

Waimakariri District Council's comments on a Substantive Application Fast-Track Approvals Act 2024

Fast Track Application FTAA-2606-1253 Ōhoka Residential Subdivision

Date: 12 October 2026

To: Kate Barry-Piceno
Ōhoka Residential Subdivision Expert Panel Chair

From: Waimakariri District Council

Fast-track project: FTAA-2606-1253

Thank you for your invitation to provide written comments on the substantive application ("the Application") for the Ōhoka Residential Development under the Fast-track Approvals Act 2024. The following comments are provided pursuant to section 53(2) of the Fast-track Approvals Act 2024 on behalf of Waimakariri District Council. These comments represent Council's expert planning assessment of the Application and are intended to assist the Panel in its decision-making process under the Act. Waimakariri District Council's planning comments are set out below.

1. EXECUTIVE SUMMARY

- 1.1 I (Tim Johnston) have reviewed the Ōhoka Residential Subdivision application and the supporting technical evidence. This report has also been prepared having regard to the matters identified by the Fast-track Approvals Panel in Minute-1-Invite-to-comment, with the Council's response informed by the planning assessment contained in this report and the specialist technical reviews contained in Appendix 1
- 1.2 The proposal would deliver housing, construction and investment activity, a local commercial centre, internal walking and cycling connections, and a green-blue and open-space network.
- 1.3 However, the proposal would also establish a substantial new urban settlement in a location not identified for growth in the Greater Christchurch or Waimakariri strategic planning framework. I am of the opinion that the benefits do not outweigh the proposal's strategic, environmental, infrastructure and settlement-wide effects and unresolved risks. The table below is a summary of the key Issues.

Table 1: Key findings

Key Issues		
Matter	Summary finding	Comment
Strategic planning and housing need	The site is outside the planned growth framework. Existing plan-enabled housing capacity substantially exceeds forecast demand. Accordingly, while the proposal would provide additional housing supply, it is likely that a significant proportion of demand would be diverted from other locations within Greater Christchurch rather than representing unmet growth that cannot otherwise be accommodated. Overall, I am of the opinion the proposal is not regionally significant and is not necessary in an area not zoned or planned for.	Significant adverse effect
Economics and infrastructure efficiency	The proposal does not demonstrate a housing shortfall. Economic evidence indicates that growth would largely be redistributed from existing urban areas, with limited affordability benefits and potential infrastructure inefficiencies. The proposal would also require substantial infrastructure investment, particularly in transport networks, which may necessitate the reprioritisation of Council infrastructure programmes and divert investment away from planned growth areas that can be serviced more efficiently and, in a manner, more consistent with the Council's strategic growth framework. The economic benefits do not show a regionally significant proposal and don't outweigh the strategic planning concerns associated with unplanned urban expansion.	Significant overstatement of regional benefits
Well-functioning urban environment and transport	The proposal performs reasonably well internally but would remain strongly dependent on private vehicles for access to employment, higher-order services and community facilities. Direct network effects may be mitigated through substantial applicant-funded upgrades.	Significant adverse effect
Stormwater	The applicant has not demonstrated that the proposed stormwater system and stormwater management area footprints are sufficient to achieve required levels of service or appropriately mitigate off-site effects. Further hydraulic modelling and design development are recommended prior to determination. In addition, there remains uncertainty regarding the interaction between groundwater and the proposed stormwater network and management devices. This uncertainty	Fundamental information gap

	creates a risk that the system may not function as anticipated, resulting in ongoing operational, maintenance and performance issues. In the absence of sufficient information, it has not been demonstrated that adverse effects can be appropriately avoided, remedied or mitigated, and these matters cannot be adequately addressed through consent conditions alone.	
Flooding	Independent review identifies unresolved uncertainty regarding flood modelling assumptions, downstream effects, stormwater management performance and flood risk outcomes. The review concludes key matters should be resolved prior to determination.	Fundamental information gap
Potable water supply	The proposed groundwater source has not been proven for the full development, including sustainable yield, treatment, storage, resilience and firefighting demand. Conditions cannot establish a water source that has not been demonstrated.	Fundamental information gap
Wastewater	The existing Bradleys Road system does not have capacity to accommodate the development and connection would fundamentally alter its intended operation, increase operational risk and reduce service levels to existing users. Further information and a revised wastewater servicing strategy, including confirmation of conveyance to Kaiapoi WWTP, are required before the proposal can be properly assessed	Fundamental information gap and material concern
Landscape and rural character	The proposal would permanently urbanise a substantial rural area, become the dominant component of Ōhoka, and materially alter the settlement's scale, identity and relationship with its rural setting. Planting would soften visual effects but not avoid the underlying change. In addition, the landscaping isolates the development and does not integrate it with the existing Ōhoka.	Significant adverse weight
Recreation and community infrastructure	Based on Council's neighbourhood park level of service the proposal is approximately 2.5 hectares short of the functional neighbourhood park land required to service the anticipated population. While the proposal includes ecological, stormwater and movement corridors, these areas do not provide the same recreational and community functions as dedicated neighbourhood parks. Consequently, the shortfall would increase reliance on existing park facilities within the wider area.	Material concern
Proposed conditions	The draft conditions do not yet secure all design, amenity, infrastructure, open-space and mitigation outcomes relied upon in the application. Fundamental	Comprehensive revision required if approved

	locational effects and an unproven water source cannot be cured by conditions.	
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- 1.4 I consider the adverse impacts and unresolved risks are sufficiently significant to be out of proportion to the proposal’s claimed “regional benefits”, even after allowing for mitigation and additional conditions. Key economic evidence from Mr Rodney Yeoman (Appendix 2) clearly indicates that the proposal does not meet the purpose of the Fast-track Approvals Act 2024 and any benefits are outweighed by the significant cumulative impacts and information gaps shown throughout Council’s technical expert evidence.
- 1.5 Council therefore recommends that the Expert Panel decline the application under section 85(3) of the Fast-track Approvals Act 2024.
- 1.6 If the Panel is minded to grant consent, the applicant should first resolve the fundamental flooding, stormwater and potable water information gaps, and any approval should include comprehensive revised conditions that secure the relied-upon design and amenity outcomes, require applicant-funded infrastructure before each stage proceeds, and protect Council and existing ratepayers from unfunded capital, operational, maintenance and vesting liabilities. Appendix 1 of this report contains collated information gaps and areas that can be resolved by conditions.

2. PREAMBLE

- 2.1 My name is Timothy Johnston, and I am employed as a Principal Resource Management Planner for Waimakariri District Council, where I have worked for approximately four years. I have seven years' planning experience across a range of areas, including multiple large-scale residential subdivisions. I have appeared before the Environment Court as a planning witness and at various council hearings. I am a member of the New Zealand Planning Institute.
- 2.2 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 material facts that might alter or detract from the opinions that I express.
- 2.3 The purpose of this report is to assess the planning implications of the proposal, place the technical evidence in its planning context, and make a recommendation to the Panel against the Fast Track Act 2024. For completeness, I note this report has been prepared without assessing the implications of the Planning Act, and soon to be amendments to the Resource Management Act 1991, or associated changes to national direction, including any transitional implications for this application.
- 2.4 This report has 17 appendices. The Technical memos have been prepared with advice from the Council staff and external consultants detailed in Table 2 below. Copies of the Technical expert memos are attached in the appendices.

Table 2 - Technical Experts and Reports

Appendix	Details	Author
1	Table of Recommendations	Collation of all Experts recommendations
2	Economics	Rodney Yeoman, Director, Formative
3	Transport	Joe Phillips Principal – Transport Advisory and Hayden Trumper Senior Associate Transportation Engineer, Beca
4	Transport	Shane Binder, Senior Transportation Engineer, WDC
5	Urban Design	Jane Rennie, Partner Urban Designer, Boffa Miskell
6	Landscape	Sue McManaway, Principal Landscape Architect, Boffa Miskell
7	Policy Planning	Mark Buckley, Principal Planner, WDC
8	Water Supply	Paul Reed, Principal - Civil Engineering, Beca
9	Wastewater	Paul Reed, Principal - Civil Engineering, Beca
10	Stormwater	Kate Purdon, Technical Director - Civil Engineering, Beca
11	Flooding	Greg Whyte, Managing Director DHI
12	Geotechnical	Marcus Gibson, Principal – Geotechnical Engineering, Beca
13	Ecology	Jade Christiansen, Eleanor Gunby and Roland Payne, Wildlands
14	Green House Gas	Andrew Murray, Beca
15	Contaminated Land	Hannah Mirabueno, Senior Scientist – Contaminated Land and Waste Science, Canterbury Regional Council
16	Parks and Reserves	Rachael Annan, Greenspace Planner, WDC
17	Arborist	Dylan Pederson Tree and Assets Contract Liaison, WDC
18	Solid Waste	Kitty Waghorn Solid Waste Asset Manager, WDC
19	Planning History	Andrew Willis, Consultant Planner

- 2.5 Alongside this report and the appendices, the Mayor and Councillors, and the Ōhoka Oxford Community Board have provided separate memorandums that should be read alongside Council's technical reports.

3. HISTORY

- 3.1 The application site has been the subject of two recent, substantially similar urban rezoning proposals: Private Plan Change 31 (RCP-031) to the former Waimakariri District Plan, and

submissions by Rolleston Industrial Developments Limited and Carter Group Property Limited on the Proposed Waimakariri District Plan and Variation 1. Both sought to enable a large residential development at Ōhoka, together with retirement housing, education or community activities, open space and a local commercial centre. A fuller chronology and schedule of the technical evidence considered in those processes has been provided by Mr Andrew Willis as Appendix 19.

- 3.2 RCP-031 was lodged in late 2021, revised in June 2022 and publicly notified in July 2022. It sought to rezone approximately 155.9 hectares at Mill and Bradleys Roads and enable approximately 800 households, education and retirement-housing activities, and a new commercial area. The proposal attracted substantial opposition, including concerns relating to productive land, flooding and drainage, three-waters servicing, transport, settlement character, greenhouse-gas emissions, development capacity and consistency with the strategic planning framework. Following hearings in August and September 2023, the Independent Hearings Panel recommended that RCP-031 be declined. Council adopted that recommendation on 5 December 2023, and the applicant appealed to the Environment Court which has now been withdrawn.
- 3.3 The subsequent Proposed District Plan and Variation 1 submissions sought a broadly comparable rezoning of the Ōhoka land to residential, commercial and open-space zones. Hearings were held during 2024, supported by extensive expert evidence and conferencing. The Independent Hearings Panel again recommended that the rezoning request be rejected. Council accepted that recommendation on 24 June 2025 and publicly notified its decisions on 14 July 2025. The matter has now appealed and is currently with the Environment Court on hold.
- 3.4 Across the Proposed District Plan process, there was broad agreement that the site is not subject to the National Policy Statement for Highly Productive Land; contamination and geotechnical matters could be addressed at subdivision stage; the outline development plan was internally well considered; adequate electricity and telecommunications could be provided; on-site flooding could be managed; and ecological enhancement could be achieved if development followed the outline development plan and expert recommendations.
- 3.5 The principal areas of disagreement were whether the proposal would contribute to a well-functioning urban environment; whether sufficient housing demand or need had been demonstrated at Ōhoka; whether the development would be well connected and accessible by public and active transport; the extent of effects on Ōhoka's character and amenity; greenhouse-gas implications; infrastructure integration and certainty; the adequacy of open-space provision; the scale of the commercial centre; and whether the proposal gave effect to the Canterbury Regional Policy Statement and aligned with the wider Greater Christchurch and Waimakariri growth strategies. The previous panels placed particular weight on the absence of demonstrated location-specific demand, the availability of sufficient development capacity elsewhere, weak connectivity to established centres and services, infrastructure uncertainty, and inconsistency with the planned settlement pattern.
- 3.6 The previous processes concerned rezoning proposals rather than the full subdivision and land-use consents now sought under the Fast-track Approvals Act 2024. Their technical assessments were therefore generally undertaken at a higher level, with some matters

expected to be resolved at later consent stages. Since those decisions, the Proposed District Plan has also become partially operative and additional urban rezonings have been confirmed. The earlier decisions and expert conferencing remain relevant to the strategic location, settlement-pattern, accessibility, demand and infrastructure issues raised by the present application, but findings on detailed effects and mitigation must be considered against the more developed design and technical information now before the Panel.

- 3.7 Overall, the development concept now before the Panel is materially the same as the proposals considered through the earlier rezoning processes which included similar number of houses, retirement village, polo field. The principal difference is the level of detail that should accompany the present application. Unlike a rezoning proposal, which establishes a planning framework and commonly leaves detailed design and effects matters to later consent stages, the substantive application under the Fast-track Approvals Act 2024 is seeking the resource consents needed to authorise the development. It should therefore provide sufficient site-specific design, assessment and technical information to enable the Panel to determine the actual and potential effects of the proposal.

4. SUMMARY OF TECHNICAL REVIEW

- 4.1 Council engaged a number of technical specialists to review the substantive application and supporting documentation. The reviews have informed the preparation of these comments and provide the technical basis for Council's overall planning position.
- 4.2 While each review focuses on a different technical discipline, a number of common themes emerge. In particular, concerns are consistently raised regarding the appropriateness of accommodating urban development of this scale in Ōhoka, the extent of departure from the established strategic growth framework, infrastructure certainty, environmental effects, and whether the proposal provides sufficient community facilities to support the scale of growth proposed.
- 4.3 The technical reviews identify a number of recurring themes which underpins my planning assessment. A summary of the technical reviews is set out in Table 3 below.

