

## 1. Introduction

Good morning, my name is AJ Low. With my husband Richard and two children Emmerson and Soren we have lived in Ōhoka for 10 years, we live in the historic Vicarage adjacent to the St Albans church, directly opposite the proposed plan change site. My husband and I are not anti-development in fact both of us earn our living from the construction industry. We own and operate a Flooring Retail business, I am a Quantity surveyor and work part time for a Christchurch residential development company. I have a degree in Mathematics and Environmental Politics in Developing Nations and a Bachelor of Construction in Quantity Surveying. Richard, Emmerson, Soren and myself are part of the 619 submissions that do not support PC31 and implore that you reject this proposal. We believe PC31 does not constitute good resource management.

To give our opposition a bit of context, I'm going to take a few minutes to paint a picture of our Ōhoka for you:

## 2. Ōhoka Then

Ōhoka translates to mean "Place of Hoka, a stake to which a decoy parrot was tied (Reed "The concise Māori Handbook"). Ōhoka was part of the wide and rich mahinga kai catchment area for the inhabitants of the Kaiapoi pa.

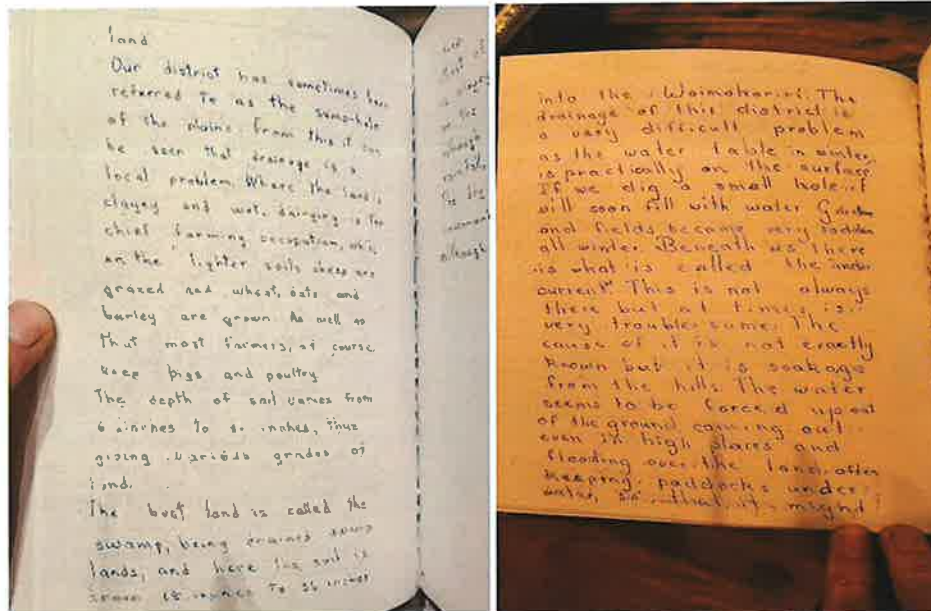


From the 1850's European settlers did what settlers do best- clear the land of trees and seek to master its waterways by draining vast wetland areas such as the Rangiora and Ōhoka swamps to convert to farmland. Wheat was the major crop, along with oats and barley and the Ōhoka stream provided power for mills to process it into flour as well as flax processing. A train line was built in 1870 ran through Ōhoka along Mill Road all the way out to the Waimakariri Gorge.

Photos from left to right: 1. Painting Ohoka Bush 1854 James Preston, Slab and Canvas Hut, 2. a picture of Edwin Lord (far right) and fellow farmers using a machine in Ohoka, date unknown, 3. Mill Road, date unknown, 4. Ohoka train siding, Mill and Bradleys Rd Circa 1941, 5. Survey of Ohoka School District by std2 to form 2 1943. 6. [Harold Stone of Ohoka – a life of giving – Tim Fulton \(timfultonmedia.co.nz\)](http://timfultonmedia.co.nz)



A Survey of the Ōhoka School District by the standard 2 to form 2 students written in 1943 give the following description:



The aerial photo shows Mill Rd and Bradleys Road circa 1941 – the site now being proposed for urbanisation. Another recollection of early life in Ohoka from Harold Stone



Memories of Ohoka Rugby Club life member, the late Harold Stone

An interview in 2008

*Harold Stone grew up in swamp country, on a farm near Ohoka that would normally flood every two or three years. It's pretty low lying around here. On our farm at Wilson's Siding the springs would come and go every day with the tide. In the early days along the Mill Stream there was four flour mills, a flax mill and a wool scour – all out of the one little stream. But with the underground water in those days there were springs everywhere and those mills just kept going...all with waterwheels*

...

