# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Jason **Last name:** Dutkiewicz

**Prefered method of contact**

**Postal address:** 175 turners rd, Ouruhia, Christchurch, New Zealand, 8073

**Email:** jason_dutkiewicz@hotmail.com

**Daytime Phone:** 0273526815

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
A complete rejection of the proposed subdivision we don't need another subdivision with houses packed in like sardines that all the look the same with no character

**Reason for Decision Requested:**

## Specific Provisions

all of the whisper creek subdivision and rezoning to rural fringe

## Reasons

Our property will be right up against the back of the proposed subdivision this will likely cause a increase of traffic and noise, we previously purchased the property for the close proximity to town with the mix of country lifestyle and safe environment to raise my children, building a subdivision across the road will destroy everything good about the area.

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# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Stephanie **Last name:** Blackler

**Prefered method of contact**

**Postal address:** 140 Turners Rd, Ouruhia, Christchurch, New Zealand, 8983

**Email:** blacklers@outlook.com

**Daytime Phone:** 0210620567

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
The decision I would like the council to make is to oppose this zone change. All the houses in the street are lifestyle blocks and I would like it to stay that way. This is an unique and special area where we can live on a lifestyle block and still be able to bike to the city. If there is any plan change made I would like to see the original roading concept of using lower styx rd with a roundabout as the main entrance to any subdivision approved. The lights at Marshland rd are already set up for this.

**Reason for Decision Requested:**

## Specific Provisions

Increase in traffic on our narrow country road with no footpaths and no room for bike riding. There is also horse riding along verge which would be adversely affected by increased traffic. Most of the residents in the street use it for their daily run, walk or dog walk as at present it is a relatively quiet road. Bore water. The street relies on bore water for its houses livestock and gardens. Having an 800 section subdivision could adversely affect the supply and contamination could occur from storm water run off. Noise, dust, and heavy traffic while subdivision is being developed.

## Reasons

We live very close to the proposed change in zoning. We would be adversely impacted by this plan change. When we bought in the street 13 years ago we knew about golf resort development but felt we wouldn't be adversely affected as residential area was small and the traffic/ roading proposal was across private bridge then round about on lower styx road down to lights on marshland rd. Now it looks like most of the traffic would be using Turners Rd. I do not want an increase in dust, noise and the danger of continual traffic on the street. This includes truck traffic. We already have issues with continual potholes. As above - the development of the subdivision would affect us with dust, noise and traffic. This could be for several years. Finally my concerns about our bore water. We have some of the best water in Christchurch and I would like that to continue without the worry of reduction in flow and contamination. We bought here for a country lifestyle close to the city and would like to continue living on our piece of quiet rural paradise.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Ian Herbert **Last name:** Blackler

**Prefered method of contact**

**Postal address:** 140 Turners Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** blacklers@outlook.com

**Daytime Phone:** 0276243623

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
If this application is granted I would ask council to make the main entry / exit from Lower Styx road which would require a bridge to be built.

**Reason for Decision Requested:**

## Specific Provisions

Changing from the existing classification of a resort/golf course to high intensity residential housing.

## Reasons

The totally inadequate roads that are in place to deal with the huge increase in volume of traffic in the building phase and later when housing is in place. Turners Road in particular is narrow with no footpath and is barely suitable now with existing traffic movements and cannot deal with the huge increase. Ouruhia school is on Turners road and currently there is no footpath to enable children to safely walk to and from and this subdivision would make this more dangerous for children than it already is. This area is subject to eastily winds for a large part of the year and we already have a huge dust problem with a number of trucks depositing soils and other products onto the area in question at times on a daily basis.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Rowena Anne **Last name:** Watson

**Prefered method of contact**

**Postal address:** 103A Turners Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** ro@beadz.co.nz

**Daytime Phone:** 021368507

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
1. I would like this application for the plan change to be turned down & the land zoning remain unchanged. 2. In the worst case that the plan is approved I would like to see the subdivision to be no more than 165 houses, as was approved for the golf course, with

greater green space & more extensive setbacks from the road & boundaries. 3.I note the cultural report was completed in 2022 & the author had no knowledge of the significance of the "pathway to the sea". This needs to be explored by Ngāi Tahu, along with an archeological report prior to the commencement of any work in this area. 4. I would like to see the bridge reinstated to Lower Styx Road into the traffic plan, so traffic does not flow onto Turners Road 5. Pathways along Turners Road will be necessary to ensure safe egress for walking 6. Low level lighting needs also to be factored into the plan

**Reason for Decision Requested:**

## Specific Provisions

1. The cultural values of the area 2.Transport/traffic assessment: increased traffic movements each day 3. Lack of rural amenity 4. Housing intensification of proposed 800 houses in Ouruhia represents an increase of 1333% based on the census for 2022

## Reasons

This will affect many things for me Cultural The decimation of the cultural values & taonga & history will be enormous, as this whole area where the subdivision is planned holds a pathway between Ngāi Tūāhuriri Pā & the sea. The site of my family farm was on Lower Styx Road which is the other side of the river from the proposed subdivision. There were & probably still are middens on our sandhills & we found adzes & other artifacts which are held in the Canterbury museum. This pathway stretched across the loop where the subdivision is planned and goes through both my family farm at 143 Lower Styx road & the former Treleaven farm across the road again. No formal archeological research has been done on this site. It is important that this be completed by senior Ngāi Tahu archeologists prior to the development & we have notified Ngāi Tahu of this matter. Transport & Traffic The subdivision will increase traffic along Turners Road from its current level of 600-800 vehicles per day to over 3,500 including heavy traffic. This will affect the foundations of my home because Turners Road is a minor road & not built for this volume & type of traffic Rural Amenity I have chosen a rural location to live quietly in, as this is important to my enjoyment of life. This is a beautiful little enclave that I love. There is a danger when walking along the rural road (because many of us walk daily with our pets) when there are no footpaths. The road is already dangerous; this will only increase with such a large group of houses & a huge number of extra cars. The golf course had agreed that all traffic would go out over a new bridge on lower Styx Road which is a much larger road. In addition, the increased number of households will increase significantly the light pollution with no planning for low level lighting, so we can still enjoy the dark sky. It is noted the golf course had low level lighting included in its application. Housing intensification There is only a 5-metre setback from the road in the application. The golf course had agreed to a 50-100 metre setback which would be much more appropriate for a rural area with a grassed/planted area at the front to blend into the green setting.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Colin **Last name:** Shaw

**Prefered method of contact**

**Postal address:** 220 Spencerville Rd, Christchurch,, Christchurch, Christchurch, New Zealand, 8083

**Email:** colin4sure@gmail.com

**Daytime Phone:** 0272758706

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Note to person making submission:**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Neutral**
**Decision Requested:**
Non commital

**Reason for Decision Requested:**

### Specific Provisions

Nonspecific

**Reasons**

I am a neighbour with a direct boundary to the proposed development

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Steven A and Kay P. **Last name:** Baker

**Prefered method of contact**

**Postal address:** 147 Spencerville Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** nitendayok@gmail.com

**Daytime Phone:** 0332370830272274189

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
We oppose all aspects of this Private Plan change.

**Reason for Decision Requested:**

## Specific Provisions

Domestic water water supply Traffic Noise - residential and construction Tele communications

## Reasons

Our domestic household water supply, which is from a well, 30 metres deep will have significant chance of running out of water due to the draw down of any new subdivision. Because of the added draw down there is also a major risk of salt water infusion. Spencerville Road and the surrounding roads are minor rural roads and not able to cope with the increase of traffic. Also, the rail crossing and intersection onto Main North Road will need significant upgrading to accommodate the increase in traffic. Increased residential and construction noise will disrupt my peaceful way of life we have enjoyed for the last 41 years. Tele communications - Cell phone coverage in this area impossible to use on holidays and weekends as there is no fibre optic service made available to this area.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Dennis and Karen **Last name:** Casey

**Prefered method of contact**

**Postal address:** 156 Turners Road, CHRISTCHURCH, CHRISTCHURCH, New Zealand, 8083

**Email:** karenpcasey@gmail.com

**Daytime Phone:** 0273033702

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Support**
**Decision Requested:**
As we intend on remaining on our property at 156 Turners Rd, we would like to be involved in the decision making determining the size of the sections, recreation and water areas. We require provision to access the water supply, sewerage, power, and stormwater and any other services available eg fibre network

**Reason for Decision Requested:**

### Specific Provisions

ALL - our submission relates to all parts of the plan change as we are part of the proposed zone change.

### Reasons

To allow growth in the area and to help grow the local primary school, Ouruhia School. As our grandchildren live in this street, Improvement of the road structure with cycle track allows it to be safer for children to bike/walk to school. The possibility of public transport, in the future is a positive for us as we age. Improvement/development of recreational areas

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Carl **Last name:** Lange

**Organisation:** True Form Building ltd

**Prefered method of contact**

**Postal address:** 21 Gefkins Rd, Rangiora, Rangiora, New Zealand, 7400

**Email:** trufrm@gmail.com

**Daytime Phone:** 021655996

**Mobile:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Support**
**Decision Requested:**

**Reason for Decision Requested:**

### Specific Provisions

I am a builder of new residential homes and apartments. Christchurch City has a desperate shortage of greenfield housing options for families who want to build a home close to the city. This is a great location for a new residential subdivision. The proposed subdivision offers good schooling options and great lifestyle options, including recreational facilities and being close to the beach and cycleways. I fully support the plan change.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Mel **Last name:** Pierce

**Prefered method of contact**

**Postal address:** 35 Heyders Rd, Christchurch, Christchurch, New Zealand, 8083

**Email:** melindajpierce@gmail.com

**Daytime Phone:** 0212324206

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
I would like the council to not to go ahead with any of the planned proposal , due to the negative impact this will have on our community as well as visitors to Spencerville that enjoy what this rural environment has to offer, as it is.

**Reason for Decision Requested:**

## Specific Provisions

The community, the Impact of Styx river, traffic increase, and changes to the roads rates would increase, Negatively impact our current housing market in this area The nature, including wildlife Taking away the rural aspect of Spencerville

## Reasons

Changing the surronding space we live in, this is rural residential.zone currently and I would like it to stay like this for our community and the nature around us. This would mean a significant increase in traffic. This would negatively impact the Styx River . This would put the Spencerville residents at immense risk of flooding , by building up the land in the proposed plans.having the Styx River flood risk towards Spencerville. Additional cost on our rates, Once the pockets of Christchurch's nature is built on it will forever be changed negatively.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Daniel **Last name:** Miller

**Prefered method of contact**

**Postal address:** 288 Lower Styx Rd, Spencerville, Christchurch, New Zealand, 8083

**Email:** millerdchch@bigpond.com

**Daytime Phone:** 0225275819

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**

**Reason for Decision Requested:**

### Specific Provisions

To rezone operative special purpose golf resort zone and urban rural fringe zone upper terrace site to residential new neighbourhood zone.

### Reasons

Increased traffic Increased flooding risk Higher rates

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Kim Melony **Last name:** Foot

**Prefered method of contact**

**Postal address:** 5 Riverside Lane, CHRISTCHURCH, CHRISTCHURCH, New Zealand, 8083

**Email:** kfoot@xtra.co.nz

**Daytime Phone:** 0276955971

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
this has always been a small settlement location, it will course all sorts of roading and traffic problems, the people that want this on there property have always disregarded the council rules, and they have built up the land already and not taken any notice of the

council rules, we will be badly flooded if this goes ahead please dont let it.

**Reason for Decision Requested:**

## Specific Provisions

Water supply and sewage

## Reasons

The water pressure in spencerville is terrible already and there is still a smell of sewage at the top of seabrooke drive it has been a problem since the earthqukes

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Anthony John **Last name:** Greaves

**Prefered method of contact**

**Postal address:** 33 Hemingway Place, Spencerville, Christchurch, New Zealand, 8083

**Email:** tony.aj.greaves@gmail.com

**Daytime Phone:** 021 551935

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Support**
**Decision Requested:**
I would like to see the Council fully approve this plan change in all its aspects.

**Reason for Decision Requested:**

### Specific Provisions

I am in full support of all aspects of this plan change.

### Reasons

In my estimation, should the proposed development take place, this will significantly enhance many aspects of the already high quality of residential life offered by the Spencerville area. Furthermore, although I am a long-term Spencerville resident, I strongly disagree with the stance being taken by the Spencerville Residents Association and much of the rationale the Association provides for this stance. I wish to make it abundantly clear that this Association does not speak for all residents of Spencerville, and in fact has taken a position on this matter with no attempt whatsoever at gaining a consensus view from Spencerville residents.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** John **Last name:** Kennedy

**Prefered method of contact**

**Postal address:** 19 Heyders Rd, Spencerville, Christchurch, New Zealand, 8083

**Email:** johnkenn100@hotmail.com

**Daytime Phone:** 0211693907

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
I oppose all aspects of the development and wish foe the land in question to remain for the purpose of farming and not for unsuitable, disruptive housing development.

**Reason for Decision Requested:**

## Specific Provisions

Flooding. I have lived in the area for 8 years and on at least 10 occasions or more seen this relevant land under consideration for rezoning, completely underwater, serving as a flood plane for the Styx river. This land is completely unsuitable for property development and it would be negligent for it to go ahead.

## Reasons

It would bring infrastructural bedlam to the area for the benefit of a handful of landowners at the expense of hundreds of families who enjoy the quiet semi rural character of the area.

---

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Spencerville Residents Association

**Last name:**

**Organisation:** Treasurer

**Prefered method of contact**

**Postal address:** 6a Heyders Road, Spencerville, Christchurch, New Zealand, 8083

**Email:** spencervilleresidentsassoc@gmail.com

**Daytime Phone:** 0211121921

**Mobile:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Note to person making submission:**

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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
To reject the application in its entirety.

**Reason for Decision Requested:**

### Specific Provisions

This submission relates to the entire proposal: This submission relates to the section 32 evaluation of the plan change and all related documents submitted by LMM and documents prepared by the Christchurch City Council (CCC) and any other relevant

documents.

### Reasons

The submitters oppose all aspects of the proposal - see attached document. We join the Ouruhia Residents Group in opposing the change of purpose for the land and its impact on the environment.

---

**Name of submitters**

**Ouruhia Residents Group – Contact George Nimmo**
**(See attached signatures)**

## Application to which submission relates

1. This is a submission on an application by LMM Investments 2012 (the applicant /the proposal)

   This submission relates to the section 32 evaluation of the plan change and all related documents submitted by LMM and documents prepared by the Christchurch City Council (CCC) and any other relevant documents.

The submitters oppose all aspects of the proposal

## Relevant part(s) of the application

2. This submission relates to the entire proposal

## Effects of the Proposal

**3.** The key concerns and multiple adverse effects for the environment and community as follows…

**4. The site and surrounding environment**

4.1 The submitters point out that the application omits including the following important points related to the site and surrounding environment when consideration is to be given to building 800 new houses in this location.

4.2 The subject land is located very close to the sea. It is 1.3km southwest of the sea and closer to the Brooklands Lagoon, the waterway which forms part of and is adjacent to the mouth of the Waimakariri river mouth. An obvious adverse effect of the proposal is putting more residential houses in close proximity to sea level rise during climate change.

4.3 A further adverse effect is that the site is located in an area suspectable to increased natural hazards identified since the Canterbury Earthquakes in 2010/12. Importantly it is located in the tsunami zone illustrated in recent Council civil public sessions with Helen Jack. www.cdemcanterbury.govt.nz/hazards/tsunamis

4.4 The URS New Zealand Engineering and Environmental report on geology of the specific site for the Golf Links proposal highlighted the liquefaction susceptibility of the site to lateral spread. In addition, the proposed excavation and creation of wetland and lake in the eastern section of the site may increase the likelihood of lateral spreading issues due to the reduction of lateral constraint.

4.5 The canterbury Earthquake reports on the area show this is exactly what happened. What effective design to mitigate against the potential effects of liquification and lateral spread will specifically be undertaken in this development? https://www.tandfonline.com/doi/full/10.1080/00288306.2016.118292

## 5. To repurpose the no longer viable golf resort outcome.

5.1 The submitters are concerned that LMM picked out the most economically viable parts of the golf resort proposal and discarded important aspects decided under that decision. In particular discarding the decision to use Lower Styx Road as the safest and most effective main entry and exit point to the site and ecological reserve.

## 6. Impact on roads and increased traffic movements

6.1 The submitters point out the proposal does not demonstrate how it will adequately address and better deliver the objectives and policies of the Christchurch District Plan (CDP) in relation to transport outcomes in comparison to the specific purpose Golf Resort zone. It does not assess the consistency of the rezoning against the relevant higher level planning documents to an acceptable level. This was requested by the Council in its request for further information dated 11 June 2025.

6.2 The submitters consider the LMM in its reply to this request in the letter dated 7 July 2025 to be inadequate. The reply cites that because no transport-related adverse effects were identified in its transport assessment, in appendix E, they consider the proposal to be within the strategic policy direction regarding transportation matters.

6.3 The submitters are concerned that the proposal's transport assessment does not demonstrate sufficient evidential assessment and proof that it meets many aspects of the CDP and/or relevant objectives, policies and outcomes of the following higher order planning instruments and strategies namely:

- *Canterbury Regional Policy Statement including the relevant transport objectives and policies in Chapter 5 and 6*
- Greater Christchurch Spatial Plan
- Greater Christchurch Transport Plan
- Canterbury Regional Land Transport Plan 2024
- Ōtautahi Christchurch Future Transport 2024-54

In addition, the submitter considers there will be adverse transport related effects.

**Lower Styx Road access**

6.4 The submitters point out that under the rules in the CDP (13.9.5.1 (a)) for the Specific Purpose (Golf Resort) Zone Whisper Creek stipulates that the accessways would involve a major entrance off Lower Styx Road, an entrance off Spencerville Road and a service road off Teapes Road with restricted access.

6.5 The submitters are concerned that in the proposal, road access is unsafe and inadequate and will have adverse effects because the proposal does not include road access off Lower Styx Road thus this breaches rule 13.9.5.1. above.

6.6 The development of the site was blocked until the intersection of Lower Styx Road and Marshlands Road was signalized, this has now occurred. This option has already been established as the main road access to the development as it is a minor arterial road in the city hierarchy road under the scheme for the required traffic volume in the Golf Resort plan. There will be a higher volume of traffic under the proposal which makes access via Lower Styx Road essential.

6.7 The submitters believe that the ecological value of the land adjacent to the Styx River and in particular the *Source to Sea* walkway project must not be used as a reason for not constructing the bridge across the Styx River as required under the rules for the Golf resort. It should be noted that the Styx River *Source to Sea* project has spasmodic adjacent access to the river edge from the source of the Styx River. This means direct river edge access is not required in this section of the river to fit in with any overall *Source to Sea* accessway adjacent to the river.

6.8 The submitters point out that if a walkway is planned adjacent to the river there can be a tunnel walkway under the new bridge similar to that used in other locations.

6.9 The submitters further point out that the Styx River is recognised as extremely degraded ecologically. No ecological level of significance criteria would warrant changing a transport access to an 800-housing development by excluding a bridge to facilitate access to the housing in order to preserve the ecological significance of the river or adjacent wetlands areas.

6.10 The submitters believe that a main access route off Lower Styx Road is essential to minimize adverse transport-related effects. Including daily congestion, increased crash risk and treacherous exit provisions in light of an urgent excavation in a Tsunami civil defense emergency.

6.11 The main access way off Lower Styx Road is essential to minimize adverse vehicle access and wider transport-related effects. It is pointed out that Lower Styx Road is in better condition than Spencerville, Teapes and Turners roads. Especially given the proposal does not plan on upgrading these roads.

6.12 The submitters are concerned that the proposal states that there will be 720 traffic movements in the AM and PM peak traffic time which is well below the expected level given the two cars plus per household reality in Christchurch. The submitters believe 1600 car movements are a closer estimation, with a total daily movement of 6,560, (applicants' calculation).

6.13 The submitters are further concerned, that the likely high number of multiple person household rentals in the new development will further impact the number of vehicle movements. This proposal for use of the small local road network does not have the capacity to safely accommodate an 800-household increase in traffic. The local roads are in no state to accommodate that increased volume of traffic. Roads would require significant upgrades.

6.14 The submitters are also concerned that the three access roads proposed are in dangerous positions. Access will not have sufficient space to view traffic travelling from the West given its proximity to the corner on Spencerville Road. Further, the access road will compound the safety of the other roads proposed.

6.15 The Proposal's access roads onto Spencerville Road will have adverse traffic and traffic safety effects on the roading network due to the increased number of vehicles accessing the allotments off Spencerville Road. Spencerville road is a narrow local road, with limited streetlights and no footpaths, not designed for this volume of use.

**Spencerville road**

6.16 The submitters point out this road is classified in the scheme as a collector road. It is designated as a low volume local road below the width required by the roading standards. A collector road reflects a lesser dominance of through traffic and a greater role in servicing activities along the route. There are only 14 houses along the road.

6.17 In places the road is not in line with its survey pegs. For example, on the corner of Turners and Spencerville roads on the north side the road is 8 metres away from the survey pegs.

6.18 The submitters point out that the rail crossing on Spencerville Road is inadequate because the approach on both sides are on an angle and the crossing is on a ridge and very rough. This is below standard for any increased volume of traffic.

6.19 The submitters point out that in addition, it is formed as a narrow rural road with 5 metres width of seal with limited shoulders and no footpaths. The bends and undulations in Spencerville Road limit site distances. There is a one-way bridge at the Spencerville end of the road with approaches that give very poor visibility of approaching traffic.

6.20 The intersection of Spencerville and Marshland's Road (Chaney's Corner) is a very dangerous intersection and is of serious concern, even more so if traffic volumes utilising this intersection increase. This is partly because of its geometry and partly because of the inadequacies of the sight line over the rail crossing on Marshland Road, a little to the south of the intersection. Therefore, Chaney's corner will require significant upgrading to the extent of traffic lights and other safety work.

6.21 The submitters point out that these safety difficulties at the intersection on Spencerville/Marshland Road currently force more traffic onto the safer Turners Road. This is reported as happening already by long-term residents of the area.

6.22 The submitters consider the proposals modelling of traffic is deficient. A proposal for such an increased volume of traffic means Spencerville Road use will increase significantly. Spencerville Road will simply not be able to safely service an 800-household increase in its present state. This will require re-alignment and widening to support and cope with this increased volume of traffic.

6.23 The submitters point out that during weekend events at Spencer Park traffic is bumper to bumper on this road. It is the main access from the north to the Councils camping ground at Spencer Park and the volume increases in the summer months.

6.23 The Proposal underestimates the increased use of the one- way bridge on Spencerville Road. Residents will use this bridge in order to access Lower Styx Road to the city. In addition, the bridge provides access to recreational areas such as Spencer Park and Bottle Lake Forest. This bridge would need to be upgraded to a two- lane bridge.

6.24 The submitters consider this is a totally unworkable solution for traffic access to the wider city and Canterbury region.

6.25 The submitters point out that most residents will want to take the easiest road access to the motorway to the city for work and other services. This will be via Lower Styx Road to the on ramp at Belfast Road and will be facilitated by the controlled intersection at Marshland Road.

6.26 Alternatively, the submitters point out there will be a significant increase on Marshland Road to access the city.

6.27 In addition, the lack of public transport in this area must be taken into consideration. The one bus route stopped servicing Spencerville in 2019, consequently there is no public transport in the area.

6.28 The submitters are concerned that effect of the traffic proposal will cause adverse effects such as loss of amenity, adverse environmental impacts and increased traffic volume, accidents, delays and noise.

**Turners Road**

6.29 The road is classified in the District Scheme as a low volume local road below the width required by the roading standards. There will be a significant adverse effect from the increase in traffic movements along Turners Road. The cost of upgrading this road will be substantial for the rate payer.

**Transport Summary**

Overall, the submitters point out that the current roading network is totally inadequate and will require substantial construction work to bring up to the required standards. Therefore, the accumulative costs to the City Council and ultimately the ratepayer of upgrading all aspects of the roads and wider upgrading including the two bridges will be substantial and has not been planned for in the City Council budget.

## 7 Natural hazard risk and tsunamis – adverse effects

7.1 We submit that this proposal has a poorly planned transport plan which will increase the risk of citizens being able to quickly evacuate the area in face of a tsunami warning due to traffic congestion from 800 houses with insufficient road exit access. This breaches the Canterbury Regional Policy statement chapter 6. The policy explains in part that, “Poorly planned development can increase risk from natural hazards and the effects of climate change.”

7.2

In addition, the site is located in an area suspectable to increased natural hazards identified since the Canterbury Earthquakes In 2010/12. Importantly it is located in the tsunami zone. www.cdemcanterbury.govt.nz/hazards/tsunamis

`7.3 **New Sea Level Research**

*( Marine Environment 2025 – Ministry for the Environment)*

The newly released Extreme Coastal flood maps for Aotearoa NZ identifies areas in the development to be likely subject to coastal flooding as well as inundation from the Styx River. The submitters suggest developing a Residential New Neighbourhood Zone this close to the coast is unwise.

## 8 Three Waters – adverse effects

### 8.1 Potable water supply

The Christchurch city council has confirmed that there is insufficient fresh water supply for this development from its network. The development proposal suggests the use of either existing bores or new ones, with an associated water treatment plant to meet the developments requirements. The submitters are concerned that the existing bores were meant to be removed following testing as part of the Golf Course proposal, which hasn't happened. Secondly this issue is in the domain of Ecan, which has over allocated fresh water supplies within the canterbury catchment, so any new development could have a negative impact on other wells nearby.

### 8.2 Waste Water

The submitters are concerned that this development is planning to use the Kainga/Spencerville waste water network, which does not have the capacity for an additional 800 houses. The system was designed to meet the Kainga, Brooklands and Spencerville areas needs and allow for storm peak factor margins including infiltration.

The Brooklands area has been red zoned which reduces the load on the network by approximately by 470 dwellings, however another approximately 50 dwellings have been added in the Kainga area which means a further 420 could be serviced theoretically. However, it has been identified that the pumping station efficiency has been markedly reduced from its original design of 40 litres per second to 29.95 litres.

The model that has been proposed assumes that after so called proactive maintenance, this could recover the pump performance. There is no evidence at this stage that this is possible. The model also ignores the fact that the main line water discharge network has been significantly damaged by the earthquake and the infiltration and inflow will be much higher than what is allowed in the calculations following the earthquakes and the slumping of land levels in the existing built areas. The issue of 'surplus' capacity of the existing system would be much better used for infill housing and extensions of existing communities rather than a green fields site.

8.3 **Stormwater**

The submitters are concerned about the increase and the rapidity of the storm water discharge due to the significant area of buildings and hard stand areas into the retention ponds, which in turn flow into the Spencer Drain. The basins provided appear to be too small and being placed in the flood zone means they can easily become inundated in a major event. The Spencer Drain, which is the only major discharge route is 3000 metres long, but only has a fall of half a metre of fall giving a gradient of 1/6000. This is entirely inadequate to deal with the current storm water discharge, let alone the increase in rate caused by the hard standing areas and roofs.

There are two further factors which have not been considered by the applicant, which are the pumping station which is the only effective route which storm water can be disposed of into the Styx River in a storm event. These pumps have not been considered in the model provided, and neither the fact that the level of the Styx River is controlled by the flood gates at its terminus. These gates are opened and closed on tidal flows and when the Waimakariri is in flood they can remain closed, which allows the Styx River to breach the stop banks and cause extensive flooding. The submitters need to be satisfied that these are addressed prior to any approval. The flood gates need to be upgraded to mechanical control, accompanied by additional pumps.

## 9 Ecology – further adverse effects

9.1 **Styx River Corridor**

The greater Styx River corridor is home to a range of endangered species, including lizards/geckos, eels, lampreys and a variety of birds. The application has no comprehensive plan for the protection of species or their relocation, including alternative foraging and nesting sites. The submitters would recommend the flood plain, which is currently grazed and is a source of faecal contamination during flood events should not be rezoned to Rural Urban Fringe but to a Conservation Zoning and be a condition of any approval if it was decided to allow the private plan change. Additionally, this would open up the site for community and ecological benefit rather than be off limits as proposed.

9.2 The Styx River is significantly degraded and the most recent survey of the river was undertaken by Boffa Miskell on behalf of the Christchurch City Council in 2023. It is interesting to note that the applicants ecological impact assessment does not reference this report, which demonstrates an ongoing deterioration in the river, with increasing levels of zinc and other metals.

"Elevated zinc concentrations can reflect the urbanisation of catchments (e.g., galvanised roofing and spouting can be major sources of zinc). Best practice stormwater management techniques should be prioritised where urban development is increasing. Untreated, or poorly treated, stormwater can bring contaminants into waterways, which can be toxic to freshwater fauna. This is especially important for the Pūharakekenui / Styx River catchment where EPT taxa, including mayflies still occur." (*Pūharakekenui*

*Styx River catchment, Five-yearly and annual aquatic ecology monitoring. Prepared for the Christchurch City Council by Boffa Miskell. 4 September 2023)*

The build up of sediment associated with urbanisation of catchments is also having a major negative impact on the river. The current methods of attempting to deal with both these issues have proved ineffective, and if this development was to proceed it would only worsen the current degradation. This silt, as shown in the report, is building up and causes invertebrate to die, leading to a collapse in the food chain.

## 10. Community Amenity Issues – further adverse effects

### 10.1 Urbanisation

The submitters are concerned that this development will increase the number of houses in the Ouruhia area by 1330%. Rather than having a bucolic outlook, there will be an intensive urbanisation of homes on small sections, which is in contrast to the surrounding area, where individual sites or single houses are usually around 1000 square metres with an open environment.

| **Census Dwellings per Square Kilometre 2023*** | | | |
|---|---|---|---|
| **Area** | **Total Dwellings** | **Area Square Kilometre** | **Dwelling per Square Kilometre** |
| Ouruhia | 60 | 2.67 | 22.5 |
| Brooklands-Spencerville | 267 | 7.25 | 36.8 |
| Marshlands | 228 | 7.99 | 28.5 |

**Census data is rounded to a multiple of 3 to protect individual anonymity. Summing across categories can therefore lead to compounded errors and totals not equalling 100%.*

The proposal has no controls over the visual aspects of the design and construction of the homes, unlike the Golf proposal, which had strong design elements to blend into the surrounding countryside with wide open space with set backs of 50 to 100 metres from roads and surrounding properties. This proposal only has a 5-metre strip around the development, and 10 metre setbacks to buildings, which is entirely inappropriate in a rural area. Additionally, there are no lighting plans to protect the night sky with low lighting street lights. Unlike the Golf resort proposal there is only a very small increase in public access to the river and flood plain area, but no proposed improvement in the road side swales for drainage or footpaths, which are important for residents, including school children.

### 10.2 Reverse effects

This is primarily a rural farming area with a significant number of rural associated vehicle movements, including tractors and truck and trailer units on a daily basis. During the summer irrigation is undertaken 24/7 which

inevitability does result in some noise as well. With disproportionate urban development this could result in difficulties between residents and the farming community.

10.3 **Commercial Area**

The proposal includes a commercial area, but no associated guidelines as to the activities which will be permitted. The submitters see that the hours of operation and the type of activities undertaken are directly related to the community and should not include antisocial or toxic activities. E.g. public bars, liquor store, vape shops etc.

**11 Economic benefits**

The proposal outlines a list of supposed economic benefits for the community. The submitters would contest that as this development is only a short one-off exercise, whereas the previous golf course was an ongoing business employing a large number of people and improving the ecological and social environment for the community. This proposal places a large urban development crammed into a narrow terrace with no support structure e.g. public transport, library, medical centre or swimming pool. The submitters see that this development is negative to both the environment and local community.

**12 Broadcasting transmitter and mast situated at 143 Lower Styx Road – further adverse effects**

The submitters are concerned that this proposal will have a very large and concentrated areas of housing close to the radio mast which is 137 metres high. It has been shown that such towers do cause potentially harmful radio frequency fields to human health. For this reason, the original consent allowed its construction as “this particular location is reasonably isolated from surrounding houses and about 700 metres from the nearest road”. The council has accepted in the past that a rural zone is appropriate for such masts.

An article by respected scientist Dr. Neil Cherry, outlining the dangers associated with high radio frequencies. It was never envisaged that a high-density housing development would be built so close to the aerial and should not allowed to proceed. (*Health Effects in the vicinity of Radio/TV towers and mobile phone base stations. Dr Neil Cherry O.N.Z.M. Associate Professor of Environmental Health. 6th September 2002).*

**13. Construction -further adverse effects**

The submitters are concerned regarding the potential noise, dust and general nuisance to be caused by this development if it were to go ahead. There needs to be a sequence development plan with strong environmental and construction controls if the proposal is approved. We would submit, that prior to any construction or development of the facilities that the bridge over the Styx River be constructed and this be the only entrance to the development during construction. The volumes of fill required will involve

thousands of truck loads, which will be entirely unsuitable for the road network and be deleterious for the health and welfare of the residents. Unlike the golf course where there was only internal movement of fill. This project will require substantial fill from outside sources, which can result in contamination to the site here and ultimately the river. If the development was to be approved there needs to be frequent and independent monitoring of all materials entering the site.

Hours of work need to be restricted to 7 a.m. – 6 p.m. Monday to Friday and 7 a.m. -12 noon on Saturday.

**14 Demand**

The proposal suggests there is a high demand for development in this area, however, no evidence is provided. In fact, because of the red zoning of Brooklands and associated earthquake damage to the area there is a natural caution from potential buyers to commit to this area. The CCC has already made it clear that in its long-term plan it has identified sufficient land zoned for development for the next 30 years. Together these issues negate the submission by LMM regarding potential demand for a subdivision which has many negating factors for approval including transport, flooding and inundation, lack of infrastructure, and poor geological history.

**15 Cultural values**

Local Ngai Tahu members have raised the issue of traditional pathway between Ngai Tuhariri Pa to the sea. As there appears to have been no significant archaeological study of the area, this needs to be completed prior to any development. We have written to Ngai Tahu regarding this matter and are awaiting their reply.

**16 Contamination – further adverse effects**

The contamination report provided to the submitters is deficient in a number of areas.

These include the fact that part of the upper terrace along Turners Road has been and is actively market gardened. Historically this farm has also produced on the lower levels horticultural crops e.g. potatoes, onions etc.. Additionally, the Boffa Miskell report (2004) identifies further potential areas of contamination not included in the applicants' report.
Further significant independent testing for contamination should be undertaken before any development.

**17 Consultation**

There has been no broad consultation with the community. We do understand that there has been some interaction between the developer and at least some of the owners of the 4 hectare blocks which he is attempting to rezone. This is in stark contrast with the developers of the previous Special Purpose Golf Course developers who did consult quite widely with the community.

It should be noted that the applicant is only able to demonstrate ownership and control of 63.79 hectares of the total area of 170 hectares of the proposed rezoned land. This raises the issue of how the applicant is going to reach the 800 section threshold.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

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**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Definitely excess water going into the Styx river, size of sections minimum 1000 sq

**Reason for Decision Requested:**

### Specific Provisions

Excess water in area due to new subdivision

### Reasons

I'm very concerned about the water level increasing in lowerstyx river and the flood plan as it will affect us all going forward, will there be added traffic lights to the area ? Size of the sections as we don't want a rabbit warren like Preston's min 1000 Sq

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# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Cora **Last name:** Howison

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**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
No further housing development to done in the area

**Reason for Decision Requested:**

### Specific Provisions

All of it

### Reasons

It's effect on the neighbouring community: - A lot more people/traffic causing it to be a lot busier, noisier and potential dangers especially if needing to leave area due to Tsunami for example - Roads are not designed for more traffic. Meaning upgrades will need to happen, meaning current residents will have rates increase - the water quality to the Styx River has already deteriorated greatly. This will not help at all - Spencerville community is a great community, that will change with the number of houses proposed to be built - The attraction of Spencerville is the rural feel it has with the surrounding farm land, don't take it away

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

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**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
i do not want the subdivision to go ahead, because of the impacts on the roads ,river ,traffic, wastewater

**Reason for Decision Requested:**

### Specific Provisions

environment concerns flood risk adjacent to styx river it is within the High Flood Management Area vulnerable to tsunami and climate change ,water pressure is already poor. water quality is already showing Zink contamination and sedimentation. Evacuation Risks during a tsunami ,one lane bridge on spencerville road we could have a river surge to cut off access services could not manage evacuation of thousands with current infrastructure roads are rural-scale and are unsafe for high traffic ,breaching CDP rules ? wastewater ;existing Kainga/Spencerville network lacks capacity; The developers own fast-track application claims that three-waters servicing design solutions are readily available and that rezoning will not place any additional demand on the network infrastructure, this assertion is misleading, as independent evidence shows the local water supply is insufficient, the wastewater network is already under capacity stress and stormwater systems are highly vulnerable. please explain why the council have not looked into this.

### Reasons

all of the issues above

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

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**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Neutral**
**Decision Requested:**
A Transport Impact Assessment must be submitted and approved. Where impacts exceed the defined thresholds, the developer must fund and deliver intersection upgrades, pedestrian and cycle separated paths, and traffic calming measures. All development

must include on-site stormwater detention sized to ensure no net increase in 10-year and 100-year peak flows to downstream receiving environments, use water-sensitive urban design for first-flush treatment, and include an approved framework to prevent groundwater contamination. A groundwater protection and monitoring plan is required prior to subdivision consent, including baseline monitoring, restrictions on contaminant-generating land uses within defined zones, and five years of post-construction monitoring funded by the developer. Minimum riparian buffer of [suggest 10–20 m depending on location] from the top of bank, native planting for habitat connectivity, and construction timing restrictions to avoid native fauna breeding seasons.

**Reason for Decision Requested:**

## Specific Provisions

I neither support nor oppose the plan change in principle but have the following specific concerns that I seek to be addressed. Traffic and road network management — Concerned about increased vehicle movements, safety for pedestrians and cyclists, and intersection capacity on Turners Road and Spencerville Road. Request that the Outline Development Plan requires a Traffic Impact Assessment; thresholds for when intersection upgrades, signalisation, or roundabouts are triggered; safe separated walking and cycling routes linking the neighbourhood to the Neighbourhood Centre and existing network; and vehicle access standards that minimise local street through-traffic. Stormwater management and groundwater protection — Concerned that increased impervious surfaces will increase runoff and risk to the Styx River and local groundwater. Request that the Outline Development Plan require on-site stormwater detention and treatment, low-impact design (rain gardens, permeable pavements), and a contaminant management plan to protect groundwater and the Styx catchment. Underground (ground) water pollution — Concerned about long-term contamination risks from construction, road runoff, and any commercial uses in the Neighbourhood Centre. Request explicit groundwater protection measures: limits on contaminant-generating land uses near the catchment, mandatory separation distances from sensitive recharge areas, monitoring wells and a long-term groundwater quality monitoring programme funded by the developer. Wildlife and animal welfare (ecology) — Concerned for fauna using waterways, riparian margins and adjacent open space. Request increased native riparian buffer widths in the Outline Development Plan; mandatory planting of native species that provide habitat connectivity; construction timing restrictions to avoid breeding seasons; and specific measures for humane relocation / mitigation where wild animals are affected by earthworks.

## Reasons

I live in this zoning

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Marcus **Last name:** van Valkenburg

**Prefered method of contact**

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**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Dismiss the application

**Reason for Decision Requested:**

### Specific Provisions

The whole proposal

**Reasons**

We are against the rezoning or the golf course -see attached document

**Name of submitters**

**Ouruhia Residents Group – Contact George Nimmo**
**(See attached signatures)**

## Application to which submission relates

1. This is a submission on an application by LMM Investments 2012 (the applicant /the proposal)

   This submission relates to the section 32 evaluation of the plan change and all related documents submitted by LMM and documents prepared by the Christchurch City Council (CCC) and any other relevant documents.

The submitters oppose all aspects of the proposal

## Relevant part(s) of the application

2. This submission relates to the entire proposal

## Effects of the Proposal

**3.** The key concerns and multiple adverse effects for the environment and community as follows…

**4. The site and surrounding environment**

4.1 The submitters point out that the application omits including the following important points related to the site and surrounding environment when consideration is to be given to building 800 new houses in this location.

4.2 The subject land is located very close to the sea. It is 1.3km southwest of the sea and closer to the Brooklands Lagoon, the waterway which forms part of and is adjacent to the mouth of the Waimakariri river mouth. An obvious adverse effect of the proposal is putting more residential houses in close proximity to sea level rise during climate change.

4.3 A further adverse effect is that the site is located in an area suspectable to increased natural hazards identified since the Canterbury Earthquakes in 2010/12. Importantly it is located in the tsunami zone illustrated in recent Council civil public sessions with Helen Jack. www.cdemcanterbury.govt.nz/hazards/tsunamis

4.4 The URS New Zealand Engineering and Environmental report on geology of the specific site for the Golf Links proposal highlighted the liquefaction susceptibility of the site to lateral spread. In addition, the proposed excavation and creation of wetland and lake in the eastern section of the site may increase the likelihood of lateral spreading issues due to the reduction of lateral constraint.

4.5 The canterbury Earthquake reports on the area show this is exactly what happened. What effective design to mitigate against the potential effects of liquification and lateral spread will specifically be undertaken in this development? https://www.tandfonline.com/doi/full/10.1080/00288306.2016.118292

## 5. To repurpose the no longer viable golf resort outcome.

5.1 The submitters are concerned that LMM picked out the most economically viable parts of the golf resort proposal and discarded important aspects decided under that decision. In particular discarding the decision to use Lower Styx Road as the safest and most effective main entry and exit point to the site and ecological reserve.

## 6. Impact on roads and increased traffic movements

6.1 The submitters point out the proposal does not demonstrate how it will adequately address and better deliver the objectives and policies of the Christchurch District Plan (CDP) in relation to transport outcomes in comparison to the specific purpose Golf Resort zone. It does not assess the consistency of the rezoning against the relevant higher level planning documents to an acceptable level. This was requested by the Council in its request for further information dated 11 June 2025.

6.2 The submitters consider the LMM in its reply to this request in the letter dated 7 July 2025 to be inadequate. The reply cites that because no transport-related adverse effects were identified in its transport assessment, in appendix E, they consider the proposal to be within the strategic policy direction regarding transportation matters.

6.3 The submitters are concerned that the proposal's transport assessment does not demonstrate sufficient evidential assessment and proof that it meets many aspects of the CDP and/or relevant objectives, policies and outcomes of the following higher order planning instruments and strategies namely:

- *Canterbury Regional Policy Statement including the relevant transport objectives and policies in Chapter 5 and 6*
- Greater Christchurch Spatial Plan
- Greater Christchurch Transport Plan
- Canterbury Regional Land Transport Plan 2024
- Ōtautahi Christchurch Future Transport 2024-54

In addition, the submitter considers there will be adverse transport related effects.

**Lower Styx Road access**

6.4 The submitters point out that under the rules in the CDP (13.9.5.1 (a)) for the Specific Purpose (Golf Resort) Zone Whisper Creek stipulates that the accessways would involve a major entrance off Lower Styx Road, an entrance off Spencerville Road and a service road off Teapes Road with restricted access.

6.5 The submitters are concerned that in the proposal, road access is unsafe and inadequate and will have adverse effects because the proposal does not include road access off Lower Styx Road thus this breaches rule 13.9.5.1. above.

6.6 The development of the site was blocked until the intersection of Lower Styx Road and Marshlands Road was signalized, this has now occurred. This option has already been established as the main road access to the development as it is a minor arterial road in the city hierarchy road under the scheme for the required traffic volume in the Golf Resort plan. There will be a higher volume of traffic under the proposal which makes access via Lower Styx Road essential.

6.7 The submitters believe that the ecological value of the land adjacent to the Styx River and in particular the *Source to Sea* walkway project must not be used as a reason for not constructing the bridge across the Styx River as required under the rules for the Golf resort. It should be noted that the Styx River *Source to Sea* project has spasmodic adjacent access to the river edge from the source of the Styx River. This means direct river edge access is not required in this section of the river to fit in with any overall *Source to Sea* accessway adjacent to the river.

6.8 The submitters point out that if a walkway is planned adjacent to the river there can be a tunnel walkway under the new bridge similar to that used in other locations.

6.9 The submitters further point out that the Styx River is recognised as extremely degraded ecologically. No ecological level of significance criteria would warrant changing a transport access to an 800-housing development by excluding a bridge to facilitate access to the housing in order to preserve the ecological significance of the river or adjacent wetlands areas.

6.10 The submitters believe that a main access route off Lower Styx Road is essential to minimize adverse transport-related effects. Including daily congestion, increased crash risk and treacherous exit provisions in light of an urgent excavation in a Tsunami civil defense emergency.

6.11 The main access way off Lower Styx Road is essential to minimize adverse vehicle access and wider transport-related effects. It is pointed out that Lower Styx Road is in better condition than Spencerville, Teapes and Turners roads. Especially given the proposal does not plan on upgrading these roads.

6.12 The submitters are concerned that the proposal states that there will be 720 traffic movements in the AM and PM peak traffic time which is well below the expected level given the two cars plus per household reality in Christchurch. The submitters believe 1600 car movements are a closer estimation, with a total daily movement of 6,560, (applicants' calculation).

6.13 The submitters are further concerned, that the likely high number of multiple person household rentals in the new development will further impact the number of vehicle movements. This proposal for use of the small local road network does not have the capacity to safely accommodate an 800-household increase in traffic. The local roads are in no state to accommodate that increased volume of traffic. Roads would require significant upgrades.

6.14 The submitters are also concerned that the three access roads proposed are in dangerous positions. Access will not have sufficient space to view traffic travelling from the West given its proximity to the corner on Spencerville Road. Further, the access road will compound the safety of the other roads proposed.

6.15 The Proposal's access roads onto Spencerville Road will have adverse traffic and traffic safety effects on the roading network due to the increased number of vehicles accessing the allotments off Spencerville Road. Spencerville road is a narrow local road, with limited streetlights and no footpaths, not designed for this volume of use.

**Spencerville road**

6.16 The submitters point out this road is classified in the scheme as a collector road. It is designated as a low volume local road below the width required by the roading standards. A collector road reflects a lesser dominance of through traffic and a greater role in servicing activities along the route. There are only 14 houses along the road.

6.17 In places the road is not in line with its survey pegs. For example, on the corner of Turners and Spencerville roads on the north side the road is 8 metres away from the survey pegs.

6.18 The submitters point out that the rail crossing on Spencerville Road is inadequate because the approach on both sides are on an angle and the crossing is on a ridge and very rough. This is below standard for any increased volume of traffic.

6.19 The submitters point out that in addition, it is formed as a narrow rural road with 5 metres width of seal with limited shoulders and no footpaths. The bends and undulations in Spencerville Road limit site distances. There is a one-way bridge at the Spencerville end of the road with approaches that give very poor visibility of approaching traffic.

6.20 The intersection of Spencerville and Marshland's Road (Chaney's Corner) is a very dangerous intersection and is of serious concern, even more so if traffic volumes utilising this intersection increase. This is partly because of its geometry and partly because of the inadequacies of the sight line over the rail crossing on Marshland Road, a little to the south of the intersection. Therefore, Chaney's corner will require significant upgrading to the extent of traffic lights and other safety work.

6.21 The submitters point out that these safety difficulties at the intersection on Spencerville/Marshland Road currently force more traffic onto the safer Turners Road. This is reported as happening already by long-term residents of the area.

6.22 The submitters consider the proposals modelling of traffic is deficient. A proposal for such an increased volume of traffic means Spencerville Road use will increase significantly. Spencerville Road will simply not be able to safely service an 800-household increase in its present state. This will require re-alignment and widening to support and cope with this increased volume of traffic.

6.23 The submitters point out that during weekend events at Spencer Park traffic is bumper to bumper on this road. It is the main access from the north to the Councils camping ground at Spencer Park and the volume increases in the summer months.

6.23 The Proposal underestimates the increased use of the one- way bridge on Spencerville Road. Residents will use this bridge in order to access Lower Styx Road to the city. In addition, the bridge provides access to recreational areas such as Spencer Park and Bottle Lake Forest. This bridge would need to be upgraded to a two- lane bridge.

6.24 The submitters consider this is a totally unworkable solution for traffic access to the wider city and Canterbury region.

6.25 The submitters point out that most residents will want to take the easiest road access to the motorway to the city for work and other services. This will be via Lower Styx Road to the on ramp at Belfast Road and will be facilitated by the controlled intersection at Marshland Road.

6.26 Alternatively, the submitters point out there will be a significant increase on Marshland Road to access the city.

6.27 In addition, the lack of public transport in this area must be taken into consideration. The one bus route stopped servicing Spencerville in 2019, consequently there is no public transport in the area.

6.28 The submitters are concerned that effect of the traffic proposal will cause adverse effects such as loss of amenity, adverse environmental impacts and increased traffic volume, accidents, delays and noise.

**Turners Road**

6.29 The road is classified in the District Scheme as a low volume local road below the width required by the roading standards. There will be a significant adverse effect from the increase in traffic movements along Turners Road. The cost of upgrading this road will be substantial for the rate payer.

**Transport Summary**

Overall, the submitters point out that the current roading network is totally inadequate and will require substantial construction work to bring up to the required standards. Therefore, the accumulative costs to the City Council and ultimately the ratepayer of upgrading all aspects of the roads and wider upgrading including the two bridges will be substantial and has not been planned for in the City Council budget.

## 7 Natural hazard risk and tsunamis – adverse effects

7.1 We submit that this proposal has a poorly planned transport plan which will increase the risk of citizens being able to quickly evacuate the area in face of a tsunami warning due to traffic congestion from 800 houses with insufficient road exit access. This breaches the Canterbury Regional Policy statement chapter 6. The policy explains in part that, “Poorly planned development can increase risk from natural hazards and the effects of climate change.”

7.2

In addition, the site is located in an area suspectable to increased natural hazards identified since the Canterbury Earthquakes In 2010/12. Importantly it is located in the tsunami zone. www.cdemcanterbury.govt.nz/hazards/tsunamis

`7.3 **New Sea Level Research**

*( Marine Environment 2025 – Ministry for the Environment)*

The newly released Extreme Coastal flood maps for Aotearoa NZ identifies areas in the development to be likely subject to coastal flooding as well as inundation from the Styx River. The submitters suggest developing a Residential New Neighbourhood Zone this close to the coast is unwise.

## 8 Three Waters – adverse effects

### 8.1 Potable water supply

The Christchurch city council has confirmed that there is insufficient fresh water supply for this development from its network. The development proposal suggests the use of either existing bores or new ones, with an associated water treatment plant to meet the developments requirements. The submitters are concerned that the existing bores were meant to be removed following testing as part of the Golf Course proposal, which hasn't happened. Secondly this issue is in the domain of Ecan, which has over allocated fresh water supplies within the canterbury catchment, so any new development could have a negative impact on other wells nearby.

### 8.2 Waste Water

The submitters are concerned that this development is planning to use the Kainga/Spencerville waste water network, which does not have the capacity for an additional 800 houses. The system was designed to meet the Kainga, Brooklands and Spencerville areas needs and allow for storm peak factor margins including infiltration.

The Brooklands area has been red zoned which reduces the load on the network by approximately by 470 dwellings, however another approximately 50 dwellings have been added in the Kainga area which means a further 420 could be serviced theoretically. However, it has been identified that the pumping station efficiency has been markedly reduced from its original design of 40 litres per second to 29.95 litres.

The model that has been proposed assumes that after so called proactive maintenance, this could recover the pump performance. There is no evidence at this stage that this is possible. The model also ignores the fact that the main line water discharge network has been significantly damaged by the earthquake and the infiltration and inflow will be much higher than what is allowed in the calculations following the earthquakes and the slumping of land levels in the existing built areas. The issue of 'surplus' capacity of the existing system would be much better used for infill housing and extensions of existing communities rather than a green fields site.

8.3 **Stormwater**

The submitters are concerned about the increase and the rapidity of the storm water discharge due to the significant area of buildings and hard stand areas into the retention ponds, which in turn flow into the Spencer Drain. The basins provided appear to be too small and being placed in the flood zone means they can easily become inundated in a major event. The Spencer Drain, which is the only major discharge route is 3000 metres long, but only has a fall of half a metre of fall giving a gradient of 1/6000. This is entirely inadequate to deal with the current storm water discharge, let alone the increase in rate caused by the hard standing areas and roofs.

There are two further factors which have not been considered by the applicant, which are the pumping station which is the only effective route which storm water can be disposed of into the Styx River in a storm event. These pumps have not been considered in the model provided, and neither the fact that the level of the Styx River is controlled by the flood gates at its terminus. These gates are opened and closed on tidal flows and when the Waimakariri is in flood they can remain closed, which allows the Styx River to breach the stop banks and cause extensive flooding. The submitters need to be satisfied that these are addressed prior to any approval. The flood gates need to be upgraded to mechanical control, accompanied by additional pumps.

## 9 Ecology – further adverse effects

9.1 **Styx River Corridor**

The greater Styx River corridor is home to a range of endangered species, including lizards/geckos, eels, lampreys and a variety of birds. The application has no comprehensive plan for the protection of species or their relocation, including alternative foraging and nesting sites. The submitters would recommend the flood plain, which is currently grazed and is a source of faecal contamination during flood events should not be rezoned to Rural Urban Fringe but to a Conservation Zoning and be a condition of any approval if it was decided to allow the private plan change. Additionally, this would open up the site for community and ecological benefit rather than be off limits as proposed.

9.2 The Styx River is significantly degraded and the most recent survey of the river was undertaken by Boffa Miskell on behalf of the Christchurch City Council in 2023. It is interesting to note that the applicants ecological impact assessment does not reference this report, which demonstrates an ongoing deterioration in the river, with increasing levels of zinc and other metals.

"Elevated zinc concentrations can reflect the urbanisation of catchments (e.g., galvanised roofing and spouting can be major sources of zinc). Best practice stormwater management techniques should be prioritised where urban development is increasing. Untreated, or poorly treated, stormwater can bring contaminants into waterways, which can be toxic to freshwater fauna. This is especially important for the Pūharakekenui / Styx River catchment where EPT taxa, including mayflies still occur." (*Pūharakekenui*

*Styx River catchment, Five-yearly and annual aquatic ecology monitoring. Prepared for the Christchurch City Council by Boffa Miskell. 4 September 2023)*

The build up of sediment associated with urbanisation of catchments is also having a major negative impact on the river. The current methods of attempting to deal with both these issues have proved ineffective, and if this development was to proceed it would only worsen the current degradation. This silt, as shown in the report, is building up and causes invertebrate to die, leading to a collapse in the food chain.

## 10. Community Amenity Issues – further adverse effects

### 10.1 Urbanisation

The submitters are concerned that this development will increase the number of houses in the Ouruhia area by 1330%. Rather than having a bucolic outlook, there will be an intensive urbanisation of homes on small sections, which is in contrast to the surrounding area, where individual sites or single houses are usually around 1000 square metres with an open environment.

| **Census Dwellings per Square Kilometre 2023*** | | | |
|---|---|---|---|
| **Area** | **Total Dwellings** | **Area Square Kilometre** | **Dwelling per Square Kilometre** |
| Ouruhia | 60 | 2.67 | 22.5 |
| Brooklands-Spencerville | 267 | 7.25 | 36.8 |
| Marshlands | 228 | 7.99 | 28.5 |

**Census data is rounded to a multiple of 3 to protect individual anonymity. Summing across categories can therefore lead to compounded errors and totals not equalling 100%.*

The proposal has no controls over the visual aspects of the design and construction of the homes, unlike the Golf proposal, which had strong design elements to blend into the surrounding countryside with wide open space with set backs of 50 to 100 metres from roads and surrounding properties. This proposal only has a 5-metre strip around the development, and 10 metre setbacks to buildings, which is entirely inappropriate in a rural area. Additionally, there are no lighting plans to protect the night sky with low lighting street lights. Unlike the Golf resort proposal there is only a very small increase in public access to the river and flood plain area, but no proposed improvement in the road side swales for drainage or footpaths, which are important for residents, including school children.

### 10.2 Reverse effects

This is primarily a rural farming area with a significant number of rural associated vehicle movements, including tractors and truck and trailer units on a daily basis. During the summer irrigation is undertaken 24/7 which

inevitability does result in some noise as well. With disproportionate urban development this could result in difficulties between residents and the farming community.

10.3 **Commercial Area**

The proposal includes a commercial area, but no associated guidelines as to the activities which will be permitted. The submitters see that the hours of operation and the type of activities undertaken are directly related to the community and should not include antisocial or toxic activities. E.g. public bars, liquor store, vape shops etc.

**11 Economic benefits**

The proposal outlines a list of supposed economic benefits for the community. The submitters would contest that as this development is only a short one-off exercise, whereas the previous golf course was an ongoing business employing a large number of people and improving the ecological and social environment for the community. This proposal places a large urban development crammed into a narrow terrace with no support structure e.g. public transport, library, medical centre or swimming pool. The submitters see that this development is negative to both the environment and local community.

**12 Broadcasting transmitter and mast situated at 143 Lower Styx Road – further adverse effects**

The submitters are concerned that this proposal will have a very large and concentrated areas of housing close to the radio mast which is 137 metres high. It has been shown that such towers do cause potentially harmful radio frequency fields to human health. For this reason, the original consent allowed its construction as “this particular location is reasonably isolated from surrounding houses and about 700 metres from the nearest road”. The council has accepted in the past that a rural zone is appropriate for such masts.

An article by respected scientist Dr. Neil Cherry, outlining the dangers associated with high radio frequencies. It was never envisaged that a high-density housing development would be built so close to the aerial and should not allowed to proceed. (*Health Effects in the vicinity of Radio/TV towers and mobile phone base stations. Dr Neil Cherry O.N.Z.M. Associate Professor of Environmental Health. 6th September 2002).*

**13. Construction -further adverse effects**

The submitters are concerned regarding the potential noise, dust and general nuisance to be caused by this development if it were to go ahead. There needs to be a sequence development plan with strong environmental and construction controls if the proposal is approved. We would submit, that prior to any construction or development of the facilities that the bridge over the Styx River be constructed and this be the only entrance to the development during construction. The volumes of fill required will involve

thousands of truck loads, which will be entirely unsuitable for the road network and be deleterious for the health and welfare of the residents. Unlike the golf course where there was only internal movement of fill. This project will require substantial fill from outside sources, which can result in contamination to the site here and ultimately the river. If the development was to be approved there needs to be frequent and independent monitoring of all materials entering the site.

Hours of work need to be restricted to 7 a.m. – 6 p.m. Monday to Friday and 7 a.m. -12 noon on Saturday.

**14 Demand**

The proposal suggests there is a high demand for development in this area, however, no evidence is provided. In fact, because of the red zoning of Brooklands and associated earthquake damage to the area there is a natural caution from potential buyers to commit to this area. The CCC has already made it clear that in its long-term plan it has identified sufficient land zoned for development for the next 30 years. Together these issues negate the submission by LMM regarding potential demand for a subdivision which has many negating factors for approval including transport, flooding and inundation, lack of infrastructure, and poor geological history.

**15 Cultural values**

Local Ngai Tahu members have raised the issue of traditional pathway between Ngai Tuhariri Pa to the sea. As there appears to have been no significant archaeological study of the area, this needs to be completed prior to any development. We have written to Ngai Tahu regarding this matter and are awaiting their reply.

**16 Contamination – further adverse effects**

The contamination report provided to the submitters is deficient in a number of areas.

These include the fact that part of the upper terrace along Turners Road has been and is actively market gardened. Historically this farm has also produced on the lower levels horticultural crops e.g. potatoes, onions etc.. Additionally, the Boffa Miskell report (2004) identifies further potential areas of contamination not included in the applicants' report.
Further significant independent testing for contamination should be undertaken before any development.

**17 Consultation**

There has been no broad consultation with the community. We do understand that there has been some interaction between the developer and at least some of the owners of the 4 hectare blocks which he is attempting to rezone. This is in stark contrast with the developers of the previous Special Purpose Golf Course developers who did consult quite widely with the community.

It should be noted that the applicant is only able to demonstrate ownership and control of 63.79 hectares of the total area of 170 hectares of the proposed rezoned land. This raises the issue of how the applicant is going to reach the 800 section threshold.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Deanna **Last name:** Riwaka

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**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Decline outright the proposed submission. Leave it as is

**Reason for Decision Requested:**

## Specific Provisions

The rezoning of the special Purpose Golf resort to Residential New Neighbourhood zone The rezoning of to Rural urban fringe zone

## Reasons

Having lived in Spencerville for 4 years, we have twice seen the severe flooding across the river in the areas noted. Photos attached showing this. Where will the flood water go when this happens again? Current use of farm land should continue. Damage to the Styx River would occur - Poor water quality. Hugely negative impact on native inanga which use the Styx River as breeding grounds. Local Iwi would need to be consulted. Additional costs to rate payers to upgrade roads and bridges in surrounding areas.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Colin John **Last name:** Mitchell

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**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
As above

**Reason for Decision Requested:**

### Specific Provisions

Roads traffic Drainage Water Flooding

**Reasons**

Roading ( volume off traffic ) Drainage ( stormwater & sewage ) Water ( from where ) Flooding

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# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** David **Last name:** Elkington

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**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Reject the application in its entirety. Private Plan Change 23 poses unacceptable risks to environmental safety, community wellbeing, emergency management, equity for existing homeowners, and infrastructure capacity. The developer's proposed

services are substandard, unsafe, and unrealistic, and the process has not been fair or transparent, failing to properly consult, disclose, or address critical issues.

**Reason for Decision Requested:**

## Specific Provisions

The entirety of Private Plan Change 23 (Whisper Creek Residential), including: - The rezoning of land from Special Purpose (Golf Resort) and Rural Urban Fringe to Residential New Neighbourhood. - All associated provisions relating to land use, density, infrastructure servicing (water, wastewater, stormwater, transport), hazard management, ecological protection, and community facilities. - The section 32 evaluation, supporting documents, and the developer's fast-track application response.

## Reasons

1. Current Zoning vs Proposed Rezoning - The site is currently zoned Special Purpose (Golf Resort) and Rural Urban Fringe, reflecting hazard avoidance, ecological sensitivity, and rural character. - The proposal seeks rezoning to Residential New Neighbourhood, enabling up to 800 houses and a commercial centre. - This rezoning contradicts the Christchurch District Plan, undermines strategic planning, and sets a precedent for urban sprawl into hazard-prone rural land. 2. Environmental Concerns - Flood risk: Adjacent to Styx River, within High Flood Management Area. - Sea level rise & tsunami risk: Only 1.3 km from the coast and Brooklands Lagoon; vulnerable to climate change. - Liquefaction & lateral spread: URS NZ engineering reports highlighted susceptibility, especially if wetlands/lakes are excavated. - Water quality impacts: Styx River already showing zinc contamination and sedimentation. - Loss of biodiversity: Habitat fragmentation threatens native species. - Climate resilience undermined: Rezoning removes green buffers critical for flood and heat mitigation. 3. Social and Community Impacts - Traffic congestion: 800 households will generate >6,500 daily vehicle movements; modelling underestimates demand. - Pressure on infrastructure: Schools, healthcare, and recreational facilities are limited. - Loss of rural character: Current zoning requires 1000 m² lots; proposed subdivision introduces dense urban housing. - Community cohesion weakened: Rapid urbanisation risks eroding the close-knit fabric of Spencerville and Ouruhia. - Amenity loss: Increased noise, dust, lighting, and traffic will reduce quality of life. 4. Emergency Management and Evacuation Risks - Tsunami vulnerability: Site lies within tsunami hazard zone. - Brooklands route unsafe: Waimakariri River surge could cut off access. - Limited alternatives: Lower Styx Road and one-lane Spencerville bridge inadequate for mass evacuation. - Public safety compromised: Emergency services cannot manage evacuation of thousands with current infrastructure. 5. Equity and Fairness for Existing Homeowners - Pressure on unwilling sellers: Landowners who refuse to sell face rezoning that will make their large plots unaffordable. - Bullying tactics: Developers are using rezoning as leverage to force sales. - Mismatch with existing zoning: Current 1000 m² minimum lot size preserves rural character; smaller lots undermine this. - Loss of affordability: Long-standing residents penalised financially while developers profit. 6. Services and Infrastructure – Current vs Proposed - Roading & Transport: Current roads are rural-scale, unsafe, and unfit for high traffic. Proposal excludes Lower Styx Road bridge, breaching CDP rules. - Water Supply: Limited potable water; developer proposes bores and treatment plant, risking over-allocation. - Wastewater: Existing Kainga/Spencerville network lacks capacity; developer assumes pump efficiency can be restored without evidence. - Stormwater: Retention basins undersized; Styx River floodgates/pumps ignored. - Community Facilities: Proposal offers only a small commercial centre, with no medical, library, or transport provision Additional Note: The developer's own fast-track application claims that "three-waters servicing design solutions are readily available" and that rezoning "will not place any additional demand on network infrastructure." This assertion is misleading, as independent evidence shows the local water supply is insufficient, the wastewater network is already under capacity stress, and stormwater systems are highly vulnerable. 7. Ecology - Styx River corridor: Home to endangered species; no relocation or protection plan provided. - Degraded river: Boffa Miskell 2023 survey shows worsening contamination and sedimentation; development will accelerate decline. 8. Community Amenity - Urbanisation: Dwelling density will increase by 1330% in Ouruhia, destroying rural outlook. - Reverse sensitivity: Farming activities will conflict with urban residents. - Commercial area risks: No controls on permitted activities (e.g., liquor stores, vape shops). 9. Other Adverse Effects - Economic benefits overstated: Unlike the golf resort, this is a one-off build with no ongoing employment. - Radio mast hazard: 137 m transmitter at 143 Lower Styx Road poses potential health risks. - Construction impacts: Noise, dust, truck movements, fill contamination risks; no adequate mitigation plan. - Demand unproven: CCC long-term plan already identifies sufficient zoned land for 30 years. - Cultural values: Ngāi Tahu pathways and archaeological sites not properly assessed. - Contamination: Historic horticultural use raises soil contamination risks; independent testing required. - Consultation lacking: Developer controls only 63.79 ha of 170 ha proposed; community consultation minimal. 10. Fairness and Transparency of Process - Limited consultation: Unlike the earlier Golf Resort proposal, which consulted widely, the current developer has engaged minimally with the community. - Incomplete land control: The applicant controls only ~63.79 ha of the 170 ha proposed rezoned land, raising questions about how 800 houses will be achieved. - Information gaps: Reports omit key hazard data (liquefaction, tsunami evacuation, Styx River flooding) and underestimate traffic volumes. - Infrastructure assumptions: The developer's own fast-track application response claims that "three-waters servicing design solutions are readily available" and that rezoning "will not place any additional demand on network infrastructure." This statement is misleading, as independent evidence shows the local water supply is insufficient, the wastewater network is already under capacity stress, and stormwater systems are highly vulnerable. By downplaying these issues, the developer has failed to provide transparent and accurate

information to the public and Council. - Equity concerns: Some landowners feel pressured to sell, with rezoning used as leverage to increase rates and force them out. - Transparency failure: The developer has not provided clear evidence of demand, nor realistic plans for infrastructure upgrades, leaving the community uninformed and disadvantaged.

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# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Renee **Last name:** Howison

**Prefered method of contact**

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**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**
I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Opose the Private Plan Change that proposes to rezone an area from Special Purpose Golf Resort Zone and Rural Urban Fringe Zone to Residential New Neighbourhood.

**Reason for Decision Requested:**

## Specific Provisions

This is a submission on an application by LMM Investments 2012 (the applicant /the proposal) This submission relates to the section 32 evaluation of the plan change and all related documents submitted by LMM and documents prepared by the Christchurch City Council (CCC) and any other relevant documents.

## Reasons

Relevant part(s) of the application 2. This submission relates to the entire proposal Effects of the Proposal 3. The key concerns and multiple adverse effects for the environment and community as follows… 4. The site and surrounding environment 4.1 The submitters point out that the application omits including the following important points related to the site and surrounding environment when consideration is to be given to building 800 new houses in this location. 4.2 The subject land is located very close to the sea. It is 1.3km southwest of the sea and closer to the Brooklands Lagoon, the waterway which forms part of and is adjacent to the mouth of the Waimakariri river mouth. An obvious adverse effect of the proposal is putting more residential houses in close proximity to sea level rise during climate change. 4.3 A further adverse effect is that the site is located in an area suspectable to increased natural hazards identified since the Canterbury Earthquakes in 2010/12. Importantly it is located in the tsunami zone illustrated in recent Council civil public sessions with Helen Jack. www.cdemcanterbury.govt.nz/hazards/tsunamis 1 4.4 The URS New Zealand Engineering and Environmental report on geology of the specific site for the Golf Links proposal highlighted the liquefaction susceptibility of the site to lateral spread. In addition, the proposed excavation and creation of wetland and lake in the eastern section of the site may increase the likelihood of lateral spreading issues due to the reduction of lateral constraint. 4.5 The canterbury Earthquake reports on the area show this is exactly what happened. What effective design to mitigate against the potential effects of liquification and lateral spread will specifically be undertaken in this development? https://www.tandfonline.com/doi/full/10.1080/00288306.2016.118292 5. To repurpose the no longer viable golf resort outcome. 5.1 The submitters are concerned that LMM picked out the most economically viable parts of the golf resort proposal and discarded important aspects decided under that decision. In particular discarding the decision to use Lower Styx Road as the safest and most effective main entry and exit point to the site and ecological reserve. 6. Impact on roads and increased traffic movements 6.1 The submitters point out the proposal does not demonstrate how it will adequately address and better deliver the objectives and policies of the Christchurch District Plan (CDP) in relation to transport outcomes in comparison to the specific purpose Golf Resort zone. It does not assess the consistency of the rezoning against the relevant higher level planning documents to an acceptable level. This was requested by the Council in its request for further information dated 11 June 2025. 6.2 The submitters consider the LMM in its reply to this request in the letter dated 7 July 2025 to be inadequate. The reply cites that because no transport-related adverse effects were identified in its transport assessment, in appendix E, they consider the proposal to be within the strategic policy direction regarding transportation matters. 6.3 The submitters are concerned that the proposal's transport assessment does not demonstrate sufficient evidential assessment and proof that it meets many aspects of the CDP and/or relevant objectives, policies and outcomes of the following higher order planning instruments and strategies namely: • Canterbury Regional Policy Statement including the relevant transport objectives and policies in Chapter 5 and 6 • Greater Christchurch Spatial Plan • Greater Christchurch Transport Plan • Canterbury Regional Land Transport Plan 2024 2 • Ōtautahi Christchurch Future Transport 2024-54 In addition, the submitter considers there will be adverse transport related effects. Lower Styx Road access 6.4 The submitters point out that under the rules in the CDP (13.9.5.1 (a)) for the Specific Purpose (Golf Resort) Zone Whisper Creek stipulates that the accessways would involve a major entrance off Lower Styx Road, an entrance off Spencerville Road and a service road off Teapes Road with restricted access. 6.5 The submitters are concerned that in the proposal, road access is unsafe and inadequate and will have adverse effects because the proposal does not include road access off Lower Styx Road thus this breaches rule 13.9.5.1. above. 6.6 The development of the site was blocked until the intersection of Lower Styx Road and Marshlands Road was signalized, this has now occurred. This option has already been established as the main road access to the development as it is a minor arterial road in the city hierarchy road under the scheme for the required traffic volume in the Golf Resort plan. There will be a higher volume of traffic under the proposal which makes access via Lower Styx Road essential. 6.7 The submitters believe that the ecological value of the land adjacent to the Styx River and in particular the Source to Sea walkway project must not be used as a reason for not constructing the bridge across the Styx River as required under the rules for the Golf resort. It should be noted that the Styx River Source to Sea project has spasmodic adjacent access to the river edge from the source of the Styx River. This means direct river edge access is not required in this section of the river to fit in with any overall Source to Sea accessway adjacent to the river. 6.8 The submitters point out that if a walkway is planned adjacent to the river there can be a tunnel walkway under the new bridge similar to that used in other locations. 6.9 The submitters further point out that the Styx River is recognised as extremely degraded ecologically. No ecological level of significance criteria would warrant changing a transport access to an 800-housing development by excluding a bridge to facilitate access to the housing in order to preserve the ecological significance of the river or adjacent wetlands areas. 3 6.10 The submitters believe that a main access route off Lower Styx Road is essential to minimize adverse transport-related effects. Including daily congestion, increased crash risk and treacherous exit provisions in light of an urgent excavation in a Tsunami civil defense emergency. 6.11 The main access way off Lower Styx Road is essential to minimize

adverse vehicle access and wider transport-related effects. It is pointed out that Lower Styx Road is in better condition than Spencerville, Teapes and Turners roads. Especially given the proposal does not plan on upgrading these roads. 6.12 The submitters are concerned that the proposal states that there will be 720 traffic movements in the AM and PM peak traffic time which is well below the expected level given the two cars plus per household reality in Christchurch. The submitters believe 1600 car movements are a closer estimation, with a total daily movement of 6,560, (applicants' calculation). 6.13 The submitters are further concerned, that the likely high number of multiple person household rentals in the new development will further impact the number of vehicle movements. This proposal for use of the small local road network does not have the capacity to safely accommodate an 800-household increase in traffic. The local roads are in no state to accommodate that increased volume of traffic. Roads would require significant upgrades. 6.14 The submitters are also concerned that the three access roads proposed are in dangerous positions. Access will not have sufficient space to view traffic travelling from the West given its proximity to the corner on Spencerville Road. Further, the access road will compound the safety of the other roads proposed. 6.15 The Proposal's access roads onto Spencerville Road will have adverse traffic and traffic safety effects on the roading network due to the increased number of vehicles accessing the allotments off Spencerville Road. Spencerville road is a narrow local road, with limited streetlights and no footpaths, not designed for this volume of use. Spencerville road 6.16 The submitters point out this road is classified in the scheme as a collector road. It is designated as a low volume local road below the width required by the roading standards. A collector road reflects a lesser dominance of through traffic and a greater role in servicing activities along the route. There are only 14 houses along the road. 4 6.17 In places the road is not in line with its survey pegs. For example, on the corner of Turners and Spencerville roads on the north side the road is 8 metres away from the survey pegs. 6.18 The submitters point out that the rail crossing on Spencerville Road is inadequate because the approach on both sides are on an angle and the crossing is on a ridge and very rough. This is below standard for any increased volume of traffic. 6.19 The submitters point out that in addition, it is formed as a narrow rural road with 5 metres width of seal with limited shoulders and no footpaths. The bends and undulations in Spencerville Road limit site distances. There is a one-way bridge at the Spencerville end of the road with approaches that give very poor visibility of approaching traffic. 6.20 The intersection of Spencerville and Marshland's Road (Chaney's Corner) is a very dangerous intersection and is of serious concern, even more so if traffic volumes utilising this intersection increase. This is partly because of its geometry and partly because of the inadequacies of the sight line over the rail crossing on Marshland Road, a little to the south of the intersection. Therefore, Chaney's corner will require significant upgrading to the extent of traffic lights and other safety work. 6.21 The submitters point out that these safety difficulties at the intersection on Spencerville/Marshland Road currently force more traffic onto the safer Turners Road. This is reported as happening already by long-term residents of the area. 6.22 The submitters consider the proposals modelling of traffic is deficient. A proposal for such an increased volume of traffic means Spencerville Road use will increase significantly. Spencerville Road will simply not be able to safely service an 800-household increase in its present state. This will require re-alignment and widening to support and cope with this increased volume of traffic. 6.23 The submitters point out that during weekend events at Spencer Park traffic is bumper to bumper on this road. It is the main access from the north to the Councils camping ground at Spencer Park and the volume increases in the summer months. 6.23 The Proposal underestimates the increased use of the one- way bridge on Spencerville Road. Residents will use this bridge in order to access Lower Styx Road to the city. In addition, the bridge provides access to recreational areas such as Spencer Park and Bottle Lake Forest. This bridge would need to be upgraded to a two- lane bridge. 5 6.24 The submitters consider this is a totally unworkable solution for traffic access to the wider city and Canterbury region. 6.25 The submitters point out that most residents will want to take the easiest road access to the motorway to the city for work and other services. This will be via Lower Styx Road to the on ramp at Belfast Road and will be facilitated by the controlled intersection at Marshland Road. 6.26 Alternatively, the submitters point out there will be a significant increase on Marshland Road to access the city. 6.27 In addition, the lack of public transport in this area must be taken into consideration. The one bus route stopped servicing Spencerville in 2019, consequently there is no public transport in the area. 6.28 The submitters are concerned that effect of the traffic proposal will cause adverse effects such as loss of amenity, adverse environmental impacts and increased traffic volume, accidents, delays and noise. Turners Road 6.29 The road is classified in the District Scheme as a low volume local road below the width required by the roading standards. There will be a significant adverse effect from the increase in traffic movements along Turners Road. The cost of upgrading this road will be substantial for the rate payer. Transport Summary Overall, the submitters point out that the current roading network is totally inadequate and will require substantial construction work to bring up to the required standards. Therefore, the accumulative costs to the City Council and ultimately the ratepayer of upgrading all aspects of the roads and wider upgrading including the two bridges will be substantial and has not been planned for in the City Council budget. 7 Natural hazard risk and tsunamis – adverse effects 7.1 We submit that this proposal has a poorly planned transport plan which will increase the risk of citizens being able to quickly evacuate the area in face of a tsunami warning due to traffic congestion from 800 houses with insufficient road exit access. This breaches the Canterbury Regional Policy statement chapter 6. The policy explains in part that, "Poorly planned development can increase risk from natural hazards and the effects of climate change." 6 7.2 In addition, the site is located in an area suspectable to increased natural hazards identified since the Canterbury Earthquakes In 2010/12. Importantly it is located in the tsunami zone. www.cdemcanterbury.govt.nz/hazards/tsunamis `7.3 New Sea Level Research ( Marine Environment 2025 – Ministry for the Environment) The newly released Extreme Coastal flood maps for Aotearoa NZ identifies areas in the development to be likely subject to coastal flooding as well as inundation from the Styx River. The submitters suggest developing a Residential New

Neighbourhood Zone this close to the coast is unwise. 8 Three Waters – adverse effects 8.1 Potable water supply The Christchurch city council has confirmed that there is insufficient fresh water supply for this development from its network. The development proposal suggests the use of either existing bores or new ones, with an associated water treatment plant to meet the developments requirements. The submitters are concerned that the existing bores were meant to be removed following testing as part of the Golf Course proposal, which hasn't happened. Secondly this issue is in the domain of Ecan, which has over allocated fresh water supplies within the canterbury catchment, so any new development could have a negative impact on other wells nearby. 8.2 Waste Water The submitters are concerned that this development is planning to use the Kainga/Spencerville waste water network, which does not have the capacity for an additional 800 houses. The system was designed to meet the Kainga, Brooklands and Spencerville areas needs and allow for storm peak factor margins including infiltration. The Brooklands area has been red zoned which reduces the load on the network by approximately by 470 dwellings, however another approximately 50 dwellings have been added in the Kainga area which means a further 420 could be serviced theoretically. However, it has been identified that the pumping station efficiency has been markedly reduced from its original design of 40 litres per second to 29.95 litres. The model that has been proposed assumes that after so called proactive maintenance, this could recover the pump performance. There is no evidence at this stage that this is possible. The model also ignores the fact that the main line water discharge network has been significantly damaged by the earthquake and the infiltration and inflow will be much higher than what is allowed in the calculations following the earthquakes and the slumping of land levels in the existing built areas. The issue of 'surplus' capacity of the existing system would be much better used for infill housing and extensions of existing communities rather than a green fields site. 7 8.3 Stormwater The submitters are concerned about the increase and the rapidity of the storm water discharge due to the significant area of buildings and hard stand areas into the retention ponds, which in turn flow into the Spencer Drain. The basins provided appear to be too small and being placed in the flood zone means they can easily become inundated in a major event. The Spencer Drain, which is the only major discharge route is 3000 metres long, but only has a fall of half a metre of fall giving a gradient of 1/6000. This is entirely inadequate to deal with the current storm water discharge, let alone the increase in rate caused by the hard standing areas and roofs. There are two further factors which have not been considered by the applicant, which are the pumping station which is the only effective route which storm water can be disposed of into the Styx River in a storm event. These pumps have not been considered in the model provided, and neither the fact that the level of the Styx River is controlled by the flood gates at its terminus. These gates are opened and closed on tidal flows and when the Waimakariri is in flood they can remain closed, which allows the Styx River to breach the stop banks and cause extensive flooding. The submitters need to be satisfied that these are addressed prior to any approval. The flood gates need to be upgraded to mechanical control, accompanied by additional pumps. 9 Ecology – further adverse effects 9.1 Styx River Corridor The greater Styx River corridor is home to a range of endangered species, including lizards/geckos, eels, lampreys and a variety of birds. The application has no comprehensive plan for the protection of species or their relocation, including alternative foraging and nesting sites. The submitters would recommend the flood plain, which is currently grazed and is a source of faecal contamination during flood events should not be rezoned to Rural Urban Fringe but to a Conservation Zoning and be a condition of any approval if it was decided to allow the private plan change. Additionally, this would open up the site for community and ecological benefit rather than be off limits as proposed. 9.2 The Styx River is significantly degraded and the most recent survey of the river was undertaken by Boffa Miskell on behalf of the Christchurch City Council in 2023. It is interesting to note that the applicants ecological impact assessment does not reference this report, which demonstrates an ongoing deterioration in the river, with increasing levels of zinc and other metals. "Elevated zinc concentrations can reflect the urbanisation of catchments (e.g., galvanised roofing and spouting can be major sources of zinc). Best practice stormwater management techniques should be prioritised where urban development is increasing. Untreated, or poorly treated, stormwater can bring contaminants into waterways, which can be toxic to freshwater fauna. This is especially important for the Pūharakekenui / Styx River catchment where EPT taxa, including mayflies still occur." (Pūharakekenui 8 Styx River catchment, Five-yearly and annual aquatic ecology monitoring. Prepared for the Christchurch City Council by Boffa Miskell. 4 September 2023) The build up of sediment associated with urbanisation of catchments is also having a major negative impact on the river. The current methods of attempting to deal with both these issues have proved ineffective, and if this development was to proceed it would only worsen the current degradation. This silt, as shown in the report, is building up and causes invertebrate to die, leading to a collapse in the food chain. 10. Community Amenity Issues – further adverse effects 10.1 Urbanisation The submitters are concerned that this development will increase the number of houses in the Ouruhia area by 1330%. Rather than having a bucolic outlook, there will be an intensive urbanisation of homes on small sections, which is in contrast to the surrounding area, where individual sites or single houses are usually around 1000 square metres with an open environment. Census Dwellings per Square Kilometre 2023* Area Total Dwellings Area Square Kilometre Ouruhia 60 267 2.67 Dwelling per Square Kilometre 22.5 Brooklands- Spencerville 7.25 36.8 Marshlands 228 7.99 28.5 *Census data is rounded to a multiple of 3 to protect individual anonymity. Summing across categories can therefore lead to compounded errors and totals not equalling 100%. The proposal has no controls over the visual aspects of the design and construction of the homes, unlike the Golf proposal, which had strong design elements to blend into the surrounding countryside with wide open space with set backs of 50 to 100 metres from roads and surrounding properties. This proposal only has a 5-metre strip around the development, and 10 metre setbacks to buildings, which is entirely inappropriate in a rural area. Additionally, there are no lighting plans to protect the night sky with low lighting street lights. Unlike the Golf resort proposal there is only a very small increase in public access to the river and flood plain area, but no proposed improvement in the

road side swales for drainage or footpaths, which are important for residents, including school children. 10.2 Reverse effects This is primarily a rural farming area with a significant number of rural associated vehicle movements, including tractors and truck and trailer units on a daily basis. During the summer irrigation is undertaken 24/7 which 9 inevitability does result in some noise as well. With disproportionate urban development this could result in difficulties between residents and the farming community. 10.3 Commercial Area The proposal includes a commercial area, but no associated guidelines as to the activities which will be permitted. The submitters see that the hours of operation and the type of activities undertaken are directly related to the community and should not include antisocial or toxic activities. E.g. public bars, liquor store, vape shops etc. 11 Economic benefits The proposal outlines a list of supposed economic benefits for the community. The submitters would contest that as this development is only a short one-off exercise, whereas the previous golf course was an ongoing business employing a large number of people and improving the ecological and social environment for the community. This proposal places a large urban development crammed into a narrow terrace with no support structure e.g. public transport, library, medical centre or swimming pool. The submitters see that this development is negative to both the environment and local community. 12 Broadcasting transmitter and mast situated at 143 Lower Styx Road – further adverse effects The submitters are concerned that this proposal will have a very large and concentrated areas of housing close to the radio mast which is 137 metres high. It has been shown that such towers do cause potentially harmful radio frequency fields to human health. For this reason, the original consent allowed its construction as “this particular location is reasonably isolated from surrounding houses and about 700 metres from the nearest road”. The council has accepted in the past that a rural zone is appropriate for such masts. An article by respected scientist Dr. Neil Cherry, outlining the dangers associated with high radio frequencies. It was never envisaged that a high density housing development would be built so close to the aerial and should not allowed to proceed. (Health Effects in the vicinity of Radio/TV towers and mobile phone base stations. Dr Neil Cherry O.N.Z.M. Associate Professor of Environmental Health. 6th September 2002). 13. Construction -further adverse effects The submitters are concerned regarding the potential noise, dust and general nuisance to be caused by this development if it were to go ahead. There needs to be a sequence development plan with strong environmental and construction controls if the proposal is approved. We would submit, that prior to any construction or development of the facilities that the bridge over the Styx River be constructed and this be the only entrance to the development during construction. The volumes of fill required will involve 10 thousands of truck loads, which will be entirely unsuitable for the road network and be deleterious for the health and welfare of the residents. Unlike the golf course where there was only internal movement of fill. This project will require substantial fill from outside sources, which can result in contamination to the site here and ultimately the river. If the development was to be approved there needs to be frequent and independent monitoring of all materials entering the site. Hours of work need to be restricted to 7 a.m. – 6 p.m. Monday to Friday and 7 a.m. -12 noon on Saturday. 14 Demand The proposal suggests there is a high demand for development in this area, however, no evidence is provided. In fact, because of the red zoning of Brooklands and associated earthquake damage to the area there is a natural caution from potential buyers to commit to this area. The CCC has already made it clear that in its long-term plan it has identified sufficient land zoned for development for the next 30 years. Together these issues negate the submission by LMM regarding potential demand for a subdivision which has many negating factors for approval including transport, flooding and inundation, lack of infrastructure, and poor geological history. 15 Cultural values Local Ngai Tahu members have raised the issue of traditional pathway between Ngai Tuhariri Pa to the sea. As there appears to have been no significant archaeological study of the area, this needs to be completed prior to any development. We have written to Ngai Tahu regarding this matter and are awaiting their reply. 16 Contamination – further adverse effects The contamination report provided to the submitters is deficient in a number of areas. These include the fact that part of the upper terrace along Turners Road has been and is actively market gardened. Historically this farm has also produced on the lower levels horticultural crops e.g. potatoes, onions etc.. Additionally, the Boffa Miskell report (2004) identifies further potential areas of contamination not included in the applicants’ report. Further significant independent testing for contamination should be undertaken before any development. 17 Consultation There has been no broad consultation with the community. We do understand that there has been some interaction between the developer and at least some of the owners of the 4 hectare blocks which he is attempting to rezone. This is in stark contrast with the developers of the previous Special Purpose Golf Course developers who did consult quite widely with the community. 11 It should be noted that the applicant is only able to demonstrate ownership and control of 63.79 hectares of the total area of 170 hectares of the proposed rezoned land. This raises the issue of how the applicant is going to reach the 800 section threshold.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

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**Prefered method of contact**

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**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**
I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
I oppose all aspects of the application. If approved then conditions need to be set to address the concerns of all the issues raised.

**Reason for Decision Requested:**

## Specific Provisions

Traffic Noise Quality of water supply Risk of flooding Loss of green space Huge additional rates increase

## Reasons

High density traffic will affect access to my property. The road is very narrow and has a one way bridge at one end, and a rail crossing with limited visibility at Chaney's Corner. The increase in noise with the subdivision development will be intrusive along with significant dust issues. The water supply is to be from a new well, which will have a negative effect effect on surrounding wells. There is inadequate storm water provision with all storm water being put through Spencer Drain, which continues to flood with any heavy rain. This will only be worse with run off from 800 new houses. We enjoy the green space around us and feel this should be protected for all residents in the Christchurch area. We are concerned that there will be significant rate increases making it a financial burden on us and other residents.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Selena May **Last name:** Coombe

**Organisation:**

Styx Living Laboratory Trust / Lead Volunteer

**Prefered method of contact**

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**Mobile:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**

**Reason for Decision Requested:**

### Specific Provisions

In the document attached.

# Styx Living Laboratory Trust Comments on: Private Plan Change 23- Whisper Creek Residential

https://letstalk.ccc.govt.nz/PC23

Email - styxllbom@gmail.com
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Cell Phone: 0220773997

Thank you for the opportunity to make comments on the consent application above. This submission has been prepared by members of the Styx Living Laboratory Trust.

The Styx Living Laboratory Trust ("**SLLT**") is a local river care group. The Trust was officially formed in 2002 and has since encompassed a role of guardianship and advocacy for the Pūharakekenui | Styx River and the biodiversity of the surrounding land as a living part of the Canterbury landscape.

We, the trustees and volunteers, are advocates for maintaining water quality and other values (including drainage, ecology, landscape, culture, recreation, and heritage values) in the river. We care deeply about our water and want it to remain clean, healthy, biodiverse, and available for future generations to use and enjoy.

We would like to formally comment on *Private Plan Change 23- Whisper Creek Residential*, as it affects all the values of the Pūharakekenui that the Trust advocates for.

Our comments are as follows:

The Trust recognises that urban development in the catchment brings both opportunities and challenges for the long-term health of the Pūharakekenui. We appreciate efforts from the developer to incorporate enhancements to the riparian environment into their plan, and hope that with proper management, these spaces can help the Pūharakekenui flourish for both nature and the human population.

Specifically, the Trust *strongly supports* the proposal including:

1) An extensive margin zone alongside the Styx river, increasing the likelihood of a restored river corridor along a much greater length of the lower Pūharakekenui.

2) Urban parks and stormwater management along the existing drain through the area. Enhancing waterways beyond the main river greatly increases the ecological value of the river system at the broader catchment level, especially as this area is currently in a pasture environment.

3) The planned pedestrian and cycle link beside the river, which will open up a much greater area of river for recreation and appreciation, and brings us closer toward a true Source to Sea Experience along the length of the Pūharakekenui as envisaged as a key outcome in *Christchurch City Council's The Styx: Vision 2000-2040.*

These are forward-thinking and responsible development inclusions that if managed well with a focus on building native vegetation that can sustain ecological communities could greatly increase the environmental health and value of the area.

However, the Trust also notes the permanent nature of this development, which requires strong environmental responsibility from the developers to get good outcomes, and the large temporal and spatial scale of the works themselves, which increases the risks of disruption during the development process. Aspects of the development plan remain light on specific details of how this development will be conducted in an environmentally responsible manner, which we hope the developers can flesh out.

***The Trust is prepared to support this plan, provided that the following considerations are satisfactorily addressed:***

## 1. Partnership Opportunities

### 1.1 Restoration Work

The Trust acknowledges the developer's intentions to support the health of the Puharakekenui | Styx catchment during and after the proposed development plans are undertaken. Further to this, the Trust welcomes a formalised partnership between the developers and the Trust. The experience of the Styx Living Laboratory Team with riparian restoration and long-term understanding of the Puharakekenui | Styx catchment, would support the developer's and Trust's mutual intentions to support and improve the surrounding environment.

### 1.2 Flood Management

The Trust notes that the open recreation space between the residential allotments and proposed esplanade reserve is part of the Puharakekenui | Styx floodplain. As such, its ephemeral flooding makes it sub-optimal for its current cattle grazing or consistent recreation use, while making it valuable habitat for seasonal native waders (stilts, pūkeko, oystercatchers and herons etc.).

The Trust suggests a further partnership opportunity to make effective usage of this land. The Trust would welcome conversations with the developer about the potential for the Trust to lease this land, with any revenue the Trust generates from (e.g. being directly reinvested into restoring that section of the riparian corridor).

A partnership such as this would:

- Allow more economical restoration of the riparian corridor, improving the health and appearance of the Puharakekenui/Styx River.

- Prevent a surplus land management issue for the developer.
- Mitigate land and property damages from flooding.
- Utilise a floodplain-appropriate grazing regime as a conservation management tool.
- Provide the Trust and Lincoln University with potential large-scale land management research opportunities.

# 2. Flora and Fauna

## 2.1 Birds

The Trust is concerned with the lack of information provided on management strategies to protect bird populations within the Styx catchment. Avian diversity is widely recognised as a key indicator of environmental health, with particular emphasis on the kōtare (kingfisher), whose presence signals the vitality of local waterways and riverbank stability. The kōtare, featured in the Trust's logo, holds special significance for the organisation. The Trust is concerned regarding potential threats posed by development activities, including noise, vibration, and habitat loss resulting from earthworks. Such disruptions have the potential to affect sensitive species like the kōtare, leading to stress, disrupted feeding or potential lack of feeding sources, and the abandonment of nesting sites. The Trust would like to see a robust avian management plan developed to address these concerns.

Further, the Trust notes the lack of acknowledgement of the ecological and cultural value of intermittent wetlands for indigenous waterbirds, waders, and tangata whenua. The proposal deems their ecological value to be negligible due their grazed paddock locations and vegetation species. However, wetlands are considered taonga, and provide optimal habitat for New Zealand endemic species. Therefore, as the identified wetland area fluctuates in size through the year, it is recommended that more attention is paid to its wider ecological value, cultural value, and potential to meet the Sites for Ecological Significance criteria (Canterbury Regional Policy Statement).

### 2.1.1 Mitigation strategies

The Trust suggests:

- Implementing an avian management plan during earthworks and construction.
- Monitoring bird behaviour before, during, and after earthworks and construction, and reporting any concerns of stress to the Trust.
- Avoiding earthworks in peak breeding season from September to January to limit stress and chick loss.
- Monitoring prior to beginning earthworks of the ephemeral wetland, noting its fluctuations in size and area coverage to inform decision-making on nearby developments.

- The implementation of an indigenous avian management plan to support species into the future, in alignment with regional biodiversity guidelines.
- Determining whether the identified wetland area meets the Sites of Ecological Significance criteria at any point during the year.

## 2.2 Fish

The Trust wishes to express its concern about the potential negative effects associated with earthwork activities, such as noise, vibration, and increased total suspended solids (TSS) in the waterways. These factors have the potential to stress or otherwise adversely affect the wellbeing and behaviour of fish populations in the area, specifically those residing in and around the Styx River. For example, the common galaxias (*Galaxias maculatus*) are sensitive to heightened sediment and are an endangered species that we need to protect.

### 2.2.1 Mitigation Strategies

The Trust suggests:

- Introducing sediment traps to minimise sediment entering the Styx River.
- Monitoring the behaviour of fish before, during, and after the earthworks to identify adverse effects earthwork activities might have on the fish population.
- Introducing **habitat refugia or artificial habitat features** within the stream channel and along banks, in order to support and enhance the fish populations.

## 2.3 Lizards

The Trust expresses concern regarding the lack of information and assurance that the lizard populations will not be affected by the construction of the residential area. The Ecology Report (Appendix G) highlights records of lizard presence within and near the site. Of particular concern is the Southern Grass Skink, which is classified as a declining species. In light of this, the Trust requests active involvement in any processes related to the capture and relocation of lizards from the site.

### 2.3.1 Mitigation Strategies

The Trust suggests:

- Development of a Lizard Management Plan that includes the capture and relocation of indigenous lizards found within the site, in accordance with the requirements of the Wildlife Act 1953, ensuring legal and ethical standards are upheld.
- Monitoring the lizards post-transfer to assess the success of relocation.

## 2.4 Invertebrates

EPT (Ephemeroptera, Plecoptera, Trichoptera) species and Freshwater crayfish (Kōura) are commonly used to determine stream health and water quality in Aotearoa. They are often the first organisms to leave an environment when conditions decline, giving a great indicator of stream health. The EPT and other invertebrate species are sensitive to artificial light, leading to exhaustion, increased predation, and reduced mating success. The Trust is concerned that the light during works and permanent street lights may have an impact on invertebrate health, in effect, degrade the ecosystem of the Styx River and surrounding wetlands and drains. High sedimentation will also negatively impact invertebrates as increased sediment cover reduces the ability to support freshwater invertebrate habitat.

### 2.4.1 Mitigation Strategies

The Trust suggests:

- Installing street lights with lower blue light, targeted lighting, or motion-activated near the stream.
- Targeted lighting during construction work from 10 pm to 6 am.
- A proactive approach to stream degradation by monitoring changes to the EPT species.

## 2.5 Riparian Margin

The Trust supports the proposed changes to the riparian margin, including the introduction of suitable species to stabilise the river bank and provide habitats and shade for birds, fish, and invertebrates. Furthermore, the Trust notes and supports the recommendation to establish a 5 metre wide native landscape strip around the boundaries of the site, retaining existing established planting wherever possible. These approaches will enhance ecological connectivity and preserve mature vegetation, contributing to the overall health and resilience of the river environment.

### 2.5.1 Mitigation Strategies

The Trust suggests:

- Collaborating with Council ecologists to find native vegetation that benefit the area, taking into account local conditions and existing ecosystems.
- Selecting planted species that will provide flowers and fruit for native birds and insects to feed on, which will help increase animal biodiversity in the area.
- If you wish, the Trust can assist with the layout and planting of these proposed plans.
- Coordinate with broader restoration initiatives along the Styx River. The Trust is committed to working collaboratively, and together we can develop opportunities to integrate site-specific enhancements with larger, ongoing restoration projects and recreational activities along the river corridor.

# 3. Contaminated Land

## 3.1 Soil Contaminants

The Trust notes the likely presence of contaminants, including heavy metals, organochlorine pesticides, organonitrogen pesticides, organophosphorus pesticides, polycyclic aromatic hydrocarbons, petroleum hydrocarbons, and asbestos from the HAIL activities that have occurred on-site. The Trust acknowledges and agrees with the removal of the contaminated land from the site with its relocation, and plans for dust, erosion, and sediment management to prevent contaminant mobilisation during earthworks and transportation. It is noted that the discharge of stormwater will enter the Styx River via farm drains, allowed under consent CRC231955. The Trust is concerned about the potential for further contaminant transfer to the river during and after site works. Accordingly, the Trust seeks to be updated on stormwater management initiatives and to collaborate on strategies that minimise risks to the Styx River. We emphasise the need for proactive engagement to ensure that all parties are informed and able to contribute to the ongoing protection of the waterway.

### 3.2.1 Mitigation Strategies

The Trust suggests:

- The implementation of a monitoring programme to track levels of key contaminants (noted in Appendix 8- Ecology) in the Styx River and other at-risk waterbodies.
- Monitoring for TSS (total suspended solids) and reporting elevated levels to the Trust. This will enable timely identification of potential issues and the implementation of corrective actions as required.

# 4. Transport

## 4.1 Traffic Management

The Trust has reviewed Figure 8 of the Transport- Appendix E, which presents the projected traffic generation for the proposed 800 dwelling development. The estimate of 6,560 vehicles per day is notably higher than the baseline, leading to concern from the Trust regarding the potential increases in road noise and overall effectiveness of traffic management for the proposed site. Increased vehicle movements, noise, and vibration can adversely affect species known to inhabit the nearby wetlands and riparian zones of the Styx River.

### 4.1.1 Mitigation Strategies

The Trust suggests:

- Reducing the speed along the Lower Styx Road to minimise road noise and decrease the likelihood of vehicles coming into contact with local wildlife.
- Installation of signage for birds, such as Bittern, known to reside in nearby wetlands. For example:

### 3.2 Source to Sea Route

The Trust encourages the establishment of recreation connections along the Styx River as envisaged in the Christchurch City Council's catchment plan for the Styx River; *The Styx: Vision 2000-2040*. Such connections would complete existing gaps in the Source to Sea route, link the Styx Loop Conservation Park, and create a direct path to Bottle Lake Forest, supporting opportunities for recreational cycling and enhancing connectivity with the area. By promoting recreational activities such as cycling and walking, the Trust can enhance public awareness of the Styx catchment and foster a greater appreciation for the unique ecology and biodiversity of the area. These activities not only encourage healthy lifestyles but also provide opportunities for the community to connect with and learn about the local environment.

## 5. Development Plan

### 5.1 Fencing

The Trust supports and agrees with the 'Proposed Rural Interface' plans for the installation of post-and-rail and post-and-wire fencing around the boundaries. These fencing measures are considered effective in reducing the risk of dogs entering sensitive areas and interacting with, or disrupting the habitats of local wildlife.

### 5.1.1 Mitigation Strategies

The Trust suggests:

- Installing clear signage at all entry points and along boundaries stating "dogs must be kept on leash at all times". This will help ensure compliance from dog owners and reduce the likelihood of dogs straying into wildlife areas.

Thank you for the opportunity to provide comments on the Whisper Creek Residential Development Plan. SLLT would welcome the opportunity to present our submission and provide further detail and comments.

Ngā mihi nui,

Selena Coombe

Email - selena_coombe@hotmail.com
Cell Phone: 0272566863

STYX LIVING LABORATORY TRUST
PŪHARAKEKENUI

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Craig **Last name:** Wakelin

**Prefered method of contact**

**Postal address:** 285 Spencerville Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** cacontracting.chch@gmail.com

**Daytime Phone:** 0274783104

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
The subdivision have less houses and be more in keeping with the rural area No additional stormwater to be put into the Spencer Drain or Styx River

**Reason for Decision Requested:**

## Specific Provisions

Stormwater - discharge into the Spencer Drain Roading - roads are rural roads and can't handle increased traffic flow from a subdivision Lighting - visual pollution in a rural community

## Reasons

There adverse effects on my property and lifestyle

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Alexander **Last name:** Smirnoff

**Prefered method of contact**

**Postal address:** 33 Seabrooke Dr, Spencerville, Christchurch, New Zealand, 8083

**Email:** caconstruction33@gmail.com

**Daytime Phone:** 021 1144 731

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
The Spencerville Residents Association Committee have decided to put in a submission against the application based on the following: - Increased flooding risk to Spencerville - Increased danger for all residents during Tsunami evacuation - The effect the subdivision will have on the water quality of the Stix River - Huge additional costs to ratepayers to upgrade local roads and bridges.

**Reason for Decision Requested:**

### Specific Provisions

The typography of the land means current use (as farmland) should continue.

### Reasons

The land is a flood ponding and management area under the District plan. This could cause serious issues for the area given the land changes due to the earthquakes. There are potentially significant effects on the Stix river catchment in terms of amenity and flooding. There must be access to lower Stix Road as 6.500 traffic movements per day will cause huge congestion if limited to only Turners and Spencerville Road.

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# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** David **Last name:** Parker

**Prefered method of contact**

**Postal address:** 35 heyders rd, Christchurch, Christchurch, New Zealand, 8083

**Email:** daveparker.010@gmail.com

**Daytime Phone:** 0272324108

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
I want this to be taken off the table and would be happy to fight it in court to stop this moving forward. Along with every one else in our community that I have spoken with I strongly oppose all aspects.

**Reason for Decision Requested:**

## Specific Provisions

All provisions I highly oppose this plan

## Reasons

This will ruin the community in spencerville It will increase flood risk to spencerville as the styx river floods in the area proposed. There will be increased traffic on our narrow rural roads Huge additional cost to rate payers to upgrade all roads We will lose the green space that surrounds us, it is a wildlife haven for fesants,pukeko and other birds Its one of the last remaining rural areas close to the city The proposed plans will considerably effect the water quality of the styx river Its a great place that alot of christchurch come because of the green nature.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Marcus Bryan **Last name:** Stewart

**Prefered method of contact**

**Postal address:** 62B Turners Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** mbs4now@icloud.com

**Daytime Phone:** 021839486

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
B) > ABILITY TO RIDE A HORSE SAFETY IN RURAL URBAN FRINGE ZONE Add/create a safe, allocated and sign posted specific horse riding route along Turners Road ‘to and from’ Chaneys Plantation.

**Reason for Decision Requested:**

## Specific Provisions

A) > RATES B) > ABILITY TO RIDE A HORSE SAFETY IN RURAL URBAN FRINGE ZONE On LMM Investments 2012 Ltd NOVO (including) paragraph 71 page 25 C) > VEHICLE TRAFFIC The vehicle traffic created from Private Plan Change 23 Whisper Creek; with projected [modelled in QTP 4.2.1 Trip generation assumptions] LMM Investments 2012 Ltd NOVO Group [page 15 Table 7: Baseline Traffic Generation] LMM Investments 2012 Ltd NOVO Group [page 17 Table 8: Traffic Generation Rates & Resultant Traffic Generation] LMM Investments 2012 Ltd NOVO Group [66 on page 25] D) > SEWAGE PROCESSING

## Reasons

As the owner of a 4.0478 Hectares property designated as a Lifestyle Block; at 62B Turners Road; for 22 years, that has been informed of this Private Plan Change 23 Whisper Creek; further up Turners Road (was called Semi-Rural) that is at this time is Rated at Rural Urban Fringe Zone. A) > RATES Since 2010 my Rates Invoiced has increased from $3,876.94 to $7,261.19 annually. Nearly doubled in 15 years. With Private Plan Change 23 Whisper Creek; to Residential New Neighbourhood Zone the local Rates changes will impact significantly me and other Local Property Owners. Rates will increase and therefore the ability to pay the further rates and therefore my / our ability to live in our homes. Without gaining any significant improvements or services provided to me; or current Ouruhia residents. B) > ABILITY TO RIDE A HORSE SAFETY IN RURAL URBAN FRINGE ZONE Living within Semi-Rural; Rural Urban Fringe Zone, provides me and my grazers the ability and choice to ride our horses from my address (near the Ouruhia School) to Chaney Plantation; and return safely. There is ‘no’ inclusion or mention in the proposal of this ability to ride a horse safely in Rural Urban Fringe Zone to local Chaneys Plantation horse riding paths; as can and does exist at the present time with Turners Road Rural Urban Fringe Zone. There are many owners and grazers of horses in Ouruhia and locally, yet there has been no inclusion for us and our horses to ride locally safely in the proposed Private Plan Change 23 Whisper Creek. On LMM Investments 2012 Ltd NOVO Group (including) paragraph 71 page 25 which has overwritten any ability to safely ride a horse to Chaneys Plantation as it focuses on the proposed Whisper Creek residents and their desire to walk (pedestrian) and bike (cycle) links; whilst removing my ability to ride my horse safely to the forest riding paths; or go riding with a friend within the local neighbourhood. I believe safety of local horse riders and therefore a significant amount of local residents and their friends have been overlooked and in the future will be pressured out of our residences by this proposal that endangers those wanting to ride horses locally by the volumes of vehicle traffic created by the proposed Private Plan Change 23 Whisper Creek. C) > VEHICLE TRAFFIC The vehicle traffic created from Private Plan Change 23 Whisper Creek; with projected [modelled in QTP 4.2.1 Trip generation assumptions] > TOTAL DAILY TRIPS 1820 [620 ‘to and from’ Golf Resort and 1400 ‘to and from’ 800 Dwellings]. This is then increased to 2168 distributions of trips; as detailed [in table 5.1.3] traffic/trips ‘to and from’ Turners W of Teapes. With trip distribution information has not been summarised for the golf Resort scenario, paragraph 5.1.7 On LMM Investments 2012 Ltd NOVO Group [page 15 Table 7: Baseline Traffic Generation] a Daily Traffic figure for golf academy of 3,679 vehicles is stated [double counting with existing zoning]. On LMM Investments 2012 Ltd NOVO Group [page 17 Table 8: Traffic Generation Rates & Resultant Traffic Generation] a Daily Traffic figure for 800 dwellings of 6,560 vehicles Daily is stated. This is a total of 10,239 vehicles daily, without commercial and community area being included in the calculation. With 70% being determined by the CAST model to be going past my address on Turners Road, west of Teapes Road; which is an additional 7,167 vehicles a day. This tells me the CAST model predicts that between 7,167 and 10.239 vehicles/trips will be impacting me; and the Ouruhia Community; and the present Ouruhia School daily (which from reading this Proposal is ‘not’ the proposed Ouruhia Model School. As from a Facebook search the present Ouruhia School has 29 pupils at present; whilst looking for more students to fill their present site capacity. They will not have the capacity to include the future Families with Primary year 1 - 8 school children of the proposed 800 family dwellings). Wider Network Transport Effects [paragraph 61 page 22] that peak hour traffic generation will be 720 vehicles per hour. This is a difference of 348 trips a day. There is a wide range of vehicle traffic number differences the proposal is based or biased on. With the Turners Road to Marshland Road intersection not being changed until (stated) 700 Residential houses being completed. As per this proposal. On LMM Investments 2012 Ltd NOVO Group [66 on page 25] this intersection upgrade would need to occur prior to 701 dwellings being constructed. This is a huge difference in the amount of increased vehicle flow from now till 700 dwellings being constructed without upgrading the intersection which the previous accident data does not account for; or include horse riding safety in Ouruhia Rural Urban Fringe Zone. D) > SEWAGE PROCESSING Private Plan Change 23 Whisper Creek > Sewage processing proposal to be processed in Spenciville during a daily quantity has been stated that is within the Spencerville capacity; does this take into account the increased quantity of sewage required to be pumped and processed during a televised International All Blacks game of rugby at half-time and full-time toilet flushes? Or will this create a surge blockage and negate the Private Plan Change 23 Whisper Creek ability to function as stated without any future issues of capacity when the supporting televised sport residents relieve themselves and flush at similar times.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Lee Paul **Last name:** Bennett

**Organisation:** Residents of 38 Turners Road

**Prefered method of contact**

**Postal address:** 38 Turners Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** rb30dett@gmail.com

**Daytime Phone:** 0220945965

**Mobile:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Decline the changes proposed for the current Resource Consent.

**Reason for Decision Requested:**

### Specific Provisions

This submission relates to the entire proposal

### Reasons

# Assessment and Recommendations Regarding the Satellite Suburb Proposal

## Concerns with the Current Whisper Creek Satellite Suburb Proposal

The proposed RNN- "Residential New Neighbourhood", satellite suburb at Whisper Creek is located in a distinctly rural lifestyle setting and poses several significant concerns relating to its density, design, and location. One of the primary issues is the suburb's considerable distance from essential amenities—supermarkets are approximately 6 kilometres away, and high schools are about 10 kilometres distant. The limited commercial allotment included in the plan is insufficient to support the day-to-day shopping and commercial needs of a development of this size.

A major concern is the potential negative impact on the existing Ouruhia village and school area, which is situated over 2 kilometres away. The forecasted demand generated by this development would result in more than 6,000 daily vehicle movements, most of which would traverse Turner's Road. The proposed alternate routes are not as direct to the city via SH74/Marshlands Road, and this would overwhelm both the small rural school and the village.

The commercial and economic assessment for Whisper Creek underscores its remoteness from Christchurch, noting that most residents would be almost entirely dependent on personal vehicles for daily activities outside the subdivision. This reliance should be emphasised, as the vehicle movement estimates provided—based on 800 completed homes—appear to be significantly underestimated. Increased reliance on vehicles would further contribute to Christchurch's already high vehicle emissions, which currently sit at 54%, and no alternative public transport options have been proposed for the site.

Developers have claimed that a 150-section semi-rural golf resort is uneconomic. However, if this is truly the case, it would be more appropriate to sell the land to a developer specialising in golf resorts and high-end, luxury, larger-lot lifestyles. Government policy changes, such as the introduction of the "Active Investor Plus" scheme, have opened new opportunities for investment, making it possible to finance and complete the original golf resort. The 150 lots would likely be highly desirable in the current market, especially given the hospitality and accommodation demand with the stadium opening soon. This would create more ongoing employment for Christchurch rather than this proposed smash and grab development.

The developers' argument regarding economic viability appears out of step with both national and local government changes and evolving investment and housing density trends.

The shift from a golf resort to an 800-lot RNN subdivision at Whisper Creek appears motivated by the pursuit of short-term profit, with little evidence of substantial benefits for Christchurch. Similar RNN developments—often described as "cookie cutter, spec-homed, postage stamp" subdivisions—should remain within the current CCC Greenfield zones, where significant undeveloped land is still available. For example, 25 hectares between SH74 and Hills Road offer more convenient access to the city. The proposed development would also compete economically with recent city zoning changes, such as the Housing & Business Choice Plan PC14, which with 30years of zone changes intensifies already established commercial hubs in Christchurch with the potential of 65,000 extra dwellings. These Recent changes confirmed in September make WC's Economic plan released obsolete.

Permitting intensive allotment sizes of 250–600 $m^2$ in a location so remote from urban centres, motorways, or public transport is unwise. Demand for these small, isolated sections is likely to diminish, potentially resulting in a stagnant, incomplete, and unsightly development over many years—a risk highlighted by the protracted completion of the Pegasus development, which only succeeded after a decade and a major natural disaster.

Turner's Road, currently a quiet local road, would require significant upgrades if the subdivision were to proceed. This includes reclassifying Turner's and Spencerville Roads as minor arterial roads, widening them beyond the proposed 6 metres, adding cycleways, and installing traffic lights at the Marshlands Road intersection. These infrastructure upgrades should be completed during the first stage of development and funded upfront. Additionally, heavy and trade vehicle traffic should be redirected away from the Ouruhia suburb and school during all stages of construction.

From an environmental perspective, the rural area northeast of Christchurch should be preserved as semi-rural to prevent increased noise and light pollution. Consideration should also be given to designating the area as a dark sky reserve to further protect its night sky & rural character.

Importantly, the proposed RNN site does not fall within any existing CCC greenfield development zone along the motorway corridor and fails to maintain a semi-rural character.

## Compromise Solution for Whisper Creek

A more balanced approach to the development would be to amend the existing 150-lot golf resort design by introducing larger, semi-rural allotments, effectively utilising the

fairways. This modification would reduce pressure on Turner's Road and the Ouruhia intersection, while maintaining the rural character of the area. There is also an opportunity to extend this semi-rural approach towards Ouruhia Village.

## Alternative Zoning Suggestion: Ouruhia Semi-Rural Rezone

There is clear, region-wide market interest in larger plots (ranging from 2,000 to 10,000 $m^2$), with buyers willing to pay a premium for such properties. After years of zoning neglect, the Ouruhia suburb would benefit from being developed as a semi-rural village, encompassing the school, Everglades Golf Course, and the Turner's/Marshlands intersection. The area already contains numerous small, historical (but now non-compliant) rural properties, and restrictive Resource Management Act (RMA) rules and urban fringe zoning have exacerbated these challenges since 1992.

Opportunities exist to expand Ouruhia village by converting the urban fringe into a semi-rural/large-lot residential zone, the Council could reduce the minimum lot size in the Urban Fringe Rural zone from 10 acres to a more practical lifestyle size of 2.5 acres (1 hectare) or adopt alternative semi-rural zoning models from neighbouring districts. This would foster a genuine community atmosphere, especially if accompanied by Neighbourhood centre zone community village rezoning at the Marshlands/Turners corners. Improved access to public transport, such as bus stops along Marshlands Road, would also become more feasible.

Similar semi-rural zoning approaches have proven successful in neighbouring districts. Waimakariri District Council, for example, has completed several rural villages—including Mandeville, Ohoka, and Woodend—while Selwyn District has also demonstrated success with this model.

The local school, which is currently facing critically low enrolment numbers, would benefit from a steady influx of families within a village environment, without being overwhelmed by hundreds of new student and vehicle commuters from a distant, high-density development. The proposed 800 homes at Whisper Creek would quickly exceed the small school's capacity.

The Waimakariri District Council's Large Lot Residential Zone (LLRZ) model features a high-quality, low-density residential environment with distinct character. Key features include:

- Average allotment size of 5,000 $m^2$ with a 20% site coverage allowance
- Minimal earthwork requirements, relying on site-specific geotechnical and foundation designs
- No curb and channelling requirements, with stormwater managed via swales
- Shared water wells, drip-feed 2000L/day systems for fire and water tanks, and advanced site-specific rural wastewater systems

- Low levels of noise, traffic, outdoor lighting, odour, and dust

This model encourages the construction of larger, architecturally significant homes, enhancing Christchurch's wealth and development without overburdening existing infrastructure. Expanding this semi-rural approach could transform the northeast of the city, maintain its rural identity while attracting high-end residential design. Adopting a zoning approach similar to the Waimakariri District would also allow Christchurch to leverage its proximity to the International Airport and compete with Central Otago for high-end architecture and quality of life, possibly including a local dark sky reserve.

## Summary

The future of Christchurch should not be defined by remote RNN urban sprawl. Instead, a balanced, semi-rural approach is both desirable and necessary to preserve the rural character of Ouruhia village and the northeast region. The projected 6,000+ vehicle movements per day through the Ouruhia suburb and school are unacceptable in a rural environment.

Recent national and local government 30years of zone changes in housing intensity have rendered the 800-lot RNN proposal uneconomical and risky, as it would compete directly with new zoning changes and slow their intended expansion. The Whisper Creek development risks repeating the mistakes of the Pegasus project—potentially resulting in stalled stages, inadequate infrastructure, and a negative impact on surrounding property values, which could, in turn, lead to legal challenges against the developer, its beneficiaries, or the Christchurch City Council. Ultimately, the risk to the community and local environment is too great, and such a development should not be approved.

The Residents: Lee, Petra, Tristan, Julie, Richard Bennett

38 Turners Road, Ouruhia

Christchurch.

Ph. 022 094 5965

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Angela **Last name:**

**Prefered method of contact**

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**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
This development does not meet zoning requirements, lacks infrastructure, threatens the environment, and undermines the rural character of Ouruhia that we have come to love and admire. We respectfully ask the Council to decline this proposal.

**Reason for Decision Requested:**

## Specific Provisions

My submission relates to the entire plan change.

## Reasons

We are writing to oppose the proposed residential development in Ouruhia by Nova Group Limited. We believe this development is unsuitable for our area and will negatively impact the environment, infrastructure, and community character. My family and I have lived in the area for over 2o years and we have happily raised our three children here. They attended local pre-schools, the local Ouruhia Primary School (which we fought to keep open following Ministry suggestions to close) and they have become attuned to the area preferring rural pastimes, such as horse riding, chicken rearing and calf raising. Growing their own fruits and vegetables and generally thriving in the rural setting. This was a conscious decision for us as a desirable place to raise our family and we all continue to enjoy the area all year round. Our concerns about this plan are outlined below: 1. Zoning and Housing Supply The Christchurch City Council has identified suitable land to meet housing demand for the next 30 years without the need for developing to this extent in Ouruhia. This proposal does not align with the District Plan, which requires new developments to be connected to existing urban areas and supported by infrastructure like water, sewage, and public transport. None of these are present in Ouruhia at this time. Furthermore, the development plans to increase the number of houses in our area by what we consider to be an enormous quantity (we understand more houses than what were initially planned for the Whisper Creek Golf Resort). The setting of this particular area does not lend itself well to a setting for relatively high density housing to this planned level. Ouruhia is a lovely quiet rural area, loved for its green fields, spacious properties and rural activities for those who enjoy the lifestyle that comes with country living. This proposal threatens that peaceful environment. It lacks footpaths, safe cycling routes, adequate building setbacks, and lighting controls. Construction noise and dust will be extremely disruptive to this peaceful setting upsetting not only the residents but also stock such as cattle, horses, goats and pigs. We all enjoy the country setting and would certainly not enjoy seeing hundreds of metres of residential fencing blocking the open views, which would be set right against the roadside with minimal setbacks. We have lived in the area for 20 years and always owned horses which we love to ride along the wide road verges knowing the only interruption to our horses would be the cattle that come across to say hello. What would this development do for our enjoyment of quiet road riding. Riding to the forest in order to exercise our horses in the forest tracks? I shudder to imagine the noises coming from the 800 properties, 800 vehicle owners and all that comes with that. 2. Appropriate Roading and Safety Turners Road is a local road designed for up to 650 vehicles per day, this is set to rise to over 6,000 vehicles per day. The road is a quiet rural road and certainly not designed for this level of traffic. The verges are plentiful with potholes. When a local horse owner drives their horse float and horse truck along the road, the opposing traffic must slow down and take care often slipping off the side of the road onto the verge. We can only imagine the incidents and accidents awaiting to happen. The development will require hundreds of trucks and loads and machinery to be transported and we already hear the house shaking with large trucks which is rather traumatic post earthquake for the family. This development will worsen pollution, especially during construction, which has a high risk of causing damage to the Styx River where our children love to swim and play in the summer. They enjoy helping out at the annual river clean up and Spencerville Duck Race where they volunteer as members of the Surf Lifesaving Club. We have concerns for water run off, flood plains and the local aquatic life that enjoy it here too, many many locals whitebait in the local river. The proposed site includes flood-prone land. Installing this level of urban density in a rural area is both unsafe and unsuitable. We also understand that the current water infrastructure cannot support this development. The taking of water from underground aquifers will further lower the water table for local residents. The Kainga/Spencerville sewage system lacks capacity for 800 more homes. 3. Lack of Community Benefit The Golf Resort at least included reserves and public access. This proposal offers very little for our community, rather it's a big subdivision more suited to the city, placed in the middle of our peaceful rural environment. These concerns must be considered in conjunction with developing the area to provide enjoyment and peace for everyone including those who have lived in and chose this area for it's peaceful safe and quiet locaiton.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Caitlin **Last name:** Elkington

**Prefered method of contact**

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**Daytime Phone:** 0273339819

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Private Plan Change 23 poses unacceptable risks to environmental safety, community wellbeing, emergency management, equity for existing homeowners, and infrastructure capacity. The developer's proposed services are substandard, unsafe, and unrealistic, and the process has not been fair or transparent, failing to properly consult, disclose, or address critical issues. For these reasons I would like the council to reject the proposed private plan change.

**Reason for Decision Requested:**

## Specific Provisions

1. Current Zoning vs Proposed Rezoning 2. Environmental Concerns 3. Social and Community Impacts 4. Emergency Management and Evacuation Risks 5. Equity and Fairness for Existing Homeowners 6. Services and Infrastructure – Current vs Proposed 7. Ecology 8. Community Amenity 9. Other Adverse Effects 10. Fairness and Transparency of Process

## Reasons

1. Current Zoning vs Proposed Rezoning The site is currently zoned Special Purpose (Golf Resort) and Rural Urban Fringe, reflecting hazard avoidance, ecological sensitivity, and rural character. The proposal seeks rezoning to Residential New Neighbourhood, enabling up to 800 houses and a commercial centre. This rezoning contradicts the Christchurch District Plan, undermines strategic planning, and sets a precedent for urban sprawl into hazard-prone rural land. 2. Environmental Concerns Flood risk: Adjacent to Styx River, within High Flood Management Area. Sea level rise & tsunami risk: Only 1.3 km from the coast and Brooklands Lagoon; vulnerable to climate change. Liquefaction & lateral spread: URS NZ engineering reports highlighted susceptibility, especially if wetlands/lakes are excavated. Water quality impacts: Styx River already showing zinc contamination and sedimentation. Loss of biodiversity: Habitat fragmentation threatens native species. Climate resilience undermined: Rezoning removes green buffers critical for flood and heat mitigation.\ 3. Social and Community Impacts Traffic congestion: 800 households will generate >6,500 daily vehicle movements; modelling underestimates demand. Pressure on infrastructure: Schools, healthcare, and recreational facilities are limited. Loss of rural character: Current zoning requires 1000 m² lots; proposed subdivision introduces dense urban housing. Community cohesion weakened: Rapid urbanisation risks eroding the close-knit fabric of Spencerville and Ouruhia. Amenity loss: Increased noise, dust, lighting, and traffic will reduce quality of life. 4. Emergency Management and Evacuation Risks Tsunami vulnerability: Site lies within tsunami hazard zone. Brooklands route unsafe: Waimakariri River surge could cut off access. Limited alternatives: Lower Styx Road and one-lane Spencerville bridge inadequate for mass evacuation. Public safety compromised: Emergency services cannot manage evacuation of thousands with current infrastructure. 5. Equity and Fairness for Existing Homeowners Pressure on unwilling sellers: Landowners who refuse to sell face rezoning that will make their large plots unaffordable. Bullying tactics: Developers are using rezoning as leverage to force sales. Mismatch with existing zoning: Current 1000 m² minimum lot size preserves rural character; smaller lots undermine this. Loss of affordability: Long-standing residents penalised financially while developers profit. 6. Services and Infrastructure – Current vs Proposed Roading & Transport: Current roads are rural-scale, unsafe, and unfit for high traffic. Proposal excludes Lower Styx Road bridge, breaching CDP rules. Water Supply: Limited potable water; developer proposes bores and treatment plant, risking over-allocation. Wastewater: Existing Kainga/Spencerville network lacks capacity; developer assumes pump efficiency can be restored without evidence. Stormwater: Retention basins undersized; Styx River floodgates/pumps ignored. Community Facilities: Proposal offers only a small commercial centre, with no medical, library, or transport provision. Additional Note: The developer's own fast-track application claims that "three-waters servicing design solutions are readily available" and that rezoning "will not place any additional demand on network infrastructure." This assertion is misleading, as independent evidence shows the local water supply is insufficient, the wastewater network is already under capacity stress, and stormwater systems are highly vulnerable. 7. Ecology Styx River corridor: Home to endangered species; no relocation or protection plan provided. Degraded river: Boffa Miskell 2023 survey shows worsening contamination and sedimentation; development will accelerate decline. 8. Community Amenity Urbanisation: Dwelling density will increase by 1330% in Ouruhia, destroying rural outlook. Reverse sensitivity: Farming activities will conflict with urban residents. Commercial area risks: No controls on permitted activities (e.g., liquor stores, vape shops). 9. Other Adverse Effects Economic benefits overstated: Unlike the golf resort, this is a one-off build with no ongoing employment. Radio mast hazard: 137 m transmitter at 143 Lower Styx Road poses potential health risks. Construction impacts: Noise, dust, truck movements, fill contamination risks; no adequate mitigation plan. Demand unproven: CCC long-term plan already identifies sufficient zoned land for 30 years. Cultural values: Ngāi Tahu pathways and archaeological sites not properly assessed. Contamination: Historic horticultural use raises soil contamination risks; independent testing required. Consultation lacking: Developer controls only 63.79 ha of 170 ha proposed; community consultation minimal. 10. Fairness and Transparency of Process Limited consultation: Unlike the earlier Golf Resort proposal, which consulted widely, the current developer has engaged minimally with the community. Incomplete land control: The applicant controls only ~63.79 ha of the 170 ha proposed rezoned land, raising questions about how 800 houses will be achieved. Information gaps: Reports omit key hazard data (liquefaction, tsunami evacuation, Styx River flooding) and underestimate traffic volumes. Infrastructure assumptions: The developer's own fast-track application response claims that "three-waters servicing design solutions are readily available" and that rezoning "will not place any additional demand on network infrastructure." This statement is misleading, as independent evidence shows the local water supply is insufficient, the wastewater network is already under capacity stress, and stormwater systems are highly vulnerable. By downplaying these issues, the developer has failed to provide transparent and accurate information to the public and Council. Equity concerns: Some landowners feel pressured to sell, with rezoning used as leverage to increase rates and force them out. Transparency failure: The developer has not provided clear evidence of demand, nor realistic plans for infrastructure upgrades, leaving the community uninformed and disadvantaged.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Kerry and Leith **Last name:** Wells

**Prefered method of contact**

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**Email:** Wellsie2@xtra.co.nz

**Daytime Phone:** 021 2231 518

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Note to person making submission:**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**

**Decision Requested:**

We are not against subdivision but the application is far removed from the gold course development which would have been in keeping with the existing rural outlook. If approval is granted, the following amendments are requested: 1. A requirement that the main access way is off Lower Styx Road. If access is possible of Spencerville Road, this along with Turners Road will require upgrades given the roads are not coping with existing traffic volume. 2. That potable water be supplied by CCC to ensure existing wells in the region remain viable. 3. Stipulations on housing design to be of a high standard and the requirements for open spaces

similar to the golf course proposal.

**Reason for Decision Requested:**

## Specific Provisions

Transport Three Waters Urbanisation

## Reasons

The Whisper Creek golf course development consent stipulated that the accessways would be via a major entrance off Lower Styx Road, and an entrance off Spencerville Road (with a service road off Teapes Road). The application does not include the Lowers Styx Road access and this will push significant traffic (estimated at 1,600 car movements per day) on to Spencerville and Turners Road - this are narrow country roads requiring significant upgrades and have associated traffic issues to major arterial routes. We have concerns over the future viability of water supply given the Christchurch City Council (CCC) has insufficient fresh water supply and the proposal relies on new bores - this has potential to impact on existing wells in the region. The area is zoned rural3 and the development proposal has no controls over the visual aspects of the design and construction of homes, unlike the golf proposal

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Debbie **Last name:** Ling

**Prefered method of contact**

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**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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**Note to person making submission:**

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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
oppose all aspects of the proposal

**Reason for Decision Requested:**

## Reasons

1- The Styx River. The greater Styx River corridor is home to a range of endangered species, including lizards, eels, lampreys and a variety of birds. The application has no comprehensive plan for the protection of species or their relocation, including alternative foraging and nesting sites. Over the past 25 years the quality of the Styx river has declined due to the amount of subdivisions that run into it. High levels of Zinc and sediment have affected animal life. As a child I use to catch Glass shrimp(Palaemon affinis) by the bucket to now never seeing a single one. 1a- Tsunami Concern, With the extra cars on the road leaving the area in an emergency will cause a lot of congestion and lives will be at risk. 1b- Water Table. The addition of run off from 800+ homes will cause issues with the water table, and flooding issues with the Styx River. Currently flooding has been an issue in the area for some years and adding more water to the river will only add to these issues. 2- Boundary line Our property backs onto the proposed subdivision with around 20 houses touching our boundary line Currently a 30+ year old hedge Wind break protects our property and livestock from the predominant eastly wind. With housing going in these trees would likely have to be removed at our cost (300m driveway). With the proposed buildings being on higher ground this would likely cause runoff and excess water to run into our property. 2a- Light Pollution Living on rural lifestyle block the light pollution that will be caused by the subdivision with be substantial and disruptive to those living in the area. 2b- As a hobby farm tractors, excavators, chainsaws and animals etc may breach the noise control limits of urban living. These are all necessary parts of our lifestyle and livelihood. In addition, The added noise from 800 homes their occupiers will disrupt our lifestyle. 2c- Turners road is not up to the standard to support the proposed 1800 vehicles and cause huge congestion to Marshlands Rd, Lower Styx Rd and Spencerville Rd, and the Northern Corridor especially around the school zone on Turners Rd. 14 Demand The proposal suggests there is a high demand for development in this area, however, no evidence is provided. In fact, because of the red zoning of Brooklands and associated earthquake damage to the area there is a natural caution from potential buyers to commit to this area. The CCC has already made it clear that in its long-term plan it has identified sufficient land zoned for development for the next 30 years. Together these issues negate the submission by LMM regarding potential demand for a subdivision which has many negating factors for approval including transport, flooding and inundation, lack of infrastructure, and poor geological history.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Reuben **Last name:** Ennor

**Prefered method of contact**

**Postal address:** 5 Old Windsor Ln, Bottle Lake, Christchurch, New Zealand, 8083

**Email:** reuben@ennor.co.nz

**Daytime Phone:** 027 533 7378

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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**Note to person making submission:**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
My family and I request that, Private Plan Change 23 be declined.

