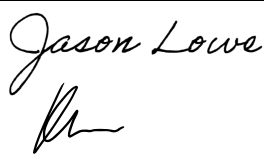


COMMENTS ON FTA231

Ōhoka Residential Subdivision

Jason and Karen Lowe | [REDACTED]

Organisation	Jason and Karen Lowe Family Trust
Names	Dr Jason Lowe and Mrs Karen Lowe
Postal address	[REDACTED]
Mobile phones	[REDACTED]
Email	[REDACTED]
Communications	We can receive draft conditions and further communications by email.
Date: 11th October 2026	Signed: 

1. Introduction: why this proposal directly affects us

Summary: We chose Ōhoka deliberately for its equestrian rural lifestyle and small village community, while remaining within workable reach of our Christchurch-based business and our family's Catholic schooling. The applicant's proposal would materially alter the very reasons we bought our home and adversely affects us and our property.

We purchased [REDACTED] in March 2026 after the proposed large-scale development had been declined through two earlier planning pathways. We understood that we were purchasing into an established rural and equestrian environment. Had we known that the same proposal would be advanced again through the Fast-track process, we would not have purchased this property.

Our objective was specific: to establish an equestrian lifestyle close enough to Christchurch for us to continue operating a Christchurch-facing business and to maintain Catholic secondary schooling. There is no Catholic secondary school in Waimakariri, so regular travel to Christchurch is not optional for our family. We accepted the existing rural commute because it was balanced by the space, quiet, safety, privacy and equestrian amenity in the beautiful historic village of Ōhoka. The proposal would remove that balance by increasing congestion and travel costs while also urbanising the environment we moved here to enjoy.

The effects on us are therefore not abstract. They affect the use and enjoyment of our home; the welfare and safe management of our horses; our drinking-water security and flood exposure; our ability to obtain adequate insurance; our daily travel and business costs; our family's schooling; and the safety of our family, neighbours and friends. The proposal materially undermines our confidence that the historic village of Ōhoka will remain a viable and desirable place for us to live.

We ask the Panel to give particular weight to these direct effects. The Ōhoka Residents' Association (ORA) has separately given expert input on technical matters. Our comments focus on what the proposal means for our property, family, livelihood and way of life.

2. Flooding, drainage and the safety of our home

Summary: Flooding is recent, local and documented at our property and neighbouring properties. If the applicant's assumptions prove incomplete or incorrect after hundreds of houses, roads and raised building platforms are constructed, the consequences will fall on existing residents long after the developer has completed and sold the subdivision. We do not have confidence in the applicants modelling as it does not provide certainty that our property and others will not be adversely affected.

The LIM for [REDACTED] records serious flooding on 13 July 2022. The Council service request states that paddocks were “running like rivers”, and that the workshop and sleepout flooded. It also records that the workshop flooded despite investment previously on preventative works. Further flooding was recorded later that month, and in August 2022 the road culvert walls were reported to be “collapsing after flooding”.

Approximately \$15,000 was privately invested by the previous owners in 2023 to install additional stormwater mitigation measures, including digging a swale across the back of the property, and installing sumps, pumps and drainage pipes (see images in Appendix). Even during relatively minor rainfall events, such as those experienced this winter, these systems are required to remove substantial volumes of water from the rear of the property.

We are now investing many tens of thousands of dollars to raise the sleepout floor level from 225 mm to 400 mm, in line with current council minimum floor height recommendations. These measures are intended to improve resilience. However, given our recent experience and the area's documented flooding history, future flooding is not a remote possibility. We remain deeply concerned that changing the Ōhoka landscape through extensive building platforms, roads and other impermeable surfaces could worsen flooding at existing properties like ours. In our view, the applicant has not adequately addressed that concern. While the timing and severity of future events remain uncertain, the documented history means that recurring flooding must be treated as a foreseeable risk rather than dismissed as an “unprecedented”, “unlikely” or “one-in-200-year” event.

This history matters to us personally. Our main house, like many existing Ōhoka houses, was built more than 20 years ago with lower floor levels than the current council guidelines. The potential effect of runoff from more than 800 raised building sites, together with associated roads and infrastructure, must be properly assessed and taken into account by the Panel, particularly because existing homes were built to earlier floor-level standards.

We live immediately beside the roadside drain, and the open drains on our property rely on the surrounding drainage network to carry water away from our home, outbuildings and paddocks. Our property is used for horses, so prolonged saturation, rapidly moving water, unstable drain edges and contaminated standing water create both property and animal-welfare risks. In our view, these effects have not been adequately addressed for either the short or long term and should be resolved before any approval is granted.