One night a Mr Izard came down to our place and said to my father, the flood's coming, you'd better do something. So father went out and cut a very small hole through the railway line – it washed out the railway line but it saved us. Those floods were terrible.

Today, Ohoka is still low lying, still has a high water table and still has clay soils, still has springs and streams throughout. This is the nature of the land here, the physical characteristics of the land haven't changed.

### 3. Ōhoka Now



Ōhoka circa 2021



Skip forward 168 years later, and here is an aerial view of our wee Ōhoka settlement. There we are all 35 houses, the Domain, the petrol station, one Church, Ōhoka Hall and Waterforce, together we make up the rural residential settlement or Res3a zone.

Contrary to what was written in the Section 32 report I can confirm that in the 10 years I have lived here that there is no Baby culture handknits clothing store, Dollar save club \$2 shop, a dentist and Oakhampton BnB, these businesses no longer exist or never existed in Ōhoka in the first place. I can only presume that they did a cursory google search of the area for their research.

I can confirm however that along Mill road there is a lithographers, a financial advisor and Glen Walls who sells organic kindling and Christmas lillies from his road side stall. Further away on Bradleys road there is a Canterbury Pet Foods factory, a chicken hatchery and a Beagle boarding Kennel. At different times of the year road side stands pop up in Ōhoka and you can find peonies and daffodils for sale, you can buy organic Kombucha, mushrooms, bags of pony poo, lemons, feijoas, tomatoes, cucumbers, courgettes, pears, apples- everyone's surplus home grown produce, fresh, organic and affordable. These are the activities of a semi rural community, not an urban township and they do not show up on a google search. Only a perverse interpretation of our settlement would consider it urban residential and then have the arrogance to demand that a satellite town be plonked in the middle of it.

Ōhoka is unique in that it is one of the last remaining settlements that offers authentic lifestyle living.

Ōhoka is described as "a popular country location" (Harcourts)

"Idyllic lifestyle and country retreats" (Harcourts)

"A relaxed and peaceful village" (Waimakariri.co.nz)

"Ōhoka, one of Canterbury's finest lifestyle communities" (Bayleys Real estate)

Why would you change the nature of something that works? For the people who live here as well as those to come to visit? Why destroy the very thing that makes this area unique and attracts people here in the first place? Ōhoka does not need to be another homogeneous satellite town.

#### 4. And my/our Ōhoka

This is our home, it was build in 1879 as the vicarage for the St Albans church next door. In 1909 it was converted to Te Waipounamu Māori Girls College picture below is on its opening day in 1909- it was the only boarding school for Māori girls in the South island- a number of the student came from the Chatham Islands. It is category 2 listed with Heritage NZ.







The school moved into Ferry Road into Ferry Road in 1921 and has been a private residence since. This year we have undertaken major renovations releveling and re-piling the foundations and putting the chimneys back up- its our gift back to the house so that it will last for another 144 years.

We love the lack of shops, lacks of curb, channelling and concrete paths, we love the rural outlook, the hedges, the low noise, low traffic, minimal street lighting, the sound of korimako and in summer owls, the waist high mist that forms over the paddocks and road in winter. Love being able to see the snow on the southern alps. We have lived in Auckland, wellington and London but moved to Ōhoka to get out of the rat race, to have space and privacy and large trees around us, to grow things, to see the stars, for our children to go to a small school, to play in the stream and be kids for as long as possible. These are our amenity values.

