

SUBMISSION IN RESPECT OF PRIVATE PLAN CHANGE 31 PROPOSED BY ROLLESTON INDUSTRIAL DEVELOPMENTS

Prepared by C E Docherty of 336B & 336C Whites Rd, Ohoka.

UPDATED 07/08/23

These are the changes to the district plan that I do not agree with

I am objecting to the following changes to our district plan.

Definitions : Education facilities added.

30 : Utilities and Traffic Management - Rules 30.1.1.9

30.6.1.1 Access to roads

30.1.1.9 Roads complying with 32.1.1.32d

31.1.1.4 Adding 7 and 8 zones to dwelling site compliance.

31.1.1.6 Why taking the brackets out.

31.1.1.10 Structure coverage of the net area of any site shall not exceed

31.1 : Minimum Structure Setback Requirements

31.1.1.24 : Structure Height

31.1.1.35 : Structure Height in Business 4 Zone

31.1.1.39 : Fence Height in Business Zone

31.1.1.53 : Tree Planting

31.2.2 : and 31.2.3 Adding a retirement village and an educational facility

32.1 .1.1: Lot sizes. Changing these by adding residential 3 and residential 8.

32.1.1.11 : residential 4A zone. Changing the average area of allotments from 5000 to 3300 square metres

32.1.1.28 : subdivision to comply with outline plan.

32.3.7 : If subdivision does not comply with above is discretionary to be added.

16.1.1.1 Providing a business zone in Ohoka. We already have one in Mandeville.

16.1.1.12 Provide for retail and business activities in Ohoka.

18.1.1.1.9 deleting " dwellings are within generous settings.".. completely changes the meaning of this objective.

My submission is that I categorically oppose in its entirety PC31 as submitted by Rolleston Industrial Developments Inc.

I am objecting to the subdivision in its entirety for the following reasons:-

1. Unsuitability of the land for housing on the scale and density proposed.
2. The need to preserve excellent farm land for future food production and for our future generations.
3. The flood risk that already exists and will be increased by intensified housing and the proposal to 'enhance' the Ohoka Stream South Branch, (which means increasing its capacity within the proposed subdivision), which flows into our property and which is already at peak capacity.
4. The increased traffic that will be generated from this subdivision.
5. The visual effect the subdivision will have on the view to the mountains across farmland.

6. The proposed widening of surrounding roads, and in particular Whites Road, where there is limited space available.
7. The effect the subdivision may have on our ground water, spring and well.
8. The amenity value of living in a small rural village with large treed blocks surrounding most homes will disappear.
9. The ability to walk my dog and grandchildren down a grassed country quiet road verge will be gone.
10. The farmers market will not cope with the new number of residents.
11. Noise, cats, dogs, rubbish, smoke, use of fireworks, from increased population.
12. Effects on existing businesses in Ohoka, Mandeville and Silverstream.
13. Future effects of climate change.
14. District plan policy 18.1.1.9 "ensuring that any growth and development of Ohoka settlement occurs in a particular manner" which gives special regard to low density living.
15. Undermines all planning and consultation involved in the proposed District Plan.
16. No public transport.
17. Loss of rural character.
18. Loss of our country school.
19. Flooding of 'down hill' properties.
20. Eyesore of multiple tanks.
21. Planting of trees that are not in keeping with the Ohoka area except for shelter belts.
22. Disappearance of land on road for clearing drains, rural mail delivery, riding horses, walking etc.
23. People who have produced 'expert' reports also include disclaimers which state that have not been to site and contain disclaimers.
24. Overwhelming the special character of Ohoka.
25. Loss of rural village destination for whole region.
26. Ratepayers paying for infrastructure costs for the development.
27. Future plans show walking / cycling tracks on my land. This is not possible (a) due to fences, streams with no bridges, etc and (b) for health and safety reasons. (e.g. use of sprays, pest control).
28. Future clear felling the trees on my land and subdividing our land.
29. Reverse sensitivity-activities on our land that could cause complaints from urban residents.
30. Increased light from urban lighting making it impossible to properly see the night sky.
31. Storm water. Where is it to go.
32. Loss of land acting as an aquifer and carbon sink.
33. Destruction of community spirit.
34. Alternative locations are more suitable for urbanisation.
35. Increased insurance cost and inability to get insurance.
36. Water supply. Interference to existing well and stream depletion.

