

31/08/2022

Waimakariri District Council
Private Bag 1005
Rangiora 7440

Tēnā koutou

Submission on Variation 1: Housing Intensification (Medium Density Residential Standards)

Thank you for the opportunity to submit on Variation 1: Housing Intensification (Medium Density Residential Standards). This submission has been compiled by Te Mana Ora on behalf of the National Public Health Service and Te Whatu Ora Waitaha. Te Mana Ora recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora Act 2022 and the Health Act 1956.

This submission is in reference to the document titled “Section 32 Report Variation 1: Housing Intensification (Medium Density Residential Standards) prepared for the Proposed Waimakariri District Plan” (August 2022).

This submission sets out particular matters of interest and concern to Te Mana Ora on behalf of the National Public Health Service and Te Whatu Ora Waitaha, particularly in relation to:

- Natural Hazard- