

Appendix 8: s53(2)(a) Fast-track Approvals Act 2024 (FTAA) Technical Advice

Date	12/10/2026
To	Consents – Fast-track
Expert Name and Job Title	Isolina O'Brien, Planner – Planning, Canterbury Regional Council
Project advice provided for	Carter Group Limited - Ōhoka Residential Subdivision
Documents referred to	Substantive Application Documents: Appendix 15 – Nick Fuller – Integrated Transport Assessment Substantive Application Documents: Appendix 8 – Other consultation documents and records Appendix 21 Wetland Assessment – Pattle Delamore Partners
Qualifications	LLB, BA majoring in Sociology
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 report 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 material facts that might alter or detract from the opinions that I express.

Introduction/ Executive Summary

- There are several outstanding policy planning issues, specifically:
 - Strategic urban form effects
 - Transport effects
 - Loss of wetlands
- The proposal would provide approximately 800 residential lots at the edge of Ōhoka. The scale and location of the development would result in a substantial expansion of the township and contribute to a more dispersed and fragmented settlement pattern, with associated effects on infrastructure provision, travel patterns, energy use, and the role and function of Key Activity Centres. These effects arise from the scale and location of the proposal and cannot be resolved.
- The proposal is forecast to generate more than 6,000 vehicle movements per day, placing additional demand on the surrounding road network, including the SH1 / Tram Road interchange. NZTA should be provided with an opportunity to assess the effects of the proposal on the SH1 / Tram Road interchange.
- The location of the development and the absence of public transport connections are also likely to result in high reliance on private vehicles, longer travel distances and limited opportunities for public and active transport. This raises concerns about the accessibility of the development to employment, education, services and other destinations, and whether it would contribute to a well-functioning urban environment.

The effects associated with the location of the development, including increased reliance on private vehicles and limited opportunities for modal choice, cannot be resolved.

5. The application proposes the infilling and drainage of approximately 3.5 hectares of wetlands, including wetlands that have been identified as natural inland wetlands under the NPS-FM.

Discussions with the applicant

6. I have not been involved in any communication with the applicant on this matter.
7. Victoria Watt provided policy planning advice on behalf of Environment Canterbury through pre app consultation. It is my understanding that inconsistencies with the CRPS and strategic urban form issues were discussed.

Outstanding areas of contention and significance

Strategic Urban Form

8. The application is for the subdivision and development of approximately 800 lots on the edge of the Ōhoka township, on rural lifestyle zoned land. This would be a considerable extension of the township which currently consists of approximately 250 households.
9. Substantial urban growth in Ōhoka, is at odds with the planned settlement pattern under the Canterbury Regional Policy Statement (CRPS) and Greater Christchurch Spatial Plan (GCSP). The strategic planning framework directs growth towards identified areas where development will result in a consolidated urban form that is integrated with existing and planned infrastructure, rather than the unplanned and fragmented expansion of urban areas.

Canterbury Regional Policy Statement

10. CRPS Chapter 6 directs that growth in greater Christchurch occur in accordance with the strategic urban form on Map A. Map A identifies Greenfield Priority Areas (GPA) and Future Development Areas (FDA) which are located within the Projected Infrastructure Boundary (PIB). These areas are intended to accommodate the region's growth, alongside intensification in existing areas. They have been selected given their strategic location near infrastructure corridors and within the PIB, enabling a consolidated urban form and efficient infrastructure provision.
11. The strategic urban form identified on Map A of the CRPS is the product of almost two decades of strategic planning for growth in Greater Christchurch. It builds on the Greater Christchurch Urban Development Strategy 2007 (UDS), the Land Use Recovery Plan 2013 (LURP), and subsequent growth and infrastructure planning undertaken through

Our Space 2018–2048. Collectively, these processes involved extensive technical work and community input and have progressively shaped the location and pattern of urban growth and infrastructure investment across Greater Christchurch.

12. Key Activity Centres (KAC) are also identified on Map A and are intended as focal points for employment, community activities, and the transport network. Development within or around KACs allows for a coherent pattern of development that is integrated with services, infrastructure, and public transport networks.
13. Ōhoka is not a KAC and there are no GPAs or FDAs in the township. In contrast KACs such as Rangiora, Kaiapoi and Woodend/Pegasus have been selected as sites to accommodate the district's growth because of their strategic location along infrastructure corridors and investment has been directed to these centres to support anticipated growth.
14. Overall, CRPS Chapter 6 seeks to achieve a consolidated and integrated urban form in Greater Christchurch by directing urban development to existing urban areas and identified growth areas. Objective 6.2.1 and Objective 6.2.2 seek to avoid unplanned urban expansion, optimise the use of existing infrastructure, and ensure development is integrated with infrastructure and does not adversely affect strategic infrastructure, including core public passenger transport operations.
15. Policies 6.3.1, 6.3.5 and 6.3.7 give effect to this approach by directing new urban and residential greenfield development to the locations identified on Map A, coordinating the timing and sequencing of development with infrastructure investment and delivery, and avoiding development that adversely affects the function, viability or investment in the Central City and KACs. Collectively, these provisions seek to avoid dispersed and fragmented development and promote efficient patterns of urban growth that support existing and planned infrastructure and centres.
16. The proposal therefore represents development that the CRPS seeks to avoid.