Reasons for My Opposition to PC31

Introduction

We have owned our 8 hectares of land at Ohoka since 2003 and have lived here since 2011. It was our dream to own land on which we could grow our food and to plant trees to improve the environment and provide a habitat for birds, insects, lizards, fish and frogs. In Ohoka we found the quiet tranquil area where we wished to live. We have worked hard for the last nineteen years to achieve this, clearing gorse, improving drainage, installing irrigation and planting hundreds of trees and thousands of shrubs and grasses.

We now have a beautiful park like property teeming with creatures and birds only to find that a developer wants to 'cash in' and proposes that in the future the land will be re-zoned to enable people to walk and cycle through the property. (That the proposed routes are impractical without removing trees and shrubs that we and other neighbours have planted, removing fences and installing bridges as well as being on areas subject to flooding seems to have been 'overlooked' by whoever 'dreamt up' this plan.)

Building 700-900 houses will destroy our environment that we have worked so hard for and will totally destroy Ohoka as a green leafy village. Small sections are not a suitable fit to the character of Ohoka.

The lot sizes of the proposed development do not reflect the lot sizes in Ohoka. A planner should know that a few open fences and tree plantings (many which will not survive), will not disguise the fact that this is a 'carbuncle' of city houses on the side of a large lot sized rural village.

These houses will bring hundreds of noisy polluting cars along with rubbish, dogs and cats. We will see more dead birds on the road. The existing roads will not cope with this increased traffic and will have to be significantly modified, although the width of the Whites Road for example, is such that there is very limited width for any widening, which means the ratepayer will have to fund this work. We will lose the ability to walk down the grass verge with our dog and grandchildren. You will not be able to ride horses down the grass verge. Our country roads will disappear forever and the fabric of our lives in Ohoka will also change forever.

Ohoka is a rural destination for people and families from all over the region. These people come to experience our village atmosphere in the domain. They come for picnics and for the market. This historic village ambience will all disappear with the increased population and vehicles. Our special historic village will be swallowed up and swamped by this overwhelming proposed subdivision.

Flooding

The flood risk that already exists will be exacerbated by the addition of this proposed subdivision. In addition the completely unpredicted effects of climate change as seen around the world make the reliance on historical records for flood predictions worthless. We have experienced significant rainfall events, which are less than those used in the model, which resulted in streams overflowing, paddocks being underwater, roads flooded and land on the east side of Whites Rd being inundated.

Pattle Delamore Partners Limited, (PDP), who have prepared the report on flooding, include the following at the beginning of their report:-

Limitations:

This report has been prepared by Pattle Delamore Partners Limited (PDP) on the basis of information provided by LINZ, Waimakariri District Council and Innovo not directly contracted by PDP for the work. PDP has not independently verified the provided information and has relied upon it being accurate and sufficient for use by PDP in preparing the report. PDP accepts no responsibility for errors or omissions in, or the currency or sufficiency of, the provided information.

This report has been prepared by PDP on the specific instructions of Rolleston Industrial Developments for the limited purposes described in the report. PDP accepts no liability if the report is used for a different purpose or if it is used or relied on by any other person. Any such use or reliance will be solely at their own risk.

In light of this disclaimer it is apparent that before any decision can be made in regard to PPC31 and in particular the flooding issue, an investigation and report on this aspect of the proposal must be carried out by independent consultants who are not acting on the instructions of the applicant.

It is also noted that the one of the authors of this report previously provided evidence in regard to another matter in the Waimakariri District on behalf of Taggart Earthmoving. It would appear that there was an error in the initial modelling which was only corrected after submissions from other parties. The following is an extract from STATEMENT OF EVIDENCE OF BENJAMIN THROSSELL FOR TAGGART EARTHMOVING LIMITED, 19 APRIL 2021.

