



Ōhoka Residential Subdivision Fast-track Application feedback

From Casselle Bonollo [REDACTED] >
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To Substantive <substantive@fasttrack.govt.nz>

Dear Fast track Approvals Expert Panel,

We intentionally moved our little family to Ōhoka to bring our children up within this beautiful, historic village and semi rural environment. We chose to buy here and explicitly invest in a lifestyle where our children are safe to ride their bikes, play freely at our local Domain, breathe clean air, and see the clear night skies. Ōhoka is not just any ordinary settlement; the unique history and stunning character of this village make it a treasured destination and an experience for all of Canterbury, drawing people weekly to our local farmers' market to enjoy the peace, established nature reserves, and mature trees that define the area. What we have here is irreplaceable and of immense value, yet we stand to lose all of it to satisfy a greedy developer. This is the very same developer who explicitly stated to this community that he would listen to our voices and would not pursue this project if the village did not want it, yet he has pushed ahead regardless of the record breaking number of public submissions formally lodged with the Council against this proposal. Nobody in this community wants this development; we all deeply value the lifestyle that came with our intentional decision to build our lives here.

That being said, there is far more than just sentimentality behind our absolute rejection of this proposal; our personal stakes are a direct consequence of the severe, unmitigated technical and financial failures detailed below.

As an adjacent property owner to the Carter's proposed housing development in Ōhoka, I am writing this submission out of genuine fear for my family's future and financial survival. For those of us living right next to this site, our home represents our entire livelihood, yet we are being forced to watch a private developer gamble with its safety for corporate profit. Forcing an intensive suburban footprint onto an unconfined high water table and unyielding clay soil creates severe, unmitigated flooding risks that threaten to trigger an immediate insurance retreat—leaving our home, alongside hundreds of other downstream families, completely uninsurable and financially ruined. This personal terror is not an emotional overreaction; it is the direct physical consequence of the critical information gaps, deficient localised modeling, and systemic infrastructure failures detailed below. The following technical evidence proves the applicant has failed to meet the legal burden of proof, and I implore this panel to protect our community by declining this application in its entirety.

1. INTENTIONAL DECEPTION IN FLOOD MODELLING AND VERIFIED CONSTRAINTS

The applicant's reliance on generalised, district scale macro modelling is a clear attempt to obscure the dangerous reality of this site. This development footprint sits directly on a high, fluctuating water table and tight, unyielding clay soils that are physically incapable of absorbing rapid, high density suburban stormwater runoff. Within our first 6 years in our home we have already experienced significant flooding which almost breached our already elevated floor. The developer has deliberately chosen to use broad regional maps to brush over localised vulnerabilities, the

exact structural failure that saw this inappropriate project formally reviewed and completely rejected twice before by independent commissioners.

This generalised approach directly contradicts both the expert, site-specific flood modeling commissioned from independent engineering specialists by our local Residents Association, and the rigorous independent technical assessments contracted by our District Council. The professional engineering models formally detail a severe lack of ground validation in the developer's data and prove that displacing water onto these clay lines creates an unacceptable, severe flood hazard risk to existing homes.

Even with the applicant's heavily modified amendments filed by PDP on 9 September 2026, the laws of hydrology remain unyielding. By cramming 850+ high-density lots onto this land, the developer physically lacks the surface area required to build detention basins capable of neutralising runoff. This creates a severe, deliberate displacement of flood water directly onto lower-lying, established properties in the historical Ōhoka village. The panel must address this localised reality first, rather than accepting generalised models designed to hide localised hazard propagation.

2. CATCHMENT-WIDE DOWNSTREAM CASCADES, SCALE OF DEVALUATION, AND CIVIC ACCOUNTABILITY VACUUM

The catastrophic risk of this development is not contained within the immediate borders of the Ōhoka village; it poses a direct, systemic threat to highly vulnerable downstream catchments, scaling into a regional economic disaster. Stormwater and displaced groundwater from the proposed 154-hectare footprint naturally follow the low-lying regional topology directly into the wider drainage network feeding urban residential zones, most notably the high-density Silverstream subdivision and West Kaiapoi catchment areas.

