

Your Comment on the Ōhoka Residential Subdivision

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Ōhoka Domain Advisory Group [REDACTED] Coloured blue in Minute 1 land whose occupiers are invited to comment		
First name	Edward		
Last name	Hamilton		
Postal address	[REDACTED] [REDACTED]		
Home phone / Mobile phone	[REDACTED]	Work phone	
Email (a valid email address enables us to communicate efficiently with you)	[REDACTED]		

2. We will email you draft conditions of consent for your comment			
☒	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

Please provide your comments below, include additional pages as needed.

1. Introduction

The Ōhoka Domain which includes the Ōhoka Bush is directly opposite to the proposed Carter development. The Domain will be substantially impacted by a large development on its boundary. The bush, which includes both dry land and wetland areas, lies beside Ōhoka Stream at the south end of the Ōhoka Domain on Whites Road.

The domain has been the centre of Ōhoka village life since settler times. It was once the home of rugby, cricket and tennis clubs, but these were moved to a multi-sport facility in Mandeville in 1983 due to prevailing heavy ground conditions. These days it acts as the backdrop of the Ōhoka Farmers Market and various community events.

The Ōhoka Domain Advisory Group was established in 2006 to support the preservation and enhancement of the Ōhoka Domain, including the Ōhoka Bush and its significant heritage. Working alongside the

Waimakariri District Council, local community members and school groups have given thousands of volunteer hours to further the environmental, recreational and historical values of the domain.

Over the years, the group's notable achievements have included the restoration, maintenance and enhancement of the Ōhoka Bush, the community funded installation of a double flying fox and BMX track, and the restoration of the historic heritage category 2 listed Gatekeeper's Lodge associated with the former J. S. White's original Ōhoka Estate. Monthly community working bees continue to be held with community volunteers looking after the site. Ours is a close-knit community who know one another, work together and look out for each other. Our whole community is affected by this proposal, but our comments will address issues we feel are of particular consequence to the Ōhoka Domain and Bush and adjacent area.



Ōhoka Bush looking across wetland towards the Gatekeepers Lodge



Walking entrance to the bush from Whites Road



Ōhoka Bush wetland (the grasses are growing in water)

2. No Assessment of impacts on the Ōhoka Domain, Bush or Stream

2.1 Ōhoka Bush is downstream of the development and has been overlooked

The tributary leaves the site at Whites Road and "flows through the Ōhoka Domain and Reserve" (Appendix 19a, Section 3.2). It also receives the largest share of the development's stormwater (Appendix 19a, Section 5.1.1). No report identifies Ōhoka Bush, or the regeneration project, as a receiving environment. The only mention is a photo caption and a reference to amenity links. No water quality was measured at the bush.

None of the applicant's technical reports identify the Ōhoka Bush, or the community's regeneration work, as a receiving environment that could be affected:

- Hydrology Assessment (PDP, Appendix 20);
- Change in Water Balance memo (PDP);
- Storm-water Management Report (PDP, Appendix 31);
- Supplementary Aquatic Ecology memo (Stantec, Appendix 19c).

2.2 Effects the applicant acknowledges that could reach Ōhoka Bush

2.2.1 Contaminants in storm-water. The applicant's ecologist acknowledges that:

- zinc in the storm-water discharge is expected to be above Canterbury Land and Water Regional Plan receiving-water limits;
- suspended sediment is expected at 2.1–12.6 mg/L before mixing, with a proposed consent limit of 50 mg/L;
- storm-water could raise water temperature and lower dissolved oxygen in the spring-fed streams.

Environment Canterbury's reviewer also raised concern that converting 154.7 ha of dairy land to urban use will deliver elevated and irregular nutrient loads. All this water flows into the Ōhoka Stream and through the regenerating bush and associated wetland then on to neighbouring properties to the east.

2.2.2 Changes to stream flow and groundwater. The water balance memo predicts a reduction of about 11.2 L/s in water reaching the shallow groundwater and streams during winter, and an increase in summer. Remnant lowland forest and newly established plantings on the Plains depend on a stable, high water table. The applicant has not assessed what this seasonal shift means for vegetation downstream.

2.2.3. Loss and realignment of spring-fed waterways. About 2.1 km of waterways will be filled in, including 100 m rated high quality. The spring channels feeding the Ōhoka Stream will be realigned. The applicant's ecologist describes these spring-fed channels as "sensitive to change." The Hydrology Assessment's evaluation of spring flows covers only the site itself, not the implications on downstream reaches such as the Ōhoka Bush and beyond.

These impacts are of concern to us.