- 7.16 In early 2021 an inconsistency was discovered in the model which affected the reported and presented results in the September 2020 application.
- 7.17 A misclassification of the manning's n value resulted in two sections of road being incorrectly identified. The impact of this classification was that flood waters were partially deflected and did not follow the preferred flow paths.
- 7.18 Corrected flood maps were produced and provided to Council with the updated manning's n parameter.

Underground streams flow through this proposed site and emerge as springs in various places. We have one major spring on our property (and two smaller springs) and have had no assurances that these will not be affected. Also, it is most unlikely that the flows from these have been included in PDP's model

The PDP 'disclaimer', the matters noted above and our knowledge of flooding that occurs now, gives us no confidence in the modelling and the report on flooding included with the application.

In the past year there have been a succession of significant floods in many different locations around the world and in New Zealand in Auckland and on the East Coast of the North Island. Many of these were unprecedented in scale and have resulted in extensive damage and loss of life. While NIWA have produced a model for New Zealand there is absolutely no guarantee that rainfall depths and intensities will not be exceeded. The following extract from a NIWA article by Professor Matthew Wilson of the University of Canterbury confirms that any model is still uncertain. (Emphasis added.)

<https://niwa.co.nz/natural-hazards/research-projects/m%C4%81-te-haumaru-%C5%8D-te-wai-increasing-flood-resilience-across-aotearoa-0/uncertainty>

Flood risk and other planning practitioners worldwide often use the outputs from flood modelling as part of their decision making. For instance, to determine flood hazard zones, design mitigation measures or assess the potential impacts of climate change on the flood hazard. However, these outputs contain uncertainty, which is not often quantified or characterised, yet can make the decision-making process more challenging and less reliable.

To account for uncertainty, planners may take a precautionary approach, such as adding a freeboard amount to required floor levels in flood zones or designing flood infrastructure such as stopbanks (levees) to a 1% annual exceedance probability (i.e., the 100-year average recurrence interval). However, this approach is questionable in an era of changing risk under climate change. For example, is the freeboard amount used sufficient to prevent serious damage from future floods? Will the area at flood risk increase? Will a current 100-year flood become a 50-year flood in future?

Some of these questions are aleatoric in nature: they will always be present and cannot be reduced. This includes issues such as the internal variability of the climate system, which implies that even if we had complete information about the future climate state, its chaotic nature means our flood risk assessments will still be uncertain. Other uncertainties are epistemic and are deterministic and subjective; the uncertainty contained in a flood risk assessment depends on how good (or bad!) the data are which are used within the analysis. Improving input data accuracy and model representations should, at least theoretically, reduce the inherent uncertainty in the predictions obtained and is something we always aim for.

Yet, even if we use the best possible data and model representations, uncertainty will still result from a complex combination of errors associated with source data, sampling and model representation. These uncertainties "cascade" through the risk assessment system (Figure 1a), reducing our confidence in any individual prediction and leading to variability in predicted depths and extents across multiple predictions which account for these errors. These uncertainties, here represented as variability in predicted depths and flows, further cascade through to the analysis of flood impacts (Figure 1b). Uncertainty in predicted depths and flows combine with errors from data such as those for buildings and infrastructure, and the statistical models used to quantify damage (e.g., via depth-damage curves). The end result is uncertainty in quantified damage for a flood scenario, creating issues for the decision-making processes such as determining whether to invest in improved mitigation measures.

It does not take an expert to understand that climate change can, and is, having a devastating effect in many parts of the world. To suggest that Ohoka, or anywhere for that matter, is immune to the effects of climate change is not tenable. Given the existing issues with flooding in Ohoka there can be no doubt that anything that increases the risk of flooding cannot be tolerated. It is also apparent that models are just that, and cannot and do not account for the extreme random events that are becoming more frequent.