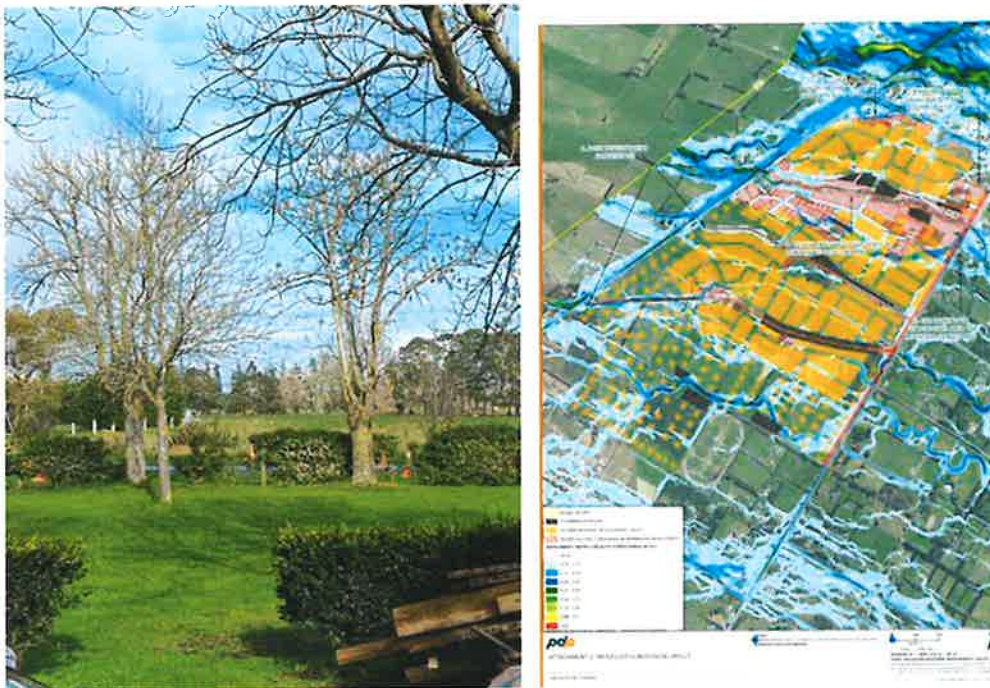
Mr Falconer in his Urban design evidence believes that living in a village is a romantic notion of a pre industrial society close to nature and ones neighbours (Para69). He doesn't state what constitutes a village, but he is adamant that it has nothing to do with population size. To be fair I guess there could be many 2500+ people in remote African Villages somewhere, but in NZ it is generally accepted that rural settlements have a population of 200-999 people or at least 40 dwellings- this serves to distinguish between true rural dwellers and those in rural settlements (Statistics NZ).

In para 68 Mr Falconer says that Ōhoka village lacks good paths, lacks density, mix of uses and is dominated by vehicles. Once again he doesn't say what constitutes a village but says instead what a village is not – open space, vehicle domination, lack of human interest, poor paths and lack of profuse planting (para67) it would appear that Mr Falconer is not charmed by our beautiful Ōhoka, "one of Canterbury's finest lifestyle communities" but that is perfectly fine as the saying goes 'horses for courses'. As a resident, I do not consider these fundamental flaws of Ōhoka, these are the things that make Ōhoka unique and endearing- part of the attraction of not living in a sanitised, highly controlled, homogeneous urban environment.

He refers to NPS-UD objective 4 regarding amenity values changing over time but has conveniently omitted the clear directions of Policy 6 (b) (ii) as long as they "are not, of themselves an adverse effect" (Para67)



## 5. Visual amenity



As mentioned earlier, we live directly across the road from the proposed plan change site. This is the view out of my kitchen, entry, stair landing and children's bedroom windows. If the plan change goes ahead this will be replaced with a car park, an intersection and shops.

In Mr Compton -Moen's landscape evidence he admits that "Overall, the receiving environment has a rural semi-open character on the southern edge of an existing rural settlement" (Para 24). We are in agreement with that. However I take exception to his next comment that:

"...the highest likely effects on visual amenity, after mitigation, will be experienced by those residential properties closest to the proposal, along whites and Bradleys road as well as those sites that which directly adjoin the proposal" though there is a change from rural to residential, I consider the magnitude of change to be low..." (para 40)

It is insulting that Mr Compton- Moen has not seriously considered the impact on the small cluster of houses along Mill road that face into the farm. Instead of green grass, hedge and trees I will be looking directly in to the carpark, shops, and intersection and a sea of 850+ coloursteel rooves- most like ironsand colour. This is a substantial and significant difference on our visual amenity not just when we leave the driveway but through half the windows in my house!

But perhaps I will still be able to see the established towering trees in the distance? Well doesn't seem so as Although para 45 states that where possible existing trees will be maintained, Out of the 2033 trees Tree Tech have counted only around 370 trees will be retained (para 46), removing 81.8% of the trees on site- I see that Paul Farrelly has not included this in his GHG analysis.

The applicant says that this is all in keeping with a rural village. The Operative District Plan especially 18.1.1.9 confirms that it does not, so instead of making a development that suits the land and community, such as rural lifestyle they are wanting to have the Operative District Plan rewritten. And although it is not within your scope, Carters unbeknown to the us also applied in November 2021 for



the Proposed District Plan to be rewritten to support PC31, and now with the added twist of requesting the original settlement zone becomes a Gen Res Zone. And again under Variation 1 applying for the plan change area to be reclassified as a relevant residential zone.