**Reason for Decision Requested:**

### Specific Provisions

My submission relates to the proposed rezoning of the Whisper Creek land from Specific Purpose (Golf Resort) to a residential zoning that enables medium to high-density housing. It also relates to the removal of the requirement for a golf course, public recreation areas, and public access, which were key components of the original zoning decision. My submission relates to the provisions allowing increased residential density (up to approximately 15 houses per hectare), as well as the stormwater management provisions and the treatment of the site as a flood ponding and flood management area, especially given land level changes since the Canterbury earthquakes. I am also submitting on the transport provisions of the plan change, including all assumptions regarding traffic distribution, access points, and the capacity of Lower Styx Road, Spencerville Road, Turners Road, and associated intersections. My submission additionally relates to the infrastructure provisions, including wastewater capacity, water supply, and the structural limitations of existing bridges and pipelines. I am submitting on all provisions relating to potential effects on the Styx River catchment, including environmental, ecological, flooding, and amenity impacts. Finally, my submission covers any provisions relating to changes to rural character, landscape values, and the overall amenity of the surrounding area.

### Reasons

My family and I are long-term residents on Lower Styx Road. We are concerned that the proposed Whisper Creek development will result in adverse effects on traffic safety, stormwater and flood management, natural environments, and rural character in the Lower Styx and wider Styx River catchment area. 1. Inconsistency with Existing District Plan Zoning The site is zoned Specific Purpose (Golf Resort), and the existing zoning rules provide for subdivision only in association with a golf course. The current proposal does not include a golf course or the public recreational benefits originally required. 2. Flood Ponding and Land Stability Issues The land is identified as a flood ponding and flood management area. Increasing building intensity on this site creates additional downstream flooding risks. The typography and current rural use are more suitable for long-term flood resilience. 3. Effects on the Styx River Catchment The Styx River catchment is under pressure, particularly since the earthquakes. More hard surfaces and stormwater discharge will increase runoff, sediment, and pollutants, affecting water quality and ecological values. 4. Traffic Safety and Road Capacity Issues The development is expected to generate large volumes of daily vehicle movements. Lower Styx Road is a narrow rural road not designed for this level of traffic. Upgrades would be required for Spencerville Road, Turners Road, and intersections such as Chaneys Corner. 5. Rural Amenity Effects The development would change the rural environment permanently, affecting open space, natural character, and the quiet rural lifestyle currently enjoyed by residents. 6. Public Cost and Ratepayer Burden Infrastructure upgrades required for the subdivision, including roads, bridges, and utilities, will place additional costs on ratepayers. 7. Unsuitable Land for Housing Development There is bare, flat, buildable land in nearly every direction across Canterbury. It is difficult to understand why soggy, marshy, flood-prone land continues to be designated for housing, especially in an earthquake-prone city where soil stability and long-term resilience should be priorities.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Heidi **Last name:** King

**Prefered method of contact**

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**Daytime Phone:** 0211639523

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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**Note to person making submission:**

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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Not to go ahead with any of the proposal.

**Reason for Decision Requested:**

## Reasons

My family farm is on Teapes road and this will deatroy our rural property with overpopulation, noise, traffic, and more people having access to the river and polluting it with rubbish and disturbing the native habitats. It will be a nightmare for those people who choose to live rural to have their homes and space encroached on with this big subdivision.

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# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Maccullin **Last name:** Skelly

**Prefered method of contact**

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**Email:** maccullinskelly@hotmail.com

**Daytime Phone:** 0273140200

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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**Note to person making submission:**

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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Please look at water management on the site and consider the unreversabke damage you could cause to the river and eco system. The amount of homes is un needed. And the Infastructure will not handle the large influx of people and cars on the roads

**Reason for Decision Requested:**

## Specific Provisions

The lack of I structure in the area. There is not the capacity for 800 homes in the area and the infrastructure will struggle with that many cars and people. Also the styxs river will be hugely affected by the run off of the water and the building process. This river is already at risk and declining.

## Reasons

I have family in the area and it will be detrimental to the area in which they live and farm.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Nicole **Last name:** Duxbury

**Prefered method of contact**

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**Email:** Nicoleleigh03@gmail.com

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**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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**Note to person making submission:**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Don't go ahead.

**Reason for Decision Requested:**

### Specific Provisions

The cost of maintaining the reserve for rate payers. Why ruin a good community.

### Reasons

It will take away the rural feel to spencerville. I think this will cause major pressure given the land changes due to the earthquakes and the flooding.

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# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Andrea **Last name:** Te Ohaere-Fox

**Prefered method of contact**

**Postal address:** 354 Lower Styx road, Spencerville, Chch, New Zealand, 8083

**Email:** anggordo02@gmail.com

**Daytime Phone:** 0273074833

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Not support this new subdivision going ahead.

**Reason for Decision Requested:**

### Specific Provisions

The amount of proposed households and the amount of land proposed to cover.

### Reasons

Spencerville is a quiet beachside community and the proposed subdivision would totally change that. I am concerned with the amount of traffic on the roads and the stability of the roads and land nearby.

---

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Alexander Norman George **Last name:** Neate

**Prefered method of contact**

**Postal address:** 8 Nautilus Place, Spencerville, Christchurch, New Zealand, 8083

**Email:** alex.neate@harcourts.co.nz

**Daytime Phone:** 0272494158

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Support**
**Decision Requested:**

**Reason for Decision Requested:**

### Specific Provisions

I think it’s all great. Urban sprawl which is needed. Be good to have access of this off lower Styx road also.

### Reasons

Would like to show support for growth

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Mel **Last name:** Gilmore

**Prefered method of contact**

**Postal address:** 17 Heyders Road, Spencerville, Christchurch, New Zealand, 8083

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**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Do not change the land zoning. Do not build a subdivision. Leave the land as it is and keep the uniqueness of our area.

**Reason for Decision Requested:**

## Specific Provisions

Changing the land to residential and some to Rural fringe. No subdivision.

## Reasons

This land is unique, we live here because of this. I have have lives here (born, raised, bought me first house and my second) for 40 years. This will have catastrophic impact on our semi rural living area. With natural wet lands and rural outlook. This land change is against some of the owners of this property (not owned by the person asking for land change) and will start and link on the effect to the land around it. Another subdivision putting more discharge onto our beautiful Styx river which is already now a D grade because of the many that already run into it and to run another into a river which has important heritage, like used to be a Māori blessing ground. Our infrastructure (power, sewage, drains, storm water, clean water ) will not handle this nor is it designed to handle this. We already experience flooded roads in the wet season. Our roads are not made for another 1600 cars hence why this is rural / semi rural living and should remain the same. This is a money making scheme for a few people and not the ones who have lived here generation after generation (like myself). There is no consideration for the community that is so established and live here to get away from horrible mass rabbit warrens and this land was not designed for this. Further more if this land is changed to residential the build up (as in building up the land to build) will massively increase the chances of flooding in Spencerville (which we already have issues with) putting everyone at risk. This land is rural (as in paddocks with minimal housing) which soaks up the water. We have gekos, native birds who use this land for nesting and living and this would have major effect on these. I could go on.. terrible thoughtless money making, unneighbourly act.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Jenny **Last name:** Knight

**Prefered method of contact**

**Postal address:** 247 Spencerville Road, Ouruhia, Christchurch, New Zealand, 8083

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**Daytime Phone:** 0272162934

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Keep land zoning as is or revert to rural

**Reason for Decision Requested:**

## Specific Provisions

It relates to the entire proposal

## Reasons

• Increased flooding risk to Spencerville • Increased danger for all residents during Tsunami evacuation • The effect the subdivision will have on the water quality of the Styx River • Huge additional costs to ratepayers to upgrade local roads and bridges • How the subdivision will change the character of our community from rural to urban • Loss of the green space that surrounds us • The application goes against the current zoning rules -the District Plan provides for subdivision Specific Purpose (Golf Resort) at Whisper Creek. This proposal does not include a golf course • The Whisper Creek (Golf Resort) - was granted based on the golf course providing substantial public recreation and further public access and flood mitigation areas. This application takes this away • It is understood that new intensification legislation will allow 15 house to the hectare on this land which is not fitting with the surrounding area • The land is a flood ponding and management area under the District Plan. This could cause serious issues for the area given the land changes due to the earthquakes • The typography of the land means current use (as farmland) should continue • There are potentially significant effects on the Styx river catchment in terms of amenity and flooding • Styx River catchment currently under huge pressure to carry the volume of water since the earthquakes this development will further impact this situation • Potential traffic effects: o Need for traffic lights at Chaney's corner o Both Spencerville Road and Turners Road would need substantial realignment and widening o There is no access planned for a new bridge over the Styx River to Lower Styx Road. Lower Styx Road is already a better road than Spencerville or Turners • There must be access to Lower Styx Road as 6,500 traffic movements per day will cause huge congestion and damage to roads that are already falling apart if limited to only Turners and Spencerville Road • The limited carrying capacity of the bridge for the water and sewage pipes on Spencerville Road • Two lane bridge would need to be built on Spencerville Road • Significant cost of maintaining the reserve area for rate payers • With sea level rising why is a new subdivision so close to the coast being considered • The precedent that will be set for other rural land in our community if a subdivision without a golf course proceeds

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Kimberley **Last name:** Bowden

**Prefered method of contact**

**Postal address:** 374 Lower Styx Road, Spencerville, Christchurch, New Zealand, 8083

**Email:** kmabowden@gmail.com

**Daytime Phone:** 0272463992

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**

**Reason for Decision Requested:**

**Reasons**

Leave Spencerville alone. We are a quite near rural community who just enjoy things the way they are. We chose to live here because of the quietness and the fact that isn't a lot of people around. It's perfect the way it is. I don't want to regret buying where we did! We had no idea when we purchased our house that this subdivision was looking at going in close by. Just because you can build a subdivision, doesn't mean you should! We don't have the infrastructure to accommodate a whole new subdivision. And where would it end? Start building it and next thing you know it'll be added to and then added to again, completely ruining what we have. We already have to deal with the Rolling Meadows festival every year now. We aren't a place you can just come and take over just because there's land!

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Victoria **Last name:** Knowles

**Prefered method of contact**

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**Daytime Phone:** 0221757659

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

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**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
My family do not want this to go ahead in anyway. We want the land to be left as land

**Reason for Decision Requested:**

### Specific Provisions

I don't want any of it to go ahead

### Reasons

People move out here to be close to town but have a country feel we don't want that taken away, we don't want extra traffic on our already stressed roads. We don't want our beautiful farms to be taken over. It would lower the value of the current houses, make it harder for us if we ever need to evacuate for what ever reason. Please just don't let this happen

---

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Daniel John **Last name:** Knight

**Prefered method of contact**

**Postal address:** 247 Spencerville Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** dannyknightnz@gmail.com

**Daytime Phone:** 0212228268

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Keep the current classification as a Golf Course would be a great use for a flood prone area like this. Failing this reverting back to agricultural land.

**Reason for Decision Requested:**

## Specific Provisions

#Recreational walkers in the area already have very little room with no clear/ flat areas to use of the narrow Spencerville road #No pathway between 240 Spencerville road and Chaney's corner, Ouruhia school or Spencerville #The road to the west of the proposed subdivision is very skinny between 240 Spencerville road and turners road intersection #Site 1 access directly onto Spencerville road is in a dangerous spot. This is the spot in 2013 that a driver lost control before rolling his vehicle and dying at the scene. #Biking on the road is dangerous due to blind corners #Chaney's crossing is dangerous for large or slow vehicles especially in peak times increased traffic from the proposed subdivision will increase this risk # Chaney's rail crossing is uncontrolled by barriers and increases in traffic increases the risk #Spencerville road bridge is one lane and in low sunlight conditions at each end of the day is hard to identify vehicles approaching the bridge from the opposite direction - increase in traffic will increase the risk of accident #Road realignment and widening at our front gate will decrease our driveway by 2.5meters this will make our driveway very steep to the existing driveway level and make manoeuvring large and towing vehicles difficult #Our driveway is directly opposite the proposed entrance to the subdivision - the line of sight is not as long as it should be each way and means when leaving the driveway you need to accelerate hard to clear unseen potential traffic Concerns on the proposed subdivision itself # Water draining into spencer drain will overwhelm the available capacity of the drain particularity in winter. Water sits in the paddock across the road at the head of the drain for weeks/ months over winter already without adding all of the hard surfaces in a subdivision. # Where will the farming access be for the remaining land? #Will this change the land zoning on areas around the property # Will this process allows for the rest of the same title to be rezoned allowing no notification of the future expansion of the subdivision regardless of the flood zone encroachment? Concerns in general 1. The area is historically rural with larger properties outside of the townships of Spencerville and Brooklands. 2. Rural activities happen all around the proposed subdivision and happen at all hours of the day - especially in summer when certain crops require being harvested in evening/night 3. There are no public transport options on Spencerville road 4. We moved to this location to have some space with the ability to make some noise in the shed without upsetting any neighbours 5. The applicant has made no effort to come and see us to talk through the plan and alleviate out concerns and I feel now we have to go through this process and assume worst case scenario to get a gauge on what happening with the application. The Applicant has done this without the permission of all of the landowners who I believe are against it - it is outrageous that in 2025 someone who has no stake in a property can change its status and show a huge number of buildings as it's plan. The applicant also has not said whether they have any funding in place for this - it seems like do not, and once they have what they need from this consent, it is possible/probable that they will sell the project on and any promises made in this process will disappear along with the current owners.

## Reasons

outlined above but it is fundamentally not in keeping with The area and will Make the area around the community inherently more dangerous than it now.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Andrew **Last name:** Hicks

**Prefered method of contact**

**Postal address:** 314 Lower Styx Road, Spencerville, Christchurch, New Zealand, 8083

**Email:** andrew.hicks@LIB.co.nz

**Daytime Phone:** 0223695567

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
The decision I would like the Council to make is: 1. To approve the application only with significant conditions attached that address the preservation of natural values and the enhancement of cycle safety and connectivity. 2. Regarding natural values and visual

impact: a. Condition the approval on a significant increase in the quantity and maturity of native plantings within the 5-metre landscape buffer strips, increased to a more substantial width buffer strip that allows for a private pathway, along Spencerville Road and other boundary roads. The goal should be to create a dense and effective visual screen that preserves the natural character of the approach to Spencerville and obscures the housing from key viewpoints. b. Require the developer to establish a substantial native greenbelt between the proposed development and the existing Spencerville settlement, providing a clear visual and ecological separation that allows for wildlife corridors and passive recreation. 3. Regarding road safety and cycle connectivity: a. Condition the approval on the developer funding and delivering significant safety upgrades to Spencerville Road and Lower Styx Road for their entire length connecting the development to Spencerville and the existing cycle network. This must include, at a minimum, physically separated, dedicated cycleways on these roads, not just painted lines or shared paths. b. Require the proposed shared path network to be redesigned in key areas to provide separate, dedicated paths for cyclists and pedestrians, particularly on the main thoroughfare connecting towards Spencerville. This path should be designed for safe travel at higher speeds to be a viable transport option, not just a recreational one. c. Require the creation of a direct, high-quality, and exclusive cycle path connecting the heart of the new development to the Spencerville township and its amenities, ensuring this connection is treated as a primary transport route and not a secondary recreational track. This path should be seen as a critical piece of infrastructure to reduce car dependency for the 800 new households. I'm not against the development in general, but I do protest the removal of native New Zealand because they don't want to build in a more traditional area. And believe that we need to keep parts of Christchurch green and wild. Not drive out the wildlife population. How can anyone expect to be living next to nature when everything looks cultivated? Eg, prestons looks like they want to keep nature at arms length. Also, shouldn't we be rezoned away from a small residential settlement if we're not going to be so isolated?

**Reason for Decision Requested:**

## Specific Provisions

The specific provisions that my feedback relates to are the intensity of the proposed residential development, the impact on the natural values and visual amenity of the area, and the provisions for active transport, specifically the safety of existing roads for cyclists and the design and connectivity of the proposed shared path network to the Spencerville community. My submission also addresses the proposed transport network, including the new walking and cycling tracks and their integration with Spencerville Road and Lower Styx Road.

## Reasons

My primary concern is that the increased intensity of development will negatively impact the natural character of the area, which is a significant draw for existing residents and visitors. While I acknowledge the inclusion of open green spaces and wetland restoration in the plan, I am worried that the view from Spencerville and surrounding areas will become dominated by housing, creating an eyesore and diminishing the sense of living in a green, nature-focused city. My submission is based on the belief that the development, as proposed, will transform the horizon into a continuous residential landscape. Secondly, I am heavily concerned about the impact on road safety for cyclists and other non-vehicular road users. I do not use a car and already find Spencerville Road and Lower Styx Road to be unsafe for biking. The proposal will significantly increase traffic volumes, and while it includes plans for internal walking and cycling tracks, it does not seem to provide for crucial safety upgrades to the existing roads I and others must use to connect to these new paths. I believe some thoughts from another resident has already highlighted the need for a safer space for school children biking along Spencerville Road and Turners Road, which reinforces my concern. A shared path is often not suitable for cyclists or e-scooter users travelling at a reasonable pace and can create conflict with pedestrians. Forcing cyclists onto roads that are not fit for purpose is dangerous. I have personally experienced the hazards on Lower Styx Road, where the road design can force a choice between falling into traffic or into bushes. Without dedicated and safe cycling infrastructure on the main connecting roads, the new development will only increase the danger for the growing number of people who choose to cycle. Finally, the proposed active transport links feel like an afterthought for the existing Spencerville community. The plans detail connections towards Prestons and Ouruhia, but the connection to Spencerville seems less considered. A functional cycle path needs to allow for efficient travel; it should be a preferable alternative to taking a car. The proposal does not give me confidence that I will have a safe and direct cycle route from my home in Spencerville to Prestons, for example, without being forced onto dangerous roads or slow, winding shared paths. This development should be an opportunity to create superior, dedicated cycleways that properly integrate Spencerville into the wider Christchurch cycle network, encouraging more people to get out of their cars and not to feel unsafe or unplanned for. Encourage the natural values instead of fighting it via more cars.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Jan Therese **Last name:** Burney

**Prefered method of contact**

**Postal address:** 3 Beacon Street, Brooklands, Christchurch, Christchurch, New Zealand, 8083

**Email:** chrgary.jan@xtra.co.nz

**Daytime Phone:** 033298674

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Refuse the application

**Reason for Decision Requested:**

## Specific Provisions

This submission relates to the entire proposal

## Reasons

Effects of the Proposal The key concerns and multiple adverse effects for the environment , the stormwater receiving environment, roading/transport and the effect on nearby communities

**Submitter**
**Jan Burney**
**3 & 5 Beacon Street**
**Brooklands**
**Christchurch 8083**
**Email: chrgary.jan@xtra.co.nz**
**Phone: 0275129928**

**Date: 11 November 2025**

**Plan Change 23 – Whisper Creek, Spencerville**

**A. Application to which submission relates:**

This is a submission on an application by LMM Investments 2012 (the applicant /the proposal)
This submission relates to the section 32 evaluation of the plan change and all related documents submitted by LMM and documents prepared by the Christchurch City Council (CCC) and any other relevant documents.

**B. I oppose Plan Change 23 (Whisper Creek, Spencerville) in its entirety.**

The submitter opposes all aspects of the proposal Relevant part(s) of the application . This submission relates to the entire proposal

**C. Effects of the Proposal**

The key concerns and multiple adverse effects for the environment , the stormwater receiving environment and the nearby communities, are as follows:

The Infrastructure Report (19432 Rev4, May 2025) and supporting transport assessment (Appendices B and E) fail to demonstrate alignment with the Canterbury Regional Policy Statement, Greater Christchurch Spatial Plan, Greater Christchurch Transport Plan, Canterbury Regional Land Transport Plan 2024, and Ōtautahi Christchurch Future Transport 2024–54: - and

**Key submission points**

1. **Public Transport Deficiency**
    - No public transport routes currently serve the site.
    - Route 135 terminates at Prestons and operates only hourly.
    - PT provision is described as a future possibility, not a committed, funded service with defined routes, frequencies, stops, shelters, or bus priority. → This fails integration and mode-shift requirements.

2. **Cycling and Walking Gaps**
    - No cycle facilities exist in the immediate vicinity.
    - Reliance on recreational/shared paths (Styx Mill Conservation Loop, Lower Styx Road) does not provide continuous, protected utility cycling to schools, centres, or employment.
    - No pedestrian priority treatments at intersections. → This undermines 15-minute neighbourhood and active mode objectives.

3. **Car-Inducing Road Upgrades and Weak Staging**
    - Off-site upgrades focus on road widening and a left-turn lane at Marshland/Turners Road.
    - The only staging trigger applies at the 701st dwelling.
    - No binding thresholds tied to PT commencement, protected cycling delivery, or emissions mitigation. → This locks in car dependence and risks arterial performance.

4. **No Mode Share, VKT, or Emissions Assessment**
    - Traffic increases quantified (6,560 daily; 720 peak) but no mode share targets, VKT analysis, or greenhouse gas assessment provided. → This fails regional decarbonisation and climate commitments.

5. **Safety and Vision Zero Failures**
    - Intersection designs (Figures 16, 17, and 14) are concept-only.
    - No, Safe System package, speed management, or committed school route treatments. → This does not meet Vision Zero principles.

6. **Flood Risk and Resilience Concerns**

- Flood modelling is incomplete and interim data is being used.
- Filling is proposed within the Flood Management Area to achieve platform levels.
- No evacuation modelling or redundancy analysis for access routes in flood events. → This fails resilience expectations under Ōtautahi Christchurch Future Transport 2024–54.

- **Stormwater and Receiving Environment**
  **Brooklands Context:**

  Stormwater discharge flows directly into Brooklands and the Styx River, both sensitive receiving environments.

  The application assumes that Brooklands is vacated, however the area is populated with residentially zoned properties.

7. **Stormwater Capacity Concerns:** Large roof and hardstand areas will rapidly increase runoff. Basins appear undersized and located in flood zones, risking inundation. Spencer Drain's gradient (1/6000) is inadequate for current and future flows.

8. **Critical Infrastructure Overlooked:** Pumping stations and Styx River flood gates are not considered in modelling. These gates can remain closed during tidal or flood events, causing backflow and flooding.

9. **Natural Hazard Risks:** 800 houses will add congestion to limited exit routes, undermining tsunami evacuation. The site lies within a tsunami hazard zone and is vulnerable to sea-level rise and coastal flooding.

10. **Three Waters Issues:** Potable water supply is insufficient. Reliance on bores risks over-allocation and impacts on nearby wells.

11. **Ecological Degradation:** The Styx River is already degraded. A 2023 Boffa Miskell survey shows rising zinc and sediment levels linked to urbanisation. The applicant's ecological assessment ignores this evidence. Untreated or poorly treated stormwater will worsen contamination, harming invertebrates and collapsing the food chain.

12. **Infrastructure Strain:** Increased reliance on the one-way Spencerville Road bridge for city access and recreation. The bridge is inadequate and requires upgrading to two lanes.

13. **Misalignment with Funding Programmes**
    - The Long Term Plan (2024–2034) identified no relevant transport projects supporting the rezoning.
    - Required upgrades and services are unfunded and not sequenced in RLTP/NLTP. → This undermines deliverability and strategic network protection.

**Conclusion**

The proposed rezoning introduces significant transport and infrastructure risks without demonstrating compliance with higher-order planning instruments.

I reserve the right to expand on these points in greater detail during the next submission phase or hearing, including reference to specific policy clauses, modelling assumptions, and infrastructure delivery risks.

Date: 17 November 2025

Submitter:

Jan Burney
Brooklands
Christchurch 8083
chrgary.jan@xtra.co.nz

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Brad **Last name:** Uren

**Prefered method of contact**

**Postal address:** 190 Giles Road, RD2, Kaiapoi, New Zealand, 7692

**Email:** braduren50@gmail.com

**Daytime Phone:** +447505470496

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

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I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Don't approve this plan

**Reason for Decision Requested:**

### Specific Provisions

The whole lot

### Reasons

The area does not need any more houses or cars.... It already can't handle the traffic

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Natasha **Last name:** Hough

**Prefered method of contact**

**Postal address:** 97 Neville Street, Spreydon, Christchurch, New Zealand, 8024

**Email:** natasha.m.hough@gmail.com

**Daytime Phone:** 021313444

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Decline the entire proposed Private Plan Change

**Reason for Decision Requested:**

### Specific Provisions

The entire proposed Private Plan Change

### Reasons

- We don't need another development poisoning the Styx river - The area doesn't have the infrastructure to handle 800 homes + potentially 1800 cars

---

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Dan **Last name:** McGarvey

**Prefered method of contact**

**Postal address:** 6 Hemingway Place, Spencerville, Christchurch 8083, Christchurch, Christchurch, New Zealand, 8083

**Email:** dan_rachel@xtra.co.nz

**Daytime Phone:** 0274405507

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Reject the proposal

**Reason for Decision Requested:**

## Specific Provisions

potential flood risk lack of infrastructure to support that amount of housing

## Reasons

The lower Styx river is not adequate to support that much storm water overflow; this river has flooded on numerous occasions in the past and always floods in the direction of the proposed subdivision. Any modification or raising of the riverbank on that side of the river will place all properties on the other side of the river at risk of potential flooding. It makes no sense to increase the flooding risk to an area which has already been identified as under threat in the latest flood management plan released recently.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Gail **Last name:** Lowe

**Prefered method of contact**

**Postal address:** 209 Spencerville Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** gail_marden@yahoo.co.uk

**Daytime Phone:** 0221739493

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
To deny the proposed plan change in its entirety, to maintain and support the green spaces, waterways and ecology that make this area so special.

**Reason for Decision Requested:**

## Specific Provisions

Proposed private plan change, specifically the rezoning of land around Spencerville and Turners road to Residential New Neighbourhood zone

## Reasons

The huge disparity between the impact of a recreational golf course and the impact of 800 residential properties in an area prone to flooding and potential tsunami risk. The environmental impact of proposed changes on the sensitive Styx River and its surroundings. The impact on traffic and infrastructure along Spencerville and Turners road, as well as the lack of amenities to serve such a huge increase in population in the area, more than tripling the current number of residences in the area.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Gary **Last name:** Altenburg

**Organisation:** Gracmo Limited

**Prefered method of contact**

**Postal address:** Level 1, 93 Manchester Street, Christchurch Central City, Christchurch, New Zealand, 8011

**Email:** claire@inovo.nz

**Daytime Phone:** 0223840036

**Mobile:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Support**
**Decision Requested:**
The submitter generally supports the Whisper Creek Residential Plan Change (PC23) in its current form on a conditional basis to include: 1. It is zoned so that the area of 176 Turners Road has a minimum of 75% residential zoned land whilst the remaining land (25% of the site) is for stormwater management area. 2. The stormwater management area is appropriately sized to collect the stormwater runoff from the future impervious area on 176 Turners Road. The submitter considers that the Christchurch City Council accept and approved PC 23 as notified.

**Reason for Decision Requested:**

## Specific Provisions

The submitter generally supports the Whisper Creek Residential Plan Change (PC23) in its current form on a conditional basis, as detailed in the provided submission memo.

## Reasons

1. Efficient use of land. 2. Alignment with strategic planning documents. 3. Positive urban design and community outcomes. 4. Positive environmental, social, and economic effects. 5. Consistency with the purpose of the RMA (Section 5).

52

# MEMORANDUM

## 176 Turners Road, Ouruhia

## Prepared for Gracmo Limited

| | | |
|---|---|---|
| PROJECT | 176 Turners Road | November 2025 |
| SUBJECT | Submission on the Whisper Creek Residential Plan Change (PC 23) | |
| ISSUED BY | Claire Deng | Senior RM Planner |
| ISSUED TO | Gary Altenburg, Gracmo Limited | |
| FILE / REF No. | 16331 | |

13 November 2025

Christchurch City Council
PO Box 73013
Christchurch 8154

Via online submission: https://letstalk.ccc.govt.nz/PC23

**Submitter Details**

**Name:** Gracmo Limited
**Submitter address:** 176 Turners Road, Ouruhia, Christchurch (Lot 3 DP 76333)

**Agent Contact Details**

**Contact name:** Claire Deng
**Contact organisation:** Inovo Projects Ltd
**Contact address:** Level 1, 93 Manchester Street, Christchurch 8011
**Email address:** claire@inovo.nz
**Phone number:** 022 384 0036

**Trade Competition Declaration:**

Gracmo Limited (herein known as the Submitter), does not have the ability to gain trade competition advantage through this submission.

**Hearing Options:**

The submitter reserves the right to be heard in support of their submission.

**Submission**

The submitter generally supports Plan Change 23 in its current form, although it is conditional on the basis to include:

- It is zoned so that the area of 176 Turners Road has a minimum of 75% residential zoned land whilst the remaining land (25% of the site) is for stormwater management area.
- The stormwater management area is appropriately sized to collect the stormwater runoff from the future impervious area on 176 Turners Road.

# 1 Submitter – Background

The Submitter is the owner of 176 Turners Road ("The Submitter's Property"), Ouruhia. Plan Change 23 proposes to rezone the Submitter's Property from Rural Urban Fringe Zone to Residential New Neighbourhood Zone. As shown in Figure 1, approximately 75% of the Submitter's Property includes 52 residential lots and associated roads, and the remaining 25% of land at the south-eastern section will be subject to a stormwater management area (Basins C in Figure 1).

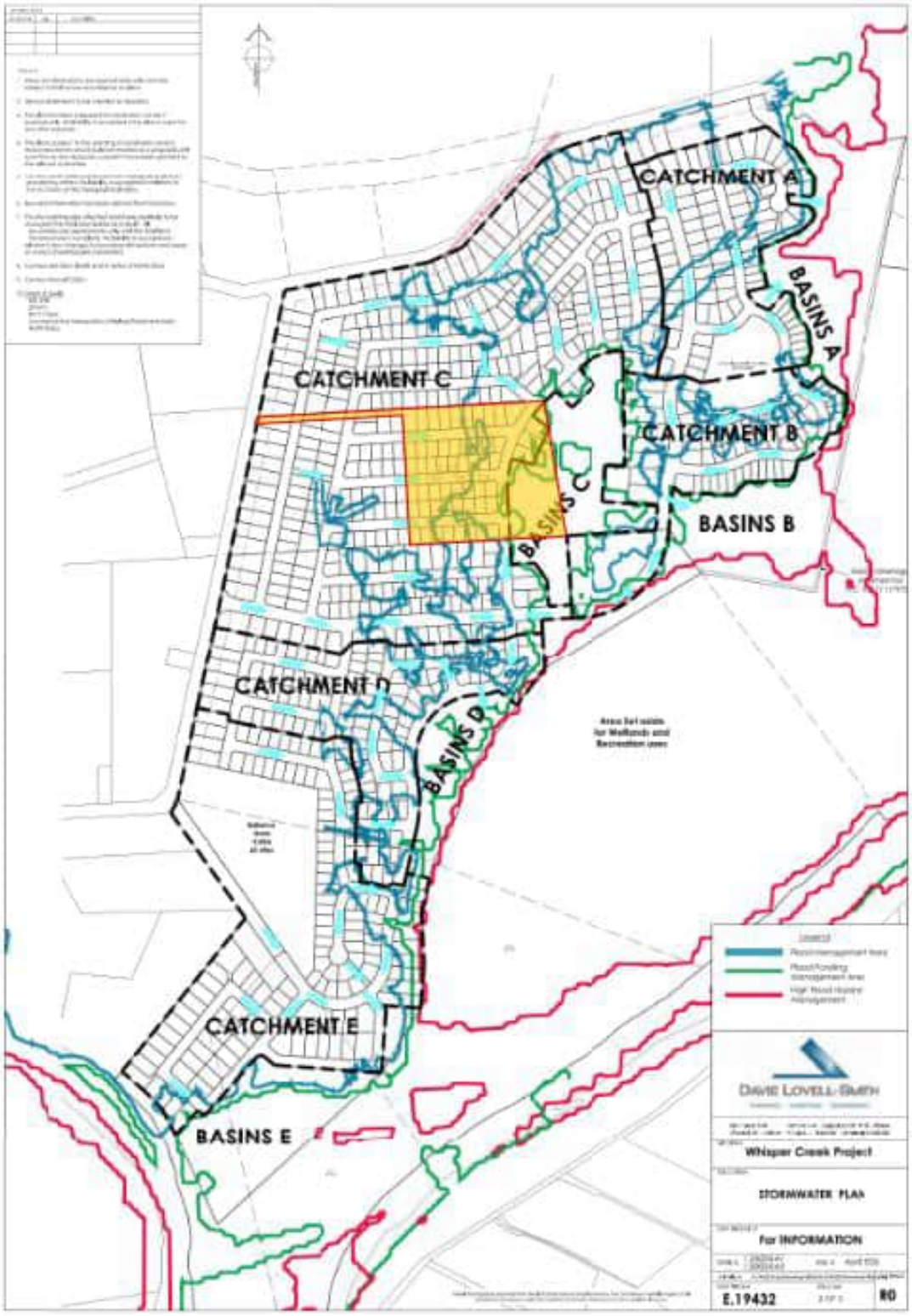


*Figure 1. The Location of 176 Turners Road (yellow) in Relation to the Proposed Master Plan under Plan Change 23.*

52

# 2 Reasons for Submission

The Submitter supports the plan change due to the following reasons:

| | |
|---|---|
| **Efficient use of land** | The proposed rezoning will enable well-planned residential development in an area adjacent (2km) to the metropolitan area of Christchurch. This supports efficient use of land and existing roading and servicing infrastructure at Spencerville, which is consistent with the intent of the Residential New Neighbourhood Zone (Chapter 14 Residential of the Christchurch District Plan). |
| **Alignment with strategic planning documents** | Plan Change 23 gives effect to the Canterbury Regional Policy Statement and the Greater Christchurch Spatial Plan by providing additional housing capacity in a logical growth location that aligns with infrastructure investment and the city's long-term urban form.<br><br>It is also considered to contribute to the well-functioning environment of Christchurch City through creating additional dwellings in close proximity to established residential neighbourhood. This is consistent with the national direction under National Policy Statement on Urban Development 2020. |
| **Urban design and community outcomes** | The proposed Outline Development Plan (ODP) provides an integrated approach to stormwater management, flood mitigation, transport access, and servicing.<br><br>The retention of the Open Space Waterway and Margins Zone along the Styx River appropriately manages flood risk and maintains ecological and amenity values. |
| **Positive environmental, social, and economic effects** | Plan Change 23 provides new housing supply (approximately 800 dwellings) contributing to the city's growth needs. It enables the provision for a community hub and commercial hub which supports local employment and investment opportunities. In addition, it maintains and enhances natural features and open spaces adjacent to the Styx River corridor. |
| **Consistency with the purpose of the RMA (section 5)** | The plan change promotes the sustainable management of natural and physical resources by enabling people and communities to provide for their social, economic, and cultural wellbeing while safeguarding the life-supporting capacity of air, water, soil, and ecosystems. It is consistent with the outcome sought by the RMA. |

# 3 Summary

The Submitter generally supports the Whisper Creek Residential Plan Change (PC 23) in its current form on a conditional basis and considers that the Christchurch City Council **accept and approve Plan Change 23 as notified.**

**Claire Deng**

Senior RM Planner
022 384 0036
claire@inovo.nz

**Jono Begg**

Planning Manager
020 4000 0294
jono@inovo.nz

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Ross C F and Karen A **Last name:** Winter

**Prefered method of contact**

**Postal address:** 402 Lower Styx Road, Spencerville, Christchurch, New Zealand, 8083

**Email:** winterkaren402@gmail.com

**Daytime Phone:** 0332988990274357435

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Decline the application

**Reason for Decision Requested:**

## Specific Provisions

All

## Reasons

We are own the neighbouring land 266 Spencerville Road

We are writing a formal objection to proposed plan changes to the Whisper Creek subdivision. We operate a farming enterprise located at 266 Spencerville Road and 363 Spencerville Road. The proposed subdivision (development) is likely to have significant negative impacts on our agricultural operations, productivity and long-term business viability.

**1 INCREASED LAND USE CONFLICT**

The increased of residential properties adjacent to active farmland increases the risk of complaints regarding standard farming activities such as machinery noise, dust, early morning operations, livestock movements (i.e. One example being livestock, shipped from the North Island arriving at one o'clock in the morning in stock trucks.) spraying and manure management.

**2 BIOSECURITY AND ANIMAL WELFARE**

Residential development increases foot traffic, domestic dogs, pests (i.e. Canadian geese, possums, pukeko and domestic cats) and unauthorised access. This poses biosecurity risks, potential crop contamination and disruption to livestock.

**3 INCREASED PRESSURE ON WATER RESOURCES**

The availability of quality water is essential for our farming practise.

**4 DRAINAGE**

Predicted flood frequencies are based on statistics from historic events. Climate change will increase the frequency and severity of flooding, meaning today's 1-in-50-year flood will likely become a more frequent flooding event in our future which will impact the Puharakekenui / Styx River and Spencerville Drain

The Spencerville drain is not adequate to safely handle the flow of water from the new 800 houses subdivision and commercial area. The Spencerville drain runs into the Styx River at about 3 KM north from our property. At present it is 5 days to a week when the river/ drain overflows, before the water leaves our property. About 10 hectares are covered with the water. Untreated, or poorly treated, stormwater flowing into the Spencerville drain can bring fine sediments and contaminants into the drain, which smother the stream bed and can be directly consumed by freshwater fauna.

The Puharakekenui / Styx River is currently classified with a **D-grading** (the lowest in New Zealand) due to ongoing degradation. The primary cause is the deposition of **silt and sediment** from urban development and land-use intensification, leading to poor water quality and loss of sensitive native species. Minimising this intensive land-use change (e.g., urbanisation) in the catchment may assist in maintaining aquatic ecological health.

We ask that you adopt the concept promoted by Gordon Griffin (Lincoln University 1975) "that low land should not be allocated to residential use" he was referring to lower reaches of the Styx River.

## 5 Current land use

**"The existing use of the site for grazing and very low density rural lifestyle activities is considered to be an inefficient use of the land relative to urban residential use and development. As concluded in the economic assessment (Appendix A), the proposed Plan Change will provide for increased competition and choice in residential land markets and help address declining housing affordability"**

We contest this statement, if grazing is an inefficient use of this fertile land relative to urban residential then a change is needed in how you farm. The catchment of the Styx River already is a efficient major horticultural area providing vegetables for Christchurch. We graze and breed stud Hereford cattle and commercial high quality beef cattle on our fertile land in the catchment which is an efficient use of the land. We are confident that the future will provide more opportunities for still more efficient use of this land. Once this land is in housing the next and further generations have lost this opportunity. This fertile land will be irreversibly lost for food production.

Theodore Roosevelt 26th President of the United States 1858-1919 said "**The nation behaves well if it treats the Natural Resources as assets which it must turn over to the next generation increased and not impaired in value"**

## 6 Transport

We have concerns regarding the one lane bridge on Spencerville Road near Lower Styx Road. This one land bridge has approaches that give poor visibility of approaching traffic for motorists, cyclists. and pedestrians. This will cause risks to life with the increased transport from the subdivision.

Spencerville Road is categorised as a collection road in the district plan. It has no footpaths and no street lighting and with the increased traffic, walking along this road will be very dangerous.

**We ask that that these all of these concerns be given full consideration in the assessment of the application.**

**Name Ross F C Winter and Karen A Winter**

**Address 402 Lower Styx Road**

**Spencerville**

**Contact numbers 0274357435 and 03 3298-899**

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Jesse **Last name:** Lowe

**Prefered method of contact**

**Postal address:** 209 Spencerville Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** jd.lowe16@gmail.com

**Daytime Phone:** 021952433

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

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**Note to person making submission:**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Reject the proposal. Discourage the rezoning and"urban sprawl".

**Reason for Decision Requested:**

### Specific Provisions

I oppose the application in full, for the following reasons: The proposed rezoning of the land from Special Purpose Golf Resort Zone and Rural Urban Fringe to Residential New Neighbourhood, including x4 existing Rural Urban Fringe (RUF) blocks. The overall subdivision proposal, including the re purposing of viable farmland and the scale and density of the housing being sought. The lack of any meaningful access or transport-network improvements, particularly at the Lower Styx Road / Spencerville Road intersection. The inherent ecological risks associated with development and construction of this scale. The absence of clear or sufficient benefits to the existing community.

### Reasons

I oppose the proposal in its entirety, for the following reasons: The development is largely self-serving and does not adequately provide for low-cost housing, community housing, or genuinely affordable housing. Existing residents will experience negative impacts, including increased traffic volumes, higher carbon emissions and pollution, and elevated risks to pedestrians and cyclists due to additional vehicles on local roads. The proposal reduces the amount of green space currently available in the area. There has been insufficient consultation with the local community who live in and will be directly affected by the development. The use of the Fast-Track process appears to serve little purpose other than to bypass meaningful engagement with affected parties. The rationale for using this process is unclear. If the intent is to avoid objections, this is deeply concerning. The ecological risks associated with the development outweigh any claimed benefits, particularly under a Fast-Tracked process. Statements within the appendices that the project is “likely to be economically viable” are not sufficient justification for proceeding. There is significant vagueness regarding ecological risks. While flood risk is acknowledged, there is little clarity about the level of development risk considered acceptable, and no firm commitments to mitigation measures. Infrastructure and servicing constraints are noted, yet the documentation lacks clear explanations of how these issues will be addressed, creating considerable uncertainty. Several of the claimed benefits are "NOT GUARANTEED", and many risks are not fully quantified. There is unclear long-term management responsibility, including who will inherit costs if mitigation fails or if development-related issues arise in future. For these reasons, I do not support this proposal and do not wish to see it proceed.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Karen Wakelin **Last name:** Wakelin

**Organisation:** Murray Wakelin Family Trust

**Prefered method of contact**

**Postal address:** 395a Lower Styx Road, Spencerville, Christchurch, New Zealand, 8083

**Email:** mkjc.wakelin@xtra.co.nz

**Daytime Phone:** 033298749

**Mobile:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Leave zoning as is or revert to farming which is in keeping with the surrounding area

**Reason for Decision Requested:**

### Specific Provisions

All of the proposal

### Reasons

• Increased flooding risk to Spencerville • Increased danger for all residents during Tsunami evacuation • The effect the subdivision will have on the water quality of the Styx River • Huge additional costs to ratepayers to upgrade local roads and bridges • How the subdivision will change the character of our community from rural to urban • Loss of the green space that surrounds us • The Whisper Creek (Golf Resort) - was granted based on the golf course providing substantial public recreation and further public access and flood mitigation areas. This application takes this away • The land is a flood ponding and management area under the District Plan. This could cause serious issues for the area given the land changes due to the earthquakes • The typography of the land means current use (as farmland) should continue • There are potentially significant effects on the Styx river catchment in terms of amenity and flooding • Styx River catchment currently under huge pressure to carry the volume of water since the earthquakes this development will further impact this situation • Potential traffic effects: o Need for traffic lights at Chaney's corner o Both Spencerville Road and Turners Road would need substantial realignment and widening o There is no access planned for a new bridge over the Styx River to Lower Styx Road. Lower Styx Road is already a better road than Spencerville or Turners • There must be access to Lower Styx Road as 6,500 traffic movements per day will cause huge congestion and damage to roads that are already falling apart if limited to only Turners and Spencerville Road • The limited carrying capacity of the bridge for the water and sewage pipes on Spencerville Road • Two lane bridge would need to be built on Spencerville Road • Significant cost of maintaining the reserve area for rate payers • With sea level rising why is a new subdivision so close to the coast being considered • The precedent that will be set for other rural land in our community if a subdivision without a golf course proceeds Spencer Drain is at capacity now without further water going in to it. It is also unmaintained.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Anne **Last name:** Scott

**Prefered method of contact**

**Postal address:** 283 Memorial Ave, Burnside, Christchurch, New Zealand, 8053

**Email:** scotts@snap.net.nz

**Daytime Phone:** 0274504216

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Decline the application.

**Reason for Decision Requested:**

### Specific Provisions

I abject to this plan change on the grounds that this land is not suitable for residential development. It should be retained as a wetland and river overflow area to protect the existing residential areas that have already been built. I have used the surrounding areas for recreation for many years. It regularly floods and with rising sea levels this will only get worse. There are better places in Christchurch to build with less risk.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** John **Last name:** Hawkins

**Prefered method of contact**

**Postal address:** 13 dickeys rd Belfast, christchurch, christchurch, New Zealand, 7670

**Email:** sam@stoneyhurst.co.nz

**Daytime Phone:** 0272906014

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

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**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
We oppose the application for the reason outlined above

**Reason for Decision Requested:**

### Reasons

• The plan change area is approximately 1 km from Brooklands Lagoon, which is considered to have significant ecological and cultural values. The plan change area within the vicinity have the potential to increase stormwater runoff and alter local hydrology, which may affect the timing, volume, and quality of water entering the lagoon. These changes could lead to erosion, increased sedimentation, or elevated nutrient loads, potentially impacting species that inhabit the area and rely on the lagoon's vegetation. The potential effects on the lagoon from the plan change do not appear to have been fully addressed in the information provided. This is important given the level of change proposed. • The Traffic Assessment prepared by Novo Group does not adequately consider the impact of the proposed development on the Marshlands Road and Prestons Road intersection. This intersection is already congested during peak periods, and additional residential development of the proposed scale is expected to exacerbate pressure on this key route, which serves as a primary access from Christchurch City. The intersection is adjacent to a BP service station, New World, and new commercial developments currently under construction, all of which are likely to affect the functionality of the transport network. Novo Group has acknowledged the increased traffic volumes from the development, citing the need for upgrades at the Marshlands Road and Turners Road intersection. While the assessment anticipates only a one-minute increase in travel time from Guthrie Road to QEII Drive, it does not account for congestion at the State Highway 74 / Marshlands Road intersection or the Briggs Road / Marshlands Road intersection. Many commuters will travel from jobs in Christchurch to this new development area via these intersection routes, leading to additional congestion and queuing at the Marshlands Road and Prestons Road intersection. Currently, right-turning vehicles at the Marshlands Road and Prestons Park intersection can experience wait times of up to 10 minutes in peak times due to the existing traffic signal configuration, highlighting the current level of congestion. Vehicles frequently queue beyond the designated turning lane, which further restricts the flow of traffic travelling straight through the intersection. There are no dedicated bus lanes in this area either, so the congestion could slow down the use of public transport and increase reliance on independent vehicles in this location.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** David Matthew Holden **Last name:** Tipple

**Prefered method of contact**

**Postal address:** 30 Quaids Road, Marshlands, Christchurch, New Zealand, 8051

**Email:** david@guncity.com

**Daytime Phone:** 033751041

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

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I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Support**
**Decision Requested:**
Approve the proposed private plan change.

**Reason for Decision Requested:**

## Specific Provisions

The rezoning of land at 144 Turners Road and 161 Lower Styx Road

## Reasons

1. Housing need and choice – in particular limited greenfield options for people who want a new home that isn't a townhouse in an inner suburb; 2. Better use of land than a golf resort/ better to deliver more housing than tourist accommodation; 3. Great location that's closer to town than many other greenfield locations in Selwyn and Waimak, with an existing primary school and proximity to a wide range of recreational opportunities and links into Spencerville and Prestons 4. Great opportunity to help facilitate public access to a long section of the Styx River and associated ecological restoration; 5. Not highly productive land, with existing lifestyle blocks not efficient for productive farming; 6. Carefully considered Outline Plan that provides good linkages and plan change boundary interfaces.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Dr Gabrielle **Last name:** Wall

**Organisation:** Ōuruhia Model School

**Prefered method of contact**

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**Daytime Phone:** 0274790441

**Mobile:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Support**
**Decision Requested:**
Ōuruhia Model School supports Private Plan Change 23 – Whisper Creek Residential, and respectfully requests that the Christchurch City Council: 1. Approve the plan change, recognising its positive contribution to local education provision and the long-term viability of schooling in the area. 2. Ensure the Outline Development Plan continues to: a. Facilitate safe active travel routes to local schools. b. Provide connected street networks that enable parents and children to access Ōuruhia Model School efficiently. c. Support opportunities for place-based learning through integration with open space networks, ecological areas, and the Styx River corridor. 3. Encourage staging and infrastructure development that aligns with predictable roll growth, enabling schools to plan confidently, sustainably, and efficiently for new learners. 4. Recognise the opportunity of Ōuruhia Model School as the local school for the community within the wider planning framework, and ensure future refinement of the Outline Development Plan continues to take education access and safety into account.

**Reason for Decision Requested:**

## Specific Provisions

This submission relates to all provisions of Private Plan Change 23 – Whisper Creek Residential that have implications for local education provision and schooling, specifically: • The proposed rezoning of land at 144, 156, 176 Turners Road and 174, 220, 240 Spencerville Road to Residential New Neighbourhood, enabling approximately 800 new dwellings. • The staging framework and Outline Development Plan, which will influence the timing and distribution of new families and school-aged children in the area. • The proposed Neighbourhood Centre and associated transport and access provisions, as these shape safe, equitable, and accessible travel routes to education facilities. • Retention and management of the Open Space Waterway and Margins Zone along the Styx River, which provides ecological, recreational, and learning opportunities for the local school community. These provisions have direct relevance for future educational demand and infrastructure needs for the Ōuruhia-Spencerville-Lower Styx area. This directly affects Ōuruhia Model School, which serves as a local primary school in the area.

## Reasons

Ōuruhia Model School is a well-established and community-centred primary school with a long-standing presence in the area. As the development land sits wholly within the school's current enrolment scheme home zone, the proposed residential neighbourhood will naturally form part of Ōuruhia Model School's future learning community. The school has capacity for approximately 150 additional students, significantly more than the existing roll. This positions the school to proactively support population growth, maintain strong educational continuity, and integrate new families into a supportive and connected learning environment. Ability to accommodate roll growth with minimal capital expenditure: The school's existing infrastructure, grounds, and teaching spaces enable it to absorb the anticipated student yield without requiring immediate capital investment from the Ministry of Education. This ensures: • Efficient use of existing education infrastructure. • Cost-effective growth, reducing pressure on government investment. • A smooth transition for new families as the subdivision develops over time. • Integration of a new community into an established school community. The staged nature of Whisper Creek (10 stages of approx. 50 dwellings each) further supports predictable roll growth, allowing the school to plan staffing, resourcing, and curriculum programs sustainably while working closely with the Ministry. We sought advice from the Ministry regarding projected rolls, and they offered the following insights. • The subdivision is entirely within Ōuruhia Model School's home zone. • Expected student yield may range between 0.21 and 0.31 Year 1–8 students per dwelling, depending on housing typology. • If Whisper Creek mirrors developments such as Prestons, the yield is likely toward the higher end (~0.29–0.31). • For 500–800 dwellings, this represents an estimated 145 to 248 primary-aged students over time. This aligns well with Ōuruhia Model School's available capacity and provides a valuable opportunity to strengthen: • The school's roll stability and long-term viability, • Diversification of the school community, and • The local learning network across the area, including partnerships with neighbouring schools. Ōuruhia Model School would work closely with the Ministry to ensure the school was able to grow to meet capacity. Aspirational educational opportunities created by the development: The Whisper Creek development presents an opportunity to: • Build a thriving, well-connected school community linked to new families. • Enhance access to local education through safe walking and cycling connections. • Strengthen place-based learning opportunities connected to the Styx River, open spaces, and ecological corridors. • Support a community hub where the school, neighbourhood centre, and new residential areas work together to foster educational, social, and wellbeing outcomes. The plan change aligns with broader goals of creating liveable neighbourhoods that support children's learning, mobility, and safety. These are values that resonate strongly with Ōuruhia Model School's vision and aspirations.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Jamie **Last name:** Moir

**Organisation:** Rolling Meadows

**Prefered method of contact**

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**Email:** jamie@sub180.co.nz

**Daytime Phone:** 0278671810

**Mobile:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Consider making the festival exempt from noise complaints from this development

**Reason for Decision Requested:**

### Specific Provisions

The rezoning into residential zone

### Reasons

We are concerned this will impact our consented festival at 240 Lower Styx Road

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Pauline **Last name:** McGuigan

**Prefered method of contact**

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**Email:** raymcguigan@hotmail.com

**Daytime Phone:** 0211186240

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
To ensure the surrounding and receiving environment is placed in the same position for post-development as exists now for pre-development I request calculations confirming the capacity of 'Spencers Drain' in storm events for both pre-development and post development. I also believe Christchurch City Council must ensure the development proceeds in accordance with the conditions for consent to discharge into the Styx River, CRC252424 (Amended CRC231955) Particular Note to: Condition #29.b. "Within the Puharakekenui/Styx River catchment, all stormwater quantity mitigation facilities serving greenfield development discharging to

surface water authorised by the Consent Holder after commencement of this consent, provide Full Flood Attenuation.

**Reason for Decision Requested:**

## Specific Provisions

INFRASTRUCTURE REPORT FOR WHISPER CREEK - PROPOSED SUBDIVISION - PLAN CHANGE 23 - INFRASTRUCTURE REPORT 19432 Rev 4 - Dated May 2025 TOPICS I WISH TO SUBMIT ON INCLUDE: 2.5 - FLOODING Pg 6 4. - STORMWATER Pg 9

## Reasons

The above-mentioned report comments on both flooding and stormwater, with emphasis being on the proposed design within the subdivision, however comments on effects outside of the area proposed for subdivision is minimal. Reference is made to an existing drain (Spencers Drain) and the Styx River for the purpose of discharging stormwater from the proposed development. Spencers Drain is a man-made drain which serves rural land beyond the proposed development area and exits into the Styx River at Brooklands, and north of Earlham Street. Styx River is accepted as the receiving environment for stormwater from the proposed subdivision's internal stormwater system however the report notes it is expected Christchurch City Council will RECOMMEND a 'full detention' strategy.

# Infrastructure Report

## Spencerville Road, Brooklands

## Whisper Creek - Proposed Subdivision

19432 Rev4

May 2025

DAVIE LOVELL-SMITH

PLANNING SURVEYING ENGINEERING

Shaping the future since 1880

## Revision History

| Rev Number: | Prepared By: | Description: | Date: |
|---|---|---|---|
| Rev 1 | AJEH | Reassessed Stormwater | 2 July 2018 |
| Rev 2 | AJEH | New Layout | 20 May 2019 |
| Rev 3 | AJEH | Stormwater Compensation Volumes | 15 Sept 2019 |
| Rev 4 | AJEH | Development extended to 800 sites | 7 May 2025 |
| | | | |
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| | | | |

## Document Control

| Action: | Name: | Signed: | Date: |
|---|---|---|---|
| **Prepared By** | Andy Hall | | 7-5-25 |
| **Reviewed By** | Todd Inness | | 7-5-25 |
| **Approved By** | Andy Hall | | 7-5-25 |

This report has been prepared by Davie Lovell-Smith Ltd on the specific instructions of our client. It is solely for our clients use for the purpose for which it is intended and in accordance with the agreed scope of work. Any use or reliance by any person contrary to the above, to which Davie Lovell-Smith Ltd has not given prior written consent, is at that persons own risk.

**CONTENTS:**


1. GENERAL ..... 1
1.1. INTRODUCTION ..... 1
1.2. SITE ..... 2
2. SITE CONDITIONS ..... 4
2.1. SOILS ..... 4
2.3. GEOTECHNICAL ASSESSMENT ..... 4
2.4. CONTAMINATION ASSESSMENT ..... 5
2.5. FLOODING ..... 6
3. EARTHWORKS ..... 8
4. STORMWATER ..... 9
5. ROADING ..... 12
8. POWER/TELEPHONE/STREET LIGHTS ..... 20
9. CONCLUSION ..... 21
APPENDIX A – WATER SUPPLY CONSULTATION WITH COUNCIL ..... 22
APPENDIX B – WASTEWATER MODELLING MEMO ..... 23
APPENDIX C – EARTHWORKS PLAN ..... 24
APPENDIX D – ROADING CROSS SECTIONS ..... 25
APPENDIX E – TRUNK SEWER ROUTE ..... 26
APPENDIX F – STORMWATER CONCEPT PLAN ..... 27
APPENDIX G – FLOODING PLAN ..... 28

# 1. GENERAL

## 1.1. INTRODUCTION

This infrastructure report addresses servicing of the proposed residential development at 174, 220 & 240 Spencerville Road, 144 & 156 Turners Road and 21 & 24 Teapes Road, Spencerville.

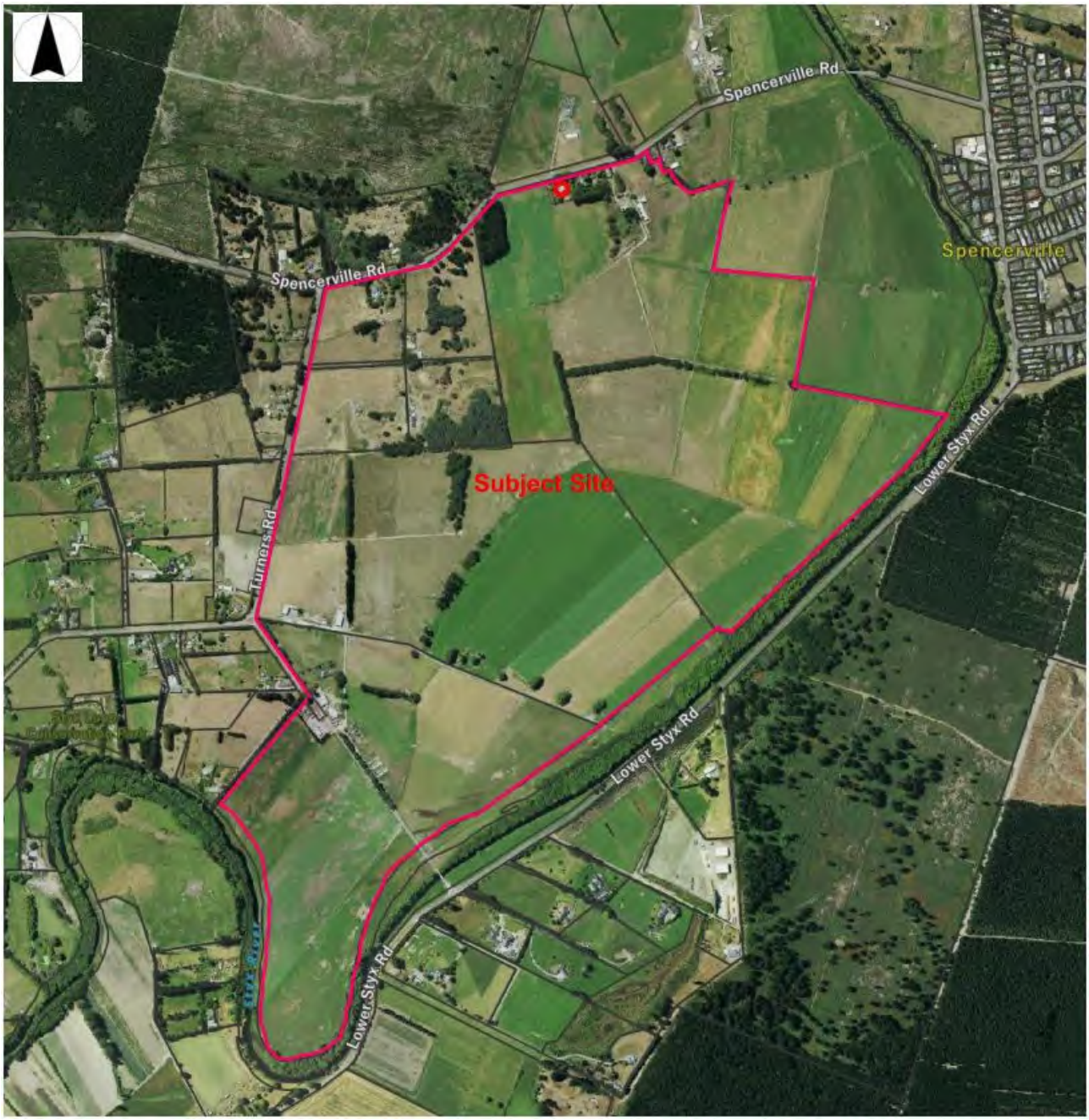



*Figure A. Location Plan.*

The total area of the plan change is approximately 170.3ha. Following approval of the plan change, it is proposed to subdivide the site into 800 residential lots, associated roads, balance land and reserves.

This report addresses the servicing of the proposed subdivision including stormwater treatment, storage, disposal and reticulation, sewer reticulation, water supply, earthworks, groundwater, roading, pavements, power and telecom.

Consultation will be undertaken with Orion and Enable to ensure the coordinated provision of these services.

A geotechnical investigation has shown that the soils are suitable for residential development, subject to standard land remediation and foundation design requirements. A copy of the Geotechnical Report is included with the application.

The design and construction of the proposed sub-division infrastructure will comply with the requirements of the Christchurch City Council (*Council*) standards.

## 1.2. SITE

The site has historically been used as a dairy farm and it continues to be grazed open pasture, along with four 4ha blocks located in the northeast corner, each of which contain a dwelling and garden curtilage. The current uses are best described as a small farm and lifestyle blocks.

The site is bounded by Spencerville Road to the north, Turners and Teapes Roads to the west, and the Styx River to the east and south.

The site has two distinct terrace levels, the lower level is along the edge of the river and is flood prone, and the upper level adjacent to the roads where the development is proposed.

The site is approximately 1km from Spencerville. Spencerville can be accessed east along Spencerville Road. Travelling west along Spencerville Road leads to Kainga and Chaneys.

There are seven houses and a number of farm buildings on the property. All of the farm buildings will be removed. Some housing may be retained.

Trees and fencing within the site will be removed along with other features such as silage pits.

Some years ago the site was identified by foreign investors as a potential golf resort and they were successful in obtaining a Specific Purpose Golf Resort Zone for the land. The existing zoning provides for residential housing, a hotel, apartments, a golf academy, a driving range, a golf course and a number of lakes woven into the golf course. The project eventually became commercially unfeasible and the site was on-sold. Please refer to Fig.B for the existing ODP od the area with the Golf Resort described.

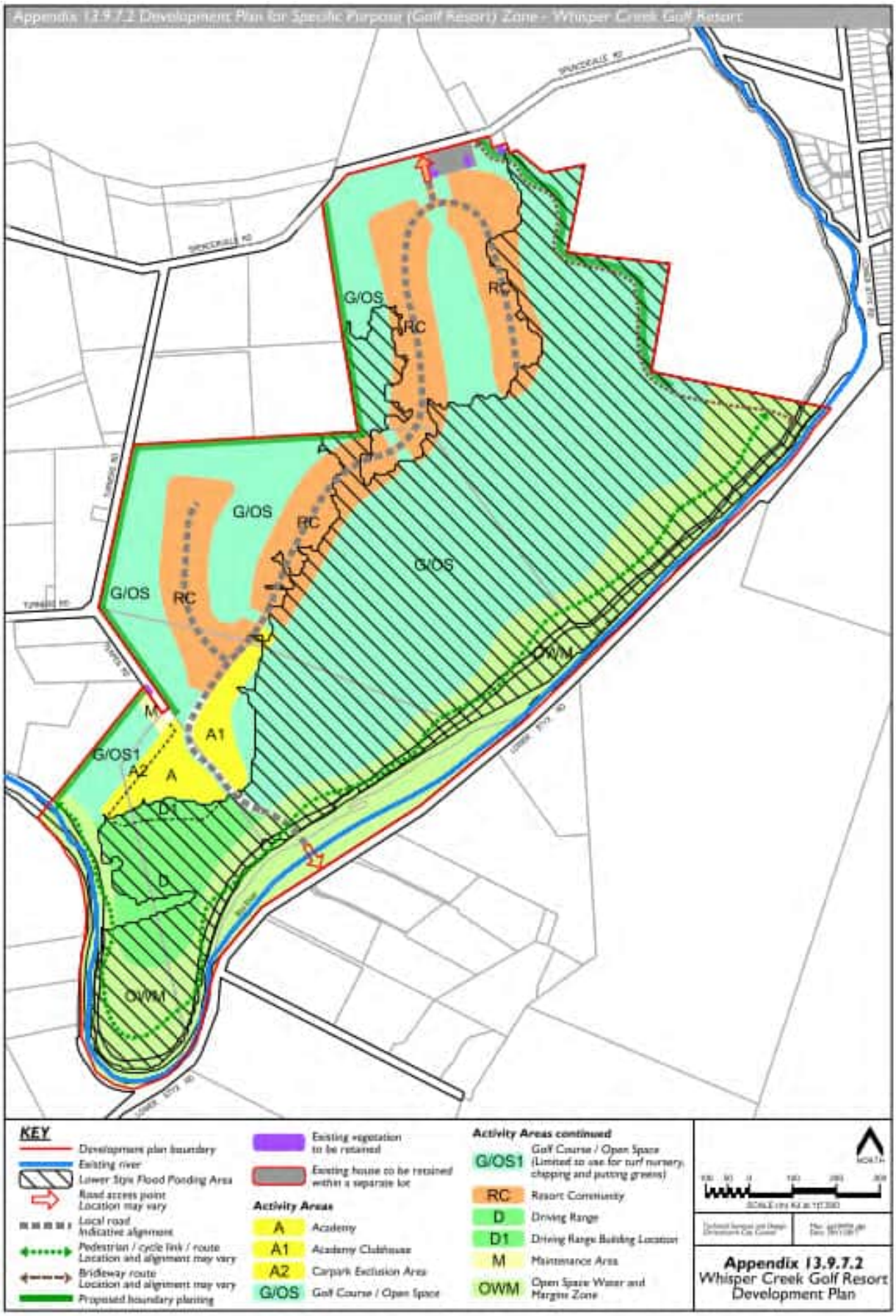



*Figure B. Existing Outline Development Plan for the Golf Resort*

## 2. SITE CONDITIONS

### 2.1. SOILS

The Canterbury Plains consist of intermingled alluvial and glacial fans composed of clays, silts, sands and graded combinations of these soils. Site investigations show a thin layer of topsoil overlying a layer of sand and silt to a depth in excess of 20m.

The soils have the potential to create a very good subgrade to the roads. Scala penetrometer tests have indicated that the minimum bearing capacity of 300kPa is reached at a depth of 500-800mm. Basic site compaction following the topsoil strip is expected to create the required bearing capacities at a shallower depth and meet the requirements of NZS 3604.

### 2.2. GROUNDWATER

The site is located over the unconfined aquifer system. The groundwater table was reached during the site investigations. Please refer to the Geotech report for interpolated and measured groundwater levels.

The Landtech Report provides a description and plan of the depths to groundwater across the development area. Unsurprisingly, the depth to groundwater on the lower terrace is shallow whilst the higher terrace provides for a greater depth. This depth will affect how we develop basins, wetlands and underground services. It is expected that the installation for services will require dewatering. This will entail obtaining the necessary consents from Environment Canterbury. Dewatering consents are common requirements for large-scale subdivision and construction projects and as such there are proven solutions to manage risks to ground water quality.

### 2.3. GEOTECHNICAL ASSESSMENT

An initial geotechnical investigation was undertaken by Tonkin and Taylor Ltd as part of an earlier subdivision application which was not progressed. further investigation was undertaken by Landtech Consulting Ltd for the entire site to inform this plan change application.

The geotechnical investigations have concluded the following:

- There is a low liquefactious potential for a large portion of the site due to the nature of the soils and the level of the groundwater. (TC2)
- There is no Technical Category 3 land within the project area
- Proximity to existing fault lines is not of concern to this development.

Please refer directly to the Geotechnical Reports for detailed information a summary table that best describes the liquefactious nature of the land to be developed, is shown in Fig.C.

| | | |
|---|---|---|
| Project | Address | Turners Road & Spencerville Road, Spencerville, Christchurch |
| | Consenting Authority | Christchurch City Council |
| | Proposed Development | Land zoning plan change |
| | MBIE Technical Category | N/A - Rural and Unmapped |
| | Mapped Liquefaction Vulnerability | Possible |
| Preliminary Liquefaction Analysis & Site Assessment | Modelled vertical land settlement (SLSA) | <5mm to 20mm (TC2) |
| | Modelled vertical land settlement (SLSB) | 5mm to 40mm (TC2) |
| | Modelled vertical land settlement (ULS) | 15mm to 70mm (TC2) |
| | Global lateral movement category | Minor (0mm to 100mm at ULS, TC2) |
| | Lateral stretch category | Minor (0mm to 100mm at ULS, TC2) |
| | Provisional Technical Category and Liquefaction Vulnerability | TC2, Medium |
| | Site Subsoil Classification | Class D - Deep or Soft Soil Sites |
| | Geotechnical Hazard Assessment | Flood Management Area, Subsidence/slippage hazard as per TC2 |
| | Groundwater Depth | Between 0.22m and 1.95m below ground level, with a median groundwater depth of 1.0m. |

*Figure C. Geotechnical Data*

### 2.4. CONTAMINATION ASSESSMENT

A Preliminary Site Investigation in terms of the National Environmental Standards was undertaken by Tonkin and Taylor Ltd in 2017. That report identified potential HAIL activities requiring further investigation at the 240 Spencerville Road address.

A Detailed Site Investigation and Remediation Action Plan was undertaken in 2018 for 240 Spencerville Road by Malloch Environmental.

This report recommends remediation involving excavation and disposal to an approved off-site facility of the contaminated soils. The kerosene and diesel tanks will be removed prior to the issue of title. Removal of the contaminated soil near the existing house would not be required unless there is a new building or the site is being redeveloped.

A third report was commissioned from Sephira Environmental Ltd to carry out a Preliminary Site Investigation to cover the entire development site. That report addressed the following properties:

• 144 Turners Road – Part Lot 30 DP 2773, RS 19765, Lot 29 DP 2773, Lot 2 DP 4047, Lot 1 DP 4047
• 156 Turners Road – Lot 4 DP 76333
• 176 Turners Road – Lot 3 DP 76333
• 174 Spencerville Road – Lot 1 DP 76333

• 220 Spencerville Road – Lot 2 DP 76333
• 240 Spencerville Road – Part Lot 2 DP 5889

That report stipulated the need for a Detailed Site Investigation:
*A Detailed Site Investigation (DSI) with discrete soil sampling will be required to determine whether the HAIL activities have caused significant contamination. Likely contaminants of concern include heavy metals, organochlorine pesticides, organonitrogen pesticides, organophosphorus pesticides, polycyclic aromatic hydrocarbons, petroleum hydrocarbons and asbestos.*

Whilst there appears to be contamination on the site, it is in small amounts and will be dealt with simply by removing it to licenced fills. The site will then be validated as being suitable for both construction activity and residential use.

### 2.5. FLOODING

Please refer to Appendix G for a Flooding Plan describing the various Flood Management Areas, the general contour of the site, and the area outside the Flood Management Area.

Consultation has been carried out with the Council regarding the effects of various flood scenarios on the property. The area is within the Fixed Minimum Floor Level Overlay. This has a minimum required floor level of 12.3m. This level is an accepted standard but modelling undertaken by the Council has set a more robust set of circumstances where the minimum floor level shall be the highest of:

- Flooding predicted to occur in a 0.5% AEP (1 in 200¬-year) rainfall event concurrent with a 5% AEP (1 in 20¬-year) tidal event, including 1 metre sea level rise plus 400mm freeboard, as predicted by the relevant Council model and version identified in Table 5.4.1.1a; or

- Flooding predicted to occur in a 0.5% AEP (1 in 200-year) tidal event concurrent with a 5% (1 in 20-year) rainfall event, including 1m sea level rise plus 400mm freeboard, as predicted by the relevant Council model and version identified in Table 5.4.1.1a; or

- 12.3 metres above Christchurch City Council Drainage Drainage Datum.

The Council flood modelling has determined that the critical flood level is 12.09m and this is the level that will be used on this development. Final flood levels are 400mm higher than this at 12.49m. From this we have determined a minimum building platform level of 12.34m to ensure a standard NZBC foundation designwill achieve a minimum FFL.

Flooding of roads should also be taken into account. The road network will be designed to function as secondary flow paths in high rainfall events, whilst remaining safely navigable by vehicles. As such, road levels below the level of say 12.0 should be avoided in the subdivision design, that being approximately 100mm below the critical flood level.

Further consultation has been undertaken with Council as to the proposed updating of the flood model. The following response has been received.

*"Currently projecting maybe mid-year (*for the model to be completed*), but the calibration on this one is quite complex with the Waimakariri groundwater interactions, so until we're through that obstacle, the timeframe will remain quite unclear. I'd guess that later in the year would be more realistic."*

The potential outcomes from this model cannot be undertaken at this time. Further consideration into flood levels will need to be reviewed but for the purposes of this application the current data is being applied.

There will need to be significant earthworks across the site to ensure that the effects of flooding are mitigated. These earthworks will include the shaping of roads to drain off the site to the river. Additional soil may also be imported to the site or excavated from the lower terrace and used to elevate building sites.

In conclusion, the Council's flood model is, appropriately, based on a number of conservative assumptions relating to a 1 in 200 year rainfall event that coincides with a 1 in 20 year high tide event, that in turn coincides with a 1m increase in sea level, with a further allowance of 400mm freeboard. The compounding effects of these risk assumptions means that a high level of confidence can be placed on the required floor levels being clear of plausible flood events, even with a changing climate. The site is relatively low lying, with the ODP explicitly designed to focus urban development on the upper terrace area where flood risk is reduced. The flood risk across the upper terrace is able to then be effectively managed through first the bulk earthworks undertaken as part of the sub-division/land development phase to lift levels on the upper terrace, and secondly through the design of individual residential unit foundations, to ensure that internal floor levels are elevated above the design flood event. The road corridors will be designed to act as secondary flow paths in high rainfall events, whilst still being navigable by vehicles. Given these design solutions are well-proven and readily achievable, flood risk is not considered to be a barrier that would preclude the rezoning sought through the proposed plan change.

It should also be noted that these levels provided by Council are in terms of the Christchurch Drainage Datum. To be terms of the New Zealand Vertical Datum, a vertical correction of -9.377 needs to be applied fir the levels on this site. This correction has been determined from the levels provided at CCBM42(EHD8) on Lower Styx Road.

- The flood level of 12.09 in CDD is 2.713 in NZVD.
- The Minimum Floor Level is 3.113 in NZVD
- The Minimum Site Level is 2.963 in NZVD
- The Minimum Road Level 2.613 in NZVD

## 3. EARTHWORKS

Earthworks associated with the sub-division will be managed under the usual suite of land use, sub-division, and regional consents. As is standard practice, these consents are expected to include a detailed set of conditions relating to dust management and erosion and sediment control. The basis of the sediment control will be the Environment Canterbury Guidelines and the discharge during construction will be dealt with in association with the overall discharge consent.

Earthworks will be carried out on the site to cut out the roads & basins and fill the low areas on the upper terrace. The intention will be to ensure that the site drains effectively and that all house sites are elevated above flood plains as mentioned in Sec.2.5 of this report. It is proposed that each site will have a building platform area filled to at least 12.34m RL. It is not intended that the whole of each new lot be filled to this level. The minimum floor level is 12.49m in CDD or 3.113 in NZVD.

Please refer to the attached Earthworks Plan in Appendix C that details the general expectation of cut and fill areas outside of the High Flood Hazard Area.

The site is adjacent to a Flood Ponding Area, located on the lower terrace. The site naturally slopes towards this Flood Ponding Area. No earthworks will occur in this area except for the potential excavation to create additional lakes for floodplain volume, the construction of pathways, landscaping and for the creation of naturalised streams and wetlands. There will also be pipework and trenching associated with the operation of these features.

The project will be designed to drain from the house sites directly to the road network and on to the stormwater basins. Any obvious potential flow channel features will be safely directed towards the roads, reserves or other safe secondary flow paths and then on towards the lower terrace and the Styx River. Essentially, the built-up building platforms will be protected from secondary flow.

Additional soils may be imported to the site to improve drainage and flood protection levels.

All topsoil on site will be retained and replaced on the land immediately following bulk earthworks. All disturbed topsoil will be resown with Council specification grass seed mixes. A balance of cut and fill will be maintained on site and removal of material from site will be kept to a minimum.

All bulk filling will be compacted in accordance with NZS 4431:2022. All fill testing will be carried out by an independent laboratory. The maximum depth of fill will be approximately 1.6m. The approximate volume of earthworks will be 260,000m$^3$.

The liquefaction level of the site is considered to be TC2. No specific earthworks treatment is required for the development of the site. The underlying soils are considered suitable for use in bulk earthworks i.e. excavation of soils from the lower terrace to create basins is also appropriate for reuse on the upper terrace as fill for roads and building platforms.

## 4. STORMWATER

It is proposed that all stormwater from the proposed roads and the proposed new lots will drain via sumps and pipework to stormwater treatment and detention areas as shown on the attached plan in Appendix F.

It is proposed that the discharge of stormwater to the Styx River, be allowed under the global consent CRC231955. However, several conditions are to be met to allow discharge under this consent. It is expected that the Council will recommend a "full detention" strategy, which has a primary focus on water quality as well as flood protection.

The proposed development would look to discharge stormwater to existing drainage waterways that connect to the Styx River. The existing waterways are in the form of farm drains.

To provide a better understanding of the natural values of the area and to assist in design of the subdivision the applicant commissioned Viridis to undertake an assessment of the ecological values and restoration options. This report (which is attached to the plan change application) makes the following comments and assessment of the drains on the property:

*Several drainage channels traverse lower elevations of the property, forming a network that channels into the Styx River. The drainage channels are not permanently wet, as is evidenced by the type of vegetation present and comments from the local farmer, and mainly carry water in the winter months. On the banks of the drainage channels there are only occasional, scattered rushes and some sedges and for some stretches of the drainage channels these species are absent. Some common exotic plants that are usually indicative of the site being permanently wet were either absent or present in low numbers.(s4.2.3)*

The range of species that have been recorded in this lowland catchment highlight the values of the Styx River and its tributaries. Although the drainage channels within the project site are manmade and only contain water on a seasonal basis, they are connected to the Styx River and so freshwater fauna could be moving in and out of them and/or be temporarily residing in them, subject to water presence. These waterways could therefore provide seasonal habitat and feeding opportunities for freshwater fauna and could also provide refuge during times when the Styx River is in flood. (s4.6)

To improve water quality in the drainage channels and also the Styx river and to protect the banks of the channels from erosion and stock damage the Vidiris Report recommends that the main drainage channels be fenced and have riparian plantings. They recommend specific species for this planting to achieve shading, nutrient and sediment filtering and to enhance habitat and food sources. The subdivision design utilises the low-lying areas adjoining the subdivision which contain drainage channels by incorporating these into the stormwater treatment and detention facilities. The design importantly creates additional wetland habitat for filtering of stormwater, using the wetland species recommended in the Vidiris report.

The overall stormwater strategy is outlined below, please refer to the Stormwater Plan included in Appendix F:

- The discharge will be to the existing drain (Spencers Drain) shown on the plan just to the east of the development. The levels of the basin and wetland will be determined from this existing drain level and the Flood Ponding model. The Catchment E Stormwater Facility

may drain directly to the Styx River.

- Capture the 25 mm first flush (FF) volume in a dry sedimentation basin.
- Runoff Coefficient of 0.63 used for the development for First Flush. Equivalent to an RNN zone.
- Design the FF basin to discharge to wetland over 4 days for further treatment
- Use the CCC Simplistic Method for Wetland Sizing with 250 mm average static water depth to determine the wetland area
- Design the wetland to fill by 500 mm depth in a 50-year ARI, 48-hour event
- All other excess flows for this critical event are to be stored on site and released at pre-development rates.

Calculations following the design criteria are included in Appendix F, and summarised below.

- Total catchment area 83.05ha being the majority of the development area.
- First flush basin volume of 13080 $m^3$ required
- Area of wetland required is 17440$m^2$
- Overall storage required = 53597 $m^3$

A calculation was also undertaken to determine the critical duration event for the receiving Spencers Drain. The drain connects to the Styx River approximately 3km to the north of the site. The grade is very flat and has been estimated to have 0.5m fall over its length. This gave a time of concentration of 172 minutes. At this duration the additional storage required in the development is approximately 25000$m^3$. Well below the volume being provided and therefore of no adverse effect on the water levels in the Drain or Styx River is expected.

It is proposed that the Whisper Creek development will include filling within the Flood Management Area. For the purposes of proving to CCC that the proposed sites at Whisper Creek can be formed within the criteria of the Natural Hazards Section of the District Plan, please refer to the attached Flooding Plan.

- The area outside the Flood Management Area is shaded green
- The Flood Management Area boundary is shown as a Blue line
- The Flood Ponding Management Area boundary is shown as a Green line
- The High Flood Hazard Management Area boundary is shown as a Red line

The flood level used in these calculations is 2.713 in NZVD. This level has been confirmed with council as the 1 in 200 year critical event. The Final Floor levels are 400mm higher than this at 3.113. From this we have determined a building platform level of 2.963 NZVD. To achieve these safe building platform levels, the site will require filling.

Filling will occur outside of the Flood Ponding Management Area, but within the Flood Management Area. Excavations for basins will occur within the Flood Ponding Management Area but outside of the High Flood Hazard Management Area.

The only works in the High Flood Hazard Management Area will be associated with the naturalisation of drains and wetlands. The flood volume of the High Hazard Management Area will not be reduced.

## 5. ROADING

Please refer to the Integrated Transport Assessment in the Application. This assessment has been compiled by Novo Group and addresses the effects of the proposal on the surround existing Transport routes and intersections.

Access into the site will initially be off Spencerville Road. Spencerville Road is described in the District Plan as a Collector Route but is very much of a rural nature. The road reserve width is 20.12m but the seal formation is approximately 6m. There is no kerb and channel or footpath.

It is proposed that there will be one intersection onto Spencerville Road. The intersection is on a relatively straight section of Spencerville Road with a minimum sight distance of 150m.

As the development progresses, there will be access onto Teapes Road and Turners Road. Both roads are similar in nature to Spencerville Road.

All three roads at this location are in an 60km/hr speed zone. It is not expected that this will change. Travel speeds within the development will be restricted to 50kph.

There is no direct access to any proposed new house sites from any of the three existing roads. All access to the new homes will be internal top the development.

The transport modelling indicates that the majority of new traffic generated, will use Turners road as access to Marshlands Road and beyond. A lesser amount of traffic will be added to Spencerville Road heading west and very little traffic will be added to Spencerville Road heading east.

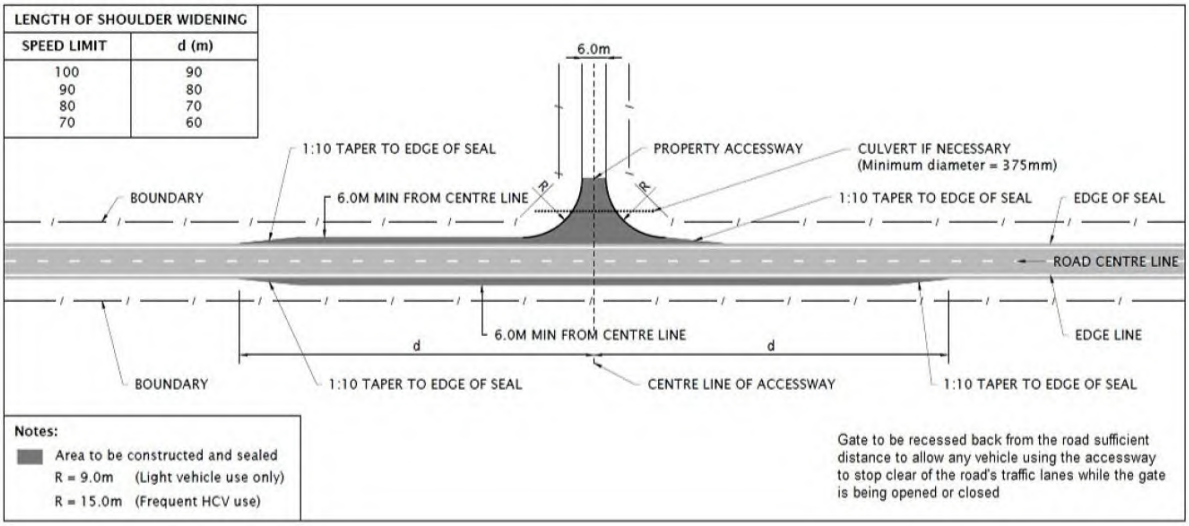
As a result of the added traffic, it is expected that there will need to be a series of upgrades required to the existing road network:

- Upgrade Turners Road from Spencerville Road to Marshlands Road to 7m sealed width.
- Upgrade Teapes Road to 6.5m sealed width.
- Upgrade the Turners Road/Teapes Road intersection to a standard tee arrangement.
- Upgrade the Turners Roads/Marshlands Road intersection with an additional turning lane on Turners Road.

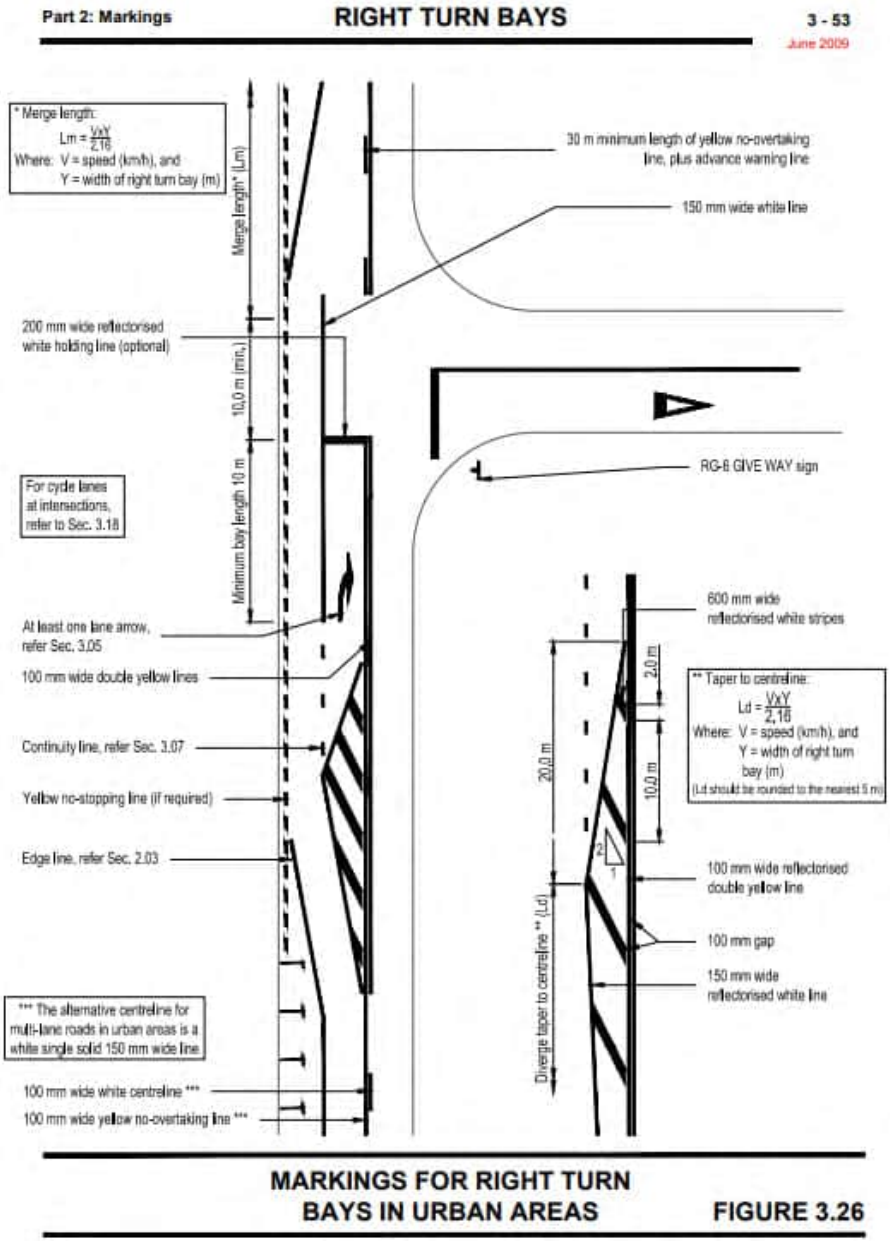
In addition to this, the local pedestrian/cycling network will be extended with:

- a shared path from the development area to the Ouruhia Model School via the Styx Mill Conservation Loop and a short length on Turners Road.
- A shared path along Lower Styx Road linking the site to Te Korari St.

It is proposed that the intersection of the Development Road onto Turners Road will comply with Figure 14 in Appendix 7.5.10 of the Christchurch District Plan. Please refer to the following diagram.




It is proposed that the intersection of Road 1 onto Spencerville Road will comply with MOTSAM Part 2, Figure 3.26. Please refer to the following diagram.



The roads within the proposed development will be compliant with the urban streets dictated in the District Plan and the Proposed Outline Development Plan. A sealed footpath will be located on both sides of the carriageway with street trees lining both sides of the roads.

Please refer to the appendices for typical road cross sections in Appendix D.

The entrance into the development off Spencerville Road will pass between two large mature trees and will extend through the development as a collector route, past the commercial area, and connecting to Turners Road. Another collector road will connect from the commercial and community area to the end of Teapes Road. These roads will provide the vehicular spine to the development. All other roads connect to these main routes.

Private access and rights of way will be constructed to Council standards.

Pedestrian/Cycle access through the development will be provided by footpaths along the roads and through the connecting reserves. The network of pedestrian and cycle routes through the site and into the region is set out in the reports on Transport and urban design matters.

Proposed lighting includes lights at roads, intersections, cul de sac heads, and lighting along the pedestrian routes. The intersections onto existing roads will be lit to Council Standards.

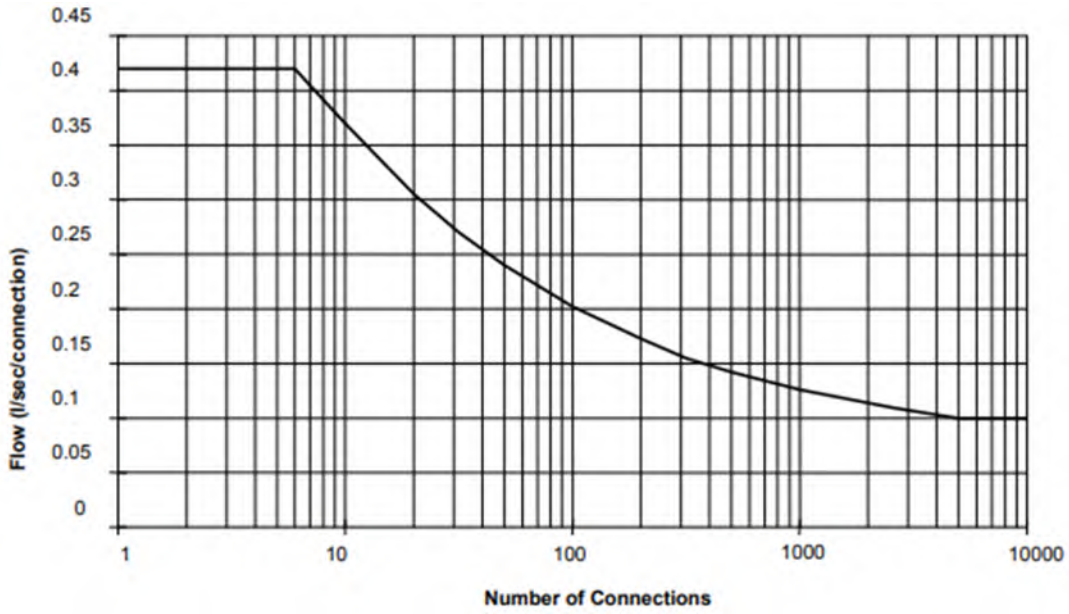
All runoff from the roads up to and including a 1 in 50 year storm event will be treated, attenuated and disposed of on site in accordance with the proposed stormwater concepts in sections 3 and 4.

All pavements will be designed and constructed to Council Standards.

## 6. WATER SUPPLY

The water supply demand for the proposed 800 lot residential development can easily be determined from a calculation derived from the Council's Infrastructure Design Standard.

**Water Supply demand calculated using the CCC IDS**




| | | |
|---|---|---|
| 800 connections equates to a peak flow rate of 0.135l/s/connection | 108 | l/s |
| The proposed development will have a Fire Classification of FW2 | 25 | l//s |
| Small Commercial Area | 3 | l/s |
| Total peak flow | 136 | l/s |
| | | |
| Daily Demand is determined from each site using 3000l/day | | |
| Total daily Demand | 2400 | $m^3$ |
| Average flow | 27.78 | l/s |

This calculation has been checked against a daily demand of 3000 l/hh and appears to be feasible.

Consultation has been undertaken with Council Engineer – Michele McDonald. Her advice is as follows:

*"the existing Brooklands / Kainga WSZ does not have capacity to service the proposed Whisper Creek Plan Change request. I would also like to caution that the solution is not simply, the addition of a new well, especially because:*

- *An increased demand at the closest PS will likely trigger the need to upgrade the DN200 in Lower Styx Road to comply with IDS head loss requirements*
- *A new well abstraction consent will be required – a deep well to be drilled to avoid risk of nitrates*

- *Drinking water quality compliance rules require achievement of a bacteriological barrier and which necessitates the introduction of suction tanks at new 'treatment' sites to achieve adequate chlorine contact time*
- *Drinking water quality compliance necessitates that that new sites be developed as comprehensive 'treatment' sites complete with buildings to house treatment facilities"*

Additional advice from Council suggests that a new treatment plant and pump station will need to be designed at 2/3 peak flow + FW2 (25l/s) and that the argument can be made that peak flow for a treatment plant could be sized at 0.05 l/s per property (as per current peak factor after reduction due to excess charges as opposed to 0.113 l/s in 2019). For 800 lots, this equates to a peak domestic flow of = 40 l/s. Two thirds of 40 + 25 = 51.7 l/s.

Please refer to Appendix A for the full consultation.

In effect, the Council have confirmed that a new well and treatment plant will be required. Essentially the development will be serviced as an individual development. The estimated cost of this facility is approximately $10M. The facility will be constructed to Council Standards and then vested.

The facility will include for a bore, treatment plant, storage and pumping. The storage volume will be reliant on the potential abstraction rates that can only be determined at the time of drilling. There is an existing significant bore on site – M35/10558. This bore does not have a water permit but was installed as part of the Golf Resort project and had a drawdown test as follows:

| STEP TEST DATE | STEP | YIELD (L/S) | YIELD (GPM) | DRAWDOWN (M) |
|---|---|---|---|---|
| 20 Jul 2009 | 1 | 14.8505278 | 196 | 1.22 |
| 20 Jul 2009 | 2 | 20.07852 | 265 | 1.79 |
| 20 Jul 2009 | 3 | 25.00344 | 330 | 2.39 |
| 20 Jul 2009 | 4 | 30.68604 | 405 | 3.1 |
| 20 Jul 2009 | 5 | 38.4901428 | 507.999969 | 4.22 |

From these simple results, there appears to be sufficient underlying water but still some way off the 51.7l/s required to avoid having to provide a fire fighting reserve reservoir.

An extension of this existing bore may be considered but it is in the flood plain and as a result of the potential inundation of the bore head, it is expected that a new bore will be installed on a site away from the floodplain. The likely location will be central to the development, adjacent to the commercial and community area. Verification of the true yields can only be obtained from testing a new well.

From the new water supply plant, mains will radiate into the roading network and the development will be fully reticulated. All new residential sites will be serviced by a 63mmø submain, laid along the berms of the streets.

The water supply network will be fully modelled and designed in compliance with Council specifications and SNZ PAS 4509:2008, New Zealand Fire Service Fire Fighting Water Supplies Code of Practice. The firefighting water supply classification will be FW2.

In conclusion, there is no existing potable water capacity in the wider network, and therefore the site will need to provide its own solution to water supply in terms of both volume and quality. The proposed solution is to sink a new bore of sufficient depth to manage water quality risks. On-site treatment is now required for all community drinking water supply schemes, with an on-site treatment and chlorination plant also proposed. The creation of new bores and associated treatment plants are able to draw on proven solutions and common technology. As such, the provision of a suitable potable water supply is considered to be plausible and does not present a barrier to the site being rezoned.

## 7. SEWER

It is proposed that all wastewater generated by the development will be connected to the Council's reticulated network and Bromley wastewater treatment plant. As such there will be no use of on-site treatment for the new development.

An estimate of the wastewater to be created by the proposed 800 lot development is calculated from Infrastructure Design Standard Methodologies.

**Wastewater Demand calculated using the CCC IDS**

ASF = number of lots x 220 ℓ/person/day x 2.7 persons/lot
= 200 lots x 220 ℓ/person/day x 2.7 persons/lot
= 118,800 ℓ/day
= 1.38 ℓ/s

MF = 1.8 x 2.78 x 1.38 ℓ/s
= 6.88 ℓ/s

| | | | |
|---|---|---|---|
| ASF | 475200 | l/day | |
| | 5.50 | l/s | |
| | | | |
| MF | 27.52 | l/s | |
| add Commercial area | 2.16 | l/s | 1 l/1000 residents |
| Total MF | 29.68 | l/s | |

It is proposed that the development will be serviced by a Local Pressure Sewer Network. This system has been selected primarily due to the high groundwater. Each new home will have a simplex pump and tank. These will be installed at the time of building consent and will not be part of the subdivision process. A consent notice on the title is expected to detail this. Each site will pump to a common rising main. The rising mains will be installed in the street berms and will connect as a network, progressively getting larger in diameter and flow, and finally culminating at the entrance to the development at Spencerville Road.

A rising trunk sewer will be laid along Spencerville Road, over the bridge, and then along Lower Styx Road to discharge into either the existing 300mm ø wastewater pipe located at the intersection of Lower Styx Road and Spencerville Road (MH20228), or CCC Pump Station WwStation: PS0078 Heyders WW in Heyders Road, Spencerville. Please refer to the attached plan in Appendix E.

There is some expectation that existing the 300mm pipe in Lower Styx Road may be able to accommodate the site flows, as the current capacity of the pipe is approximately 60l/s at 80% of full bore. The Red Zoning of the upstream village of Brooklands after the earthquakes will have

assisted in providing spare capacity in the network. Some analysis and monitoring will be required to assess what the actual available capacity may be.

The use of a Local Pressure System has the ability to attenuate flows at peak times and even out the peak demand. The lesser peak flow will be determined at detailed design stage but it is generally expected that the flow will be approximately 14.85 l/s. The trunk sewer to be laid in Spencerville Road is expected to be a 125 – 180mm (OD) PE100 PN16 pipe.

Consultation has been carried out with the Council as to the capacity of the Heyders Rd Pump Station 78. Council commissioned a modelling report as detailed in Appendix B

The modelling concluded that:

*There are no predicted surcharge or overflow issues for the Whisper Creek development.*

*However, with the addition of the development, the downstream pump station PS78 is predicted to be at capacity. Because of this and because PS78 is operating at a pump rate of 29.95 L/s which is significantly below its original design capacity of 40 L/s, the development would trigger the need for proactive maintenance to recover the pump station performance to the design flow rate.*

As part of the development of the site, the applicant will undertake maintenance on the rising main and it is expected that there may also need to be an upgrade of the pumping.

Odour Control will also need to be installed at the discharge point at MH WwAccess20228. The treatment will be installed and located in the road berm. Care will be taken to ensure that the odour control will not be inundated by flood events. It is also expected that MH WwAccess20228 will need to be lined for corrosion protection.

In conclusion, all wastewater will be reticulated to the Council's network and associated wastewater treatment plant. The local network has sufficient capacity (with modest upgrades/ pump station maintenance) to take the additional flows generated by the development.

## 8. POWER/TELEPHONE/STREET LIGHTS

Power and Telephone will be provided to all sites within the plan change to utility company and industry standards. All cables will be placed underground and all kiosks will be constructed on separate individual lots. The kiosk sites will be forwarded to Council for approval following the power design.

Existing power connections to the site will be incorporated into the proposed power design.

Street lights will be provided to the roading and reserves to Council standards or as previously described in this report. The applicant will also provide a street light style to the Council for approval.

## 9. CONCLUSION

**Stormwater** – Stormwater from any proposed development will be stored and treated on site in accordance with City Council Global Discharge consents.

**Water Supply** – A new bore and reticulated network will be installed on site along with suitable treatment to service the development.

**Wastewater** – All wastewater from the proposed development will be pumped to Pump Station 78 at Heyders Road in Spencerville. Upgrades will be required at Pump Station 78.

**Roading** – All proposed roading within the development will be constructed to District Plan standards. The surrounding existing road/cycle/pedestrian network will be upgraded to accommodate the additional demands on the proposed development.

Whilst upgrades are necessary to wastewater and potable water networks, these solutions are common for new development areas and as such these 2 waters do not present a barrier to rezoning. Stormwater and flood water management will require bulk earthworks, with development focussed on the upper terrace and stormwater attenuation and treatment focused on the lower terrace, along with associated opportunities for wetland restoration and ecological enhancement.

As such, the site is able to be serviced in line with the development enabled through the proposed plan change.

**Appendix A – Water Supply Consultation with Council**

## Andy Hall

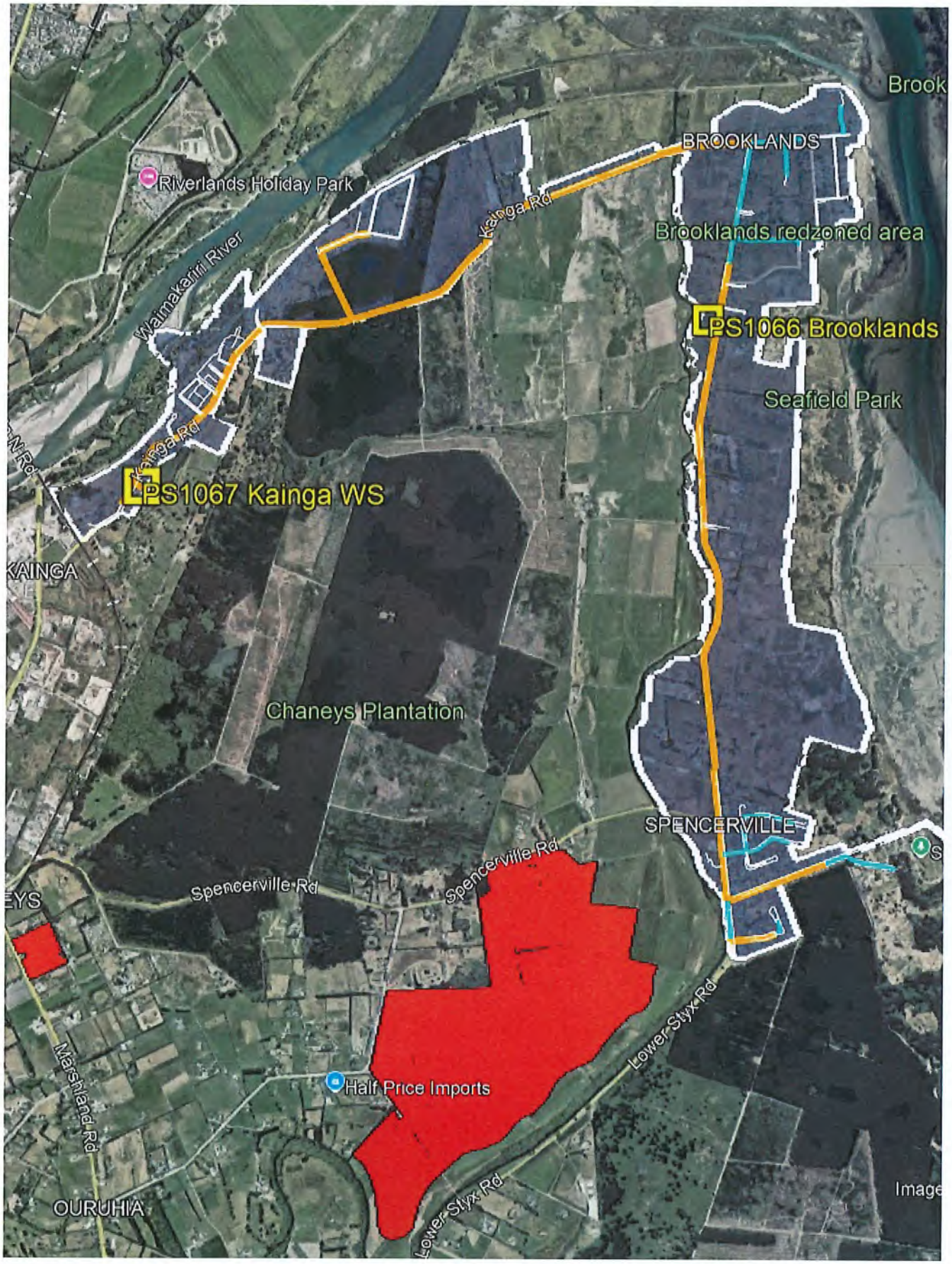
**From:** McDonald, Michele <Michele.McDonald@ccc.govt.nz>
**Sent:** Wednesday, 12 February 2025 1:40 pm
**To:** Andy Hall
**Cc:** Lightbody, Kirk; Ross Moffatt
**Subject:** RE: Water Supply Whisper Creek Plan Change

Dear Andy

I agree with you re growth...but this is what has been modelled for the LTP as based on Census growth projections. As noted, I am not too concerned about the future growth projections, especially since this is not the reason for the lack of capacity.

See below the highlighted Brooklands / Kainga WSZ with the location of the existing pump stations or rather 'treatment plants' shown as well.

Development Contributions are based on growth projects in the LTP and since the development of adequate capacity for this plan change request is not replacing an existing LTP project, DC's will still be payable – that said, I would imagine that a case could be made that this development does not fall in or connect to an existing DC catchment, and hence why it must build its own capacity. Please keep in mind that approval for this does not lie with me, or the Three Waters Unit and will have to be routed through the DC team.


Brook
BROOKLANDS
Riverlands Holiday Park
Kainga Rd
Brooklands redzoned area
Waimakariri River
PS1066 Brooklands
Seafield Park
Kainga Rd
PS1067 Kainga WS
KAINGA
Chaneys Plantation
SPENCERVILLE
Spencerville Rd
Spencerville Rd
Lower Styx Rd
Marshland Rd
Half Price Imports
Lower Styx Rd
OURUHIA
Image

Regards

**Michele McDonald**
**Team Leader Asset Planning WWW**
Asset Planning - Water & Wastewater

03 941 8131
Michele.McDonald@ccc.govt.nz
Te Hononga Civic Offices, 53 Hereford Street, Christchurch
PO Box 73014, Christchurch 8154
ccc.govt.nz

Christchurch City Council

**From:** Andy Hall <Andy.Hall@dls.co.nz>
**Sent:** Wednesday, 12 February 2025 12:51 pm
**To:** McDonald, Michele <Michele.McDonald@ccc.govt.nz>
**Cc:** Lightbody, Kirk <Kirk.Lightbody@ccc.govt.nz>; Ross Moffatt <Ross.Moffatt@xtra.co.nz>
**Subject:** RE: Water Supply Whisper Creek Plan Change

Great
I'm surprised that we are going back to Brooklands – are you sure about this? The area is Red zone (recovery zone)
The DCs out there are only $647.26incl GST. This suggests that there is very little in the LTP for this growth.
Couple of things though:

1. Can you send me the Water Supply Zone for this area
2. Can you confirm that if we were to install a new well etc, that the DCs would not be payable?

Sorry to keep on – you know what I'm like.

Regards

**Andy Hall** | Engineering Director

DAVIE LOVELL-SMITH
PLANNING SURVEYING ENGINEERING

*116 Wrights Road, Addington, Christchurch | P (03) 379 0793 | M 021 663 856 | www.dls.co.nz*

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**From:** McDonald, Michele <Michele.McDonald@ccc.govt.nz>
**Sent:** Wednesday, 12 February 2025 8:30 am
**To:** Andy Hall <Andy.Hall@dls.co.nz>
**Cc:** Lightbody, Kirk <Kirk.Lightbody@ccc.govt.nz>; Ross Moffatt <Ross.Moffatt@xtra.co.nz>
**Subject:** RE: Water Supply Whisper Creek Plan Change

Dear Andy

The growth is predicted for the Kainga Brooklands WSZ and granted that this development could encompass the growth component – the fact remains that existing capacity is insufficient – the graph

simply confirms why there is no funding allocated in the LTP for additional capacity as there is no need for next say 15 years.

Given that the existing PS (or treatment plant) is about 4km away from the site and will need similar upgrades + would trigger the need for an increased water supply main at 4km, it will likely be more cost-effective to design and construct a new treatment plant for this development. Given the yield of the existing bore, and in consideration of the peak demand, an additional well will be needed. Note, that a new treatment plant (aka pump station) will need to be designed at 2/3 peak flow + FW2 and that the argument can be made that peak flow for a treatment plant could be sized at 0.05 L/s per property (as per current peak factor after reduction due to excess charges as opposed to 0.113 L/s in 2019) = 35 L/s and 2/3 of 35 + 25 = 48 L/s. Best would be to get a concept sized and priced up in the context of meeting the CCC minimum requirements, as directed by the DWQAR. Discussions on the plan change would then also have to consider the method of delivery i.e. IPA vs Council delivered with developer financial contribution.

Regards

**Michele McDonald**
**Team Leader Asset Planning WWW**
Asset Planning - Water & Wastewater

03 941 8131
Michele.McDonald@ccc.govt.nz
Te Hononga Civic Offices, 53 Hereford Street, Christchurch
PO Box 73014, Christchurch 8154
ccc.govt.nz

Christchurch City Council

**From:** Andy Hall <Andy.Hall@dls.co.nz>
**Sent:** Wednesday, 12 February 2025 7:35 am
**To:** McDonald, Michele <Michele.McDonald@ccc.govt.nz>
**Cc:** Lightbody, Kirk <Kirk.Lightbody@ccc.govt.nz>; Ross Moffatt <Ross.Moffatt@xtra.co.nz>
**Subject:** RE: Water Supply Whisper Creek Plan Change

Cripes
That's not good for the heart.
The upward trend of usage looks to be based on residential growth – where is that growth geographically?
Also, we have a 300mm bore on site at about 90m. No consent to take but a drawdown test looked pretty good.

| STEP TEST DATE | STEP | YIELD (L/S) | YIELD (GPM) | DRAWDOWN (M) |
|---|---|---|---|---|
| 20 Jul 2009 | 1 | 14.8505278 | 196 | 1.22 |
| 20 Jul 2009 | 2 | 20.07852 | 265 | 1.79 |
| 20 Jul 2009 | 3 | 25.00344 | 330 | 2.39 |
| 20 Jul 2009 | 4 | 30.68604 | 405 | 3.1 |
| 20 Jul 2009 | 5 | 38.4901428 | 507.999969 | 4.22 |

If a new well were to be installed here, could we pipe it to the treatment plant and back?
Is the treatment plant relatively simple to upgrade? Is it modular?

Consents, pipes and upgrade would be on the developer of course.

Cheers

**Andy Hall** | Engineering Director

DAVIE LOVELL-SMITH
PLANNING SURVEYING ENGINEERING

*116 Wrights Road, Addington, Christchurch | P (03) 379 0793 | M 021 663 856 | www.dls.co.nz*

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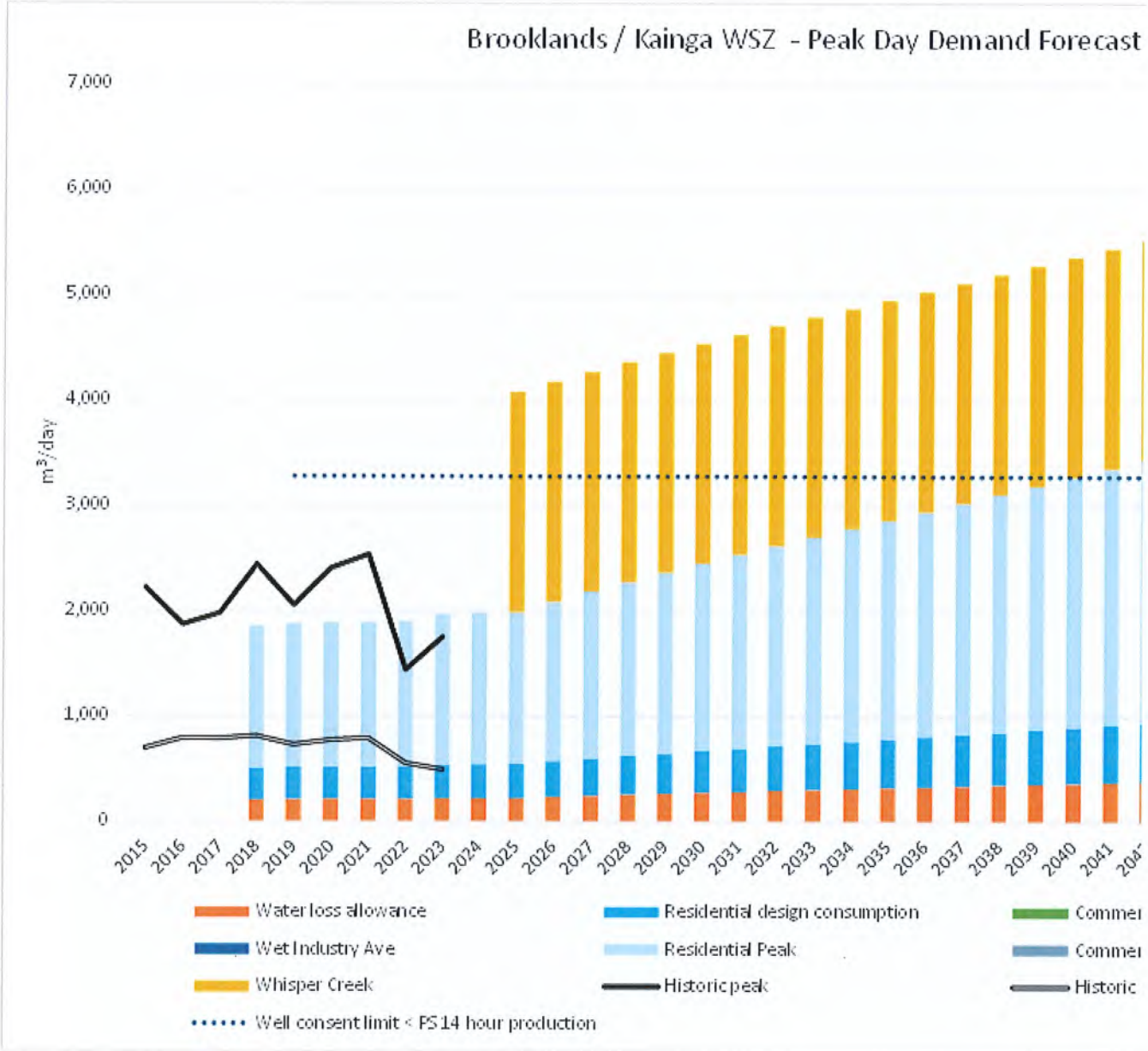
**From:** McDonald, Michele <Michele.McDonald@ccc.govt.nz>
**Sent:** Tuesday, 11 February 2025 3:21 pm
**To:** Andy Hall <Andy.Hall@dls.co.nz>
**Cc:** Lightbody, Kirk <Kirk.Lightbody@ccc.govt.nz>
**Subject:** Water Supply Whisper Creek Plan Change

Dear Andy

Please find below confirmation of the fact that the existing Brooklands / Kainga WSZ does not have capacity to service the proposed Whisper Creek Plan Change request. I would also like to caution that the solution is not simply, the addition of a new well, especially because:

- An increased demand at the closest PS will likely trigger the need to upgrade the DN200 in Lower Styx Road to comply with IDS head loss requirements
- A new well abstraction consent will be required – a deep well to be drilled to avoid risk of nitrates
- Drinking water quality compliance rules require achievement of a bacteriological barrier and which necessitates the introduction of suction tanks at new 'treatment' sites to achieve adequate chlorine contact time
- Drinking water quality compliance necessitates that that new sites be developed as comprehensive 'treatment' sites complete with buildings to house treatment facilities

Our rough order planning estimate for a new PS site supplied by 1 well (excluding land) is $10 million. The current LTP does not provide funding for increased water supply capacity of the Brooklands / Kainga WSZ.


Brooklands / Kainga WSZ - Peak Day Demand Forecast
7,000
6,000
5,000
4,000
3,000
2,000
1,000
0
m³/day
2015
2016
2017
2018
2019
2020
2021
2022
2023
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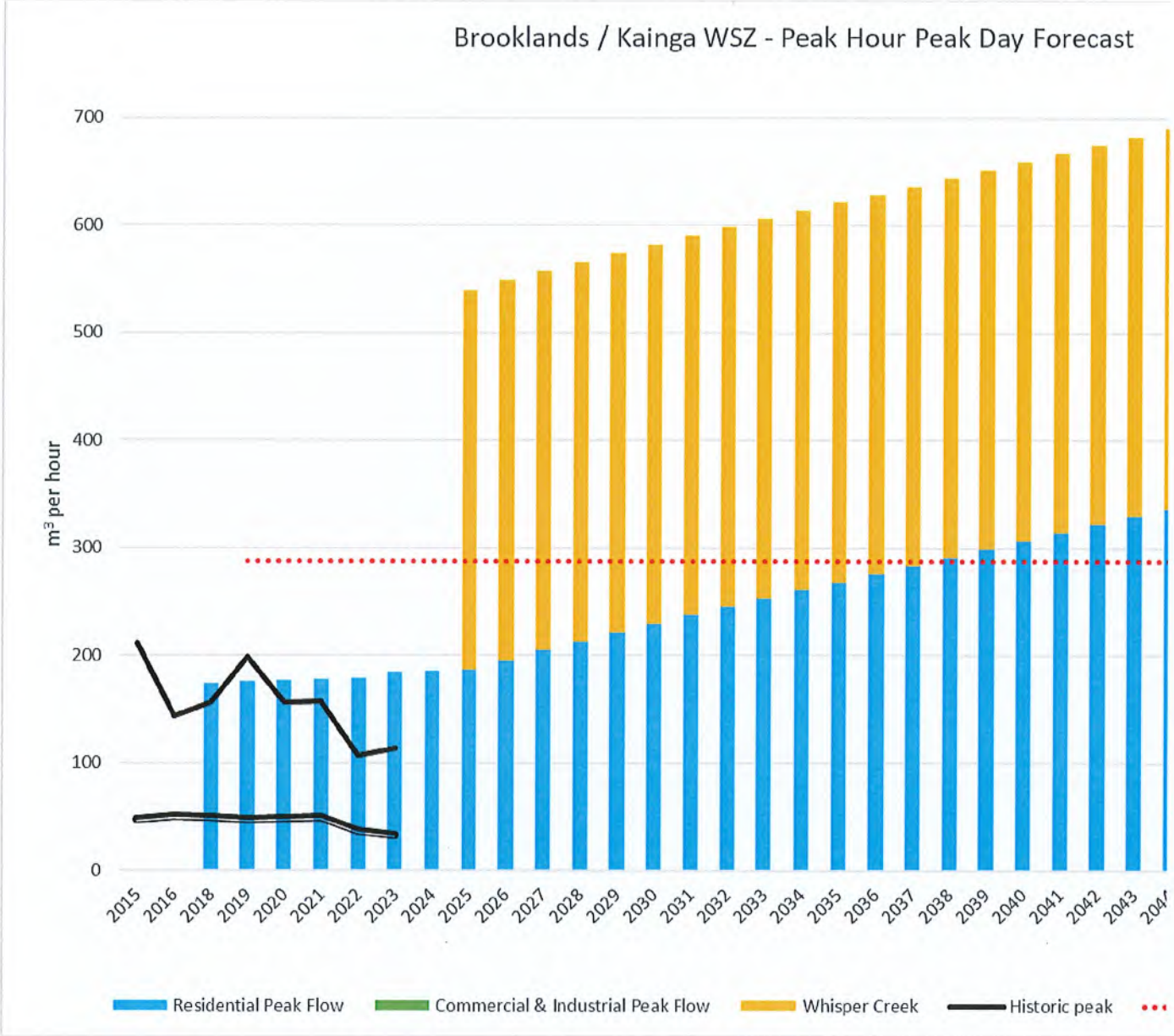
2040
2041
Water loss allowance
Residential design consumption
Wet Industry Ave
Residential Peak
Whisper Creek
Historic peak
Well consent limit < PS 14 hour production




Regards


## Michele McDonald

**Team Leader Asset Planning WWW**
Asset Planning - Water & Wastewater

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Michele.McDonald@ccc.govt.nz

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Christchurch City Council

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**Appendix B – Wastewater Modelling Memo**

MEMORANDUM

| | |
|---|---|
| *To* | Michele McDonald, David Ripley |
| *Copy* | Sue Harrison (WSP) |
| *From* | Lucy Gray, Kelsey van der Schyff, Charlotte Mills |
| *Office* | Christchurch |
| *Date* | 13 March 2025 |
| *File/Ref* | 3-CHDM1.05 / 00012 |
| *Subject* | Plan Change Query - Whisper Creek |

# 1. Introduction

Christchurch City Council (Council) engaged WSP to model the impact on the wastewater network for a proposed plan change at Whisper Creek Golf Resort from Specific Purpose (Golf Resort) Zone to Residential New Neighbourhood. Council provided the following information for this investigation:

- The development is to be an 800-unit residential development discharging to the existing manhole WwAccess20228.
- The development will be a local pressure sewer (LPS) system with a maximum flow (MF) of 14.85 L/s, based on a storm peak factor (SPF) of 1.5.
- The pump station downstream of the development, PS0078 Heyders WW, is to be updated with the drawdown test pump rate of 29.95 L/s in the base model.

# 2. Modelling

## 2.1 Assumptions, Uncertainties, and Limitations

### *General*

- This assessment was performed using InfoWorks ICM v2024.5.1, using the existing 2020 wastewater model[1]. Only the existing model (2020 Model – Version 925) was used. It is assumed that this model is suitable for this assessment.

  More details with regards to this model can be found in the ***Christchurch City Wastewater Model: Model Update and Calibration Report*** (WSP, 2020)

  The model is predominantly a trunk main model. Hence, pipes smaller than DN 225 are generally not included in the model, unless this would cause connectivity issues. Additionally, subcatchments

[1] WSP model reference: dcapa500app57:40000/CCC 2019 InfoNet

in this model can be quite large and are not split up by each manhole. If required during development queries, pipes smaller than DN 225 can be added to the model and large subcatchments can be split up to better reflect the flow distributions in the area.

- Pump stations are modelled using a “screw pump”. The modelled pump operates continuously with the discharge rate matching the incoming flow up to the maximum possible pump rate, as opposed to start-stop operation. This method reduces model run times but may lead to under predictions of peak flows downstream.
- For wet weather flow (WWF), the design event used is the 2024 design storm generated from the Long Time Series (LTS) analysis. See the report ***Christchurch City Council 2024 Design Storm Review*** (WCS, August 2024) for more information.
- The impact of the development was assessed using the 2024 design event. However, a variety of storm events would be necessary to fully understand the impact of WWF on the network. Variables to consider include the annual exceedance probability (AEP), intensity, duration, and timing of the event with respect to flow patterns in the network.
- The wastewater network model has both a Base Model and a Growth Model. The base model represents the current network and flow inputs. The Growth Model has committed network and growth changes included in addition to the Base Model.

  More information on the creation of the Growth Model can be found in ***Christchurch City Wastewater Model - Updated Growth Model Report (Council Ref CPMS#51866*** (WSP, 2020)***)***. In summary, the Growth Model differs from the Base Model through the inclusion of the following:

  - City wide population uplift using Stats NZ 2013 Meshblocks with Council calculated 2041 populations, adjusted to a 2068 population.
  - Identified population growth areas from 2016 with either lot density or number of lots.
  - Large industrial / commercial areas:
    - Christchurch Airport
    - Dakota Park, Memorial Avenue Investments Ltd (MAIL) and North West Review Area 3 (NWRA3)
    - Ravensdown
    - East Frame (mixed use)
    - Riccarton Park (mixed use)
  - Additional industrial / commercial areas modelling using the ***Infrastructure Design Standards, Part 6*** (Christchurch City Council, 2022)

*Scenario Specific*

- The nearest flow monitor for the area is STFM31, which is located just upstream of PS78. A good level of calibration was achieved against data between August 2018 and November 2018. See the 2020 calibration report ***Christchurch City Wastewater Model: Model Update and Calibration Report*** (WSP, 2020).
- No growth scenarios have been included in this assessment.
- Since we are not assessing this development during dry weather, we will apply the maximum flow (peak wet weather flow) from the development as a constant discharge.

## 2.2 Methodology

The following methodology was undertaken:

1. We updated the base model to include the new drawdown test pump rate for PS78 of 29.95 L/s, as provided by Council.
2. We created a new scenario for the development using the updated base model:

(a) A new subcatchment representing the development was created in the same rough location as indicted in the master plan sent by Council—see Figure 2-1.
(b) The development subcatchment was set to discharge to the existing manhole WwAccess20228.
(c) We applied the maximum flow of 14.85 L/s as a constant discharge since we are not assessing the development impact during dry weather.

3 We ran both the base model and development scenario during wet weather flow.

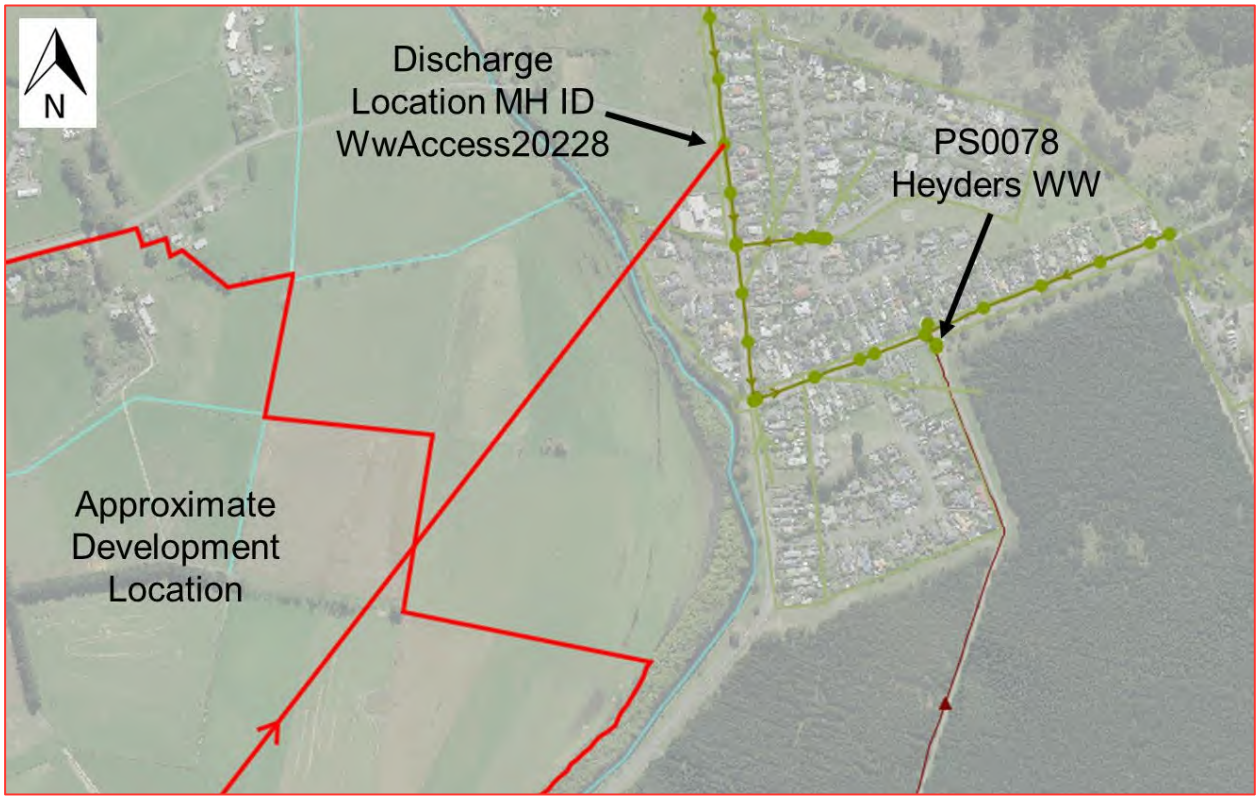



*Figure 2-1: Development location.*

# 3. Results

Figure 3-1 shows the long section results between the discharge location (WwAccess20228) and PS78.