When evaluating the physical and financial realities of this catchment, this panel is not looking at an isolated neighborhood dispute, it is looking at an imminent threat to the housing and insurance stability of roughly 600 to 1,000+ existing homes.

THE CASCADE OF RESIDENTIAL INSURANCE RISK:

- * Immediate Impact Zone (Ōhoka Village):
 - Approximately 130 to 150 lifestyle homes.
 - High water table and clay soil lines.
 - Immediate, localized 45mm flood risk displacement zone.
- * Downstream Compounding Zone (Silverstream & West Kaiapoi):
 - Approximately 500 to 800+ high-density properties.
 - Delicate, low-lying managed network.
 - Vulnerable to systemic infrastructure overload and backing up.

The applicant's brand-new 9th September 2026 amendments explicitly admit to "significant inflow during flooding events" into the local wastewater network. By forcing an unsustainable, high-density suburban footprint onto unyielding clay soil upstream, the developer will inevitably overload the downstream capacities of the Waimakariri District Council infrastructure. When these systems back up, private global insurers will utilise automated, localised street-by-street risk profiling to protect their capital. They do not require regulatory permission to issue an immediate insurance retreat either by stripping flood coverage entirely or skyrocketing premiums to un-payable levels to force a voluntary policy drop.

The economic and civic reality of this scenario represents a catastrophic national precedent:

- * The Scale of Capital Destruction: If 600 to 1,000 homes lose their insurance coverage, they instantly become un-mortgageable. This strips their asset value down to zero, erasing hundreds of millions of dollars in generational family equity overnight.
- * The Absolute Vacuum of Civic Accountability: The fast-track mechanism creates an engineered loophole where nobody is legally responsible for the fallout. The developer takes the massive profit from the rural-to-residential land value lift, winds up their specific project company, and walks away with zero long-term liability for the local insurance market's reaction. The Council cannot be sued because they explicitly opposed the development and warned of infrastructure gaps out to 2032. Central government holds legislative immunity for market-driven insurance pullbacks.
- * The Burden Trapped on Ratepayers: The financial ruin is left entirely with individual property owners who face sudden asset worthlessness, alongside local ratepayers who will be forced to fund multi-million-dollar emergency engineering remediation projects down the line.

3. SEVERE RISK OF "INSURANCE RETREAT" AND FINANCIAL RUIN FOR EXISTING RESIDENTS

As an adjacent property owner, my greatest and most urgent concern is the imminent threat of insurance retreat. In New Zealand's current economic and regulatory climate, major global insurers (including IAG, Tower, and Suncorp) have aggressively pivoted to localised, property-specific risk profiling.

There is clear precedent for this in New Zealand (notably seen in flood-affected parts of Hawkes Bay, Auckland, and Edgumbe), where human-altered hydrology or unmitigated upstream developments have triggered immediate insurance retreat or skyrocketing, unaffordable premiums for adjacent properties.

By forcing an unsustainable, high-density development onto an unconfined high water table, this panel risks rendering the surrounding established village homes entirely uninsurable. Because neither the developer, the council, nor the central government carries civil liability for market-driven insurance pullbacks, local residents are left to pay for private corporate profits with their entire livelihoods. An uninsurable home loses all asset value, rendering generations of families financially ruined. The panel has a binding duty of care to protect existing communities from manufactured economic ruin.

4. EVIDENTIARY ADMISSIONS OF SYSTEMIC INFRASTRUCTURE FAILURE RISK

The applicant's brand-new supplementary filings (Appendix 22 and Appendix 28a, dated 9/9/26) provide clear evidentiary admissions that validate the community's worst fears.

- * The PDP wastewater memo explicitly records the presence of a high water table directly impacting their structural designs.
- * Their data acknowledges "significant inflow during flooding events" to the wastewater network.

Multiplying this operational strain across 850+ new houses creates an unavoidable risk of systemic infrastructure failure and localised contamination. Crucially, the applicant's mitigation strategy relies on WDC Stage 2 infrastructure upgrades that are not scheduled or funded to exist until 2032. Approving an 850-home footprint that hooks into an already vulnerable local network six years before structural upgrades are complete will cause immediate, severe operational failure. The

financial burden of correcting these network failures will be unfairly forced onto the existing local ratepayers who derive zero benefit from this private development.