Existing condition of the Whites Road drain

The photographs attached to this submission (see Appendix), taken on 29 September 2026, show slumping, erosion and instability along sections of the roadside drain beside Whites Road. Whites Road is a rural road that falls towards this drain. The drain is not a decorative feature; it is part of the practical flood-management system protecting adjoining land. Simply “widening” this rural road to accommodate construction traffic and increased long-term use is not as simple or practicable as suggested in the proposal and would not, by itself, resolve the drainage constraint. Any widening proposal would need to address the open drains, bank stabilisation and ongoing maintenance. Those costs should be identified as project-related costs and

addressed before any of the subdivision land is touched and should not be transferred to existing ratepayers down the track once the developer has begun work.

We are concerned that years of construction traffic, heavy trucks carrying fill, increased residential traffic and altered stormwater behaviour may also accelerate deterioration of the road edge and drain. We have already seen the deterioration on rural roads in many areas locally, where trucks have been permitted to carry gravel from the Waimakariri River. These roads were not designed for sustained heavy-truck movements or the substantial increase in traffic that the subdivision would generate. A collapse, blockage or loss of capacity could increase the speed and depth of local flooding at our property. It could also undo any past private and Council investment in flood mitigation. We do not consider that the applicant has adequately accounted for, or accepted responsibility for, the effects on the structural integrity and maintenance of rural roads, drains and bridges used by existing Ōhoka residents and funded by ratepayers.

Climate Change and limits of prediction

In our view, the question that should be answered is not simply whether additional housing can technically be engineered at Ōhoka, but whether placing approximately 879 additional residential lots on this particular low-lying site in a small rural village increases long-term exposure and infrastructure liability in an area where flooding and drainage limitations are already documented.

We recognise that engineering modelling is necessary. Our concern is that modelling remains an estimate based on assumptions about rainfall, groundwater, infiltration, maintenance and how multiple systems perform together. Climate Change adds further uncertainty because the frequency, intensity and interaction of the hazards on which those models depend are themselves changing.

This concern is supported by the Climate Change Commission's 2026 National Climate Change Risk Assessment, which identifies water infrastructure as one of New Zealand's most significant climate-related risks. The Commission concludes that "drinking-water, wastewater and stormwater infrastructure face increasingly severe risks from extreme rainfall, river flooding, drought, heatwaves and sea-level rise". It also notes that "exposure is heightened in low-lying areas (e.g. Canterbury)" and that "failures in one part of the water system can cascade into others".

These findings are directly relevant to us as owners of an already flood-affected, low-lying property that depends on private groundwater and existing roadside drainage. They reinforce our view that historical rainfall patterns and modelled design events should not be treated as providing certainty about future performance. The consequences of under-estimation are asymmetric: the developer can complete and sell the development, while neighbouring owners remain exposed to flooding, property damage, water-quality deterioration, insurance consequences and additional mitigation costs for decades.

The significance of climate change therefore cannot reasonably be separated from the Panel's consideration of long-term flooding, groundwater, infrastructure and property risks. The issue is not whether any individual future event can be predicted with certainty, but whether the proposal has demonstrated sufficient resilience to foreseeable conditions over the lifetime of the development.

The waterways and ditches around our property already show signs of stress and poor condition. The ORA background material also records that the applicant's aquatic ecology assessment found all seven stream sites assessed failed the national minimum health standard, with zinc and copper exceedances at some sites. In our view, this makes it unsafe to assume that the receiving environment has spare resilience for substantially more urban runoff.

In summary, given the documented flooding history at our property, the existing poor condition of waterways within the catchment, and the acknowledged uncertainty associated with groundwater and climate conditions, we submit that independent peer review and precautionary assessment are essential before any approval is even granted.

What we ask the Panel to require

- Independent, climate-adjusted peer review of the flood, groundwater and stormwater assessments before approval, not after consent.
- Property-specific assessment of effects on [REDACTED], including the roadside drain, culverts, overland-flow paths, paddocks, outbuildings and private well.
- A legally enforceable requirement that the development does not increase peak flow, flood depth, flood duration or erosion risk at our property.
- Baseline photographic and engineering inspection of the Whites Road drain and road edge before construction begins, followed by monitored condition surveys during construction.
- Clear responsibility, funding and rapid remedial obligations if the road, drain, culverts, groundwater or our property are adversely affected.