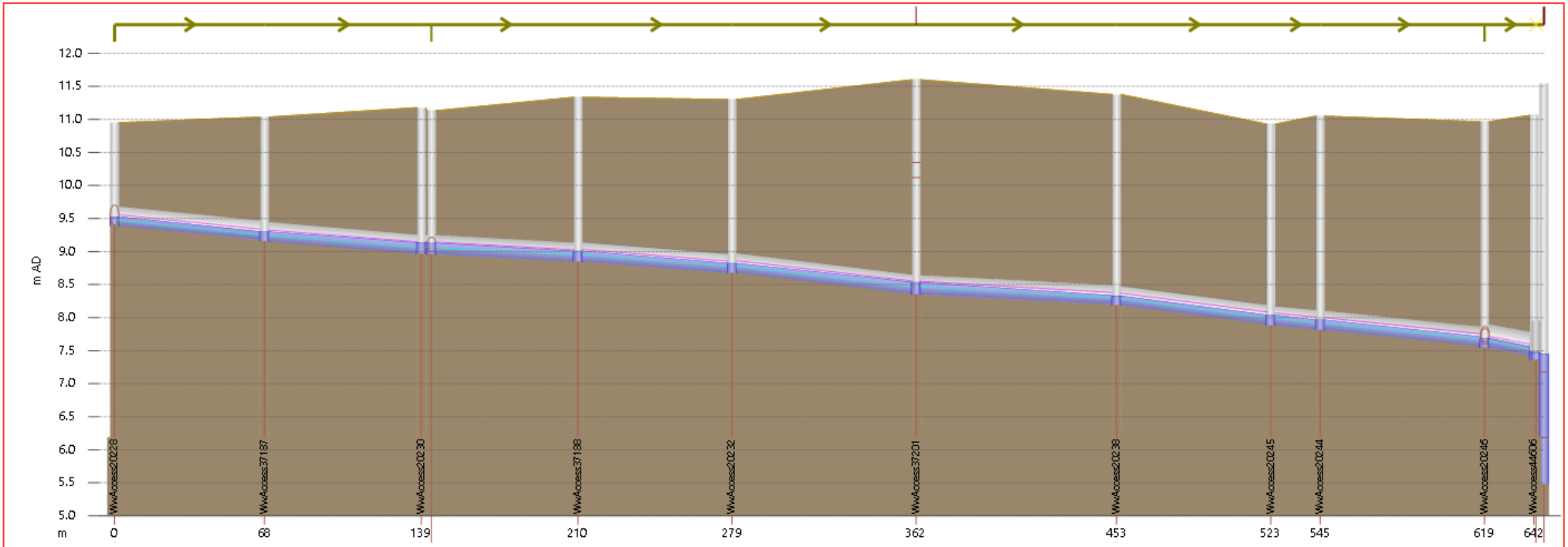
The model predicts that the system has sufficient capacity for the proposed development. There is no predicted surcharge in the long section and no increase in predicted spills at manholes and constructed overflows due to the development.

However, with the addition of the development, the downstream pump station PS78 is at its capacity. The predicted inflow to PS78 is 30.8 L/s, which is just over its tested capacity of 29.95 L/s.

The SCIRT detailed design report (SCIRT, 13 Oct 2014) states the design flow rate for the pump station is 40 L/s. The report also states that deterioration in hydraulic performance could be caused by a build-up in slime and sediment in the dual rising mains. If the development were to be progressed, proactive maintenance of the pump station and rising mains would be needed to recover the pump station performance to the design flow rate.

Long section location

**Legend**
- Without Development
- With Development




| Link | WwAccess20228.2 | WwAccess37187.1 | WwAccess44607.1 | WwAccess37188.1 | WwAccess20232.2 | WwAccess37201.1 | WwAccess20238.1 | - | WwAccess20244.1 | - |
|---|---|---|---|---|---|---|---|---|---|---|
| Asset ID | WwPipe50934 | WwPipe50935 | WwPipe72964 | WwPipe50950 | WwPipe50951 | WwPipe20769 | WwPipe20776 | - | WwPipe20777 | - |
| width (mm) | 300 | 300 | 300 | 300 | 300 | 300 | 300 | 300 | 300 | 367 |
| length (m) | 67.8 | 70.9 | 66.3 | 69.6 | 83.3 | 90.6 | 69.8 | 22.3 | 74.3 | 22.3 |
| us inv (m AD) | 9.390 | 9.156 | 8.957 | 8.847 | 8.682 | 8.350 | 8.184 | 7.880 | 7.811 | 7.541 |
| ds inv (m AD) | 9.176 | 8.965 | 8.847 | 8.672 | 8.360 | 8.199 | 7.901 | 7.823 | 7.572 | 7.430 |
| r.pfc (l/s) | 62 | 57 | 45 | 55 | 69 | 45 | 70 | 56 | 63 | 94 |
| surc | 0.44 | 0.55 | 0.55 | 0.52 | 0.57 | 0.59 | 0.47 | 0.51 | 0.50 | 0.39 |
| US flow (l/s) | 24.57 | 24.57 | 26.16 | 28.81 | 28.80 | 29.28 | 30.53 | 30.52 | 30.52 | 30.77 |
| Node | - | WwAccess37187 | - | - | WwAccess37188 | WwAccess20232 | WwAccess37201 | WwAccess20238 | - | WwAccess20244 | WwAccess20246 | - |

*Figure 3-1: Long section results from the Whisper Creek development discharge location to PS78.*

# 4. Conclusions

There are no predicted surcharge or overflow issues for the Whisper Creek development.

However, with the addition of the development, the downstream pump station PS78 is predicted to be at capacity. Because of this and because PS78 is operating at a pump rate of 29.95 L/s which is significantly below its original design capacity of 40 L/s, the development would trigger the need for proactive maintenance to recover the pump station performance to the design flow rate.

# 5. References

Christchurch City Council. (2022). *Infrastructure Design Standard.*

SCIRT. (13 Oct 2014). *11058 Kainga, Brooklands, Spencerville (WW) Detailed Design Report.*

WCS. (August 2024). *Christchurch City Council 2024 Design Storm Review.* WSP Reference: 3-CHDM2.05.

WSP. (2020). *Christchurch City Wastewater Model - Updated Growth Model Report Council Ref CPMS#51866.*

WSP. (2020). *Christchurch City Wastewater Model: Model Update and Calibration Report.* Council Reference: CPMS#51866/TRIM 20/197253 CCC: WSP Reference: 3-CHCH3.28.

**Appendix C – Earthworks Plan**

| T`XaW`Xagf | | |
|---|---|---|
| T`XaW`Xag | WTgX | WXfVe\cg\ba |
| | | |
| | | |
| | | |

abgXf

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4. This plan is subject to the granting of subdivision and/or resource consents and should be treated as a proposal until such time as the necessary consents have been granted by the relevant authorities.
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6. Boundary information has been derived from Terraview.
7. This site is earthquake affected and there are likely to be changes in the final boundaries as a result . All boundaries are approximate only until the final land transfer survey is complete. No liability is accepted in relation to any changes to boundary dimensions and areas as a result of earthquake movement.
8. Contours are from LIDAR and in terms of NZVD 2016
9. Contour Interval 0.20m

Origin of Levels
CCC BM 42
(EHD8)
RL=1.6139m
Located on Lower Styx Road

**Levels in terms of NZVD 2016**
**CCC BM 42 [EHD8]**
**Lyttelton Vertical Datum: 1.948**
**NZVD 2016: 1.614**
**Correction from Christchurch Drainage Datum to NZVD 2016 = -9.37**

**Min Site Level: 3.0**
**Min Road Level 2.60**

NORTH

Spencerville Road
Turners Road
Leopes Road
Lower Styx Road

FILL 1.0
FILL 1.5
CUT 1.0
FILL 0.5
CUT 0.5
FILL 0.2
1.46ha HIGH DENSITY HOUSING
30 HOMES
Lot 1 DP 76533
Balance Area 4.2ha 63 sites
Area Set aside for Wetlands and Recreation uses
Existing Drainage easement by YEC 11/3/17 (175/537)

Legend
- Fill
- Cut
- Flood Management Area
- Flood Ponding Management Area
- High Flood Hazard Management

DAVIE LOVELL-SMITH
PLANNING SURVEYING ENGINEERING

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**Whisper Creek Project**

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**EARTHWORKS PLAN**

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**For INFORMATION**

| | | | |
|---|---|---|---|
| fVT_X | 1:2500@A1<br>1:5000@A3 | WTgX | April 2025 |
| VTW Y_X | J:\19432\Eng\Drawings\800Lots\E19432-Earthworks Plan.dwg | | |
| WeTj\aZ a£ | | f[XXg a£ | |
| E.19432 | | 2 OF 3 | R0 |

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**Appendix D – Roading Cross sections**

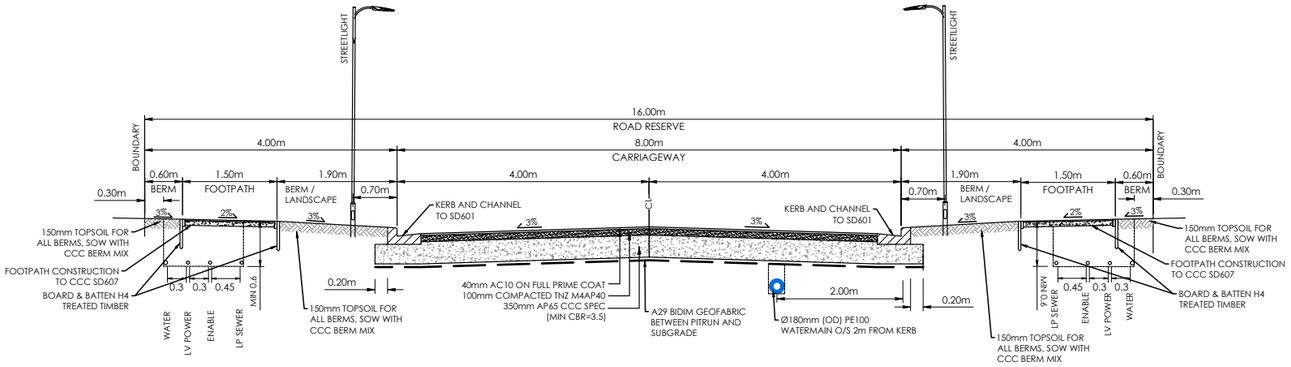
| T`XaW`Xagf# | | |
|---|---|---|
| T`XaW`Xag | WTgX | WXfVe\cg\ba |
| | | |

NOTES :

1. ALL WORKS IN ACCORDANCE WITH CCC IDS AND CSS PARTS 1-7 CURRENT ISSUE.
2. ALL PLANS ARE TO BE READ AND DISTRIBUTED AS A COMPLETE SET. ANY DISCREPANCIES ARE TO BE BROUGHT TO THE ATTENTION OF THE ENGINEER FOR CLARIFICATION.
3. ORIGIN OF LEVELS

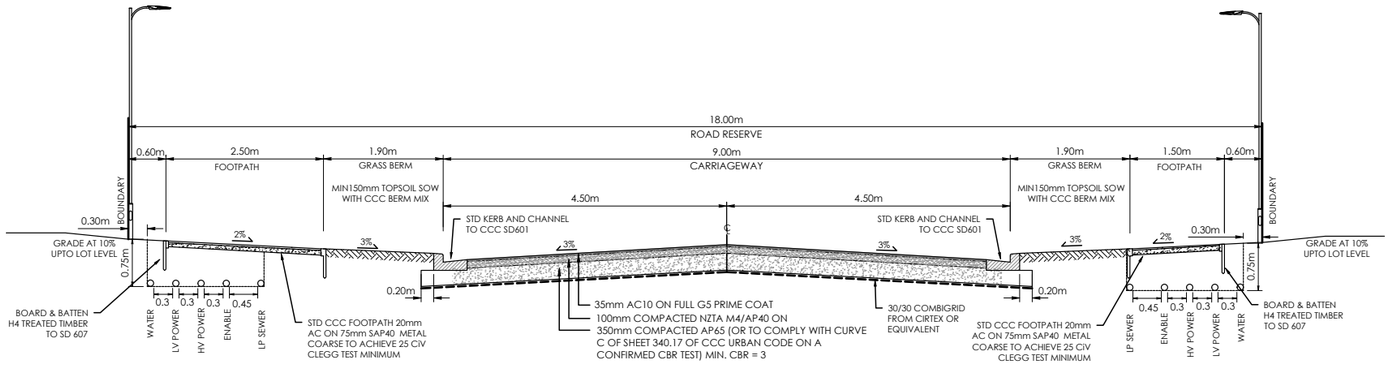
   BM._____ RL=_____ LOCATED_____

   LEVELS IN TERMS OF CHRISTCHURCH DRAINAGE DATUM. POST JUNE EMERGENCY LEVELS.
4. ELECTRICITY & TELECOM SERVICES NOT SHOWN. REFER TO ELECTRICAL & COMMUNICATION PLANS FOR DUCT LOCATIONS.
5. METAL DEPTHS TO BE CONFIRMED OR INCREASED PRIOR TO COMMENCEMENT OF WORK FOLLOWING THE CHECKING OF SUBGRADE CBR ON SITE.
6. CARRIAGEWAY AND FOOTPATH ACCEPTANCE TESTING IN ACCORDANCE WITH CCC CSS PART 6 AND CCC IDS.
7. FOOTPATH BASECOURSE TESTING - MINIMUM CLEGG HAMMER VALUE OF 25 REQUIRED FOR FOOTPATHS & RESIDENTIAL CROSSINGS.
   - MINIMUM CLEGG HAMMER VALUE OF 35 REQUIRED FOR COMMERCIAL CROSSINGS.
8. KERB & CHANNEL BASECOURSE TESTING - MINIMUM DRY DENSITY OF 2100kg/m³ WITH 75% EQUAL OR EXCEEDING 2150kg/m³.
9. ROAD BASECOURSE TESTING - MAXIMUM BENKELMAN BEAM DEFLECTION OF 2.00mm WITH 95% BELOW 1.6mm FOR _____ AND A MAXIMUM DEFLECTION OF 2.5mm WITH 95% BELOW 2.00mm FOR _____.
10. ALL ROAD AND FOOTPATH AREAS TO BE SURFACED USING ASPHALTIC CONCRETE. FOOTPATHS TO BE CONSTRUCTED IN ACCORDANCE WITH CCC REQUIREMENTS WITH 20mm DEPTH AC, WHILE ROAD PAVEMENTS TO BE 30mm DEPTH.
11. ALL PAVEMENT CROSSFALLS ARE TO BE CONSTRUCTED IN ACCORDANCE SD623.
12. KERBS AT INTERSECTIONS HAVE A RADIUS OF 6.0m UNLESS SHOWN OTHERWISE.
13. CUTDOWNS AT RESIDENTIAL PARKING AREAS TO HAVE 280mm OF CONCRETE AS PER SD611 AND CUT DOWN IN COMMERCIAL PARKING AREAS TO HAVE 280mm OF CONCRETE WITH REINFORCEMENT AS PER SD611.
14. TACTILE PAVERS ARE TO BE INSTALLED AS PER SD627 AND RTS14 GUIDELINES FOR FACILITIES FOR THE BLIND AND VISION-IMPAIRED PEDESTRIANS.
15. ALL ROW AND DRIVEWAYS ARE TO HAVE 50mm DUCTS INSTALLED FOR COMMUNICATIONS AND POWER SUPPLY.
16. ALL BERMS TO BE AND COVERED WITH A MINIMUM OF 150mm GRADE 1 TOPSOIL AND GRASSED WITH CCC BERM MIX.



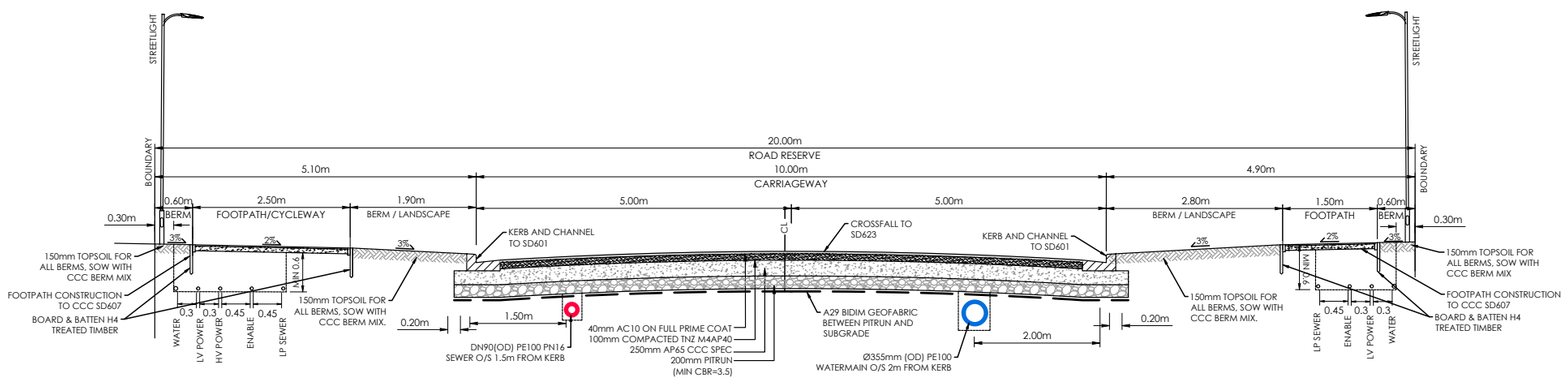

## TYPICAL CROSS SECTION 16m ROAD

SCALE 1:50@A1
1:100@A3




## TYPICAL CROSS SECTION 18m ROAD

SCALE 1:50@A1
1:100@A3




## TYPICAL CROSS SECTION 20m ROAD

SCALE 1:50@A1
1:100@A3

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**Whisper Creek Project**

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**Roading Sections**

WeTj|aZ fgTghf

**For INFORMATION**

| | | | |
|---|---|---|---|
| fVT_X# As Shown | WTgX# April 2025 | | |
| VTWY_X# J:\19432\Eng\Drawings\800Lots\E19432-Road Cross-Sections.dwg | | | WeTja# |
| WeTj\|aZ a£# | f[XXg a£# | | eXi\|fiba# |
| **E.19432** | **E03.1** | | **R0** |

**Appendix E – Trunk Sewer Route**

abgXf !

1. Areas and dimensions are approximate only and are subject to final survey and deposit of plans.
2. Service easements to be created as required.
3. This plan has been prepared to show the proposed connection to existing sewer for subdivision consent purposes only. No liability is accepted if the plan is used for any other purposes.

## Legend

| EXISTING SERVICES | | PROPOSED SERVICES | |
|---|---|---|---|
| SANITARY SEWER | STD. MH | SANITARY SEWER | STD. MH |
| WATER | | WATER | |
| | | SWALE | |

DAVIE LOVELL-SMITH
PLANNING SURVEYING ENGINEERING

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**Whisper Creek Project**

f[XXg g\g_X!

**Proposed Sewer Connection**

WeTj\aZ fgTghf

**For Consent Purposes**

fVT_X!! 1:2000@A1 1:4000@A3 WTgX!! April 2025

VTW Y_X!! J:\19432\Subcon\E19432-Sewer Connection Concept R0.dwg

WeTj\aZ aE!! **E.19432** f[XXg aE! 1 OF 1 **R0**

**Appendix F – Stormwater Concept Plan**

| T`XaW`Xagf | | |
|---|---|---|
| T`XaW`Xag | WTgX | WXfVe\cg\ba |
| | | |
| | | |
| | | |

abgXf

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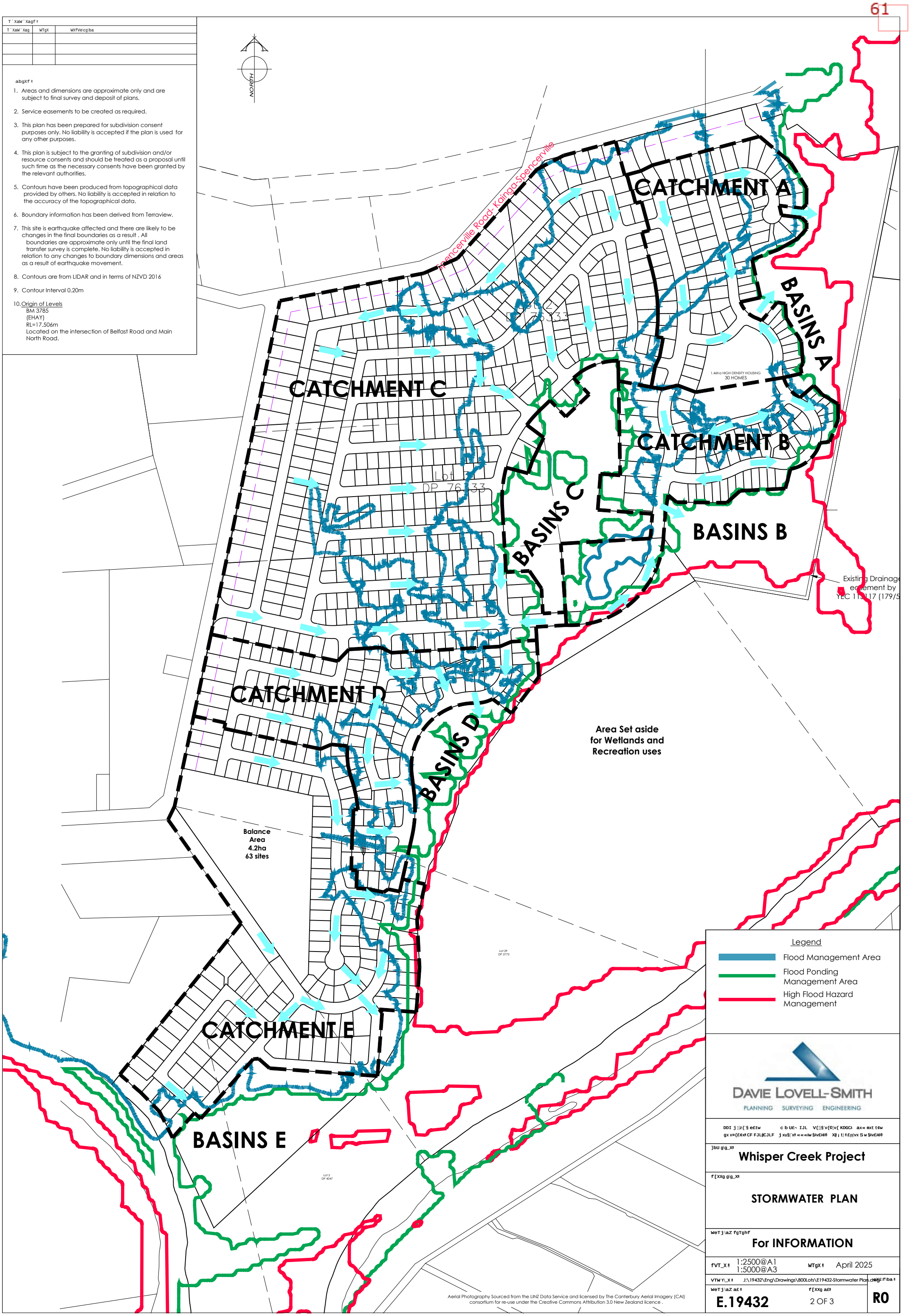
8. Contours are from LIDAR and in terms of NZVD 2016
9. Contour Interval 0.20m
10. Origin of Levels
    BM 3785
    (EHAY)
    RL=17.506m
    Located on the intersection of Belfast Road and Main North Road.



# Whisper Creek Subdivision
# Stormwater Calculations for Subcon

**R6**

**19432**
AH
**10-Apr-25**

## First Flush Volume

**Section 6.4.1 WWDG**

| | | | |
|---|---|---|---|
| Catchment Area | 83.05 | ha | Refer to Catchment Plan |
| Cff | 0.63 | | Table 6.10 WWDG |
| dff | 25 | mm | |
| Vff = 10 x Cff x dff x A | | | |
| Vff | **13080.4** | **m³** | |

Mean Depth is to be 1m

## Wetland Design

**Section 6.7.2 WWDG**

| | | |
|---|---|---|
| FF discharge flow over spread over 4 days | 3270.09 | m³/day |
| t - hydraulic residence time | 2 | days |
| y - water depth | 0.5 | m |
| n - planting porosity | 0.75 | |
| Area of wetland As = Qt/yn | **17440.50** | **m²** |
| Discharge rate from FF to Wetland over four days | 37.85 | l/s |

## Storage Design

| | | |
|---|---|---|
| Predevelopment Runoff C | 0.3 | |
| Postdevelopment Runcoff C | 0.65 | |
| Predevelopment discharge (48hr) | 246.38 | l/s |

| Storm Duration | Intensity | Pre development Peak Flow | Post development Peak Flow | Flow Difference Peak Flow | Post Development Volume Storm Vol | Outfall at 48hr pre-development rate Discharged Vol | Storage Reqd. |
|---|---|---|---|---|---|---|---|
| D (min) | i (mm/hr) | Q (Tc) (l/s) | Q (Tc) (l/s) | Q (Tc) (l/s) | V (cu.m) | V (cu.m) | V (cu.m) |
| 10 | 70.3 | 4865.35 | 10541.58 | 5676.24 | 6324.95 | 147.83 | 6177.12 |
| 15 | 57.4 | 3972.56 | 8607.21 | 4634.65 | 7746.49 | 221.74 | 7524.75 |
| 20 | 49.6 | 3432.73 | 7437.59 | 4004.86 | 8925.11 | 295.66 | 8629.45 |
| 30 | 40.5 | 2802.94 | 6073.03 | 3270.09 | 10931.46 | 443.49 | 10487.97 |
| 45 | 33 | 2283.88 | 4948.40 | 2664.52 | 13360.67 | 665.23 | 12695.44 |
| 60 | 28.6 | 1979.36 | 4288.61 | 2309.25 | 15439.00 | 886.97 | 14552.02 |
| 90 | 23.3 | 1612.55 | 3493.87 | 1881.31 | 18866.88 | 1330.46 | 17536.42 |
| 120 | 20.2 | 1398.01 | 3029.02 | 1631.01 | 21808.93 | 1773.95 | 20034.98 |
| 240 | 14.2 | 982.76 | 2129.31 | 1146.55 | 30662.06 | 3547.90 | 27114.16 |
| 360 | 11.6 | 802.82 | 1739.44 | 936.62 | 37571.82 | 5321.84 | 32249.98 |
| 720 | 8.19 | 566.82 | 1228.10 | 661.29 | 53054.00 | 10643.69 | 42410.31 |
| 1080 | 6.68 | 462.31 | 1001.68 | 539.36 | 64908.56 | 15965.53 | 48943.03 |
| 1440 | 5.78 | 400.02 | 866.72 | 466.69 | 74884.52 | 21287.38 | 53597.15 |
| 2160 | 4.35 | 301.06 | 652.29 | 351.23 | 84536.60 | 31931.06 | 52605.53 |
| 2880 | 3.56 | 246.38 | 533.83 | 287.45 | 92245.30 | 42574.75 | 49670.54 |
| 4320 | 2.68 | 185.48 | 401.87 | 216.39 | 104164.63 | 63862.13 | 40302.50 |
| 5760 | 2.19 | 151.57 | 328.39 | 176.83 | 113492.81 | 85149.50 | 28343.30 |

**Required**

| | |
|---|---|
| Volume to be stored | **53597.15** m³ |
| Storage in the FF to 1.0m | 13080.38 m³ |
| Storage in the wetland at 0.5m depth | 8720.25 m³ |
| Additional storage to be provided in basin network | 31796.52 m³ |

**Appendix G – Flooding Plan**

T`XaW`Xagf

| T`XaW`Xag | WTgX | WXfVe\cg\ba |
|---|---|---|
| | | |
| | | |
| | | |

abgXf

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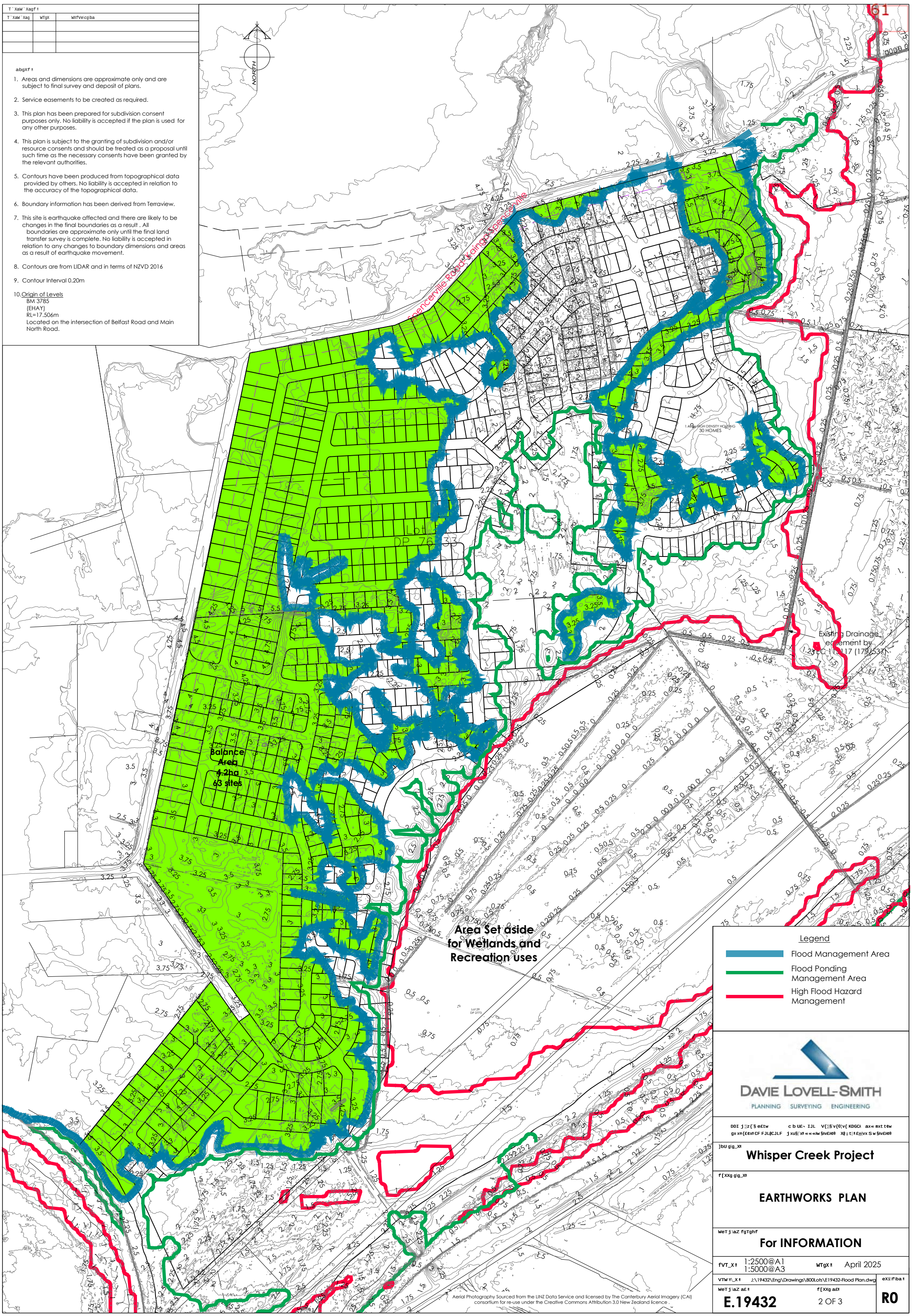

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Aleesa **Last name:** McKenzie

**Prefered method of contact**

**Postal address:** 7 Hemingway Place, Spencerville, Christchurch, Christchurch, New Zealand, 8083

**Email:** aleesamckenzie@gmail.com

**Daytime Phone:** 0272394841

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**
I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**

**Reason for Decision Requested:**

### Specific Provisions

the proposed rezoning of land relating to private plan change 23 whisper creek

### Reasons

increase in flood risk, a large portion of the farm land provides flood protection area increase in traffic on roads which will not support this amount of housing, current roading is very average with a one lane bridge to Spencerville increase risk in evacuation process should there be any catastrophic event such as a Tsunami likelyhood of significant increase in expense to surounding homes ie Spencerville in rates for the upgrade of infrastructure loss of greenspace, Spencerville residents live in such areas to enjoy a quiet partial rural lifestyle, this would significantly remove this Spencerville water was already impacted with the development at Prestons, this proposed development will likely affect this further. impact to emergency services, such as Spencerville fire, and already busy volunteer brigade potential for higher crime possible effect on the quality of water and waterways of styx river with increased housing and changes to infrastructure no clear vision on the impact this may have on schooling in the area and the capability to aborb this proposed number of homes possible increase in littering in area overcrowding of public areas and reserves in the area

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Janine **Last name:** Burns

**Prefered method of contact**

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**Email:** j9wow@hotmail.com

**Daytime Phone:** 02102600423

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Same as what the Spencerville Residents Association have written - no point you reading it more than once.

**Reason for Decision Requested:**

### Specific Provisions

Same as what the Spencerville Residents Association have written - no point you reading it more than once.

### Reasons

Same as what the Spencerville Residents Association have written - no point you reading it more than once.

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# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Gordon **Last name:** Cockerell

**Prefered method of contact**

**Postal address:** 174 Spencerville Road, Christchurch, Christchurch, New Zealand, 8083

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**Daytime Phone:** 0212042047

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
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**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Decline the plan change. Consider all adverse effects both enviromental and community to people living in this area

**Reason for Decision Requested:**

## Specific Provisions

The entire plan change.

## Reasons

We own the property at 174 Spencerville Road, we are opposed to this area being developed for intensification of residential dwellings. Our property has been included in this plan change without us seeking such rezoning of our property. We do not think this rezoning should proceed for a number of reasons including that the land is low lying and subject to flooding and the impacts of sea level rise. We think the water take required for the developement will signficantly affect our well for water use. Therefore consideration of the water take needs to be given due to the adverse effects on surrounding properties as well. Further, there will be significant adverse environmental and traffic effects. There needs to be an access road off Lower Styx Road and the surrounding roads, such as Turners Road and Spencerville Road would require significant upgrades to accommodate the amount of expected traffic. If there is no access to Lower Styx Road there will be a significant health and safety risk in the event of a tsunami.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Celeste **Last name:** Faithfull

**Prefered method of contact**

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**Email:** celestefaithfull@outlook.com

**Daytime Phone:** 0277755637

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

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**Note to person making submission:**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
I request that the council decline the proposed plan change in full.

**Reason for Decision Requested:**

### Specific Provisions

My submission relates to provisions concerning access and roading (including reliance on Spencerville Road, Turners Road, and the absence of Lower Styx Road access), natural hazard risk (flooding, tsunami evacuation, liquefaction), proposed stormwater and wastewater systems, water supply proposals, ecological impacts on the Styx River corridor, and any associated rule changes or structure plan elements needed to enable the development.

### Reasons

The proposal creates significant and unacceptable risks relating to transport safety and capacity, tsunami evacuation, natural hazards, stormwater flooding, wastewater capacity, and water supply reliability. The existing road network cannot safely support the scale of development proposed, and the infrastructure upgrades required have not been properly assessed or provided for. The site is also highly vulnerable to flooding, liquefaction, sea-level rise, and tsunami evacuation constraints. Additionally, the proposal lacks adequate protections for the ecological health of the Styx River and surrounding habitats. Overall, the plan change is inconsistent with the District Plan, the Regional Policy Statement, and sound urban planning principles, and would result in adverse effects on the environment and on the safety and well-being of the surrounding community.

**Name of submitters**

**Ouruhia Residents Group – Contact George Nimmo**
**(See attached signatures)**

## Application to which submission relates

1. This is a submission on an application by LMM Investments 2012 (the applicant /the proposal)

   This submission relates to the section 32 evaluation of the plan change and all related documents submitted by LMM and documents prepared by the Christchurch City Council (CCC) and any other relevant documents.

The submitters oppose all aspects of the proposal

## Relevant part(s) of the application

2. This submission relates to the entire proposal

## Effects of the Proposal

**3.** The key concerns and multiple adverse effects for the environment and community as follows…

**4. The site and surrounding environment**

4.1 The submitters point out that the application omits including the following important points related to the site and surrounding environment when consideration is to be given to building 800 new houses in this location.

4.2 The subject land is located very close to the sea. It is 1.3km southwest of the sea and closer to the Brooklands Lagoon, the waterway which forms part of and is adjacent to the mouth of the Waimakariri river mouth. An obvious adverse effect of the proposal is putting more residential houses in close proximity to sea level rise during climate change.

4.3 A further adverse effect is that the site is located in an area suspectable to increased natural hazards identified since the Canterbury Earthquakes in 2010/12. Importantly it is located in the tsunami zone illustrated in recent Council civil public sessions with Helen Jack. www.cdemcanterbury.govt.nz/hazards/tsunamis

4.4 The URS New Zealand Engineering and Environmental report on geology of the specific site for the Golf Links proposal highlighted the liquefaction susceptibility of the site to lateral spread. In addition, the proposed excavation and creation of wetland and lake in the eastern section of the site may increase the likelihood of lateral spreading issues due to the reduction of lateral constraint.

4.5 The canterbury Earthquake reports on the area show this is exactly what happened. What effective design to mitigate against the potential effects of liquification and lateral spread will specifically be undertaken in this development? https://www.tandfonline.com/doi/full/10.1080/00288306.2016.118292

## 5. To repurpose the no longer viable golf resort outcome.

5.1 The submitters are concerned that LMM picked out the most economically viable parts of the golf resort proposal and discarded important aspects decided under that decision. In particular discarding the decision to use Lower Styx Road as the safest and most effective main entry and exit point to the site and ecological reserve.

## 6. Impact on roads and increased traffic movements

6.1 The submitters point out the proposal does not demonstrate how it will adequately address and better deliver the objectives and policies of the Christchurch District Plan (CDP) in relation to transport outcomes in comparison to the specific purpose Golf Resort zone. It does not assess the consistency of the rezoning against the relevant higher level planning documents to an acceptable level. This was requested by the Council in its request for further information dated 11 June 2025.

6.2 The submitters consider the LMM in its reply to this request in the letter dated 7 July 2025 to be inadequate. The reply cites that because no transport-related adverse effects were identified in its transport assessment, in appendix E, they consider the proposal to be within the strategic policy direction regarding transportation matters.

6.3 The submitters are concerned that the proposal's transport assessment does not demonstrate sufficient evidential assessment and proof that it meets many aspects of the CDP and/or relevant objectives, policies and outcomes of the following higher order planning instruments and strategies namely:

- *Canterbury Regional Policy Statement including the relevant transport objectives and policies in Chapter 5 and 6*
- Greater Christchurch Spatial Plan
- Greater Christchurch Transport Plan
- Canterbury Regional Land Transport Plan 2024
- Ōtautahi Christchurch Future Transport 2024-54

In addition, the submitter considers there will be adverse transport related effects.

**Lower Styx Road access**

6.4 The submitters point out that under the rules in the CDP (13.9.5.1 (a)) for the Specific Purpose (Golf Resort) Zone Whisper Creek stipulates that the accessways would involve a major entrance off Lower Styx Road, an entrance off Spencerville Road and a service road off Teapes Road with restricted access.

6.5 The submitters are concerned that in the proposal, road access is unsafe and inadequate and will have adverse effects because the proposal does not include road access off Lower Styx Road thus this breaches rule 13.9.5.1. above.

6.6 The development of the site was blocked until the intersection of Lower Styx Road and Marshlands Road was signalized, this has now occurred. This option has already been established as the main road access to the development as it is a minor arterial road in the city hierarchy road under the scheme for the required traffic volume in the Golf Resort plan. There will be a higher volume of traffic under the proposal which makes access via Lower Styx Road essential.

6.7 The submitters believe that the ecological value of the land adjacent to the Styx River and in particular the *Source to Sea* walkway project must not be used as a reason for not constructing the bridge across the Styx River as required under the rules for the Golf resort. It should be noted that the Styx River *Source to Sea* project has spasmodic adjacent access to the river edge from the source of the Styx River. This means direct river edge access is not required in this section of the river to fit in with any overall *Source to Sea* accessway adjacent to the river.

6.8 The submitters point out that if a walkway is planned adjacent to the river there can be a tunnel walkway under the new bridge similar to that used in other locations.

6.9 The submitters further point out that the Styx River is recognised as extremely degraded ecologically. No ecological level of significance criteria would warrant changing a transport access to an 800-housing development by excluding a bridge to facilitate access to the housing in order to preserve the ecological significance of the river or adjacent wetlands areas.

6.10 The submitters believe that a main access route off Lower Styx Road is essential to minimize adverse transport-related effects. Including daily congestion, increased crash risk and treacherous exit provisions in light of an urgent excavation in a Tsunami civil defense emergency.

6.11 The main access way off Lower Styx Road is essential to minimize adverse vehicle access and wider transport-related effects. It is pointed out that Lower Styx Road is in better condition than Spencerville, Teapes and Turners roads. Especially given the proposal does not plan on upgrading these roads.

6.12 The submitters are concerned that the proposal states that there will be 720 traffic movements in the AM and PM peak traffic time which is well below the expected level given the two cars plus per household reality in Christchurch. The submitters believe 1600 car movements are a closer estimation, with a total daily movement of 6,560, (applicants' calculation).

6.13 The submitters are further concerned, that the likely high number of multiple person household rentals in the new development will further impact the number of vehicle movements. This proposal for use of the small local road network does not have the capacity to safely accommodate an 800-household increase in traffic. The local roads are in no state to accommodate that increased volume of traffic. Roads would require significant upgrades.

6.14 The submitters are also concerned that the three access roads proposed are in dangerous positions. Access will not have sufficient space to view traffic travelling from the West given its proximity to the corner on Spencerville Road. Further, the access road will compound the safety of the other roads proposed.

6.15 The Proposal's access roads onto Spencerville Road will have adverse traffic and traffic safety effects on the roading network due to the increased number of vehicles accessing the allotments off Spencerville Road. Spencerville road is a narrow local road, with limited streetlights and no footpaths, not designed for this volume of use.

**Spencerville road**

6.16 The submitters point out this road is classified in the scheme as a collector road. It is designated as a low volume local road below the width required by the roading standards. A collector road reflects a lesser dominance of through traffic and a greater role in servicing activities along the route. There are only 14 houses along the road.

6.17 In places the road is not in line with its survey pegs. For example, on the corner of Turners and Spencerville roads on the north side the road is 8 metres away from the survey pegs.

6.18 The submitters point out that the rail crossing on Spencerville Road is inadequate because the approach on both sides are on an angle and the crossing is on a ridge and very rough. This is below standard for any increased volume of traffic.

6.19 The submitters point out that in addition, it is formed as a narrow rural road with 5 metres width of seal with limited shoulders and no footpaths. The bends and undulations in Spencerville Road limit site distances. There is a one-way bridge at the Spencerville end of the road with approaches that give very poor visibility of approaching traffic.

6.20 The intersection of Spencerville and Marshland's Road (Chaney's Corner) is a very dangerous intersection and is of serious concern, even more so if traffic volumes utilising this intersection increase. This is partly because of its geometry and partly because of the inadequacies of the sight line over the rail crossing on Marshland Road, a little to the south of the intersection. Therefore, Chaney's corner will require significant upgrading to the extent of traffic lights and other safety work.

6.21 The submitters point out that these safety difficulties at the intersection on Spencerville/Marshland Road currently force more traffic onto the safer Turners Road. This is reported as happening already by long-term residents of the area.

6.22 The submitters consider the proposals modelling of traffic is deficient. A proposal for such an increased volume of traffic means Spencerville Road use will increase significantly. Spencerville Road will simply not be able to safely service an 800-household increase in its present state. This will require re-alignment and widening to support and cope with this increased volume of traffic.

6.23 The submitters point out that during weekend events at Spencer Park traffic is bumper to bumper on this road. It is the main access from the north to the Councils camping ground at Spencer Park and the volume increases in the summer months.

6.23 The Proposal underestimates the increased use of the one- way bridge on Spencerville Road. Residents will use this bridge in order to access Lower Styx Road to the city. In addition, the bridge provides access to recreational areas such as Spencer Park and Bottle Lake Forest. This bridge would need to be upgraded to a two- lane bridge.

6.24 The submitters consider this is a totally unworkable solution for traffic access to the wider city and Canterbury region.

6.25 The submitters point out that most residents will want to take the easiest road access to the motorway to the city for work and other services. This will be via Lower Styx Road to the on ramp at Belfast Road and will be facilitated by the controlled intersection at Marshland Road.

6.26 Alternatively, the submitters point out there will be a significant increase on Marshland Road to access the city.

6.27 In addition, the lack of public transport in this area must be taken into consideration. The one bus route stopped servicing Spencerville in 2019, consequently there is no public transport in the area.

6.28 The submitters are concerned that effect of the traffic proposal will cause adverse effects such as loss of amenity, adverse environmental impacts and increased traffic volume, accidents, delays and noise.

**Turners Road**

6.29 The road is classified in the District Scheme as a low volume local road below the width required by the roading standards. There will be a significant adverse effect from the increase in traffic movements along Turners Road. The cost of upgrading this road will be substantial for the rate payer.

**Transport Summary**

Overall, the submitters point out that the current roading network is totally inadequate and will require substantial construction work to bring up to the required standards. Therefore, the accumulative costs to the City Council and ultimately the ratepayer of upgrading all aspects of the roads and wider upgrading including the two bridges will be substantial and has not been planned for in the City Council budget.

## 7 Natural hazard risk and tsunamis – adverse effects

7.1 We submit that this proposal has a poorly planned transport plan which will increase the risk of citizens being able to quickly evacuate the area in face of a tsunami warning due to traffic congestion from 800 houses with insufficient road exit access. This breaches the Canterbury Regional Policy statement chapter 6. The policy explains in part that, “Poorly planned development can increase risk from natural hazards and the effects of climate change.”

7.2

In addition, the site is located in an area suspectable to increased natural hazards identified since the Canterbury Earthquakes In 2010/12. Importantly it is located in the tsunami zone. www.cdemcanterbury.govt.nz/hazards/tsunamis

`7.3 **New Sea Level Research**

*( Marine Environment 2025 – Ministry for the Environment)*

The newly released Extreme Coastal flood maps for Aotearoa NZ identifies areas in the development to be likely subject to coastal flooding as well as inundation from the Styx River. The submitters suggest developing a Residential New Neighbourhood Zone this close to the coast is unwise.

## 8 Three Waters – adverse effects

### 8.1 Potable water supply

The Christchurch city council has confirmed that there is insufficient fresh water supply for this development from its network. The development proposal suggests the use of either existing bores or new ones, with an associated water treatment plant to meet the developments requirements. The submitters are concerned that the existing bores were meant to be removed following testing as part of the Golf Course proposal, which hasn't happened. Secondly this issue is in the domain of Ecan, which has over allocated fresh water supplies within the canterbury catchment, so any new development could have a negative impact on other wells nearby.

### 8.2 Waste Water

The submitters are concerned that this development is planning to use the Kainga/Spencerville waste water network, which does not have the capacity for an additional 800 houses. The system was designed to meet the Kainga, Brooklands and Spencerville areas needs and allow for storm peak factor margins including infiltration.

The Brooklands area has been red zoned which reduces the load on the network by approximately by 470 dwellings, however another approximately 50 dwellings have been added in the Kainga area which means a further 420 could be serviced theoretically. However, it has been identified that the pumping station efficiency has been markedly reduced from its original design of 40 litres per second to 29.95 litres.

The model that has been proposed assumes that after so called proactive maintenance, this could recover the pump performance. There is no evidence at this stage that this is possible. The model also ignores the fact that the main line water discharge network has been significantly damaged by the earthquake and the infiltration and inflow will be much higher than what is allowed in the calculations following the earthquakes and the slumping of land levels in the existing built areas. The issue of 'surplus' capacity of the existing system would be much better used for infill housing and extensions of existing communities rather than a green fields site.

8.3 **Stormwater**

The submitters are concerned about the increase and the rapidity of the storm water discharge due to the significant area of buildings and hard stand areas into the retention ponds, which in turn flow into the Spencer Drain. The basins provided appear to be too small and being placed in the flood zone means they can easily become inundated in a major event. The Spencer Drain, which is the only major discharge route is 3000 metres long, but only has a fall of half a metre of fall giving a gradient of 1/6000. This is entirely inadequate to deal with the current storm water discharge, let alone the increase in rate caused by the hard standing areas and roofs.

There are two further factors which have not been considered by the applicant, which are the pumping station which is the only effective route which storm water can be disposed of into the Styx River in a storm event. These pumps have not been considered in the model provided, and neither the fact that the level of the Styx River is controlled by the flood gates at its terminus. These gates are opened and closed on tidal flows and when the Waimakariri is in flood they can remain closed, which allows the Styx River to breach the stop banks and cause extensive flooding. The submitters need to be satisfied that these are addressed prior to any approval. The flood gates need to be upgraded to mechanical control, accompanied by additional pumps.

## 9 Ecology – further adverse effects

9.1 **Styx River Corridor**

The greater Styx River corridor is home to a range of endangered species, including lizards/geckos, eels, lampreys and a variety of birds. The application has no comprehensive plan for the protection of species or their relocation, including alternative foraging and nesting sites. The submitters would recommend the flood plain, which is currently grazed and is a source of faecal contamination during flood events should not be rezoned to Rural Urban Fringe but to a Conservation Zoning and be a condition of any approval if it was decided to allow the private plan change. Additionally, this would open up the site for community and ecological benefit rather than be off limits as proposed.

9.2 The Styx River is significantly degraded and the most recent survey of the river was undertaken by Boffa Miskell on behalf of the Christchurch City Council in 2023. It is interesting to note that the applicants ecological impact assessment does not reference this report, which demonstrates an ongoing deterioration in the river, with increasing levels of zinc and other metals.

"Elevated zinc concentrations can reflect the urbanisation of catchments (e.g., galvanised roofing and spouting can be major sources of zinc). Best practice stormwater management techniques should be prioritised where urban development is increasing. Untreated, or poorly treated, stormwater can bring contaminants into waterways, which can be toxic to freshwater fauna. This is especially important for the Pūharakekenui / Styx River catchment where EPT taxa, including mayflies still occur." (*Pūharakekenui*

*Styx River catchment, Five-yearly and annual aquatic ecology monitoring. Prepared for the Christchurch City Council by Boffa Miskell. 4 September 2023)*

The build up of sediment associated with urbanisation of catchments is also having a major negative impact on the river. The current methods of attempting to deal with both these issues have proved ineffective, and if this development was to proceed it would only worsen the current degradation. This silt, as shown in the report, is building up and causes invertebrate to die, leading to a collapse in the food chain.

## 10. Community Amenity Issues – further adverse effects

### 10.1 Urbanisation

The submitters are concerned that this development will increase the number of houses in the Ouruhia area by 1330%. Rather than having a bucolic outlook, there will be an intensive urbanisation of homes on small sections, which is in contrast to the surrounding area, where individual sites or single houses are usually around 1000 square metres with an open environment.

| **Census Dwellings per Square Kilometre 2023*** | | | |
|---|---|---|---|
| **Area** | **Total Dwellings** | **Area Square Kilometre** | **Dwelling per Square Kilometre** |
| Ouruhia | 60 | 2.67 | 22.5 |
| Brooklands-Spencerville | 267 | 7.25 | 36.8 |
| Marshlands | 228 | 7.99 | 28.5 |

**Census data is rounded to a multiple of 3 to protect individual anonymity. Summing across categories can therefore lead to compounded errors and totals not equalling 100%.*

The proposal has no controls over the visual aspects of the design and construction of the homes, unlike the Golf proposal, which had strong design elements to blend into the surrounding countryside with wide open space with set backs of 50 to 100 metres from roads and surrounding properties. This proposal only has a 5-metre strip around the development, and 10 metre setbacks to buildings, which is entirely inappropriate in a rural area. Additionally, there are no lighting plans to protect the night sky with low lighting street lights. Unlike the Golf resort proposal there is only a very small increase in public access to the river and flood plain area, but no proposed improvement in the road side swales for drainage or footpaths, which are important for residents, including school children.

### 10.2 Reverse effects

This is primarily a rural farming area with a significant number of rural associated vehicle movements, including tractors and truck and trailer units on a daily basis. During the summer irrigation is undertaken 24/7 which

inevitability does result in some noise as well. With disproportionate urban development this could result in difficulties between residents and the farming community.

10.3 **Commercial Area**

The proposal includes a commercial area, but no associated guidelines as to the activities which will be permitted. The submitters see that the hours of operation and the type of activities undertaken are directly related to the community and should not include antisocial or toxic activities. E.g. public bars, liquor store, vape shops etc.

**11 Economic benefits**

The proposal outlines a list of supposed economic benefits for the community. The submitters would contest that as this development is only a short one-off exercise, whereas the previous golf course was an ongoing business employing a large number of people and improving the ecological and social environment for the community. This proposal places a large urban development crammed into a narrow terrace with no support structure e.g. public transport, library, medical centre or swimming pool. The submitters see that this development is negative to both the environment and local community.

**12 Broadcasting transmitter and mast situated at 143 Lower Styx Road – further adverse effects**

The submitters are concerned that this proposal will have a very large and concentrated areas of housing close to the radio mast which is 137 metres high. It has been shown that such towers do cause potentially harmful radio frequency fields to human health. For this reason, the original consent allowed its construction as “this particular location is reasonably isolated from surrounding houses and about 700 metres from the nearest road”. The council has accepted in the past that a rural zone is appropriate for such masts.

An article by respected scientist Dr. Neil Cherry, outlining the dangers associated with high radio frequencies. It was never envisaged that a high-density housing development would be built so close to the aerial and should not allowed to proceed. (*Health Effects in the vicinity of Radio/TV towers and mobile phone base stations. Dr Neil Cherry O.N.Z.M. Associate Professor of Environmental Health. 6th September 2002).*

**13. Construction -further adverse effects**

The submitters are concerned regarding the potential noise, dust and general nuisance to be caused by this development if it were to go ahead. There needs to be a sequence development plan with strong environmental and construction controls if the proposal is approved. We would submit, that prior to any construction or development of the facilities that the bridge over the Styx River be constructed and this be the only entrance to the development during construction. The volumes of fill required will involve

thousands of truck loads, which will be entirely unsuitable for the road network and be deleterious for the health and welfare of the residents. Unlike the golf course where there was only internal movement of fill. This project will require substantial fill from outside sources, which can result in contamination to the site here and ultimately the river. If the development was to be approved there needs to be frequent and independent monitoring of all materials entering the site.

Hours of work need to be restricted to 7 a.m. – 6 p.m. Monday to Friday and 7 a.m. -12 noon on Saturday.

**14 Demand**

The proposal suggests there is a high demand for development in this area, however, no evidence is provided. In fact, because of the red zoning of Brooklands and associated earthquake damage to the area there is a natural caution from potential buyers to commit to this area. The CCC has already made it clear that in its long-term plan it has identified sufficient land zoned for development for the next 30 years. Together these issues negate the submission by LMM regarding potential demand for a subdivision which has many negating factors for approval including transport, flooding and inundation, lack of infrastructure, and poor geological history.

**15 Cultural values**

Local Ngai Tahu members have raised the issue of traditional pathway between Ngai Tuhariri Pa to the sea. As there appears to have been no significant archaeological study of the area, this needs to be completed prior to any development. We have written to Ngai Tahu regarding this matter and are awaiting their reply.

**16 Contamination – further adverse effects**

The contamination report provided to the submitters is deficient in a number of areas.

These include the fact that part of the upper terrace along Turners Road has been and is actively market gardened. Historically this farm has also produced on the lower levels horticultural crops e.g. potatoes, onions etc.. Additionally, the Boffa Miskell report (2004) identifies further potential areas of contamination not included in the applicants' report.
Further significant independent testing for contamination should be undertaken before any development.

**17 Consultation**

There has been no broad consultation with the community. We do understand that there has been some interaction between the developer and at least some of the owners of the 4 hectare blocks which he is attempting to rezone. This is in stark contrast with the developers of the previous Special Purpose Golf Course developers who did consult quite widely with the community.

It should be noted that the applicant is only able to demonstrate ownership and control of 63.79 hectares of the total area of 170 hectares of the proposed rezoned land. This raises the issue of how the applicant is going to reach the 800 section threshold.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Debbie Lee **Last name:** English

**Prefered method of contact**

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**Daytime Phone:** 0210351119

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

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**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Decline the proposed subdivision.

**Reason for Decision Requested:**

### Specific Provisions

1. I am concerned about the extra sewerage to the area. 2. Worried about flooding when it rains heavily. 3. Access and traffic jams in an emergency. E.g tsunami evacuation 4. Extra rate payer costs. 5. Too much traffic in the area.

### Reasons

1. It already smells of sewerage on the corner of Lower Styx Rd and Seabrook Drive and doesn't appear to be coping. 2. The area already floods opposite us where the paddocks are, as far as the eye can see when it rains heavily. 3. Traffic jams when leaving the area in an emergency like tsunami evacuation. There are only 3 routes to leave the area with only one going inland. 4. Concerned about a huge increase in costs to the ratepayer to upgrade roads and the bridge across the river. 5. The proposed subdivision will bring many more cars to the area.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Denis John **Last name:** Gilmore

**Prefered method of contact**

**Postal address:** 17 Nautilus Place, Christchurch, Christchurch, New Zealand, 8083

**Email:** gilmored53@gmail.com

**Daytime Phone:** 0273844019

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**

**Reason for Decision Requested:**

### Specific Provisions

The amending of the Christchurch district plan to allow rezoning of special Purpose Golf Resort and rural Urban fringe zones to Residential New Neighbourhood. The rezoning of the lower terrace areas subject to flood management away from l purpose to Rural Urban fringe, and to enable a Neighbourhood Centre to be located on the site.

### Reasons

Several:1. Flood Risk. I have lived in the vicinity of the Styx River for over 60 years, I swum in it as a boy, and in Brooklands and Spencerville as an adult for approximately 40 years.In Brooklands (925 Lower Styx rd) the river regularly overflowed through our property and onto the road such that I had to retrieve childrens balls, firewood etc back from the road. It completely surrounded the house, but fortunately didnt get higher than the floor boards. The house is still there and flooding has been worse since the Kaikoura quakes - at least once every year.I had a brief look, but couldn't find photographs I have taken at times over the last 8,9 years, from the road side (higher) bank of the river just south of Heyders rd - of the river and paddocks from there all the way through to Tipple's bridge as a water continuum, that looked quite pretty, especially with the sun setting. Ducks and geese quickly adopt paddocks as a lake. Beyond the bridge (west) Mr Tipple has been building up the paddocks, but I expect that will only increase the flooding east through the area proposed for rezoning, away from Flood Management.Urban developments add a lot more tar seal, stop the land from holding and slowly releasing water and increase run off into the river, increasing flooding downstream.Over the last ten years there have been several urban developments that run into the river.With all the talk of climate change, further incursion of water in land from the coast, and especially fvia the lagoon, it seems very short sighted to plan urban development in such a low lying coastal area. In Spencerville we have been told of a likelihood of our properties being uninsurable in future and of decreased value.it doesn't seem responsible to plan urban development in low lying Eastern areas, especially since there is higher land on the Yaldhurst, Harewood side.2. Loss of Farming, orchading and market gardening land.Christchurch used to have a green belt, with only planned urban development. In that green belt were market gardens and orchards in soils (eg dark peat soil) that grew vegetables and fruit for the nearby city. Marshlands , Belfast, Ouruhia had such. Court battles (in which the CCC opposed ECAN, as I recall, with the CCC fighting to preserve the green belt, (all at ratepayers expense) when ECAN should have been fighting for the same) The Applefields owners sat on productive orchards so that they could make big profit from urban development. In this development, the driving force is not common sense, but profit by developers.It is upsetting to me to see rich, dark peat soil being dug up, since it moves (sinks) and is unsuitable for building on, along prestons rd opposite Burlington.3 Increased traffic on the existing roads, in normal times and especially in times of flood warning and tsunami.4 There is other but I have run ou if tie, and this online submission mucked up formatting, deleted things already entered, and made it difficult to make a submission tha I heard of only recently. It is as if the CC doesn't want objections and weighted things in favor of it going ahead.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Lyndia **Last name:** Maurice

**Prefered method of contact**

**Postal address:** 266 Spencerville Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** lyndiamaurice@gmail.com

**Daytime Phone:** 0275875169

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
We have been farming in the area for ninety years and run a Hereford stud next to the proposed development we do not want to run out by increasing rates. Our animals are of exceptional quality and calf once a year. My concern is with the increased foot traffic they

will have no privacy to do what they do naturally. Proper farming is a delicate operation. These two business men are in for a pound with promises attached that are broken. Let my son do what New Zealand wants has been praised for he loves his animals and they are more important than 800 houses and noise that really will impact my brother sister myself and my son's passion.

**Reason for Decision Requested:**

## Specific Provisions

Increased population impacting on our business. The heavy vehicles will shake the surrounding houses and make life difficult. I could continue but my emotions will impact the validation of the above points . Please this development is an absolute disaster on the ecology of this area and I strongly advise you to look into this development throughly.

## Reasons

Stewage The developer plans to hook up to the Spencerville/Kainga system however it doesn't have the capacity for an extra 800 houses. Drainage this new development will have negative impact on the water table e.g. the Spencer drain which flows into the Styx river making the surrounding farmland greatly impacted by excess water levels Roaring the I increased number of cars etc on a very narrow Spencerville Road the road won't take the increase of at least 650 vehicles a day.

Christchurch City Council

# Submission on a Publicly Notified Plan Change to the Christchurch District Plan

Resource Management Act 1991 – Form 13

**Email to:** PlanChange@ccc.govt.nz ; or
**Deliver to:** Ground floor reception, Christchurch City Council, 53 Hereford Street, Christchurch Attn: City Planning Team; or
**Send to:** City Planning Team, Christchurch City Council, PO Box 73012, Christchurch, 8154

**For enquiries phone: (03) 941 8999**

## 1. I wish to make a submission on:

Plan change name & number: Private plan change 23 Whisper creek

## 2. Submitter details

Full name of submitter: Lyndia Maurice

Street address: 266 Spencerville Road Ouruhia christchurch 8083

Postal Address (if different):

Contact phone number (daytime): 0275875169 Postcode: 8083

Email: lyndiamaurice@gmail.com

My address for service for receiving documents and communication about this application is: [\] By email [ ] By post

## 3. Submission details

I / We:
- [ ] Support all or part of the application
- [/] Oppose all or part of the application
- [ ] Am neutral towards the application

The specific provisions of the plan change that my / our submission relates to are: *(give details, using additional pages if required)*

Increased population impacting on our business

The heavy vehicles will shake the surrounding houses and make life difficult.
I could continue but my emotions will impact the validation of the above points .
Please this development is an absolute disaster on the quality of this area and I strongly advise you to look into this development throughly.

The reasons for my / our submission are: *(use additional pages if required)*

Stewage The developer plans to hook up to the Spencerville/Kainga system however it doesn't have the capacity for an extra 800 houses
Drainage this new development will have negative impact on the water table eg the Spencer drain which flows into the Styx river making the surrounding farmland greatly impacted by excess water levels
Roaring the I increased number of cars etc on a very narrow Spencerville Road the road won't take the increase of at least 650 vehicles a day.

The decision I / we would like the Council to make is: *(give details including, if relevant, the parts of the application you wish to have amended and the general nature of any conditions sought. Use additional pages if required)*

We have been farming in the area for ninety years and run a Hereford stud next to the proposed development we do not want to run out by increasing rates.
Our animals are of exceptional quality and calf once a year. My concern is with the increased foot traffic they will have no privacy to do what they do naturallyProper farming is a delicate operation.
These two business men are in for a pound with promises attached that are broken. Let my son do what New Zealand wants has been praised for he loves his animals and they are more important than 800 houses and noise that really will impact my brother sister myself and my son's passion.

## 4. Trade competition

I / We: [/] **Are not** a trade competitor of the applicant OR

[ ] **Are** a trade competitor of the applicant, and are directly affected by an effect of the proposal on the environment which does not relate to trade competition or the effects of trade competition.

## 5. Hearing of this application

If a hearing is held, I / we:

[/] **Wish to** speak in support of my / our submission

[ ] **Do not wish to** speak in support of my / our submission

[/] If others make a similar submission I / we will consider presenting a joint case with them at the hearing

[ ] Request that the Council delegates its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the Council, under section 100A of the Resource Management Act.

*Please note that a hearing will only be held if the applicant and/or any submitters wish to be heard, but all submissions will be taken into consideration regardless.*

*If you change your mind about whether you wish to speak at the hearing, please contact the Council by telephone on 941 8999 or by email at PlanChange@ccc.govt.nz.*

## 6. Signature (of submitter(s) or person authorised to sign on behalf of submitter(s)

| | | | |
|---|---|---|---|
| Signature: | L Marie | Date: | 28 / 10 /25 |
| Signature: | | Date: | |

*Note: A signature is not required if you make your submission electronically*

### Important information

1. The Council must receive your submission before the closing date and time for submissions on this application.
2. If you are a trade competitor, your right to make a submission may be limited by the provisions in Part 11A of the RMA.
3. The Council may strike out a submission (or part of it) in the following situations:
   - It is frivolous or vexatious
   - It discloses no reasonable or relevant case
   - It would be an abuse of the hearing process to allow it to be taken further
   - It contains offensive language
   - It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matters.

### Privacy information

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker) and the applicant.

Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

**Office use only**

Received at the …… Office on …… at …… am / pm

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** **Last name:**

Canterbury Regional Council (Environment Canterbury)

**Prefered method of contact**

**Postal address:** 200 Tuam Street/PO Box 345, central city, christchurch, New Zealand, 8011

**Email:** regional.planning@ecan.govt.nz

**Daytime Phone:** 027 256 1761

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**
I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Neutral**
**Decision Requested:**
as per attached

**Reason for Decision Requested:**

## Specific Provisions

as per attached

## Reasons

as per attached

# Notice of Submission on a Private Plan Change – Christchurch City Council

***Submission made by electronic means***

## 1. SUBMITTER DETAILS

**Name of Submitter:** Canterbury Regional Council (**Environment Canterbury**)

**Physical Address:** 200 Tuam Street

**Postal Address:** PO Box 345

**Email Address:** regional.planning@ecan.govt.nz

**Telephone:** 027 256 1761

**My Address for service for receiving documents and communication about this application is:** by email

## 2. APPLICATION DETAILS

**Application Reference Number:** Whisper Creek Private Plan Change (PC23)

**Name of Applicant:** LMM Investments 2012 Limited

**Application Site Address:** 144, 156 and 176 Turners Road and 220 and 240 Spencerville Road, Marshlands.

**Description of the Proposed Activity:**

The proposed private plan change seeks to rezone 170 hectares at Turners and Spencerville Roads to enable around 800 homes and a neighbourhood centre.