Table 3: Summary of Technical Reviews

Discipline	Key Findings	Planning Implications
Economics (Appendix 2)	The proposal would provide housing supply and economic benefits. However, the review concludes that much of the projected growth is likely to be redistributed from elsewhere within Greater Christchurch rather than being genuinely additional. The review also identifies potential infrastructure and servicing inefficiencies associated with development occurring outside planned growth areas, reducing the significance of the claimed regional benefits.	Benefits recognised, but likely overstated. Growth is expected to be largely redistributed from existing urban areas rather than genuinely additional, reducing the significance of the claimed regional benefits and potentially undermining the efficient sequencing of infrastructure and planned urban growth.
Transport (Appendices 3 and 4)	Significant transport upgrades are required to accommodate projected traffic volumes. Most transport effects are capable of mitigation, subject to infrastructure delivery and staging requirements.	While some transport effects may be technically capable of mitigation, the proposal's locational disadvantages, including its reliance on the wider transport network and private vehicle travel, cannot be fully mitigated. Furthermore, achieving acceptable transport outcomes relies on significant transport infrastructure upgrades that are proposed to be fully funded by the applicant and are dependent on future Council and/or NZTA funding decisions, creating implementation uncertainty and potentially diverting investment from other priority transport projects. The transport infrastructure required to mitigate the effects of the proposal should be funded by the applicant.
Urban Design (Appendix 5)	The proposal is considered to function as a substantial new settlement rather than a logical extension of Ōhoka.	Raises concerns regarding consistency with the NPS-UD and achievement of quality urban form outcomes.

	Concerns are raised regarding accessibility, connectivity, walkability, public transport, and whether the proposal achieves a well-functioning urban environment.	
Landscape (Appendix 6)	Urbanisation of the site would result in a significant and permanent change to the rural landscape and alter the relationship between Ōhoka and its surrounding rural setting. Residual landscape effects remain despite mitigation.	Significant weight is attributed to landscape and rural character effects.
Policy Planning (Appendix 7)	The proposal is inconsistent with the Greater Christchurch Spatial Plan, Canterbury Regional Policy Statement and District Plan growth framework. Existing planned growth areas provide significant housing capacity.	Raises fundamental concerns regarding settlement pattern, strategic planning, and whether the proposal is justified in an unplanned growth location.
Water Supply (Appendix 8)	Long-term water supply has not yet been demonstrated. Outstanding matters include bore yield, water quality, treatment requirements, storage requirements and network resilience.	Creates uncertainty regarding the provision of reliable long term drinking water and whether sufficient space has been incorporated into the scheme plan to accommodate the infrastructure necessary to service the development. ability of the development to be serviced by reliable long-term drinking water infrastructure.
Wastewater (Appendix 9)	Significant uncertainty remains regarding the proposed wastewater servicing strategy, and Council is not satisfied that a robust long-term solution has been demonstrated.	Wastewater servicing remains an unresolved issue. While potentially capable of resolution, the proposal currently relies on further investigation and alternative servicing solutions. This creates uncertainty regarding the feasibility and appropriateness of accommodating development of this scale at Ōhoka.

• Stormwater (Appendix 10)	• The proposed stormwater system and stormwater management area footprints have not yet been demonstrated to achieve the required levels of service or appropriately mitigate off-site effects. Further hydraulic modelling and design development are required.	• Stormwater effects remain unresolved due to outstanding modelling design and groundwater uncertainties creating doubt as to the long term effectiveness and performance of the proposed stormwater system.
• Flooding (Appendix 11)	• The updated flood modelling represents an improvement over previous assessments; however, hydraulic neutrality has not yet been demonstrated. Uncertainty remains regarding downstream effects, stormwater management performance and drainage network capacity.	• Flooding effects are not considered resolved and require further modelling, assessment and condition development.
• Geotechnical (Appendix 12)	• Further geotechnical investigations are required to confirm the site's suitability for development and to address outstanding geotechnical uncertainties.	• While potentially resolvable, the current information does not provide sufficient certainty regarding the site's geotechnical suitability for development at the proposed scale.
• Ecology (Appendix 13)	• Concerns remain regarding wetland loss, ecological significance assessments, avifauna, lizard habitat, offsetting proposals and natural character effects. Additional information and refined mitigation measures are recommended.	• Ecological effects remain partly unresolved and require further assessment and conditions.
• Greenhouse Gas (Appendix 14)	• The proposal is likely to generate substantially greater transport-related greenhouse gas emissions than the existing land use. Equivalent development within planned growth	• Reinforces concerns regarding settlement pattern, accessibility, transport integration and long-term reliance on private vehicle travel.

	areas would likely produce lower transport emissions because of better proximity to employment, services and existing urban infrastructure.	
• Contaminated Land (Appendix 15)	• A Remedial Action Plan and soil management plan have not been provided despite the proposal involving remediation, excavation, soil reuse and imported fill. Further information is required to address farm-dump areas and potential infilled waterways, remediation staging, soil handling and protection of human health, groundwater and surface water.	• A material information gap that is potentially resolvable through approved remediation and soil management plans and enforceable conditions, with key objectives and protective criteria established before consent is granted.
• Recreation and Reserves (Appendix 16)	• The proposal does not provide adequate neighbourhood-scale reserve areas. A shortfall of approximately 2.5ha of neighbourhood park provision has been identified. Ecological corridors and stormwater areas do not provide the same function as neighbourhood parks.	• Raises concerns regarding social wellbeing, community infrastructure and whether the development adequately caters for the future population it will generate.
• Arborist (Appendix 17)	• The street tree and vegetation review identifies concerns regarding species suitability, available rooting space and conflicts between mature trees, parking areas, roads, swales and stormwater infrastructure. Further refinement of species selection, planting design and infrastructure integration is recommended.	• Potentially resolvable through amended plans and conditions requiring a revised street tree and vegetation strategy, including appropriate long-term maintenance arrangements.

• Solid Waste (Appendix 18)	• The review identifies shortcomings in the proposed layout for waste collection servicing. Insufficient provision has been made for bin placement in several locations, and further evidence is required to demonstrate that collection vehicles can safely and efficiently access the site	• Creates uncertainty regarding the ability of the development to be effectively serviced by Council's waste collection network without further design changes and supporting evidence. Additional redesign work and waste management planning are required to address identified servicing constraints.
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- 4.4 The primary issue that arises from the technical reviews is not the ability to mitigate individual effects in isolation. Rather, the reviews collectively raise questions regarding whether a development of this scale is appropriately located in Ōhoka and whether the resulting outcomes justify a significant departure from the established strategic planning framework.
- 4.5 While the proposal would provide housing supply and investment benefits, the reviews identify ongoing concerns relating to:
- a) Strategic growth management and settlement pattern;
 - b) Achievement of a well-functioning urban environment;
 - c) Infrastructure delivery and servicing certainty;
 - d) Flooding and stormwater management;
 - e) Water supply resilience;
 - f) Landscape and rural character effects; and
 - g) Adequacy of community infrastructure and recreational provision.
 - h) Meeting the purpose of the FTAA, being a regionally significant development
 - i) Cumulative impacts from the proposal.
- 4.6 These matters are discussed in greater detail in the assessment sections that follow and collectively inform my overall recommendation to the Expert Panel.

5. FUNDAMENTAL PLANNING ISSUE

Strategic Planning, Settlement Pattern, Housing Need and Well-Functioning Urban Environment

- 5.1 The principal issue arising from the proposal is whether a substantial new urban community at Ōhoka represents an appropriate location and scale of growth having regard to the established strategic planning framework for Greater Christchurch and the Waimakariri District, and whether the benefits of doing so justify a departure from that framework.
- 5.2 This issue attracts significant weight because, unlike matters such as landscaping, ecological mitigation, transport design or engineering upgrades, the strategic planning concerns identified by Council's experts relate to the fundamental appropriateness of accommodating a substantial new urban population at Ōhoka. These matters cannot readily be resolved through conditions or management plans.
- 5.3 Council's policy planning, urban design, landscape and economic experts (Appendices 7, 5, 6 and 2 respectively) consistently conclude that the proposal would establish a substantial new urban settlement rather than a logical extension of Ōhoka. Their evidence identifies concerns regarding settlement pattern, housing need, urban form, infrastructure servicing and consistency with the established growth framework.
- 5.4 Council's strategic planning advisor, Mr Mark Buckley WDC (Appendix 7), concludes that the proposal has not demonstrated that urban development of this scale is appropriate in Ōhoka or aligned with the planned settlement pattern established through the Greater Christchurch growth framework and the Partially Operative Waimakariri District Plan. His

review identifies concerns regarding the strategic justification for the scale and location of growth proposed, and whether the resulting benefits are of sufficient regional significance to outweigh the policy, infrastructure and planning issues arising from departure from the District Plan, recent growth planning exercises and the Greater Christchurch Spatial Plan.

- 5.5 Mr Buckley's assessment notes that existing plan-enabled residential development capacity within the district substantially exceeds forecast demand and concludes there is already sufficient capacity within planned urban areas to accommodate projected growth.
- 5.6 Similar conclusions are reached by Ms Jane Rennie of Boffa Miskell (Appendix 5), who considers that the proposal would effectively establish a substantial new urban neighbourhood that would materially alter Ōhoka's role and function within the wider settlement hierarchy. She concludes that the site has not been identified as a preferred growth location and raises concerns regarding accessibility, public transport integration, private vehicle dependence and urban efficiency.
- 5.7 Ms Sue McManaway of Boffa Miskell (Appendix 6) likewise disputes the characterisation of the proposal as a simple extension of Ōhoka. She concludes that the development would be more accurately described as a substantial new settlement that would become the dominant component of the community and permanently alter the scale, character and rural setting of Ōhoka.
- 5.8 The economic evidence of Mr Rodney Yeoman of Formative (Appendix 2) reinforces these conclusions. While acknowledging that the proposal would generate construction activity, residential development and associated expenditure, he concludes that many of the claimed benefits are redistributive rather than additional. In his view, future residents are likely to be drawn from elsewhere within Greater Christchurch rather than representing significant net population growth.
- 5.9 Mr Yeoman further concludes that sufficient commercially feasible and realisable residential development capacity already exists within Waimakariri District and Greater Christchurch to accommodate forecast growth.
- 5.10 I acknowledge that the proposal would provide additional housing supply, housing choice, local amenities and economic activity. These are positive outcomes and attract weight in the context of the Fast-track Approvals Act 2024. However, the key issue is not whether additional housing should be provided, but whether growth of this scale should occur in this location and if the costs outweigh the benefits.
- 5.11 I also place significant weight on the fact that Council has recently considered growth and urban expansion in this location through both the Plan Change 31 process and the Proposed District Plan process as shown in Appendix 19 and in section 3 of this report. Those processes involved detailed assessments of housing demand, infrastructure capacity, urban form and settlement planning outcomes and ultimately provided sufficient land to accommodate projected growth within identified urban areas.
- 5.12 Importantly, the findings of those planning processes were that Ōhoka is not an appropriate location for urban growth of the scale now proposed. Concerns were identified regarding accessibility, urban efficiency, infrastructure integration and achievement of a well-

functioning urban environment, many of which remain relevant to the current application.

- 5.13 While individual technical matters may be capable of mitigation, the proposal requires substantial transport and infrastructure investment to enable development of the scale proposed. Council's transport, wastewater, stormwater and water supply experts identify a range of upgrades, investigations and servicing interventions necessary to accommodate the proposed urban population. In my view, these requirements are not simply engineering matters to be resolved but are relevant indicators of the suitability of the location for urban growth.
- 5.14 However, the significance of these infrastructure requirements extends beyond the ability to mitigate individual effects. Rather, the scale and extent of the necessary interventions are relevant to the broader assessment of whether Ōhoka represents an appropriate and efficient location for urban expansion of this scale. In this context, the technical evidence provides important insight into the constraints associated with accommodating growth at this location and the degree to which the proposal relies on substantial infrastructure investment to support an urban form that is largely detached from existing urban centres.
- 5.15 In relation to transport, the evidence identifies the need for significant network upgrades to accommodate forecast traffic demands generated by the proposal. While many transport effects may ultimately be mitigated through infrastructure upgrades and funding contributions, the development would remain heavily reliant on private vehicle travel for access to major employment areas, higher-order retail centres, health services and community facilities. Public transport provision remains limited and the site's separation from established urban centres raises ongoing concerns regarding accessibility, connectivity and urban efficiency.
- 5.16 Council's infrastructure experts have also identified concerns regarding wastewater servicing, water supply and stormwater management. While solutions may ultimately be available, substantial further work is required before Council can be satisfied that long-term servicing can be achieved in an efficient, integrated and resilient manner. The evidence indicates that significant infrastructure intervention is required to support urban growth at this location and reinforces concerns regarding the appropriateness of accommodating development of this scale outside planned growth areas.
- 5.17 I consider these matters particularly relevant because Council has recently undertaken growth planning and rezoning processes that deliberately directed future urban growth toward locations where infrastructure investment, transport networks and community services could be coordinated and efficiently provided. By contrast, the current proposal seeks to establish a substantial new urban community in a location where significant servicing and transport interventions are necessary before development can occur.
- 5.18 The greenhouse gas evidence by Andrew Murray of Beca Limited further supports these concerns. It concludes that the proposal is likely to generate higher transport-related greenhouse gas emissions than equivalent development occurring within existing planned growth areas due to its location, travel patterns and reliance on private vehicle travel. This finding reinforces concerns regarding accessibility, travel demand and the efficiency of the proposed urban form.

5.19 The evidence before me demonstrates that:

- a) Ōhoka is not identified as a preferred growth location within the strategic planning framework;
- b) Council has recently undertaken district-wide growth planning and rezoned sufficient land to accommodate projected demand;
- c) The economic evidence does not demonstrate that the proposal would deliver regionally significant benefits sufficient to justify unplanned urban expansion.
- d) The proposal would establish a substantial new settlement rather than a logical extension of Ōhoka;
- e) Significant transport upgrades are required to accommodate growth;
- f) Further work is required to resolve wastewater, stormwater and water supply servicing matters;
- g) Access to major employment areas, services and public transport remains limited relative to planned urban growth locations; and
- h) The proposal would remain heavily reliant on private vehicle travel.

