSMENT OF BENEFITS AND COSTS

As identified above in section 4, there are six key economic issues that should be considered with respect to the Ōhoka FTAA proposal: the nature of the proposed development; the residential demand outlook; the residential supply outlook; the scale of the economic benefits; the wider economic effects; and the assessment of those outcomes within the FTAA decision-making framework. I cover each of these key issues in the following assessment.

8.1 Ōhoka FTAA

The proposed development has gone through a number of iterations during the previous plan change processes, and as there is internal inconsistency between the assessments it is important to establish an understanding of the activity that is proposed.

It is fundamental to understand the nature of the residential activity proposed within the Ōhoka FTAA. This will influence the types of households likely to purchase the housing and, critically, where those households would otherwise live if the proposal were not approved.

The nature of the proposed housing therefore has direct implications for the assessment of travel patterns, transport costs, infrastructure efficiency, contribution to a well-functioning urban environment, greenhouse-gas emissions, loss of productive land, economic activity and housing affordability. Almost all of the benefits and costs identified in the application depend on the conclusions reached about the housing products provided and the likely alternative locations of future residents.

The Ōhoka FTAA has four main types of residential, in decreasing order of density:

- 250 retirement-village units on 8.9ha of land, an average of one unit per 356m².
- 490 small lots (56%) range from 425m² to 700m² and average 605m².
- 268 medium lots (30%) range from 701m² to 2,000m² and average around 800m².
- 121 larger lots (14%) range from 2,000m² to 4,000m² and average 0.3ha.

First, the retirement units proposed in the Ōhoka FTAA development are broadly comparable to the density achieved in the recent retirement developments in the main urban areas of the District. As an example,

- **Rangiora:** Harlow Village (average of 317m² per unit) and Summerset (average of 407m² per unit).
- **Kaiapoi:** The Stirling (average of 374m² per unit) and proposed Beachgrove

(201m² per unit).

- **Woodend-Ravenswood-Pegasus:** Freedom Lifestyle Village (367m² per unit).

I have also reviewed recently developed and proposed retirement villages in Selwyn's main urban areas (Rolleston, Prebbleton, Lincoln and West Melton). These generally provide approximately 400-600m² of gross land per residential unit, compared with approximately 356m² per unit proposed by the Ōhoka FTAA.

The Ōhoka FTAA retirement units are therefore likely to resemble medium density retirement housing being provided in the wider Greater Christchurch urban market. They would primarily compete for residents with villages in the urban locations, rather than provide a distinct rural or low-density retirement product.

The application documents (Economics, Real Estate, and Preference Research) do not address or describe the nature of the proposed retirement units, nor do they establish how they differ from existing urban retirement-village products, or assess the market from which their residents would be drawn.

I consider that if the Ōhoka FTAA was not approved then the retirees would be accommodated elsewhere in the Greater Christchurch urban market, particularly in locations such as the retirement developments identified above (Harlow Village, Summerset Rangiora, The Stirling, etc.). These alternative locations generally provide better access to healthcare, community facilities, public transport and the wider community. All of which will impact the assessment of economic benefits and costs associated with the Ōhoka FTAA.

Furthermore, while I am not a social-impact specialist, I understand that accessible locations can support better outcomes for older residents by improving access to essential services and opportunities for social connection. These potential differences have not been addressed or assessed in the application.

Second, over half of the proposed Ōhoka FTAA residential sections are small lots within the range of 425m² to 700m². This is broadly consistent with the development pattern in the main urban areas of the district:²³

- **Rangiora:** average of around 560m² per lot.
- **Kaiapoi:** average of around 450m² per lot.
- **Woodend-Ravenswood-Pegasus:** average of around 500m² per lot.

The application documents (Economics, Real Estate, and Preference Research) do not address or describe the nature of the proposed housing, lot or dwellings, within the context of the market. The assumption applied by the applicant's experts is that the dwellings will be different to supply in the urban area, without giving any evidence to support this outcome.

I consider that if the Ōhoka FTAA was not approved then the households that would be accommodated in these smaller lots would likely find alternatives elsewhere in the Greater Christchurch urban market, such as in Rangiora, Kaiapoi, Woodend-Ravenswood-Pegasus, the edge of Christchurch or within the main towns of Selwyn, given the size of lots proposed.

I see no evidence that supports the contention that these households would choose to buy rural lifestyle lots or large lot residential if Ōhoka FTAA is not developed, as is assumed

²³ Corelogic (2026) New Dwellings 2020-2026.

in the application documents (Economics, Real Estate, and Preference Research).

Third, just under one-third of the proposed Ōhoka FTAA residential lots are medium sized, averaging approximately 800m². While these would be larger than most new lots supplied in the main urban areas of the district, lots of this size continue to be provided in Rangiora, Kaiapoi and the Woodend-Ravenswood-Pegasus area. Since 2020, these urban markets have supplied more than 30 such lots per annum. The proposed product is therefore neither new nor unique.

If the Ōhoka FTAA were developed over ten years, it would supply approximately 27 of these 701m² to 2,000m² lots annually. This would represent a substantial share of the existing urban market for lots of this size provided in Rangiora, Kaiapoi and the Woodend-Ravenswood-Pegasus (i.e. 30 lots per annum provided in the main towns as compared to 27 per annum in Ōhoka FTAA). Therefore most of the associated demand could instead be accommodated within the existing Greater Christchurch urban environment.²⁴ If the proposal were not approved, most households that might purchase these lots would likely select available alternatives elsewhere in that market.

Again, I see no evidence that supports the contention that these households would choose to buy rural lifestyle lots or large lot residential if Ōhoka FTAA is not developed, as is assumed in the application documents (Economics, Real Estate, and Preference Research).

Finally, the Ōhoka FTAA development is proposed to provide 121 larger lots on an average of 0.3ha of land. The proposed lots are generally smaller than the lots within the local area:

- Ōhoka settlement lots are mostly over 0.3ha per lot.
- Mandeville North settlement are mostly over 1ha per lot.
- Rural lifestyle around the edges of the settlement the lots tend to be 4ha or more.

Based on the size of these proposed larger lot Ōhoka FTAA parcels relative to the existing demand in the area, I consider that many of these households may have chosen this location anyway in the absence of the Ōhoka FTAA, and so these households will be a transfer mostly from the two settlements and a small share from wider rural area.

I consider that this aspect is critical to the assessment of the Ōhoka FTAA:

- If the proposed capacity in Ōhoka FTAA is assumed to be a perfect substitute for rural lifestyle lots or large lots in smaller settlements, demand would be redirected from locations in the region that are relatively less accessible. The applicant's assessments largely adopt this assumption and consequently identify positive benefits because Ōhoka FTAA is located closer to the urban environment than most of the rural areas and many of the small settlements.
- If the proposed capacity in Ōhoka FTAA mostly substitutes for housing in the existing Urban Environment, demand would be redirected from more accessible locations. I consider this to be the more likely outcome. As discussed above, at a minimum, the 250 retirement-village units, 490 smaller residential lots and most of the 268 medium-sized lots would likely be accommodated elsewhere, closer to established services, employment, and urban environment. On this basis, the Ōhoka FTAA would be likely to generate negative economic costs because it is less accessible and less efficiently located than most alternative urban locations

²⁴ There is more supplied each year in Rangiora, Kaiapoi and the Woodend-Ravenswood-Pegasus.

within the Christchurch Urban Environment.²⁵

In summary, the nature of the residential activity proposed is fundamental to assessing the development. However, the applicant's assessments provide limited consideration of the supply that would be delivered, how it would fit within the housing market, or the extent to which it would meet identified community needs.

My independent assessment indicates that most of the proposed capacity represents a relatively standard suburban greenfield housing product. In the context of the Urban Environment, most of this supply would be similar to housing already being provided elsewhere, rather than a new or materially differentiated offer.

8.2 Residential demand outlook

Another important consideration is the demand for housing in the existing Ōhoka settlement, for the particular housing products proposed by the Ōhoka FTAA, and across the wider Urban Environment. This is fundamental to determining both the period over which the development could reasonably be completed and the locations from which its demand would be drawn.