What makes this process more difficult for the everyday people, like us, is the fluidity of the development plan, whole plan change application seems to be a moving feast- housing numbers increasing, decreasing, high schools one moment primary school the next, yet no school likely at all according to MoE. Multi story retirement block- hasn't been mentioned recently, but a new International Polo ground has popped up, concrete channels and containment areas, 300mm in the ground now gone instead water basins are retaining stormwater above the ground, and shifting the market to a carpark so someone from the actual community appears to support the proposal.

So that is my potted history of Ohoka and part of why my family feel so strongly about keeping Ohoka rural residential.

#### 6. If Declined

If PC31 were to be declined Carters claim that they will default back to developing the (profitable and productive Dairy farm) land into 4ha blocks, without the carpark, polo ground and shops. This option would not demonstrably change the nature of Ohoka, would not require the district Plan to be rewritten, could generally tap into existing infrastructure, result in no reverse sensitivity issues, would enhance the existing school rather than require an additional one. Carter Group make their money, the Sheriffs (farmers of land) make money and while local residents would be disappointed seeing a long standing farm be subdivided, we can get our lives back after spending 18 months of stress and anxiety trying to prevent a development that makes absolutely no sense other than to the Carter Group who stand to benefit from it.

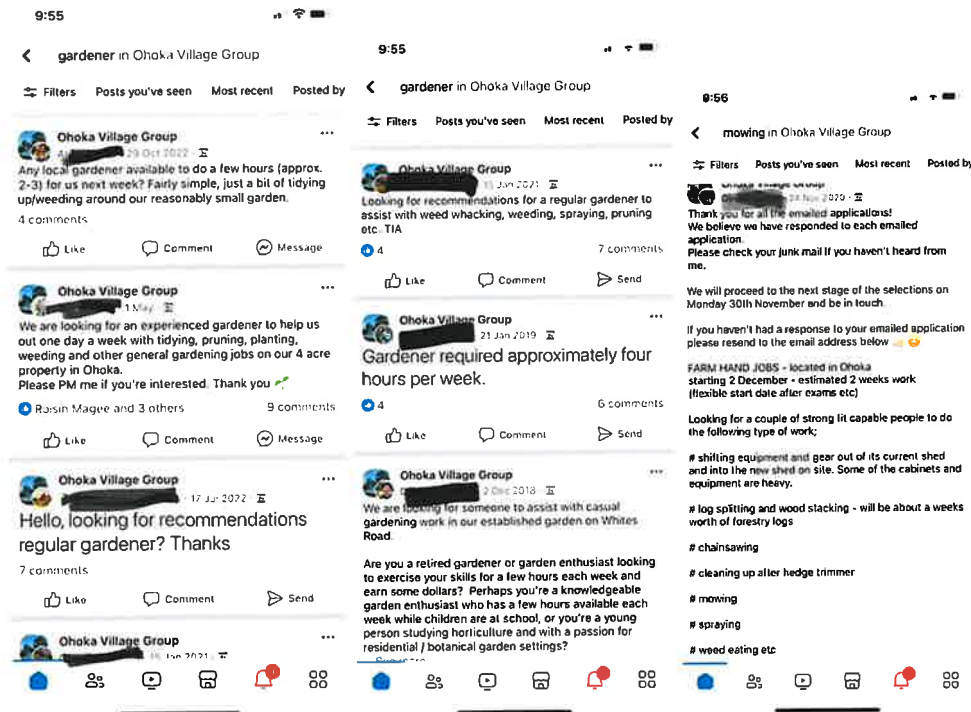
#### 7. Rural Lifestyle Zone

Lifestyle blocks are a valid and desirable form of housing variation and one of the features of living in the Waimakariri district. The rural lifestyle zone must not be seen as an area in transition to urban activities, as they preserve and often enhance the spacious semi-rural character of our district.

While lifestyle blocks are not big money makers for Councils in terms of rates, they instead contribute significantly to the wider Waimakariri economy. They are not called 'life sentence blocks' for no reason.

Ride on mowers, tractors, hedge trimmers, chainsaws, fencing, quad bikes, vet bills, gardeners, tree toppers, log splitters, shelter belt maintenance, arborists, home kill services, septic tank servicing, fire wood, the list goes on. I would hazard a guess that the economic benefits to the economy from life-stylers far exceed the money urban dwellers spend on food and beverage conveniences in a nearby shop. Here are some employment requests for gardening help alone:





Lifestyle blocks unlike urban residential houses allow residents to own horses onsite and Ōhoka is a very popular horse area- (this may be the only thing I agree with the applicant on). A Waikato University Study in 2012 showed that there are over 80,000 sport horses in NZ (all horses that are not being used for the purposes of racing or breeding) sport horses contribute over \$1 billion to the NZ economy annually ([Economic Impact Report on the New Zealand Sport Horse Industry 2012.pdf \(waikato.ac.nz\)](#)). An outdated but indicative the level of financial contribution to the economy.

In my perspective, the risk of not acting on this plan change, is very low- the alternative scenario creates much less externalities for the Waimakariri district as a whole and creates alternative positive benefits.

## 8. Expert Evidence in General

Whilst the professionals Carters/RIDL have engaged to provide opinions are all highly experienced and qualified in their chosen fields, it is difficult to overlook the fact that they have been paid to construct arguments for the specific purpose of supporting the plan change. There seems to be no consideration for the best outcome for the district. As opposed to the Waimakariri Council, who have engaged consultants to identify the best areas for development in the district without any ulterior motive.

I have picked out a few features of the witness statements to demonstrate my point:

### Drainage

Would like to draw the Commissioners attention to this situation occurring in a Blenheim subdivision Rose Manor, where the residents are demanding their Council fence the swales as they are a drowning hazard for children in the area when full ([Council won't fence stormwater ponds, reminds residents of 'parental responsibility' | Stuff.co.nz](#)). Their ponds were not supposed to hold water for long and may have





been partially blocked due to soil run off, in the meantime local kids have been biking though and even seen snorkelling in the contained water.

Given the delayed release of any stormwater into our streams and road side drains to ensure that present maximum flows are never exceeded, one would presume that water will be present for a long periods of time on the plan change site. Under the building Act , any pool capable of holding 400mm of water had to be fenced., including temporary inflatable pools.

"The developer of the Blenheim subdivision says a "squawking minority" has cost ratepayers thousands by prompting the council to make the water in the ponds drain away faster. DeLuxe Property Group developer Greg Smith said he believed the call for fencing was a "storm in a teacup". ([Developer says stormwater pond complaints from a 'squawking minority' | Stuff.co.nz](#))



7 of 9 ent 1 Proposed Detention Basin Designs



Figure 1 Upgradient View of Detention Basin



Figure 2 Downgradient View of Detention Basin

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Wairarapa Regional Council

### GHG emission – Paul Farrelly Evidence

Again, another example of lived experience and observations being more accurate than modelling.

Mr Farrelly states that the removal of the dairy farm would save a total of 1257t/CO<sub>2</sub>e per year. I estimate (after a quick call of locals asking how many km people drive each year) that the average car out this way travels 25,000-30,000km per year. Multiplied by 105g/co<sub>2</sub>e/km (clean car import standard by 2025 for cars and SUV's from beehive.govt). Average 2 cars per household, deduct by 3% (EV fleet adjustment by 2025), deduct by number of people I know that bike to every day to work 0.

Estimated emissions for one car in Ohoka 27500km/y x 0.105kg/km = 2,887.5kg/co<sub>2</sub>e per year

For 850 new dwellings, average 2 cars per household, deduct by 3% for NZ EV fleet



$2,887.5\text{kg} \times 850 \times 2 \times 0.97 = 4,761,487.5\text{kg/year}$

$=4761.5\text{T}/\text{CO}_2\text{-e/year}$  additional emissions from PC31

By removing the dairy farm on the proposed development site, approximately 1257T/co2-e/year will no longer enter the atmosphere (or will enter via a different farm in a different location- I believe that the Dairy farm owners on the proposed development site are looking to purchase a farm elsewhere for their daughter)

Instead by adding a minimum 850 housing in a rural area with no public transport will instead emit 4761.5T/CO2-e/year.

At the very basic level the PC31 development can not possibly be supporting a reduction in GHG emissions (as per NPS-UD policy1 (e)).

The Applicants GHG Statement of Evidence paragraph 138 states that purchasers will want to buy in Ōhoka because of its relative closeness to Christchurch, if they are unable to then they will have to look in locations further away and that would create more carbon emissions. Being that the distance from Christchurch City to Ōhoka is 25km this is a comparable travel distance to Christchurch City as Woodend (=), Ravenswood (+2km) and Rangiora (+3km) and Kaiapoi (-5km). Seeing as there urban hubs that already have public transport facilities, it would make much more sense to develop there rather in a greenfield site off the beaten track.