5.20 Having considered the evidence as a whole, I am not satisfied that the proposal has demonstrated a strategic need or justification for urban development of this scale at Ōhoka. While the proposal would deliver housing and economic benefits, those benefits must be weighed against its inconsistency with the planned settlement pattern, the significant transport and infrastructure investment required to facilitate development, concerns regarding achievement of a well-functioning urban environment, and the resulting effects on the scale, character and function of Ōhoka.

5.21 In my opinion, the strategic planning, transport, infrastructure, urban design, economic and landscape evidence all point to the same conclusion. The proposal represents substantial urban growth in a location that has not been planned, serviced or identified for development of this scale. When considered cumulatively, the need for significant infrastructure intervention, ongoing transport and accessibility concerns, the absence of a demonstrated housing need, and the effects on the role and function of Ōhoka weigh heavily against the proposal. These matters attract significant weight in the overall planning balance and weight and I consider the cumulative impacts to outweigh the benefits.

5.22 Further assessment of the transport, infrastructure, landscape, urban design, economic, ecological and other technical matters discussed above is contained within the relevant sections of this report and the specialist reviews attached as appendices. Those assessments support and inform the conclusions reached in this section and should be read in conjunction with this overall planning analysis.

6. SIGNIFICANT ISSUES

Transport

6.1 have considered the transport reviews prepared by Mr Binder WDC (Appendix 3) together with the review undertaken Mr Phillips and Mr Trumper of Beca (Appendix 4).

- 6.2 The transport evidence indicates that the proposal would generate a substantial increase in traffic demand and require significant upgrades to the surrounding transport network. The reviews generally conclude that direct traffic and safety effects are capable of mitigation through road and intersection upgrades, active transport infrastructure, staging requirements and other transport interventions.
- 6.3 However, while many direct transport effects may be capable of management from an engineering perspective, the evidence reinforces broader concerns regarding the location and form of the development. The majority of employment opportunities, health services, education facilities and commercial activities would continue to be located outside Ōhoka. Consequently, future residents are expected to remain heavily reliant on private vehicle travel and the wider transport network to meet many day-to-day needs. The review undertaken by Mr Binder similarly concludes that the proposal would not result in a well-connected urban environment and identifies concerns regarding accessibility to employment, services, public transport and active transport networks
- 6.4 In my view, the primary issue is not whether infrastructure upgrades can achieve acceptable operational outcomes, but whether the proposal promotes the integrated land use and transport outcomes anticipated by the strategic planning framework and the NPS-UD. The evidence indicates that substantial transport investment is required to support development in a location that remains relatively disconnected from major employment, service and public transport destinations.
- 6.5 I also consider it essential that any transport infrastructure and mitigation measures required as a consequence of the development are funded and delivered by the applicant and linked to development staging. If Council funding were instead sought, that would remain subject to future Council decision-making under the Local Government Act 2002 and could require reprioritisation of the capital programme, diverting investment from other critical transport projects and growth locations that can be serviced more efficiently. Existing ratepayers should not bear the costs of infrastructure required to enable the proposal.
- 6.6 Accordingly, while many direct transport effects may be capable of mitigation, the transport evidence does not overcome my concerns regarding the efficiency of the proposed development pattern, its reliance on private vehicle travel, and the appropriateness of accommodating urban growth of this scale at Ōhoka.

Flooding and Stormwater

- 6.7 Flooding and stormwater management is a significant issue given the scale of development, existing catchment hazards, high groundwater and potential downstream effects.
- 6.8 I have considered the reviews by Ms Kate Purdon of Beca Limited and Mr Greg Whyte of DHI (Appendices 10 and 11). The applicant proposes an integrated system of attenuation, treatment, waterways, swales and pipes to manage runoff and flood risk.
- 6.9 Both reviewers acknowledge the substantial work undertaken but identify unresolved matters requiring further assessment.

- 6.10 These include hydraulic modelling and neutrality, attenuation, groundwater interaction, downstream capacity and effects, system performance, and whether sufficient space has been allowed for the required infrastructure within the proposed scheme plan. Uncertainty about groundwater interaction could lead to ineffective system performance and ongoing operational and maintenance issues. Further work is needed to demonstrate the required levels of service and that catchment flood risk will not increase.
- 6.11 Although detailed engineering commonly follows consent, the Panel must have sufficient certainty now that runoff can be managed without transferring flood risk downstream. In addition, any changes to the stormwater system may require alterations to the scheme plan which would need to be resolved prior to consent being granted.
- 6.12 Further, it is noted that the Ohoka-Mandeville area has experienced repeated flooding resulting from rainfall-generated surface water, groundwater resurgence and constrained drainage paths. Significant flooding events in 2014, 2017, 2021 and 2022 demonstrate the vulnerability of the existing system to both short-duration surface flooding and prolonged ponding. These issues arise from a combination of factors, including the flat topography of the catchment, interrupted overland flow paths, groundwater resurgence, limited downstream capacity and existing drainage network constraints.
- 6.13 The drainage path ultimately discharges via the No. 10 Road drainage network to the Ohoka Stream system. In recognition of these existing issues, Council has committed approximately \$24 million through its 2024-2034 Long Term Plan to the Mandeville Resurgence Channel programme, including channel upgrades and a proposed diversion to the Eyre River to reduce flood risk in the Ohoka and Mandeville area.
- 6.14 In my view, these existing flooding and drainage constraints reinforce the need for a high degree of confidence that additional stormwater generated by the proposal can be effectively managed without compromising the performance of the wider drainage network or increasing flood risk, particularly given the unresolved uncertainties regarding groundwater interaction and stormwater system performance.
- 6.15 Overall, further assessment, design refinement, hydraulic verification and robust conditions are required. Flooding and stormwater therefore remain outstanding issues. In particular, conditions cannot adequately cure the present uncertainty about groundwater interaction, system performance and the operational and maintenance consequences. Any resulting design changes may alter the stormwater infrastructure footprint and scheme plan and therefore need to be resolved prior to the consent being granted if the panel decide too.

Water Supply

- 6.16 A key issue arising from the proposal is whether a reliable, sustainable and appropriately resilient potable water supply can be provided to support the scale of development proposed. Unlike development within established growth areas, the proposal relies on a new groundwater supply system that must meet average day and peak demand, including firefighting requirements, while maintaining long-term operational resilience.
- 6.17 Council's water supply reviewer, Mr Paul Reed of Beca Limited (Appendix 8), acknowledges

that the applicant has identified potential groundwater source areas and proposed abstraction, treatment, storage and distribution infrastructure. While indicative bore locations are shown on the scheme plan, the groundwater resource has not been adequately proven through bore drilling and testing. Further work is required to demonstrate long-term sustainable yield, borefield performance under operational demand, water quality and treatment requirements, reservoir and pumping capacity, firefighting supply, cumulative abstraction effects, and the resilience and security of supply for both initial and ultimate development demand.

- 6.18 The issue is not whether a groundwater-based solution may ultimately be achievable, but whether the applicant has demonstrated with sufficient certainty that a viable and sustainable water source exists and can be delivered for a community of the scale proposed. Important assumptions remain dependent on future testing, investigation and detailed design, and the evidence does not yet provide confidence in the system's long-term performance.
- 6.19 This uncertainty is particularly significant because the proposed water supply infrastructure is intended to vest in Council. Council would then assume ownership, operational and maintenance obligations, and long-term risk. On the information presently available, Council cannot determine that the infrastructure would be suitable for vesting, and it would be inappropriate to approve vesting while key servicing assumptions and long-term performance remain unresolved.
- 6.20 Water supply is essential infrastructure for residential development, retirement living, commercial activities, firefighting and public health. Conditions may appropriately control the detailed design, construction and implementation of a proven supply network, but they cannot establish a water source that has not been demonstrated. The present uncertainty therefore goes to the fundamental feasibility of servicing the development rather than merely to engineering refinement.
- 6.21 Given the scale and lifespan of the proposed development, a greater degree of certainty is required before approval could be granted. I therefore conclude that the proposal has not adequately demonstrated that a reliable and sustainable water supply can be provided for the full development.

Wastewater

- 6.22 Council engaged Mr Paul Reed of Beca Limited to undertake an independent review of the applicant's wastewater assessment (Appendix 9).
- 6.23 Mr Reed concludes that the wastewater servicing strategy proposed by the applicant is not currently supported and identifies significant concerns regarding network capacity, wastewater flows, infrastructure resilience and the preferred point of connection. Of particular significance is his conclusion that the existing Bradleys Road Pump Station network is not suitable for servicing the scale of development proposed and that an alternative servicing solution is required.
- 6.24 Mr Reed's review also identifies several outstanding matters requiring further investigation and confirmation, including wastewater flows, gravity reticulation options, emergency

storage, network resilience and the final point of connection.

- 6.25 Importantly, Council's asset management and three waters staff strongly support a connection to the Kaiapoi wastewater network rather than the Rangiora wastewater system. This reflects concerns that existing and planned growth within Rangiora has already been incorporated into Council's infrastructure planning and that available wastewater capacity should be retained for growth anticipated through the District Plan framework for the Rangiora catchment.
- 6.26 In my opinion, the significance of the review is not the detailed engineering matters themselves but the fact that a fully supported long-term wastewater servicing solution has not yet been demonstrated. While these issues may ultimately be capable of resolution, the current proposal does not provide sufficient certainty regarding wastewater servicing and this weighs against the proposal from an infrastructure and planning perspective.

Landscape and Rural Character

- 6.27 The landscape and rural character effects of the proposal are a key issue in the assessment of this application. While the proposal is described by the applicant as an extension of Ōhoka, the landscape review concludes that it is more appropriately characterised as a substantial new urban settlement that would fundamentally alter the scale, identity and character of the existing settlement.
- 6.28 This issue is significant because the effects extend beyond the visual appearance of the development itself. Rather, they relate to the permanent transformation of a large area of open rural land into an urban environment and the resulting change in the relationship between Ōhoka and its surrounding rural setting.
- 6.29 The landscape review undertaken by Ms McManaway of Boffa Miskell (Appendix 6) concludes that the proposal would result in a substantial increase in the settlement footprint and would materially alter the existing landscape character of the locality. The review does not support the characterisation of the proposal as a modest extension to the existing village and instead concludes that the development would become the dominant component of the settlement.
- 6.30 Particular weight is placed on the finding that the residential component of the proposal covers approximately 77 hectares and is significantly larger than the existing Settlement Zone. In landscape terms, the proposal would replace a substantial area of productive rural land with urban development, resulting in a permanent change to the character and appearance of the site and its surrounds.
- 6.31 The review also identifies concerns regarding the effectiveness of proposed landscape mitigation. While extensive planting, green corridors and landscape buffers are proposed, these measures primarily mitigate visual effects over time. They do not avoid the underlying change from a rural landscape to an urban environment. Consequently, even after mitigation planting matures, the fundamental change to landscape character and settlement form would remain.
- 6.32 In my opinion, this distinction is important. Landscape mitigation may soften the appearance

of development and reduce visual effects experienced by neighbouring properties. However, it does not alter the fact that the proposal would establish a substantial new urban settlement in a presently rural location.

6.33 I also consider the landscape evidence to be important because it reinforces the conclusions reached by both the policy and urban design reviews. While approaching the proposal from a different discipline, the landscape review reaches a similar conclusion that the proposal represents a significant departure from the existing settlement pattern and would materially change Ōhoka's role and identity within the wider landscape.

6.34 The supporting evidence of Ms McManaway indicates that:

- a) The proposal would permanently urbanise a substantial area of rural land;
- b) The proposal would materially alter the existing character and identity of Ōhoka;
- c) The development would become the dominant element of the settlement;
- d) The relationship between Ōhoka and its surrounding rural environment would be fundamentally changed;
- e) Landscape mitigation may reduce visual effects but cannot avoid the underlying landscape transformation; and
- f) The landscape evidence supports the broader conclusion that the proposal is more appropriately characterised as a substantial new settlement rather than a logical extension of the existing village.

6.35 Accordingly, I conclude that the proposal would result in significant and permanent landscape and rural character change. These effects attract considerable weight in the overall assessment and support the broader concerns regarding settlement pattern, strategic planning and the appropriateness of accommodating urban growth of this scale at Ōhoka.

Recreation and Community Infrastructure

6.36 A significant impact arising from the proposal is whether sufficient open space, recreation facilities and community infrastructure are provided to support the future population generated by the development.

6.37 While the proposal includes a substantial green-blue network, ecological corridors, stormwater areas, landscape buffers and active transport connections, the relevant planning question is whether these spaces provide the type, quality and quantity of recreation opportunities anticipated for a community of approximately 2,400-2,500 residents.

6.38 This issue is particularly important given the applicant's reliance on the proposition that the proposal is a regionally significant development. If a proposal is to be afforded the benefits associated with the Fast-track Approvals Act on this basis, it is reasonable to expect that it will provide community infrastructure and recreation opportunities commensurate with the scale of development proposed.

6.39 Council's recreation review prepared by Ms Rachael Annan, WDC, concludes that the

proposal does not adequately provide neighbourhood-scale recreation reserves capable of meeting the needs of future residents.