Greater Christchurch Spatial Plan

17. The GCSP satisfies the requirements of a Future Development Strategy under the National Policy Statement on Urban Development (NPS-UD).¹ This includes setting out how well-functioning urban environments will be achieved, and how sufficient housing and business development capacity will be provided to meet expected demand over the next 30 years.

¹ Clause 3.13 National Policy Statement on Urban Development

18. The GCSP echoes the strategic urban form in Map A of the CRPS which directs new development to PDAs and FDAs as a means of accommodating the region's growth, alongside the intensification of existing urban areas. The GCSP also identifies core public transport routes which are aligned with strategic growth patterns.
19. The GCSP seeks a strengthened network of urban and town centres that strengthens Greater Christchurch's economic competitiveness and performance, leverages economic assets, and provides people with easy access to employment and services including by significantly improving public transport connections between key centres.

Effects of accommodating substantial urban growth at Ōhoka rather than in identified growth areas

20. Unplanned development can result in land use patterns that are disconnected from the intended urban form and supporting infrastructure, making it harder to achieve consolidated and efficient growth.
21. Accommodating substantial residential growth at Ōhoka has the potential to increase the cost and complexity of providing and maintaining infrastructure and services. Unplanned development can reduce the efficient and effective delivery of infrastructure and services by directing growth away from areas where infrastructure has existing capacity or is planned to be upgraded. This has the potential to reduce the value for money of existing infrastructure investment, increase the cost of establishing and maintaining infrastructure, and result in the duplication of infrastructure networks.
22. The scale and location of the proposed growth has the potential to contribute to a more dispersed settlement pattern, with associated effects on travel distances and energy consumption. A consolidated urban form can reduce the distances between residential areas and employment, commercial, community and recreational activities, providing greater opportunities for people to access these activities within shorter distances and by a range of transport modes. A substantial increase in the resident population is likely to generate additional trips between Ōhoka and established centres and employment areas.
23. Substantial residential growth at Ōhoka also has the potential to affect the role and function of Key Activity Centres within the Waimakariri District, including through diverting population and demand away from these centres. Inappropriate development outside of Key Activity Centres may undermine the community's investment in these existing centres and weaken the range and viability of the services they provide. Investment in existing centres provides opportunities to build on established services, facilities and commercial activity and to achieve economies of scale as these areas grow. There is therefore an opportunity cost associated with accommodating substantial growth outside the planned settlement pattern.

Significance of this matter

24. The scale of the proposed development is relevant to the potential effects identified. The proposal would provide approximately 800 additional residential lots, compared with approximately 250 existing dwellings in Ōhoka. This represents a substantial increase in the size of the existing settlement, and is beyond the scale of incremental growth within the existing township.
25. At this scale, the development has the potential to materially affect the wider settlement pattern, including infrastructure and transport networks serving Ōhoka and surrounding areas, travel patterns, and the role and function of established Key Activity Centres. These effects are not confined to the development site or the immediate Ōhoka community, but have the potential to affect how people travel, access services and interact with established centres across the wider Greater Christchurch area.

Solution

26. There is no practicable solution that would avoid the effects identified above while accommodating substantial urban growth at Ōhoka. These effects arise from the scale and location of the proposed growth and cannot be addressed through mitigation measures within the development.

Transport

27. The scale and location of the proposed development give rise to two key transport considerations. First, the subdivision will generate a substantial increase in traffic on the surrounding road network, including traffic travelling to and from the SH1 / Tram Road interchange. Second, the location of the development and the absence of public transport connections raise questions regarding transport accessibility and modal choice, particularly the extent to which the proposal would support the uptake of public and active transport and contribute to a well-functioning urban environment.
28. The proposed development will generate a substantial increase in traffic on the surrounding road network. The subdivision is forecast to generate more than 6,000 vehicle movements per day. This additional traffic will interact with the existing network and has the potential to affect the capacity and operation of external intersections, particularly at key connections between Ōhoka and the wider transport network.
29. State Highway 1 (SH1) is Located approximately 8.9 km east of the site and is accessed by the proposed development site via local collector and arterial corridors, including Tram Road and Ōhoka Road. The SH1 / Tram Road interchange provides a key connection between the development and the wider transport network and NZTA designates SH1 along this corridor as a Road of National Significance.
30. The ITA provided by the Applicant notes that operation of the SH1 / Tram Road interchange will be tolerable with the inclusion of the development traffic and background

growth.² However, the right turn from the off-ramp will be over-capacity in the AM peak hour. While the resulting queuing is not projected to extend to the SH1 mainline, this effect will require mitigation through a change to the signal phasing.