2.2.4. No monitoring downstream. The proposed ecological monitoring (baseline, Year 1 and Year 3) and the groundwater and spring-flow monitoring are confined to the development site. These waters greatly affect the ecological health of the flora and fauna downstream, yet nothing proposed would detect effects at Ōhoka Bush, and there are no trigger levels or remedies if harm occurs.



Large eels found in Ōhoka Stream downstream of the bush.

2.2.5. Conclusion The applicant's own reports acknowledge contaminant discharges above regional limits, changes to the seasonal pattern of groundwater and stream flow, and disturbance of sensitive spring-fed waterways upstream of the Ōhoka Bush. Yet the bush, and the community's regeneration of it, has not been identified or assessed as a receiving environment. Without an assessment, the panel cannot be satisfied that effects on the Ōhoka Bush will be no more than minor.

3. Flooding

Flooding, Groundwater and Waterway Effects

Reference: Appendix 22 Updated Flood Effects

There is plenty of historic evidence as to the very wet nature of the Ōhoka Domain and surrounds. In fact, the sports field within the Domain was decommissioned in the early 1980's because the

ground was too wet for its continuing intended use. This local history is important to note as it reinforces that groundwater and drainage conditions in this area are not straightforward.

We acknowledge that modelling has been undertaken in relation to the effects of flooding on neighbouring residential properties, but it does not specifically account for the various floor levels to assess potential damage, nor does the assessment adequately address the adverse effects that flooding may have on the Ōhoka Domain and Ōhoka Bush, including the threat posed to the Heritage Category 2-listed Gatekeeper's Lodge.

The extent of flooding in the Ōhoka Domain and its surrounds can be seen in photographs of the recent flooding events in July 2022 and July 2023. Of particular concern is that flooding has occurred without having experienced what might be reasonably regarded as a high-level event. The applicant has not provided modelling for events under a 50 year ARI. Yet, the 12th July 2022 event was only recorded by council as a 5 year 10month ARI event, the 26th July 2022 event was a 3 year, 8 month ARI, and the July 2023 event was recorded as a 15 year ARI event for the Ōhoka area. Due to the persistent saturation of the catchment from a particularly wet year, the water had nowhere to go and flooding occurred.



12 July 2022 Event- flood waters coming off the paddock of the applicant's site overtopping the roadside drain and flowing onto the road and adjacent property.



The same location, a year later 23 July 2023. Looking toward the subject site across Whites Rd from the domain. In the photo on the right, you can see the water overtopped roadside drains on both sides of the road and obscured the footbridge under water causing a safety hazard.



Mill Road in front of the Ohoka Domain looking west, then east during the 23 July 2023 event. The drains were overtopped and further down the road you can see a fire truck attending to a house that was flooded.



Drain overtopped and floodwater running across the domain parking lot toward the BMX track and toilet block earlier in the day, 23 July 2023.