Critically, the Economic Benefits Assessment (Appendix 2) provides no assessment of demand for the particular housing proposed by the Ōhoka FTAA. Instead, it assumes that the development will proceed according to the applicant's development plan.

Conversely, the Economic Costs Assessment (Appendix 39) considers a range of potential development scenarios. However, these scenarios are coarse and are not linked to the proposal's scale, housing products, staging or likely rate of market uptake. The assessment also relies on the Real Estate Commentary and Preference Survey to support its assertion that demand for housing specifically in Ōhoka is strong.²⁶ It then assumes, without adequate supporting analysis, that the proposed development is not directly comparable with urban housing in Rangiora and would therefore draw demand principally from nearby rural areas and smaller settlements

First, an important point is that Economic Costs Assessment does not independently assess or test the real-estate commentary or survey methodology. It relies on their conclusions to support both the assumed demand and the source of households, including the assumption that growth would principally be redirected from nearby rural and smaller-settlement areas

As noted above in the review of the Real-Estate Commentary or Preference Research, I have raised serious concerns about the veracity of the findings.

- I consider that the Real Estate Commentary is of limited evidential value because it provides no quantitative data demonstrating high demand for housing in the Ōhoka settlement. At most, it indicates some demand for the existing settlement, it does not establish that demand is high relative to the locations in the district or that there is sufficient demand for the scale, density and housing products proposed by the Ōhoka FTAA.

Indeed, the Economic Costs Assessment acknowledges that projected growth within Mandeville-Ōhoka is insufficient to support the assumed development yield. Its status-quo projections are equivalent to approximately 25 households per annum or 5% of projected district growth. Consequently, the assessment assumes

²⁵ I acknowledge that some demand for the (121) larger lots proposed within the Ōhoka FTAA might otherwise be accommodated through rural-lifestyle subdivisions or in less efficient settlements farther from the Urban Environment. Given the proposed development pathway, this effect is likely to be small (fewer than a dozen lots per annum) and would be substantially outweighed by the effects associated with the remainder of the proposed housing capacity.

²⁶ Page 16, Footnote 24.

that much of the development's demand would need to be redirected from elsewhere.

As the Mandeville-Ōhoka statistical area also includes Mandeville North and surrounding rural-lifestyle areas that will accommodate some of this projected growth, the share available to Ōhoka itself, and particularly to the proposed development, will be materially below 5%.

- The Preference Research contains methodological inconsistencies and errors that materially undermine the reliability and believability of its findings. As noted above, the reported results total 176% for Question 5 and 201% for Question 6, despite each question only allowing a single preferred location. Accordingly, the claim that 21-26% of respondents selected Ōhoka as their first choice is simply not credible and I consider that the applicant's economists should review this material. For this report I have rebased the responses to add to 100%, which results in Ōhoka dropping to around 12% of respondents. That is an attempt to indicate that responses identifying a preference for Ōhoka is overstated, but cannot of itself correct the more fundamental issue with the question that appears to have allowed multiple responses. If only a single response was allowed, Ōhoka may have been much less preferred, although that is not possible to establish.

Furthermore, as discussed above, the survey's restricted choice set, hypothetical framing and omission of material information introduce biases that are likely to overstate effective demand. These issues are well established in housing-preference research. I was the lead author of *The Housing We'd Choose* for Auckland Council, supported by Mr Akehurst (applicant's economist) and Mr Davidson, which expressly addressed the distinction between respondents' unconstrained preferences and the housing they would actually choose when presented with realistic options, prices and household budgets.²⁷ That research demonstrated that wanting a housing option does not necessarily translate into being willing and able to purchase it. Given their involvement in that research and similar subsequent studies, Mr Akehurst and Mr Davidson should have recognised and addressed these methodological limitations in the Ōhoka Preference Research.

Based on my experience in housing-preference research, correcting the survey design to address these biases would be expected to reduce the reported preference for Ōhoka by substantially more than half. In my professional judgement, the proportion of households both willing and able to purchase housing in the proposed development is more likely to be in the order of 2-5% of district demand.

Also, I note that the demand projection adopted in the Economic Costs Assessment also suggests that the share of demand in Ōhoka is likely to be less than 5% of district demand.²⁸

While I do not agree with the reliance on the Real-Estate Commentary or Preference Research within the Economic Cost Assessment Scenarios, it does provide some instructive outcomes which is helpful for understanding the length of time that the development may take to be developed.

²⁷ Yeoman, R and Akehurst, G (2015). *The housing we'd choose: a study of housing preferences, choices and trade offs in Auckland*. Auckland Council technical report, TR2015/016.

²⁸ The Mandeville-Ōhoka statistical area has total of 5% of district demand. This area includes Mandeville North and surrounding rural-lifestyle areas that will accommodate some of this projected growth. Therefore the share available to Ōhoka itself, and particularly to the proposed development, must be materially below 5%.

Second, the Economic Cost Assessment Scenarios assume that 100% of demand in the local Mandeville-Ōhoka area will be diverted to Ōhoka FTAA. Implicitly, this scenario assumes in effect that there is no new growth in Mandeville North, in the rest of Ōhoka settlement, and no new rural lifestyle, which is extremely unlikely in my opinion.

Moreover, the projected demand covers a 17-year period (2026-2043). Accordingly, the development would either:

- Take 17 years to develop, even if it captured 100% of the projected demand, and therefore would not achieve the assumed 10-year development timeframe; or
- Need to capture demand at approximately 170% of the projected annual rate to achieve the ten-year development period assumed in the application.

I consider that neither is feasible, and in reality, the share of growth attracted from the local area would be far less than 100% and the development period would then be longer than 17 years assumed in the Economic Cost Assessment Scenarios and much longer than the 10 years assumed in the Economic Benefits Assessment.

As noted above, I consider that most of the lots in the Ōhoka FTAA are of a nature more similar to urban development than settlement or rural lifestyle. Therefore, the assumption in the scenario of 100% market capture in the local Mandeville-Ōhoka area is not justifiable.

Second, Scenarios 1 and 2 in the Economic Costs Assessment assume that more than half of the growth accommodated by the Ōhoka FTAA would be redirected from nearby rural and small-settlement statistical areas, including Waikuku, Pegasus and Fernside. Much of the projected growth in these areas is likely to reflect demand for rural-lifestyle properties, larger lots or locations adjoining Rangiora, Kaiapoi and Woodend-Ravenswood-Pegasus. These locations generally provide better access to employment, services and the wider urban environment than the Ōhoka site.

While some households may choose to live in the Ōhoka FTAA development instead of these areas, the assumed scale of substitution appears overly optimistic and is unsupported by evidence demonstrating that such a substantial shift in household preferences would occur.

Based on the material presented, I consider it very likely that the Ōhoka FTAA development would:

- Require more than ten years to achieve full uptake, likely taking longer than 17 years as implied by the Economic Costs Assessment scenarios.
- Draw a small proportion of households from nearby settlements and rural-lifestyle areas. This demand would most likely relate to some of the 121 large lots and would therefore involve fewer than 12 households per annum.
- Draw most households from established urban areas, particularly Rangiora, Kaiapoi and Woodend-Ravenswood-Pegasus, as well as parts of Christchurch and the main Selwyn towns. I consider that the vast majority of demand for the 250 retirement units, 490 smaller lots and 268 medium-sized lots would otherwise be accommodated within these urban markets.
- Generate little, if any, additional population or housing growth at the Greater Christchurch or Canterbury regional level. No evidence has been presented demonstrating that the proposal would attract material new growth to the region or even the district. Accordingly, whether or not the proposal proceeds, the number of dwellings constructed and households accommodated across the region is likely to remain broadly unchanged, although a small number of households may be

attracted to Ōhoka from elsewhere in New Zealand.

Third, the Economic Costs Assessment projects district-wide demand of approximately 455 dwellings per annum over the 17 years from 2026 to 2043. Just under half of this growth is allocated to the nearby rural and settlements, while less than half is projected to occur within the three main urban areas of Rangiora, Kaiapoi and Woodend-Ravenswood-Pegasus.