- 6.40 The review estimates that the development would generate a population of approximately 2,465 residents and identifies a requirement for approximately 2.5 hectares of neighbourhood park provision in accordance with Council's recreation planning framework and levels of service.
- 6.41 A central finding of the review is that a number of the open spaces relied upon by the applicant do not perform the function of neighbourhood recreation reserves. Instead, these areas principally comprise:
- a) Ecological corridors;
 - b) Stormwater management areas;
 - c) Shared path corridors;
 - d) Landscape buffers;
 - e) Esplanade areas; and
 - f) Privately managed open spaces.
- 6.42 While these spaces contribute positively to ecological, stormwater, landscape and amenity outcomes, the review concludes they should not be treated as substitutes for dedicated neighbourhood parks.
- 6.43 The review further concludes that none of the proposed reserve spaces adequately performs the role of a neighbourhood park capable of meeting the day-to-day recreation needs of future residents. As a result, the proposal effectively relies upon existing facilities, particularly Ōhoka Domain, to accommodate a significant proportion of future recreation demand.
- 6.44 Importantly, the review distinguishes between passive open space, ecological space and functional recreation space. While the development contains a considerable amount of open land, much of that land is constrained by alternative purposes and therefore cannot reasonably be expected to function as neighbourhood recreation reserve.
- 6.45 The review also considers the role of the proposed privately managed recreation land, including the polo field and associated open space areas. While these spaces may provide recreational and amenity benefits, they do not provide the same level of certainty, public accessibility or long-term community benefit as publicly owned and managed neighbourhood reserves. Their primary function differs from that of a neighbourhood park and their availability to the wider community may be subject to management, operational or ownership constraints.
- 6.46 In my view, the proposed privately managed recreation land should not be regarded as a direct substitute for dedicated public neighbourhood reserve provision. While these areas contribute positively to the overall amenity and character of the development, they do not provide an equivalent level of service to future residents and do not adequately address the identified shortfall in neighbourhood park provision.
- 6.47 I accept that the proposal incorporates a substantial network of open space and that this delivers some positive outcomes.

- 6.48 However, I also accept the conclusions of Ms Annan that these spaces should not be conflated with neighbourhood recreation reserves.
- 6.49 In my opinion, the critical issue is whether future residents will have access to high-quality local parks capable of supporting informal recreation, children's play, neighbourhood interaction, passive recreation and community wellbeing.
- 6.50 Ms Annan evidence demonstrates that a shortfall remains in neighbourhood reserve provision and that the proposal relies heavily on spaces designed primarily for ecological, landscape, drainage or movement functions to meet recreation outcomes.
- 6.51 While those spaces provide amenity value, they do not provide the same function as dedicated neighbourhood parks.
- 6.52 I also attribute weight to the finding that the proposal relies on existing facilities, including Ōhoka Domain, to meet recreation demand generated by the development.
- 6.53 In planning terms, I consider it inappropriate that an existing public facility should be expected to absorb the recreation needs of a proposal that the applicant asserts is a "regionally significant development". The consequence is that part of the recreation burden generated by the development is effectively transferred to existing community infrastructure. In addition, I am not satisfied that the proposal adequately demonstrates how the wider community service needs of future residents will be met.

7. ADDITIONAL PLANNING CONSIDERATIONS

Ecology

- 7.1 Ms Jade Christiansen, Ms Eleanor Gunby and Mr Roland Payne of Wildlands undertook an ecological peer review of the proposal (Appendix 13). The review identifies a number of information gaps relating to lizards, avifauna and wetlands and concludes that additional assessment is required to fully understand the significance of effects and the suitability of proposed mitigation measures. Particular concerns relate to wetland values and offsetting, avifauna use of the site, and the adequacy of information available to assess effects on indigenous lizards. The review concludes that ecological effects are likely capable of being managed through further assessment, refinement of mitigation measures and appropriate consent conditions.

Cultural

- 7.2 Cultural effects are relevant to the assessment of the proposal. However, I recognise that mana whenua are best placed to assess effects on cultural values and have been invited to provide comments directly to the Panel.

Geotechnical

- 7.3 Mr Marcus Gibson of Beca Limited undertook a geotechnical review of the proposal (Appendix 12). The review concludes that the site is generally capable of being developed from a geotechnical perspective. However, the review identifies uncertainty regarding liquefaction vulnerability and recommends additional deep geotechnical investigations and a quantitative liquefaction assessment before the geotechnical risk can be fully understood. The review concludes that geotechnical risks are likely capable of being managed through detailed design, further investigation and appropriate conditions

Contaminated Land

- 7.4 The contaminated land matters were reviewed by Ms Hannah Mirabueno, Senior Scientist Contaminated Land and Waste Science at Canterbury Regional Council (Appendix 15). Her review identifies significant outstanding information requirements. In particular, a Remedial Action Plan and soil management plan have not been provided, despite the proposal involving remediation, excavation, soil reuse and imported fill. These documents are required upfront to address the investigation and remediation of farm-dump areas and potential infilled waterways; staging and sequencing of remediation; soil reuse, testing, importation and disposal procedures; and protection of human health, groundwater and surface-water receptors.
- 7.5 In planning terms, contaminated land remains a material information gap. The matters may be capable of management through a suitably detailed and approved Remedial Action Plan, soil management plan and enforceable conditions, but the key remediation objectives, soil-handling methodology and criteria protective of groundwater and surface water should be established before consent is granted. A potential benefit is the remediation of existing contamination and reduced disposal to landfill, provided soil is demonstrated to be suitable for reuse and placed where it will not adversely affect human health or the environment.

Greenhouse Gas Emissions

- 7.6 Council engaged Mr Andrew Murray of Beca Limited to undertake a technical review of the applicant's greenhouse gas assessment (Appendix 14).
- 7.7 Mr Murray concludes that the applicant's assessment is based on assumptions regarding future growth patterns that are not supported by the available evidence. In particular, he considers that the relevant comparison is not between the proposal and the existing agricultural use of the site, but between the proposal and equivalent urban development occurring within existing planned growth locations.
- 7.8 The review concludes that the proposal would generate substantially greater transport-related greenhouse gas emissions than the existing land use and that development of equivalent scale within identified growth areas such as Rangiora, Kaiapoi, Pegasus and Woodend would likely result in lower transport emissions due to their closer proximity to employment, services and existing urban infrastructure.
- 7.9 Mr Murray therefore concludes that the proposal is unlikely to support reductions in

greenhouse gas emissions and does not support the applicant's position that the development is consistent with the greenhouse gas reduction outcomes anticipated by the NPS-UD.

- 7.10 While greenhouse gas emissions are not a primary issue determining my recommendation, I agree that the findings reinforce broader concerns regarding settlement pattern, accessibility, transport integration and long-term reliance on private vehicle travel.

Productive Rural Land

- 7.11 The proposal would also result in the permanent loss of a substantial area of productive rural land. While I acknowledge the site is not identified as Highly Productive Land under the National Policy Statement for Highly Productive Land, the land currently contributes to the rural productive resource and forms part of the wider rural landscape surrounding Ōhoka. The urbanisation of the site would permanently remove that land from rural production and further reduce the distinction between the existing settlement and its rural surroundings. While I attribute only limited weight to this matter, I consider it contributes to the cumulative impact of the proposal and that the proposal represents an inappropriate expansion of urban development into a rural environment.

Commercial Centre, Polo Field and Retirement Village

- 7.12 The proposal includes a neighbourhood commercial centre, a polo field and a retirement village. These components are relied upon by the applicant as contributing to the overall benefits of the proposal, including housing choice, local services, recreation opportunities and community amenity.
- 7.13 However, there is limited information available regarding the detailed design, scale, operation and future implementation of these activities.

Commercial Centre

- 7.14 The applicant places reliance on the proposed commercial centre as a contributor to local employment, community wellbeing, accessibility to services and the creation of a more self-sufficient community.
- 7.15 I acknowledge that some level of neighbourhood-scale commercial activity has the potential to provide positive outcomes for future residents and contribute to local convenience. However, the evidence of Ms Jane Rennie, Mr Rodney Yeoman and Ms Rachael Annan raises questions regarding the extent to which these benefits can currently be relied upon.
- 7.16 Ms Rennie's urban design review identifies the village centre as an important component of the applicant's argument that the proposal will achieve a well-functioning urban environment. However, she notes that the nature, scale and function of the centre remain uncertain and that the proposed controls do not provide sufficient certainty regarding the form of development that may ultimately occur. In particular, the review questions the extent to which the centre can be relied upon to provide the services and level of activity necessary to reduce reliance on Rangiora, Kaiapoi and Christchurch.

- 7.17 Similarly, Mr Yeoman's economic assessment raises concerns regarding whether the scale of commercial development proposed is proportionate to the likely catchment population and whether the centre would generate genuinely additional economic activity rather than redistributing expenditure from existing centres.
- 7.18 I also note that the proposal is located in proximity to the existing commercial and business activities in Mandeville (3.5km away), together with the established commercial centres in Rangiora (7km) and Kaiapoi (9km). Consequently, the evidence does not clearly demonstrate that a commercial centre of the scale proposed is required to address an identified shortage of commercial land or services. Rather, there is a reasonable prospect that the centre could compete with, or redistribute activity from, existing centres and business areas already serving the surrounding catchment.
- 7.19 Ms Annan similarly notes there is no certainty regarding the nature of the services that may ultimately establish within the centre. While the applicant relies on the centre as supporting a complete community, there is no assurance that medical, professional, community or other higher-order services will be delivered. As a consequence, many of the social and community benefits relied upon by the applicant remain dependent on future commercial decisions rather than outcomes secured through the current application.
- 7.20 In my opinion, there is a significant distinction between the proposal providing an opportunity for commercial activities to establish and demonstrating that those activities will in fact occur in a manner that delivers the claimed benefits. While some level of commercial activity may ultimately be appropriate and beneficial, the evidence before me does not demonstrate with sufficient certainty the scale, timing or range of services that will be provided. Accordingly, I consider limited weight should be attributed to the claimed benefits associated with future commercial provision.
- 7.21 Accordingly, I consider the benefits of the proposed commercial centre to be overstated and attribute only limited weight to it in the overall planning assessment.

Polo Field

- 7.22 The proposed polo field is presented as a significant amenity, recreation and placemaking feature of the development. However, the evidence before me indicates that there remains considerable uncertainty regarding both the future form of the activity, the benefits that can reasonably be attributed to it and assurance of ongoing public access for recreation purposes to a privately owned facility.
- 7.23 Ms Annan notes that the polo field is proposed within a later development stage and remains subject to future approvals. I agree it likely will require separate resource consents to undertake the construction and events.
- 7.24 She further concludes that the area should not be relied upon to address neighbourhood recreation needs and raises concerns regarding the compatibility of public recreation facilities, including children's play spaces, alongside an operational polo facility.
- 7.25 In addition, the proposal provides limited information regarding the operation of the activity itself. There is insufficient detail regarding spectator facilities, associated buildings and

structures, event frequency, traffic generation, parking demand, lighting, noise and operational management.

- 7.26 The uncertainty identified by Ms Rennie regarding the delivery of community infrastructure and activity nodes is also relevant. Her review notes that a number of the community benefits relied upon by the applicant are not secured through sufficiently detailed controls or implementation mechanisms. In my view, the polo field is an example of this broader concern.
- 7.27 Importantly, the future relationship between the polo field and surrounding residential development has not been comprehensively assessed. The potential for reverse sensitivity effects remains unclear. Depending on the scale of operations, the activity may generate noise, traffic, events, safety and other effects that could create tension with adjoining residential development.
- 7.28 Given the lack of certainty regarding the future form and operation of the activity, I do not consider significant weight can be attached to the claimed recreation and amenity benefits of the polo field.

Retirement Village

- 7.29 The applicant relies upon the retirement village as a contributor to housing choice and demographic diversity within the District.
- 7.30 I acknowledge that retirement living can provide positive social outcomes and may contribute toward meeting the needs of an ageing population. However, both the economic and urban design evidence indicate that limited information has been provided regarding the future form, scale and delivery of the retirement village.
- 7.31 Mr Yeoman's assessment raises questions regarding whether the scale of retirement village development anticipated by the proposal is proportionate to likely market demand. This creates uncertainty regarding the extent to which the claimed benefits will ultimately be realised.
- 7.32 Similarly, Ms Rennie notes that a number of the benefits relied upon by the applicant are not secured through detailed development controls and remain dependent upon future design and implementation decisions. The retirement village is one example where the current application provides only a broad indication of development rather than a fully designed proposal.
- 7.33 Consequently, uncertainty remains regarding the number of units, built form, servicing requirements, staging and timing of delivery.
- 7.34 In my opinion, there is an important distinction between a retirement village being enabled through the proposed zoning framework and the retirement village having been sufficiently defined to allow meaningful assessment of its benefits and effects. While the retirement village may ultimately proceed and provide positive housing outcomes, the benefits presently relied upon remain largely conceptual.

- 7.35 A further concern is the location of the retirement village itself. Retirement villages are typically most successful where residents have convenient access to healthcare services, community facilities, public transport, local retail activities and opportunities for social interaction. The evidence before me indicates that many of these services would continue to be accessed outside the development, primarily in Rangiora, Kaiapoi and Christchurch. In addition, there is no certainty that the proposed commercial centre will ultimately provide the medical, professional and community services commonly relied upon by retirement village residents.
- 7.36 This concern is consistent with the broader findings of Ms Rennie, who identifies ongoing issues regarding accessibility to employment, services and facilities, public transport integration and the ability of the proposal to achieve the characteristics of a well-functioning urban environment. In my view, the benefits attributed to the retirement village are reduced by its location within a settlement that is not currently supported by the level of surrounding services and community infrastructure often associated with retirement living.
- 7.37 Accordingly, while the retirement village contributes positively to housing diversity, I am not satisfied that its location represents an inherently advantageous or sustainable outcome for future residents. Given the uncertainty regarding demand, form, timing and accessibility to supporting services, I attribute only limited weight to the retirement village component in the overall planning balance and do not consider it materially alters my conclusions regarding the strategic planning, infrastructure and settlement pattern issues arising from the proposal.