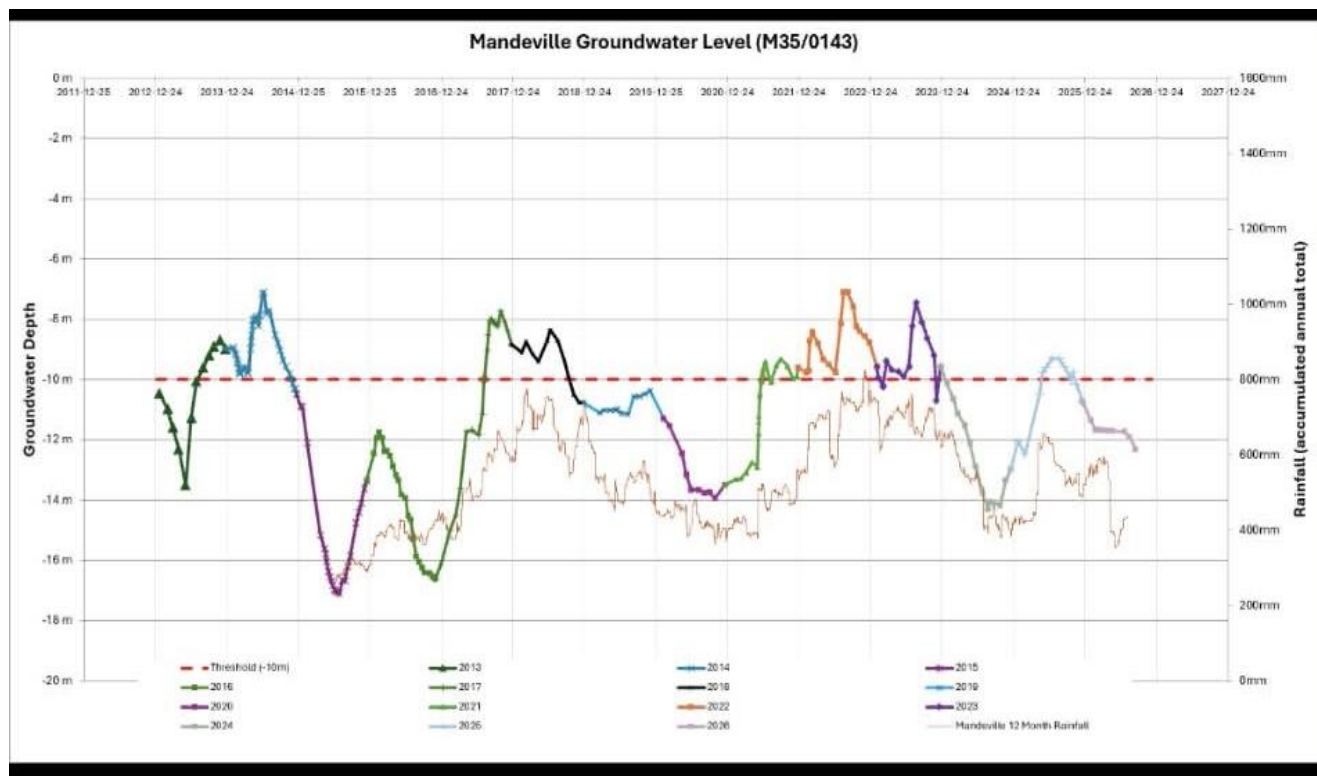


Stormwater flows through from the domain and the Ohoka Stream into Wilson Drive about 100m to the east of the domain. Looking north, then south. 26 July 2022



Wilson Drive again, looking north, then south. These photos were taken a year later 23th July 23. Note submerged footpath.

It has come to be understood through data gathered from local groundwater monitoring bores over time that when groundwater reaches less than 10 metres below the ground level, groundwater resurgence, colloquially known as the 'undercurrent' occurs. This manifests itself in springs and groundwater seeps occurring on the surface of the land in the area, as well as contributing to ground saturation levels affecting the ability of the land to absorb water during rain events. Whilst we may know what the groundwater levels might be at a given time, where the underground water *flows* and exactly *where* it may break to the surface is still poorly understood and difficult to model. This results in flood models that don't incorporate groundwater into their modelling and are therefore less accurate predictors of flooding in Ōhoka. Given the increasing frequency of extreme weather events associated with changing climate patterns, we consider that the potential for more flooding events must be properly recognised and assessed.



The above WDC graph plots groundwater levels against local rainfall. When the groundwater level comes up less than 10m below the surface (represented by the red-dashed line) groundwater resurgence occurs. You can see the correlation between high water tables and flood events over a number of years.

Flooding within the Ōhoka Bush and Domain can be significant. The effects are not confined to the Domain itself but can extend downstream all the way to Kaiapoi and also along Threlkelds Road, with the impacts being particularly pronounced when flooding coincides with high tide due to the tidal nature of the receiving waters at the Kaiapoi end of the river catchment.

Groundwater behaviour in the Ōhoka area is unpredictable, and springs and areas of groundwater seepage can appear in locations where they have not previously been evident as groundwater levels change. As an example, a seep covering approximately 75-100m² occurred immediately east behind the Gatekeeper's Lodge that hadn't existed previously. Rather than fight it, we simply embraced it and planted it out in wetland species that are now thriving. Whilst we have the space in the domain, this might be rather problematic if it happened on a small residential lot.

The developers state that they can limit excessive groundwater rise downstream but acknowledge that this is dependent upon the nature of the proposed works. This qualification is significant and should be properly considered when assessing the potential downstream effects of the development.

These potential effects should not be considered in isolation. The combination of increased groundwater levels, surface-water flows, flooding, contaminants and downstream tidal conditions

has the potential to place significant additional pressure on the Ōhoka Domain, Ōhoka Bush, Ōhoka Stream and surrounding downstream areas.

We therefore consider that the potential effects on the Domain, the Heritage 2-listed Gatekeeper's Lodge, the Ōhoka Bush, Ōhoka Stream and downstream communities require more comprehensive assessment than is currently provided.

4. Threat to bird life

We are particularly concerned that a major housing development 50 metres from the native bush is the ultimate threat to the bird life here.