3. Drinking-water security, wastewater and dewatering risk

Summary: Our home and animals depend on a private well. We are not aware from the applicants documentation that sufficient deep-aquifer field testing has been undertaken at the proposed development site, and we understand that significant parts of the assessment rely on modelling and available monitoring data. We are therefore concerned about what would happen if our bore were contaminated, experienced reduced yield or were otherwise affected by construction, dewatering, new abstraction, stormwater or wastewater infrastructure. The applicant has not, in our view, demonstrated with sufficient certainty that existing neighbouring bores will continue to provide adequate, safe and clean water during construction and after completion of the subdivision. If groundwater quality or reliability is affected, we do not have a simple alternative supply. The applicant should therefore demonstrate, before approval, that the development will not adversely affect existing wells, groundwater levels, ground stability, waterways or the reliability and quality of our water supply.

3.1 Our direct dependence on groundwater

Our property is not connected to a Council drinking-water or wastewater network. We rely on a private well for household water, stock water and paddock irrigation. Following recent water-quality testing, we invested around \$6,000 in upgraded filtration systems (photos attached). We also anticipate that further investment may be required in water-storage tanks to provide continuity of supply if our bore is compromised during a major runoff, flooding or contamination event. These are significant costs already being borne by us before any effects from the proposed development occur.

For us, groundwater is not simply a technical resource identified in a model. It is the sole source of water for our home and animals. If its quality, level or reliability is affected, we cannot simply connect to an existing Council supply. Any interruption, drawdown, contamination or change in bore performance would have immediate practical, animal-welfare and financial consequences.

3.2 Wastewater and contamination pathways

The proposal introduces new wastewater infrastructure, stormwater systems, earthworks and a substantially larger population into an area where groundwater is shallow and neighbouring properties rely on private wells. We are concerned about the consequences of pump failure, overflow, leakage, cross-contamination,

emergency discharge or stormwater and wastewater systems being overwhelmed during extreme rainfall events. These risks should be assessed as interconnected pathways rather than as isolated systems.

The 2026 National Climate Change Risk Assessment supports our concern. The Climate Change Commission identifies water infrastructure as one of New Zealand's most significant climate risks and records increasing risks to potable-water supply and water quality from extreme rainfall, river flooding, drought and other climate hazards. It also notes that failures in interconnected water systems can cascade, including contamination when wastewater and stormwater systems are overwhelmed.

3.3 Dewatering and unintended groundwater effects

The applicant has indicated that large-scale earthworks and construction below or close to the water table will require dewatering. Our understanding is that dewatering is not merely the removal of inconvenient construction water. It deliberately alters groundwater conditions, at least temporarily, and may influence groundwater gradients, nearby bore performance, the movement of contaminants, discharge volumes and the behaviour of shallow groundwater around existing land and infrastructure. The location, rate, duration and cumulative extent of any dewatering therefore matter directly to us.

S-map information from Manaaki Whenua – Landcare Research identifies Gley and Pallic soils in and around our property ([Gley Soils \[G\]](#) » [New Zealand Soils Portal - Manaaki Whenua - Landcare Research](#)). Gley soils are strongly affected by waterlogging and are commonly associated with high groundwater tables, while Pallic soils are characteristically wet in winter and have relatively slow permeability. These soil and groundwater characteristics reinforce our concern about how the land may respond to changes in groundwater levels, drainage and dewatering. In an area already affected by shallow groundwater and documented flooding, we are particularly concerned about whether construction-related dewatering could contribute to changes in ground conditions, settlement, drainage behaviour or flood risk. We therefore consider that these risks should be specifically investigated through site-specific hydrogeological and geotechnical assessment, rather than assumed to be adequately addressed by general modelling.

Furthermore, the Water New Zealand paper “Unintended Consequences: Groundwater, Climate Change, Urban Development, and Improving Infrastructure” by Helen Rutter, Kolt Johnson and Simon Cox explains that shallow groundwater can fluctuate significantly in response to seasonal recharge, storms and river flooding. It notes that groundwater can contribute to surface flooding, dewatering requirements, roading damage and infrastructure problems, and that groundwater behaviour can be spatially and temporally complex. The authors also caution that changes intended to improve drainage or infiltration can have unintended consequences if local hydrology and hydrogeology are not properly understood.