Most of the land would shift from Rural Urban Fringe and Open Space – Golf Resort to Residential New Neighbourhood, while the Open Space – Waterway and Margins Zone along the Styx River would be retained. Land within the High Flood Hazard Management Area would stay zoned Rural Urban Fringe.

## 3. SUBMISSION DETAILS

This is a submission on Private Plan Change 23 to the Christchurch District Plan.

We submit a neutral submission on the proposed plan change.

Environment Canterbury could not gain an advantage in trade competition through this submission.

**The reasons for our submission are:**

Out of sequence development

3.1. Environment Canterbury acknowledges that policy 8 of the National Policy Statement on Urban Development (**NPS-UD**) requires Local Authorities to be responsive to plan changes affecting urban environments that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is unanticipated by RMA planning documents or out-of-sequence with planned land release.

3.2. The following paragraphs highlight the risks and issues associated with out of sequence development which the Canterbury Regional Policy Statement (**CRPS**) seeks to manage.

3.3. The development site is not identified as an *existing urban are*, a *Future Development Area*, or *greenfield priority areas* in Map A of the CRPS, and in this way would not give effect to the policies and objectives of the CRPS.

3.4. Objective 6.2.1 in the CRPS sets out a recovery framework for Greater Christchurch. Of specific relevance to the proposal, the objective requires that urban development outside *existing urban areas* or *greenfield priority areas* be avoided, that strategic and other infrastructure services are integrated with land use development, and that land use optimises the use of existing infrastructure. Policy 6.3.1 implements this objective by requiring that new urban activities only occur within *existing urban areas* or identified *greenfield priority areas*, as shown on Map A.

3.5. The Infrastructure Report prepared by Davie Lovell-Smith sates that the development will be able to connect to the reticulated wastewater network, however proactive maintenance will need to occur.[1] Upgrades to existing wastewater infrastructure may also be required as part of the development. Capacity constraints prevent the development from connecting to reticulated drinking water supply and a new supply will need to be arranged. The development will also be unable to connect to the existing reticulated stormwater network and instead will require retention and treatment onsite.

3.6. The proposal is also inconsistent with policy 6.3.4 of the CRPS, which seeks an efficient and effective transport network by providing patterns of development that optimise the use of existing network capacity and, where possible, support increased uptake of active and public transport. There are no public transport links to the development, and it is unclear if public transport could realistically be extended to the site in the future.

[1] Appendix B in the notification documents.

3.7. Objective 5.2.1 requires that development is located and designed so that it functions in a way that achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth. As aforementioned, the development site is not within an *existing urban area*.

3.8. Whilst not insurmountable challenges, these issues demonstrate the risks associated with out of sequence development. Unplanned development can result in land use patterns that are disconnected from the intended urban form and supporting infrastructure, making it harder to achieve consolidated and efficient growth. Areas identified on Map A as *greenfield priority areas* or *Future Development Areas* have been selected because they are appropriate areas for development to occur. In contrast, unplanned development risks placing growth in locations that are not appropriate, which can lead to poor urban form, higher infrastructure costs, poor environmental outcomes, and greater exposure natural hazards.

<u>The presence of a natural hazard</u>

3.9. Policy 11.3.1 requires the avoidance of development in *high hazard areas*. The application does not currently propose any residential development within the *High Flood Hazard Management Area* which covers the southeastern portion of the site, but this will be important to manage if the proposal changes. The *High Flood Hazard Management Area* should retain Rural Urban Fringe zoning, which is consistent with the policy direction in the CRPS.

<u>Incomplete ecological significance assessment</u>

3.10. The conclusions drawn in the Ecological Impact Assessment prepared by Viridis regarding the ecological significance of the site are not supported by an assessment of the relevant criteria.[2] Policy 9.3.1 of the CRPS requires that significance, with respect to ecosystems and indigenous biodiversity, is assessed using the criteria listed in Appendix 3 of the CRPS. The ecological impact assessment does not assess significance using the criteria in Appendix 3.

<u>The presence of contaminated or potentially contaminated land</u>

3.11. There is a HAIL site at 165 Turners Road which is on the Environment Canterbury Listed Land Use Register but is not identified in the Section 32 Report or the associated Preliminary Site Investigation (PSI). Policy 17.3.2 requires that where new subdivision, use, or development of actually or

[2] Appendix H in the notification documents.

potentially contaminated land is proposed, a site investigation is to be undertaken to determine the nature and extent of any contamination. The PSI provided does not determine the nature and extent of contamination on the site.

Impacts on freshwater

3.12. Residential development of the site may impact both surface and groundwater quality. Policy 7.3.7 of the CRPS requires that any adverse effects on freshwater quality from changes in land use be avoided, remedied or mitigated. This should be done by controlling changes in land uses to ensure water quality standards are maintained.

3.13. The subject site is located above the coastal confined gravel aquifer system and has shallow depth to groundwater, including the upper terrace where residential development is proposed to occur. The lower terrace where stormwater basins are proposed has the shallowest depth to groundwater of the site. The proposed location of constructed basins and wetlands for stormwater treatment and attenuation within the *High Flood Hazard Management Area* is a concern, as this will compromise the functioning of these systems during large rain events.

3.14. There are multiple waterbodies on the site including wetlands and the Spencerville Drain. The Styx River runs along the southeastern boundary of the site and is listed as a *Site of Ecological Significance* in the Christchurch District Plan. The characteristics of the site will require careful management to ensure water quality is protected.

Regional Council Responsibilities

3.15. Resource consents from Environment Canterbury may be required for the development and operation of the site. The applicant will need to undertake their own assessment if the private plan change is approved. Based on the information currently available, the following resource consents may be required:

- Earthworks and vegetation clearance
- Discharge of construction-phase stormwater, operational-phase stormwater, dewatering water, and/or flocculants if used
- Take of groundwater for dewatering or the use of potable water
- Works in or around wetlands under the National Environmental Standards for Freshwater (**NES-F**)
- Dust discharges under the Canterbury Air Regional Plan (**CARP**).

3.16. The characteristics of the site, for example the shallow depth to groundwater, indicate that securing the necessary resource consents to enable development, could prove difficult and potentially involve significant costs or mitigation requirements. However, the information provided does not allow a definitive assessment at this stage. The ability of the developer to obtain resource consent(s) from Environment Canterbury for activities necessary to develop the site pursuant to the proposed rezoning, will impact the feasibility of the development and the appropriateness of the private plan change.

**The decision we would like the Council to make is:**
Environment Canterbury requests that the concerns identified above are addressed.

## 4. SUBMISSION AT THE HEARING

We do wish to be heard in support of our submission

## 5. SIGNATURE

**Amanda Thompson**
**Team Leader Planning & Strategy** **17 November 2025**

# Appendix 1 – Definitions

The *existing urban area* is not defined in the Canterbury Regional Policy Statement but is delineated on Map A.

*Future Development Area* means an area identified on Map A as a Future Development Area.

*Greenfield priority area* means an area identified on Map A for greenfield development.
*High hazard areas* are:

1. flood hazard areas subject to inundation events where the water depth (metres) x velocity (metres per second) is greater than or equal to 1, or where depths are greater than 1 metre, in a 0.2% AEP flood event;
2. land outside of greater Christchurch subject to coastal erosion over the next 100 years; and
3. land within greater Christchurch likely to be subject to coastal erosion including the cumulative effects of sea level rise over the next 100 This includes (but is not limited to) the land located within Hazard Zones 1 and 2 shown on Maps in Appendix 5 of this Regional Policy Statement that have been determined in accordance with Appendix 6; and
4. land subject to sea water inundation (excluding tsunami) over the next 100 years. This includes (but is not limited to) the land located within the sea water inundation zone boundary shown on Maps in Appendix 5 of this Regional Policy Statement.

When determining high hazard areas, projections on the effects of climate change will be taken into account.

*High Flood Hazard Management Area* is defined in the Christchurch District Plan as an area subject to inundation events where the water depth (metres) x velocity (metres per second) is greater than or equal to 1, or where depths are greater than 1 metre, in a 0.2% AEP (1 in 500-year) flood event (as identified in the Canterbury Regional Policy Statement, Chapter 11) and shown on the planning maps.

*Site of Ecological Significance* means a site that is listed in Schedule A of Appendix 9.1.6.1 to the Christchurch District Plan.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** George **Last name:** Nimmo

**Organisation:** Ouruhia Residents Group

**Prefered method of contact**

**Postal address:** 153 Turners Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** George.nimmo@xtra.co.nz

**Daytime Phone:** 0279250117

**Mobile:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
Refer to attached submission

**Reason for Decision Requested:**

### Specific Provisions

Refer to attached full submission.

### Reasons

Refer to attached submission

**Private Plan Change 23 Whisper Creek**

**Ouruhia Residents Group Submitters**

| Name | Address | Signature |
|---|---|---|
| George Nimmo | 153 Turners Rd, Ch Ch | |
| Heather Nimmo | 153 Turners Rd, Ch Ch | |
| Tammy Wells | 103 Turners Road Chch 8083. | |
| Michael Wells | 103 Turners Rd Ch Ch 8083 | |
| Leith Wells | 119 Turners Rd, Chch 8083 | |
| Kerry Wells | 119 Turners Rd, CHCH 8083 | |
| Steven A Baker | 147 Spencerville Rd | |
| Kay Baker | 147 Spencerville Rd 8083 | |
| Stephanie Blackler | 140 Turners Rd | |
| Ian Blackler | 140 Turners Road | |
| Rowena Watson | 103A Turners Road | |
| Kristin Buxton | 18 Turners Road | |
| Lyndy Maurice | 266 Spencerville Road | |
| Karen Winter | 402 Lower Styx Road. | |
| Ross Winter | 402 Lower Styx Road. | |
| Debbie Ling | 18 Teapes Rd ouruhia | |
| Conrad Ling | 18 Teapes Rd, Ouruhia | |
| Renee Ling | 18 Teapes Rd, Ouruhia. | |
| Andrew Buxton | 18 Turners rd ouruhia | |
| Judy Mayhew | 129 Turners Road ouruhia | |
| Bruce Mayhew | 129 Turners Rd Ouruhia | |
| COLIN MITCHELL | 16 TURNERS RD OURUHIA | |
| Jenny Knight | 247 Spencerville Rd | |
| Sarah Marshall | 81 Turners Road | |
| Brent Marshall | 81 Turners Road | |
| Dominic Lowe | 209 Spencerville Rd | |
| John Messerly | 123 Turners Road | |
| Svetlana Messerly | " " " | |
| Leneke Cox | 69 Turners Road | |
| JAMES HARDY | 65 TURNERS ROAD | |

**Private Plan Change 23 Whisper Creek**

**Ouruhia Residents Group Submitters**

| Name | Address | Signature |
|---|---|---|
| Deborah Hardy | 65 Turners Road | |
| Maureen Kirk | 185 Turners Road. | |
| Anna Robinson | 250 Spencerville Road | |
| Ann Nichols | 163 Turners | |
| Arndt Walker | 133 Turners Road | |
| Madison Walker | 133 Turners Road | |
| IAN WALKER | 133 Turner Road | |
| Steve Gray | 63 Te Rito St. | |
| Karen Gray | 63 Te Rito St | |
| John Wilson | 4 Te Kerene St. | |
| Dianne Winegge | 8 Flaxgrove Place | |
| Jill Comb | 51 Te Rito St | |
| CAROLE GIBSON | 8 KALEEE AVE | |
| KATH WIKOREW | 3, Ruahine Place Tamarapark | |
| Tracy Stewart | 62 Te Korari Street | |
| | | |

**Private Plan Change 23 Whisper Creek**

**Ouruhia Residents Group Submitters**

| Name | Address | Signature |
|---|---|---|
| L.G Clark | 1143 Turners Road | L.G Clark |
| Tony Clark | 1143 Turners Road | T. W. Clark |
| Eve Orlowski | 1A3A Turners Road | |
| Racal Nevin. | 20 Teapes Road, | |
| Jeremy Collins | 405 Pages road | |
| Vicki Hyland | 30 Redruth Ave, Spreyton. | |
| Crystal Collins-Johnson | 1126 Brighton Rd | |
| Heather Collins | 405 Pages RD | H R Collins |
| | | |
| | | |
| | | |

**Private Plan Change 23 Whisper Creek Residential**

**Name of Submitters**

Ouruhia Residents and Supporters Group – (See attached signatures)
Contact: George Nimmo
Email: George.nimmo@xtra.co.nz
153 Turners Road
Ouruhia
Christchurch 8083

**Submission Details**

**We oppose all of the application**

## Application to which submission relates

1. This is a submission on an application by LMM Investments 2012 (the applicant /the proposal)

This submission relates to the section 32 evaluation of the plan change and all related documents submitted by LMM and documents prepared by the Christchurch City Council (CCC) and any other relevant documents.

The submitters oppose all aspects of the proposal

## Relevant part(s) of the application

2. This submission relates to the entire proposal

## Effects of the Proposal

**3.** The key concerns and multiple adverse effects for the environment and community as follows…

**4. The site and surrounding environment**

4.1 The submitters point out that the application omits including the following important points related to the site and surrounding environment when consideration is to be given to building 800 new houses in this location.

4.2 The subject land is located very close to the sea. It is 1.3km southwest of the sea and closer to the Brooklands Lagoon, the waterway which forms part of and is adjacent to the mouth of the Waimakariri river mouth. An obvious adverse effect of the proposal is putting more residential houses in close proximity to sea level rise during climate change.

4.3 A further adverse effect is that the site is located in an area suspectable to increased natural hazards identified since the Canterbury Earthquakes in 2010/12. Importantly it is located in the tsunami zone illustrated in recent Council civil public sessions with Helen Jack. www.cdemcanterbury.govt.nz/hazards/tsunamis

4.4 The URS New Zealand Engineering and Environmental report on geology of the specific site for the Golf Links proposal highlighted the liquefaction susceptibility of the site to lateral spread. In addition, the proposed excavation and creation of wetland and lake in the eastern section of the site may increase the likelihood of lateral spreading issues due to the reduction of lateral constraint.

4.5 The canterbury Earthquake reports on the area show this is exactly what happened. What effective design to mitigate against the potential effects of liquification and lateral spread will specifically be undertaken in this development? https://www.tandfonline.com/doi/full/10.1080/00288306.2016.118292

## 5. To repurpose the no longer viable golf resort outcome.

5.1 The submitters are concerned that LMM picked out the most economically viable parts of the golf resort proposal and discarded important aspects decided under that decision. In particular discarding the decision to use Lower Styx Road as the safest and most effective main entry and exit point to the site and ecological reserve.

## 6. Impact on roads and increased traffic movements

6.1 The submitters point out the proposal does not demonstrate how it will adequately address and better deliver the objectives and policies of the Christchurch District Plan (CDP) in relation to transport outcomes in comparison to the specific purpose Golf Resort zone. It does not assess the consistency of the rezoning against the relevant higher level planning documents to an acceptable level. This was requested by the Council in its request for further information dated 11 June 2025.

6.2 The submitters consider the LMM in its reply to this request in the letter dated 7 July 2025 to be inadequate. The reply cites that because no transport-related adverse effects were identified in its transport assessment, in appendix E, they consider the proposal to be within the strategic policy direction regarding transportation matters.

6.3 The submitters are concerned that the proposal's transport assessment does not demonstrate sufficient evidential assessment and proof that it meets many aspects of the CDP and/or relevant objectives, policies and outcomes of the following higher order planning instruments and strategies namely:

- *Canterbury Regional Policy Statement including the relevant transport objectives and policies in Chapter 5 and 6*
- Greater Christchurch Spatial Plan
- Greater Christchurch Transport Plan
- Canterbury Regional Land Transport Plan 2024

- Future Transport Ōtautahi Christchurch

In addition, the submitters consider there will be adverse transport related effects.

**Lower Styx Road Access**

6.4 The submitters point out that under the rules in the CDP (13.9.5.1 (a)) for the Specific Purpose (Golf Resort) Zone Whisper Creek stipulates that the accessways would involve a major entrance off Lower Styx Road, an entrance off Spencerville Road and a service road off Teapes Road with restricted access.

6.5 The submitters are concerned that in the proposal, road access is unsafe and inadequate and will have adverse effects because the proposal does not include road access off Lower Styx Road thus this breaches rule 13.9.5.1. above.

6.6 The development of the site was blocked until the intersection of Lower Styx Road and Marshlands Road was signalized, this has now occurred. This option has already been established as the main road access to the development as it is a minor arterial road in the city hierarchy road under the scheme for the required traffic volume in the Golf Resort plan. There will be a higher volume of traffic under the proposal which makes access via Lower Styx Road essential.

6.7 The submitters believe that the ecological value of the land adjacent to the Styx River and in particular the *Source to Sea* walkway project must not be used as a reason for not constructing the bridge across the Styx River as required under the rules for the Golf resort. It should be noted that the Styx River *Source to Sea* project has spasmodic adjacent access to the river edge from the source of the Styx River. This means direct river edge access is not required in this section of the river to fit in with any overall *Source to Sea* accessway adjacent to the river.

6.8 The submitters point out that if a walkway is planned adjacent to the river there can be a tunnel walkway under the new bridge similar to that used in other locations.

6.9 The submitters further point out that the Styx River is recognised as extremely degraded ecologically. No ecological level of significance criteria would warrant changing a transport access to an 800-housing development by excluding a bridge to facilitate access to the housing in order to preserve the ecological significance of the river or adjacent wetlands areas.

6.10 The submitters believe that a main access route off Lower Styx Road is essential to minimize adverse transport-related effects. Including daily congestion, increased crash risk and treacherous exit provisions in light of an urgent excavation in a Tsunami civil defense emergency.

6.11 The main access way off Lower Styx Road is essential to minimize adverse vehicle access and wider transport-related effects. It is pointed out that Lower Styx Road is in better condition than Spencerville, Teapes and Turners roads. Especially given the proposal does not plan on upgrading these roads.

6.12 The submitters are concerned that the proposal states that there will be 720 traffic movements in the AM and PM peak traffic time which is well below the expected level given the two cars plus per household reality in Christchurch. The submitters believe 1600 car movements are a closer estimation, with a total daily movement of 6,560, (applicants' calculation). Turners Road is currently designed for 650 cars per day.

6.13 The submitters are further concerned, that the likely high number of multiple person households in the new development will further impact the number of vehicle movements. This proposal for use of the small local road network does not have the capacity to safely accommodate an 800-household increase in traffic. The local roads are in no state to accommodate that increased volume of traffic. Roads would require significant upgrades.

6.14 The submitters are also concerned that the three access roads proposed are in dangerous positions. Access will not have sufficient space to view traffic travelling from the West given its proximity to the corner on Spencerville Road. Further, the access road will compound the safety of the other roads proposed.

6.15 The Proposal's access roads onto Spencerville Road will have adverse traffic and traffic safety effects on the roading network due to the increased number of vehicles accessing the allotments off Spencerville Road. Spencerville road is a narrow local road, with limited streetlights and no footpaths, not designed for this volume of use.

**Spencerville Road**

6.16 The submitters point out this road is classified in the scheme as a collector road. It is designated as a low volume local road below the width required by the roading standards. A collector road reflects a lesser dominance of through traffic and a greater role in servicing activities along the route. There are only 14 houses along the road.

6.17 In places the road is not in line with its survey pegs. For example, on the corner of Turners and Spencerville roads on the north side the road is 8 metres away from the survey pegs.

6.18 The submitters point out that the rail crossing on Spencerville Road is inadequate because the approach on both sides are on an angle and the crossing is on a ridge and very rough. This is below standard for any increased volume of traffic.

6.19 The submitters point out that in addition, it is formed as a narrow rural road with 5 metres width of seal with limited shoulders and no footpaths. The bends and undulations in Spencerville Road limit site distances. There is a one-way bridge at the Spencerville end of the road with approaches that give very poor visibility of approaching traffic.

6.20 The intersection of Spencerville and Marshland's Road (Chaney's Corner) is a very dangerous intersection and is of serious concern, even more so if traffic volumes utilising this intersection increase. This is partly because of its geometry and partly because of the inadequacies of the sight line over the rail crossing on Marshland Road, a little to the south of the intersection. Therefore, Chaney's corner will require significant upgrading to the extent of traffic lights and other safety work.

6.21 The submitters point out that these safety difficulties at the intersection on Spencerville/Marshland Road currently force more traffic onto the safer Turners Road. This is reported as happening already by long-term residents of the area.

6.22 The submitters consider the proposals modelling of traffic is deficient. A proposal for such an increased volume of traffic means Spencerville Road use will increase significantly. Spencerville Road will simply not be able to safely service an 800-household increase in its present state. This will require re-alignment and widening to support and cope with this increased volume of traffic.

6.23 The submitters point out that during weekend events at Spencer Park traffic is bumper to bumper on this road. It is the main access from the north to the Councils camping ground at Spencer Park and the volume increases in the summer months.

6.24 The Proposal underestimates the increased use of the one- way bridge on Spencerville Road. Residents will use this bridge in order to access Lower Styx Road to the city. In addition, the bridge provides access to recreational areas such as Spencer Park and Bottle Lake Forest. This bridge would need to be upgraded to a two- lane bridge.

The submitters consider this is a totally unworkable solution for traffic access to the wider city and Canterbury region.

6.25 The submitters point out that most residents will want to take the easiest road access to the motorway to the city for work and other services. This will be via Lower Styx Road to the on ramp at Belfast Road and will be facilitated by the controlled intersection at Marshland Road.

6.26 Alternatively, the submitters point out there will be a significant increase on Marshland Road to access the city.

6.27 In addition, the lack of public transport in this area must be taken into consideration. The one bus route stopped servicing Spencerville in 2019, consequently there is no public transport in the area.

6.28 The submitters are concerned that effect of the traffic proposal will cause adverse effects such as loss of amenity, adverse environmental impacts and increased traffic volume, accidents, delays and noise.

**Turners Road**

6.29 The road is classified in the District Scheme as a low volume local road below the width required by the roading standards. There will be a significant adverse effect from the increase in traffic movements along Turners Road. The cost of upgrading this road will be substantial for the rate payer.

**Transport Summary**

Overall, the submitters point out that the current roading network is totally inadequate and will require substantial construction work to bring up to the required standards. Therefore, the accumulative costs to the City Council and ultimately the ratepayer of upgrading all aspects of the roads and wider upgrading including the two bridges will be substantial and has not been planned for in the City Council budget.

## 7. Natural Hazard Risk and Tsunamis – Adverse Effects

7.1 We submit that this proposal has a poorly planned transport plan which will increase the risk of citizens being able to quickly evacuate the area in face of a tsunami warning due to traffic congestion from 800 houses with insufficient road exit access. This breaches the Canterbury Regional Policy statement chapter 6. The policy explains in part that, “Poorly planned development can increase risk from natural hazards and the effects of climate change.”

7.2 In addition, the site is located in an area suspectable to increased natural hazards identified since the Canterbury Earthquakes In 2010/12. Importantly it is located in the tsunami zone. www.cdemcanterbury.govt.nz/hazards/tsunamis

7.3 **New Sea Level Research**
*(Marine Environment 2025 – Ministry for the Environment)*
The newly released Extreme Coastal flood maps for Aotearoa NZ identifies areas in the development to be likely subject to coastal flooding as well as inundation from the Styx River. The submitters suggest developing a Residential New Neighbourhood Zone this close to the coast is unwise.

7.4 **Finished Floor Levels**
The submitters are concerned that the proposed FFL of 12.49 CDD is too low given that following major rain fall the upper terrace can become inundated. The current Council requirement for FFL in this immediate area is currently 13.55 CDD and this should be set as the minimum FFL.

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## 8. Three Waters – Adverse Effects

### 8.1 Potable Water Supply

The Christchurch city council has confirmed that there is insufficient fresh water supply for this development from its network. The development proposal suggests the use of either existing bores or new ones, with an associated water treatment plant to meet the developments requirements. The submitters are concerned that the existing bores were meant to be removed following testing as part of the Golf Course proposal, which hasn't happened. Secondly this issue is in the domain of Ecan, which has over allocated fresh water supplies within the canterbury catchment, so any new development could have a negative impact on other wells nearby.

### 8.2 Waste Water

The submitters are concerned that this development is planning to use the Kainga/Spencerville waste water network, which does not have the capacity for an additional 800 houses. The system was designed to meet the Kainga, Brooklands and Spencerville areas needs and allow for storm peak factor margins including infiltration.

The Brooklands area has been red zoned which reduces the load on the network by approximately by 470 dwellings, however another approximately 50 dwellings have been added in the Kainga area which means a further 420 could be serviced theoretically. However, it has been identified that the pumping station efficiency has been markedly reduced from its original design of 40 litres per second to 29.95 litres.

The model that has been proposed assumes that after so called 'proactive maintenance', this could recover the pump performance. There is no evidence at this stage that this is possible. The model also ignores the fact that the main line water discharge network has been significantly damaged by the earthquake and the infiltration and inflow will be much higher than

what is allowed for in the calculations following the earthquakes and the slumping of land levels in the existing built areas. The potential 'surplus' capacity of the existing system would be much better used for infill housing and extensions of existing communities rather than a green fields site.

8.3 **Stormwater**

The submitters are concerned about the increase and rapidity of storm water discharge due to the significant increase in area of buildings and hard stand areas into the retention ponds, which in turn flow into the Spencer Drain. The basins provided appear to be too small and being placed in the flood zone means they can easily become inundated in a major event. The Spencer Drain, which is the only major discharge route is 3000 metres long, but only has a fall of half a metre giving a gradient of 1/6000. This is entirely inadequate to deal with the current storm water discharge, let alone the increase in rate caused by the newly built hard standing areas and roofs.

There are two further factors which have not been considered by the applicant.

- The pumping station is the only effective route which storm water can be disposed of into the Styx River in a storm event. These pumps have not been considered in the model provided.
- The level of the Styx River is controlled by the flood gates at its terminus. These gates are opened and closed on tidal flows and when the Waimakariri is in flood they can remain closed, which allows the Styx River to breach the stop banks and cause extensive flooding. The submitters need to be satisfied that these are addressed prior to any approval. The flood gates need to be upgraded to mechanical control, accompanied by additional pumps.

## 9. Ecology – Further Adverse Effects

9.1 **Styx River Corridor**

The greater Styx River corridor is home to a range of endangered species, including lizards/geckos, eels, lampreys and a variety of birds. The application has no comprehensive plan for the protection of species or their relocation, including alternative foraging and nesting sites. The submitters would recommend the flood plain, which is currently grazed and is a source of faecal contamination during flood events should not be rezoned to Rural Urban Fringe but to a Conservation Zoning and be a condition of any approval if it was decided to allow the private plan change. Additionally, this would open up the site for community and ecological benefit rather than be off limits as proposed.

9.2 The Styx River is significantly degraded and the most recent survey of the river was undertaken by Boffa Miskell on behalf of the Christchurch City Council in 2023. It is interesting to note that the applicants ecological impact assessment does not reference this report, which demonstrates an ongoing deterioration in the river, with increasing levels of zinc and other metals.

"Elevated zinc concentrations can reflect the urbanisation of catchments

(e.g., galvanised roofing and spouting can be major sources of zinc). Best practice stormwater management techniques should be prioritised where urban development is increasing. Untreated, or poorly treated, stormwater can bring contaminants into waterways, which can be toxic to freshwater fauna. This is especially important for the Pūharakekenui / Styx River catchment where EPT taxa, including mayflies still occur." (*Pūharakekenui Styx River catchment, Five-yearly and annual aquatic ecology monitoring. Prepared for the Christchurch City Council by Boffa Miskell. 4 September 2023).*

Fine sediment continues to be a major concern in the catchment. Increases in embeddedness, sediment depth and fine sediment cover even over larger substrates at a number of monitoring sites are also having a major negative impact on the river. High levels of fine sediment are well known for reducing the macroinvertebrate richness and productivity and ecosystem health of rivers.

"... changes in substrate composition, and particularly increased cover and depth of fine sediments means coarser substrates, like cobbles, are less available to aquatic biota (for grazing, egg laying, using as refugia)." (Pūharakekenui Styx River catchment, Five-yearly and annual aquatic ecology monitoring. Prepared for the Christchurch City Council by Boffa Miskell. 4 September 2023).

Sediment pollution in urban catchments elsewhere in Christchurch is becoming more widely recognised (Heathcote Habitat Headache? Rock habitat limitation for aquatic macroinvertebrates in the Opawaho Heathcote River. Ocean Simard, Waterways Postgraduate Student Conference, 12 November 2025).

**Unfortunately, the use of ponding systems to help control flood pulses currently used in stormwater treatment in urban environments is most likely contributing to this fine sedimentation problem. At present this issue is not recognised. (Impact of the Opuha dam on the turbidity and health of the Opuha and Opihi Rivers. Rankin and Barrett. Journal of Hydrology (NZ), in press)**
**The current methods of attempting to deal with both these issues have proved ineffective, and if this development was to proceed it would only worsen the current degradation.**

## 10. Community Amenity Issues – Further Adverse Effects

### 10.1 Urbanisation

The submitters are concerned that this development will increase the number of houses in the Ouruhia area by 1330%. Rather than having a bucolic outlook, there will be an intensive urbanisation of homes on small sections, which is in contrast to the surrounding area, where individual sites or single houses are usually around 1000 square metres with an open environment.

| Census Dwellings per Square Kilometre 2023* | | | |
|---|---|---|---|
| **Area** | **Total Dwellings** | **Area Square Kilometre** | **Dwelling per Square Kilometre** |
| Ouruhia | 60 | 2.67 | 22.5 |
| Brooklands-Spencerville | 267 | 7.25 | 36.8 |
| Marshlands | 228 | 7.99 | 28.5 |

**Census data is rounded to a multiple of 3 to protect individual anonymity. Summing across categories can therefore lead to compounded errors and totals not equaling 100%.*

The proposal has no controls over the visual aspects of the design and construction of the homes, unlike the Golf proposal, which had strong design elements to blend into the surrounding countryside with wide open space with set backs of 50 to 100 metres from roads and surrounding properties. This proposal only has a 5-metre strip around the development, and 10 metre setbacks to buildings, which is entirely inappropriate in a rural area. Additionally, there are no lighting plans to protect the night sky with low lighting street lights. Unlike the Golf resort proposal there is only a very small increase in public access to the river and flood plain area, but no proposed improvement in the road side swales for drainage or footpaths, which are important for residents, including school children.

### 10.2 Reverse Effects

This is primarily a rural farming area with a significant number of rural associated vehicle movements, including tractors and truck and trailer units on a daily basis. During the summer irrigation is undertaken 24/7 which inevitability does result in some noise as well. With disproportionate urban development this could result in difficulties between residents and the farming community.

### 10.3 Commercial Area

The proposal includes a commercial area, but no associated guidelines as to the activities which will be permitted. The submitters see that the hours of operation and the type of activities undertaken are directly related to the community and should not include antisocial or toxic activities. E.g. public bars, liquor store, vape shops etc.

## 11. Economic Benefits

The proposal outlines a list of supposed economic benefits for the community. The submitters would contest, that these are exaggerated as this proposal is only a one-off exercise, whereas the previous golf course was an ongoing business employing a large number of people and improving the ecological and social environment for the community. This proposal places a large urban development crammed into a narrow terrace with no support structure e.g. public transport, library, medical centre or

swimming pool. The submitters see that this development is negative to both the environment and local community.

**12. Broadcasting transmitter and mast situated at 143 Lower Styx Road – Further Adverse Effects**

The submitters are concerned that this proposal will have a very large and concentrated area of housing close to the radio mast which is 137 metres high. It has been shown that such towers do cause potentially harmful radio frequency fields to human health. For this reason, the original consent allowed its construction as "this particular location is reasonably isolated from surrounding houses and about 700 metres from the nearest road". The council has accepted in the past that a rural zone is appropriate for such masts.

An article by respected scientist Dr. Neil Cherry, outlined the dangers associated with high radio frequencies. It was never envisaged that a high-density housing development would be built so close to the aerial and should not allowed to proceed. (*Health Effects in the vicinity of Radio/TV towers and mobile phone base stations. Dr Neil Cherry O.N.Z.M. Associate Professor of Environmental Health. 6th September 2002).*

**13. Construction - Further Adverse Effects**

The submitters are concerned regarding the potential noise, dust and general nuisance to be caused by this development if it were to go ahead. There needs to be a sequenced development plan with strong environmental and construction controls if the proposal is approved. We would submit, that prior to any construction or development of the facilities that the bridge over the Styx River be constructed and this be the only entrance to the development during construction. The volumes of fill required will involve thousands of truck loads, which will be entirely unsuitable for the road network and be deleterious for the health and welfare of the residents. Unlike the golf course where there was only internal movement of fill. This project will require substantial fill from outside sources, which can result in contamination to the site here and ultimately the river. If the development was to be approved there needs to be frequent and independent monitoring of all materials entering the site.

Hours of work need to be restricted to 7 a.m. – 6 p.m. Monday to Friday and 7 a.m. -12 noon on Saturday.

**14. Demand**

The proposal suggests there is a high demand for development in this area, however, no evidence is provided. In fact, because of the red zoning of Brooklands and associated earthquake damage to the area there is a natural caution from potential buyers to commit to this area. The CCC has already made it clear that in its long-term plan it has identified sufficient land zoned for development for the next 30 years. Together these issues negate the submission by LMM regarding potential demand for a subdivision which has many negating factors for approval including transport, flooding and inundation, lack of infrastructure, and poor geological history.

**15. Cultural Values**

Local Ngai Tahu members have raised the issue of a traditional pathway between Ngai Tuahuriri Pa to the sea. As there appears to have been no significant archaeological study of the area, this needs to be completed prior to any development. We have written to Ngai Tahu regarding this matter and are awaiting their reply.

**16. Contamination – Further Adverse Effects**

The contamination report provided to the submitters is deficient in a number of areas.

These include the fact that part of the upper terrace along Turners Road has been and is actively market gardened. Historically this farm has also produced on the lower levels horticultural crops e.g. potatoes, onions etc. Additionally, the Boffa Miskell report (2004) identifies further potential areas of contamination not included in the applicants' report.
Further significant independent testing for contamination should be undertaken before any development and be remediated.

**17. Consultation**

There has been no broad consultation with the community. We do understand that there has been some interaction between the developer and at least some of the owners of the 4-hectare blocks which he is attempting to rezone. This is in stark contrast with the developers of the previous Special Purpose Golf Course developers who did consult quite widely with the community.

**18. Economic Feasibility**

It should be noted that the applicant is only able to demonstrate ownership and control of 63.79 hectares of the total area of 170 hectares of the proposed rezoned land. This raises the issue of how the applicant is going to reach the 800-section threshold and whether the development is able to be completed.

## Form 5 – Submission on a Publicly Notified Plan Change

Christchurch District Plan – Resource Management Act 1991

### 1. Plan change name & number

Private Plan Change 23 – Whisper Creek (PC23)

### 2. Submitter Details

| | |
|---|---|
| Full name of submitter: | Ouruhia Residents Group,<br>Contact George Nimmo, |
| Street Address: | 153 Turners Road,<br>Ouruhia,<br>Christchurch 8083 |
| Contact phone number: | 0279250117 |
| Email: | George.nimmo@xtra.co.nz |
| Address for service: | 153 Turners Road, Ouruhia, Christchurch 8083 |

### 3. Submission Details

☒ Oppose all or part of the application

The specific provisions of the plan change that my submission relates to are:

- Refer to attached full submission.

The decision I would like the Council to make is:

- Refer to attached submission

### 4. Trade Competition

☒ I am not a trade competitor of the applicant.

### 5. Hearing of this application

☒ We wish to speak in support of our submission

### 6. Signature (not required for electronic submission)

Signed: _____ Date: 17 November 2025_____

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Kristin and Andrew **Last name:** Buxton

**Prefered method of contact**

**Postal address:** 18 Turners Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** kristin_holder@hotmail.com

**Daytime Phone:** 027 378 6079

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
see attached

**Reason for Decision Requested:**

## Specific Provisions

see attached

## Reasons

see attached

# SUBMISSION ON PROPOSED PLAN CHANGE 23

# TO

# CHRISTCHURCH CITY COUNCIL

RMA FORM 5

# Submission on publicly notified Proposed Plan Change 23 to the Christchurch City Council District Plan

**Clause 6 of the First Schedule, Resource Management Act 1991**

To: **Christchurch City Council**

1. **Submitter details:**

| | | | |
|---|---|---|---|
| **Full Name** | Kristin Buxton and Andrew Buxton | | |
| **Company/Organisation** *if applicable* | n/a | | |
| **Contact Person** *if different* | Kristin Buxton | | |
| **Email Address for Service** | kristin_holder@hotmail.com | | |
| **Address** | 18 Turners Road<br>Ouruhia | | |
| | ***City***<br>Christchurch | | ***Postcode***<br>8083 |
| **Address for Service** *if different* | ***Postal Address*** | | ***Courier Address*** |
| **Phone** | ***Mobile***<br>027 378 6079 | ***Home*** | ***Work*** |

2. This is a ***submission*** on the **Proposed Plan Change 23 to the District Plan** for Christchurch City Council

3. We **could not** gain an advantage in trade competition through this submission.

   If you could gain an advantage in trade competition through this submission please complete point four below: n/a

4. We are **directly affected** by an effect of the subject matter of the submission that:

   (a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

*Note:*

*If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.*

5. We **wish to be heard** in support of my submission.

6. We **would** consider presenting a joint case with other submitters, who make a similar submission, at a hearing.

Please complete section below (insert additional boxes per provision you are submitting on):

| **The specific provision of the proposal that my submission relates to:** |
|---|
| See attached |
| **Do you: Support? Oppose? Amend?** |
| See attached |
| **What decision are you seeking from Council?**<br>**What action would you like: Retain? Amend? Add? Delete?** |
| **Reasons**: |
| See attached |

## 1. SUBMISSION – DECISION REQUESTED

Christchurch City Council (**CCC**) has notified Private Plan Change 23 (**PC23**) to the Operative District Plan. This proposed Private Plan Change relates to land at 144, 156 and 176 Turners Road and 174, 220 and 240 Spencerville Road and 161 Lower Styx Road.

The proposed Private Plan Change seeks to enable residential development at 144, 156 and 176 Turners Road and 174, 220 and 240 Spencerville Road.

It is anticipated that 800 households and a neighbourhood commercial centre could be developed. If the rezoning is approved the scope of the private plan change includes:

- To rezone operative Special Purpose Golf Resort Zone and Rural Urban Fringe Zone upper terrace sites to Residential New Neighbourhood Zone; and
- To rezone lower terrace areas subject to the High Flood Management Area from Special Purpose Golf Resort Zone to Rural Urban Fringe Zone;
- To enable a Neighbourhood Centre to be located at the site;
- Retain the existing Open Space Waterway and Margins Zone along the Styx River; and
- Amend provisions in the Christchurch District Plan that are relevant to the site, including inserting a new Outline Development Plan to guide development of the site

This submission sets out overall response to the public notification of PC23 which is that we seek it is **declined** and that the current zoning of all the land remain. We make this submission for the following reasons:

The proposed rezoning will be a significant departure from the currently allowable development and use of land provided under the Special Purpose Golf Zone as set out in the objectives of that plan change (PC14) as described below:

> *" Objective ….to provide golfing and associated facilities (including resort facilities) of international standard, bringing economic and social benefits to the City and region, and to provide other recreational opportunities, and limited residential development, within extensive open space and lake or riparian settings, with no significant adverse effects on the natural or adjoining rural environments…"*[1]

And as depicted below:

[1] PC14 – notification of proposed provisions of District Plan (https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Provisions/Plan-Change-14-HBC-NOTIFICATION-Sub-chapter-13.9-Specific-Purpose-Golf-Resort.pdf )

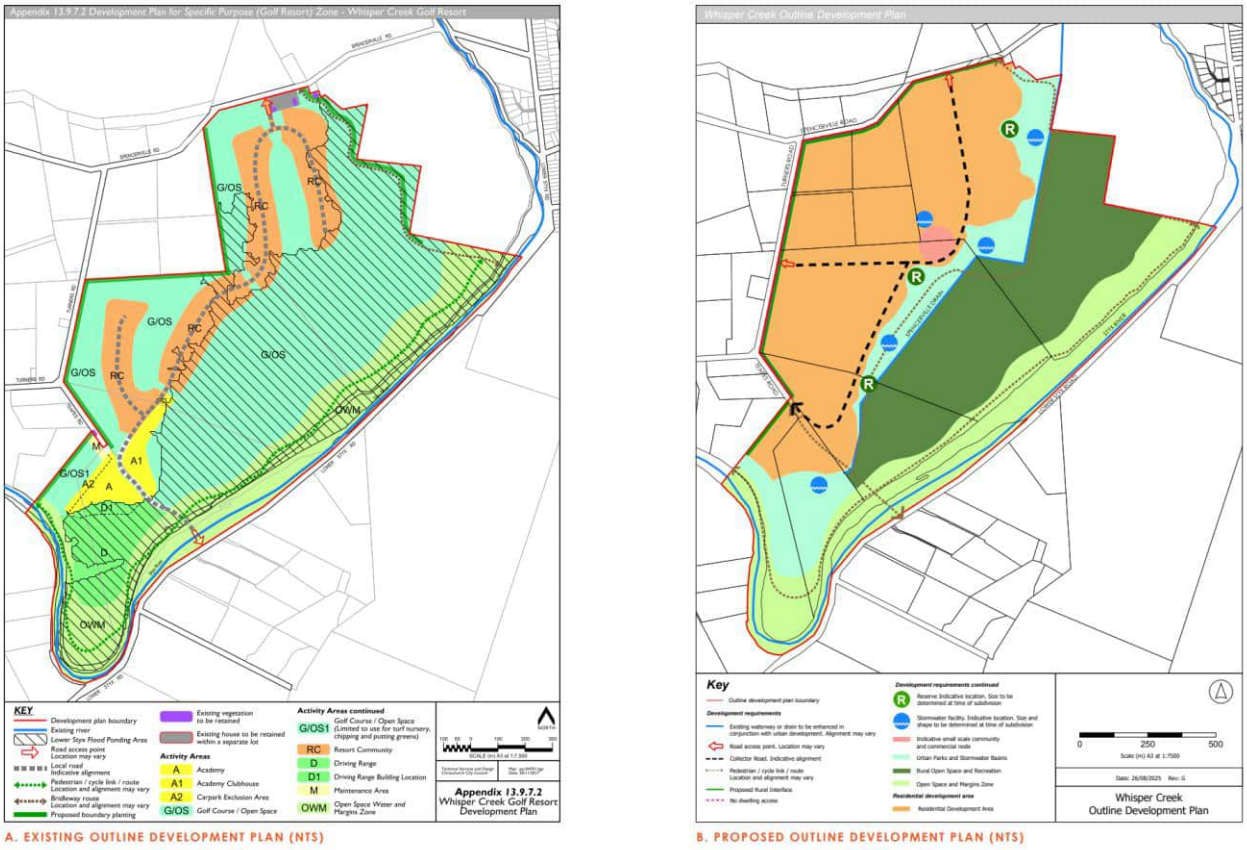


**Figure 1:** Left Image: Whisper Creek Golf Resort Development Plan showing areas of Golf Course, Open Space Water and Marin Zone, indicative local roading connections; and future subdivision (identified as RC - Resort Community) versus proposed zoning on right. Source: Applicant document set - )

The rezoning could allow a significant density of new residential and some commercial development on highly productive soils, within a natural hazard environment and which will adversely affect natural biodiversity values, as well as landscape and open space values. The proposal is not necessary to achieve outcomes sought by the National Policy Statement on Urban Development.

The proposal in relation to management of natural hazards is inconsistent with the District Plan's objectives and policies and overall objectives of the Resource Management Act. Parts of the land will be inundated in a 1% AEP event (100 year flood event) as indicated in Figure 2 below. The land has high groundwater and there may be adverse effects on groundwater values and levels from increased stormwater run-off from this development.

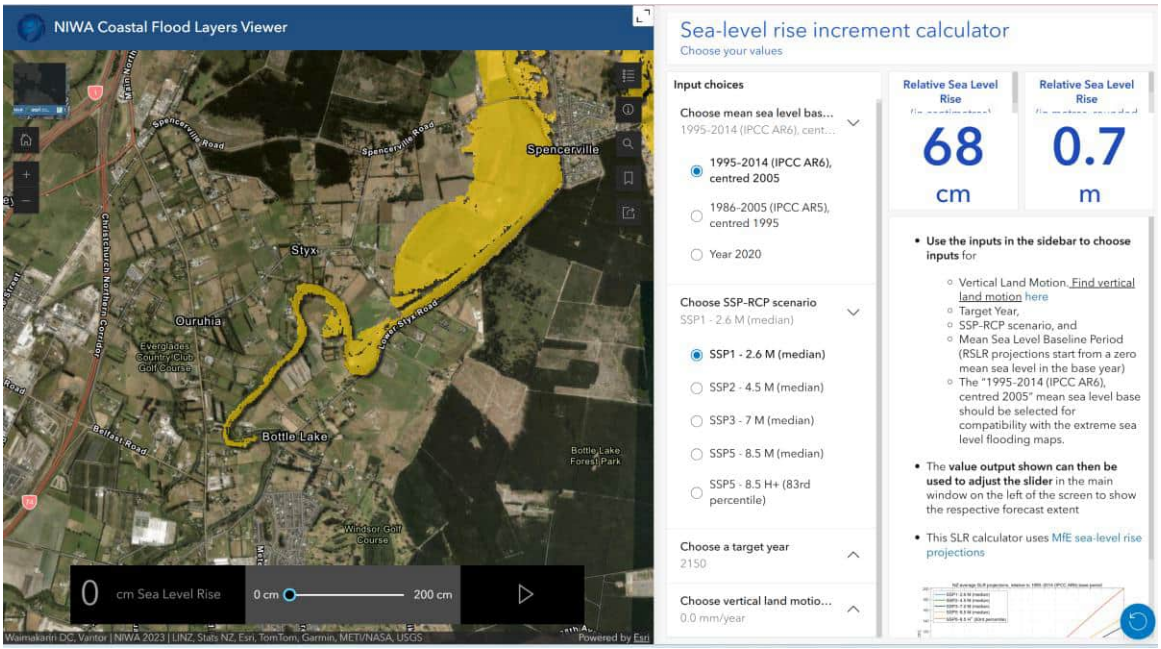


**Figure 2:** Sea level rise scenario SSP1-2.6M in vicinity of rezoning. Yellow indicates inundation up to 0.7 metres (source: NIWA Coastal Flood Layer Dataset https://experience.arcgis.com/experience/8e3d7262cc9846968f0bfb86da0806f8 )

The rezoning of this land which will result in significant increase in development on it will require extensive earthworks and filling and creation of attenuation areas[2]. The effects of modifying the environment to mitigate the potential flood risk in conjunction with additional stormwater generated by the proposed development, has not been adequately addressed or modelled in the application documents. These effects will include diversion of flood waters onto neighbouring properties and downstream properties; effects on groundwater increases or decreases; effects on adjacent bores; effects on biodiversity; risk to human life and structures; and adverse effects on existing roads and other infrastructure.

The use of this land was not anticipated by Council's Growth Strategy (see Figure 1 below) and the Greater Christchurch Spatial Plan. The proposed rezoning is not required to meet growth targets set out in the National Policy Statement on Urban Development (NPS-UD) as Christchurch City Council has confirmed its housing plan provides for future growth, with modelling showing plan enabled feasible housing capacity for at least 68,200 homes, exceeding the 65,640 homes needed to meet the statutory requirement for 30 years of adjusted demand. This area of land that is the subject of this private plan change has not been identified for future growth in Council's Growth Strategy.

[2] Response to RFI by applicant source: https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2025/PC23/PC23-1st-RFI-Response-Stormwater-29.07.2025.PDF

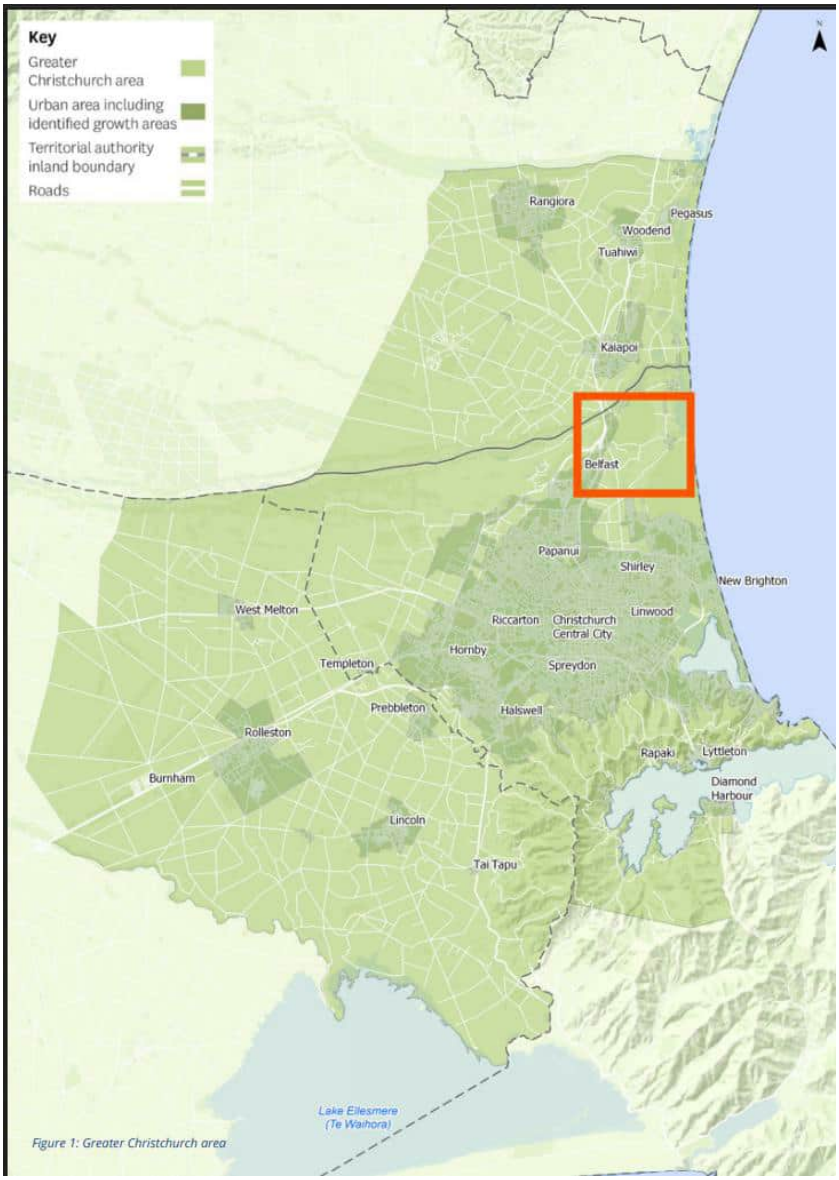


**Figure 3:** *Our Space 2018 – 2048*: Christchurch City Council Growth Strategy. Area highlighted by orange outline is location of proposed plan change (Source: https://www.greaterchristchurch.org.nz/assets/Documents/Resources/Projects/Urban-Development-Strategy/Our-Space-2018-2048.pdf)

There is insufficient infrastructure, including potable water, reticulated sewage, stormwater, roading, cycleways and walkway facilities to ensure all potential adverse effects on the environment can be avoided, remedied or mitigated. The site is located within a Qualifying Matter area identified as a Wastewater Constraint Area. According to the document set and the legal opinion around the Qualifying Matter it was noted that, *"some intensification is considered potentially feasible in greenfield RNN areas, for the most part, the Three Waters infrastructure was constructed to service these areas, which were sized according to the zoning as per the District Plan. It was concluded that upgrading the infrastructure would not be cost-effective or economically feasible*[3]*."* Even without medium density development being provided for, the servicing required for the proposed level of development proposed does not adequately address this

[3] Application documents – Appendix N, para 13 (sourced: https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2025/PC23/Notification/NOTIFICATION-PC-23-APPENDIX-N-Application-of-MDRS-RFI-29.07.2025.PDF )

constraint. The proposal is inconsistent with the relevant objectives and policies of the NPS-UD and the relevant District Plan objectives and policies.

There has also been insufficient modelling of effects on levels of service for the increased traffic on roads in the short, medium and long term.

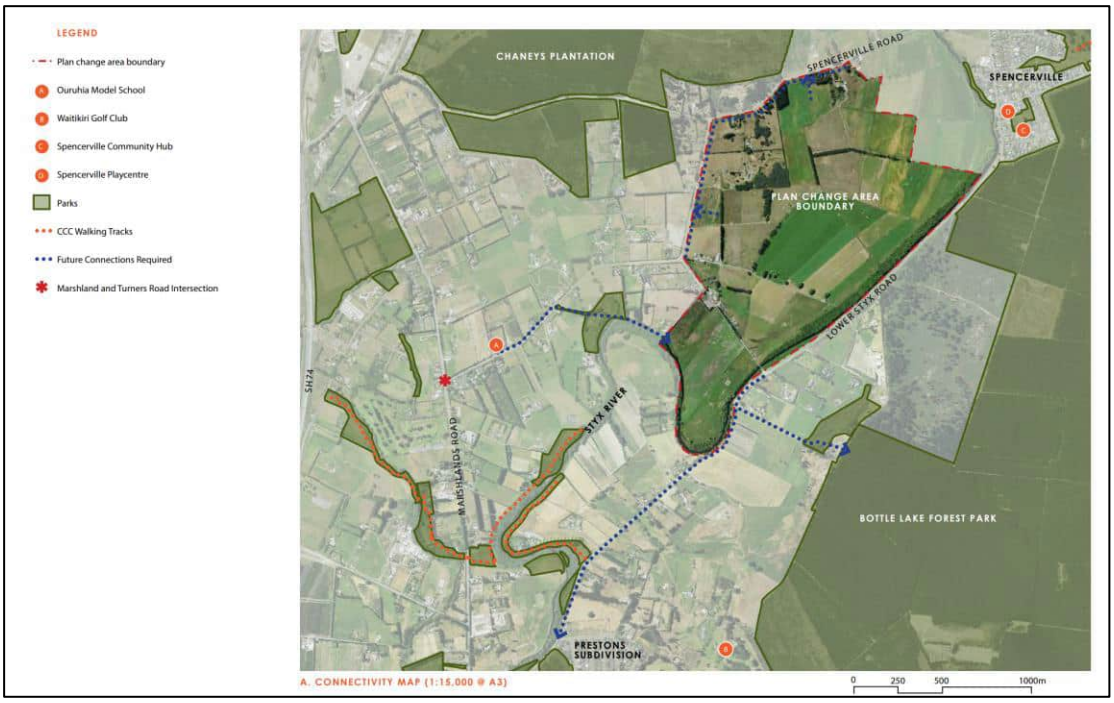


**Figure 4:** Connectivity Map prepared by applicant showing development in relation to the local roading network (source: Application documents prepared by DCM Urban. https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2025/PC23/PC23-2nd-RFI-Response-Appendix-2-Graphic-Attachment-28.8.25.PDF

A small area of the Rural Urban Fringe Zone properties are partially located within Land Use Capability Soil II. Under the NPS-HPL, the rezoning of Class II soils must be avoided. There is no exception to this provision. This land is not exempt under the NPS-HPL and therefore the rezoning of this land should be avoided.

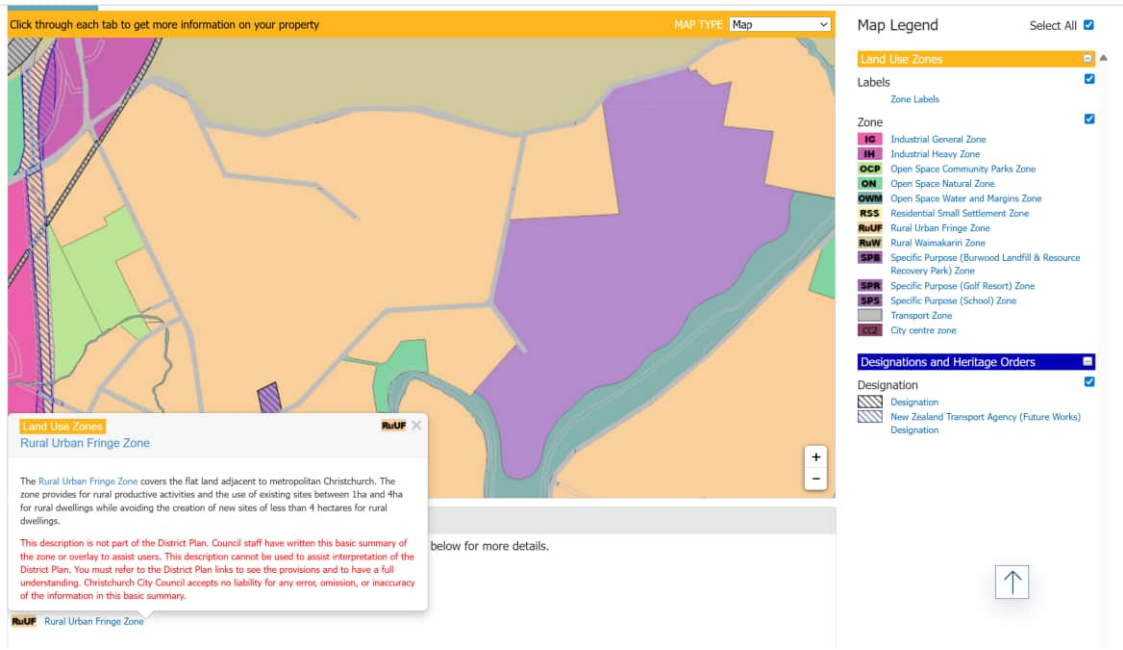


**Figure 5:** Zoning of Subject Land showing Area in orange as Rural Urban Fringe Zone being for rural productive activities (source: CCC EPl

In addition to loss of highly productive land, future and open space areas, the proposed use of the land will have adverse effects on rural amenity and character values that will be irreversible. The new residential and commercial developments are within a wider sensitive environmental landscape on which potential adverse effects will not be able to be appropriately mitigated. The Landscape and Visual Assessment are incomplete and insufficient and do not adequately address these effects. The application does not adequately identify potential natural wetlands within the site and how those will be protected.

In the event that the application is not declined, this submission sets out generally, the parts of the Proposed PC23 that we seek **Amend**, together with reasons for the suggested amendments.

## 3. SUBMISSION AND CHANGES SOUGHT

We **oppose** Proposed PC23 for the reasons set out above:

1. The proposed rezoning does not represent a well-functioning urban environment
2. The increased provision of housing is not necessary to meet the demand over the next 30 years
3. There is insufficient infrastructure to service the proposed development including waste water and potable water services
4. There is a failure to provide appropriate roading, cycleway and walkway connections
5. There will be a loss of highly productive land, natural wetlands and other open space land
6. There will be adverse impacts on the environment, including on natural and landscape values that have not been appropriately mitigated

Should the application be approved, we **seek** the following general amendments to PC23 to better achieve the Purpose of the RMA. We reserve the right to request further amendments through the hearing process to address the concerns that we have raised in our submission.

**A. Reject the changes to the Specific Purpose Zone to remove references to Whisper Creek**

**Reasons:** We are seeking that the land use for this area does not change.

HOWEVER, should the Hearing Commissioners consider recommending approval, we request the following amendments be made:

**B. Require amendments to the Plan Change to include compliance with a Development Plan for the area in Chapter 8 of the District Plan including and as follows:**

a. Finalise an **Approved Outline Development Plan** for the entire area to be rezoned including Open Space Zone; Rural Urban Fringe Zone and New Neighbourhood zone that gives effect to updated flood models showing extent of 0.5% AEP event and any natural wetlands

b. Provide for subdivision within the **Approved Outline Development Plan as a Restricted Discretionary Activity** under Rule RD.2 under Chapter 8.5.1 of the District Plan

c. Provide for **Matters of Discretion** for any subdivision of land within the **Approved Outline Development Plan** to include, but not limited to, the following:

   i. Compliance with the approved Outline Development Plan
   ii. Earthworks Depth Range Plans and Cut & Fill Quantities
   iii. Servicing Plans
   iv. Flood modelling of post development inundation and stormwater to 0.5% AEP event
   v. Groundwater monitoring to assess stormwater effects
   vi. Identification and protection of all natural wetlands
   vii. Provision of reticulated wastewater, potable water, water for fire-fighting purposes and stormwater services

viii. Ownership arrangements of all infrastructure including on-going maintenance requirements

ix. Road safety audits for all new intersections

x. Transportation assessments

xi. Geotechnical engineering in relation to management of natural hazards including liquefaction

d. Add to Appendix 8.4.1.2 in the District Plan a **new Outline Development Plan** for the area as provided in the applicant's documents showing areas of development including but not limited to existing and new roading networks; stormwater areas, areas to be protected for natural values and open space values

e. Provide as **a non-complying activity**, any subdivision that is not consistent with the approved Outline Development Plan. Add to Activity Status Table in 8.5.1.5 of the District, subdivision in the Outline Development Plan that does not comply with the RDA Rule RD.2.

**Reasons:** The land must be suitable for the level of development proposed. The proposed plan change 23 does not provide sufficient information to determine the level of effects and whether those effects have been adequately avoided, remedied of mitigated. The activity status and matters of discretion should ensure that these matters are addressed before any subdivision of the land is approved. As proposed, any subdivision of land within the Outline Development Plan would be a controlled activity which Council must grant consent to. Given the lack of information submitted with the application, this is not considered an appropriate activity status.

**C. Amendments to Rules as shown via Track Changes on the attached document (see following page):**

**Reasons:** The land must be suitable for the level of development proposed. The proposed plan change 23 does not provide sufficient information to determine the level of effects and whether those effects have been adequately avoided, remedied of mitigated. The activity status and matters of discretion should ensure that these matters are addressed before any subdivision of the land is approved.

**D. Any of changes deemed necessary as a result of amendments to the proposal or to give effect to a better urban form outcomes.**

**Reasons:** The land must be suitable for the level of development proposed. The proposed plan change 23 does not provide sufficient information to determine the level of effects and whether those effects have been adequately avoided, remedied of mitigated. This submission reserves the right to comment on additional matters that may be brought up at the hearing and to address matters relating to better urban form outcomes.

PROPOSED CHANGES TO RULE FRAMEWORK AS PROPOSED BY THE APPLICANT WITH CHANGES PROPOSED BY THE SUBMITTOR

From Submittor: Refer to track changes included as part of this submission plan change 23 in accordance with Submission Point C above. Underlined shows proposed new amendments; and ~~strikeout~~ shows proposed deletions to text.

# Whisper Creek Plan Change – Key Amendments

This table is provided as a summary means of comparing the key changes between the operative Specific Purpose (Golf Resort) Zone and the Residential New Neighbourhood Zone. It focusses on the key changes, rather than seeking to compare every activity and built form rule.