Street Tree and Vegetation Review

- 7.38 Council undertook a review of the proposed street tree planting and vegetation strategy (Appendix 17). The review identifies concerns regarding the suitability of several proposed tree species, the adequacy of rooting space and the long-term interaction between street trees, parking areas, roads and stormwater infrastructure. In particular, concerns are raised regarding the use of large-growing oak species within constrained berm areas and adjacent to swales.
- 7.39 The review concludes that the current design may not provide sufficient space to support the intended mature canopy outcomes and may result in ongoing maintenance, infrastructure conflicts and premature tree decline. Accordingly, the review recommends further refinement of species selection, planting design and infrastructure integration to ensure the long-term viability of the proposed streetscape planting.
- 7.40 In my opinion, these findings are relevant because the proposed tree planting contributes to the urban design and amenity outcomes relied upon by the applicant. However, the review indicates that the long-term delivery of those outcomes has not yet been fully demonstrated. The review also identifies the potential for increased long-term costs associated with tree replacement, maintenance requirements and repairs to adjacent infrastructure should the planting strategy not perform as intended. This is particularly relevant where the assets are ultimately intended to be vested in and maintained by Council.
- 7.41 Notwithstanding the concerns identified above, it is acknowledged that the issues relating

to the street tree and vegetation proposal are potentially capable of resolution through the provision of amended plans. Should consent be granted, conditions could require the submission and certification of a revised street tree and vegetation strategy to ensure appropriate landscaping outcomes and long-term maintenance arrangements are achieved.

8. STATUTORY ASSESSMENT

8.1 Mr Buckley, Principal Policy Planner, WDC assisted with the review of the policy context of the application and prepared a memorandum (Appendix 7). Drawing on the Plan Change 31 and District Plan Review processes, the memorandum provides context regarding the consideration of growth in this location, the outcomes of recent strategic planning exercises, and the extent to which the proposal aligns with those planning outcomes and the broader statutory framework. I have considered and incorporated Mr Buckley's analysis within my overall planning assessment below, together with the findings of the various technical reviews, and have reached my own conclusions on these matters.

8.2 The applicant has undertaken a detailed assessment of the relevant statutory instruments in Appendix 42 of the application and has identified the relevant objectives and policies. While I generally agree that the appropriate provisions have been identified, I do not necessarily agree with all of the conclusions reached by the applicant in applying those provisions to the proposal. For the purposes of this report, I have focused my assessment on those objectives and policies considered most relevant to the proposal and the key matters in dispute, rather than undertaking a comprehensive analysis of every provision.

National Policy Statement on Urban Development

8.3 The National Policy Statement on Urban Development (NPS-UD) is an important consideration in the assessment of the proposal given its focus on housing capacity, urban growth and the creation of well-functioning urban environments.

8.4 The applicant places significant reliance on the NPS-UD, particularly the provisions encouraging the provision of additional development capacity and a responsive approach to urban growth. I acknowledge that the proposal would provide a substantial quantity of housing, increase housing choice within the district, and contribute additional residential capacity. These are positive outcomes which are relevant to the purpose and intent of the NPS-UD.

8.5 However, the NPS-UD does not simply seek the provision of additional housing capacity. Objective 1 and Policy 1 require urban environments to be well-functioning, including providing good accessibility between housing, employment, community services, open spaces and commercial activities while supporting efficient urban development patterns.

8.6 Having regard to the evidence of Ms Rennie, I am not satisfied that the proposal achieves these outcomes. The urban design review identifies ongoing concerns regarding accessibility to employment opportunities, public transport availability, access to higher-order services, and the long-term reliance on private vehicle travel. While the proposal

incorporates a local commercial centre and internal active transport connections, many future residents are likely to continue relying on Rangiora, Kaiapoi and Christchurch for employment, health services, education and a range of day-to-day needs.

- 8.7 These concerns are reinforced by Council's recreation assessment, which identifies deficiencies in neighbourhood-scale reserve provision and an over-reliance on ecological corridors, stormwater areas and existing community assets to meet the recreational needs of the future population. Similarly, there is no certainty that the proposed commercial centre will attract the medical, dental, childcare and other community services relied upon by the applicant in describing the proposed community.
- 8.8 Significantly, concerns regarding the ability of Ōhoka to achieve the characteristics of a well-functioning urban environment are not new. Through both Plan Change 31 and the Proposed District Plan review process, Council considered urban growth options across the district, including on this site, and ultimately did not support urban development of this scale at Ōhoka. A key factor underpinning those decisions was concern that the location did not provide the accessibility, integration and efficiency sought by the NPS-UD.
- 8.9 The applicant places particular reliance on Policy 8, which requires decision-makers to be responsive to proposals that add significantly to development capacity. It is acknowledged that the proposal would add development capacity. However, Policy 8 must be read alongside the requirement that such development contributes to a well-functioning urban environment.
- 8.10 For the reasons outlined above, I am not satisfied that the proposal achieves that outcome. Furthermore, the evidence before me demonstrates that Council has recently undertaken a comprehensive review of future growth needs and has rezoned substantial areas of land to accommodate projected housing demand. The most recent housing capacity evidence indicates that existing plan-enabled residential capacity already exceeds forecast growth demand. Consequently, this is not a situation where the planning framework has failed to provide sufficient development opportunities or where additional greenfield land is required to address a demonstrable shortage of residential capacity.
- 8.11 Overall, while I acknowledge the proposal's contribution to housing supply and housing choice, I conclude that it does not adequately demonstrate the characteristics of a well-functioning urban environment anticipated by the NPS-UD. Consequently, I afford only limited weight to Policy 8 and conclude that, when read as a whole, the NPS-UD does not provide support for the proposal.

National Policy Statement for Infrastructure 2025

- 8.12 The National Policy Statement for Infrastructure 2025 (NPS-I) provides direction on the recognition, operation, maintenance, upgrading and development of infrastructure throughout New Zealand. The NPS-I recognises that infrastructure provides significant social, economic and cultural benefits and is essential to supporting communities, accommodating growth, and enabling the functioning of urban and rural environments. It also seeks to ensure that infrastructure is well-functioning, resilient, efficiently delivered and appropriately integrated with patterns of land use and development. Accordingly, in assessing the proposal, it is necessary to consider not only whether infrastructure can be

provided to service the development, but also whether the proposal is consistent with the broader outcomes sought by the NPS-I relating to infrastructure efficiency, resilience, integration and long-term sustainability.

- 8.13 The applicant concludes that the proposal is supported by the NPS-I because it will require and facilitate the provision of transport, three waters, electricity and telecommunications infrastructure. I agree that these are forms of infrastructure recognised under the NPS-I and that the NPS-I generally seeks to enable the efficient provision, operation, maintenance and upgrading of infrastructure.
- 8.14 However, in my view, the NPS-I is not just concerned with enabling infrastructure. Objective 1 also seeks to ensure that infrastructure is well-functioning, resilient, compatible with other activities, and delivered in a timely and efficient manner. Similarly, Policies 3 and 4 recognise the importance of strategic planning, efficient infrastructure provision, and making effective use of existing infrastructure.
- 8.15 In this case, the proposal is not located within an identified growth area and would require significant transport, wastewater, water supply, stormwater and flood management interventions to accommodate the scale of development proposed. As discussed elsewhere in this evidence, Council's transport, wastewater, water supply and stormwater experts have identified a range of outstanding matters requiring further investigation, assessment and resolution. These include questions relating to transport network capacity and upgrades, wastewater servicing, water supply capacity and resilience, stormwater management, downstream effects, funding arrangements, staging and future infrastructure ownership and maintenance.
- 8.16 While infrastructure solutions may ultimately be capable of being developed, the current evidence does not demonstrate with sufficient certainty that all infrastructure requirements can be provided in a manner that is efficient, resilient, and consistent with the outcomes sought by the NPS-I. In my view, the extent of infrastructure intervention required is not neutral from a planning perspective. Rather, the scale of infrastructure investment, upgrading and servicing required to support this unplanned greenfield development is a relevant indicator of whether the location represents an efficient and appropriate pattern of urban growth.
- 8.17 Accordingly, while the proposal could eventually be generally consistent with those aspects of the NPS-I that seek to enable infrastructure provision, I do not consider that the NPS-I provides clear support for the proposal overall. When the objectives and policies are considered as a whole, including those relating to strategic planning, infrastructure efficiency, resilience and integration, I consider the proposal achieves only limited alignment with the NPS-I.

National Policy Statement for Indigenous Biodiversity

- 8.18 The National Policy Statement for Indigenous Biodiversity (NPS-IB) is relevant because the proposal may affect indigenous wetlands, avifauna and lizard habitat and includes proposed ecological mitigation and offsetting. Council's ecological peer review identifies material information gaps concerning the presence and significance of indigenous biodiversity, the nature and magnitude of potential effects, and whether the proposed

mitigation and offsetting package will achieve the outcomes required by the NPS-IB.

- 8.19 Those gaps are not merely matters of implementation. Before reliance can be placed on conditions, there must be an adequate evidential basis to identify the affected values, determine whether any area qualifies as significant indigenous vegetation or significant habitat of indigenous fauna, apply the NPS-IB effects-management hierarchy in the correct sequence, and demonstrate that proposed measures are proportionate, additional, enduring and capable of being monitored and enforced. In particular, further work is required in relation to wetland values and loss, avifauna use of the site, indigenous lizard habitat, and the design and sufficiency of any offsetting response.
- 8.20 The ecological review does not conclude that acceptable outcomes are unattainable. Rather, it indicates that the identified effects are likely capable of being managed through further targeted assessment, refinement of avoidance and mitigation measures, an appropriately justified offsetting package where required, and clear consent conditions. However, the necessary assessment should be completed to a level that enables the Panel to determine compliance with the NPS-IB; conditions should secure a demonstrated ecological outcome rather than defer the identification of significant values or the fundamental adequacy of the response.
- 8.21 Overall, I consider that the proposal has not yet demonstrated full consistency with the NPS-IB because the present information is insufficient to complete the required effects assessment with confidence. The outstanding matters warrant further information and strengthened ecological conditions before any approval is granted. Nevertheless, having regard to the peer reviewer's conclusion that the effects are likely capable of being appropriately managed, I do not consider the NPS-IB information gaps to be sufficiently significant. They remain a material but potentially resolvable issue which would meet the intent of the NPS-IB.

National Policy Statement for Natural Hazards 2025

- 8.22 The proposal has been assessed against the relevant objectives and policies of the National Policy Statement for Natural Hazards 2025. Particular regard has been had to the flooding and stormwater evidence reviewed by Council's flooding advisor, Mr Greg Whyte (Appendix 11), and stormwater advisor, Ms Kate Purton (Appendix 10).
- 8.23 The evidence indicates that the applicant has undertaken substantial additional flood modelling and refinement of the proposed stormwater management approach. However, Mr Whyte concludes that hydraulic neutrality has not yet been demonstrated and identifies a number of outstanding matters requiring further investigation, including downstream runoff effects, stormwater management area performance, downstream drainage capacity, and further model verification.
- 8.24 While I acknowledge that flooding and stormwater effects may ultimately be capable of mitigation, I am not satisfied that all natural hazard issues have been fully resolved on the information currently before the Panel. In particular, uncertainty remains regarding the extent to which adverse flooding effects can be avoided and whether downstream effects have been appropriately assessed.

- 8.25 The flooding evidence reinforces the broader concerns identified throughout this report regarding the extent of infrastructure intervention required to facilitate development of this scale and the suitability of accommodating substantial urban growth in a location that has not been identified for growth through the established strategic planning framework.
- 8.26 Overall, while the proposal is not necessarily inconsistent with the direction of the National Policy Statement for Natural Hazards 2025, I consider that further work is required before it can be demonstrated that natural hazard risks have been appropriately managed.

Canterbury Regional Policy Statement

- 8.27 The Canterbury Regional Policy Statement (CRPS) provides the primary regional framework for the management of urban growth within Greater Christchurch. Of particular relevance are the provisions contained within Chapter 5 and 6, which establish the intended settlement pattern, direct the location of urban growth, and seek to achieve integration between land use, infrastructure, transport networks and community development.
- 8.28 The applicant acknowledges that the proposal is not anticipated by the established growth framework and identifies a number of provisions with which the proposal is inconsistent. However, the applicant concludes that the additional housing supply and development capacity provided by the proposal outweigh those inconsistencies.
- 8.29 While I acknowledge the housing and development benefits associated with the proposal, I do not reach the same conclusion. In my opinion, the proposal raises fundamental issues in relation to the strategic growth framework established by the CRPS, and those issues attract significant weight in the assessment of the application.

Chapter 5 Land-use and Infrastructure

- 8.30 Objective 5.2.1 requires development to deliver consolidated, well-designed and sustainable growth in and around existing urban areas, while maintaining environmental quality, supporting appropriate rural and business activities, and avoiding conflicts with significant resources and infrastructure. Although the proposal includes housing, commercial and open-space components, those features are typical elements of a development of this scale and do not establish consistency with the Objective's overall direction. The proposal would create a substantial new urban settlement outside the planned growth pattern, urbanise rural land, materially alter Ōhoka's identity and rural setting, and remain strongly dependent on private vehicles. Unresolved ecological, flooding, contaminated-land and infrastructure matters further limit confidence that environmental quality and infrastructure outcomes would be maintained. Overall, the proposal is inconsistent with Objective 5.2.1.
- 8.31 Objectives 5.2.2 and 5.2.3 require coordinated land use, infrastructure and transport outcomes that increase sustainability, efficiency, liveability and accessibility. The proposal is outside the planned growth framework and depends on substantial new transport, water-supply, wastewater, stormwater and flood-management infrastructure. Important servicing matters remain unresolved, while the location would generate significant external travel with limited public-transport opportunity. The potential to mitigate some direct traffic effects through applicant-funded upgrades does not address the underlying lack of integration

between the proposed land use, planned infrastructure and a consolidated urban form. The proposal is therefore inconsistent with these objectives.

