

**WAIMAKARIRI DISTRICT COUNCIL RESPONSE TO MINUTE 3
OHOKA RESIDENTIAL SUBDIVISION FAST TRACK
FTAA-2606-1253**

To: Panel Convener

From: Waimakariri District Council

Date: 12 August 2026

1. Introduction

1.1. This memorandum provides Waimakariri District Council's ("Council") written response to Minute 3 of the Panel Convener, dated 7 August 2026, in relation to the substantive application by Carter Group Limited under the Fast-track Approvals Act 2024. The application seeks approval to subdivide and develop land at Ōhoka for approximately 850 residential dwellings, a commercial or mixed-use centre, a polo field, and the potential establishment of a school or retirement village. The Panel Convener has directed participants to provide written responses by 10:00am on Wednesday 12 August 2026, ahead of the convener's conference scheduled for Monday 17 August 2026.

1.2. Council's response is directed to the matters identified in Minute 3, including the extent of engagement by the Applicant, information gaps in the application material, the key issues in contention, matters that may be capable of resolution through conditions, the complexity of the application, and suggested processes to assist the Panel to understand, resolve, or narrow the issues within an appropriate decision-making timeframe. Council's comments are provided on a preliminary basis, reflecting the limited period available to review the full application material and obtain input from relevant planning and technical specialists.

2. Extent of engagement by the Applicant

2.1. Council acknowledges that engagement occurred between the Applicant and Council

prior to lodgement of the application. While some draft information was provided from 24 April 2026 onwards, a number of key technical assessments, including the Integrated Traffic Assessment, Economic Assessment, Greenhouse Gas Assessment, and Planning Assessment, were not made available until lodgement. Consequently, Council's ability to undertake a meaningful and comprehensive pre-lodgement review of the proposal was constrained.

- 2.2. Given the scale of the application, Council considers that a more complete pre-lodgement review of the application material may have assisted in identifying issues, refining information requirements, and narrowing matters requiring further assessment.
- 2.3. Since lodgement, communications have continued between the Applicant and Council regarding matters arising from the application, including technical matters and proposed conditions. Council remains available to discuss relevant technical, procedural, and conditions-related matters as part of its ongoing assessment of the application.

3. Information gaps in the technical reports

- 3.1. At this stage, the information gaps identified by Council are set out in the s46 response (see Appendix A for table included in the s46 response). Council is continuing to review the full application material and may identify further information gaps as technical assessments are completed.

4. Council experts and technical advisors

- 4.1. Council has identified the following in-house officers and external technical advisors to assist with its preliminary review of the application material and to provide input on the key planning and technical matters likely to arise through the fast-track process. This list reflects the areas of expertise currently engaged by Council and may be refined as further review of the application material is completed.

Table 1: List of Waimakariri District Councils Experts

Expertise	Name/Company
Planning	Tim Johnston (Waimakariri District Council)
Transport	Beca and Shane Binder (Waimakariri District Council)
Parks and Reserves	Rachael Annan (Waimakariri District Council)
Terrestrial Ecology	Wildlands
Urban Design	Boffa Miskell
Rural Landscape	Boffa Miskell
Green House Gas Emissions	Beca
Flooding	DHI Group
Three Waters	Beca
Geotechnical	Beca
Contaminated Land	Canterbury Regional Council
Economics	Formative

5. Principal issues in contention

- 5.1. The principal issue with the proposal is its location. The site is not within an urban environment, nor is it a location where large-scale urban residential development of this nature and scale is anticipated. Council considers that establishing a substantial urban development in this rural context would give rise to significant issues for the wider environment, including effects on the transport network, infrastructure and servicing, stormwater and flooding, rural character and amenity, and the neighbourhood and community values of Ōhoka.
- 5.2. Council has also recently undertaken a District Plan Review process to identify and provide for appropriate growth locations across the district. Through that process, this area was not identified as a growth area for large-scale urban residential development. Council considers this is a relevant contextual matter, as the proposal seeks to establish substantial urban growth in a location that has not been selected or planned for through the most recent district-wide planning process. For similar reasons, Council does not consider the proposal meets the National Policy Statement on Urban Development 2020, particularly as it would not contribute to a well-functioning urban environment and is not located in an area with good access to existing services, public

transport networks, and infrastructure.