There are mixed views on who should pay for climate change impacts; government, local councils, insurance companies, home owners or a combination of the above. In the Dunedin Longitudinal Study 75% of the respondents wanted local government to zone land so that the risk of flooding is minimised, or preferably eliminated.

What are we doing even considering a subdivision of this scale in an area which is known as being low lying and hence unsuitable for housing, on the scale proposed? Who do property owners sue when they are flooded if this development goes ahead? Rolleston Industrial Developments Ltd, PDP, ? Probably the council and Government. Insurance cost will escalate and in some cases properties will not be able to be covered by insurance at all. We have had our worst year ever for climate related insurance payments \$324,000,000 and are looking at over a billion over five years. Any location exposed to 1 in 100 year flood will lose insurance. Excesses will rise now.

The soil type is a hard clay base over shingle. Rainfall tends to trickle across the top of the clay at surface level and runs into drains that deliver the water to two main streams. These streams are already full to overflowing during significant rainfall events and cannot take any more water without causing problematic flooding for properties in the southeast as far as Silverstream. This flooding is particularly bad at high tide when the streams cannot empty into the Kaiapoi River. **Ben Throssell said that the streams are not tidal- he is wrong. If he had bothered to come out and look at the streams during heavy rain he could see for himself how they back up and flood during high tide. They are an inter-connected system.**

Use of Farmland

This farmland is a great carbon sink and aquifer. It is ideal dairy land and grows wonderful corn in summer which is used for feed. We should be preserving good producing farmland for the future of our nation; for our children and grandchildren. There will be no farmland left if developments such as this are approved to satisfy the perceived, but completely unsustainable need for 'growth'. When will these developments stop - when they reach the Southern Alps? When that happens where will our food come from? The national policy statement NPS has been developed to protect productive farmland and this proposed development on a dairy farm clearly contravenes the guidelines. The spurious and meritless argument that building on this land will protect another block of farmland somewhere else from development is completely without merit. (Presumably someone was paid to state that.) It confirms that the developers are clutching at straws to justify this proposed plan change.

Impact of Increased Population on Ohoka

A huge population increase will affect the little country school of Ohoka. It will have an estimated population increase of 600 pupils which will overwhelm the country nature of the school. What will happen to pet day and planting days in the domain? The country school amenity will completely disappear and it will turn into one of the biggest primary schools in Canterbury, i.e. a city type school. The Ministry of Education have stated that it has no intention of building a new school in Ohoka. Did the applicant contact the Ministry before including a 'school' in their plan? If they intend to build a preschool it will affect an already existing preschool business in Mandeville which is only a short drive away. Parents in our community have made an effort to live here so their children can have a country school experience and this amenity will disappear for them.

Planting

Planting Poplars [populars in PC31], and Macrocarpa trees along Whites Road is a very 'economical' way to 'green' the area. What happened to large high amenity trees like Oaks, Maples, Alders, Ash, Cabbage Trees, Flax, Grasses, Ginko, Totara, Elm, Liquid Amber and Magnolia trees?

Traffic

The vehicle access onto Whites Rd has been reduced to one road which is labelled 'limited access'. This sounds as if only a few cars will be using it but in fact it is one of just two other access and exit roads for the proposed subdivision. Hundreds of cars will be using these. What provisions are being made for passing or turning bays at these access roads? Whites Rd has no shoulder and is too narrow to allow passing on the left.

Traffic with this plan change will increase by a factor of five along Whites Rd which will mean the road will have to be widened to accommodate this number of vehicles. Coupled with this will be the widening of three culverts. The proposed entrance to the development on Whites Rd is opposite our driveway entrance. To widen the road here, if that is actually possible due to the drains on either side of the road, will mean we cannot walk outside our property without walking on the road or walking in a road drain. (The distance between the edges of the drains on either side of the road is 15 metres; the suggested widening of the carriageway to 12 metres leaves inadequate room for a safe shoulder, nor any space for the planting and walkways that RIDL believe will be possible.) Our mail boxes will need to be relocated, but where that will be to is another question and it would appear that power poles may need to be relocated which would put them closer to vegetation. That would increase costs to Mainpower.