The paper is particularly relevant to us and the proposal because it explains that urban impermeable surfaces generate proportionally more stormwater, while infiltration and stormwater-disposal measures can concentrate recharge in particular locations. It also warns that shallow groundwater may limit the effectiveness of infiltration-based measures and that increasing infiltration can raise groundwater levels and contribute to surface flooding. The authors conclude that a holistic understanding of drivers and cascading effects is required before infrastructure is changed, urban areas are expanded or stormwater is diverted to ground.

We do not assert that dewatering will necessarily damage our property. We submit that the applicant has not yet provided sufficient property-specific evidence to exclude adverse effects on our bore, land, buildings, roadside and private drains, or nearby waterways. Those matters should not be deferred to construction-stage management after approval has been granted.

We are also troubled that important details in the applicant's proposal to address ground water, run-off, flooding and contamination events appear to remain dependent on future design, monitoring, or Council arrangements, without final arrangements yet in place. Once development is occupied, any pump failure,

overflow, contamination event or unexpected groundwater effect will be a real event affecting us directly. We ask that these matters be resolved before approval and that enforceable monitoring, response and compensation mechanisms protect existing well owners like us.

3.4 Evidence and protection we ask the Panel to require

- Independent peer review by suitably qualified hydrogeological and geotechnical specialists of the proposed dewatering methodology, including its location, depth, rate, duration, discharge destination and cumulative interaction with abstraction, stormwater and wastewater systems.
- A pre-construction baseline survey of groundwater levels, bore yield and water quality at [REDACTED] and other potentially affected neighbouring properties, using an adequate monitoring period to capture seasonal variation.
- Property-specific assessment of drawdown, groundwater-flow changes, contaminant migration, ground settlement and effects on existing buildings, roads, culverts, drains, waterways and private wells.
- Clear evidence that any dewatering discharge can be managed without erosion, sediment release, flooding, water-quality deterioration or transfer of risk to neighbouring land and waterways.
- Trigger levels, continuous or appropriately frequent monitoring, independent reporting, stop-work requirements and immediate remedial action if groundwater, settlement, bore performance or water quality changes beyond agreed limits.
- A funded contingency supply for affected households and animals if an existing bore becomes unavailable, contaminated or unreliable, together with enforceable repair, replacement and compensation obligations.
- Long-term post-construction monitoring sufficient to identify delayed or seasonal effects, rather than ending monitoring when earthworks are complete.

These requirements should be resolved before approval and secured through enforceable conditions. Reliance on future design, monitoring plans or Council arrangements would otherwise leave existing residents like us carrying the consequences and costs if the applicants assumptions later prove incorrect.

4. Loss of rural historic village and equestrian character

Summary: The proposed development does not preserve our equestrian lifestyle by including a polo ground. It would displace and constrain the diverse, established equestrian activities that already define this area. The applicant's proposal will also destroy the historic village character of Ōhoka.

The equestrian character of this property and locality was central to our decision to buy. The LIM records stables, a haybarn, Standardbred training and agistment use, and historic Council approval of horse-training activities. This is a genuine, established equestrian property and surrounding landscape.

In more than 30 years as an equine veterinarian, I have worked across the equine industry worldwide and understand the land, access, calm environment and supporting services needed to keep and work horses safely. Ōhoka currently accommodates hundreds of sport and performance horses, recreational riding, Western disciplines, training, agistment and associated rural businesses. These activities are part of the real economy and identity of the Ōhoka area.

Polo is a very specialised, resource-intensive discipline and is not representative of the most accessible or common equestrian activities in New Zealand. A proposed polo ground does not compensate for replacing broad rural equestrian land with dense housing, roads, street lighting and a commercial centre or retirement village in our rural environment. Nor does it protect existing owners like us from reverse-sensitivity complaints

about horses, early-morning work, floats, arenas, lights, dust, livestock noise or normal rural activity, including smoke from bonfires and noise from agricultural equipment.

For us, the loss would be practical as well as visual. More traffic would make horse-float movements harder. Roadside riding would become less safe. Street lighting, household lighting and traffic would remove the dark rural setting. Increased density would bring more dogs, cats, fireworks and unfamiliar activity around livestock and our horses. These are recognised sources of acute risk around horses because sudden noise and light can cause panic, fence injury and escape. The development would therefore make day-to-day horse management more difficult, threaten their welfare and reduce our enjoyment and confidence in the property.

We strongly disagree with the applicant's position that the proposed development does not affect the historic village of Ōhoka and that this subdivision benefits the locals that currently live within it. The subdivision, regardless of size or scope, would significantly change the rural landscape and lifestyle for all of us as residents, and would undermine the essence of the historic rural village.