A comparison with the Rural Urban Fringe Zone is not provided as the RUF and RNN zones seek fundamentally different outcomes and therefore there is little value in providing a comparison as the rule frameworks and anticipated outcomes are fundamentally different.

| Key Outcomes | |
|---|---|
| **Existing SP (Golf Resort) Zone** | **Proposed RNN Zone** |
| One of two Specific Purpose (Golf Resort) Zones, with Clearwater being the other location with this zoning. | Adoption of the well-established and tested Residential New Neighbourhood Zone (RNN) framework to replace the SP Golf and RUF Zone. Subject to the relevant changes that enable an appropriate assessment against the Approved Outline Development Plan |
| Four lifestyle blocks in the northwest corner have a Rural Urban Fringe Zone (RUF) and are not covered by the current ODP. | Include the four RUF lifestyle blocks in the plan change to RNN. Except where those lifestyle blocks are located within Class II soils and in which case the RUF zoning should remain. |
| The Styx River edge of the site has an Open Space Water & Margins Zone (OSWM). | Retain the OSWM Zone adjacent to the Styx River. |
| Development guided by an Outline Development Plan (ODP), with various 'activity areas' shown, These areas include a high density resort (hotel, hospitality, and student hostel), a residential area, and a golf course/ open space area. | Retain an ODP for the entire site. Simplify the ODP by removing the various different types of development area as all of the development area will be for housing. |
| Development area focussed on the upper terrace, with much of the open space area located within a Flood Management Area. | Retain focus of the development area on the upper terrace, with open space and recreation on the lower terrace. |
| The ODP shows walking trails are shown along the river margins. | Retain walking trails along the river margins. |
| Road access is from Spencerville road, and over a bridge to Lower Styx Road, with a service entrance from Teapes Road. | Road access is from Spencerville Road, Turners Road, and Teapes Road. No vehicle access is proposed to Lower Styx Road |
| No pedestrian or cycle links proposed to connect the site to eh wider neighbourhood or nearby recreation opportunities. | Extended pedestrian and cycle links to Ouruhia Model School, Bottle Lake Forest, and Prestons suburb are proposed. Include in relevant objectives and policies and show on the Outline Plan of Development. |
| Internal ODP road network is not designed to accommodate public transport. | Internal ODP network includes a collector road loop to provide opportunity for public transport. Include in relevant objectives and policies and show on the Outline Plan of Development. |

| | |
|---|---|
| Landscape buffer and 20m building setback from rural zone internal boundaries | Inclusion of the adjacent RUF lifestyle blocks in the plan change means internal setback rules and planting is not necessary. Stormwater |

| | |
|---|---|
| Submission by Kristin and Andrew Buxton<br>15 November 2025 | basins are shown on the ODP between the development area and the rural farm to the northeast of the site. |

| | |
|---|---|
| Provides for:<br><br>• 150 residential units<br>• 160 bed student dormitory<br>• 380 resort bedrooms<br>• Rural activities and ecological restoration<br>• Outdoor recreation activities<br>• Clubhouse, restaurants, gym, indoor sports complex<br>• Food and beverage outlets (1,000m$^2$)<br>• Retail (500m$^2$)<br>• Golf academy and education spaces | Provides for:<br><br>• 800 residential units estimate at 15 hh/ha<br>• Rural activities and ecological restoration<br>• Outdoor recreation activities in reserves<br>• Neighbourhood centre (size subject to RC under RNN rules)<br>• Ecological restoration<br>• Protection of all natural wetlands<br>• Protection of ground water and surface water through on-site treatment of stormwater for all roads and right of ways<br>• Provide for hydraulic neutrality of stormwater<br>• Provide for low-impact water sensitive urban design |
| **Rule Framework** | |
| **Specific Purpose (Golf Resort) Zone** | **Residential New Neighbourhood Zone** |
| **Permitted** | |
| P1 – All rural activities permitted in the RUF zone | P21 - All rural activities permitted in the RUF zone |
| P2 recreation | P23 – Reserves, and recreation is permitted in the RUF Zone (P10) so covered by P21 above |
| P3 wetland restoration | Permitted in the RUF Zone (P9) so covered by P21 above |
| P4 -P6 clubhouse, F&B and retail – 1,000m$^2$ GFA F&B, 500m$^2$ GLFA retail | P8-P16 – range of community facilities and activities, some of which are subject to scale limits |
| P7-P9 Golf academy and apartments – 160 academy bedrooms, 380 resort bedrooms of which no more than 170 prior to the golf course being constructed | P24 and P26 – small-scale hosted and unhosted visitor accommodation (Air B&B type activity) |
| P10 Residential – 150 units with boundary planting to be in place first | P1-P4 residential activity. Number of units subject to RNN built form and subdivision rules<br>Add to policy – consistent with the approved Outline Development Plan |
| P11-12 – driving range subject to noise and lighting controls | N/A |
| **Controlled activities** | |
| No controlled activities | C1 – retirement villages |
| | C2 – comprehensive residential development |

| | |
|---|---|
| | Activity subject to the same range of Matters of Discretion applicable to the subdivision (see Submission Request B above) |
| RD1-4 – anything that is RD in the rural zone, plus any built form rule breach | RD23 – anything that is RD in the rural zone, plus any built form rule breach |
| RD5 – construction of golf course and planting subject to a management plan | N/A. Development of any reserves prior to vesting with Council is a matter of discretion determined through the subdivision process. |
| RD6 – subdivision of academy areas A-A2 subject to a concept plan | Subject to Subdivision rules applicable to the RNN Zone |
| **Discretionary** | |
| D1 – any activity located outside of the area for that activity shown on the ODP | See RD2 above |
| See NC1 below | D1 – Any activity not otherwise listed |
| See NC5 below | D2-D8 – oversized community activities and visitor accommodation |
| **Non-complying** | |
| NC1 – Any activity not otherwise listed | ~~See D1 above~~Any activity within the approved Outline Development Plan that does not comply with RD1 above. |
| NC2 – Any road access that is not a single road from Lower Styx and Spencerville Road or a service road form Teapes Road | Subject to subdivision rules regarding the design and location of new access points.<br><br>Subject to the need to be in accordance with the ODP regarding a single access to Spencerville Road, Turners Road, and Teapes Road. No vehicle access is proposed to Lower Styx Road |
| NC3 -No occupancy until Styx/ marshlands intersection is signalised | N/A – this intersection is now signalised, and vehicle access is no longer proposed to Lower Styx Road |
| NC5 – Activity limits:<br>- F&B and retail over GFA limit<br>- 160+ dormitory bedrooms<br>- 380+resort bedrooms of which no more than 170 can be built before the golf course<br>- 150+ resi units, with none to be built before boundary planting<br>- Driving range noise and light control breaches | No limit on residential numbers (subject to RNN built form standards)<br><br>Limits on the scale of non-residential activities subject to D1-D8 |
| **Prohibited activities** | |
| No prohibited activities | No prohibited activities |

[1] See also the comprehensive suite of subdivision matters of discretion 8.8.8 and 8.8.9 regarding alignment of ODP outcomes and RNN greenfield development

| | |
|---|---|
| **Built form standards** | |
| | |
| Road setback - 100m building setback from Turners Rd, Spencerville Rd, and Teapes Rd | Road setback - 10m setback proposed in the ODP narrative for these three roads. 4m setback form internal roads (14.12.2.11a);<br><br>Road landscaping – 5m deep proposed in the ODP narrative for these three roads. 2m strip for internal roads (14.12.2.7a) |
| Internal boundary setback - 20m from rural zone boundary | Internal boundary setbacks -1m (14.12.2.5ai) |
| Height - 8m permitted; 8-12m = D; 12m+ = NC | Height – 8m; 11m for comprehensive development; RD if higher |

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Penelope Ann **Last name:** Hargreaves

**Prefered method of contact**

**Postal address:** 119 Lower Styx Road, Bottle Lake, Christchurch, New Zealand, 8083

**Email:** na@na.com

**Daytime Phone:** 0274114874

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**
I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
see attached

**Reason for Decision Requested:**

## Specific Provisions

see attached

## Reasons

see attached

Christchurch City Council

# Submission on a Publicly Notified Plan Change to the Christchurch District Plan

Resource Management Act 1991 – Form 13

**Email to:** PlanChange@ccc.govt.nz ; or
**Deliver to:** Ground floor reception, Christchurch City Council, 53 Hereford Street, Christchurch Attn: City Planning Team; or
**Send to:** City Planning Team, Christchurch City Council, PO Box 73012, Christchurch, 8154
**For enquiries phone: (03) 941 8999**

RECEIVED 17 NOV 2025 BY:

## 1. I wish to make a submission on:

Plan change name & number:

## 2. Submitter details

Full name of submitter: PENELOPE A.M HARGREAVES
Street address: 119 LOWER STYX RD, BOTTLELAKE.
Postal Address (if different):
Contact phone number (daytime): 0274 114 874 Postcode: 8083
Email:

My address for service for receiving documents and communication about this application is: ☐ By email ☑ By post

## 3. Submission details

I / We: ☐ Support all or part of the application
☑ Oppose all or part of the application
☐ Am neutral towards the application

The specific provisions of the plan change that my / our submission relates to are: *(give details, using additional pages if required)*

The Whisper Creek (Golf Resort) provided improvements to the Styx River which would have alleviated flood risk above and below the subdivision

The reasons for my / our submission are: *(use additional pages if required)*

The application should be refused as the infrastructure providing adequate roading, sewerage and stormwater containment is not adequate to provide for 800 new homes. The development will unnecessarily increase flood risk to both the upper and lower Styx River.

The decision I / we would like the Council to make is: *(give details including, if relevant, the parts of the application you wish to have amended and the general nature of any conditions sought. Use additional pages if required)*

My evidence will show the application will cause increased flooding in the upper and lower Styx River which has the potential to cause extensive damage to property, businesses and loss of life

## 4. Trade competition

I / We: ☑ **Are not** a trade competitor of the applicant OR

☐ **Are** a trade competitor of the applicant, and are directly affected by an effect of the proposal on the environment which does not relate to trade competition or the effects of trade competition.

## 5. Hearing of this application

If a hearing is held, I / we:

☑ **Wish to** speak in support of my / our submission

☐ **Do not wish to** speak in support of my / our submission

☐ If others make a similar submission I / we will consider presenting a joint case with them at the hearing

☐ Request that the Council delegates its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the Council, under section 100A of the Resource Management Act.

*Please note that a hearing will only be held if the applicant and/or any submitters wish to be heard, but all submissions will be taken into consideration regardless.*

*If you change your mind about whether you wish to speak at the hearing, please contact the Council by telephone on 941 8999 or by email at PlanChange@ccc.govt.nz.*

## 6. Signature (of submitter(s) or person authorised to sign on behalf of submitter(s)

Signature: P. Henryson, Date: 17th November 20

Signature: [illegible] Date: 17 November 2025

*Note: A signature is not required if you make your submission electronically*

**Important information**

1. The Council must receive your submission before the closing date and time for submissions on this application.
2. If you are a trade competitor, your right to make a submission may be limited by the provisions in Part 11A of the RMA.
3. The Council may strike out a submission (or part of it) in the following situations:
   - It is frivolous or vexatious
   - It discloses no reasonable or relevant case
   - It would be an abuse of the hearing process to allow it to be taken further
   - It contains offensive language
   - It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matters.

**Privacy information**

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker) and the applicant.

Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

**Office use only**

Received at the ..... Office on ..... at ..... am / pm

- The application goes against the current zoning rules -the District Plan provides for subdivision Specific Purpose (Golf Resort) at Whisper Creek. This proposal does not include a golf course
- The Whisper Creek (Golf Resort) - was granted based on the golf course providing substantial public recreation and further public access and flood mitigation areas
- It is understood that new intensification legislation will allow 15 house to the hectare on this land
- The land is a flood ponding and management area under the District Plan. This could cause serious issues for the area given the land changes due to the earthquakes
- The typography of the land means current use (as farmland) should continue
- There are potentially significant effects on the Styx river catchment in terms of amenity and flooding
- Styx River catchment currently under huge pressure to carry the volume of water since the earthquakes this development will further impact this situation
- Potential traffic effects:
  - Need for traffic lights at Chaney's corner
  - Need for controlled intersection (give way) on Turners Road corner
  - Both Spencerville Road and Turners Road would need substantial realignment and widening
  - There is no access planned for a new bridge over the Styx river to Lower Styx Road
- ~~There must be access to Lower Styx Road as 6,500 traffic movements per day will cause huge congestion if limited to only Turners and Spencerville Road~~ Lower Styx Rd is v Busy
- The limited carrying capacity of the bridge for the water and sewage pipes on Spencerville Road
- Two lane bridge would need to be built on Spencerville Road
- There would be a change to the rural amenity
- Significant cost of maintaining the reserve area for rate payers

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Tamara Tracy Watson **Last name:** Wells

**Prefered method of contact**

**Postal address:** 103 Turners Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** wells103@xtra.co.nz

**Daytime Phone:** 021593222

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
see attached

**Reason for Decision Requested:**

## Specific Provisions

see attached

## Reasons

see attached

Christchurch City Council

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**Send to:** City Planning Team, Christchurch City Council, PO Box 73012, Christchurch, 8154

**For enquiries phone: (03) 941 8999**

## 1. I wish to make a submission on:

Plan change name & number: Private Plan Change 23 – 'Whisper Creek Residential.'

## 2. Submitter details

Full name of submitter: Tamara Tracy Watson Wells

Street address: 103 Turners Road, Ouruhia, Christchurch 8083

Postal Address (if different):

Contact phone number (daytime): 021 – 593 – 222 Postcode: 8083

Email: wells103@xtra.co.nz

My address for service for receiving documents and communication about this application is: ☑ By email ☐ By post

## 3. Submission details

I / We:
- ☐ Support all or part of the application
- ☑ Oppose all or part of the application
- ☐ Am neutral towards the application

The specific provisions of the plan change that my / our submission relates to are: *(give details, using additional pages if required)*

See attached

The reasons for my / our submission are: *(use additional pages if required)*

See attached

The decision I / we would like the Council to make is: *(give details including, if relevant, the parts of the application you wish to have amended and the general nature of any conditions sought. Use additional pages if required)*

See attached.

## 4. Trade competition

I / We: ☑ **Are not** a trade competitor of the applicant OR

☐ **Are** a trade competitor of the applicant, and are directly affected by an effect of the proposal on the environment which does not relate to trade competition or the effects of trade competition.

## 5. Hearing of this application

If a hearing is held, I / we:

☑ **Wish to** speak in support of my / our submission

☐ **Do not wish to** speak in support of my / our submission

☑ If others make a similar submission I / we will consider presenting a joint case with them at the hearing

☑ Request that the Council delegates its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the Council, under section 100A of the Resource Management Act.

*Please note that a hearing will only be held if the applicant and/or any submitters wish to be heard, but all submissions will be taken into consideration regardless.*

*If you change your mind about whether you wish to speak at the hearing, please contact the Council by telephone on 941 8999 or by email at PlanChange@ccc.govt.nz.*

## 6. Signature (of submitter(s) or person authorised to sign on behalf of submitter(s)

Signature: J J W Wells. Date: 1 Nov, 2025.

Signature: Date:

*Note: A signature is not required if you make your submission electronically*

### Important information

1. The Council must receive your submission before the closing date and time for submissions on this application.
2. If you are a trade competitor, your right to make a submission may be limited by the provisions in Part 11A of the RMA.
3. The Council may strike out a submission (or part of it) in the following situations:
   - It is frivolous or vexatious
   - It discloses no reasonable or relevant case
   - It would be an abuse of the hearing process to allow it to be taken further
   - It contains offensive language
   - It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matters.

### Privacy information

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker) and the applicant.

Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

**Office use only**

Received at the ..... Office on ..... at ..... am / pm

The specific provisions of the plan change that my submission relates to are-

1. The proposed housing intensification
2. Increase in traffic in the area.
3. Light and Sound from the proposed subdivision
4. Heritage and Culture of this rural area.

The reasons for my/our submission are-

"Proposed Housing Intensification"-

My husband Michael and I have lived on Turners Road for nearly 41 years -it's been a quiet, green, rural area, historically with Dairy Farms, tractors, hay rakes with the odd stock truck…an absolute joy to live in…where you knew and waved to your neighbours. I value my space and the rural aspect. The assault on the landscape to introduce 800 homes, mostly on very small sections, will have an enormous impact on everything.

Since Canterbury's earthquakes, we've become part of the Tsunami zone. (Turners Road even appeared on GeoNet after a particularly noticeable shake). Why would the Council knowingly allow 800 homes to be built IN the Tsunami zone? Not something we knew historically, but perhaps entirely inappropriate to knowingly grant permission, now. How do 1600 plus vehicles evacuate the area quickly, if required? It feels like 'Pacific Park', where tragically permission was granted to build beside the Estuary. We've evacuated already, after the Kaikoura Quake. And with our Climate warming, much of this area will be affected by our rising sea levels. Aren't we all being encouraged to take this into consideration?

Housing intensification means huge increases in Noise, Light pollution, traffic; let alone the logistics of water, wastewater, stormwater, run off, and the ecology of the area, etc.

"Increase in traffic"-

I walk most days on Turners Road and enjoy the quiet and observing the wildlife. The increase of traffic per day will devastate our little rural road, particularly in the building faze of the proposed subdivision. My safety, the safety of my neighbours and their children, be it walking, cycling, horse riding or driving, and the enjoyment of our rural area, is of paramount importance to me and a major concern.

Turners Road was quite badly damaged in parts, with liquefaction, during the earthquakes and a section of road, alongside our property has been resealed again, recently. There are currently very large trucks, that travel daily over this

segment of road, which in turn 'bang and crash' as they negotiate the fix job. This regularly shakes our very 'well built' home and is loud and jarring, particularly when the trucks are empty. One of the developers of the proposed subdivision has these trucks at his rural property on Turners Road and I believe these are unconsented for in our rural area, as well.

I do not believe our little rural road has the capacity to survive the building of, let alone the constant use of traffic, should a subdivision go ahead. It would be dangerous so it's imperative to channel all associated traffic across the stxy river bridge onto Lower styx Road, which has been upgraded for the Prestons subdivision.

"Light and Sound"

I treasure our 'dark sky' here in Ouruhia and the ability to see the moon and stars so clearly. When flying home to Christchurch at night, Turners Road is the dark spot north of Bottle Lake Forest and Prestons and Prestons Park subdivisions…a little oasis of darkness.

The proposed subdivision would increase the light pollution due to the extensive amount of homes and the associated vehicles and street lighting.

And the 'sound' of such intensification is also of huge concern…vehicle noises, parties, functions, shift worker movements etc etc.

"Heritage and Culture"

I was bought up on Lower styx Road, on a farm that also borders the styx River, alongside the proposed subdivision. At the back of the property were Maori Middens- historic ovens and their ancient shells. My Mother had the sandhill cleared of scrub one day, when I was young and I found a range of old 'Adzes' on the site- the Canterbury Musuem displayed a Pounamu Adze, from our property. Any proposed subdivision should be respectfully examined first, by those most appropriate, Ngai Tahu.

My neighbours and I , with the styx river alongside, appreciates and respects the wildlife of the area...our birdlife, fish and eels, our cattle and horses and sheep. It's a sacred place and with the increase in subbdivisions in the area, wildlife continues to be squeezed out of its habitat. I want to look after this for future generations.

The decision I/we would like the Council to make is-

1. I would like the Council to decline the proposed subdivision application.

2. If the council intends to permit this subdivision, regardless of our concerns, that it then adopts the principles of the original 'Whisper Creek' submission and limits its houses to 165 (or fewer), with all traffic and associated vehicles using the upgraded bridge onto Lower styx Road. And that all the green space and the more extensive setbacks from the road and the boundaries, be adhered to, too.
3. I would like the council to be respectful of the neighbourhood by only permitting low level lighting.
4. That the Council make sure all appropriate steps are taken to ascertain any cultural or heritage significance of the site, prior to any work being undertaken.
5. That the Council are assured the appropriate infrastructure is in place to make this a functioning/workable Subdivision…ie Water, waste water, storm water, etc etc, including in times of floods. And that all due diligence is undertaken by the appropriate authorities to make sure of this.

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** Michael Charles **Last name:** Wells

**Prefered method of contact**

**Postal address:** 103 turners road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** wellsmc61@yahoo.com

**Daytime Phone:** 0272013687

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**
I am not **b. does not relate to the trade competition or the effects of trade competitions.**

**Note to person making submission:**

**If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991**

**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
see attached

**Reason for Decision Requested:**

## Specific Provisions

see attached

## Reasons

see attached

Christchurch City Council

# Submission on a Publicly Notified Plan Change to the Christchurch District Plan

Resource Management Act 1991 – Form 13

**Email to:** PlanChange@ccc.govt.nz ; or
**Deliver to:** Ground floor reception, Christchurch City Council, 53 Hereford Street, Christchurch Attn: City Planning Team; or
**Send to:** City Planning Team, Christchurch City Council, PO Box 73012, Christchurch, 8154
**For enquiries phone: (03) 941 8999**

## 1. I wish to make a submission on:

Plan change name & number: PRIVATE PLAN CHANGE 23 - 'Whisper Creek Residential

## 2. Submitter details

Full name of submitter: MICHAEL CHARLES WELLS
Street address: 103 TURNERS RD DURUTHIA CHCH 8083
Postal Address (if different):
Contact phone number (daytime): 027 201 3687 Postcode: 8083
Email: wellsmc61@yahoo.com

My address for service for receiving documents and communication about this application is: ☑ By email ☐ By post

## 3. Submission details

I / We:
- ☐ Support all or part of the application
- ☑ Oppose all or part of the application
- ☐ Am neutral towards the application

The specific provisions of the plan change that my / our submission relates to are: *(give details, using additional pages if required)*

TRAFFIC / Enviroment / Urbanistion

The reasons for my / our submission are: *(use additional pages if required)*

TRAFFIC – Roads not upto large development - and traffic movements later
No lower style access
ENVIROMENT - Waste water - Tsunamis risk - Liquification
- Stormwater - Water Supply.
Urbanisation - Will be over developed for the Area
- Effect day to day running of the Rural Area.

The decision I / we would like the Council to make is: *(give details including, if relevant, the parts of the application you wish to have amended and the general nature of any conditions sought. Use additional pages if required)*

Turn down large subdivision but allow smaller one as per golf course size housing (165 houses for the site)



P.T.O

- Not opposed to the Development - just the size of it.
- Happy with the Golf course size sites (165 homes on larger sections.
- Will our R3 zoning change if it goes ahead ?? and if so does the whole area become urban ??
- Have lived and farmed in the Area for 64 years.
  Turners Rd has deteriorated in the last couple of years with heavy truck movements bringing large amounts of soil into one of the proposed areas.

## 4. Trade competition

I / We: ☑ **Are not** a trade competitor of the applicant OR

☐ **Are** a trade competitor of the applicant, and are directly affected by an effect of the proposal on the environment which does not relate to trade competition or the effects of trade competition.

## 5. Hearing of this application

If a hearing is held, I / we:

☑ **Wish to** speak in support of my / our submission

☐ **Do not wish to** speak in support of my / our submission

☑ If others make a similar submission I / we will consider presenting a joint case with them at the hearing

☐ Request that the Council delegates its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the Council, under section 100A of the Resource Management Act.

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*If you change your mind about whether you wish to speak at the hearing, please contact the Council by telephone on 941 8999 or by email at PlanChange@ccc.govt.nz.*

## 6. Signature (of submitter(s) or person authorised to sign on behalf of submitter(s)

Signature: MCNelly Date: 12/11/2025

Signature: Date:

*Note: A signature is not required if you make your submission electronically*

### Important information

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   - It is frivolous or vexatious
   - It discloses no reasonable or relevant case
   - It would be an abuse of the hearing process to allow it to be taken further
   - It contains offensive language
   - It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matters.

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If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

**Office use only**

Received at the ..... Office on ..... at ..... am / pm

# PC23 - Whisper Creek Residential

Christchurch City Council

## Submitter Details

**Submission Date:** 26/11/2025

**First name:** John J. **Last name:** Messerly

**Prefered method of contact**

**Postal address:** 123 Turners Road, Ouruhia, Christchurch, New Zealand, 8083

**Email:** messerly.john@gmail.com

**Daytime Phone:** 022 394 9826

**Mobile:**

**Age:**

**Gender:**

**Ethnicity:**

**Community:**

**Resident or Ratepayer** *

**Which Area is your property in?** *

*

I could not **Gain an advantage in trade competition through this submission**

**directly affected by an effect of the subject matter of the submission that:**
**a. adversely affects the environment, and**
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**Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

**Consultation Document Submissions**

**Provision:**

**Oppose**
**Decision Requested:**
see attached

**Reason for Decision Requested:**

## Specific Provisions

see attached

## Reasons

see attached

# Form 5 – Submission on a Publicly Notified Plan Change

Christchurch District Plan – Resource Management Act 1991

## 1. Plan change name & number:

Private Plan Change 23 – Whisper Creek (PC23)

## 2. Submitter Details

| | |
|---|---|
| Full name of submitter: | John J. Messerly |
| Street address: | 123 Turners Road, Ouruhia, Christchurch 8083 |
| Postal Address (if different): | Same as above |
| Contact phone number: | 022 394 9826 |
| Email: | messerly.john@gmail.com |
| Address for service: | By email |

## 3. Submission Details

☒ Oppose all or part of the application

The specific provisions of the plan change that my submission relates to are:

Refer to attached full technical submission.

The reasons for my submission are:

Refer to attached full technical submission.

The decision I would like the Council to make is:

Refer to attached full technical submission.

## 4. Trade Competition

☒ I am not a trade competitor of the applicant.

## 5. Hearing of this application

☒ I wish to speak in support of my submission.

## 6. Signature (not required for electronic submission)

Signed: _____ Date: __14 November 2025_____

## Table of Contents

1. Introduction and Scope ..... 9

2. Executive Summary of Reasons for Opposition ..... 12

2.1 The site is subject to multiple interacting natural hazards that have not been adequately quantified ..... 13

2.2 Emergency evacuation under tsunami or flooding conditions has not been demonstrated to be safe ..... 13

2.3 Critical Water Services infrastructure is already inadequate or operating at reduced performance ..... 14

2.4 Reliance on unresolved regional consents under the Canterbury Land and Water Regional Plan ..... 14

2.5 The proposal fails to demonstrate compliance with MDRS, Qualifying Matters, and Clause 25(4A) ..... 15

2.6 Ecological effects on the Pūharakekenui/Styx River are poorly assessed ..... 15

2.7 The proposal imposes significant financial and infrastructure costs on the Council and ratepayers ..... 15

2.8 The overall planning rationale is weak, outdated, and inconsistent with higher-order instruments ..... 16

2.9 Major contradictions exist in the Urban Form, Centres Hierarchy, Urban Design, Landscape & Economic Evidence ..... 16

2.10 Procedural Deficiencies in the Section 32 Evaluation ..... 17

2.11 Failure to Demonstrate Statutory Consistency at Rezoning Stage ..... 17

2.12 Incomplete Mandatory Spatial and Technical Information ..... 17

2.13 Conclusion of Executive Summary ..... 18

3. Natural Hazards and Climate-Change Risk ..... 18

3.1 Outdated flood modelling and incomplete hazard information ..... 18

3.2 Rising groundwater and sea-level rise (NZSeaRise 2022) 18

3.3 Liquefaction, lateral spread, and long-term settlement risks 19

3.4 Lower Styx Ponding Area and flood-storage displacement 19

3.5 Tsunami evacuation modelling and life-safety obligations 19

3.6 Tidal-closure events and backflow from Styx River mouth 19

3.7 Deferred investigations are inconsistent with national guidance 19

3.8 Conclusion 20

4. Water Network – Adverse Effects 20

4.1 Potable Water Supply: No existing capacity and high long-term risk 21

4.2 Wastewater: Network-wide constraints and reduced pump-station performance 21

4.3 Stormwater: Severe conveyance limitations and incomplete hydrological assessment 22

4.4 Lifelines and network resilience 22

4.5 Long-term infrastructure funding is uncertain or absent 22

4.6 Conclusion: PC23 is not serviceable, not resilient, and not compliant with post-2024 water-infrastructure obligations 23

5. Stormwater, Floodplain Function & Hydraulic Constraints 24

5.1 The Turners Road stormwater system is hydraulically constrained 24

5.2 CCC has identified significant basin sizing errors 24

5.3 Reliance on basins located within flood-hazard areas 24

5.4 Flood-storage displacement from extensive filling has not been quantified 24

5.5 Rising groundwater undermines stormwater function 24

5.6 Tidal closure, storm surge, and backflow have not been modelled 25

5.7 Stormwater quality treatment is insufficient for an ecologically degraded catchment....25

5.8 Conclusion....25

6. Transport, Traffic Safety & Tsunami Evacuation....25

6.1 Existing Road Network Constraints....25

6.2 One-Lane Bridge and Intersection Hazards....26

6.3 Absence of Public Transport and Increased Vehicle Dependence....26

6.4 Underestimated Traffic Generation....26

6.5 Tsunami Evacuation Performance Not Demonstrated....26

6.6 Lack of Redundancy and Lifeline Dependencies....27

6.7 Effects on Spencerville and Ouruhia Communities....27

6.8 Consistency with Planning Instruments....27

6.9 Conclusion....27

7. MDRS, Qualifying Matters, and Clause 25(4A) Requirements....28

7.1 Clause 25(4A) Requirements Have Not Been Met....28

7.2 Incorrect Use of "Open Space" as a Qualifying Matter....28

7.3 Absence of Spatial Hazard Mapping....28

7.4 Failure to Follow s77L Evaluation of Alternatives....29

7.5 Conflict with CRPS and Christchurch District Plan Policies....29

7.6 Deferred Hazard and Infrastructure Analysis is Inconsistent with MDRS Requirements....29

7.7 Inadequacy of the s32 Evaluation....29

7.8 Conclusion....30

8. Ecology, Biodiversity & Te Mana o Te Wai....30

8.1 Declining Ecological Health of the Pūharakekenui/Styx River....30

8.2 Insufficient Riparian Buffers and Habitat Fragmentation....31

8.3 Stormwater Quality Treatment is Inadequate for a Sensitive Catchment....31

8.4 Failure to Apply the Te Mana o Te Wai Hierarchy of Obligations....32

8.5 Seasonal Wetlands and Groundwater-Dependent Ecosystems....32

8.6 Cumulative Effects on the Catchment....32

8.7 Inconsistency with Policy Direction....33

8.8 Conclusion....33

9. Cultural, Archaeological & Heritage Values....33

9.1 Introduction and Context....33

9.2 The 2022 Preliminary Cultural Assessment Does Not Apply to PC23....34

9.3 Effects on Pūharakekenui/Styx River (Ngā Wai)....35

9.4 Effects on Mahinga Kai....35

9.5 Cultural Landscape and Heritage Risks....36

9.6 Te Mana o te Wai Obligations Not Met....36

9.7 Procedural Inadequacy of Engagement....37

9.8 Conclusion: PC23 is Inconsistent with Cultural, Heritage, and Kaitiakitanga Obligations....37

10. Contamination, Public Health & Soil / Groundwater Quality....38

10.1 NES-CS Applicability and Incomplete Site Contamination Assessment....38

10.2 Risks from Imported Fill....38

10.3 Groundwater Quality and Salinity Intrusion....38

10.4 Dust, Construction Contaminants & Public Health....39

10.5 Soil Stability, Groundwater & Contaminant Transport....39

10.6 Public-Health Risks from Private Potable Water Supply....39

10.7 Consistency with Policy Requirements....40

11. Urban Form, Centres Hierarchy, Urban Design, Landscape, and Economic Effects....40

11.1 Policy Context and Strategic Framework....40

11.2 Strategic Urban Form and Consolidation Effects....41

11.2.1 A Peripheral, Non-Contiguous Satellite Settlement....41

11.2.2 Conflict with the CRPS Requirement for Consolidated Urban Form....41

11.2.3 "Walkability" Without Destinations Is Not Urban Integration....42

11.3 Centres Hierarchy and Commercial Viability....43

11.3.1 The Proposed "Hub" Is Not a Centre Under CCC Policy....43

11.3.2 Failure of Agglomeration Thresholds....43

11.3.3 Risk of Undermining Prestons Centre....44

11.3.4 LMM's Economic Assessment Fails the Required Policy Test....44

11.4 Economic and Retail Distribution Effects....45

11.4.1 The Counterfactual Is Invalid....45

11.4.2 Construction Benefits Are Generic and Overstated....45

11.4.3 Externalities Omitted....45

11.4.4 No Consideration of Long-Term Land Use Efficiency....46

11.5 Urban Design Integration and Walkability....46

11.5.1 Misrepresentation of "Integration"....46

11.5.2 Walkability Claims Are Unsupported....46

11.5.3 The Rural–Urban Interface Is Not Credibly Managed....47

11.5.4 CPTED Risks on Styx River and Basin Edges....47

11.6 Landscape, Rural Interface, and Visual Effects....47

11.6.1 Basins and Wetlands Are Hazard Infrastructure, Not "Amenity"....47

11.6.2 Mischaracterisation of Existing Landscape....48

11.6.3 Graphics Reveal Greater Effects Than Reported....48

11.6.4 Cumulative Effects Ignored....48

11.7 Transport Integration and Accessibility....49

11.7.1 Lack of Public Transport and Unlikely Future Provision....49

11.7.2 Car Trip Generation Understated....49

11.7.3 Hazard-Related Access Limitations Ignored....49

11.8 Incoherent Urban Design....49

11.8 Synthesis and Conclusion....51

12. Insurability and Long-Term Financial Exposure....51

12.2 Historical Precedent for Insurance-Driven Property Devaluation....52

12.3 Published Authorities Signalling Insurability Risk in Environments Like PC23...52

12.4 Why PC23 Presents a Perfect Storm of Insurance Risk....52

12.5 Likely Insurance Outcomes for PC23 if Developed....52

12.6 Planning Implications Under the RMA and CRPS....53

13. Additional Substantive Issues Identified for Further Development....53

13.1 School Safety and Local Traffic Effects....53

13.2 Construction-Phase Noise, Vibration, Dust, and Haulage Effects....53

13.3 Transport Emissions and Vehicle-Kilometres Travelled (VKT)....53

13.4 Firefighting Water Supply and Emergency Response Times....54

13.5 Groundwater Interference with Existing Domestic and Stockwater Wells....54

13.6 Spencer Drain Capacity, Maintenance Requirements, and Ecological Sensitivity 54

13.7 Historic Soil Contamination and Mobilisation Risks....54

13.8 Bird-Movement Patterns, Wetland Interfaces, and Low-Flight Operations.....54

13.9 Recreational Carrying Capacity of the Pūharakekenui/Styx Corridor.....54

14. Relief Sought.....54

14.1 Primary Relief Sought – Decline Private Plan Change 23.....55

14.2 Alternative Relief – Defer or Suspend PC23 Pending Essential Information.....55

14.3 Site-Specific Relief – Conservation Zoning for the Lower Terrace.....56

14.4 Relief Regarding MDRS, QMs, and s77L Obligations.....56

14.5 Relief Regarding Cultural and Archaeological Assessment.....56

14.6 Relief Regarding Infrastructure Funding and Long-Term Costs.....57

14.7 Relief Regarding Insurability.....57

14.8 Requirement for a Retail Distribution Effects Assessment.....57

14.9 Remedies Relating to Contamination, Public Health, and Soil/Groundwater Quality.....58

14.10 Relief Regarding Cultural Assessment and Engagement with Te Ngāi Tūāhuriri Rūnanga.....58

14.11 Relief Regarding Procedural and Statutory Deficiencies.....59

14.12 Relief Sought Regarding Further Expert Assessment.....60

14.13 Scope of Relief Sought.....60

14.14 Conclusion- Relief Sought.....61

15. Appendices & Supporting Materials.....61

15.1 Purpose of Appendices.....61

15.2 Recommended Appendix Structure.....61

15.3 Cross-Reference Table (Optional).....64

15.4 Future Evidence and Expert Inputs.....64

15.5 Conclusion- supplemental information placeholder section.....64

## 1. Introduction and Scope

This technical submission is provided in support of and in solidarity with the submission(s) lodged by:

• the Ouruhia Residents Group, and
• the Spencerville community

which sets out substantial and legitimate concerns regarding Private Plan Change 23 (Whisper Creek).

I submit this document on behalf of the Messerly family of Ouruhia and the Lemzin family of Spencerville, both of whom reside within the local road network, hazard environment, and ecological catchment directly affected by the proposed rezoning. Our households, along with many others in Ouruhia and Spencerville, have lived experience of the transport constraints, flooding patterns, groundwater behaviour, and emergency-evacuation realities of this part of northern Christchurch.

This submission is grounded in the obligations of Te Tiriti o Waitangi and in the mana, tikanga, and rangatiratanga of Te Ngāi Tūāhuriri Rūnanga as mana whenua for the Pūharakekenui/Styx catchment and coastal-margin landscapes. All planning decisions for this rohe must give effect to the partnership, protection, and participation principles affirmed through Te Tiriti, as well as the requirements of the Resource Management Act (ss 6(e), 7(a), 8).

The development area sits within landscapes, waterways, mahinga kai sites, and cultural travel routes of long-standing importance to Ngāi Tahu whānui. As such, the Crown (and by delegation, Christchurch City Council) has a responsibility to ensure that mana whenua are fully informed, fully engaged, and afforded the opportunity to assess proposed activities at a level commensurate with their kaitiaki responsibilities.

I endorse the broad concerns raised in the Ouruhia and Spencerville submission(s), however this document serves a different function. It provides a rigorous technical analysis that identifies numerous additional deficiencies in the proposal that are not addressed in those submissions. These include unresolved groundwater-rise and salinity-intrusion risks, unmodelled Styx-catchment flood behaviours, critical shortfalls in the applicant's stormwater and wastewater assessments, unaddressed lifelines vulnerabilities, inconsistencies with the MDRS statutory framework, and omissions in relation to national and regional policy instruments. These points constitute new, independently substantiated

objections that materially alter the risk profile of PC23 and therefore must be considered by the Council on their own merits. This submission draws on:

• CCC's Requests for Further Information (11 June, 29 July, 6 August 2025)
• the applicant's replies, plan and appendixes which contain multiple admissions of design deficiencies
• the Christchurch District Plan
• the Canterbury Regional Policy Statement
• the National Policy Statements (NPS-UD 2020; NPS-FM 2020; NZ Coastal Policy Statement 2010)
• MfE (2022) Coastal Hazards and Climate Change Guidance
• NZSeaRise (2022) projections
• NZGS 2021 geotechnical guidance
• Boffa Miskell (2023) Styx Catchment Ecology Monitoring
• earthquake-engineering literature for coastal-plain environments

Together, these form a comprehensive evidential basis for concluding that PC23 is not safe, not resilient, not lawful under the higher-order planning framework, and not financially or infrastructurally viable.

This submission strengthens the community's concerns by situating them within the relevant hazard, infrastructure, and policy frameworks. This includes demonstrating consistency with national and regional direction, identifying contradictions in the applicant's technical material, and highlighting omissions or assumptions that materially underestimate risk or cost.

This technical assessment responds to gaps in the applicant's engagement with Te Ngāi Tūāhuriri Rūnanga. The applicant relies on a 2022 preliminary cultural letter prepared for an earlier, materially different concept plan—one that did not include 800 dwellings, medium-density clusters, a commercial hub, large-scale earthworks, or the reconfiguration of wetlands and stormwater basins now proposed under PC23. That earlier correspondence does not constitute a Cultural Impact Assessment (CIA), nor can it reasonably be taken as expressing informed mana whenua views on the current rezoning request.

It is therefore necessary and proper that this submission highlight the procedural, cultural, and statutory deficiencies that arise from the absence of updated mana whenua assessment.

On a personal note, I want to make it clear that I am not a planning professional, nor do I wish anyone to assume any such thing. Preparing a submission of this scale has been a significant undertaking. I am a retired research engineer from a well known software corporation who developed advanced information technology now regarded as

commonplace. To help organise, summarise, and make sense of the extensive technical material lodged by the applicant and CCC, I made use of information tools much more advanced than those I worked on during my research career. These functioned much like a highly capable search and drafting tools—I used them to help structure information, cross-check details across documents, and ensure I was interpreting the publicly available material consistently.

All of the facts, citations, and technical points in this submission come directly from the applicant's documents, CCC's RFIs, national policy statements, and other publicly accessible sources. The conclusions and arguments are my own. These tools simply helped me navigate the material and participate more effectively in a process that is ordinarily difficult for laypeople to engage with.

**Scope of Issues Raised**

This submission raises issues relating to, but not limited to:

• transport and emergency-evacuation safety
• natural hazards and climate-change risk (sea-level rise, tsunami, groundwater rise, liquefaction, lateral spread, settlement)
• stormwater design, flood-storage displacement, and three-waters infrastructure resilience
• MDRS compliance, Qualifying Matters, and Clause 25(4A)
• ecology, biodiversity, and cumulative effects on the Pūharakekenui/Styx River
• cultural and archaeological values
• public-health, contamination, and potable-water supply risks
• urban-design and emissions implications
• economic feasibility and risk of stranded development
• s32 defects, including inadequate assessment of alternatives

**Matters of significance to mana whenua are interwoven throughout the issues raised in this submission.**

They arise in relation to:
• cultural heritage and archaeological risks,
• effects on the Pūharakekenui/Styx River as a taonga and a Ngā Wai value,
• mahinga kai and riparian restoration obligations,
• the application of Te Mana o te Wai, and
• the Crown's duty to ensure that urban rezoning decisions do not compromise the ability of Te Ngāi Tūāhuriri to exercise kaitiakitanga.

For this reason, the submission treats cultural effects not as a discrete environmental component, but as a foundational consideration that interacts with hydrology, ecology, landscape change, and long-term hazard exposure.

For the avoidance of doubt, this submission expressly reserves the right to introduce further analysis, evidence, expert reports, diagrams, or technical appendices at later stages (including further submissions and any hearing), provided such evidence falls within the issues mentioned in this submission.

**Purpose of the Technical Submission**

The purpose of this submission is to ensure that CCC's s42A reporting officer and hearing panel have a complete scientific and statutory basis on which to assess PC23; to reinforce community concerns with authoritative supporting references; and to demonstrate that PC23 fails the tests of robustness, precaution, and efficiency required by the RMA, the CRPS, and national direction.

An additional purpose of this submission is to ensure that CCC's assessment of PC23 genuinely reflects its Treaty-based obligations. This includes providing for early, informed, and culturally appropriate engagement with Te Ngāi Tūāhuriri Rūnanga, and ensuring that planning decisions affecting their takiwā are made with a robust evidential understanding of cultural landscape values, mahinga kai practices, and ancestral associations with the Pūharakekenui.

In summary, PC23 exposes residents, infrastructure, ecosystems, and cultural landscapes to unacceptable and unquantified risks; relies on outdated and incomplete modelling; contradicts national, regional, and district planning direction; and fails to substantiate its claims of hazard resilience, infrastructure capacity, transport safety, ecological integrity, or cultural appropriateness.

The proposal does not provide the information necessary for the Council to discharge its obligations under Te Tiriti o Waitangi or to ensure that Te Ngāi Tūāhuriri Rūnanga can exercise informed kaitiakitanga over the Pūharakekenui/Styx catchment.

In the absence of updated, transparent, and mana-whenua-led assessment, and given the unresolved technical, environmental, and procedural deficiencies identified throughout this submission, PC23 cannot proceed.

## 2. Executive Summary of Reasons for Opposition

Private Plan Change 23 (Whisper Creek) seeks to rezone a low-lying, hazard-prone, infrastructure-constrained coastal-plain site for an 800-dwelling residential development. While increasing housing supply is an important public good, such supply must be delivered in a manner that is safe, resilient, affordable over its long-term lifecycle, and aligned with both national policy and the Christchurch District Plan. PC23 does not meet these requirements.

This Executive Summary sets out the principal reasons why the plan change should not proceed.

### 2.1 The site is subject to multiple interacting natural hazards that have not been adequately quantified

The site is located within:
• the Lower Styx Ponding Area,
• a High Flood Hazard Management Area (HFHMA),
• a known tsunami evacuation pathway,
• an area of shallow, rising groundwater influenced by sea-level rise,
• a dune–swale–floodplain assemblage highly susceptible to liquefaction and lateral spread.

Updated flood and groundwater modelling from CCC and the NZSeaRise (2022) programme indicates that effective sea-level rise in northern Christchurch may be 0.3–0.4 m by 2050, exceeding CCC's legacy planning value. The applicant proposes extensive filling to achieve minimum floor levels, but has not demonstrated:
• 1:1 compensatory flood-storage volume,
• the effects of fill on flood behaviour in the Lower Styx, or
• the implications of rising groundwater for liquefaction, settlement, and lateral spread.

Rezoning before this analysis is complete conflicts with the MfE (2022) Coastal Hazards and Climate Change Guidance, the CRPS, and CCC's own hazard overlays.

### 2.2 Emergency evacuation under tsunami or flooding conditions has not been demonstrated to be safe

A subdivision of 800 homes requires the ability to evacuate thousands of residents under extreme time pressure. The road network serving the site:
• lacks capacity,
• includes narrow rural roads not built to collector-road standards,
• includes a one-lane bridge with poor sight lines,
• has substandard intersections (including Chaney's Corner),
• has no public transport services since 2019.

The applicant has not provided NZTA-standard travel-time modelling. Existing congestion observed during summer peaks at Spencer Park illustrates how quickly these roads reach failure conditions.

The CRPS Chapter 6 requires avoiding development that increases risk to life during natural hazards. PC23 does the opposite.

## 2.3 Critical Water Services infrastructure is already inadequate or operating at reduced performance

**Potable water**
CCC has confirmed there is no capacity within the city's reticulated water supply to service PC23. The applicant proposes relying on deep bores and on-site treatment, raising:
• ECan allocation concerns,
• interference risks with neighbouring wells,
• long-term maintenance and resilience risks.

**Wastewater**
The Kainga–Spencerville wastewater network:
• was not designed for an additional 800 homes,
• has pump-station performance reduced from 40 L/s to ~30 L/s post-earthquakes,
• may not achieve assumed performance even with "proactive maintenance,"
• has infiltration rates exceeding model assumptions due to earthquake damage.

**Stormwater**
Stormwater proposals rely on:
• basins located directly within flood-hazard areas,
• hydraulic discharge to Spencer Drain (gradient 1:6000),
• reliance on flood-gates at the Styx River mouth that remain closed during Waimakariri floods or king tides,
• wetlands sized incorrectly (error factor of two identified by CCC engineers),
• future groundwater and salinity conditions not yet modelled.

None of these systems have been demonstrated to meet long-term resilience requirements.

## 2.4 Reliance on unresolved regional consents under the Canterbury Land and Water Regional Plan

The applicant's s32 report states that consistency with the Canterbury Land and Water Regional Plan (LWRP) and Canterbury Air Regional Plan (CARP) can be addressed at subdivision stage and that "clear consenting pathways" exist for the required works. However, under s 75(4)(b) RMA, the Christchurch District Plan cannot be inconsistent with regional plans at the point of rezoning. In the Styx–Lower Waimakariri environment, LWRP (as amended by Plan Change 4) tightly constrains groundwater takes, stormwater and wastewater discharges, and activities affecting wetlands and floodplains.

PC23 provides no quantified assessment of whether the proposed bores, stormwater basins, wetland reconfiguration and earthworks can obtain the necessary LWRP and NES-

Freshwater consents without breaching catchment limits or Te Mana o te Wai obligations. Treating these as post-rezoning matters is procedurally deficient. CCC must assume that some or all regional consents may not be granted. It therefore cannot lawfully rely on speculative future LWRP and NES-FM approvals as the basis for committing this high-hazard site to urban use.

### 2.5 The proposal fails to demonstrate compliance with MDRS, Qualifying Matters, and Clause 25(4A)

Under Clause 25(4A) of Schedule 1, CCC must incorporate the Medium Density Residential Standards (MDRS) unless reduced enablement is justified by spatially defined Qualifying Matters (QMs). The applicant:
• has not supplied any spatial QM mapping,
• misapplies "open space" as a QM, despite proposing RNN zoning,
• relies on self-selected infrastructure constraints that have not been assessed under s77L.

The lower terrace is already subject to hazard overlays inconsistent with residential zoning. Without a proper QM assessment and s77L evaluation of alternatives, PC23 does not satisfy Clause 25(4A) requirements.

### 2.6 Ecological effects on the Pūharakekenui/Styx River are poorly assessed

The Styx River is ecologically degraded, with:
• elevated zinc levels,
• declining EPT invertebrate indices,
• increased fine-sediment accumulation.

Any additional sediment, stormwater discharge, or floodplain modification will worsen these conditions and breach the NPS-FM (2020) requirement to maintain and improve freshwater ecosystem health.

### 2.7 The proposal imposes significant financial and infrastructure costs on the Council and ratepayers

PC23 relies on:
• unbudgeted upgrades to roads,
• two bridges (one to two-lane expansion),
• wastewater network upgrades,
• stormwater pumping and flood-gate upgrades,
• significant maintenance costs for private water-supply and treatment systems.

The developer seeks to privatize early-stage gains while shifting long-term infrastructure liability to the public. This contradicts s32 efficiency tests and CCC's Long-Term Plan commitments.

### 2.8 The overall planning rationale is weak, outdated, and inconsistent with higher-order instruments

The application:
• relies on superseded hazard data,
• relies on geotechnical assumptions contradicted by its own evidence,
• underestimates transport impacts,
• does not meet NPS-UD intensification tests,
• fails to evaluate feasible alternative locations,
• does not recognise Te Mana o te Wai hierarchy obligations,
• does not demonstrate a coherent or deliverable Outline Development Plan.

### 2.9 Major contradictions exist in the Urban Form, Centres Hierarchy, Urban Design, Landscape & Economic Evidence

This submission demonstrates that the applicant's evidence relating to urban form, commercial hierarchy, transport integration, landscape effects, and economic viability is **internally inconsistent**, with each expert discipline relying on assumptions that are directly contradicted by the others.

The result is an **urban design and effects assessment that collapses under its own contradictions**.

Key examples include:

- **Urban Design (Appendix G)** asserts walkability, integration, and an "activated" neighbourhood centre,
  while **Transport (Appendix E)** confirms no public transport, no cycling infrastructure, unsafe footpaths, and car-only accessibility.

- **Economic (Appendix A)** asserts a viable, demand-led commercial node,
  while **both Transport (Appendix E)** and **Urban Design (Appendix G)** confirm that the node has no effective walkable catchment, no passing trade, and will primarily attract car trips.

- **Urban Design claims a softened rural interface**,
  while **Landscape Graphics (Appendix F-i)** clearly show visually exposed medium-

density clusters and large, unmitigated built form elements facing the Styx corridor and rural margins.

- **Economic Appendix A characterises the existing site as "already urban"**, while **Landscape Appendix F** describes an open rural/coastal-fringe landscape with high sensitivity to visual dominance, lighting, and cumulative effects.

These inconsistencies are not minor differences of professional emphasis—they go to the core of whether the applicant's assessment of environmental effects can be relied upon at all.

In planning law and hearings practice:

> **Where expert evidence is internally contradictory, none of it can be given material weight. That is the case here.**

Taken together, the contradictions demonstrate that the proposal **cannot simultaneously be walkable, car-dependent, centre-supportive, rural-edge-respectful, hazard-resilient, and economically viable**.
The evidence simply does not describe a coherent or feasible urban environment.

Accordingly, **Section 11** concludes that the applicant's combined evidence base fails to meet the requirements of the NPS-UD, CRPS Chapter 6, and the Christchurch District Plan, and that **PC23 should not be approved** unless and until the applicant provides a comprehensive, internally consistent, multi-disciplinary reassessment.

### 2.10 Procedural Deficiencies in the Section 32 Evaluation

The Section 32 assessment does not evaluate reasonable alternatives to locating 800 dwellings in this hazard-prone environment, contrary to s32(1)(b)(i). This omission is a significant procedural defect.

### 2.11 Failure to Demonstrate Statutory Consistency at Rezoning Stage

PC23 does not demonstrate consistency with the Canterbury Land and Water Regional Plan as required by s75(4)(b). Reliance on unmodelled, unconsented, and uncertain regional-plan pathways is procedurally inadequate.

### 2.12 Incomplete Mandatory Spatial and Technical Information

The application lacks required spatial mapping of Qualifying Matters, hazard overlays, and infrastructure constraints; provides an ODP not in a form suitable for Chapter 8 insertion; and omits mandatory transport, cultural, and climate-adaptation assessments. These

omissions constitute incomplete information under Clause 23 and prevent lawful notification.

### 2.13 Conclusion of Executive Summary

PC23 is not a responsible or resilient mechanism for delivering additional housing. It exposes future residents, neighbouring communities, and public infrastructure to unacceptable risk and long-term costs. It conflicts with national direction, the CRPS, the Christchurch District Plan, and the precautionary principles embedded in hazard and infrastructure policy.

For these reasons, and for the detailed reasons that follow in subsequent sections, this submission respectfully requests that the Council decline Private Plan Change 23.

## 3. Natural Hazards and Climate-Change Risk

The Whisper Creek site is exposed to a combination of riverine flooding, coastal inundation, tsunami evacuation constraints, liquefaction, lateral spread, high groundwater, and long-term sea-level-rise impacts, all of which interact to produce a multi-hazard environment unsuitable for large-scale residential zoning. PC23 relies on outdated modelling, unverified assumptions, and deferred investigations that do not meet the precautionary obligations of the Resource Management Act, the Christchurch District Plan, or national and regional hazard policy.

### 3.1 Outdated flood modelling and incomplete hazard information

CCC's Senior Stormwater Planning Engineer has confirmed that the Styx flood model underpinning the applicant's assessment is obsolete and does not incorporate:

- modern sea-level-rise projections,
- updated tidal-closure scenarios at the river mouth,
- climate-change-driven storm-rainfall intensification, or
- updated groundwater conditions.

New modelling is expected in late 2025. Until this modelling is available, CCC cannot reliably determine peak flood levels, flood-storage capacity, effects of fill, or safe Finished Floor Levels (FFLs). The applicant proposes to defer hazard quantification until after rezoning, contrary to MfE (2022), CDP 5.3.1, and CRPS 11.3.2(4).

### 3.2 Rising groundwater and sea-level rise (NZSeaRise 2022)

NZSeaRise (2022) shows parts of northern Christchurch are subsiding, producing effective sea-level rise of 0.3–0.4 m by 2050. Higher tailwater levels in the Styx will raise

groundwater beneath the entire site. The applicant has not provided:
• coupled SLR–groundwater modelling,
• future water-table projections,
• salinity-intrusion modelling for stormwater basins,
• geotechnical hazard assessments using future groundwater conditions, or
• long-term settlement analyses.

These omissions breach MfE (2022) requirements for 100-year hazard projections.

### 3.3 Liquefaction, lateral spread, and long-term settlement risks

The site consists of loose sands, overbank deposits, shallow groundwater, and proximity to the Styx River and proposed excavated lakes. NZGS Modules 3 and 4 identify these as high-likelihood liquefaction environments. The applicant's TC2-equivalent claim is methodologically incorrect and inconsistent with MBIE/NZGS guidance, which prohibits pre-assigning TC categories prior to certified ground improvements.

### 3.4 Lower Styx Ponding Area and flood-storage displacement

The lower terrace sits within the Lower Styx Ponding Area. Filling will displace floodwater, reduce storage capacity, and alter flood conveyance. CCC requires 1:1 compensatory storage below RL 3.08 m NZVD before rezoning. Deferring this analysis conflicts with CRPS 11.3.2(4), CRPS 6.6.1, CDP 5.4, and s6(h) RMA.

### 3.5 Tsunami evacuation modelling and life-safety obligations

The site is within a tsunami evacuation corridor served by narrow rural roads, a one-lane bridge, and substandard intersections. No NZTA-standard travel-time modelling has been provided. CRPS 6.3.1 and 6.3.3 require avoiding development patterns that increase hazard exposure.

### 3.6 Tidal-closure events and backflow from Styx River mouth

Flood behaviour in the Styx is affected by tidal cycles, storm surge, and Waimakariri flood-gate closures. These dynamics were not modelled by the applicant. CCC engineers state updated hydrodynamic modelling is needed to assess tidal closure and backflow risks.

### 3.7 Deferred investigations are inconsistent with national guidance

Key investigations—groundwater modelling, salinity intrusion, wetland redesign, liquefaction modelling, flood-storage displacement—are proposed "following rezoning." This sequencing breaches:

- MfE (2022),
- NPS-UD Policies 1 & 5,
- CRPS 11.3.2(4),
- CDP 5.4,
- CDP 5.3.1.

### 3.8 Conclusion

PC23 underestimates hazard severity, relies on outdated modelling, and omits critical investigations. A residential rezoning of 800 homes cannot be approved until updated hydrodynamic modelling, groundwater–SLR modelling, liquefaction analysis, and flood-storage displacement assessments are completed and independently peer-reviewed. The safest and most lawful course is for CCC to decline PC23 or defer decision-making until all hazard information is provided.

## 4. Water Network – Adverse Effects

PC23 depends on potable water, wastewater, and stormwater systems that are already constrained, damaged, or operating below intended design performance in the Kainga–Spencerville–Lower Styx area. Following the repeal of the previous Three Waters reform programme through the Water Services Entities Repeal Act 2024, responsibility for drinking water, wastewater, and stormwater services has been fully returned to local authorities. However, repeal did not restore the previous status quo. The Government's replacement framework—Local Water Done Well—now requires councils to demonstrate long-term financial sustainability, regionalised coordination of water services, and strict compliance with the Water Services Act 2021 and Taumata Arowai's national water-quality and risk-management standards. These obligations materially heighten the burden on Christchurch City Council. Any new development that increases long-term 3-waters liabilities, particularly in areas with constrained or damaged networks, must now satisfy strengthened sustainability and resilience tests. PC23's reliance on bespoke bores, degraded wastewater infrastructure, unverified pump performance, and stormwater systems exposed to tidal, groundwater, and sea-level-rise influences significantly increases CCC's financial and regulatory risk exposure. The infrastructure assessments provided by the applicant predate the 2024–2025 policy shift and do not demonstrate compliance with the new requirement that growth areas be supported by financially sustainable, climate-resilient, and certifiable water services capable of meeting long-term public-health and environmental performance obligations. The applicant proposes to defer key assessments until after rezoning, despite clear requirements in the NPS-UD, NPS-FM, CRPS, and CDP that

capacity and long-term resilience be demonstrated before zoning or intensification decisions are made.

The evidence, including CCC's own RFI correspondence, indicates that the infrastructure network in this part of Christchurch is at or beyond functional limits. PC23 would impose additional loads that cannot be accommodated without substantial, unbudgeted upgrades, many of which are technically challenging or uncertain under future climate conditions.

### 4.1 Potable Water Supply: No existing capacity and high long-term risk

CCC staff have confirmed that there is no available capacity in the Council's reticulated water supply to service PC23. The previous concerns regarding insufficient potable-water capacity are sharpened under the post-repeal framework. The bespoke on-site bore and treatment plant proposed for PC23 impose long-term monitoring, treatment, and certification obligations that would ultimately fall on CCC or any future regional water entity created under **Local Water Done Well**. The applicant has not demonstrated how source protection, treatment reliability, or long-term compliance with Taumata Arowai standards will be secured. This raises concerns regarding:

- Allocation limits and long-term security of groundwater supply
- Potential interference effects on neighbouring private wells
- Public-health and resilience risks under the Water Services Act

These issues are incompatible with NPS-UD Policy 10, which requires "adequate and resilient" infrastructure.

### 4.2 Wastewater: Network-wide constraints and reduced pump-station performance

The Kainga–Spencerville wastewater network, already degraded and operating below its original design capacity, lacks confirmed ability to service an additional 800 dwellings. Post-2024 regulatory requirements demand that councils verify long-term financial and operational sustainability before approving growth areas. The applicant's modelling assumes pump performance improvements without evidence, ignores infiltration and inflow increases since the Canterbury earthquakes, and fails to address long-term maintenance liabilities. Key constraints include:

- Pump Station PS78's reduced real operating capacity (~30 L/s versus 40 L/s design)
- Earthquake-damaged pipes and high infiltration/inflow (I/I)
- Network spare capacity intended for gradual infill, not large greenfield development

These conditions risk overflows and reduced system performance during wet-weather events.

### 4.3 Stormwater: Severe conveyance limitations and incomplete hydrological assessment

Stormwater management constraints—including basin undersizing, high groundwater, tidal gate dependencies, and the extremely shallow gradient of Spencer Drain—remain unresolved. Under **Local Water Done Well**, councils must ensure stormwater systems are climate-resilient and financially sustainable over the long term. The applicant's stormwater proposal, which relies heavily on excavated basins in a floodplain with rising groundwater and saline intrusion risks, does not meet these requirements. Issues include:

- Wetland and basin sizing errors (factor-of-two underestimation identified by CCC)
- Detention basins located within flood-hazard areas
- Tidal closure and storm-surge influences not modelled
- Groundwater rise reducing basin storage and treatment function

These gaps undermine confidence in long-term flood and stormwater performance.

### 4.4 Lifelines and network resilience

The development's reliance on vulnerable coastal lifelines includes:

- Power supply exposed to storm and salt corrosion
- Telecommunications infrastructure partly located in flood zones
- Wastewater systems dependent on pump operation
- Potable water requiring continuous treatment and power supply

Such dependence on fragile lifelines is inconsistent with resilient urban development principles.

### 4.5 Long-term infrastructure funding is uncertain or absent

PC23 requires major upgrades to roads, bridges, wastewater conveyance, pump stations, and stormwater systems. These upgrades:

- Do not appear in the CCC 2024–2034 Long-Term Plan
- Have not been costed by the applicant
- Have no identified funding source

This fails to meet s32 RMA requirements to demonstrate efficiency and least-cost planning.

### 4.6 Conclusion: PC23 is not serviceable, not resilient, and not compliant with post-2024 water-infrastructure obligations

PC23 cannot be serviced in a manner that is safe, sustainable, or financially credible under the regulatory framework now governing drinking water, wastewater, and stormwater services in New Zealand. Potable water supply depends on an unproven private bore and treatment system with unresolved source-protection, capacity, and certification risks. Wastewater networks in the Kainga–Spencerville corridor remain damaged, hydraulically constrained, and subject to infiltration loads that have not been quantified since the Canterbury earthquakes. Stormwater conveyance is critically limited by shallow gradients, tidal-gate controls, rising groundwater, and the displacement effects of large-scale fill. None of these systems possess redundancy, and none are supported by committed or funded upgrades in CCC's Long-Term Plan.

With the repeal of the Water Services Entities framework and the introduction of the Local Water Done Well regime, councils must now demonstrate that new growth areas are financially sustainable, climate-resilient, and capable of meeting Taumata Arowai performance standards over the full asset life cycle. PC23 fails each of these tests. Its servicing model is dependent on speculative assumptions, defers critical analysis to post-rezoning stages, and exposes CCC to significant long-term liabilities for which no funding pathway exists. The applicant's evidence predates the 2024–2025 policy shift and does not satisfy the strengthened statutory duty to ensure safe and resilient Three Waters infrastructure before committing new land to urban use.

Accordingly, the Three Waters and lifelines environment for PC23 is inadequate, unresilient, and inconsistent with national and regional planning direction, including:

NPS-UD Policy 1 – requirement for well-functioning, infrastructure-aligned urban environments

NPS-FM / Te Mana o te Wai – protection of drinking-water sources and freshwater health

CRPS Chapter 6 – integrated, sustainable infrastructure and hazard-resilient urban form

Christchurch District Plan infrastructure policies – ensuring servicing feasibility prior to zoning decisions

PC23 should therefore be declined. At minimum, it must be deferred until a complete, independently peer-reviewed Three Waters and lifelines assessment is produced,

demonstrating long-term viability, regulatory compliance, and financial sustainability under the post-repeal framework.

## 5. Stormwater, Floodplain Function & Hydraulic Constraints

Stormwater management is one of the most critical determinants of the long-term safety and viability of PC23. The Whisper Creek site lies within a low-gradient coastal plain characterised by shallow groundwater, tidal influences, limited conveyance capacity, and a history of widespread flooding. Stormwater solutions must therefore be robust enough to function under increased rainfall intensity, rising groundwater, sea-level rise, tidal closure events, elevated Styx River water levels, and backwater conditions during Waimakariri flood events.

### 5.1 The Turners Road stormwater system is hydraulically constrained

The stormwater catchment draining to Turners Road relies on Spencer Drain, which has an extremely shallow gradient (~1:6000), tidal flood-gates at the Styx mouth, and a wide floodplain storage system. These features restrict stormwater discharge, extend detention times, and require basins capable of performing under frequent tailwater constraints. The applicant's modelling does not address these dynamics.

### 5.2 CCC has identified significant basin sizing errors

CCC engineers have noted a factor-of-two error in the wetland sizing calculations, incorrect detention assumptions, and missing storage volumes necessary for water-quality treatment and flood attenuation. These errors materially understate peak discharges, overtopping risk, and wetland performance.

### 5.3 Reliance on basins located within flood-hazard areas

Several proposed stormwater basins and wetlands are located within the Lower Styx Ponding Area and High Flood Hazard Management Area (HFHMA). Basins within these zones face reduced detention volume, increased backflow risk, and unpredictable performance during Waimakariri flood closures. This conflicts with CDP 5.4.1, CRPS 11.3.2(4), and Te Mana o Te Wai Objective 1.

### 5.4 Flood-storage displacement from extensive filling has not been quantified

The applicant proposes extensive filling to achieve minimum Finished Floor Levels, but has not provided 1:1 compensatory storage analysis. Filling within the Lower Styx Ponding Area risks reducing storage volume, increasing flood levels, and altering flow paths. Deferring analysis until after model updates conflicts with MfE (2022), CRPS 6.6.1, and CDP 5.4.2.

### 5.5 Rising groundwater undermines stormwater function

NZSeaRise (2022) indicates effective sea-level rise of 0.3–0.4 m by 2050. Rising

groundwater reduces basin storage volume, compromises wetland vegetation, and eliminates infiltration capacity. The applicant has not provided future groundwater modelling or salinity intrusion assessment.

### 5.6 Tidal closure, storm surge, and backflow have not been modelled

Stormwater systems at coastal interfaces must account for tidal locking, storm surge, Waimakariri flood-gate closures, and Styx River tailwater conditions. These influences can prevent stormwater discharge, cause backflow, and fill basins from downstream. The applicant's modelling excludes these dynamics, despite CCC's requests.

### 5.7 Stormwater quality treatment is insufficient for an ecologically degraded catchment

The Styx River is ecologically degraded, with elevated zinc levels, declining EPT indices, and sediment accumulation. Under the NPS-FM and Te Mana o Te Wai, waterway health must be prioritised. The applicant's treatment system relies on undersized wetlands and does not account for saline intrusion or increased contaminant loading from high-density housing.

### 5.8 Conclusion

Stormwater and floodplain effects for PC23 remain inadequately assessed, reliant on outdated modelling, unsupported by compensatory storage analysis, and compromised by rising groundwater. The proposal does not meet requirements under MfE (2022), CRPS, NPS-FM, NPS-UD, and CDP provisions. Rezoning must not proceed until stormwater performance is fully modelled and demonstrated to be resilient under future climate and hydrological conditions.

## 6. Transport, Traffic Safety & Tsunami Evacuation

Transport safety and evacuation performance are central determinants of whether a residential rezoning can occur safely and efficiently. PC23 proposes 800 dwellings in an area serviced by narrow rural roads, a one-lane bridge, substandard intersections, and no public transport. These constraints cannot safely accommodate the development's projected traffic volumes, let alone provide a reliable evacuation route during tsunami or extreme flood events.