This distribution is inconsistent with observed development patterns. Building-consent data since 2000 show that Rangiora, Kaiapoi and Woodend-Ravenswood-Pegasus have accommodated between 60% and 83% of new dwellings in the district, and most recently 69% during the most recent 12 months. By comparison, the smaller settlements and rural areas within the Greater Christchurch portion of the district have generally accommodated less than one-quarter of new dwellings, including 22% during the most recent 12 months.

This matter is critical because the Economic Costs Assessment allocates a large proportion of future growth to rural and small-settlement areas and then assumes that the Ōhoka FTAA could capture a substantial share of that growth. This supports its conclusion that demand would principally be redirected from less accessible locations, with limited displacement from the existing Urban Environment.

In my opinion, that outcome is inconsistent with the observed evidence, which shows that most district growth is accommodated in the main urban areas. My independent assessment indicates that approximately 77% of future demand may be located in Rangiora, Kaiapoi and Woodend-Ravenswood-Pegasus.

I also consider that the Economic Costs Assessment understates total district demand. My independent projections indicate demand for around 500 dwellings per annum over the medium term and long term. However, the projected growth attributable specifically to Ōhoka remains modest, at less than ten dwellings per annum.

In summary, there is some demand for housing in Ōhoka as a settlement, but the available evidence does not establish sufficient location-specific demand to support the scale or assumed ten-year delivery of the proposed development. The Economic Costs Assessment itself recognises that much of the required demand would be drawn from within the district and must be transferred from elsewhere. The proposal would therefore primarily redistribute housing development and households within the Christchurch Urban Environment, rather than materially increase regional housing supply or population growth.

The key point of difference between the economists is whether demand will be drawn from low growth rural areas or from high growth urban areas. The finding on this aspect will fundamentally impact the assessment of benefits and costs.

8.3 Housing supply outlook

The supply of housing and development opportunities within the local area, Waimakariri's main towns and the wider Urban Environment is also important. The Economic Benefits Assessment claims that additional land supplied by the Ōhoka FTAA would improve competition and reduce monopolistic outcomes. However, it provides no evidence of market concentration, market power or non-competitive behaviour in the district's residential land and housing markets.

First, I note that the DPR live-zoned a large amount of new greenfield land for development and much of this land is still undeveloped. Also, the intensification variation that was also adopted recently has increased the development potential for redevelopment and infill within the existing urban areas of the district by a large amount. This is estimated by the

Council in 2025 to be in the range of 14,000 to 17,000 dwellings, and is more than sufficient to meet the demand over the coming medium and long term.²⁹ There are also several unresolved appeals seeking to rezone rural land as either Large Lot Residential Zone³⁰ or other residential zones. If successful, these appeals would provide further residential development capacity.

To provide an independent estimate, I have reviewed the DPR changes and the increase in development activity within the greenfield and brownfield areas of the Rangiora, Kaiapoi and Woodend-Ravenswood-Pegasus. Based on my independent review of the currently available data, I consider that development capacity is likely to be towards the higher end of the range in than WDC's 2025 estimate and approximately 16,000 dwellings. This would provide ample supply to accommodate projected demand over both the medium and long term.

However, I acknowledge that additional capacity may be appropriate in some smaller settlements to meet demonstrated location-specific demand. The DPR provides some additional development opportunities in Ōhoka, however this must be considered against the similarly modest demand for housing in that location. Any local shortfall would be small in the district context and would not represent significant development capacity at the regional or national scale for the purposes of the FTAA.

I also note that Christchurch City Council and Selwyn District Council have adopted changes to their planning frameworks that materially increase development capacity relative to the previous provisions. Across the Christchurch Urban Environment, medium-term commercially feasible and reasonably expected-to-be-realised capacity exceeds 96,000 dwellings³¹, compared with demand plus the competitiveness margin of approximately 31,500 dwellings.³² Capacity is therefore more than three times projected demand, producing a surplus equivalent to over 200% of expected demand.

This provides substantial opportunities for competing developers and is inconsistent with the Economic Benefits Assessment's unsupported suggestion that individual developers could exercise market power or that monopolistic outcomes are likely.

Second, the Ministry of Housing and Urban Development³³ dashboard provides a housing efficiency metric called Price-Cost Ratio which is intended to provide councils with an understanding of when there may be constraints in the residential market.³⁴ The New Zealand Treasury notes that a Price-Cost Ratio in the range of approximately 1 to 1.5 is associated with markets where the supply of land and development opportunities is relatively responsive to demand.³⁵ Conversely, a Price-Cost Ratio of more than 1.5 can indicate a tight market with capacity constraints, where there is insufficient supply of residential land.

In this context, Figure 1 below shows the Price-Cost Ratio from the urban land dashboard for Waimakariri and Greater Christchurch, which indicates:

- That the ratios for Waimakariri have been within the responsive market range for

²⁹ Waimakariri District Council (2025) Waimakariri Finalises Proposed District Plan (24th June)

³⁰ Particularly appeals around Mandeville North and, to a lesser extent around Woodend.

³¹ Commercial Feasible and Reasonable Realisable.

³² Greater Christchurch Partnership (2026) Greater Christchurch Housing Development Capacity Assessment.

³³ Now part of Ministry for Cities, Environment, Regions & Transport.

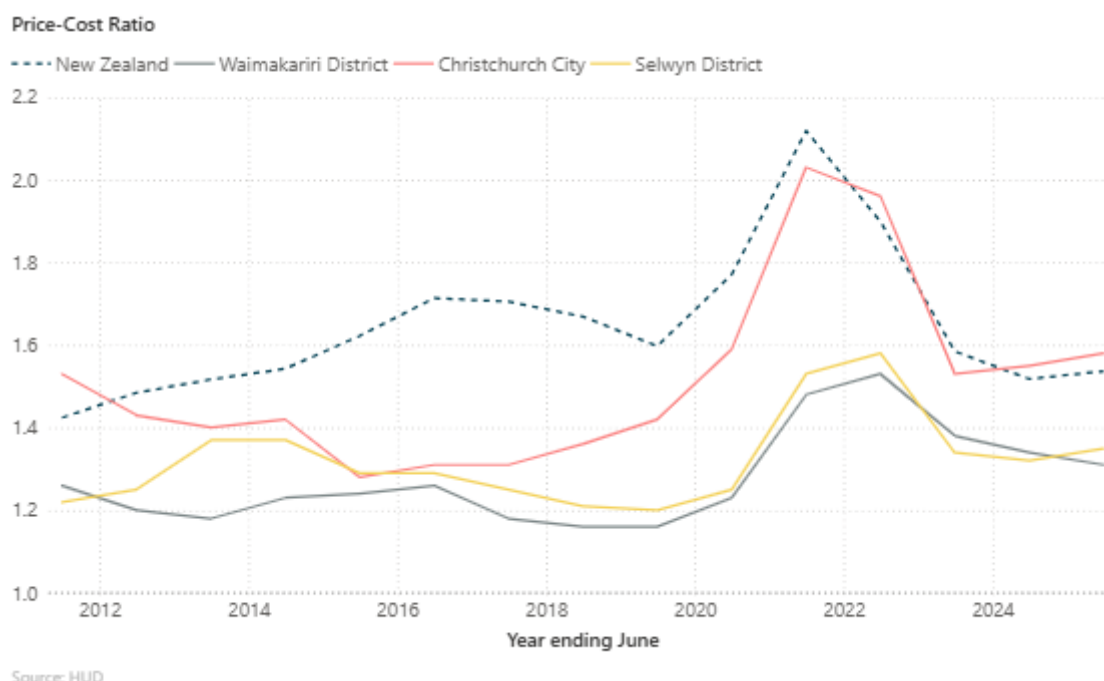
³⁴ When there is enough supply of sections to meet demand, land should be a minor component of the cost of a home. The price of a home should mostly reflect the cost to build it. Construction and land prices might both increase commensurately with growth in demand. But when there is a shortage of sections for some reason, land prices can push house prices far beyond construction costs. So the gap between house prices and construction costs (the price-cost ratio) is used as an indicator of the flexibility of land markets to accommodate new homes.