5. Traffic, family travel, safety and business impacts

Summary: The proposal would worsen the cost, duration, reliability and safety of journeys that are essential to our family. Roundabouts may manage selected intersections, but they cannot remove thousands of additional trips or the downstream constraint at Tram Road and SH1.

We use Whites Road and Tram Road for access to Christchurch, our business activities and Catholic secondary schooling. Our travel is therefore regular and necessary. The applicant's Integrated Transport Assessment predicts 6,046 vehicle movements per day at full development, including 624 movements in the AM peak and 715 in the PM peak. It identifies Tram Road / Whites Road as high risk and predicts the AM-peak right-turn movement from the SH1 / Tram Road off-ramp would be over capacity with development traffic, which is particularly concerning as current wait times can already be 5 to 10 minutes at peak AM traffic.

The on and off ramps associated with SH1 surrounding Ōhoka are already predicted to see increased traffic volumes as a result of the Woodend bypass and Rangiora bypass as they feed the numerous subdivisions proposed and being built north and east of Ōhoka. Now add the additional traffic generated by up to 6,046 vehicle movements per day from this proposed subdivision and our commute into Christchurch will become untenable if this subdivision goes ahead. We have no other options for transport, unlike the established towns of Kaiapoi and Rangiora with already established bus links into Christchurch. We also note that significant traffic and safety concerns have been highlighted by Ōhoka School (see Appendix: Ōhoka School Infrastructure Impact Assessment report) in relation to the applicant's proposal.

We are also concerned about access from the northern side of Whites Road onto Tram Road. A roundabout may not resolve the practical difficulty because vehicles entering from Whites Road would still need to give way to traffic approaching from the right on Tram Road. Increased traffic may make it materially harder to find a safe gap to enter or cross Tram Road. This is already difficult for vehicles towing horse floats, trailers and agricultural equipment because they accelerate slowly, are longer, and require larger gaps. We have observed near misses on the corridor to SH1. More traffic increases exposure at every conflict point along Tram Road between Whites Road and SH1, not only at the intersections selected for upgrade. Roundabouts might improve operation or safety at a particular location, but they do not remove the additional vehicles. Traffic released from one intersection still reaches the next intersection and the SH1 interchange. The cumulative interaction with growth elsewhere in Waimakariri, including east Rangiora and the Rangiora Eastern Link, should be assessed rather than treating this proposal as isolated.

The personal and business cost of congestion

Congestion has a double cost for us: more time is spent travelling, and more fuel is consumed while vehicles move slowly or queue. Fuel, vehicle ownership, maintenance and road-user costs are already material business and household expenses. Any future increase in fossil-fuel costs would magnify the burden of a car-dependent development and the delay it imposes on existing commuters.

For our Christchurch-facing business, unreliable journey times affect appointments, staff time, deliveries and the practical value of operating from Ōhoka. If congestion and access became materially worse, we would have to reconsider whether the district remained a viable base for the business. That is not a threat or a certainty; it is a genuine commercial consequence of making access to Christchurch slower, less predictable and more expensive.

Safety

We also ask the Panel to recognise that serious injury and death are foreseeable consequences of increased traffic exposure on a high-speed rural corridor with multiple side roads, crossing movements, slow agricultural vehicles and trailers. This concern is also raised in the Ohoka School Infrastructure and Traffic Impact Assessment report (see Appendix).

Capacity modelling alone does not describe the lived safety effect for us trying to enter or cross Tram Road. The assessment should include cumulative crash risk, available gaps, queueing, construction traffic, school travel and the needs of long and slow vehicles.

The impact of increased traffic flow on the two narrow bridges on Ashworth/Plaskett Road and Flaxton Road over the Cust river is also of great concern for us. These are rural bridges that were designed principally for rural and farming traffic. We are concerned that substantial increases in traffic and heavy-vehicle movements may accelerate deterioration or require strengthening or even replacement. If strengthening, maintenance, repair work or replacement is required because of development-generated traffic, these costs should be attributed to the development rather than transferred to existing residents and ratepayers. This should be assessed and addressed before any approval is granted.

6. Construction, noise, lighting and day-to-day wellbeing

Summary: For neighbouring residents, a staged development of this scale would mean years of disruption, not a short construction inconvenience.

We would experience heavy vehicles, earthmoving machinery, reversing alarms, dust, mud, vibration and road-edge damage over an extended period. Transporting sufficient fill to raise building platforms on this low-lying site would add repeated heavy-truck movements to a rural road beside a vulnerable drain.