### 6.1 Existing Road Network Constraints

The local road network serving the Whisper Creek site consists primarily of:

- Turners Road – a low-volume rural road with limited shoulders and poor alignment
- Spencerville Road – narrow, with constrained geometry approaching the one-lane bridge
- Kainga Road – servicing both residential and rural traffic
- Marshland Road – already operating near capacity at peak times, including Chaney's Corner

The applicant has not provided evidence that these roads can maintain acceptable performance under normal peak-hour operations, let alone during emergency evacuations.

### 6.2 One-Lane Bridge and Intersection Hazards

The Spencerville one-lane bridge presents a major bottleneck, with:
• insufficient width for two-way evacuation flow
• poor sight lines
• documented queuing during recreational peak periods
• no redundancy in the event of blockage or failure

Additionally, intersections at Spencerville/Kainga Road and Marshland/Kainga Road have substandard geometry and limited capacity. No upgrade plans are provided.

### 6.3 Absence of Public Transport and Increased Vehicle Dependence

There has been no public transport service to Spencerville or Turners Road since 2019. Residents of an 800-dwelling development would therefore be entirely dependent on private vehicles. This conflicts with:
• NPS-UD Policy 1 (well-functioning urban environments)
• CCC climate and emissions-reduction strategies
• CRPS urban form and transport integration objectives

Vehicle dependence also increases exposure to congestion and delays during emergency evacuations.

### 6.4 Underestimated Traffic Generation

The applicant's traffic assessment assumes approximately 720 vehicle trips per peak period. This is inconsistent with comparable developments and empirical trip rates. A more realistic estimate is 1,400–1,600 peak-hour trips. Without accurate modelling, downstream impacts on:
• Chaney's Corner
• Marshland Road
• Spencerville Road
• Kainga Road intersections
cannot be reliably assessed.

### 6.5 Tsunami Evacuation Performance Not Demonstrated

The site lies within a tsunami evacuation corridor. Safe evacuation requires:
• accurate travel-time modelling
• performance under peak occupancy
• modelling of bottlenecks (bridge, intersections)

• assumptions for school populations
• sensitivity testing under multiple hazard scenarios

None of this has been provided. NZTA-standard modelling is essential for developments of this scale.

### 6.6 Lack of Redundancy and Lifeline Dependencies

There is no alternative evacuation route if:
• the one-lane bridge is blocked
• Marshland Road becomes congested
• power outages disable traffic control
• flooding restricts road access

Given the site's location within a coastal hazard zone, redundancy is essential for life-safety obligations.

### 6.7 Effects on Spencerville and Ouruhia Communities

The increased traffic from 800 dwellings will impose:
• greater noise and safety risks
• access difficulties for Spencerville residents
• higher congestion for school routes
• conflicts with recreational traffic to Spencer Park and Bottle Lake Forest

CCC's RFI notes that increased traffic will require substantial upgrades, none of which are funded in the CCC Long-Term Plan.

### 6.8 Consistency with Planning Instruments

PC23 does not meet:
• CRPS 6.3.1 – avoid patterns that increase hazard exposure
• CRPS 6.3.4 – transport infrastructure must support urban form
• CDP transport objectives for safe and efficient movement
• NPS-UD well-functioning urban environment policies

### 6.9 Conclusion

Transport, traffic safety, and tsunami-evacuation performance for PC23 remain unmodelled, underestimated, or unaddressed. The site's access constraints, lack of public transport, and absence of redundancy represent significant risks to both existing and future residents. Until robust modelling and funded infrastructure upgrades are provided, PC23 should not proceed.

## 7. MDRS, Qualifying Matters, and Clause 25(4A) Requirements

The Medium Density Residential Standards (MDRS) and the provisions introduced under the Enabling Housing Supply Amendment require that territorial authorities enable intensification unless specific, spatially identified Qualifying Matters (QMs) justify a reduction in development capacity. Private Plan Change 23 relies on incomplete or incorrect application of these requirements and has not provided the analyses or spatial hazard data needed to lawfully reduce MDRS standards or justify a bespoke zoning outcome.

### 7.1 Clause 25(4A) Requirements Have Not Been Met

Clause 25(4A) of Schedule 1 of the RMA requires councils to incorporate the MDRS into all residential zones unless:

- a Qualifying Matter applies; and
- the QM is spatially identified; and
- the reduction in development capacity is the "least modification necessary"; and
- alternatives have been assessed.

The applicant has not:

- provided spatial mapping of any Qualifying Matter,
- carried out a s77L assessment of alternative development forms,
- demonstrated why RNN zoning is appropriate for an area with significant hazard overlays,
- identified any lawful QM that justifies reduced enablement.

### 7.2 Incorrect Use of "Open Space" as a Qualifying Matter

The applicant asserts that "open space" functions as a Qualifying Matter. This is incorrect. QMs must:

- be identified in legislation (e.g., s77I(1)(d): natural hazards), or
- be based on specific physical constraints.

Open space zoning is not a QM unless linked to a physical constraint. The applicant proposes RNN zoning over hazard-prone areas without acknowledging that:

- the lower terrace is within HFHMA and ponding areas,
- coastal hazards under MfE (2022) apply,
- liquefaction and lateral-spread risks are unquantified.

Thus, the QM is the hazard itself, not the zoning label, and must be spatially mapped.

### 7.3 Absence of Spatial Hazard Mapping

The applicant has not supplied spatial hazard maps for:

- liquefaction susceptibility,
- lateral-spread risk zones,

• tsunami evacuation pathways,
• groundwater rise,
• flood-storage or ponding areas.

Under the RMA, without hazard mapping, the Council cannot apply QMs correctly or determine whether MDRS reductions are justified. This is a fundamental information deficiency.

### 7.4 Failure to Follow s77L Evaluation of Alternatives

To justify reduced development capacity, the applicant must demonstrate:
• why MDRS-enabled development is inappropriate in this specific location,
• how the proposed RNN zoning is the "least modification necessary,"
• what alternative layouts or densities were considered.

The applicant provides none of this. No density comparisons, alternative layouts, or risk-based zoning options have been explored. This violates s77L requirements and renders the plan change inconsistent with the MDRS framework.

### 7.5 Conflict with CRPS and Christchurch District Plan Policies

CRPS and CDP provisions require hazard risk to be avoided, not mitigated through ad hoc zoning. Key conflicts include:
• CRPS 6.6.1 – avoid increasing natural hazard risk,
• CRPS 11.3.2(4) – avoid new development in high-hazard areas,
• CDP 5.3.1 – avoid coastal hazard exposure,
• CDP 5.4 – maintain ponding and flood-storage function.

The lower terrace and ponding areas are inherently unsuitable for MDRS-level development. Without spatial QMs, the proposal conflicts with both regional and district policy.

### 7.6 Deferred Hazard and Infrastructure Analysis is Inconsistent with MDRS Requirements

The applicant proposes to:
• undertake groundwater–SLR modelling after rezoning,
• redesign wetlands after new flood models are released,
• quantify flood-storage displacement "later,"
• reassess liquefaction and lateral-spread risk "post-rezoning."

This is incompatible with MDRS and QM requirements. QMs must be justified at the rezoning stage, not deferred.

### 7.7 Inadequacy of the s32 Evaluation

The s32 analysis must:

• identify costs and benefits,
• examine alternatives,
• provide evidence supporting reduced MDRS enablement.

PC23's s32 evaluation:
• does not quantify infrastructure costs,
• omits alternative development scenarios,
• lacks hazard and groundwater evidence,
• underestimates Three Waters constraints,
• does not analyse long-term resilience.

Therefore, the s32 assessment is incomplete and does not support adoption of the plan change.

### 7.8 Conclusion

PC23 does not satisfy the legal requirements of MDRS or Clause 25(4A). The applicant has not provided spatial QMs, has not met s77L requirements, and relies on deferred investigations that cannot justify reduced enablement. Without robust hazard mapping and evaluation of alternatives, CCC cannot lawfully approve PC23. The plan change should therefore be declined or deferred until full compliance with MDRS, QM, and s32 obligations is demonstrated.

## 8. Ecology, Biodiversity & Te Mana o Te Wai

The Whisper Creek proposal is located within the lower Pūharakekenui/Styx River catchment, an ecologically sensitive, culturally significant, and hydrologically complex environment. The catchment is already exhibiting signs of ecological decline, including elevated zinc levels, sediment accumulation, declining macroinvertebrate indices, and degradation of riparian habitat. Under the National Policy Statement for Freshwater Management (NPS-FM 2020) and the Te Mana o Te Wai framework, the health of the waterbody must be prioritised above the proposed land-use change. PC23 does not meet these obligations.

### 8.1 Declining Ecological Health of the Pūharakekenui/Styx River

The 2023 Boffa Miskell ecological monitoring report for the Styx catchment documents:
• elevated zinc concentrations in stream sediments,
• reduced EPT (Ephemeroptera–Plecoptera–Trichoptera) indices indicating lower water-quality and macroinvertebrate health,
• increased fine-sediment deposition over benthic habitats,

• low Macroinvertebrate Community Index (MCI) scores, and
• degradation of instream and riparian ecological integrity.

Any increase in sediment, metals, or nutrient loads from urban runoff will further degrade an already stressed ecosystem. PC23 would introduce a significant new source of contaminant generation into this catchment.

### 8.2 Insufficient Riparian Buffers and Habitat Fragmentation

The lower terrace is part of a continuous ecological corridor used by:
• at-risk wading birds,
• native freshwater fish including tuna/eels and īnanga,
• lizard species,
• long-tailed bats (potential seasonal habitat), and
• diverse invertebrate communities.

The applicant does not provide:
• continuous 20 m riparian buffers,
• habitat connectivity analysis,
• assessment of fragmentation effects,
• mapping of seasonal wetland values, or
• protection measures for threatened species.

Spatial omissions weaken the ecological assessment and prevent CCC from determining whether ecological effects can be avoided, remedied, or mitigated.

### 8.3 Stormwater Quality Treatment is Inadequate for a Sensitive Catchment

The applicant's stormwater quality treatment system is based on undersized wetlands, unverified detention assumptions, and incomplete peak-flow modelling. For an ecologically degraded waterway like the Styx, this is insufficient.

Potential effects include:
• mobilisation of zinc from roofing materials,
• sediment pulses from construction and urban runoff,
• hydrocarbon contaminants from vehicle movements,
• long-term nutrient loading,
• wetland vegetation die-off from salinity intrusion.

Without high-confidence water-quality treatment, PC23 risks exacerbating catchment decline. Under Te Mana o Te Wai, such effects are unacceptable unless avoided at the source.

### 8.4 Failure to Apply the Te Mana o Te Wai Hierarchy of Obligations

Te Mana o Te Wai establishes a three-tiered hierarchy:

1. First: the health and wellbeing of waterbodies and freshwater ecosystems
2. Second: the essential health needs of people
3. Third: other social, economic, and cultural uses

PC23 does not satisfy Tier 1 because:

- wetlands and basins are undersized,
- the design assumes outdated hydrological models,
- the proposal increases contaminant loads,
- groundwater–SLR interactions are unmodelled,
- ponding and floodplain storage functions are compromised.

Enabling housing is a Tier 3 activity. It cannot override Tier 1 obligations unless ecological health is protected first.

### 8.5 Seasonal Wetlands and Groundwater-Dependent Ecosystems

The lower terrace contains seasonal wet patches, groundwater-fed wetlands, and shallow-saturated soils that support:

- native sedges,
- wetland birds,
- amphibians,
- invertebrates dependent on ephemeral habitat.

These ecosystems are sensitive to:

- fill placement,
- groundwater drawdown,
- sedimentation,
- changes in surface-water dynamics.

The applicant has not mapped these habitats nor assessed effects on them.

### 8.6 Cumulative Effects on the Catchment

Cumulative effects are a major concern because:

- the Styx catchment already receives stormwater from urban areas,
- the receiving environment is showing progressive degradation,
- flood events mobilise sediment and contaminants downstream,
- PC23 would add an additional 800 dwellings' worth of runoff and pollutants.

Under the NPS-FM, cumulative degradation must be halted and reversed. PC23 provides no pathway to achieve this.

### 8.7 Inconsistency with Policy Direction

PC23 is inconsistent with:

- NPS-FM (2020) – maintain and improve freshwater health,
- Te Mana o Te Wai – prioritise ecological health,
- CRPS Chapter 7 – protect and enhance biodiversity,
- Christchurch Biodiversity Strategy – avoid fragmentation of key habitats,
- CDP 8.6.1 and 8.6.2 – protect indigenous biodiversity and natural values.

Given the site's proximity to the Styx River and its ecological significance, the burden of proof lies with the applicant to demonstrate no net loss of biodiversity and freshwater health. They have not provided the necessary analysis.

### 8.8 Conclusion

Ecological and freshwater effects associated with PC23 remain incompletely assessed, underestimated, or inconsistent with statutory requirements. With declining Styx catchment health, inadequate treatment systems, missing habitat mapping, and unaddressed cumulative effects, PC23 cannot satisfy the obligations of the NPS-FM, Te Mana o Te Wai, CRPS, or CDP ecology provisions. Rezoning should not proceed until full ecological and freshwater assessments are completed and demonstrate protective outcomes for the Pūharakekenui/Styx River.

## 9. Cultural, Archaeological & Heritage Values

The Whisper Creek proposal is located within the lower Pūharakekenui/Styx River catchment, an ecologically sensitive, culturally significant, and hydrologically complex environment. This landscape contains evidence of early Māori occupation, mahinga kai, travel routes, and intergenerational associations that remain relevant today. Any rezoning proposal of this scale must demonstrate that cultural values have been identified, understood, and protected—something PC23 does not achieve.

### 9.1 Introduction and Context

This section provides an updated assessment of the cultural and heritage implications of Private Plan Change 23 (PC23) for Te Ngāi Tūāhuriri Rūnanga, the manawhenua authority for the Pūharakekenui/Styx River catchment. It supersedes the preliminary cultural information appended to the applicant's material (Mahaanui Kurataiao, January 2022), which was prepared for a substantially smaller, different, and less hazardous proposal advanced under the COVID-19 Fast-track Consenting Act. That document cannot be relied upon to represent rūnanga interests in relation to the present 800-dwelling rezoning request, which introduces materially different effects, hazards, and infrastructure pressures.

Ngāi Tahu have a longstanding cultural, historical, and genealogical relationship with the Pūharakekenui/Styx River and its associated wetlands, mahinga kai, and cultural landscapes. Protection of Ngā Wai—the water bodies of particular cultural significance—is central to the Mahaanui Iwi Management Plan (IMP). PC23 sits directly within this culturally sensitive landscape and triggers significant concerns relating to waterway health, sedimentation, contaminated stormwater, freshwater ecology, hydrological alteration, cultural heritage, and intergenerational kaitiakitanga responsibilities.

## 9.2 The 2022 Preliminary Cultural Assessment Does Not Apply to PC23

Te Ngāi Tūāhuriri Rūnanga declined to prepare a Cultural Impact Assessment (CIA) likely sometime in 2021 on the basis of an outdated proposal comprising approximately 200 dwellings, relying on existing water supply, avoiding the Flood Ponding Management Area, and maintaining a comparatively modest construction footprint. That earlier design contemplated naturalised drainage systems and more limited ecological and hydrological effects.

The PC23 rezoning request now before the Council is fundamentally different:

• quadrupled residential yield (800 dwellings rather than ~200);

• large-scale earthworks and extensive filling within the Lower Styx Ponding Area;

• reliance on a private bore and on-site treatment plant rather than the reticulated water network;

• materially increased wastewater, stormwater, and sedimentation pressures;

• stormwater basins and wetlands exposed to rising groundwater, tidal closure events, saline intrusion, and floodplain inundation;

• dramatically increased impervious surfaces and contaminant loads entering Spencer Drain and the Styx River; and

• a significantly greater likelihood of encountering archaeological and wāhi taonga sites.

Given these changes, Te Ngāi Tūāhuriri Rūnanga have never had the opportunity to assess, comment on, or provide kaitiaki guidance for the actual development proposed. Their preliminary 2022 position cannot be taken as endorsement—explicit or implicit—of PC23. A new CIA is required.

## 9.3 Effects on Pūharakekenui/Styx River (Ngā Wai)

The Pūharakekenui/Styx River is a Ngā Wai, a category of water explicitly requiring protection in the Mahaanui IMP. PC23 introduces several major risks inconsistent with the IMP's cultural provisions (P4.1, P6.1, P11.1, P11.9, WM6.19):

• Hydrological alteration: Extensive filling in the Lower Styx Ponding Area will displace floodwaters, alter flood behaviour, and modify natural drainage patterns that underpin the cultural landscape.

• Rising groundwater: NZSeaRise (2022) projections indicate effective sea-level rise of 0.3–0.4 m by 2050, reducing stormwater treatment performance, threatening wetland vegetation survivability, and mobilising contaminants.

• Contaminant loading: An 800-dwelling subdivision will generate significant zinc, copper, hydrocarbons, microplastics, and sediment, which are incompatible with the cultural requirement to maintain and improve water quality.

• Tidal and backflow effects: Stormwater systems draining into Spencer Drain will be affected by tidal closure, storm surge, and backflow during Waimakariri River flood-gate closures—none of which have been assessed.

• Wetland sizing errors: CCC engineers have identified a factor-of-two calculation error in wetland sizing, undermining claims of adequate treatment performance.

These cumulative effects pose substantial risks to the cultural health and mauri of the river, contrary to Te Mana o te Wai and the Mahaanui IMP.

## 9.4 Effects on Mahinga Kai

Mahinga kai values in the Styx corridor are of fundamental significance to Te Ngāi Tūāhuriri Rūnanga. They include tuna, īnanga, invertebrates, kākahi, riparian flora, and habitat connectivity across the dune–swale–floodplain mosaic.

PC23 undermines these values by:

• increasing sedimentation and turbidity;

• degrading invertebrate habitat;

• altering riparian hydrology and groundwater–surface water interactions;

• increasing pollutant loads beyond the assimilative capacity of the catchment; and

• threatening connectivity of ecological and cultural habitat.

The applicant has provided no assessment of effects on mahinga kai, nor demonstrated how mahinga kai values will be protected, restored, or enhanced. This is a substantive deficiency.

## 9.5 Cultural Landscape and Heritage Risks

The lower Styx corridor is a cultural landscape with known and likely wāhi taonga, archaeological sites, pre-contact settlement features, and historical mahinga kai locations. The PC23 proposal involves:

• extensive excavation;

• deep trenching;

• large-scale subsoil disturbance; and

• significant recontouring of the landscape.

The applicant has relied solely on an Accidental Discovery Protocol (ADP), which is appropriate only for low-risk sites. A project of this scale requires:

• an updated CIA;

• a cultural landscape assessment; and

• an archaeological investigation by a qualified archaeologist.

Failing to obtain these assessments risks breaching s6(e) RMA (relationship of Māori with ancestral lands, water, sites, wāhi tapu, and taonga).

## 9.6 Te Mana o te Wai Obligations Not Met

Under the NPS-FM (2020), Te Mana o te Wai establishes a strict hierarchy:

1. Protect the health and well-being of water bodies (including Ngā Wai)

2. Provide for human health needs (drinking water)

3. Enable social and economic well-being

PC23 reverses this sequence by:

• prioritising residential development over waterway health;

• relying on unproven and potentially vulnerable private drinking-water sources;

• introducing stormwater systems unlikely to perform under future climate and groundwater conditions; and

• increasing pollutant inputs into a degraded cultural waterway.

A rezoning decision that diminishes waterway health is contrary to national direction, the Mahaanui IMP, and the cultural expectations of Te Ngāi Tūāhuriri Rūnanga.

## 9.7 Procedural Inadequacy of Engagement

Mahaanui IMP Policy P4.1 requires:

• early and meaningful engagement with rūnanga;

• identification of effects on tangata whenua values;

• assessment of cumulative effects;

• culturally appropriate mitigation measures; and

• use of CIA reports for developments with potential cultural impacts.

PC23 fails each of these requirements. No updated engagement with Te Ngāi Tūāhuriri Rūnanga has occurred despite the substantial change in scale, hazard environment, and infrastructure footprint. The absence of any recent consultation is inconsistent with good-faith engagement and with the expectations of both the RMA and the IMP.

## 9.8 Conclusion: PC23 is Inconsistent with Cultural, Heritage, and Kaitiakitanga Obligations

On the basis of the above analysis, PC23:

• relies on an outdated and inapplicable cultural assessment;

• has not assessed effects on Ngā Wai or mahinga kai in accordance with Te Mana o te Wai;

• introduces significant unassessed hydrological and contaminant risks to a culturally sensitive river system;

• increases risks to wāhi taonga and archaeological heritage;

• lacks the engagement required under the Mahaanui IMP; and

• cannot be said to represent or protect the cultural values of Te Ngāi Tūāhuriri Rūnanga.

Until a complete, updated Cultural Impact Assessment is prepared in partnership with Te Ngāi Tūāhuriri Rūnanga, PC23 cannot be considered consistent with the cultural, environmental, and statutory obligations governing the protection of tangata whenua values. The rezoning request should therefore be declined, or at minimum deferred, until

such an assessment is produced and its recommendations fully incorporated into the planning framework.

## 10. Contamination, Public Health & Soil / Groundwater Quality

The Whisper Creek proposal involves extensive earthworks, large-scale excavation of stormwater lakes, importation of fill, and development on land previously associated with horticultural activities and floodplain deposition. These factors introduce significant risks relating to soil contamination, groundwater quality, dust generation, and public-health exposure. The applicant has not completed the assessments required under the National Environmental Standard for Assessing and Managing Contaminants in Soil (NES-CS), nor provided sufficient evidence for CCC to evaluate long-term public-health risks.

### 10.1 NES-CS Applicability and Incomplete Site Contamination Assessment

The National Environmental Standard for Contaminants in Soil applies when a site has:
• past horticultural use,
• storage or use of agrichemicals,
• structures or soils with potential heavy-metal residues,
• excavation or soil disturbance over large areas.

The site has a long history of horticultural activity, meaning NES-CS should have been triggered. The applicant has not provided:
• a Detailed Site Investigation (DSI),
• sampling for heavy metals (lead, arsenic, copper),
• pesticide residue testing,
• analysis of contamination in areas proposed for excavation or fill.

Without a DSI, potential public-health risks cannot be assessed.

### 10.2 Risks from Imported Fill

PC23 requires substantial fill placement across the lower terrace. Risks include:
• contaminated fill from offsite sources,
• variable material quality affecting geotechnical performance,
• introduction of asbestos, hydrocarbons, or heavy metals,
• fill settlement issues under rising groundwater.

CCC's RFI requested confirmation of fill source, certification, and testing protocols. None have been provided.

### 10.3 Groundwater Quality and Salinity Intrusion

Groundwater beneath the site is shallow and influenced by tidal cycles. Concerns include:

• vertical migration of contaminants through permeable soils,
• mobilization of legacy horticultural chemicals,
• salinity intrusion from sea-level rise affecting groundwater chemistry,
• impacts on private wells used by surrounding communities.

The applicant proposes deep groundwater bores for potable water but has not assessed how rising salinity or contamination could compromise water supply.

### 10.4 Dust, Construction Contaminants & Public Health

Earthworks over large areas can generate:
• particulate matter (PM10 and PM2.5),
• contaminated dust containing heavy metals or pesticide residues,
• airborne asbestos if present in fill,
• nuisance and respiratory risks to nearby residents.

The applicant has not supplied:
• a dust management plan,
• contaminant-dust assessment,
• mitigation measures for prevailing nor'easterly winds that carry dust toward Spencerville and Ouruhia.

### 10.5 Soil Stability, Groundwater & Contaminant Transport

The interaction between:
• shallow groundwater,
• fill placement,
• liquefaction-prone soils, and
• stormwater infiltration
creates pathways for contaminant migration.

Without groundwater modelling, CCC cannot determine whether contaminants may be transported into stormwater basins or adjacent properties during flood events.

### 10.6 Public-Health Risks from Private Potable Water Supply

If PC23 relies on private water treatment systems, long-term risks include:
• system failure due to power outages,
• inconsistent treatment efficacy,
• vulnerability to contamination during groundwater rise,
• unclear responsibilities for monitoring and compliance.

Residents would be more exposed to health risks than those connected to council-supplied drinking water.

### 10.7 Consistency with Policy Requirements

The proposal is inconsistent with:
• NES-CS – lack of DSI and contamination testing,
• Part 2 RMA – protecting human health,
• NPS-FM – ensuring sources of human drinking water are protected,
• CDP contamination and earthworks policies.

10.8 Conclusion
Given the absence of a Detailed Site Investigation, lack of fill-quality assurance, unassessed groundwater contamination pathways, and inadequate dust and public-health assessments, PC23 presents unacceptable risks to human health and water quality. Rezoning should not proceed until a full NES-CS DSI, groundwater modelling, and public-health assessment are completed.

## 11. Urban Form, Centres Hierarchy, Urban Design, Landscape, and Economic Effects

### 11.1 Policy Context and Strategic Framework

This section evaluates PC23 against the statutory and strategic frameworks governing Christchurch's urban form, centres hierarchy, transport integration, and landscape outcomes. These include:

- **National Policy Statement on Urban Development (NPS-UD)**
  – Policies 1, 3, 6: well-functioning urban environments, integration of land use and transport, reduced emissions, accessibility, walkability, and multimodal choice.

- **Canterbury Regional Policy Statement (CRPS)**
  – Chapters 5 and 6: consolidated urban form, avoidance of leapfrog growth, protection and strengthening of the centres hierarchy, sequencing and efficient infrastructure, and resilience to natural hazards.

- **Christchurch District Plan (CDP)**
  – Chapter 3: Strategic Directions
  – Chapter 6: Urban Growth and Form
  – Chapter 15: Commercial Activities and Centres-Based Framework
  – Residential New Neighbourhood (RNN) Zone policies.

Together, these instruments explicitly direct Christchurch toward **compact, well-integrated, multimodal, hazard-resilient expansion** anchored on a **polycentric hierarchy of viable, strategically located centres**.

PC23 is evaluated against this framework, with explicit reference to LMM's supporting appendices (A: Economics, E: Transport, F: Landscape, F-i: Landscape Graphics, G: Urban Design). As demonstrated below, these appendices do not substantively address the decisive policy tests required of a private plan change seeking the creation of a new, semi-isolated urban node.

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## 11.2 Strategic Urban Form and Consolidation Effects

### 11.2.1 A Peripheral, Non-Contiguous Satellite Settlement

PC23 is geographically and functionally **detached** from the existing urban fabric. It is:

- 2 km from Prestons,
- 3–4 km from Belfast/Northwood,
- 5+ km from the nearest full-service retail centre, and
- entirely outside any planned PT corridor or high-frequency multimodal spine.

This places PC23 squarely in the category that the CRPS warns against: **a "leapfrog", peripheral, car-dependent settlement pattern** that extends the urban footprint into rural/coastal-margin landscapes without structural integration.

The applicant's narrative that the site is already "urban" because of the Specific Purpose (Golf Resort) zoning misstates the relevant planning test. The golf-resort regime was a **destination-based tourism and recreation zone**, not a suburban extension. Replacing it with 800 dwellings yields a materially different pattern of **daily transport demand, emissions, infrastructure load, and catchment form**, and therefore triggers a fundamentally different policy assessment.

### 11.2.2 Conflict with the CRPS Requirement for Consolidated Urban Form

CRPS 6.3.1 and 6.3.2 require that:

- new urban areas adjoin existing ones,
- growth be sequenced to infrastructure capacity,
- and development patterns support multimodal transport.

PC23 fails all three criteria:

1. **Non-adjoining**: The project is surrounded on three sides by semi-rural land, low-density lifestyle blocks, and hazard-constrained land.
2. **Poorly sequenced**: There are no planned Council upgrades to support 800 additional homes on rural roads (CCC LTP 2024–34 shows no such investment).
3. **Not multimodal**: No public transport, no safe cycling infrastructure, and unsafe/indirect pedestrian connections.

See also:

- Section **3.1–3.4** for the detailed groundwater, inundation, and tsunami exposure analysis that fundamentally constrains feasible urban form.
- Section **3.3 d**emonstrates that liquefaction, lateral spread, and settlement risk directly undermine the residential densities assumed in Appendix A.
- Section **4** ('Post Three Waters Impacts') demonstrates that PC23 cannot be serviced to the standard required by RNN policies or NPS-UD Policy 1.
- Section **4.1–4.3** as well as 5.1 demonstrates that wastewater and stormwater constraints prevent the 'well-functioning urban environment' asserted in Appendix G.

### 11.2.3 "Walkability" Without Destinations Is Not Urban Integration

The applicant repeatedly asserts walkability because internal roads form a connected grid. But walkability is a **function of meaningful destinations within a 5–10 minute radius**, not simply footpaths within the subdivision.

PC23 provides:

- No school
- No medical centre
- No supermarket
- No employment base
- No public transport
- A commercial node too small to serve daily needs

Thus, internal footpaths become little more than a means to walk between houses and parking spaces. This fails NPS-UD Policy 1 ("well-functioning urban environments") and CDP Chapter 6 ("efficient urban patterns").

See also:

- Section **10:** Transport evidence summarised confirms that safe pedestrian or cycling access to the proposed hub is not feasible.
- See especially section **10.2–10.4** for quantified deficiencies in access roads that render the hub non-viable and inconsistent with CDP Chapter 15.

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## 11.3 Centres Hierarchy and Commercial Viability

### 11.3.1 The Proposed "Hub" Is Not a Centre Under CCC Policy

The Christchurch Centres-Based Framework is explicit:

- Centres must be **viable**, **strategically located**, **multimodal**, and **able to service more than one neighbourhood**.
- CCC discourages **isolated, single-catchment, small-format nodes** that fragment demand and undermine the vitality of established centres.

PC23's proposed 0.3–0.45 ha "community and commercial hub" is:

- located at a **dead-end fringe**, not on a collector/arterial corridor,
- reachable only by car for anyone outside the subdivision,
- too small to anchor genuine mixed-use activity, and
- without sufficient catchment to sustain turnover.

LMM's own economic assessment confirms higher-order needs will continue to be met in Prestons, Northwood, Marshland Road, and The Palms—implicitly admitting the PC23 "hub" cannot function as a centre.

### 11.3.2 Failure of Agglomeration Thresholds

A viable neighbourhood centre requires:

- 3,000–5,000 residents in walking catchment,
- two-sided catchment draw,
- daily footfall from passing trade or public transport.

PC23 has:

- ~1,900 residents (800 dwellings × avg occupancy),
- **zero** passing trade,
- **zero** PT service,
- **zero** connected secondary catchment (Prestons & Spencerville are too distant to walk).

The structure is economically non-viable and structurally inconsistent with CDP 15.1.2.1 ("avoid proliferation of small commercial nodes in inappropriate locations").

### 11.3.3 Risk of Undermining Prestons Centre

The Prestons Local Centre has struggled to reach full viability and occupancy, even though:

- it is adjacent to high-density housing;
- it is directly connected to Marshland Road;
- it sits on a PT route.

PC23 introduces a competing node:

- Just large enough to draw leakage for low-margin convenience retail;
- Too small to form a distinctive centre identity;
- In the same broader catchment as Prestons.

This results in **mutual weakening**, where both centres underperform—a known pattern in polycentric urban form literature (Berry 1971; Guy 1998; Dunham-Jones 2010).

### 11.3.4 LMM's Economic Assessment Fails the Required Policy Test

Appendix A does not provide:

- retail gravity modelling;

- trade-draw analysis;
- VKT-based demand distribution;
- assessment of centres vitality;
- assessment of the hierarchy's orderly functioning.

Instead, the report relies on the assertion that the hub is "small" and "demand driven". Smallness is **not** a mitigation; it is a key risk factor for failure.

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## 11.4 Economic and Retail Distribution Effects

### 11.4.1 The Counterfactual Is Invalid

Appendix A compares PC23 to a hypothetical **golf resort** that has never materialised and is inconsistent with contemporary policy direction. This artificially inflates the perceived relative benefits of rezoning.

### 11.4.2 Construction Benefits Are Generic and Overstated

The GDP and FTE estimates:

- are mechanically scaled from dwelling count (multipliers),
- do not account for hazard-driven engineering costs,
- do not offset the long-term infrastructure burden on CCC,
- and are therefore not net economic benefits.

### 11.4.3 Externalities Omitted

The report omits:

- increased car travel (720 peak-hour trips, 6,560 daily movements),
- emissions costs,
- network congestion,
- increased emergency response times,
- increased stormwater management costs in a climate-sensitive floodplain,

- loss of rural character and recreational amenity.

### 11.4.4 No Consideration of Long-Term Land Use Efficiency

The land is hazard-prone, low-lying, and physiographically unsuitable for intensification. A higher dwelling yield here **does not** represent optimal land use—contrary to the report's assertions.

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## 11.5 Urban Design Integration and Walkability

### 11.5.1 Misrepresentation of "Integration"

The Urban Design Assessment (Appendix G) claims integration because:

- internal roads form a grid;
- edges have landscaping;
- the subdivision connects to three existing roads.

This confuses **geometric adjacency** with **functional integration**. A well-designed grid does not compensate for:

- the absence of multimodal transport,
- a lack of proximate services,
- inability to accommodate safe cycling,
- rural-speed boundaries with no footpaths,
- a design reliant on car access for all daily needs.

### 11.5.2 Walkability Claims Are Unsupported

The report provides no:

- walking catchment analysis,
- pedestrian level-of-service evaluation,
- safe cycling route assessment,
- analysis of walkability to essential services (because none exist nearby).

### 11.5.3 The Rural–Urban Interface Is Not Credibly Managed

Setbacks and "rural fencing" are decorative, not structural.

Appendix F-i graphics show:

- medium-density housing visually exposed to Turners Road,
- uninterrupted roof planes visible from Lower Styx Road,
- minimal seasonal screening,
- night-sky glow across the floodplain.

This contradicts CDP Rural Interface policies that require **minimisation of visual dominance**.

### 11.5.4 CPTED Risks on Styx River and Basin Edges

Hazard and ecological setbacks push houses back from the river corridor, reducing passive surveillance. The result is:

- intermittent paths with poor sightlines,
- deep vegetated margins,
- low visibility and increased CPTED risk.

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## 11.6 Landscape, Rural Interface, and Visual Effects

### 11.6.1 Basins and Wetlands Are Hazard Infrastructure, Not "Amenity"

Appendix F rebrands mandatory hazard mitigation as aesthetic benefit.
Yet the basins are:

- responses to high groundwater,
- compensatory flood storage,
- vulnerable to salinity,
- likely to degrade in ecological quality under rising water tables.

See also Section **8.1–8.3** which detail the Styx corridor's at-risk wetland systems, which Appendix F incorrectly treats as compatible with urbanisation.

### 11.6.2 Mischaracterisation of Existing Landscape

The report claims the baseline is "urban" due to the golf resort zoning.
In reality, the site is:

- open rural plains,
- low structures,
- distant rural/coastal viewsheds,
- dark skies at night.

Replacing this with an 800-house suburb is a dramatic character shift.

### 11.6.3 Graphics Reveal Greater Effects Than Reported

Appendix F-i images show:

- significant visual exposure from Lower Styx Road,
- no modelling of night lighting,
- no seasonal visual analysis,
- medium-density clusters near visually sensitive edges.

The assessment underrates effects as "low" or "moderate" without robust modelling.

### 11.6.4 Cumulative Effects Ignored

Prestons + Belfast + PC23 collectively erode:

- rural separation,
- landscape identity of the Styx corridor,
- ecological integrity of the floodplain.

There is no cumulative analysis, despite CRPS requirements.

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## 11.7 Transport Integration and Accessibility

### 11.7.1 Lack of Public Transport and Unlikely Future Provision

There are:

- no current bus services,
- no route in the Metroplan pipeline,
- no density or linearity to support future PT.

The applicant's "possible routing" diagrams are speculative and unsupported.

### 11.7.2 Car Trip Generation Understated

The ITA relies on outer-suburban trip rates.
But PC23 is a **rural satellite**, so trip generation is likely significantly higher (10–12 vpd/dwelling).

### 11.7.3 Hazard-Related Access Limitations Ignored

Lower Styx Road frequently floods.
All external access roads lack safe multimodal facilities.
The modelling assumes perfect, uninterrupted accessibility, contrary to actual hazard conditions

### 11.8 Incoherent Urban Design

A consistent theme across Appendices A (Economics), E (Transport), F/F-i (Landscape), and G (Urban Design) is that they do not describe the same environment. Each discipline makes assumptions that are explicitly invalidated by the others. This produces an internally contradictory and therefore methodologically unreliable evidence base.

1. **Economic Assessment of Proposed Rezoning at Whisper Creek (Appendix A) provides for 1500 m2 of retail space**, comparable in scale to a Neighbourhood Centre under the Christchurch District Plan and constitutes the establishment of a new commercial node.yet
    - **The same document characterizes** the impact as "minor", a "small scale of commercial activity", and "dispersed market impact" suggesting that it is of inconsequential concern to the council.
2. **Urban Design (Appendix G) asserts walkability and integration**, yet

- **Transport (Appendix E)** confirms there are *no* safe pedestrian or cycling facilities on any bounding road, *no* PT services, and *no* planned upgrades (ref. Section 10).
  → *The "walkable neighbourhood" claimed in Appendix G cannot exist in the transport environment actually described by the ITA.*

3. **Urban Design claims the rural–urban interface will be softened**, but

   - **Landscape Graphics (Appendix F-i)** show visually exposed medium-density clusters, unmitigated roof planes, and minimal screening.
     → *The "soft edge" claimed in G contradicts the visual reality documented in F-i.*

4. **Economic Appendix A claims the commercial node will be viable and demand-driven**, yet

   - **Transport (Appendix E)** shows the site has no passing trade and is accessible almost entirely by car, and

   - **Urban Design (Appendix G)** provides no walkable catchment to external anchors.
     → *The economic assumptions rely on a walkability and catchment model disproven by both transport and urban design evidence.*

5. **Economic Appendix A states the area is already 'urban' under the golf resort zoning**, yet

   - **Landscape Appendix F** describes a predominantly rural character with open vistas, agricultural landform, and minimal built form.
     → *The "urban baseline" assumption contradicts the landscape and planning reality.*

6. **Appendix G asserts strong ecological and riparian integration**, yet

   - **Appendix F** acknowledges the Styx margins require extensive buffers, setbacks, and no-passive-surveillance conditions.
     → *Urban design claims of activation contradict ecological constraints requiring disengagement.*

These contradictions make the applicant's urban design case structurally unsound: the proposal cannot simultaneously be walkable, car-dependent, integrated, isolated, rural-edge-softened, visually contained, and economically viable. The evidence cannot all be true at once.

## 11.8 Synthesis and Conclusion

PC23 does **not** achieve a well-functioning urban environment as required by NPS-UD, CRPS, and the CDP.
The proposal:

- establishes a **peripheral**, **car-dependent**, and **non-contiguous** satellite suburb;
- introduces a **weak, non-viable commercial node** that undermines the centres hierarchy;
- relies on landscape "mitigation" that is in reality hazard management;
- produces significant adverse transport, landscape, and character effects;
- contradicts the strategic spatial logic of Christchurch's planned urban form;
- fails to provide the social infrastructure required for resilient communities;
- provides no credible pathway to multimodal transport or reduced emissions;
- assumes future infrastructure capacity that does not exist or is unfunded.

Accordingly:

> **PC23 is inconsistent with the NPS-UD, CRPS Chapter 6, and the Christchurch District Plan. It does not represent efficient, resilient, or well-integrated urban development and should be declined.**

# 12. Insurability and Long-Term Financial Exposure

12.1 Introduction: Why Insurability is a Planning Matter
New Zealand's residential insurance market has shifted decisively toward hazard-based, address-specific risk pricing. High groundwater, liquefaction susceptibility, flood-plain exposure, and coastal-inundation pathways—all features present at the PC23 site—are now directly used by insurers to set premiums, impose large excesses, restrict coverage, or withdraw entirely. Loss of insurability affects homeowner resilience, mortgage availability, market value, and Council obligations under the RMA to avoid or mitigate natural-hazard risk.

### 12.2 Historical Precedent for Insurance-Driven Property Devaluation

Beyond the Canterbury earthquake sequence, several documented New Zealand cases show that insurance repricing in hazard-prone areas has driven down property values:

• South Dunedin: flooding and high groundwater led to higher premiums and restrictive terms; insurers publicly warned of future uninsurable zones.
• Napier: post-flooding insurance restrictions led to price stagnation and discounts.
• Wellington: insurers introduced higher premiums and declined new business in landslide- and liquefaction-prone suburbs.
• Nelson–Tasman: severe premium escalation followed the 2022 floods, reducing values in affected subcatchments.

### 12.3 Published Authorities Signalling Insurability Risk in Environments Like PC23

Several national authorities warn that areas with the same hazard profile as PC23 face heightened risk of insurance retreat:

• IAG (Climate Change Position Statements 2018–2022): warns that low-lying coastal floodplains and liquefaction-prone areas may become uninsurable by 2050.
• Reserve Bank of New Zealand (Climate Risk Insights Report 2022): notes that insurance withdrawal is a foreseeable financial hazard that can precede physical climate impacts.
• Deep South National Science Challenge (2019–2023): documents that rising groundwater and liquefaction amplification will drive "gradual insurance retreat" via higher excesses, premium escalation, and exclusions.
• NZ SeaRise (2022): reveals local subsidence in northern Christchurch, increasing effective sea-level rise beyond CCC's planning assumptions, worsening insurability.
• EQC/Toka Tū Ake (2021–2024): emphasises that private insurers may withdraw from high-hazard areas, regardless of EQC cap increases.

### 12.4 Why PC23 Presents a Perfect Storm of Insurance Risk

The PC23 site includes nearly every factor insurers classify as high-risk:

• High groundwater and future water-table rise.
• Tidal-influenced floodplain with extremely low fall gradients (1/6000 in Spencer Drain).
• Liquefaction-susceptible soils, dune sands, and overbank deposits.
• Free-face conditions at riverbanks and proposed stormwater lakes, enabling lateral spread.
• Proximity to tsunami-inundation pathways, with NZ SeaRise data indicating that the Orange Zone is likely to shift inland over the development footprint.
• Need for extensive filling within a flood-storage area, increasing long-term settlement and flood displacement.

### 12.5 Likely Insurance Outcomes for PC23 if Developed

Based on insurer practice since 2011:

• Significantly higher annual premiums compared with Christchurch averages.
• Large flood and liquefaction excesses.
• Special insurance terms (restricted cover, exclusions).
• Potential refusal to offer new policies in the lower terrace.
• Mortgage constraints as banks require full replacement insurance.
• Depressed long-term property values and reduced market liquidity.

### 12.6 Planning Implications Under the RMA and CRPS

Under s6(h) and s31 RMA, decision-makers must avoid or mitigate significant natural-hazard risks. Approving a development where insurability is foreseeably compromised conflicts with:
• NPS-UD Policy 1 (well-functioning urban environments),
• CRPS 6.3.3 and 6.3.4 (avoidance of hazard exposure),
• MfE Coastal Hazards Guidance (2022),
• CCC's climate-adaptation obligations.

## 13. Additional Substantive Issues Identified for Further Development

### 13.1 School Safety and Local Traffic Effects

Increased vehicle movements associated with PC23 will materially affect the safety environment at Ōhuruhi Model School on Turners road, where rural road conditions, lack of footpaths, and limited sight lines already present elevated risk. Tradies habitually assume the rural road allows 80km speed and travel around a blind curve into a congested area where extremely young children are crossing the narrow road.

### 13.2 Construction-Phase Noise, Vibration, Dust, and Haulage Effects

A multi-year construction programme has the potential to generate significant amenity, health, and ecological impacts on neighbouring communities and reserves, none of which have been evaluated.

### 13.3 Transport Emissions and Vehicle-Kilometres Travelled (VKT)

The proposed development is highly car-dependent and is likely to increase VKT substantially, contrary to CCC's Climate Resilience Strategy and relevant CDP Strategic Directions.

### 13.4 Firefighting Water Supply and Emergency Response Times

The site's peripheral location, combined with reliance on private water-supply infrastructure and constrained access routes, raises unresolved concerns regarding fire-flow capacity and emergency-service response times.

### 13.5 Groundwater Interference with Existing Domestic and Stockwater Wells

Additional groundwater abstraction may cause interference effects on neighbouring wells in Ouruhia and Spencerville; this risk has not been assessed.

### 13.6 Spencer Drain Capacity, Maintenance Requirements, and Ecological Sensitivity

The proposal does not address the capacity limitations, sedimentation vulnerability, or maintenance implications for Spencer Drain, a slow-velocity and ecologically sensitive receiving environment.

### 13.7 Historic Soil Contamination and Mobilisation Risks

Legacy agrichemicals and nitrate residues associated with long-term dairy and rural land use may be remobilised by earthworks, fill placement, and groundwater-rise dynamics.

### 13.8 Bird-Movement Patterns, Wetland Interfaces, and Low-Flight Operations

Urbanisation at this location may alter avian movement patterns between the Styx River corridor and Bottle Lake Forest, with potential implications for helicopter operations used in fire management.

### 13.9 Recreational Carrying Capacity of the Pūharakekenui/Styx Corridor

The expected increase in local population will place additional pressure on the Styx Vision 2000–2040 restoration network, including paths, riparian margins, and biodiversity values, without corresponding capacity or mitigation planning.

## 14. Relief Sought

This section sets out the relief sought in relation to Private Plan Change 23 (Whisper Creek). The requested relief is grounded in the technical evidence, policy analysis, and statutory requirements outlined in the preceding sections. Although this submission supports responsible, well-integrated, and resilient housing development, the evidence demonstrates that PC23 does not meet the standards required under the RMA, national direction, the CRPS, or the Christchurch District Plan, nor does it satisfy the Council's obligations under Te Tiriti o Waitangi or the partnership and kaitiakitanga responsibilities owed to Te Ngāi

Tūāhuriri Rūnanga as mana whenua.
Key elements of the proposal were never presented to Te Ngāi Tūāhuriri for informed consideration, and the assessment now required under the Mahaanui Iwi Management Plan, the Ngāi Tahu Subdivision and Development Guidelines, and Te Mana o te Wai remains incomplete.
The relief sought therefore reflects not only the unresolved technical and environmental risks, but also the procedural and cultural obligations that must be met before any rezoning decision is contemplated.

### 14.1 Primary Relief Sought – Decline Private Plan Change 23

Given the significant deficiencies relating to:
• natural hazards and climate-change risk,
• transport safety and tsunami evacuation,
• Three Waters capacity and long-term resilience,
• stormwater and floodplain performance,
• ecological and freshwater protection,
• cultural and archaeological values,
• emissions and urban-design consistency,
• funding and economic feasibility, and
• non-compliance with MDRS, QMs, and Clause 25(4A),

the primary relief sought is that **Christchurch City Council decline Private Plan Change 23 in its entirety**.

### 14.2 Alternative Relief – Defer or Suspend PC23 Pending Essential Information

If the Council determines that declining PC23 outright is not appropriate at this stage, the alternative relief sought is that the Council:
• defer or suspend consideration of PC23,
• require the applicant to complete, prior to any further processing of PC23, all outstanding hazard, transport, and infrastructure assessments, including: updated hydrodynamic flood-modelling; groundwater–SLR modelling; quantitative tidal-closure and backflow modelling for the Styx catchment; full liquefaction and settlement analysis in accordance with NZGS 2021 guidance; flood-storage displacement modelling for all proposed filling; updated *transport network modelling* for all affected corridors and intersections (including Marshland–Lower Styx–Spencerville Road and Chaney's Corner); and a full *traffic-safety assessment* including a KiwiRail Level Crossing Safety Impact Assessment for the Spencerville Road railway crossing and a Stage 1–2 Road Safety Audit of all site accesses and receiving roads, together with updated tsunami-evacuation travel-time modelling to NZTA standards.

• require independent peer review of all new technical information, and
• re-evaluate PC23 only once a complete and up-to-date evidence base is available.

This approach is consistent with MfE (2022) *Coastal Hazards and Climate Change Guidance*; NZSeaRise (2022) regional projections; the precautionary principle in s6(h) RMA; the Natural Hazards Chapter of the Christchurch District Plan; CRPS Policies 11.3.1–11.3.3 requiring avoidance of increased hazard risk; NZGS (2021) geotechnical guidelines; NPS-FM (2020) and NES-Freshwater requirements for hydrological and water-quality assessments; the Canterbury Land and Water Regional Plan; Waka Kotahi's Integrated Transport Assessment and Road Safety Audit Guidelines; KiwiRail's Level Crossing Safety Impact Assessment framework; and the information obligations under Schedule 4 and s32 RMA.

### 14.3 Site-Specific Relief – Conservation Zoning for the Lower Terrace

If the Council considers that some form of rezoning may still be appropriate after further assessment, the relief sought is that:
• the lower terrace (HFHMA and ponding areas) be rezoned **Conservation**,
• ecological restoration be prioritised within this area,
• riparian corridors be widened to a minimum of 20 m,
• stormwater basins be relocated outside of high-flood-hazard areas, and
• public access and habitat enhancement be integrated into long-term management.

This approach aligns with:
• CRPS biodiversity and ecological-network policies,
• NPS-FM (Te Mana o Te Wai),
• CDP ecology and riparian policies,
• CCC's Styx Vision 2000–2040.

### 14.4 Relief Regarding MDRS, QMs, and s77L Obligations

The submission seeks that Council require the applicant to:
• map all relevant Qualifying Matters spatially,
• complete a full s77L evaluation of alternative development forms,
• demonstrate the "least modification necessary" to MDRS,
• incorporate hazard and infrastructure constraints transparently into rezoning boundaries.

Without these steps, PC23 cannot be lawfully accepted or approved.

### 14.5 Relief Regarding Cultural and Archaeological Assessment

The submission seeks that Council require:
• an updated Cultural Impact Assessment prepared in partnership with Ngāi Tūāhuriri,
• a mahinga kai assessment consistent with Te Mana o Te Wai,

• a full archaeological desktop assessment and walkover survey,
• identification and protection of wāhi tūpuna and wāhi tapu.

### 14.6 Relief Regarding Infrastructure Funding and Long-Term Costs

The submission requests that Council require:
• a full infrastructure funding plan,
• identification of all unfunded or partially funded upgrades,
• analysis of who bears the long-term operational costs,
• confirmation that ratepayers will not be burdened by private development.

### 14.7 Relief Regarding Insurability

• Decline PC23 unless the applicant provides full, peer-reviewed insurability modelling demonstrating long-term insurance viability.
• Require evaluation of premium escalation, insurance retreat scenarios, and mortgage impacts across a 100-year planning horizon.
• Require an insurer-issued assurance that full replacement insurance will remain available for PC23 homes.
Without robust evidence, rezoning would expose 800 households to foreseeable financial and insurability risk.

### 14.8 Requirement for a Retail Distribution Effects Assessment

Given that the zoning provisions (see PC23-Appendix-A) enable up to 1,500 $m^2$ of food-and-beverage and retail floorspace — a scale comparable to a Neighbourhood Centre under the Christchurch District Plan — the proposal effectively establishes a new commercial node outside the planned centres hierarchy.

Under RMA effects-based planning, City planners must assume "full development potential," not hypothetical intentions. They must assess the maximum development that the zoning provisions enable.

They are not allowed to rely on: "likely" development, verbal assurances, informal design rationales. Thus, the relevant scale is 1,500 $m^2$, not the claim of "3–4 small shops."

Under the CRPS centres-based framework and District Plan commercial policies, any new centre of this scale requires a specialist Retail Distribution Effects Assessment (RDEA) to determine whether it would undermine the role and function of the Prestons, Belfast, or other centres, alter travel behaviour, or create an out-of-sequence commercial pattern.

No such assessment has been provided. The relief sought is therefore that Council require a full RDEA prior to determining PC23, and that PC23 not proceed until this assessment has

been completed, independently peer-reviewed, and shown to be consistent with regional and district policy.

### 14.9 Remedies Relating to Contamination, Public Health, and Soil/Groundwater Quality

• **Full Preliminary Site Investigation (PSI) and Detailed Site Investigation (DSI):** Require the applicant to undertake a comprehensive PSI and DSI in accordance with the NES-CS, covering all former agricultural areas, fill areas, soil and groundwater sampling, and identification of any contamination hotspots. No rezoning should occur until CCC has independently peer-reviewed and accepted the DSI.

• **Remediation Action Plan (RAP) and Long-Term Management Plan (LMP):** If contamination is confirmed, require a RAP specifying remediation methods, disposal pathways, verification testing, and a long-term management plan for any residual contamination.

• **Groundwater-Rise and Salinity-Intrusion Assessment:** Require quantitative modelling of groundwater rise under NZSeaRise 2022 SLR projections, saltwater intrusion risks, and effects on foundation performance, stormwater basins, and contaminant mobilisation.

• **Assessment of Fill Quality, Source, and Contaminant Risks:** Require full certification and testing of all imported fill, analysis of contaminant leaching potential, and assessment of fill behaviour in high-water-table floodplain conditions.

• **Public-Health Risk Assessment:** Require assessment of dust, particulates, groundwater contamination risks to neighbouring bores, and exposure pathways for nearby residents during earthworks.

• **Regional Consenting Feasibility (LWRP and NES-FM):** Require evidence that all required regional consents—including stormwater discharge, wetland modification, groundwater take, and earthworks—are realistically obtainable under the LWRP and NES-Freshwater.

• **Deferred Consideration of PC23 Until Evidence Is Complete:** If the applicant cannot provide the required investigations, CCC should decline, suspend, or return PC23 under Clause 23(5) due to insufficient information.

### 14.10 Relief Regarding Cultural Assessment and Engagement with Te Ngāi Tūāhuriri Rūnanga

Given the evidence set out in Section 9—namely, that Te Ngāi Tūāhuriri Rūnanga were briefed only on a materially different proposal in 2021, at a time when the extent, density,

hydrological impacts, hazard exposure, and cultural-landscape implications of PC23 were neither disclosed nor understood—the following relief is respectfully sought:

• require the applicant to re-engage appropriately and transparently with Te Ngāi Tūāhuriri Rūnanga as mana whenua, providing full and accurate information about the scale and nature of the current proposal, its hydrological and ecological effects, and its potential impacts on wāhi taonga, mahinga kai, Ngā Wai (the Pūharakekenui/Styx River), and the wider cultural landscape.

• require the preparation of a full, independent, mana-whenua-led Cultural Impact Assessment (CIA), commissioned through the appropriate rūnanga processes, consistent with the Mahaanui Iwi Management Plan (2013), the Ngāi Tahu Subdivision and Development Guidelines, and the tikanga-based assessment frameworks applied by Te Ngāi Tūāhuriri.

• suspend further consideration of PC23 until Te Ngāi Tūāhuriri Rūnanga have been given a fair, informed, and adequately resourced opportunity to assess the actual proposal now before the Council, and to determine whether a CIA is required and what the scope of that CIA must be.

• recognise, in accordance with Te Mana o te Wai and CRPS Policies 2.2.1, 2.2.2, and 2.2.4, that mana whenua must be provided the opportunity to make a fully informed assessment of potential effects prior to land-use decisions that may alter the cultural, hydrological, and ecological integrity of the Pūharakekenui/Styx catchment.

• ensure that any future planning, assessment, or decision-making arising from PC23 gives effect to the principles of Te Tiriti o Waitangi, including partnership, active protection, informed decision-making, and recognition of mana, rangatiratanga, and kaitiakitanga.

### 14.11 Relief Regarding Procedural and Statutory Deficiencies

PC23 should be declined, or at minimum suspended, due to unresolved procedural defects that prevent lawful acceptance or notification. Specifically:
(a) The Section 32 evaluation does not assess reasonable alternatives as required by s32(1)(b)(i).
(b) The plan change has not demonstrated consistency with the Canterbury Land and Water Regional Plan, contrary to s75(4)(b).
(c) Mandatory spatial information for Qualifying Matters and hazard overlays has not been provided as required under Schedule 1.
(d) The Outline Development Plan is incomplete and not in a form capable of insertion into Chapter 8.
(e) No strategic infrastructure assessment has been supplied, contrary to NPS-UD and CRPS

6.3.5.
(f) No updated cultural assessment has been undertaken for a proposal of this scale and effect on Ngā Wai and mahinga kai.
(g) The Integrated Transport Assessment does not meet the CDP requirements for a PPC and provides insufficient information under Clause 23.
(h) No climate-change adaptation evaluation has been provided under s6(h), s7(i), or MfE 2022 guidance.
These unresolved procedural matters provide independent grounds for declining or deferring PC23.

### 14.12 Relief Sought Regarding Further Expert Assessment

Should CCC proceed beyond the Clause 25 stage, the submitters seek that any further processing of PC23 be contingent on the applicant providing comprehensive, independently peer-reviewed assessments addressing the following matters:

(a) A school-safety and active-transport assessment for Ōhuruhi Model School.
(b) A construction-phase effects management plan covering noise, vibration, dust, and truck routes.
(c) A transport-emissions and VKT analysis consistent with CCC's Climate Resilience Strategy.
(d) A firefighting water-supply and emergency-response assessment meeting Code of Practice standards.
(e) A groundwater-interference assessment for neighbouring domestic and stockwater bores.
(f) A full hydrological and ecological assessment of Spencer Drain capacity and maintenance implications.
(g) A historic-contamination investigation including nitrate and legacy agrichemicals.
(h) An assessment of bird-movement and air-operations risks in relation to the Styx and Bottle Lake corridors.
(i) A recreational carrying-capacity assessment for the Styx Restoration Project network.

If these assessments cannot demonstrate that adverse effects will be avoided or reduced to an acceptable level, the plan change should be declined.

### 14.13 Scope of Relief Sought

For the avoidance of doubt, this submission seeks any combination of the following outcomes:
• decline the plan change;
• defer pending complete evidence;
• rezone hazard-prone areas as Conservation;

• impose more stringent development controls;
• require additional assessments consistent with national and regional policy.

### 14.14 Conclusion- Relief Sought

PC23 presents significant unresolved risks and systemic deficiencies across hazards, infrastructure, ecology, cultural values, and statutory compliance. The relief sought reflects the necessity of ensuring resilient, evidence-based, and community-safe planning outcomes. Until the applicant provides a complete, robust evidence base demonstrating that these risks can be safely managed, the plan change should not proceed.

## 15. Appendices & Supporting Materials

This section identifies recommended appendices and supporting materials that may accompany the Technical Submission for PC23. These appendices do not need to be finalised at submission time, but establishing their structure now ensures the submission can expand without raising new issues at later stages of the Schedule 1 process.

### 15.1 Purpose of Appendices

The appendices are intended to:
• Provide clarity and transparency regarding technical evidence
• Allow independent verification of data and policy references
• Supply maps, diagrams, and tables that support the submission text
• Ensure consistent cross-referencing for the hearing and any subsequent appeals
• Document the basis for relief sought

### 15.2 Recommended Appendix Structure

The following appendices are recommended for inclusion:

Appendix A – Hazard and Floodplain Mapping
• CCC Flood Hazard Maps (HFHMA, FMA, ponding areas)
• Styx floodplain context and elevation models
• Tsunami evacuation zone mapping
• NZSeaRise (2022) subsidence and SLR projections

Appendix B – Groundwater and Geotechnical Information
• Groundwater elevation summaries
• LiDAR elevation profiles of the lower terrace
• Extracts from NZGS Modules 1–5 relevant to liquefaction and lateral spread
• Site soil descriptions and inferred geomorphology

Appendix C – Stormwater and Hydraulic Constraints
• Spencer Drain gradient diagram (~1:6000)
• Styx tidal-gate operation schematic
• Ponding and conveyance pathway map
• CCC RFI excerpts on basin sizing errors

Appendix D – Three Waters Infrastructure
• PS78 pump station information (capacity, earthquake impacts)
• CCJ wastewater modelling extracts
• Known pipe deformation/I&I areas
• Potable water supply constraints documentation

Appendix E – Transport and Evacuation Modelling Inputs
• Annotated maps of Turners, Spencerville, and Kainga Roads
• One-lane bridge geometry diagrams
• Intersection constraints at Chaney's Corner
• Evacuation travel-time assumptions and bottleneck locations

Appendix F – Ecological and Te Mana o Te Wai Material
• Excerpts from Boffa Miskell (2023) Styx Catchment Report
• Maps of seasonal wetlands and riparian vegetation
• Species lists for Styx corridor (tuna, īnanga, birds, lizards)
• Te Mana o Te Wai values hierarchy summary

Appendix G – Cultural & Archaeological Resources
• CIA excerpts and identified gaps
• Heritage New Zealand Pouhere Taonga Act summary
• Known archaeological records near Styx/Brooklands Lagoon
• Recommended accidental discovery protocol

Appendix H – NES-CS and Public Health Material
• Soil contamination risk summary
• Potential pesticide/heavy-metal contaminant profiles
• Groundwater salinity intrusion risk notes
• Dust and air-quality considerations

Appendix I – Economic Feasibility and s32 Analysis
• Infrastructure cost comparison tables
• Funding gap analysis
• Summary of unbudgeted upgrades in the CCC Long-Term Plan
• Alternative development forms and sequencing options

## Appendix J – Insurability Risk, Insurance-Market Behaviour, and Financial Exposure

### J.1 National Insurance-Market Behaviour Since 2011

• Insurers have shifted from uniform regional pricing to address-specific natural-hazard pricing.
• Premiums, excesses, exclusions, and refusals of cover now directly reflect liquefaction susceptibility, groundwater levels, floodplain behaviour, and coastal-inundation exposure.
• Insurance retreat typically begins gradually—via premium escalation and restrictive terms—before outright withdrawal.

### J.2 Documented Precedents of Insurance-Driven Property-Value Decline

• South Dunedin (2015–2024): High groundwater and recurrent flooding led to premium escalation and suppressed property values.
• Napier (2020–2023): Post-flood insurance restrictions generated measurable stagnation and value divergence.
• Wellington (2019–2024): Premiums surged and some insurers declined new business in liquefaction- and landslip-prone suburbs.
• Nelson–Tasman (2022–2023): Severe premium escalation following major floods reduced marketability in affected subcatchments.

### J.3 Authoritative Risk Signals Relevant to PC23

• IAG Climate Change Statements (2018–2022): Low-lying floodplains and liquefaction-susceptible soils are potential "future uninsurable zones."
• Reserve Bank of NZ Climate Risk Insights (2022): Insurance retreat is a foreseeable financial hazard with direct impacts on property values.
• Deep South National Science Challenge (2019–2023): Rising groundwater amplifies liquefaction risk and increases likelihood of insurance withdrawal.
• NZ SeaRise (2022): Local subsidence in northern Christchurch increases effective sea-level rise beyond CCC planning assumptions, degrading insurability.
• EQC / Toka Tū Ake (2021–2024): Notes that private insurers may withdraw from high-hazard areas regardless of EQC cap increases.

### J.4 PC23 Site Factors Consistent with High Insurability Risk

• High current groundwater and projected future rise.
• Liquefaction-susceptible dune sands and overbank silts; shallow water table.
• Free-face conditions at Styx River banks and proposed lakes enabling lateral spread.
• Extremely low-gradient flood-conveyance (Spencer Drain approx. 1/6000).
• Development footprint adjacent to tsunami-inundation pathways; Orange Zone expected to shift inland.
• Extensive fill required to meet minimum FFL → long-term differential-settlement risk.
• Combined hazard environment consistent with insurer high-risk categories.

J.5 Foreseeable Insurance Outcomes if PC23 Proceeds
• Premiums materially higher than Christchurch averages.
• Large flood and liquefaction excesses and restrictive special terms.
• Potential refusal of new policies in groundwater-affected zones.
• Mortgage constraints due to inability to secure full replacement insurance.
• Depressed long-term asset values and impaired resale liquidity.

J.6 Planning Significance
• Loss of insurability is a foreseeable natural-hazard effect under s6(h) and s31 RMA.
• Failure to assess insurability conflicts with:
– NPS-UD Policy 1 (well-functioning urban environments)
– CRPS 6.3.3 and 6.3.4 (avoid significant hazard exposure)
– MfE Coastal Hazards Guidance (2022)
• Insurance-market evidence signals unacceptably high long-term financial risk for 800 households.

J.7 Relief Sought
• Require full, peer-reviewed insurability modelling incorporating groundwater-rise, liquefaction, lateral-spread, and flood-displacement effects through 2120.
• Require insurer-issued statements confirming likelihood of long-term availability of full replacement cover.
• Decline PC23 unless long-term insurability is robustly demonstrated.

### 15.3 Cross-Reference Table (Optional)

A cross-reference table may be included to help the hearing panel navigate the relationship between:
• submission sections,
• appendices,
• statutory policies, and
• RFI responses.

### 15.4 Future Evidence and Expert Inputs

This section confirms that further material may be added to the appendices as it becomes available, including:
• updated Styx flood modelling by CCC,
• additional ecological assessments,
• cultural and archaeological studies,
• expert evidence relating to hazards, stormwater, or planning law.

### 15.5 Conclusion- supplemental information placeholder section

The appendices are designed to support clarity, reinforce the technical basis of the

submission, and ensure that all evidence can be efficiently presented during the hearing and any subsequent Environment Court appeal. These materials strengthen the submission's alignment with statutory, ecological, cultural, and infrastructure requirements.