Also, there are a large number of property entrances on Whites Rd and entering this busy road will be dangerous and difficult at peak times.

The widening of Mill, Whites and Tram Roads will be a financial burden on the ratepayers. To say that people can cycle into Rangiora shows a lack of experience of the traffic on Lineside Rd. Traffic joining the motorway already is difficult at peak times and exiting the motorway via Tram Rd is downright dangerous. Increased traffic from this proposed subdivision will make the trip to and from Christchurch City slower and more dangerous.

Night Sky

We love to look at the night sky on clear nights. Increased lighting will prevent us from doing this. This part of our lives will disappear.

Community Facilities

Our community, in conjunction with the Waimakariri District Council, has worked extremely hard to create Ohoka Bush, develop the domain planting and build facilities especially for children. We have two tennis courts, a playground, a flying fox and a bike park that will not service an extra approximately 2000 people.

The community was donated the historic Ohoka Gate House building which has been placed in the domain with the intention that it will be utilised by the community. It is being restored at present thanks to donations and the volunteers who have worked on the restoration project. We have an historic hall and the domain building. This new proposed subdivision with retail shops 'across the road' will completely overwhelm this area of Ohoka and the historic buildings. The amenity value of our domain will disappear along with overwhelming our facilities. Are the subdividers going to build playgrounds, tennis courts and bike parks as part of their development ? It would seem not presumably as that would be an expense with no financial return.

Effect on Existing Wells

How will our two wells be effected ? These issues have not been addressed except to say we may be able to connect to their supply. Will this be adequate to support our properties ? Who pays for this ? We have a perfectly good filtered artesian water supply now.

The proposed drilling of wells for a new water supply are all supposition at present. I am concerned about well interference for existing wells, their reliability of supply and the depletion of water in the streams affecting wild life and plants, especially during the summer when the water levels are already low.

The catchment area for water extraction is over subscribed now so how can the drilling of 4-5 new wells extracting water for 700-900 households be acceptable ? I am also concerned that any new Community Drinking Zone or zones will limit activities of neighbouring properties. Eg; wastewater discharge. Is the well water for household use only or is it for gardens too ? Are grey water systems to be used in all houses and buildings and what other water conservation methods will be employed ? Is the water to be stored in tanks on each property; if that is the case these need to be underground to prevent an eyesore of hundreds of tanks. Take a look at Mill Road (Jenkins) subdivision where some properties have four large black tanks squeezed onto each lot. They are ugly, and this was not part of the originally approved plan.

I am concerned about the springs on our property and the effect any interference to the undercurrent will have on them. Will they disappear or will they have even greater flow when it rains. Who has investigated this?

National Policy Guidelines and the District Plan

The developers have not met all of the criteria for building houses under NPS-UD. They have taken a very narrow view of the requirements without taking other matters into consideration.

Ohoka is unique due to its situation, the trees, rural outlook, open spaces, wildlife, low population density, relatively low traffic volumes and local facilities. There is no other historical village in Canterbury similar to Ohoka. We, along with many other residents choose to live in Ohoka because of the high amenity values and the generally peaceful environment that exists here. There is no doubt the addition of 700-900 households to Ohoka will result in a marked deterioration in the amenity values that the residents have worked hard to achieve. To destroy Ohoka, as it is now, would be shortsighted and a disgrace.

The rural outlook on Whites and Bradleys Rd cannot be maintained with the building of 700-900 houses along with business and a retirement village or school area. The developer seeks to rezone 155.9 hectares of rural land to residential 3, 4a and business 4 and create a residential 8 zone.

The district plan **policy 18.1.1.9** states that any growth and development of Ohoka settlement should occur in a particular manner which gives special regard to low density living. This proposed development intends to override this policy. The subdivision of this land will have significant adverse effects on the rural nature of the area, with a decrease in amenity values and the overall way of life that makes Ohoka such a valued place to live or visit.