³⁵ Treasury (2024) Analysis of availability of land supply in Auckland results from improved land efficiency indicators and discussion on their use for policy.

the last 15 years. This suggests that the observed price signals do not indicate a structurally constrained market or a fundamental lack of responsive land supply in either Waimakariri or wider Greater Christchurch. If material market power or monopolistic outcomes existed, one would expect Price-Cost Ratio to be increasing in Waimakariri.

- The ratios for Waimakariri have, for the most part, been consistently lower than those for Greater Christchurch and New Zealand, which suggests that the supply of development capacity in Waimakariri, relative to demand, has been comparatively more responsive than in the wider Greater Christchurch area and New Zealand. Also there has been an improvement since 2021, with Price-Cost Ratio dropping.
- This is unsurprising, as both Greater Christchurch and Waimakariri in particular, have enabled large areas of development, both in terms of greenfield opportunities and brownfield intensification options. Clearly the data does not indicate the existence of a tightly held or constrained housing market in Waimakariri or Greater Christchurch.

Figure 1: MHUD Urban Development Dashboard - price-cost ratio



The Economic Benefits Assessment makes unsubstantiated claims about housing supply, market power and competitive outcomes, which are then relied upon to support its assessment of the economic benefits of the Ōhoka FTAA. In my opinion, no evidence has been presented to support those claims. The available evidence instead indicates that the residential market is competitive, has substantial development capacity and is operating efficiently.

8.4 Economic Benefits

Within the market context and the nature of the Ōhoka FTAA, the scale of the one-off construction benefits and ongoing economic activity that can reasonably be attributed to the proposal will be a subset of what was presented in the Economic Benefits Assessment.

For the purposes of this independent assessment, I have adopted the gross development and ongoing activity estimates presented in the Economic Benefits Assessment: total

construction expenditure of \$801.5m and annual Local Centre turnover of \$65m at full occupation. There is insufficient supporting information provided to allow an independent verification or interrogation of these estimates. While I have adopted those estimates for indicative purposes, that does not mean that they are robust estimates, and I retain concerns about that robustness.

First, assessing the scale of construction activity generated in each year requires a realistic development timeframe. The expenditure arising in each year must then be discounted to present-value terms to estimate the value of the construction activity in comparable 2026 values.

For this assessment, I have adopted a 17-year development period, broadly corresponding with the 2026-2043 growth horizon used in the Economic Costs Assessment.³⁶ Assuming full completion within 17 years is, however, overly optimistic as it requires a large share of the local demand to be captured by Ōhoka FTAA. In my opinion, the development would probably capture a smaller share of available demand and take longer than 17 years to complete.

I have nevertheless assumed that: all development stages commence within the first ten years and are completed within 17 years; civil works are spread evenly across the first ten years (2027-2036); the commercial centre is constructed in 2028; and the remaining construction expenditure is spread evenly across the full 17-year period 2027-2043. This pathway provides for an average of approximately 66 units per annum³⁷, equivalent to around 13% of projected district demand.

Extending the development period reduces the construction activity occurring in any individual year. The ten-year period adopted in the Economic Benefits Assessment produces average expenditure of approximately \$80m per annum. This compares with approximately \$47m per annum when the same total expenditure is spread across the more realistic (although still optimistic) 17-year development period.

I have converted the projected construction activity into present-value terms which is a standard method adopted by economists. This is consistent with the approach adopted in the Economic Costs Assessment for valuing the loss of rural production, which applies a commercial discount rate of 8%. Moreover, I note that the authors of the Economic Benefits Assessment have applied this present-value methodology in other FTAA assessments that I have reviewed.

I consider that a present-value methodology is appropriate and for consistency, the same treatment of timing should be applied to both the proposal's economic costs and its claimed benefits.

Applying the commercial discount rate to the assumed development pathway produces an average annual present-value equivalent of approximately \$26.5m. This is substantially below the undiscounted average of approximately \$80m per annum presented in the Economic Benefits Assessment. That result demonstrates the importance of development timing: applying a realistic delivery period and consistently accounting for the timing of activity reduces the average annual value by approximately **two-thirds**.

This will then feed directly into a material reduction in the GDP, the report GDP impact of \$40m per annum would reduce by two-thirds to around \$13m per annum.

Second, the GDP and employment impacts estimated in the Economic Benefits

³⁶ Noting that the scenarios models uptake of only 850-960 households by 2043, compared with the proposal's total capacity of 1,129.

³⁷ Including the residential lots and the retirement units, which is 1,129 units divided by 17 years equals 66 units.

Assessments are gross values which does not take into account that much of this activity would occur in other locations anyway. As noted in the Economic Costs Assessment it is not “likely or realistic” to assume that growth accommodated in Ōhoka FTAA would be new to the district.

Logically this also applies to the region, whereby the:

- housing demand would be accommodated elsewhere if Ōhoka FTAA was not developed and the economic value is simply a transfer from these locations which are also within the region, and
- housing supply is limited by the construction market capacity and development of Ōhoka FTAA will simply divert resources (builders, plumbers, earthmovers, etc) from other projects.

The net outcome is that most of the gross GDP and employment economic value is not new to either the district or region. This issue has been raised in other FTAA applications which involve greenfield developments.

For example, in the Sunfield FTAA in Auckland the Panel requested further analysis of both demand and supply side displacement³⁸:

- Housing that would otherwise have been delivered elsewhere, reflecting the finite number of households requiring dwellings and that the development would not materially affect migration or demographic outcomes.
- Construction-sector constraints, as workers and other resources used to deliver the FTAA development are limited and would otherwise be employed on alternative developments.

In response the applicant’s economists concluded that under the main scenario most of the development would represent transferred activity, with approximately one-quarter being net additional.³⁹

I note that the Sunfield FTAA is located in Auckland, where the housing supply-and-demand balance is much tighter than in Waimakariri. Transfer and displacement effects for that development would therefore be expected to be smaller than for the Ōhoka FTAA.

Accordingly, I consider that considerably less than one-quarter of the Ōhoka FTAA’s activity would be net additional to either the district or the region. Importantly, Waimakariri has substantial development capacity relative to projected demand and a highly competitive development market. I therefore expect that 90-95% of the gross construction activity would occur elsewhere in the district or region if the proposal did not proceed, leaving only 5-10% as net additional.

Applying this 5-10% net-additional share to the revised annual GDP estimate of approximately \$13m produces a one-off net regional GDP benefit of only \$0.7-\$1.3m per annum during construction. At this scale, the proposal would make no meaningful difference to economic activity at either the district or regional level.

I note that the Economic Costs Assessment considers the loss of rural productive activity of approximately \$0.7m in regional GDP per annum to be insignificant. Therefore, applying the same standard consistently, the construction benefits attributable to the Ōhoka FTAA must also be regarded as insignificant.

I acknowledge, however, that its local effects would be substantial because it would

³⁸ Minute 22 18 December 2025, Further Information - Economics and National Direction Legal submissions Sunfield [FTAA-2503-1039].

³⁹ Property Economics 28 January 2026, Economic Memorandum Re Minute 22 of Expert Panel.

transform Ōhoka from a small rural settlement into an urban area.

Finally, once fully developed and occupied, the new Ōhoka Local Centre is estimated to have a turnover of \$65m and generate approximately \$24m in annual GDP, supporting 462 jobs. However, the Economic Benefits Assessment provides no analysis of demand for the proposed commercial floorspace, its likely development rate or when the centre could reasonably be expected to achieve full occupancy. Although the Economic Costs Assessment considers the centre's potential effects on existing centres, it similarly does not assess whether or when the proposed floorspace would be commercially viable and occupied.

The proposed new Local Centre is large relative to both the Ōhoka FTAA development and the existing Ōhoka population. Commercial development within a new greenfield area will generally follow growth in its customer catchment, with businesses establishing only once sufficient demand exists to support viable operation.

Accordingly, the centre is likely to be developed progressively and may not become fully occupied until late in the residential development period, if at all. The application's full-occupancy economic estimates therefore provide no reliable indication of the timing or annual scale of the benefits likely to occur.

Furthermore, as with the one-off construction effects, the ongoing local centre benefits are also reported in gross terms and do not account for transfer or displacement effects. As shown in the Economic Cost Assessment, most of the demand captured by the new centre would otherwise occur at existing centres in Rangiora, Kaiapoi, Mandeville North, Ravenswood and elsewhere in the district.