Traffic noise and vibrations are already audible and disruptive at our property. We have invested \$54,000 to install double glazing and we anticipate potentially needing an acoustic roadside fence even in the current situation. Thousands of additional daily vehicle movements would absolutely change the acoustic character of our home and paddocks, including early mornings, evenings and weekends. New street lighting and household lighting would replace dark rural night conditions. This affects our use and enjoyment of our property and the calm environment in which our horses are kept. For horse owners, these are not minor sensitivities. Sudden noise and unfamiliar activity can cause injury, escape, damage to fencing and prolonged animal-management problems. These are direct costs and significant welfare concerns that must be taken into account by the panel.

Higher residential density would also substantially increase the likelihood and frequency of fireworks, loose dogs and other urban-rural conflicts. The development may also disturb established birdlife and habitat that Ōhoka residents have worked to encourage at the Ōhoka Domain and in private gardens, including our own property. We are concerned about the potential for disturbance, habitat loss and displacement. Local residents have documented kererū, bellbirds, owls, kingfishers, fantails, silvereyes and even Canterbury cave wētā. Personally at [REDACTED] we enjoy an extensive gardens in a rural environment, which would be substantially threatened by this proposal.

7. Insurance, property value and financial security

Summary: Our home is our major asset. Any increase in perceived flood, access or amenity risk may affect insurance, finance, saleability and value, even if physical damage has not yet occurred.

Obtaining insurance for [REDACTED] was difficult because of the property's 2022 flood history. Cover was ultimately available through our longstanding relationship with Medical Assurance Society who only insure professionals. That experience has made us acutely aware that insurers and lenders may respond to risk differently from planning maps or consent conditions.

If flood exposure, drainage dependence or groundwater uncertainty increases, or is perceived to increase, we may face higher premiums, exclusions, larger excesses or reduced availability of cover. Because mortgage finance generally depends on insurability, this can also affect saleability and equity.

Our concerns about insurance and the financial security represented by our home are not hypothetical or unique to us. The Climate Change Commission identifies buildings as one of New Zealand's most significant climate-related risks. Its 2026 assessment reports that more than 556,000 buildings are currently exposed to inland flooding nationally, representing approximately \$235 billion in value, with Canterbury identified among the particularly exposed regions.

The Commission also recognise that, for many New Zealanders such as us, our home is our principal financial asset and that climate risk to residential buildings can therefore become a risk to our financial security and wellbeing. It notes that insurance is becoming more expensive and increasingly tied to location as climate risks increase, with a longer-term trend towards risk-based pricing creating affordability and availability challenges for higher-risk properties. As said, we have already had trouble obtaining insurance because of the documented 2022 flooding at this property. Against that background, it is reasonable for us to be concerned about any development that could increase costs, and either the actual or perceived flood and groundwater risk associated with our home.

We are also concerned that an established rural equestrian property immediately beside a dense urban development may be less attractive to the buyers for whom it was designed. We do not present a quantified valuation opinion. We note, however, that the applicant's price evidence comes from Chris Jones, an agent based in Selwyn rather than Waimakariri, and the supplementary evidence reportedly acknowledged that no data were available for demand for this specific housing type. Those estimates were also prepared in a substantially different market context than what exists today. In any event, they do not answer the separate question of how the proposal may affect the value, saleability and buyer appeal of existing rural equestrian properties such as ours.

What we do know is that had the current Fast-track proposal been known when we purchased, we would not have bought this property. That is direct evidence of how the proposal changes the property's value to us and may affect the decisions of future equestrian purchasers.

8. Infrastructure responsibility and long-term ratepayer exposure

Summary: The developer should not fund only initial construction and then transfer inspection, maintenance, renewal and failure costs to existing ratepayers.

Roads, drains, culverts, detention systems, pumps, wastewater assets, paths, landscaping and traffic-control measures create obligations long after sections are sold. We believe the Panel should require a transparent, at least 30-year lifecycle plan, supplemented by whole-of-life asset obligations where asset lives extend beyond that period, setting out the responsible owner, inspection standards, maintenance frequency, costs, renewal dates, replacement costs and funding source for every development-related asset.

Where an asset exists principally because of the development, the development should fund its full attributable lifecycle cost. Enforceable mechanisms may include developer obligations, maintenance bonds, sinking funds, targeted rates or other secured arrangements. Existing residents like us should not inherit unfunded liabilities arising from optimistic design assumptions, accelerated wear, extreme weather, construction damage or premature renewal.

