Ōhoka School
261 Jacksons Road
Ōhoka

Ōhoka School Infrastructure and Traffic Impact Assessment

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

Material Reviewed:

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

1. Executive Summary and Baseline Infrastructure Failure

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

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

1.3 By failing to model the daily peak-hour traffic movements associated with the Ōhoka School run, the application masks the true operational limits and safety hazards of the immediate school network. To provide the Expert Panel with accurate, on-the-ground operational data, the Board conducted a targeted Community & School Impact Survey. (*Note on Methodology: The cross-sectional survey was administered from 25/09/2026 to 02/10/2026 to the population of*

school households (N=153). We achieved a sample size of n=39 (a 26% response rate). Given this is a voluntary response sample, we acknowledge the inherent self-selection bias: respondents logically represent the most highly engaged and concerned stakeholders within the school community. Rather than inferring these point estimates represent the entire population, these figures empirically quantify the severe infrastructural friction already experienced daily by a quarter of our active school community.) The baseline empirical data from our respondents indicates that the local road network and school parking infrastructure are already heavily constrained and failing to safely accommodate active student transport.

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

2. Current Traffic and Parking Exhaustion

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

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

3. Active Transport and Student Safety Risks

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

- **3.2 Documented Safety Threat:** 24 of 39 families (**62%**) hold explicit health and safety concerns regarding their children traveling to and from school.
- **3.3 Hostile Active Transport Environment:** Parents report that many local roads have no safe space for kids to ride bikes or walk, and that speeding vehicles pose an immediate, daily threat.
- **3.4 Community Experience:** Parents highlighted the immediate danger to children

attempting to use active transport: *"Its busy at the moment, I live down a local road and barely can walk to school because people... don't slow down from 100km p/hour while passing a walker/biker."* Another parent noted: *"I'd prefer to send my kids by bike but without a clear cycle lane I don't feel it's safe enough to do so."*

- **3.5 Unfunded Mitigation:** The Applicant's ITA concedes that shared path upgrades on Mill Road from Whites Road to Ōhoka School are "Planned, but not funded". Adding continuous heavy transport and fill-hauling trucks to this unmitigated environment poses an unacceptable risk to student lives.
- **3.6 WDC Identified ITA Gaps:** Waimakariri District Council (WDC) has also noted gaps in the Applicant's ITA. In their 9 July 2026 letter to the EPA (Completeness Memo, Appendix 2, pp. 7–8), WDC identified missing data regarding walking and cycling access, trip generation across all modes, cumulative effects, and midblock crash modelling. This supports the Board's conclusion that the full impact and variance on the active transport network remain unquantified.

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

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

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

- *"If the school were to grow by 2 or 4 times its current size it would lose its rural feel and I would imagine a lot of space the kids now use to run around and play would need to be used for new classrooms."*
- *"This development going ahead would cause huge health and safety issues for children travelling to school. It would also destroy the special rural character the school has."*

5. Requested Relief and Proposed Mandatory Conditions

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

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

Condition 1: School-Hour Construction Traffic Curfews

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

Condition 2: Front-Funded Active Transport Infrastructure

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

Condition 3: Safe Drop-Off and Parking Mitigation

- **The Risk:** The school's current parking is already operating at failure capacity. The development's added traffic—and the lack of safety assessment for the Mill Road / Jacksons Road intersection—will result in unsafe, chaotic verge-parking and reversing

hazards.

- **The Rule:** The Applicant must provide funded mitigation for school frontage upgrades, including the construction of a dedicated, off-carriageway "drop-off/pick-up zone" to alleviate the congestion caused by their induced traffic demand.
- **The Trigger:** To be designed in consultation with the Waimakariri District Council and the School Board, and completed prior to the occupation of Stage 1 housing.

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

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

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

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

On behalf of the Ōhoka School Board

Dr Daniel Myall
Presiding Member
Ōhoka School Board
[redacted]

[redacted]