- 5.3. Council considers these matters cannot be readily resolved through conditions. While conditions may address discrete engineering or design details, the central issues arise from the fundamental location and scale of the proposal and the cumulative effects of establishing a substantial urban settlement in a rural environment. Conditions cannot readily overcome the absence of strategic planning support for urban growth in this location, nor can they fully address the broader consequences for transport patterns, infrastructure efficiency, flood risk, rural character, amenity, and the functioning of the existing Ōhoka community.

6. Issues capable of resolution through conditions

- 6.1. Some engineering matters may be capable of resolution through conditions, where the Applicant agrees to fully fund or otherwise provide the infrastructure upgrades required to service the growth generated by the proposal. This would need to include any necessary upgrades to local and wider network infrastructure, appropriate timing and staging requirements, and mechanisms to ensure the costs of growth are not transferred to Council or the wider ratepayer base. However, Council notes that agreement to pay for growth-related infrastructure does not, of itself, resolve the broader planning concerns associated with the location, scale, urban form, and wider environmental effects of the proposal.
- 6.2. In addition, certain urban design, staging, landscape and commercial centre matters may also be capable of partial resolution through conditions, provided an appropriate framework is established to secure the outcomes relied upon in the application documentation.

7. Complexity of the application

- 7.1. Council considers the application to be complex due to the scale and nature of the development proposed, its location outside an identified urban growth area, and the

breadth of planning, infrastructure, transport, stormwater, flooding, ecology, landscape, urban design, economic, and servicing matters that require assessment. The proposal would introduce substantial urban development into a rural settlement context and raises interrelated issues that cannot be considered in isolation.

- 7.2. The complexity of the application is further heightened by its planning history, as urban development in this location has previously been declined through both the private plan change process and the recent District Plan Review.
- 7.3. In Council's view, the complexity of the application is also increased by the number of information gaps identified through the preliminary technical review and the need to test the feasibility and effectiveness of proposed mitigation and conditions.

8. Proposed conditions

- 8.1. The applicant has recently provided a draft set of proposed conditions, which are currently under review by Council. At this stage, these conditions serve as an initial starting point only. Council's technical experts are continuing to assess the proposal, and their responses are expected to identify additional matters that will require new conditions or amendments to the applicant's draft conditions.
- 8.2. Based on the review undertaken to date, Council considers that substantial further work is required to refine, amend and expand the proposed conditions to ensure they appropriately address the actual and potential effects of the development and provide a robust framework for implementation, monitoring and compliance. The final suite of conditions will be informed by the recommendations of Council's experts and the outcomes of the ongoing assessment process.
- 8.3. Council is also concerned that the proposed land use and urban design conditions do not currently provide sufficient certainty that the urban form, amenity, and commercial outcomes described in the application will be achieved. In particular, the conditions

provide limited certainty regarding the nature, scale, composition, and delivery of activities within the proposed commercial centre. Further work is therefore likely to be required to provide greater certainty regarding the function and form of this component of the proposal.

- 8.4. Council officers will discuss potential condition wording, and implementation matters with the applicant as part of the ongoing assessment process. This engagement is intended to assist in identifying and resolving issues where possible and does not prejudice Council's consideration of the application or the final form of any recommended conditions.

9. Efficient processes and decision timeframe

- 9.1. Council's technical experts are currently preparing discipline-specific memoranda on the proposal and meeting with the applicant where possible in the next two weeks. These reviews and meetings are expected to assist in further scoping the key issues arising from the application and identifying matters capable of resolution through conditions. Council notes that the scale and complexity of the proposal have placed considerable demands on both internal and external technical resources, which has influenced the pace of some aspects of the review process. However, Council considers that a thorough technical assessment is necessary given the significance of the issues raised by the application.
- 9.2. Council considers that a formal expert conferencing and joint witness statement process would be an efficient means of identifying matters of agreement and disagreement between technical experts, narrowing the issues requiring determination by the Panel, and assisting with the development of a more complete and robust set of conditions. Given the scale and complexity of the proposal, including the range of technical disciplines involved and the extent of condition drafting still required, such a process is likely to improve the efficiency and quality of the decision-making process.