31. The engagement record indicates that NZTA has not been engaged in relation to the proposal.³ This is relevant given the scale of the proposed development and the identified effect on the operation of the SH1 / Tram Road interchange.
32. In addition to the effects on the existing road network, the location of the proposed development has implications for transport accessibility and modal choice. The proposal is located outside the planned settlement pattern and in a location without public transport connections. As a result, future residents are likely to be substantially reliant on private vehicles to access employment, services and other destinations.
33. CRPS Policy 6.3.4 seeks development patterns that, where possible, support increased uptake of active and public transport and provide opportunities for modal choice. The location of the proposal outside the planned settlement pattern and in a location where there are not public transport connections is likely to result in increased reliance on private vehicle travel and place additional demand on existing road infrastructure.
34. Similarly, NPS-UD Policy 1 identifies that well-functioning urban environments should, at a minimum, provide good accessibility for people between housing, jobs, community services, natural spaces and open spaces, including through public and active transport, while supporting reductions in greenhouse gas emissions. The proposed development's scale and location should therefore be considered in terms of whether it can provide appropriate transport accessibility, modal choice and a reduction in greenhouse gas emissions.

Significance of this matter

35. The transport effects of the proposal are significant because they extend beyond the immediate site and have implications for the efficient functioning and integration of the wider transport network. The scale of the proposed development, including forecast traffic generation of more than 6,000 vehicle movements per day, would place additional demand on existing transport infrastructure and increase traffic at key connections between Ōhoka and the wider network.
36. The location of the development is also significant because of its implications for transport accessibility and choice. The absence of public transport connections means that residents are likely to have a high reliance on private vehicles to access employment, education, community services and other destinations. This would increase

² Substantive Application Documents: Appendix 15 – Nick Fuller – Integrated Transport Assessment

³ Substantive Application Documents: Appendix 8 – Other consultation documents and records

the volume of vehicle travel generated by the development and limit opportunities for residents to use public and active transport.

37. Urban land use and development in inappropriate locations, or that is poorly integrated with transport networks, can adversely affect the efficient use, development and recovery of transport infrastructure and services. This includes the failure to optimise the use of available capacity within the existing transport network.
38. Land use patterns need to be organised so that energy requirements are minimised and the efficient functioning of strategic transport networks is not compromised by traffic associated with local development or reverse sensitivity concerns. Reduced efficiency in the transport network will increase costs for businesses, as well as commuters.
39. Poorly integrated development, or development in inappropriate locations, can also affect the accessibility and uptake of public transport and active modes of transport, and combined with increased air pollution can reduce the potential for improved public health. Well-designed development that integrates with transport networks, and that makes efficient use of existing capacity, is essential to providing for business growth and access to community services.
40. The proposal represents a substantial increase in urban development in a location where transport infrastructure and public transport provision are limited, with implications for the efficiency of the existing network, the strategic transport network, accessibility and opportunities for modal choice.

Solution

41. The effects on the surrounding transport network should be addressed through appropriate engagement with NZTA. Given the relationship between the proposed development, the SH1 / Tram Road interchange and the wider strategic transport network, NZTA should be provided with an opportunity to consider the proposal and identify any requirements relating to the operation, safety and management of SH1 and its associated intersections.
42. The location of the proposed development, outside the planned settlement pattern, would result in a dispersed urban form with limited access to public transport. This is likely to increase reliance on private vehicle travel, resulting in longer travel distances and associated increases in greenhouse gas emissions. These effects arise from the location of the site and cannot be resolved.

Wetlands

43. The application seeks approval for the infilling and drainage of approximately 3.5 hectares of wetlands.

44. The wetlands on the site may meet the criteria for ecological significance as set out in CRPS Appendix 3. Policies 9.3.1, 9.3.5 and 7.3.3 seek to identify and protect ecologically significant wetlands and their associated indigenous biodiversity values, while promoting the protection, enhancement and restoration of remaining wetlands and adjoining vegetation necessary for their ecological functioning. Policy 7.3.5 also recognises the importance of maintaining the hydrological functioning of wetlands by managing land use, drainage and changes to surface water flows and groundwater recharge that could adversely affect wetland water supply.
45. Fifteen wetlands on the site have been assessed as meeting the criteria for natural inland wetlands under the NPS-FM.⁴ Policy 6 of the NPS-FM requires that there is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted. Policy 2A.3 is included in the Canterbury Land and Water Regional Plan (CLWRP) as required by Clause 3.22 of the NPS-FM. This policy requires that there is no further loss of extent of natural inland wetlands except where the regional council is satisfied that:
- i. the activity is necessary for the purpose of urban development that contributes to a well-functioning urban environment (as defined in the National Policy Statement on Urban Development); and
 - ii. the urban development will provide significant national, regional or district benefits; and
 - iii. the activity occurs on land identified for urban development in operative provisions of a regional or district plan; and
 - iv. the activity does not occur on land that is zoned in a district plan as general rural, rural production, or rural lifestyle; and
 - v. there is either no practicable alternative location for the activity within the area of the development, or every other practicable location in the area of the development would have equal or greater adverse effects on a natural inland wetland
46. As discussed above the proposal does not contribute to a well-functioning urban environment, the land is not identified for urban development, and the land is zoned rural lifestyle. The proposed infilling of natural inland wetlands on the site is therefore contrary to CLWRP Policy 2A.3.

Benefits of the project

⁴ Substantive Application Documents: Appendix 21 Wetland Assessment – Pattle Delamore Partners

47. There are no specific benefits with respect to my area of expertise.