This matters particularly for Whites Road. The existing road and drainage corridor were created for a rural environment. If the development requires strengthening, stabilisation, larger drainage assets, intersection changes or more frequent maintenance, those costs should be identified before approval and not socialised to us later.

This concern assumes even greater importance in the context of climate change. The Climate Change Commission identifies resilient water infrastructure as fundamental to managing future flood risk and refers to stormwater capacity, safe pathways for water, detention facilities, upgraded culverts and pump stations as measures capable of reducing flood impacts. It also identifies funding and financing as important components of New Zealand's ability to adapt to increasing climate risk.

Accordingly, assessing whether infrastructure can simply be constructed at the outset is insufficient. Its ability to operate, be maintained, renewed and upgraded under increasingly demanding future conditions should be demonstrated over its whole life. This reinforces our request for a transparent 30-year lifecycle assessment and funding plan, so that the costs of climate resilience required by this development are not subsequently transferred to us existing ratepayers.

9. Why the claimed benefits do not offset the effects on us

Summary: The claimed regional benefits do not remove the direct and enduring adverse effects on our home, family, animals, travel, business and financial security.

We understand that construction creates spending and employment. However, those benefits are not the same as a benefit created specifically by locating this development at Ōhoka. Housing and construction activity could occur elsewhere in planned growth areas in Waimakariri District with existing services, better transport access and potentially lower infrastructure and environmental risk. The applicant's own headline measures of output, value added, jobs and job-years appear to describe overlapping aspects of the same activity and should not be treated as additive.

For us, the adverse effects are not theoretical economic categories. They are the risk of water in our buildings and paddocks; concern about our drinking water; difficulty moving horses and trailers safely; longer and costlier travel to work and school; noise and light at our home; stress to animals; uncertainty about insurance; and the loss of the rural equestrian environment for which we paid.

Long-term infrastructure, congestion, crashes, maintenance, climate adaptation and ratepayer costs should be assessed on a whole-of-life basis. Private gains realised through subdivision should not be weighed as if they were public benefits while future costs and liabilities are transferred to neighbours and ratepayers.

The 2026 National Climate Change Risk Assessment reinforces a central concern running through our submission: decisions made today can lock communities and infrastructure into risk for many decades. The Commission identifies both water infrastructure and buildings among New Zealand's most significant climate risks and identifies low-lying and flood-prone areas as particularly exposed. In our view, facilitating a major new urban development in an area with documented flooding, shallow groundwater and existing drainage constraints demands a precautionary approach. The relevant question is not simply whether the applicant's models predict that the development can operate today, but whether existing residents and future generations such as our children will remain protected as climate hazards intensify.

We also ask the Panel to weigh the cost of the large amount of emotional stress and worry that this twice refused subdivision, being put into the fast-track system, has caused the long-term residents here, including older residents whose homes may be their principal asset and who are concerned about the impact this subdivision will have on their home.

The Fast-track application documents do not go anywhere near explaining the emotional burden this drawn-out process has caused the local residents in Ōhoka. Written material cannot fully convey the negative emotional and financial impact this subdivision has caused the residents. The hours residents have put in to have their voices heard has been substantial. We are not employed to gain financially by our submissions, unlike the applicants, but have had to devote significant time and personal resources to exercising our democratic right to stand up to something the majority of local village residents adjoining the subdivision are against.

Lawyers acting on behalf of the applicant have even challenged the signs erected by local Ōhoka residents to express their opposition to the proposal and exercise their democratic right to have their views heard (Figure 11). This is deeply concerning. It also highlights what we consider to be a broader lack of respect for the views of the local community and disregard for local sentiment and the character and history of Ōhoka. Particularly when the applicant is now pursuing a Fast-track pathway following the rejection of substantially similar development proposals through two previous planning processes.

10. Relief sought

We ask the Panel to decline the application. The proposal would significantly and permanently affect our home, enjoyment, mental and physical wellbeing, safety, lifestyle, business operations and financial security. In our view, those effects are out of proportion to any estimated net regional or national benefit demonstrated for locating this scale of development at Ōhoka.

If the Panel is not minded to decline the application, we ask that no approval be granted until the matters affecting neighbouring properties such as ours are resolved through independent assessment and enforceable conditions, including property-specific flood and groundwater protection, construction controls, transport safety access and upgrades, drinking-water monitoring, insurance and compensation mechanisms, and fully funded 30-year infrastructure maintenance and renewal obligations.