- 8.32 Policy 5.3.1 is particularly relevant because its primary direction is to concentrate or attach urban growth to existing urban areas and promote a coordinated development pattern. The proposal would instead establish a substantial new urban settlement outside identified growth locations, increase private-vehicle dependence, and materially change Ōhoka's scale, identity and rural character. The inclusion of housing choice, recreation opportunities and business activity within the development does not overcome this fundamental locational inconsistency. I conclude that the proposal is contrary to Policy 5.3.1.
- 8.33 Policy 5.3.2 requires adverse effects and hazards to be avoided, remedied or mitigated, existing and planned infrastructure options to be protected, and development to integrate with infrastructure and transport networks. The proposal requires substantial mitigation and staged infrastructure delivery, but uncertainty remains regarding potable-water supply, wastewater servicing, hydraulic neutrality, downstream flooding, contaminated-soil management and ecological effects. It may also affect the efficient use of infrastructure capacity planned for identified growth areas. These matters have not been resolved sufficiently to demonstrate consistency with Policy 5.3.2, and the proposal is inconsistent with the policy overall.
- 8.34 Policy 5.3.3 requires substantial development to be high quality, robust and resilient, while maintaining or appropriately enhancing amenity, environmental quality and local character. The proposal includes housing diversity, a mixed-use centre, ecological and landscape corridors, and internal walking and cycling connections. However, these elements do not resolve the identified shortfall in functional neighbourhood parks, uncertainty over community services, significant and permanent rural-character change, or concerns about the long-term performance of infrastructure. Taken as a whole, the proposal has not demonstrated the outcomes required by Policy 5.3.3 and is inconsistent with it.
- 8.35 Policies 5.3.5 and 5.3.6 weigh strongly against the proposal on the present information. The proposed groundwater supply has not been proven for the full development; the current wastewater strategy requires an alternative solution; and hydraulic neutrality and acceptable downstream stormwater effects have not been demonstrated. These are fundamental servicing matters rather than minor design details. The proposal also relies on new infrastructure to enable urban growth in a location that does not meet Policy 5.3.1, which is the outcome Policy 5.3.6 expressly discourages. I conclude that the proposal is contrary to these policies.
- 8.36 Policy 5.3.7 seeks to avoid development that adversely affects the safe, efficient and effective functioning of the strategic transport network or forecloses future strategic requirements. The transport evidence indicates that direct safety and capacity effects may be addressed through substantial road and intersection upgrades, staging and conditions. However, the proposal would generate substantial additional demand on the arterial network, and acceptable operation depends on timely delivery and full funding of those works. The proposal therefore does not presently demonstrate consistency with Policy 5.3.7. Even if the direct network effects were mitigated, that would not resolve the broader urban-form, accessibility and private-vehicle-dependence concerns under Objectives 5.2.2 and 5.2.3.

- 8.37 Overall, the proposal does not achieve alignment with the Chapter 5 framework. While it contains conventional housing, mixed-use, open-space and internal-design features, those matters do not overcome the more directive requirements for consolidated growth, coordinated land use and infrastructure, efficient and accessible transport, protection of rural character, and certainty of three-waters servicing.

Chapter 6 Recovery and Rebuilding of Greater Christchurch

Objective 6.2.1 Recovery framework

- 8.38 Objective 6.2.1 establishes the land use and infrastructure framework for growth within Greater Christchurch. Of particular relevance to this proposal are those aspects of the objective that identify priority areas for urban development, avoid urban development outside existing urban areas and greenfield priority areas, integrate infrastructure and services with land use development, and optimise the use of existing infrastructure.
- 8.39 The proposal would establish a substantial new urban community outside the existing urban area and outside any Greenfield Priority Area or Future Development Area identified through the Greater Christchurch growth framework. Accordingly, the proposal is not located in an area anticipated for urban expansion under the CRPS.
- 8.40 I acknowledge the applicant's submission that the proposal should be assessed on its merits and that more recent planning instruments, including the NPS-UD and the Fast-track Approvals Act 2024, enable consideration of unanticipated urban growth proposals. However, this doesn't mean that any growth is appropriate anywhere. In my view, these matters do not diminish the significance of the strategic direction contained within Objective 6.2.1. Rather, the objective remains an important expression of the intended pattern of urban growth for Greater Christchurch and the coordinated relationship between land use, infrastructure and transport planning.
- 8.41 While the proposal would contribute to housing supply and provide associated infrastructure, it would also require substantial transport, wastewater, water supply, stormwater and flood management interventions to support development at the scale proposed. As discussed elsewhere in this assessment, a range of infrastructure matters remain subject to further investigation, upgrades and implementation mechanisms. In my opinion, this is not indicative of a development that optimises existing infrastructure or reflects the coordinated pattern of growth anticipated by the CRPS.
- 8.42 For these reasons, I conclude that the proposal is inconsistent with Objective 6.2.1, particularly those aspects of the objective that seek to direct urban development to identified growth areas and integrate infrastructure planning with patterns of urban growth.

Objective 6.2.1A – Housing Bottom Lines

- 8.43 Objective 6.2.1A seeks to ensure sufficient development capacity for housing is enabled across the Greater Christchurch urban environment. While the proposal would provide additional housing supply, I note the evidence before the Panel indicates that substantial

development capacity is already enabled within Greater Christchurch, including within Waimakariri District. Accordingly, while I afford some positive weight to the additional housing capacity generated by the proposal, I do not consider that Objective 6.2.1A materially alters my conclusions regarding the proposal's inconsistency with the broader strategic growth framework

Objective 6.2.2 - Urban form and settlement pattern

- 8.44 Objective 6.2.2 is a highly relevant and directive provision because it identifies both the urban form sought for Greater Christchurch and the locations in which urban growth is intended to occur. Read as a whole, it seeks consolidation and intensification of existing urban areas and the avoidance of unplanned urban expansion.
- 8.45 The proposal has some limited alignment with clause 2. It would provide additional residential capacity, a range of housing types, some higher-density housing, and a local commercial centre. Those features are broadly consistent with the encouragement of higher-density living environments, mixed-use development and housing choice. However, clause 2 particularly anticipates those outcomes in and around identified centres, greenfield priority areas, Future Development Areas and brownfield sites. Ōhoka and the application site are not identified in those terms.
- 8.46 Clause 1 concerns intensification targets over the recovery period ending in 2028. Although the proposal would add development capacity, it is predominantly greenfield urban expansion and would not materially advance consolidation or intensification within an existing urban area. Clause 3, concerning the role of the Christchurch central business district, is not directly relevant.
- 8.47 Clause 4 is of particular significance. It provides for peripheral urban development in greenfield priority areas and in Future Development Areas where the circumstances in Policy 6.3.12 are met, at a rate and in locations that meet anticipated demand and enable efficient infrastructure provision and use. On the evidence before me, the site is not within either category. The proposal would also require substantial new transport, water supply, stormwater and flood-management infrastructure, with material uncertainty remaining as to aspects of servicing and delivery. It therefore does not accord with the planned and infrastructure-integrated form of greenfield growth contemplated by clause 4.
- 8.48 Clause 5 expressly encourages sustainable and self-sufficient growth in Rangiora, Kaiapoi and Woodend within Waimakariri District. Ōhoka is not included. I consider that omission to be important. The proposal would not be a modest extension maintaining Ōhoka's existing role; the specialist evidence characterises it as a substantial new urban settlement that would become the dominant component of Ōhoka and materially alter its position in the wider settlement hierarchy. It would therefore redirect a material share of growth away from the settlements expressly identified by the Objective.
- 8.49 Clause 6 concerns the management of rural-residential development outside existing urban and priority areas. The proposal is materially greater in scale and intensity than rural-residential development and would establish an urban settlement outside those planned locations. It is therefore contrary to, rather than supported by, the direction in clause 6.

- 8.50 I also place substantial weight on the recent strategic planning context. Council has completed a district-wide review of growth demand, housing capacity, infrastructure and settlement options through the District Plan process and has rezoned significant land in planned growth locations. The housing capacity evidence indicates that plan-enabled capacity substantially exceeds forecast demand. The proposal is therefore not necessary to remedy an identified capacity shortfall, and the evidence does not establish a compelling need to depart from the coordinated settlement pattern in Objective 6.2.2.
- 8.51 Overall, I conclude that the proposal is inconsistent with Objective 6.2.2. The principal reasons are that it would enable unplanned urban expansion, is not located within a greenfield priority area or qualifying Future Development Area, would direct substantial growth to Ōhoka rather than to the Waimakariri settlements identified in clause 5, and has not been shown to be required to meet anticipated demand or to achieve the efficient provision and use of network infrastructure.

Objective 6.2.3 – Sustainability

- 8.52 The proposal has partial alignment with Objective 6.2.3. It would provide a range of residential densities and uses, a local commercial centre, an extensive green-blue network, active-transport connections and some positive neighbourhood design outcomes. Those features support clauses 1 and 4 and contribute to amenity and housing choice. However, the evidence identifies unresolved or adverse outcomes relating to rural landscape character, ecological effects, flooding, long-term water supply, recreation provision, accessibility to employment and services, and dependence on private vehicles. Overall, while the proposal contains positive internal design and environmental elements, I am not satisfied that it would be functionally efficient or environmentally sustainable in this location. I therefore conclude that it only partially achieves Objective 6.2.3.

Objective 6.2.4 – Integration of transport infrastructure and land use

- 8.53 The proposal would provide internal walking and cycling routes and the transport evidence indicates that many direct network effects could be managed through staged road and intersection upgrades. Those matters provide some support in relation to safety, modal choice and network management. However, the development is outside the priority growth pattern, requires substantial new transport investment, and would generate significant travel to employment, higher-order services and facilities in Rangiora, Kaiapoi and Christchurch. Public transport provision remains uncertain and future residents would remain strongly dependent on private vehicles. The proposal therefore does not maximise integration with priority areas or optimise existing network capacity and performs poorly against the directions to reduce private-vehicle dependence, energy use and emissions. I conclude that it is inconsistent with Objective 6.2.4 notwithstanding that its direct engineering effects may be mitigated.

Objective 6.2.5 – Key activity and other centres

- 8.54 Objective 6.2.5 seeks to support and maintain the existing network of the Central City, Key Activity Centres and neighbourhood centres as focal points. Ōhoka is not identified within that network, and the nature, scale, timing and ultimate tenant mix of the proposed centre are uncertain. The proposal would also establish a new commercial focal point associated

with an unplanned settlement and could redistribute activity from established centres. Therefore I conclude that the proposal is inconsistent with Objective 6.2.5.

Objective 6.2.6 – Business land development

- 8.55 Objective 6.2.6 requires business land provision to support the settlement pattern established by Objective 6.2.2 and primarily directs new commercial activity to the Central City, Key Activity Centres and neighbourhood centres. Because the proposed business area forms part of substantial urban growth outside that settlement pattern, it does not satisfy the Objective's primary locational direction. Nor is there certainty that the centre will deliver the range of community and professional services relied upon. I therefore conclude that the proposal is inconsistent with Objective 6.2.6 overall, although its local employment and design benefits attract some positive weight.

Policy 6.3.1 – Development within the Greater Christchurch area

- 8.56 Policy 6.3.1 is strongly directive. Clauses 1–4 require development to give effect to Map A and specify that new urban activities are to occur only within existing urban areas or identified greenfield priority areas unless otherwise expressly provided for in the CRPS. The site is not identified for urban development in Map A and the proposal is not an intensification of an existing urban area. No express alternative provision has been established on the evidence before me. The proposed commercial centre also requires examination under clause 8 because of its potential effects on established centres and public investment. The proposal is therefore directly inconsistent with clauses 1, 3 and 4 and has not demonstrated compliance with clause 8. I conclude that it is contrary to Policy 6.3.1.

Policy 6.3.2 – Development form and urban design

- 8.57 At the internal neighbourhood scale, the proposal has a number of positive attributes under Policy 6.3.2. While the proposal incorporates a number of design elements that are generally consistent with aspects of Policy 6.3.2, including housing choice, a mixed-use component, a connected internal street and path network, landscape and ecological corridors, and opportunities for passive solar design, Council's urban design and recreation evidence identifies a number of matters that require further refinement. In particular, concerns remain regarding the extent to which the proposal provides functional neighbourhood park provision, achieves the desired urban design outcomes, and delivers a high-quality urban environment consistent with the policy's intentions.
- 8.58 The policy requires the principles of good urban form and design to be applied in a manner that responds appropriately to context. In this regard, the proposal would replace a substantial rural area, become the dominant component of Ōhoka, and materially alter the settlement's identity and relationship with its rural setting. External connectivity is weak, public transport provision remains uncertain, and many day-to-day trips would continue to rely on private vehicles. Furthermore, the recreation assessment identifies a shortfall in functional neighbourhood park provision, and the urban design evidence identifies aspects of the layout and design that require modification to better achieve the outcomes sought by the policy.

- 8.59 Accordingly, while the proposal demonstrates some positive urban design attributes, significant concerns remain regarding whether the current design will achieve the outcomes anticipated by Policy 6.3.2. When considered alongside the proposal's limited integration with its wider context and transport network, I conclude that the proposal is inconsistent with Policy 6.3.2.

Policy 6.3.4 – Transport effectiveness

- 8.60 Policy 6.3.4 seeks to ensure development supports an effective, efficient and integrated transport system by making efficient use of existing transport infrastructure, and encouraging a greater range of travel choices. An integrated transport assessment has been provided, and the transport reviewers consider that many direct traffic and safety effects can be addressed through upgrades, staging and conditions. The proposal also includes internal active-transport infrastructure. However, it would create substantial additional demand on the wider road network, require significant new works, and establish a travel pattern dominated by private vehicles. It does not optimise existing network capacity or provide convincing opportunities for public transport uptake and travel-demand management. Any approval would need to ensure that all required mitigation is funded and delivered by the applicant before the relevant stages proceed. Even with such measures, I conclude that the proposal is inconsistent with Policy 6.3.4 because mitigation of network effects does not resolve the inefficient travel pattern created by the location.