I consider that only expenditure generated by households genuinely attracted to the region by the Ōhoka FTAA should be treated as net additional. Applying the estimated 5-10% net-additional share to the \$29m of household expenditure identified in the Economic Benefits Assessment produces approximately \$1.5-\$2.9m of additional annual demand. This represents only around 2-5% of the \$65m required to support the proposed Local Centre. Most of its ongoing turnover, GDP and employment would therefore be transferred from existing locations rather than attributable to the development.

I estimate that the net additional ongoing benefit would be approximately \$0.5-\$1.1m in GDP per annum at full occupancy. As sufficient demand to support full occupancy is unlikely to arise for many years, the present value of these delayed benefits would be smaller again. Regardless of the timing of the full occupancy, at this small scale the proposal would make no meaningful difference to economic activity at either the district or regional level.

I acknowledge that the new Local Centre effects would be substantial in the local area, because it would transform Ōhoka from a small settlement with a single service station into a centre containing potentially dozens of retail and service businesses, albeit only once sufficient demand existed to support them. Also, as estimated in the Economic Cost Assessment, it will cause a large loss of activity in the Mandeville North Centre.

8.5 Wider Economic Effects

The broader economic benefits and costs associated with the proposal, including its contribution to a well-functioning urban environment, affordability-competitiveness, infrastructure efficiency and other externalities. Also the scale, nature and economic efficiency of the proposed local commercial centre.

8.5.1 Well Functioning Urban Environments

Fundamentally urban environments are powerful generators of wellbeing for the communities that live within them. Much of the social and economic activity that occurs in New Zealand is generated within urban environments. The performance of these areas is critically important to the overall wellbeing of most of the population in the country, which is also true for Waimakariri and Canterbury.

New Zealand's urban environments together occupy only a very small proportion of the country's land area, but have an intensity of activity that generates both positive and negative outcomes for the community. Broadly, planning within an urban environment seeks to allow the positive aspects to occur while limiting the negative outcomes.

Within Greater Christchurch the urban environment includes the urban zoned area of Christchurch City and the satellite townships in Waimakariri and Selwyn. Importantly for Ōhoka FTAA, the townships of Rangiora, Kaiapoi, and Woodend/Ravenswood/Pegasus are part of the Christchurch urban environment, however the small rural settlements (including Ōhoka) have been excluded.⁴⁰

This definition reflects the well establish planning framework which has focused urban growth in and around the existing urban boundaries, which is an orderly and efficient development pattern that minimises the costs of accommodating new households and maximising the benefits associated with locating close to key activity centres.

However, I acknowledge that there is some ambiguity in the NPS-UD definition of an "urban environment". It is therefore arguable whether some of Waimakariri's smaller settlements form part of the wider urban environment, as contended by the applicant.

I consider on balance, that Ōhoka and Mandeville, and by extension the Ōhoka FTAA area, are not currently part of the Greater Christchurch urban environment, however the criteria for establishing this from an economic perspective means that it is difficult to form a definitive opinion.

Four factors suggest that those settlements could be part of the urban environment. First, they are both located in close proximity to other parts of the urban environment which means that they are closely linked to the urban environments. Second, many of the residents that live within Ōhoka would travel to work within Rangiora, Kaiapoi, or Christchurch. Third the housing market within Ōhoka and Mandeville will be closely linked to the housing market in Greater Christchurch urban environment. Fourth, Ōhoka has been treated as part of the urban area within previous planning frameworks, local and regional.

However, four factors suggest that these settlements should not be considered to be part of the urban environment. First, both Ōhoka and Mandeville have very small populations being well below the urban environment threshold of 10,000 people in the NPSUD. Second, the land uses within the settlements are predominantly semi-rural and not urban in character as required in the NPSUD, which suggests that these settlements are not part of the urban environment. Third, looking at other Tier 1 councils I see that similar (as to size and proximity to the urban edge) settlements have not been defined as being part of the urban environment (e.g. Coatesville and Whitford, in Auckland). In some instances, there are larger and more proximate settlements in other Tier 1 areas that have not been included within the urban environment. Fourth the decision by the council to exclude Ōhoka and Mandeville from Variation 1 shows that these areas should not be considered as being part of the urban environment.

⁴⁰ Greater Christchurch Partnership (2026) Greater Christchurch Housing Development Capacity Assessment.

Regardless of whether Ōhoka and Mandeville, and by extension the Ōhoka FTAA area, are part of the urban environment there is also a key requirement that Ōhoka FTAA needs to contribute to well-functioning urban environment.

I consider that the residential, commercial, and other wider implications components of Ōhoka FTAA suggests that some aspects of the proposal would not contribute to a well-functioning urban environment. First, the commercial centre(s) as proposed are much larger than would be required for the local needs of the community, which would likely result in negative impacts on the rest of the urban environment. Second, in terms of residential supply, I consider that there is no evidence that the development will any material impact on competition, prices, and affordability. Third, there are wider costs associated with the development which will impact the efficient operation of the urban environment, which includes potential for cross subsidises for infrastructure, additional transport costs and loss of highly productive soils. The area is not close to main commercial or employment opportunities, nor is it well serviced by public transport, and the demand for housing is relatively low compared to the other main towns in the District. For those reasons, I consider that Ōhoka FTAA does not contribute to well-functioning urban environment.

8.5.2 Improving housing affordability and competitive markets

The Economic Benefits Assessment claims that the Ōhoka FTAA would improve housing affordability and market competition. However, it provides no information on the anticipated selling prices of the proposed dwellings, no commitment to deliver affordable housing, and no analysis demonstrating how the proposal would improve affordability.

Instead, it relies on the theoretical proposition that additional development capacity increases competition which causes a reduction in prices and improvement in affordability. The Assessment also presents historic house-price growth in Waimakariri as evidence of declining affordability, but rising prices do not, by themselves, demonstrate insufficient competition or market power. Presenting house-price trends for Waimakariri in isolation creates a misleading impression because it provides no comparison with broader regional or national trends and does not establish that local price movements result from insufficient supply or weak competition.

First, as outlined above, there is no evidence that Waimakariri's residential development market is uncompetitive. The District contains numerous developers and substantial enabled and feasible capacity, providing ample opportunity for continuing competition. The MHUD data shown in this report shows that development in Waimakariri is competitive, and in fact more competitive than most urban areas in New Zealand. Against this evidence, the Economic Benefits Assessment's hypothetical suggestion that developers may exercise monopolistic market power is unsupported and implausible.

Second, nominal house prices alone are not a sufficient measure of housing affordability. Affordability is also influenced by household incomes and mortgage interest rates, which affect both purchasing power and debt-servicing costs. Incomes have increased over the period considered, while mortgage rates have declined from their recent peaks. These factors indicate that housing is more affordable today than a comparison of nominal house prices alone would suggest.

Figure 2 below presents inflation-adjusted dwelling prices for Waimakariri District and New Zealand's major urban environments. While real house prices are not a complete measure of affordability, they provide a more meaningful comparison than nominal prices used in the Economic Benefits Assessment.