- 9.3. While Council and the applicant have commenced discussions on technical matters and proposed conditions, Council considers these discussions should progress to a more structured and formalised process. Given the complexity of the application and the significant public interest it has generated, expert conferencing and joint witness statements would assist in transparently identifying areas of agreement and disagreement, refining proposed conditions, and providing the Panel with a clearer basis for its determination.

10. Conclusion

- 10.1. Council considers the proposed development raises a range of significant planning, infrastructure, environmental, servicing, and urban design issues that warrant careful consideration by the Panel. The scale of the proposal, its location outside an identified growth area, and the breadth of technical matters requiring assessment contribute to a level of complexity that extends beyond that of a typical residential subdivision proposal.
- 10.2. While Council's review of the application remains ongoing, the preliminary assessment undertaken to date indicates that a number of substantive issues remain unresolved and that further technical review, information assessment, and condition development will be required. Council considers that a structured expert conferencing process, including the preparation of joint witness statements where appropriate, would assist in narrowing issues, identifying areas of agreement and disagreement, and supporting an efficient and robust decision-making process.
- 10.3. Council will continue to participate constructively in the fast-track process and provide technical input as required to assist the Panel in its consideration of the application.



Kelly LaValley
General Manager Planning, Regulation, and Environment

Appendix A: Council comments on completeness of the Ōhoka Residential Fast-track Application

Topic	Comments
Economic Benefits	1. Development timeframe, discounting, and benefit realisation: The assessment does not account for the timeframe over which the development is expected to occur. As a result, the estimated benefits are likely overstated because they are presented in nominal terms and have not been discounted to present values. To enable a consistent comparison with the assessment of costs, the estimated benefits should also be converted to present values using an 8% discount rate, reflecting the timing of when benefits are expected to be realised. This omission is particularly important given the subsequent issues identified are all inherently time-dependent and will affect the timing and profile of benefit realisation. Failure to incorporate these dynamics risks overstating both the magnitude and immediacy of net economic benefits. 2. Gross economic impacts vs net economic benefits: The assessment refers to "net economic benefits"; however, the reported GDP and employment impacts are presented in gross terms, with no adjustment to estimate the net economic benefits. Cost assessment indicate 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 are likely to overstate the net economic benefits attributable to the development. 3. 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. 4. Settlement population: The assessment reports population at 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 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. 5. 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
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determine whether the proposed dwellings are likely to improve housing affordability in practice.

6. Development capacity

The assessment relies on the WCGM22 capacity 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.

7. 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.

8. 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.
Economic Costs	1. 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. 2. 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. 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. 3. 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. 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, 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.
Transport	1. Public transport services Assessment or proposal of public transport services is required. 2. Integrated Traffic Assessment The Integrated Traffic Assessment (ITA) does not assess all relevant transport matters, including public transport use, walking and cycling access, accessibility by a range of transport modes, pedestrian access to the nearest

	bus stop, anticipated trip generation for all transport modes, cumulative transport effects, and consistency with the local and regional transport policy framework, including the Canterbury Regional Land Transport Plan 2021-31. 3. Crash prediction modelling The ITA makes multiple references to crash prediction modelling. This modelling has been undertaken for intersections only, with no modelling provided for midblocks.
Wastewater	An assessment of alternatives for wastewater disposal is required. The reasons are as follows: 1. The proposal for a pressure sewer system is not in accordance with Council's Wastewater Policy, which requires a gravity system to be used. It is not considered that the thresholds for a pressure system have been met. 2. The method used to estimate the flow rate and volume of sewage to be discharged does not adequately factor in the level of inflow and infiltration expected, and therefore the flow rates and volumes used in the assessment are underestimated. 3. The proposal to discharge via a connection into the existing rising main is not considered feasible, particularly as the flows have not been accurately estimated. • The proposal to store a large volume of wastewater is not considered an acceptable outcome, particularly given its proposed proximity to a residential area and concerns that the required storage volume has not been correctly calculated. 4. There is a capacity constraint at the Rangiora Wastewater Treatment Plant, which is limiting the amount of flow it can accommodate at the present time. There is also a large amount of other land that has been rezoned within the Rangiora WWTP catchment. Therefore, it is not considered to have sufficient capacity to accept the additional flow from this proposal.