Policy 6.3.5 – Integration of land use and infrastructure

- 8.61 Policy 6.3.5 seeks to ensure that urban development is integrated with infrastructure planning and investment, and that growth occurs in locations where infrastructure can be provided efficiently, effectively and in a timely manner. The proposal is not within a priority area or Future Development Area identified to support reliable forward infrastructure planning. It depends on new transport, water-supply, stormwater and flood-management infrastructure, and important matters remain unresolved as to groundwater yield and treatment, network resilience, hydraulic neutrality, downstream effects, funding, staging and future vesting. Although conditions may coordinate some works with staged development, Policy 6.3.5 requires appropriate infrastructure to be in place before new development occurs and seeks efficient, affordable provision that protects existing and planned investment. The present uncertainties, together with the site's location outside planned growth areas, mean those outcomes have not been demonstrated. I conclude that the proposal is contrary to Policy 6.3.5.

Policy 6.3.6 – Business land

- 8.62 Policy 6.3.6 seeks to achieve a well-functioning network of business areas that supports economic activity while reinforcing the urban form strategy, protecting the role of established centres, and making efficient use of infrastructure and transport networks. The proposed commercial centre could provide local employment, reduce some trips, support mixed use and incorporate good urban design. Those aspects align with clauses 10–12. However, new commercial activity is primarily directed to the Central City, Key Activity Centres and neighbourhood centres, or must be shown not to cause significant distributional or urban-form effects when located out of centre. The proposal is not within the established centres network and is associated with an unplanned settlement. The

evidence presently recorded does not establish the absence of significant distributional effects, demonstrate proximity to major transport hubs or passenger transport networks, or confirm that the proposed business land will utilise existing infrastructure capacity. I therefore conclude that the proposal has some alignment but is inconsistent with the principal locational and infrastructure directions of Policy 6.3.6.

Policy 6.3.7 – Residential location, yield and intensification

- 8.63 Policy 6.3.7 requires residential greenfield development to occur in accordance with Map A, subject to Policies 5.3.4, 6.3.5 and 6.3.12, and directs intensification to existing centres, core public-transport routes, mixed-use areas and suitable brownfield land. The site is outside Map A's identified residential greenfield areas and is not an intensification location of the type described. The proposal would provide a range of lot sizes, densities and housing types and may meet or exceed the minimum density that would apply to an identified Waimakariri greenfield area. Those yield and affordability-related benefits do not displace the antecedent requirement that greenfield growth occur in the locations identified by Map A. Existing plan-enabled capacity also substantially exceeds forecast demand, so the proposal is not necessary to remedy a demonstrated housing-capacity shortfall. I conclude that it is contrary with Policy 6.3.7.

Overall conclusion on Objectives 6.2.3–6.2.6 and Policies 6.3.1–6.3.7

- 8.64 The proposal contains typical internal design, housing-choice, mixed-use, landscape and active-transport features. It may also be possible to mitigate many direct transport effects through substantial upgrades and conditions. However, the provisions must be read together as an integrated strategic framework. Their dominant direction is to locate urban and business growth within the Map A settlement pattern, integrate it with planned infrastructure and centres, optimise existing networks, and reduce dependence on private vehicles. The proposal does not achieve those outcomes. Its location outside identified growth areas gives rise to material inconsistencies that cannot be cured solely through good internal design or engineering mitigation. Taken together, these provisions weigh strongly against the proposal.

Partially Operative District Plan

- 8.65 The applicant has undertaken a detailed assessment of the proposal against the objectives and policies of the Partially Operative District Plan (District Plan). I have not repeated that assessment or addressed every provision identified by the applicant. Instead, I have focused on the objectives and policies most relevant to the key issues raised by the proposal, including the strategic location and scale of urban growth, achievement of a well-functioning urban environment, integration with infrastructure and transport, effects on Ōhoka's character and amenity, natural-hazard risk, and the adequacy of subdivision and servicing outcomes. The provisions discussed below are therefore those that have the greatest bearing on my overall assessment and conclusions.

Strategic Directions

- 8.66 The Strategic Directions chapter provides the overarching framework for the management of growth, development, infrastructure and natural resources within the District. In my view,

the most relevant provisions are SD-O1 to SD-O5 and SD-O7.

SD-O1 Natural Environment

- 8.67 Objective SD-O1 seeks to maintain indigenous biodiversity, preserve and enhance natural character, provide public access to natural areas, recognise ki uta ki tai, and prioritise freshwater health.
- 8.68 The proposal incorporates ecological corridors, open space, stormwater features and riparian enhancement that are generally supportive of these outcomes. However, the ecological review identifies unresolved concerns relating to wetlands, indigenous biodiversity, lizard habitat, avifauna and offsetting proposals. Similarly, uncertainty remains regarding stormwater management and downstream effects.
- 8.69 Accordingly, I consider the proposal only partially achieves SD-O1.

SD-O2 Well-Functioning Urban Environments

- 8.70 Objective SD-O2 seeks well-functioning urban environments that enable social, economic and cultural wellbeing.
- 8.71 This objective is directly relevant to the proposal. While the development would provide housing choice, open space, active transport connections and a local commercial centre, the evidence identifies continuing concerns regarding accessibility to employment, higher-order services, public transport integration and reliance on private vehicle travel.
- 8.72 Having regard to the evidence of Mr Buckley, Ms Rennie and the conclusions reached through recent planning processes, I am not satisfied that the proposal demonstrates the characteristics of a well-functioning urban environment anticipated by the District Plan.

SD-O3 Urban Development

- 8.73 In my opinion, SD-O3 is a significant strategic provision relevant to the proposal.
- 8.74 The objective directs urban development toward existing towns and identified development areas, seeks consolidation and integration with existing urban areas, supports the hierarchy of urban centres, and anticipates the use of reticulated infrastructure where available.
- 8.75 The proposal is inconsistent with a number of these outcomes. The site is not identified as a development area, is not located within or immediately adjacent to an existing urban area of the scale anticipated by the District Plan, and would establish what specialist reviewers describe as a substantial new settlement. The proposal would also direct growth to Ōhoka rather than to the principal centres identified in the objective, including Rangiora, Kaiapoi, Woodend and Pegasus.
- 8.76 Further, the proposal remains subject to unresolved infrastructure issues relating to water supply, wastewater and stormwater servicing.

8.77 For these reasons, I conclude the proposal is contrary to SD-O3.

SD-O4 Energy and Infrastructure

8.78 Objective SD-O4 seeks integrated and coordinated land use and infrastructure planning, efficient infrastructure provision, and improved accessibility and connectivity.

8.79 While infrastructure solutions may ultimately be capable of being provided, the current evidence identifies significant uncertainty in relation to water supply, wastewater, stormwater and associated infrastructure delivery. The proposal remains heavily dependent upon future infrastructure investment and confirmation of servicing solutions.

8.80 Accordingly, I am not satisfied that the proposal will achieve the level of infrastructure anticipated by SD-O4.

SD-O5 Rural Environment

8.81 Objective SD-O5 seeks to ensure land outside identified development areas remains available for rural and primary production activities and that incompatible sensitive activities do not undermine rural land use.

8.82 The proposal would urbanise a substantial area of land currently within the rural environment and remove it from future rural use. While the site may not comprise highly productive rural land, the proposal would nevertheless represent a significant departure from the rural character and function anticipated by the objective.

8.83 I therefore consider the proposal contrary to SD-O5.

SD-O6 Ngāi Tūāhuriri

8.84 I acknowledge the importance of SD-O6 and have had regard to the cultural values identified throughout the application and supporting material. My assessment of this objective relies primarily on the evidence and position of Te Ngāi Tūāhuriri Rūnanga whom have been invited to provide comment on the proposal, so I will defer to the Te Ngāi Tūāhuriri Rūnanga position.

SD-O7 Natural Hazards and Resilience

8.85 Objective SD-O7 seeks to avoid development where natural hazard risk is unacceptable and mitigate other natural hazard risks.

8.86 The flooding review identifies that hydraulic neutrality has not yet been demonstrated and uncertainty remains regarding downstream flooding effects and stormwater network performance. In addition, the geotechnical review identifies the need for further investigation regarding liquefaction risk and geotechnical constraints.

8.87 While these matters may ultimately be resolved, the current evidence does not provide sufficient certainty to conclude that the objective has been fully achieved.

Conclusion

- 8.88 Overall, I consider the proposal is contrary with the strategic direction provided by the District Plan. While it would provide housing supply, housing choice and investment benefits, it does not align with the District Plan's intended settlement pattern, raises significant infrastructure and servicing concerns, and has not demonstrated that urban development of this scale is appropriate in this location. Particular weight is attached to Objectives SD-O2, SD-O3, SD-O4 and SD-O5, which collectively point away from the establishment of a substantial new settlement at Ōhoka.

Urban Form and Development

- 8.89 The Urban Form and Development chapter is highly relevant to the proposal because it establishes both the District's required housing capacity and the locations where future urban growth is intended to occur. Mr Buckley addresses these provisions in detail in his policy memorandum (Appendix 7) and I agree with his conclusions.
- 8.90 I acknowledge that the proposal would provide additional residential capacity and housing choice. In that regard, it is broadly consistent with the intent of Objective UFD-O1, which seeks to ensure sufficient feasible development capacity is available to meet future housing demand. However, the evidence before me demonstrates that Waimakariri District already has substantial plan-enabled housing capacity available through existing urban areas and identified development areas. The recent Greater Christchurch Housing Capacity Assessment 2026 identifies approximately 87,667 dwellings (refer to Appendix 1 of Mr Buckley's report) of plan-enabled capacity in Waimakariri District compared with forecast demand of approximately 4,850 dwellings in the short to medium term. While I acknowledge the plan-enabled capacity figures represent theoretical development potential and may overstate the level of housing likely to be realised in practice, the evidence nevertheless demonstrates that substantial housing capacity already exists within Greater Christchurch and Waimakariri District. The key point is that sufficient development capacity is already enabled to accommodate forecast growth within locations identified through the strategic planning framework.
- 8.91 Accordingly, while the proposal would increase development capacity, I am not satisfied that additional urban land at this scale in Ōhoka is required to achieve the housing capacity outcomes sought by the District Plan.
- 8.92 Particular weight is attached to Policy UFD-P2. Within Greater Christchurch, the policy clearly anticipates that new residential development will occur within existing urban areas or identified development areas and be informed through an Outline Development Plan process. The subject site is not identified as a Development Area and has not been incorporated into the District's planned growth framework.
- 8.93 Policy UFD-P2 also requires residential growth to be integrated with infrastructure planning and funding decisions, be well connected to jobs, services and open space, support public and active transport, be resilient to natural hazards, and avoid or mitigate reverse sensitivity effects. The evidence before me identifies unresolved concerns regarding water supply, wastewater servicing, stormwater management, flooding, transport integration, accessibility

to employment and community services, and reliance on private vehicle travel. These matters weigh against the proposal's consistency with the policy.

- 8.94 I also agree with Mr Buckley's conclusion that the proposal is inconsistent with the District's intended urban form. The District Plan directs growth toward existing urban centres, identified development areas and locations supported by planned infrastructure. The proposal would establish a substantial new settlement in a location not identified for urban growth and would materially alter the role and scale of Ōhoka within the wider settlement hierarchy.

Conclusion

- 8.95 While the proposal would provide additional housing supply and development capacity, I am not satisfied that it is required to achieve the housing capacity outcomes anticipated by the District Plan. I am also not satisfied that the proposal aligns with the growth locations, infrastructure integration, transport accessibility and well-functioning urban environment outcomes anticipated by the Urban Form and Development chapter. Accordingly, I conclude that the proposal is contrary with Objectives UFD-O1 and UFD-O2 and Policy UFD-P2, and only provides limited support for the wider outcomes sought by the Urban Form and Development framework.

Energy and Infrastructure

- 8.96 Objectives EI-O1 to EI-O3 and Policies EI-P1 and EI-P2 seek to ensure that development is coordinated with the provision of efficient, resilient, safe and sustainable infrastructure and that land use does not proceed unless adequate servicing can be provided. These provisions recognise the importance of water supply, wastewater and stormwater infrastructure to the social, economic and environmental wellbeing of the District.
- 8.97 While the proposal includes infrastructure strategies intended to service the development, the evidence before me identifies significant unresolved concerns regarding the adequacy and certainty of key infrastructure systems.
- 8.98 In particular, the technical reviews identify ongoing uncertainty relating to:
- a) The long-term availability and reliability of a potable water supply;
 - b) Groundwater yield, treatment requirements, storage requirements and network resilience;
 - c) The ability of the proposal to achieve hydraulic neutrality and avoid adverse downstream flooding effects;
 - d) The performance and capacity of the proposed stormwater and drainage systems; and
 - e) The ability of the proposed infrastructure to service the ultimate development in a reliable and sustainable manner.
- 8.99 These are not minor matters. Water supply, wastewater and stormwater infrastructure are fundamental prerequisites for urban development of this scale. In my opinion, the current application has not demonstrated with sufficient certainty that these servicing requirements can be provided in a manner consistent with the objectives and policies of the District Plan.

8.100 While some matters may ultimately be capable of resolution through further investigations, detailed design and additional assessment, the current proposal relies on a degree of future confirmation that extends beyond what I consider appropriate for a development of this scale.

Transport

8.101 The transport provisions seek an integrated, safe, efficient and sustainable transport system that supports economic development while reducing reliance on private vehicles and encouraging active and public transport modes.

8.102 The proposal has some positive aspects when assessed against these provisions. The transport evidence indicates that many direct traffic effects can be managed through upgrades to the surrounding roading network, intersection improvements, active transport infrastructure and staging controls. The proposal also includes internal walking and cycling connections, a local commercial centre and a subdivision layout that seeks to provide connectivity within the development.

8.103 However, when assessed against the transport objectives and policies as a whole, I consider that the proposal only partially achieves the intended outcomes.

8.104 The primary concern is not whether engineering solutions can be implemented to mitigate traffic effects, but whether the proposal promotes the type of integrated and sustainable transport outcomes anticipated by the District Plan. In this regard, the evidence identifies that:

- a) The proposal would generate a substantial increase in vehicle movements;
- b) Significant transport upgrades are required before the development can be appropriately serviced;
- c) Future residents will remain heavily reliant on private vehicle travel for employment, higher-order retail, health, education and community services;
- d) Public transport integration remains limited and uncertain;
- e) Many daily trips will continue to be directed toward Rangiora, Kaiapoi and Christchurch; and
- f) The proposal relies on continued investment in the wider transport network to achieve acceptable outcomes.