The figure shows that real dwelling prices across the urban environments have declined

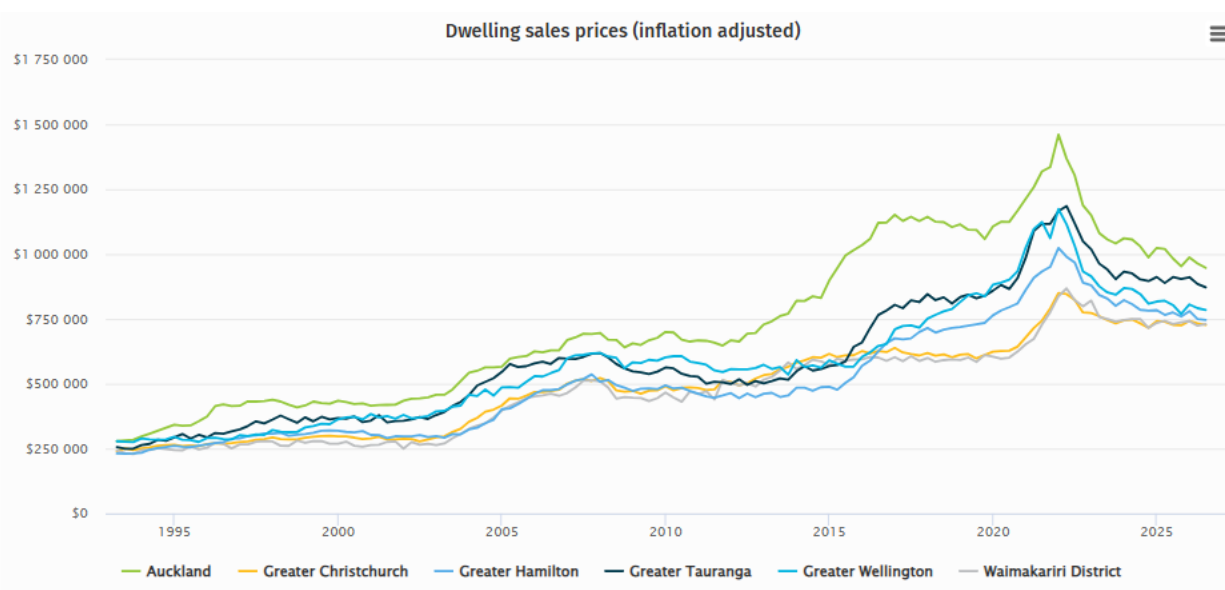
materially from their 2021-2022 peaks. This decline, together with income growth and the reduction in interest rates since 2024, has improved housing affordability

The following trends are relevant when assessing the potential effect of the Ōhoka FTAA on affordability:

- Over the past 30 years, Greater Christchurch has consistently recorded lower dwelling prices than the other major urban environments and has remained among New Zealand's most affordable major urban housing markets.
- Although price levels differ, the urban environments generally exhibit similar cycles, with peaks and troughs occurring at broadly comparable times. This indicates that a substantial part of house-price movement reflects national macroeconomic conditions, including interest rates, credit conditions and construction-cost inflation, rather than local land supply or competition alone.
- Dwelling prices peaked around 2021-2022 and have subsequently declined or remained broadly stable. Overall, housing in Greater Christchurch and Waimakariri has become relatively more affordable, and the available data does not indicate a tightly constrained or uncompetitive housing market.

Accordingly, the Economic Benefits Assessment does not demonstrate that the Ōhoka FTAA will notably improve affordability. Nor does it isolate the proposal's potential effect from the much larger influence of income growth, interest rates, construction costs and wider housing-market conditions.

Figure 2: MHUD Urban Development Dashboard - Dwelling Sales Prices for Large Urban Environments



Third, while the Economic Benefits Assessment does not provide an estimate of the price points that will be achieved in Ōhoka FTAA it does estimate construction costs as input to the assessment of one-off construction benefits. The implication is that:

- Small lots have a dwelling with a construction value of \$560,000.⁴¹
- Large lots have a dwelling with a construction value of \$1,500,000.⁴²
- Retirement units have cost of \$304,000 per unit.⁴³

⁴¹ Average construction costs \$3,100 per m² and dwelling size 180m²

⁴² Average construction costs \$6,000 per m² and dwelling size 250m²

⁴³ \$76m of construction divided by 250 units.

This means that on average the build cost alone is \$600,000 per dwelling, which is not far below the current median sale price in Waimakariri (\$721,500).⁴⁴ Combining any sensible price for the lots (i.e. the land value) with Economic Benefits Assessment's average construction costs will result in a final sales price that is much higher than the existing median, and hence less affordable.

The implication is that either:

- to be more affordable than the current market the applicant has to sell the lots for less than \$120,000 each to be below the median sale price (i.e. build cost of \$600,000 plus \$120,000 for the land to be lower than the median price); or
- Ōhoka FTAA will be less affordable than the current market. As an example, if the applicant sells each lot for \$200,000 and build costs of \$600,000 are applied, then each dwelling needs to sell for \$800,000. In this case, Ōhoka FTAA would be 10% less affordable than the current market; or
- Economic Benefits Assessment's assumed average build costs or dwelling sizes are incorrect. As an example, if the applicant sells each lot for \$200,000 and smaller dwelling/build costs of \$500,000 are applied then each dwelling needs to sell for \$700,000. In this case, Ōhoka FTAA would be 3% more affordable than the current market.

These implicit price points suggest that housing within the Ōhoka FTAA would generally be less affordable than housing in the existing Waimakariri market. However I acknowledge that some houses may be cheaper than housing options in Ōhoka-Mandeville or parts of the wider Christchurch Urban Environment. There is therefore a clear disconnect between the claimed affordability benefit and the housing products likely to be delivered.

Indicatively, I have reviewed vacant residential land prices achieved within Waimakariri over the past two years.⁴⁵ In my opinion, the following outcomes are likely for the residential proposed in Ōhoka FTAA:

- **Small lots:** the land prices of each lot range between \$250,000-\$350,000 and construction costs of around \$500,000-\$600,000 indicate completed dwelling prices of approximately \$750,000-\$950,000.
- **Medium lots:** the land prices of each lot range between \$350,000-\$500,000 and construction costs of around \$500,000-\$600,000 indicate completed dwelling prices of approximately \$850,000-\$1.1 million.
- **Large lots:** the land prices are likely to exceed \$500,000. Given the size and character of dwellings constructed, completed properties could sell for \$2 million or more.
- **Retirement units:** These are more difficult to price because the applicant has provided limited information about their size, form, tenure and services. Based on prices at existing retirement villages in Waimakariri, entry prices may begin at approximately \$600,000 per unit. However, most retirement-village units are supplied under licences to occupy and may incur deferred management and ongoing fees, meaning their affordability cannot be assessed from the entry price alone.

I consider that at best, a small number of dwellings on the smallest lots might be priced below the District's median dwelling price. Some retirement units may also have comparatively lower entry prices. However, the application contains no affordable-housing

⁴⁴ MHUD (2026) Urban Dashboard - Median Price Series (Actual) June 2026.

⁴⁵ Quotable Value (2026) Vacant Residential Lot Prices.

requirement, price commitment or delivery mechanism.

I therefore consider that there is no demonstrated basis for concluding that the Ōhoka FTAA would deliver affordable housing or materially improve housing affordability within the District.

8.5.3 Infrastructure Efficiency

The urbanisation of the Site will require new infrastructure to be developed in the district, both within the Site itself (which will be funded by the applicant) and outside of the Site (which will be funded via Council and Government).

The applicant and households that live on the Site will cover some of the costs of the wider infrastructure via development contributions, rates, and funding agreements. The extent to which these payments cover the required infrastructure will be important. If the payments that are collected are less than the costs of the infrastructure then the rest of the community will bear the cost. There is potential for a cross subsidy from the rest of the community to the developer of Ōhoka FTAA and the residents that would live within the Site.

For example, I consider that it is likely that the Development Contribution policy was set by Council based on the orderly and efficient development of land on the boundary of the existing main urban areas. For the most part the development of land close to existing urban areas will require less council infrastructure which would be less costly and more efficient relative to the development of other new locations. This would have allowed Council to strike a lower development contribution fee than it would have had development further away been included as part of the future environment.

It may also be that the development of Ōhoka FTAA could generate the need for more council infrastructure than what was anticipated. In that case the development contributions collected from the Site would not be sufficient to meet the full costs which means that the rest of the community would be required to cross subsidise the development of the Site.

For example, WDC borrows or applies ratepayer funds to provide infrastructure for planned greenfield growth areas. Development contributions are subsequently set and collected on the assumption that growth will occur broadly in accordance with the Council's planned sequencing.

An out-of-sequence development, such as Ōhoka FTAA, can divert growth, therefore reducing development contribution revenue from planned growth areas, leaving planned infrastructure underutilised and the associated debt outstanding for longer. This increases financing and holding costs and reduces the overall efficiency of infrastructure provision. To the extent that these additional costs cannot be recovered from the out-of-sequence development, they will ultimately fall on existing ratepayers.