Environmental conservation has been ignored in this proposed development plan. It will destroy, damage and remove the natural habitat of all the creatures in Ohoka that we have been protecting and preserving- frogs, fish (long fin eels), butterflies, dragonflies, grasshoppers, lizards and birds (bellbirds, fantails, silver eye, ducks, geese, hawks, plover, little owl, pukeko, quail, pheasant, thrush and sparrows, blackbirds and starlings). Increased traffic, cats, dogs, people and pollution will all play its part in damaging the environment that we have worked to establish.

Policy 15.1.1.1 of the district plan. The proposed development does not integrate into the settlement of Ohoka but places a large urban subdivision on the side of a rural settlement. It joins the Mandeville settlement which with the added population turns Ohoka into a large town. A shelter belt between the two cannot disguise the fact that they are in fact joined. This turns Ohoka into a town irrevocably destroying the historical village that exists now.

Policy 15.1.1.2 development should avoid downstream effects on rural water bodies, provide quiet and safe environments and maintain the individual character of the settlement. This proposed development will increase flood water in streams that already overflow onto land and will overwhelm the character of the small quaint Ohoka village

15.1.3 Transport networks that are safe, sustainable, efficient and facilitate connected communities and a choice of travel modes. There is no public transport in Ohoka and any additional people will have to drive to destinations. The park and rides to Christchurch are limited and cycling on open roads is dangerous.

15.1.4.1 urban development (h) protection and enhancement of significant natural, ecological, landscape, cultural and historic heritage features. Ohoka is a rural settlement that will be overwhelmed by 700-900 houses. The natural rural views from Whites and Bradleys Roads will disappear. A set back of 20 metres, open fencing and a struggling planted area will not disguise this development for what it is - city like.

18.1.1.9 Ensure that any growth and development of Ohoka settlement occurs in a manner that maintains the rural village character of low density living on generous settings. Achieves a consolidated urban form centred around and close to existing settlement. Allows opportunities for a rural outlook. Avoids significant flood hazards. Recognises the low lying nature of the area and ensures that any residential development occurring in Ohoka settlement does not increase the flood risk within Ohoka and adjoining areas.

27.1.1.27 dwelling houses shall have a minimum floor level of 300mm above the 0.5% annual exceedance probability flood event. This means that houses will be 500mm above ground level. Consider truck movements, noise, dust and displacement of water downhill.

Does this mean that the developers will be raising all of the land too. What effect will this have on neighbouring properties?

Notes on Mr Dave Compton-Moen's Plan.

33.7

Griselinia, pittosporum and podocarps die in the cold wet clay, high water table of winter. It is a challenging area to grow natives, except for flax. (The proposed development site was a swamp which grew flax.) It is difficult to get trees to grow on this land and many will die from cold wet flooded feet in winter and concrete hard dry clay in summer. They need to be protected from wind and irrigated in summer. Are the developers providing irrigation to the planted areas ?

I have had many trees die during our twenty years on our land. Some of them were ten to fifteen years old. Who will replace and replant the vegetated areas proposed in the subdivision ?

41

Mr Compton -Moen says the magnitude of the change with the development is low. How can this be when you are doubling the population, building shops, car parks and joining to Mandeville ? You are turning a small rural village into a town. This is simply not plausible.

43

Assessment of native tree species on the site showed no natives. Why is this? Because they do not grow on this soil. Why was an assessment not done of the trees in Ohoka. If you want a development to fit in to the existing vegetation shouldn't this be carried out ?

47.11

If you fly over Ohoka you can see the development across the Canterbury Plains. It is wall to wall subdivisions and development. When will it stop? When we reach the mountains? We must preserve every farm for future food security for our children and grandchildren.

The lot sizes of the proposed development do not match those already existing in Ohoka Village. The subdivision will look like a city subdivision plugged onto the side of Ohoka. The illustrative master plan only shows green spaces and trees. Where are the houses? It looks so pretty without them. Why not keep it that way ?