8.105 While the proposal includes active transport facilities and internal connectivity, the evidence indicates that the majority of strategic trips will continue to occur by private vehicle. Consequently, I am not satisfied that the proposal strongly advances the outcomes sought by Objective TRAN-O1, which promotes an integrated, sustainable transport system and seeks to reduce dependency on single-occupant vehicles.

8.106 Similarly, while the proposal may ultimately avoid or mitigate many direct transport effects through infrastructure upgrades and conditions, the broader transport pattern remains one characterised by significant reliance on the surrounding road network. This reduces consistency with Objectives TRAN-O3 and TRAN-O4 and Policies TRAN-P2, TRAN-P4,

TRAN-P5 and TRAN-P7, all of which seek to promote sustainable transport choices, integration with public transport and efficient use of the transport network.

- 8.107 Accordingly, I conclude that the proposal is only partially consistent with the transport objectives and policies of the Partially Operative District Plan. While many direct effects are capable of mitigation, overall the proposal is contrary with the Partially Operative District Plans direction toward integrated land use and transport planning, public transport accessibility and reduced dependency on private vehicle travel.

Subdivision

- 8.108 The Subdivision Chapter seeks to ensure that subdivision achieves an integrated pattern of land use, development and urban form that is consistent with the identified character and function of the relevant zone, supports sustainable infrastructure provision, protects environmental and cultural values, and achieves an efficient and connected urban environment.

Objective SUB-O1 and Policies SUB-P1 and SUB-P2

- 8.109 Objective SUB-O1 and Policies SUB-P1 and SUB-P2 require subdivision to support the anticipated character, form and function of the relevant zone and achieve an integrated pattern of development.
- 8.110 The proposal has some alignment with these provisions. The subdivision includes a range of residential lot sizes, open spaces, active transport connections, ecological corridors and a local commercial centre. These elements support an integrated urban form and provide a degree of housing choice.
- 8.111 However, in my opinion, the issue is not whether the subdivision has been designed comprehensively, but whether the form of development is appropriate in this location. As discussed elsewhere in this report, the site is not identified for urban development through the strategic planning framework and the proposal would establish a substantial new settlement rather than a logical extension of Ōhoka. For this reason, I consider the proposal only partially achieves these provisions.

Objective SUB-O2, Policies SUB-P4 and SUB-P8

- 8.112 Objective SUB-O2 and Policies SUB-P4 and SUB-P8 seek subdivision outcomes that support efficient infrastructure provision and a safe, connected and accessible transport network.
- 8.113 The evidence identifies a number of concerns regarding infrastructure certainty. Significant transport upgrades are required, long-term water supply remains uncertain, and flooding and stormwater matters are yet to be resolved. While some of these matters may be capable of being addressed through further investigation, detailed design and conditions, the proposal remains dependent on substantial infrastructure investment and servicing solutions that are not yet demonstrated.

8.114 Similarly, concerns remain regarding wider connectivity, accessibility to employment, public transport integration and reliance on private vehicle travel. These issues have been identified by both the urban design and transport reviews.

8.115 Accordingly, I consider the proposal in its current form is inconsistent with this objective and policies.

Objective SUB-O3 and Policies SUB-P9 and SUB-P10

8.116 These provisions seek the protection and enhancement of waterbody margins, provision of esplanade reserves and strips where appropriate, public access opportunities, and protection of ecological and mahinga kai values.

8.117 The proposal includes ecological corridors, waterways, stormwater features and public access connections that contribute positively toward these outcomes.

8.118 However, ecological concerns remain regarding wetlands, habitat values, offsetting proposals and the adequacy of some mitigation measures. Consequently, while the proposal is generally supportive of the intent of these provisions, full achievement remains dependent on resolution of the ecological matters identified elsewhere in this report.

Policy SUB-P3 Sustainable Design

8.119 Policy SUB-P3 promotes sustainable subdivision design, including solar orientation, active transport, water-sensitive design, stormwater management and adaptation to climate change.

8.120 The proposal incorporates a number of features that are broadly consistent with this policy, including walking and cycling networks, stormwater management areas and integrated open-space corridors.

8.121 However, the evidence identifies ongoing concerns regarding flooding, stormwater management, long-term infrastructure resilience and the extent to which future residents will remain reliant on private vehicle travel. While the proposal incorporates a number of sustainable design elements, I am not satisfied that all aspects of the policy have been fully demonstrated.

Policy SUB-P5 Residential Density

8.122 The proposal would provide a range of lot sizes and housing typologies. In this respect it is generally consistent with the policy direction encouraging residential choice and variety. Nevertheless, the key issue remains the appropriateness of accommodating this level of residential density and development capacity in a location that has not been identified for urban growth through the District Plan or wider strategic planning framework.

Conclusion

8.123 Overall, I consider the proposal demonstrates a number of positive subdivision design

attributes and performs reasonably well when assessed against matters such as internal layout, housing diversity, open-space provision, active transport connections and integrated urban design. However, the subdivision provisions must be read in the broader context of the District Plan and strategic planning framework.

- 8.124 While the proposal may achieve many site-specific subdivision outcomes, it does not overcome the more fundamental concerns identified elsewhere in this report regarding settlement pattern, infrastructure certainty, transport integration and the appropriateness of urban growth in this location. Consequently, I consider the proposal only partially achieves the objectives and policies of the Subdivision Chapter.

Rural Lifestyle Zone

- 8.125 The application site is located within the Rural Lifestyle Zone. The strategic intent of the zone is set out in Objective RLZ-O1, which seeks to provide for primary production activities and activities reliant on the natural and physical resources of the rural environment while recognising the zone's distinctive character of small rural sites and a more intensive pattern of rural land use than the General Rural Zone.

- 8.126 Policy RLZ-P1 further identifies the characteristic qualities of the Rural Lifestyle Zone, including a highly modified landscape comprised of small rural lots, residential units, domestic planting, open paddocks and smaller-scale primary production activities. The policy seeks to maintain this established character and recognises the importance of open space, vegetation and a semi-rural environment as defining elements of the zone. In my opinion, the proposal is contrary with this character.

- 8.127 Rather than maintaining the existing fine-grained rural lifestyle pattern, the proposal would replace it with a substantial urban environment comprising approximately 850 residential lots, retirement village development, commercial activities, associated infrastructure and a significantly altered landscape pattern. The existing rural lifestyle character would be largely removed and replaced with an urban form more characteristic of a residential suburb than a rural lifestyle environment.

- 8.128 Policy RLZ-P2 seeks to retain opportunities for land to be used for primary production while maintaining the predominant character of small rural lots. The policy does this by generally avoiding further fragmentation and residential development below specified thresholds, except in limited circumstances. While the policy is directed toward subdivision and development within the Rural Lifestyle Zone rather than comprehensive urbanisation, it clearly signals an intention to maintain the rural lifestyle function and character of the zone rather than facilitate urban expansion.

- 8.129 The proposal would not maintain or reinforce the Rural Lifestyle Zone character anticipated by RLZ-O1, RLZ-P1 and RLZ-P2. Instead, it would effectively remove a substantial area of Rural Lifestyle Zone land from the rural environment and establish a new urban settlement. This outcome is contrary with both the purpose of the zone and the character outcomes sought by the District Plan.

- 8.130 Overall, I conclude that the proposal is contrary with the Rural Lifestyle Zone objective and policies. The proposal does not maintain the established rural lifestyle character of the zone

and would introduce urban development of a scale and intensity that is fundamentally different from that anticipated by RLZ-O1, RLZ-P1 and RLZ-P2.

Operative District Plan

8.131 The Operative District Plan remains relevant to this assessment as the applicant has sought urban zoning of the site through the District Plan review process and that matter remains subject to ongoing appeal proceedings. I have therefore considered both the Operative and Partially Operative District Plans. However, the zoning framework and associated objectives and policies relevant to this proposal are largely consistent between the two plans and, in my opinion, a separate detailed assessment of both frameworks would result in substantial duplication.

8.132 Accordingly, I have focused my detailed evaluation on the Partially Operative District Plan provisions, which represent the most recent expression of the District's planning framework, while noting that the conclusions reached are broadly applicable to the corresponding provisions of the Operative District Plan. Consequently, a separate assessment of the Operative District Plan would not materially alter my overall conclusions regarding the proposal.

9. AGREED MATTERS

- 9.1 I have reviewed the applicant's planning assessment and agree with the following:
- a) The proposal requires consent as a Non-Complying Activity under the Operative District Plan, Partially Operative District Plan and relevant provisions of the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.
 - b) The proposal would provide an increase in housing supply and housing choice within the district.
 - c) The proposal would generate economic activity and investment during its construction and development phases.
 - d) The proposal incorporates a network of open space, ecological corridors, landscape planting that would provide amenity and environmental benefits.
 - e) The proposal would provide a local commercial centre that has the potential to support some day-to-day community needs and local employment opportunities.
- 9.2 However, agreement on these matters does not alter my overall conclusion that the proposal gives rise to significant strategic planning, settlement pattern, infrastructure and landscape concerns. In particular, I do not agree that the identified benefits justify the scale of departure from the established Greater Christchurch growth framework.

10. CONSENT CONDITIONS

- 10.1 If the Panel is minded to grant consent, the matters summarised in Appendix 1 should be demonstrated before consent is granted to ensure detailed implementation matters can be appropriately secured through conditions. These recommendations do not overcome the fundamental strategic location, settlement-pattern and rural-character concerns identified

in this report.

11. SECTION 85(3) FAST-TRACK APPROVALS ACT 2024

- 11.1 Section 85(3) of the Fast-track Approvals Act 2024 provides that a Panel may decline an application where it concludes that identified adverse impacts are sufficiently significant that they are out of proportion to the project's regional or national benefits, even after taking into account proposed mitigation, offsets, compensation measures and conditions of consent.
- 11.2 In considering this provision, I acknowledge that the proposal would increase housing supply, provide additional housing choice, generate construction and economic activity, and contribute to residential development capacity within the Waimakariri District.
- 11.3 However, in my opinion, the primary issue is not whether the proposal provides benefits, but whether those benefits are sufficient to justify the adverse effects and strategic implications arising from the development.
- 11.4 As discussed throughout this report, the proposal gives rise to a number of significant adverse impacts and unresolved concerns including:
- a) A substantial departure from the established Greater Christchurch settlement pattern and strategic growth framework;
 - b) Urban expansion into a location not identified for growth through the CRPS, Greater Christchurch Spatial Plan or District Plan processes;
 - c) Potential adverse effects on the efficiency and effectiveness of planned infrastructure investment;
 - d) Ongoing uncertainty regarding long-term water supply, flooding and stormwater management outcomes;
 - e) Significant landscape and rural character change associated with the establishment of what specialist reviewers describe as a substantial new urban settlement;
 - f) Concerns regarding achievement of a well-functioning urban environment, including accessibility to employment, services and public transport;
 - g) Shortfalls in recreation and community infrastructure provision; and
 - h) Ongoing ecological concerns requiring further assessment and refinement of proposed mitigation measures.
- 11.5 Importantly, many of these issues are not matters that can be fully resolved through consent conditions. While conditions may address aspects of infrastructure delivery, staging, engineering design and ecological mitigation, conditions cannot fundamentally alter the strategic location of the proposal or remove the inconsistency with the planned settlement pattern for Greater Christchurch.
- 11.6 I also place considerable weight on the fact that growth at this location has recently been considered through Plan Change 31 and the Proposed District Plan process. Those processes examined growth demand, housing capacity, infrastructure and settlement options. The current economic evidence indicates that existing and prospective plan-enabled development capacity substantially exceeds forecast growth demand.

Consequently, the proposal has not been shown to achieve the purpose of the FTTA being a regionally significant project.

- 11.7 The evidence before me also suggests that a substantial proportion of the population attracted to the development is likely to be redistributed from elsewhere within Greater Christchurch rather than representing genuinely additional regional growth. As a result, the proposal's claimed housing and economic benefits are reduced in significance when assessed at a regional scale.
- 11.8 I also place significant weight on whether the proposal delivers benefits of the scale and significance contemplated by the Fast-track Approvals Act 2024. While the proposal would provide additional housing supply and generate economic activity, the evidence does not demonstrate that it responds to an identified regional housing shortage, infrastructure constraint, or strategic development need. Rather, Council's evidence indicates that substantial development capacity already exists within planned growth areas and that much of the forecast population associated with the proposal is likely to be drawn from elsewhere within Greater Christchurch. In these circumstances, I consider the proposal's claimed regional significance is reduced and does not provide a compelling justification for departing from the established planning framework.
- 11.9 Having regard to the evidence before me, I am not satisfied that the proposal delivers regional benefits of a scale sufficient to justify the adverse impacts arising from the development. While the proposal would deliver additional housing, construction activity and investment, those benefits must be considered in the context of existing surplus development capacity, the absence of a demonstrated strategic need for growth at Ōhoka, and the significant strategic planning, transport, infrastructure, landscape and urban form concerns identified throughout this report and the technical expert's memos to the panel.
- 11.10 I regard the proposal as a substantial new urban settlement in a location that has not been identified, planned or serviced for development of this scale. The evidence does not demonstrate that the proposal would meet a regionally significant need, nor that its benefits are sufficient to justify the resulting departure from the established Greater Christchurch growth framework. Accordingly, I consider the adverse impacts identified in this report are sufficiently significant and out of proportion to the project's regional benefits, even after taking into account proposed mitigation measures and consent conditions. For these reasons, I recommend the Panel declines the application under section 85(3).

Prepared By:	 Tim Johnston Principal Resource Management Planner
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Signed By:	 Kelly LaValley General Manager Planning, Regulation and Environment