11. Supporting sources and documents

- Waimakariri District Council Land Information Memorandum LM2502512 for [REDACTED], issued 7 January 2026.
- Ōhoka Residents' Association, General Information and Context; Background Information; Sample Submission; and Summary of Appendices, September 2026. Available on request.
- Substantive application documents for the Ōhoka Residential Subdivision project, available from <https://www.fasttrack.govt.nz/projects/Ōhoka-residential-subdivision/substantive-application>
- Climate Change Commission (2026). 2026 National Climate Change Risk Assessment for Aotearoa New Zealand, published 7 May 2026, updated 1 September 2026.
- Landcare Research S-Map Online. Available at: [S-map Online » New Zealand Soils Portal - Manaaki Whenua - Landcare Research](#).
- Unintended Consequences: Groundwater, Climate Change, Urban Development and Improving Infrastructure (2024). Helen Rutter, Kolt Johnson and Simon Cox. Water New Zealand. Available at: https://www.waternz.org.nz/Article?Action=View&Article_id=2767

12. Appendix

A. Photographs taken 29 September 2026 and October 2026 showing the condition of the Whites Road roadside drain and private drainage and water-filtration investments at [REDACTED]

The photographs below show existing slumping, erosion, exposed soil, instability and narrow verges along the roadside drainage corridor. They are included to demonstrate the present condition of infrastructure on which our property relies for drainage.



Figure 1. Whites Road drain condition, 29 September 2026, showing unstable, crumbling, sloping edges from narrow verge.



Figure 2. Whites Road drain condition, 29 September 2026, showing narrow rural road with sloping verge to open drain, slumping and low lying land to proposed development site.



Figure 3. Whites Road drain condition, 29 September 2026, showing unstable edges

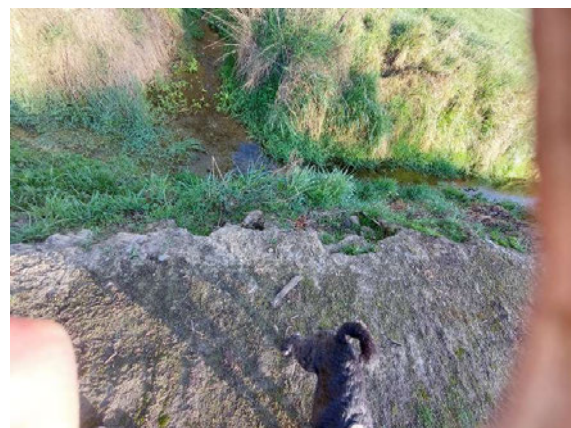


Figure 4. Whites Road drain condition, 29 September 2026 showing drainage from adjacent paddocks eroding drain edges.



Figure 5. Whites Road drain condition, 29 September 2026 showing major slumping.



Figure 6. Whites Road drain condition, 29 September 2026, showing narrow verge and slumping



Figure 7. Whites Road drain condition, 29 September 2026.



Figure 8. Sump and pumping station installed to manage surface-water runoff at [redacted] after 2022 flooding that entered sleepout and workshop.



Figure 9: [REDACTED] drainage upgrades after 2022 Flood.



Figure 10: [REDACTED] filtration system installation required following water test results September 2026.



Figure 11: Ōhoka residents' displayed signs to help their voices be heard. A substantive legal challenge was made by the applicant to have the signs removed causing stress and anxiety for local residents.

B. Ōhoka School Infrastructure and Traffic Impact Assessment



Ōhoka School
261 Jacksons Road
Ōhoka

Ōhoka School Infrastructure and Traffic Impact Assessment

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

Material Reviewed:

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

1. Executive Summary and Baseline Infrastructure Failure

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

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

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

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

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

2. Current Traffic and Parking Exhaustion

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

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

3. Active Transport and Student Safety Risks

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

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

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

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

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

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

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

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

5. Requested Relief and Proposed Mandatory Conditions

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

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

Condition 1: School-Hour Construction Traffic Curfews

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

Condition 2: Front-Funded Active Transport Infrastructure

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

Condition 3: Safe Drop-Off and Parking Mitigation

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

hazards.

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

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

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

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

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

On behalf of the Ōhoka School Board



Dr Daniel Myall
Presiding Member
Ōhoka School Board



Submission details

Email: substantive@fasttrack.govt.nz

Subject: Ōhoka Residential Subdivision

Submission deadline stated in the ORA material: 12 October 2026.