This issue has been raised by many councils and acknowledged by the Government. The Government has recently progressed changes to FTAA intended to allow councils to recover growth-related network costs arising from greenfield fast-track projects, while its proposed development-levy regime is intended to provide a more comprehensive "growth pays for growth" system. However, the legislative change was announced only recently and passed into law on 18 September 2026. It may enable the Council to recover from the applicant a greater share of the growth-related infrastructure costs attributable to the proposal. The implications of this change, including the costs potentially recoverable and any residual costs falling on ratepayers, should be addressed in the applicant's assessments.

The importance of infrastructure and the extent to which Ōhoka FTAA will or will not provide sufficient funds to meet the infrastructure needs should be addressed by other experts, however, I consider that it is an important issue which could generate externalities that have not been addressed in the economic assessment submitted by the applicant.

This issue is not insignificant or minor. As an example, I note that Auckland Council has recently considered the infrastructure and funding implications of unanticipated greenfield developments, including developments proceeding through the FTAA.⁴⁶ Auckland Council has identified a pipeline of approximately 50,000-60,000 dwellings outside its existing planning framework and estimates that these developments could require around \$3bn of additional council capital expenditure.

Auckland Council is investigating options to recover more of these costs from developers and future residents, as well as potentially reducing or deprioritising council services within unanticipated development areas. This provides a useful illustration of the infrastructure-funding risks that rise when development occurs outside planned and funded growth sequences and the issue associated with new greenfield approved via FTAA.

There is no equivalent infrastructure-cost estimate available for Waimakariri. However, Auckland Council's assessment equates to approximately \$50,000-\$60,000 of additional council capital expenditure per dwelling. If the infrastructure cost associated with the Ōhoka FTAA were conservatively assumed to be half the lower end of that range (\$25,000 per dwelling) this would generate a cost of approximately \$28m.

This is an indicative comparison rather than a detailed project-specific estimate. Nevertheless, it demonstrates that the infrastructure consequences could reasonably amount to tens of millions of dollars.⁴⁷ Unless these costs are quantified and fully addressed through conditions or funding agreements, there is a material risk that the wider community would cross-subsidise the development. This could place upward pressure on rates or require other planned infrastructure and services to be deferred, reduced or reprioritised.

8.5.4 Transport Costs

The Ōhoka FTAA would enable a large number of households to live in a new urban development within a predominantly rural setting. Most residents would remain dependent on private motor vehicles to meet their daily needs, and their journeys would generally be longer than those made by comparable households living within the established urban areas of Waimakariri or Greater Christchurch.

As discussed above, I consider that most households accommodated by the proposal would otherwise live in urban locations such as Rangiora, Kaiapoi, Woodend-Ravenswood-Pegasus or elsewhere in the Christchurch Urban Environment. These locations provide substantially better access to employment, education, healthcare, retail, personal services and community, social, sporting and religious activities. While the proposed Local Centre would meet some local needs, it would not provide the breadth of services and opportunities available in the established urban areas.

Therefore, the residents of the Ōhoka FTAA would necessarily need to travel further for work, education, healthcare, shopping and community activities than they would under the likely urban counterfactual. Given the site's location within the Greater Christchurch urban

⁴⁶ Auckland Council (2026) Policy, Planning and Development Committee - Meeting 8 September.

⁴⁷ I understand that the Council is addressing flood risk in the Mandeville-Ōhoka area and is investing approximately \$24m in stormwater infrastructure. It illustrates the potential scale of infrastructure costs that can arise when growth occurs in locations where existing network capacity is insufficient. Unless these costs are fully recovered from the development generating the additional demand, they may ultimately fall on the wider community.

network, the additional distance may amount to only several kilometres for an individual journey. However, when applied across approximately daily vehicle movements and accumulated over the life of the development, the resulting increase in vehicle kilometres travelled is likely to be substantial.

The Transport Assessment (Appendix 15) provided suggests that the households that live within the area will generate 6,046 vehicle movements per day, equivalent to approximately 2.2 million vehicle movements per annum. This estimate excludes traffic generated by the proposed Local Centre and polo grounds.

In combination the total additional travel over the course of a year and across all the households within Ōhoka FTAA would be considerable. This additional travel would generate additional costs which would include travel costs (fuel, time, etc), emissions (CO₂, noise, etc), safety (injury, death, etc), and additional congestion. The transport assessment did not cover the additional travel distance, or the additional travel costs or emissions.

I note that NZTA - Waka Kotahi provides a standard cost and benefits manual which is commonly used by transport experts to quantify the externalities associated with the transport network.⁴⁸ This includes values for pollution, CO₂, congestion, injury, death, noise, time cost, fuel, etc, which could be applied to quantify the scale of these externality costs.

I note that the authors of the Economic Benefits Assessment have applied these methods when assessing transport effects for other FTAA proposals that I have reviewed. It would therefore be both appropriate and consistent for economists to quantify these costs in the assessment of the Ōhoka FTAA.

Indicatively, if the 2.2 million trips identified in the Transport Assessment were each only 1 kilometre longer, that would be a cost of around \$2.6m per annum of direct vehicle costs⁴⁹ and travel time cost⁵⁰. The assessment by Beca for transport outcomes suggests that additional direct vehicle costs could be in the order of \$2.7m per annum.

Furthermore, including the other externality costs (pollution, CO₂, congestion, injury, death, noise) would increase this value even further.

I provided this indicative assessment to show that even small difference in travel patterns can increase total annual travel costs substantially. A more detailed assessment by transport experts could more accurately quantify these externalities.

8.5.5 Inefficient Commercial Centre

The core issue of contention is that the proposed 1.5ha of LCZ commercial land is substantially greater than is required to meet the needs of the local community. No evidence has been provided regarding the demand for, or commercial viability of, development at this scale

By comparison, the Mandeville Village centre as original zoned occupied approximately 0.6ha and accommodates a supermarket, petrol station, childcare facility, bakery, bar, fish and chips, Indian restaurant and Thai takeaway, and associated parking. The Mandeville Village centre serves both local residents and the surrounding rural catchment and therefore provides a useful indication of the scale of commercial activity that could

⁴⁸ NZTA (2026) Monetised Benefits and Costs Manual.

⁴⁹ Vehicle operating costs: multiply 4.4 million vehicle-kilometres by an illustrative rate of \$0.40/km produces \$1.8m annually.

⁵⁰ Time value: at an assumed average speed of 50 km/h, each trip takes an additional 2.4 minutes. This equals 88,000 additional vehicle-hours annually. Applying the NZTA composite value of travel time of \$38 per vehicle-hour gives an annual time cost of approximately \$3.4m annually.

reasonably be expected at Ōhoka FTAA.

A further 0.6ha of land was zoned for commercial activities through the DPR, and resource consent was granted in 2022 which showed that the development planned to provide for approximately 808m² of commercial floorspace. Although a car park has been formed, the proposed buildings have not been constructed and the site remains largely vacant. The absence of development over the past four years indicates that demand in the area is currently limited, although I would expect this existing capacity to be taken up over time as demand grows.

However, if the Ōhoka FTAA proceeds with its proposed large Local Centre Zone, it would divert demand from this existing centre and cause the land to remain undeveloped for longer. This duplication of commercial capacity would represent an inefficient use of zoned land.

Moreover, the application does not demonstrate why this large area of commercial land area is required at the Ōhoka FTAA. Land is a valuable resource and should not be unnecessarily committed to an activity for which there is no demonstrated demand or viable development pathway.

I agree that the competitive effects on most other centres in Waimakariri are unlikely to be significant and that Mandeville Village is the only centre expected to experience material adverse effects (a reduction in activity of approximately 24-33%, according to the Economic Costs Assessment). However, the absence of significant effects on other centres is not sufficient to establish that providing 1.5ha of Local Centre land at Ōhoka is necessary, viable or economically efficient.

Indicatively, based on the number of dwellings suggested in Ōhoka FTAA and the normal rate of commercial supply in a local centre⁵¹ that the amount of retail floorspace sustainable from the proposed development would be around 1,400m² GFA. Allowing for some commercial services, daycare, and medical would suggest a floorspace of up to 3,000m² at most.