Water Supply	The water supply assessment is insufficient for the following reasons: 1. The yield of the proposed production wells has not been established, and the final well locations have not been confirmed. The strategy assumes that four to five wells will be capable of meeting the projected demand; however, this has not been supported by pump testing, yield assessments, or hydrogeological modelling. It cannot be assumed that the required level of supply is achievable without supporting evidence. 2. No storage sizing calculations have been provided. Without this information, it is not possible to assess whether sufficient land has been allocated for the treatment and storage infrastructure. 3. No headworks site has been identified. The location and footprint of the treatment plant, storage reservoirs, pump station, and associated infrastructure should be confirmed at the consenting stage to ensure sufficient land is available and that the proposed subdivision layout does not compromise future operation and maintenance requirements. 4. No hydraulic modelling has been provided to demonstrate compliance with the required levels of service, including pressure, flow, firefighting performance, and network operation under peak demand conditions.
Stormwater	There is insufficient evidence to demonstrate the feasibility of the proposed stormwater management approach. In particular: 1. There is limited ability to assess whether the proposed Stormwater Management Areas (SMAs) can physically accommodate the required treatment, attenuation, and conveyance functions based on the information provided. The land area currently allocated for stormwater management may be insufficient to accommodate the required stormwater infrastructure. 2. The proposed attenuation strategy relies heavily on offset storage between catchments, particularly the use of the polo field to provide attenuation along with the balancing of storage requirements between multiple catchments. The evidence acknowledges a current attenuation storage shortfall and states this will be addressed through future optimisation. If there is shortfall it should be resolved now.

	3. Further assessment of downstream volumetric effects and flow regime changes resulting from the proposed development. This is required as the evidence provided focuses on attenuation of peak flows and does not provide a detailed assessment of downstream volumetric effects. There is insufficient information to demonstrate that the development will not alter the volume, duration, or timing of discharges to downstream waterways and drainage networks 4. Assessment of the stormwater network and confirmation that both the primary and secondary flow paths can safely convey the design event without causing adverse effects on the proposed development or the downstream stormwater system.
Ecology	A full ecological impact assessment is required for the following reasons: 1. The avifauna survey outlines what is on site but does not attribute a value to the features, outline the potential impacts during development or operational phases, or recommend appropriate mitigation or compensation. The letter states that the site is of low ecological value and that removal is unlikely to significantly disrupt habitat connectivity, but it does not address the value of habitat for foraging, roosting, and nesting; mitigation for protecting breeding birds; or any compensation such as landscaping. While many species are not threatened, the observation of a tūī could be classed as locally or regionally significant, but this is not discussed. 2. The lizard management plan provides survey information; however, there has been no value assessment of the faunal SNA and no assessment of impacts on habitat, including how much lizard habitat is being permanently removed, what compensation is required, and what the impact is on the lizard population.
Neighbourhood Reserves	The application does not provide sufficient information to demonstrate how neighbourhood reserve provision has been determined or assessed against Waimakariri District Council's level of service requirements. In particular, insufficient information has been provided to demonstrate:

	a) Whether neighbourhood reserve provision meets the Council's level of service standard of 1 hectare per 1,000 residents. b) The total area, location and distribution of neighbourhood reserves proposed across the development. c) Whether neighbourhood reserves will achieve the 500-metre walking catchment for residents. d) Whether proposed neighbourhood reserves are of sufficient size, dimensions and configuration to support their intended recreational function, including informal recreation and junior sport activities. e) The extent to which the proposed reserve network is capable of achieving the relevant level of service outcomes for future residents. As a result, it cannot be determined whether the proposed neighbourhood reserve network is adequate to serve the anticipated population or whether the development appropriately provides for neighbourhood-level recreation outcomes.
Landscape	1. Rural Openness to Urban Form The landscape assessment contains insufficient information to support the reliance placed on the permitted baseline, particularly given the scale and significance of the proposal. The assessment does not provide a sufficiently detailed evaluation of the qualitative difference between dispersed rural lifestyle subdivision and the proposed contiguous urban form, nor does it adequately justify the conclusion that landscape effects would be Low–Moderate having regard to the scale, density and permanence of the proposed change. 2. Planting Mitigation The landscape assessment places significant reliance on proposed planting as effective mitigation, but contains insufficient information to demonstrate that this mitigation is achievable or effective relative to the scale and significance of the proposal. In particular, limited detail has been provided on planting stages or phases, the size and maturity of trees and vegetation at the time of planting,

	the assessment year or growth stage relied on for the visual effects assessment, and the maintenance and management measures required to ensure planting is successfully established and retained over time. 3. Landscape Treatments and Boundary Interfaces The landscape assessment contains insufficient information to demonstrate how the proposed landscape treatments and boundary interfaces would appropriately reflect or respond to the existing landscape character. Most of the proposed planting appears to be new. Given that much of the existing character is derived from established exotic tree species and vegetation patterns, further detail is required for each landscape treatment area to understand the proposed species palette, the appropriateness of those species, and how the treatments would maintain, reinforce or appropriately transition from the existing character. 4. Landscape Management Plan The application does not include a Landscape Management Plan. Given the scale and complexity of the proposed Ōhoka development, a Landscape Management Plan is required to demonstrate how the long-term care, maintenance, replacement, and performance of landscape areas will be achieved.
Urban Design	1. Urban Form Relationships The assessment contains insufficient information to demonstrate how the proposal's urban form would integrate at district and regional levels. It does not provide a sufficiently detailed assessment of the relationship between efficient land use, multi-modal accessibility and the intensity of built form, including whether the proposal reflects transit-oriented development principles or other

recognised urban form outcomes, and whether the proposal would contribute to a well-functioning urban environment.

2. NZ Urban Design Protocol

The assessment against the NZ Urban Design Protocol contains insufficient information and is generally light relative to the scale and significance of the proposal. It does not provide a sufficiently detailed or evidence-based assessment of the relevant protocol outcomes, and several assertions are not supported by clear references or analysis, including statements regarding the effect of constraints on existing planned infill and greenfield growth areas. In several instances, including the assessment of 'creativity' and 'collaboration', the commentary is limited and is similar in length to the definition being assessed. A number of responses also do not fully address, or are not closely correlated with, the definitions set out in section 1.1.2 of the Urban Design Assessment. As a result, the assessment does not provide sufficient information to determine whether the proposal appropriately responds to the NZ Urban Design Protocol or supports good urban design outcomes.

3. Crime Prevention Through Environmental Design

The Crime Prevention Through Environmental Design (CPTED) analysis contains insufficient information and is not sufficiently detailed relative to the scale and significance of the proposal. It does not fully assess each of the four principles outlined in the National Guidelines for CPTED (2005) prepared by the Ministry of Justice, including Surveillance, Access Management, Territorial Reinforcement and Quality Environments. The assessment also relies on the stated intention that the scale and character of buildings will reflect the existing character of Ōhoka, including the use of materials and forms sympathetic to the existing context and rural vernacular. However, no design guidance, assessment criteria or other mechanisms have been provided to manage these effects, substantiate this intention, or demonstrate how it would be delivered through the proposal. As a result, the assessment does not provide sufficient

	information to determine whether appropriate CPTED and built-form outcomes would be achieved.
Earthworks	1. Cut and Fill Plan The information provided does not include a detailed cut-and-fill plan showing the extent and depth of proposed earthworks across the site, instead identifying on broad areas of cut and fill. The scale of the proposed level changes is important to understand, as it will influence whether retaining walls, battered slopes, or other engineering solutions are required. This information is also necessary to assess potential effects on lot layouts, fencing, accessibility, and ongoing maintenance responsibilities.