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12 October 2026

Ōhoka Residential Subdivision Fast-track Panel Convener

Copied to:

Hon Chris Bishop

Minister for Housing, Minister for Transport, and Minister Responsible for RMA Reform

By email, Chris.Bishop@parliament.govt.nz

Dear Panel Convenor

Ōhoka Fast-track Residential Proposal

We are writing representing our Council and community, to formally oppose the Ōhoka residential development proposal currently being considered under the Fast-track Approvals Act 2024.

The Council's position has been consistent: Ōhoka is not an appropriate location for large-scale residential development, and this proposal should be declined.

This is not a proposal that has lacked scrutiny.

The land has already been considered through two planning processes: a private plan change (RCP-031) to the now superseded district plan and the Council's District Plan review process.

In both cases, a panel of independent commissioners found the site was not suitable for the scale of development proposed as, overall, it was found that it would not constitute a well-functioning urban environment.

Nothing material has changed to justify reconsidering this development through a constrained process without the ability to properly consider community input.

Considering the same proposal but through Fast-track risks overriding years of careful planning, public participation and local decision-making.

Waimakariri District is not opposed to growth. We have planned for it carefully and transparently.

Our recently adopted District Plan identifies where future development should occur and what land is appropriate for growth. When adopted, the District Plan anticipated accommodating up to 17,000 additional homes over the next 30 years, providing for close to 50,000 new residents. However, recently updated housing capacity assessment figures (August 2026) suggest this is closer to 20,000 homes.

Council understands that across the wider Christchurch Urban Environment, housing capacity in the medium term is more than three times the projected demand.

The issue is not whether Waimakariri should grow. The issue is how and where that growth occurs.

The view of Council and the community is that growth should be directed to locations identified through proper planning processes, where roads, infrastructure, schools, services and community facilities can support it. Ōhoka does not meet that test. The scale of the Ōhoka proposal essentially proposes a new town bigger than Oxford, but without any of the established services that communities rely on.

The proposal raises significant concerns about stormwater, drinking water supply, wastewater servicing, transport impacts, flood risk, rural character and the long-term ability of existing infrastructure to efficiently support a development of this scale.

The Council considers the Applicant's stormwater modelling is currently inadequate, in part because it is very difficult to do given the high water table and ground water resurgence in the area. This introduces considerable uncertainty over the potential impacts and costs, which may not fully emerge for many years.

By way of example, the Council is currently exploring drainage solutions for the neighbouring Mandeville area, with estimates to resolve the issues in the range of \$20-\$30 million. This is a significant cost to ratepayers in a funding constrained environment.

Because of the inherent modelling uncertainties and challenging groundwater environment, comparable improvements may also be required for Ōhoka in the future.

Council notes that if stormwater is not adequately managed there will also be considerable effects on downstream communities such as Silverstream and Kaiapoi, which were not anticipated or planned for, and will fall to the Council to resolve at the ratepayers' expense.

Ōhoka already has roading, drainage and servicing constraints. Any proposal for significant increase in demand created by hundreds of new residential sections would need to clearly demonstrate how those issues can be resolved without unacceptable costs, risks or consequences for the existing community. Council does not consider that threshold has been met.

Council estimates the required transport upgrade costs to be in range of \$35 to \$52 million (excluding additional costs necessary with the replacement of Skew Bridge on Skewbridge Road – also estimated at up to \$20 million).

No significant Council transport funding, or NZ Transport Agency, is currently proposed for Ōhoka as the area is remote and there is a high cost to deliver transport services and improvements to this area. The timing of application for funding and delivery is also out-of-sync and unlikely to be developed in sync causing significant issues for the wider District transportation network.

The level of community opposition is also significant. Thousands of people have signed a petition against the proposal. That reflects strong and genuine concern from residents, not just the small group of directly affected neighbours who are invited to comment through this process.

Fast-track bypasses normal consenting and decision-making under the Resource Management Act, including the usual avenues for community participation. While councils have limited input and representation, the final approval decision sits with an independent expert panel.

That is precisely why proposals of this nature should not be relitigated through Fast-track when they have already been tested and rejected through proper planning processes that incorporate community input.

Council also does not accept that the claimed housing and economic benefits outweigh the planning, infrastructure and community concerns raised by this proposal.

In fact, we believe the costs of providing infrastructure in this location due to its remoteness to other urban areas will outweigh any economic benefits and those costs will be borne by our ratepayers.

Importantly, the housing benefit is identified as gross, rather than net, as per the applicant's own words, and as such, the underlying demand "would still be accommodated elsewhere within the south-eastern Waimakariri District or surrounding settlements."

Council's experts consider 90-95% of the gross construction activity would occur elsewhere in the district or region if the proposal did not proceed, leaving only 5-10% as net additional.

Therefore, the vast majority of the claimed regional benefit is simply a transfer from Rangiora, Kaiapoi and Woodend where infrastructure and transport corridors are in place and readily available, and servicing housing in these areas will not come with such unplanned and significant costs for ratepayers. This proposal creates little new value.

Council also understands that the development is likely to take considerably longer than the developers assumed ten-year period, thereby further reducing both its annual value and its significance.

At this scale and timeframe, the proposal would make no meaningful difference to economic activity at either the district or regional level. Overall, the proposal's costs are likely to outweigh its relatively small regional economic benefits.

The district already has sufficient planned capacity for substantial future growth. That growth is better provided for in locations where infrastructure can be and is planned efficiently, where natural hazard risks are better understood, and where development aligns with the District Plan and the community's expectations.

Approving a large urban scale residential development in a rural location like Ōhoka through Fast-track would undermine the integrity of local planning, put significant infrastructural costs on current and potentially future ratepayers, and send a clear signal that decisions made through transparent statutory processes can simply be relitigated through an alternative pathway.

For these reasons, Waimakariri District Council requests the Ōhoka proposal be declined.

It is not consistent with good planning, it does not reflect the outcomes of the Council's recent District Plan process, it seeks to relitigate two independent processes which have already found this proposal lacking, and it would place unacceptable pressure on a rural community.

This matter is important not only for Ōhoka, but for the wider Waimakariri District. Residents deserve confidence that decisions about where communities grow will be made through open, evidence-based and locally informed processes.

For the above reasons, Council requests that the proposal be declined. By any measure this proposal does not meet the threshold of being of regional or national significance. Furthermore, it has already been declined twice already, is opposed by the community, and will cause an infrastructural burden the ratepayers of Waimakariri will need to carry without consultation, input or consideration.

Yours sincerely,



Mayor Dan Gordon



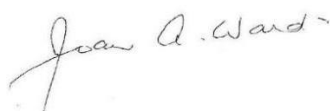
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Chief Executive



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