Neither of the economic assessments provided with the application examines the demand for, or commercial viability of, the proposed commercial and healthcare services. As an example, Te Whatu Ora data indicates that there is generally around one GP per 1,500 residents. On that basis, the development might support only one or two GPs, and only if a high proportion of residents transferred to the new practice, which is unlikely. A clinic of this scale would likely require approximately 100m² GFA, equivalent to only 1% of the proposed commercial floorspace. There may also be demand for a single dentist and a small shared allied-health practice accommodating activities such as physiotherapy. A standalone pharmacy is less certain, as they require much larger populations. The proposed population would not be sufficient to support separate permanent tenancies for services such as optometry, chiropractic, osteopathy, podiatry, midwifery, etc. Overall, I consider that approximately 400-600m² GFA could reasonably be required for locally supported healthcare activities, equivalent to only 4-6% of the proposed 9,390m² commercial GFA.

Given the location and available demand, it is difficult to imagine sufficient activities capable of supporting the full development of the proposed LCZ. The Economic Assessments from the applicant simply assume that enabling or constructing the floorspace will result in viable businesses, without assessing the demand, likely uptake or

⁵¹ Formative's retail demand model analysis of urban environments across New Zealand shows that local centres typically capture approximately 10-15% of household retail expenditure, with the balance directed to larger centres such as CBDs, key activity centres, town and suburban centres, and large-format retail centres. This level of expenditure supports approximately 1.0-1.2 m² of local-centre GFA per household.

timeframe required to support them.

For the proposed centre to be commercially viable at the scale enabled, it would need to attract substantial expenditure from outside the local community. The potential 9,400m² of GFA enabled by the proposed 1.5ha Local Centre Zone is approximately three times the floorspace required to meet locally generated demand.

If a centre of the scale proposed is enabled within the Ōhoka FTAA, I consider the following outcomes likely:

- A substantial proportion of the commercial land would remain undeveloped for many years, with full uptake unlikely until well beyond 2043. This has direct implications for the Economic Benefits Assessment, which does not account for the timing or likelihood of uptake or the time value of future benefits.
- Undeveloped commercial land would remain underutilised, resulting in an opportunity cost because alternative uses (particularly residential development) would be foregone or delayed.
- Development of the additional commercial land at Mandeville Village would likely be delayed and operations of some businesses may be challenging, resulting in further underutilisation of already-enabled capacity.
- Businesses within the proposed centre would need to attract a large share of customers from a comparatively wide catchment. This would generate additional vehicle trips into Ōhoka that are not accounted for in the Transport Assessment.

Accordingly, if the Ōhoka FTAA is approved, I agree that provision should be made for a small commercial centre. However, it should be scaled primarily to meet the local community's needs rather than depend on substantial inflows of customers from elsewhere. This issue has been raised in the previous Plan Change processes and with the applicant's team in the informal briefing meeting for this FTAA process.

Neither the assessments prepared for the previous Plan Change processes nor those submitted with the Ōhoka FTAA application provide evidence demonstrating that the proposed scale is appropriate. Instead, they assume that the applicant's proposed scale is justified without assessing whether there is sufficient demand to support a centre of this size.

8.6 FTAA Significant Threshold and Balancing Criteria

Finally, I consider whether the proposal would satisfy the purpose of the Act by delivering significant economic benefits at a regional or national level and whether the proposal meets the criteria for rejection under the Act on the basis that its costs outweigh its benefits.

First, what is the likely scale of the economic benefits attributable to approving the Ōhoka FTAA? I estimate the following outcomes:

- **Construction activity:** a net additional contribution to regional GDP of approximately \$0.7-\$1.3m per annum during the construction period.
- **Ongoing activity:** a net additional contribution to regional GDP of approximately \$0.5-\$1.1m per annum at full occupancy, which is unlikely to be achieved before 2043.
- **Housing affordability:** a negligible effect at the district level and no measurable effect at the regional level.
- **Market competition and supply:** a negligible effect at the district level and no measurable effect at the regional level.

In my opinion, these benefits cannot reasonably be regarded as significant at the regional level for the purpose of section 3 of the Fast-track Approvals Act 2024.

If benefits of this scale were considered regionally significant, almost every residential development would satisfy that threshold, and the statutory purpose would cease to provide a meaningful distinction between ordinary development that should proceed through the RMA process and projects warranting fast-track approval.

Second, what are the potential costs of the Ōhoka FTAA, and are they likely to outweigh its benefits? I estimate the following:

- **Loss of primary production:** a reduction in regional GDP of approximately \$0.7 million per annum.
- **Well-functioning urban environment:** the proposed urban form is likely to be less efficient than accommodating the same households in existing urban areas, with potential consequences for accessibility and productivity. Although these effects have not been quantified in this assessment, they would be material.
- **Transport costs:** additional vehicle-operating and travel-time costs are likely to exceed \$2.6 million per annum at full occupancy.
- **Infrastructure inefficiency:** additional capital and financing costs that could reasonably amount to tens of millions of dollars. These costs have not been adequately quantified or allocated.
- **Other externalities:** residual environmental, greenhouse-gas, amenity and social costs identified by other experts. Although some effects may be mitigated, mitigation does not necessarily eliminate the associated costs to the community.

A formal cost-benefit analysis would provide a more comprehensive comparison and would convert the different annual and one-off effects to a common present-value basis.

Nevertheless, the available evidence indicates that the proposal's costs are likely to outweigh its relatively small regional economic benefits. Figure 3 provides a summary of the economic benefits and costs that which suggests that the proposal will produce a negative outcome (conservatively more than \$2-3 million per annum). In my opinion, this supports a conclusion that the adverse impacts may be sufficiently significant to be out of proportion to the project's regional or national benefits, providing grounds for the Panel to decline approval under section 85 of the Fast-track Approvals Act 2024.

Figure 3: Indicative Benefits and Costs and Net Economic Outcome

Indicative Net Economic Outcome		Per annum	
Economic Benefits		Low	High
Construction Activity		\$0.7	\$1.3
Ongoing Activity		\$0.5	\$1.1
Housing Affordability		negligible	
Market Competition		negligible	
Total Benefits		\$1.2	\$2.4
Economic Costs			
Primary Production		-\$0.7	
Transport Costs		Over -\$2.6	
Infrastructure Costs		Over -\$1	
Other Externalities*		Over -\$0.2	
Total Costs		-\$4.5	
Net Position		-\$3.3	-\$2.1

*GHG of \$0.2 p.a. from Beca, and other costs

9. RECOMMENDATIONS AND CONDITIONS

While I do not consider that the Ōhoka FTAA proposal meets the purpose of the Act, and consider it likely that its costs will outweigh its benefits, the following conditions would improve the proposal and reduce some of the adverse economic effects:

- **Local Centre Zone:** The proposed commercial centre is substantially larger than required to meet the needs of the community. It should be reduced to no more than 1 ha, with total commercial GFA capped at 2,700m². The remaining land could then be used more efficiently, including for additional housing.
- **Infrastructure costs:** The applicant should meet all infrastructure costs attributable to the proposal. This should include standard development contributions and the additional costs of project-specific infrastructure and any consequential upgrades required across the wider network. This would ensure that the Council and wider community do not subsidise the inefficient infrastructure outcomes associated with out-of-sequence development.
- **Polo field and market:** If the polo field and market are relied upon as components or benefits of the proposal, conditions should specify their delivery, timing and ongoing use. Without binding commitments, their claimed benefits should not be relied upon, and the identified land should not subsequently be used for alternative activities that fall outside the scope of the assessed proposal.

10. OVERALL POSITION AND CONCLUSIONS

I consider that the applicant has not provided sufficient evidence to support approval of the Ōhoka FTAA. The material submitted indicates that the development is substantially similar to the proposals previously rejected through the PC31 and DPR hearing processes.

If the applicant's assessments were updated to address the information gaps and methodological issues identified in this review, I consider they would show that:

- 1) The project's economic benefits are not significant at the regional or national level and therefore do not support the purpose of the Fast-track Approvals Act 2024 under section 3.
- 2) The adverse economic impacts are sufficiently significant to be out of proportion to the project's limited regional or national benefits, thereby meeting the test for declining approval under section 85.

Accordingly, I do not support approval of the Ōhoka FTAA on economic grounds.