#### Urban Design Evidence- Garth Falconer

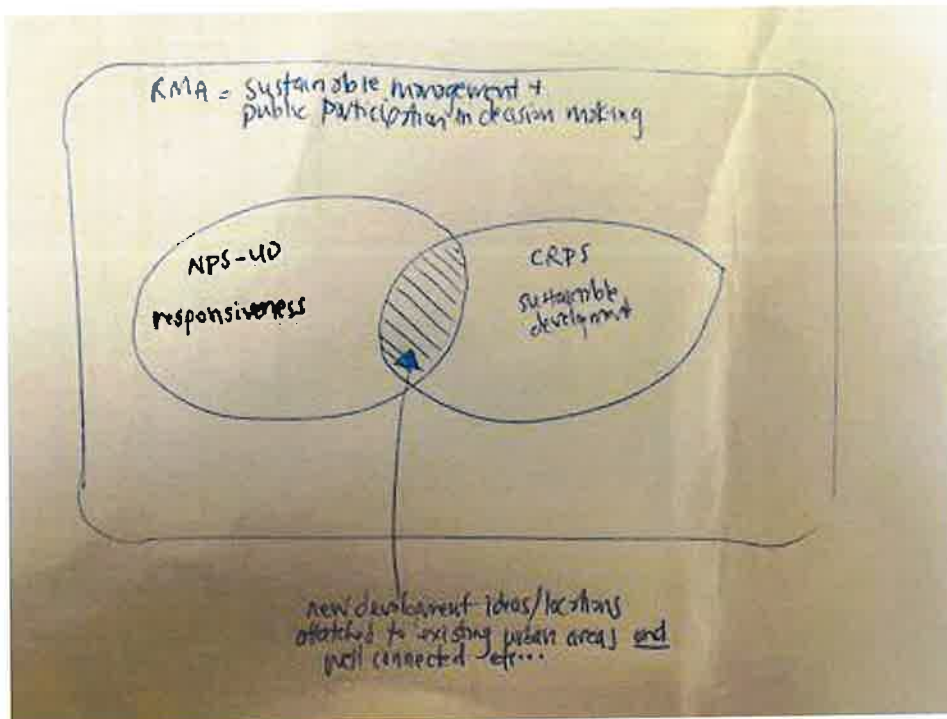
#### Ecology- Mark Taylor Evidence

It would have been good if Mr Taylor was able to consider the impact of urban housing on the tuna, the long finned eel, taonga to NZ, as well as the short finned eel which are also present in the pond at the southern end of Whites Road and Tram Road. In the last 5 years these ponds have completely dried up 3 times, leaving the base of the pond exposed. Before this happens most (not all) of the eels travel overland, through the plan change site and make their way to the Ohoka streams to continue their lives. What happens when there are now 850+ houses in the way, controlled drainage swales to jump into instead of natural streams? It is understandable that Mr Taylor would not have known about this as it is through experience of the area that it would come to your attention.

#### No Hierarchy between NPS-UD and CPRS

Tim Walsh (paragraph 240) reiterating the contention between NPS-UD and CRPS. Requiring legal clarification, applicants only make it confusing when you need it to be- can be pretty simple. Here is my lay-persons perspective of how the two should work.





### Conclusion

We need to do better! Greenfield development off the beaten track is just lazy land speculation. Christchurch, Waimakariri and Selwyn District are a team that makes up Greater Christchurch. They have a vision and a plan for making our region sustainable and resilient for our future generations. By 2028 the aim is to have 71% of Greater Christchurch's housing growth supported in Christchurch City, with the remaining 16% in Selwyn and 13% in Waimakariri. It is time developers started contributing to this goal instead of constantly subverting it via private plan changes.

PC31 not only messes up the WDC years of strategic planning but is also doing a disservice to the whole Canterbury Region. We are knee deep in the effects of Climate Change at the moment so it's time that the people with the decision-making powers start making those tough decisions.

Ōhoka is NOT an urban environment, it is not located within a FUDA or a greenfield priority area and it follows that the NPS-UD does not apply. In the unlikely case that as an unintended consequence Ōhoka was considered an urban environment, then the plan change still fails to meet the low bar set by the NPS-UD. As the NPS-UD does not allow private developers to rezone rural land to create sprawling satellite towns underpinning years of planning and work by local and regional councils. PC31 would place undue pressure on the tax payers of the Waimakariri district to subsidise the extraordinary requirements of constructing infrastructure to the site and maintaining it into the future.

