

Submission on the Ōhoka Residential Subdivision Application

Reference: Fast-track Approvals Act 2024

To: The Expert Panel

Re: Ōhoka Residential Subdivision Application by Carter Group Limited

We welcome the opportunity to provide comments on the application for the proposed Ōhoka Residential Subdivision.

We respectfully oppose the application and submit that the proposal should be declined.

1. Preliminary Matter: Whether the Proposal Advances the Purpose of the Fast-track Approvals Act 2024

Before considering the planning merits of the proposal, we submit that the Panel should carefully examine whether this development genuinely advances the purpose and intent of the Fast-track Approvals Act 2024.

While the proposal would undoubtedly provide additional housing, the provision of housing alone should not automatically be equated with regional or national significance. The key issue is not whether additional housing is required, but whether that housing is being delivered in a location that supports the long-term strategic, transport and infrastructure objectives adopted for the Greater Christchurch region.

The proposed development is fundamentally a private residential subdivision located on rural land in Ōhoka. While the development may provide local economic benefits and additional housing supply, such benefits are characteristic of many residential subdivisions throughout New Zealand and are not, in themselves, evidence that a project is of national or regional importance.

In our view, the application has not demonstrated why this particular proposal should be regarded as nationally or regionally important when compared with other housing developments that proceed through ordinary planning processes.

The Panel should also consider whether the proposal contributes to the long-term strategic outcomes sought by central government, local government and the Greater Christchurch partnership. The Greater Christchurch Spatial Plan establishes a clear and evidence-based framework for managing population growth through a more compact urban form, focused around existing urban centres, major employment areas and public transport corridors. Approving substantial greenfield growth in a location that sits outside that framework risks undermining those strategic objectives.

Approval of this proposal would signal that developments inconsistent with an adopted Future Development Strategy may nevertheless proceed through the fast-track process. That outcome would risk weakening the value of long-term strategic planning and reducing certainty for communities, infrastructure providers and local authorities.

We submit that a development which is inconsistent with the region's adopted growth strategy, increases dependence on private vehicle travel, and requires the outward expansion of infrastructure into a rural area should not automatically be assumed to deliver the sort of regional or national benefits contemplated by the legislation.

In considering the balance of benefits and adverse effects, we respectfully submit that the Panel should critically assess whether the proposal delivers outcomes of sufficient significance to justify the use of the fast-track process, particularly where previous planning processes have already concluded that large-scale urban expansion at Ōhoka is not the preferred growth outcome for the district.

2. Inconsistency with the Greater Christchurch Spatial Plan

Our principal concern is that the proposal is inconsistent with the strategic direction established through the Greater Christchurch Spatial Plan, which was endorsed by the Greater Christchurch Partnership and adopted as the Future Development Strategy by the partner councils in 2024. The Spatial Plan provides the region's agreed blueprint for accommodating future population growth and identifies a preferred urban form based on targeted intensification around centres and along major public transport corridors.

The Spatial Plan explicitly promotes:

- growth in and around existing urban centres;
- development along public transport corridors;
- more compact urban form;
- integration between land use and transport planning; and
- reduced reliance on private vehicle travel.

The proposed development at Ōhoka does not align with that strategic direction. Rather than concentrating growth in locations capable of supporting high-quality public transport and future mass rapid transit, the proposal would establish a substantial new residential expansion in a predominantly rural location that remains heavily dependent on private vehicles on an already busy road network.

Importantly, the Greater Christchurch Spatial Plan was adopted as the Future Development Strategy for Greater Christchurch in 2024, providing the agreed framework for how future housing and population growth should be accommodated across the region.

3. Failure to Support Future Mass Rapid Transit Objectives

The Spatial Plan and associated transport planning work identify Mass Rapid Transit (MRT) as a critical component of Greater Christchurch's future urban form. MRT is intended to support

housing growth and employment development in locations that can be efficiently served by high-capacity public transport. A key objective is to direct a significant proportion of future population growth along these transport corridors.

Locating approximately 850-879 additional dwellings in Ōhoka would disperse growth away from these planned corridors. The proposal therefore risks undermining the integrated land-use and transport outcomes sought by regional planning authorities.

While the application may propose various transport improvements, local road upgrades are not equivalent to locating growth where it can be effectively supported by future mass rapid transit infrastructure. In our view, the proposal represents a continuation of low-density, peripheral growth that increases long-term reliance on private vehicles and is inconsistent with the region's agreed transport direction.

4. Previous Planning Processes Have Already Tested This Location

A matter of particular concern is that the suitability of large-scale residential development in Ōhoka has already been extensively considered through previous statutory planning processes.

The location has already been subject to extensive assessment through the Private Plan Change and Proposed District Plan processes, both of which concluded that large-scale residential expansion at Ōhoka was not the preferred planning outcome.

While the Fast-track Approvals Act provides an alternative pathway, we submit that the Panel should give significant weight to the conclusions reached through those earlier planning processes. Those processes involved extensive evidence, expert analysis, and community participation.

5. Infrastructure Efficiency and Long-Term Public Cost

The Spatial Plan was developed in part to ensure that future growth occurs in locations where infrastructure can be efficiently delivered and maintained. Concentrating growth around existing urban centres and transport corridors allows public investment in transport, water, wastewater, community facilities and social infrastructure to achieve the greatest benefit.

Development in locations that sit outside the preferred growth pattern can create additional long-term costs and place pressure on infrastructure networks that were not originally planned to accommodate significant urban expansion.

We are concerned that approving a large greenfield subdivision in Ōhoka may result in infrastructure outcomes that are less efficient than directing equivalent growth toward locations already identified through regional planning processes for urban expansion and intensification.

6. Public Confidence in Strategic Planning

The Greater Christchurch Spatial Plan was developed through extensive technical analysis, inter-agency collaboration and public engagement. More than 7,000 people participated in

consultation, with strong support expressed for focusing future growth around centres and public transport routes.

If developments that are inconsistent with that agreed growth strategy are approved through the fast-track process, there is a risk that public confidence in long-term strategic planning will be undermined.

Communities should be able to rely on adopted regional growth strategies as meaningful guides to future development rather than seeing them overridden by ad hoc exceptions.

7. Conclusion

The application has not demonstrated that this proposal is of sufficient regional or national significance to justify departure from the ordinary planning framework. If every large residential subdivision were considered to be of regional or national importance solely because it increased housing supply, the distinction between the fast-track process and ordinary planning processes would be substantially diminished.

For the reasons above, we respectfully submit that:

1. The application has not demonstrated that this proposal is of sufficient regional or national significance to justify use of the fast-track process.
2. The proposal is inconsistent with the strategic direction of the Greater Christchurch Spatial Plan.
3. The proposal does not support the concentration of future growth along public transport and mass rapid transit corridors.
4. Previous planning processes have already determined that large-scale urban expansion in Ōhoka **is not** the most appropriate growth outcome.
5. The proposal risks undermining infrastructure efficiency and integrated transport planning.
6. Approval would weaken confidence in the regional planning framework established for Greater Christchurch.

Accordingly, we respectfully request that the Expert Panel decline the application.

Yours faithfully,

Robert and Lisa Hall

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