The potential surge in the local cat population represents an exceptional threat to native wildlife. Decades of diligent community effort could be severely undermined in a short period. Sustained predator control initiatives across the Ōhoka Domain and reserve have successfully encouraged the return of native birds. Local residents have frequently shared reports of these recoveries, including a thriving bellbird population and recent sightings of Kererū on a property immediately south of the development area—the first reported sighting in decades. Transforming Ōhoka into an urban centre will significantly increase the presence of domestic and roaming cats, creating an ongoing risk to indigenous bird life. Without effective safeguards, over twenty years of dedicated volunteer restoration work risks being undone. This risk should be formally recognised by the Fast Track expert panel as an adverse impact.

Research tells us –

<https://www.forestandbird.org.nz/resources/cats-pet-or-pest>

Cats are our favourite pet - 40 per cent of households have at least one. Feral cats are estimated to number in the millions. *(40% of the 800 houses may mean 320 cats minimum)*

- In our cities, native birds do not breed fast enough to stop the decline caused by domestic cats.
- Aotearoa New Zealand has the highest rate of cat ownership in the world.
- They're highly skilled hunters that kill even when they're not hungry and [our native bush is a gourmet feast for them](#).
- Dr Yolanda van Heezik is a New Zealand academic and a professor of zoology at the University of Otago. Dr van Heezik is considered one of New Zealand's first urban ecologists. She has supplied six research papers several of which she has written pertaining to cats as the primary contributors to global biodiversity loss.
- <https://newzealandecology.org/cats-and-biodiversity-nz>

5. Insufficient provision of green-space

The application relies too heavily on the Ōhoka Domain and its Blue-Green Network corridors without providing an appropriate amount of neighbourhood park space suitable for the scale of urban residential development it proposes. This development would house a population of nearly 2,500 people, yet there is nowhere for kids to play ball or to put a playground within the subject site that isn't earmarked for a different purpose. The Ōhoka Domain is already well-used by the existing community and serves a broad catchment across the wider rural area. It was never intended for such intensive residential use on an everyday basis.

Furthermore, being well aware of local ground conditions, we consider that the requirements for a functional polo field will be difficult to meet in the proposed location as the soil composition, drainage and orientation do not lend themselves well to this pursuit. In addition, given the recent reminder from the sale of the Pegasus Golf Course that privately owned land cannot securely be depended on as permanent green-space unless land is vested in the council and designated as recreation reserve, there is no guarantee that it will always be available for the needs of the community.

In the spirit of 'growth paying for growth', the developer should recognise the strain it will put on the community not just on engineered infrastructure, but on the recreational infrastructure that underpins our physical and social wellbeing and better provide for the demand it would drive within the development.

6. Rural Character & Amenity

The Carter Group is leveraging off what is a uniquely special rural village atmosphere that has been created by the community. The village and domain along with its bush, that the locals have freely given thousands of volunteer hours in restoring and nurturing will be forever changed. A large development will destroy the very thing that was so appealing in the first place.

Housing demand here is not for urban scale residential development. People are attracted to Ōhoka for its rural outlook and the housing choice found in its large village lots and lifestyle blocks away from the hustle of suburbia. They come for the wide-open spaces, the dark night sky, the green treed landscape, and the opportunity to keep stock, horses and poultry or cultivate orchards and country gardens. They are drawn here for the quiet, tight-knit community where people know each other by name and look out for one another. These are not readily found elsewhere and urban housing in this rural community will put development and reverse sensitivity pressures on these already rare housing typologies. If they cannot exist here, where can this need be met?

In addition to this, the developers are 'stealing' the Ōhoka Village name, reappropriating it for a much larger urban town the size of Oxford that could easily be sited in a more appropriate location

that can be more cost-effectively and sustainably serviced by the urban infrastructure it requires. Our council has already provided for ample urban residential housing capacity in Waimakariri's main centres in its newly adopted District Plan. Why must we lose a much-loved rural village to simply transfer urban development to a place where it neither belongs nor is needed?

7. In Closing

Thank you for the opportunity to convey our thoughts to the panel. We respectfully ask that this application be declined, on the basis that:

- it will not form a well-functioning urban environment
- it is not regionally or nationally significant
- It will reduce housing typology choice in the district
- it has already been through two previous planning processes and been declined twice
- its proposed benefits will not outweigh the adverse effects and financial costs that its approval would bring upon our community and more broadly, Waimakariri ratepayers and taxpayers.

How to Submit This Form

Your comments must be received by the Fast-track Team by 12 October 2026. Email is the preferred method — you can attach this completed form as a PDF or Word document.

Email (preferred): substantive@fasttrack.govt.nz — put “Ōhoka Residential Subdivision” in the subject line.

Post: Ōhoka Residential Subdivision Fast-track Application, Environmental Protection Authority, Private Bag 63002, Wellington 6140.

In person: Stewart Dawson's Corner, 366 Lambton Quay, Wellington 6011.