5. FAILURE TO MEET THE THRESHOLD OF NATIONAL SIGNIFICANCE AND CONFLICT WITH DISTRICT PLANNING

The Fast-track Approvals framework was strictly legislated to facilitate projects of genuine national or significant regional significance. This private, profit-driven subdivision does not fit this category, and political rhetoric cannot mask its isolation.

The Waimakariri District Council (WDC) has already meticulously assessed the region's land through its standard District Plan process, deliberately selecting appropriate, serviced urban boundaries to comfortably meet long-term housing demands. This isolated, out-of-boundary patch of rural land is entirely unnecessary to meet district targets. There is no shortfall in local housing supply that justifies bypassing local democracy, and any minor economic stimulus or short-term construction revenue generated by this development is completely cancelled out by the permanent, catastrophic destruction of livelihoods, assets, and safety in the surrounding community.

6. HYDROGEOLOGICAL VULNERABILITY: THE FIRST AQUIFER

The applicant has completely failed to meet the legal burden of proof regarding water safety. The Panel Convener, Jane Borthwick, has already formally recorded that no test bores or localised flow testing have been undertaken for the proposed community water supply.

This high-density development directly threatens the shallow, unconfined first aquifer that every local household bore draws from. The applicant has provided zero long-term hydrogeological modeling to exclude the risk of drawdown or contamination to our community's primary water source. Because they are legally locked out of the heavily overallocated deep second aquifer by Environment Canterbury (ECan) allocation limits, they have no viable, safe, or legally compliant water source.

7. THE DESTRUCTION OF LOCAL DECISION-MAKING AND WASTE OF SUBSTANTIAL RATEPAYER CAPITAL

This fast-track application represents a direct and deeply frustrating assault on the core principles of local democracy and local decision-making. The Waimakariri District Council has already meticulously evaluated this exact 154-hectare footprint twice before. Acting in accordance with its long-term Rural Residential Development Strategy—which deliberately discounted Ohoka for high-density growth due to verified flooding hazards—the Council formally rejected this proposal twice for very clear, evidence-based planning reasons. This was a democratic process backed by a record-breaking 648 public submissions, of which an overwhelming 96% were firmly opposed.

The financial cost of defending our village from this aggressive proposal has placed a massive, unfair burden on local ratepayers. Running a comprehensive, multi-week independent panel hearing under the Resource Management Act is a major financial undertaking. Between contracting independent expert lawyers, commissioning independent hydrology peer reviews, employing engineering reporting specialists, and paying the hourly fees of high-level independent commissioners, hearings of this magnitude routinely cost local ratepayers hundreds of thousands of dollars.

Furthermore, this proposal completely ignores the district's strategic, long-term infrastructure investments. The Waimakariri District Council has been working in lockstep with the community to establish the draft North East Waimakariri Urban Plan, deliberately positioning future high-density growth cells in Woodend, Ravenswood, and Pegasus. This is precisely where central government has just fully committed 800 million dollars to construct the massive new Belfast to Pegasus Motorway and Woodend Bypass. Sensible, sustainable urban planning requires that high-density housing developments be integrated alongside these massive public transit investments to utilise modern freight, roading, and service networks. For the developer to reject these designated urban corridors and attempt to dump an 879-lot urban density footprint in the middle of a rural paddock, completely isolated from highway networks and dependent entirely on quiet country roads, defies all logic.

For the developer to simply discard that exhaustive, locally funded democratic outcome and use a fast-track political backdoor to force this un-serviced, flood-prone footprint onto our community is highly inappropriate. It strips away our community's self-determination and forces local ratepayers to absorb enormous, compounding financial losses just to protect our homes from private corporate gain. The panel must honor the rigorous local assessments already conducted at great public expense, align development with the district's actual motorway infrastructure investments, and decline this application.

CONCLUSION AND DIRECTIVE TO THE PANEL

The Fast-Track Expert Panel must not allow the applicant to substitute empty engineering promises for hard, baseline physical data. The fatal constraints that saw this project rejected twice before remain entirely unresolved by the 9th September 2026 amendments. I strongly implore the Panel to uphold the local council regulations, protect our community's water and financial insurability, and decline the application in its entirety.

Yours sincerely,

Casselle Bonollo

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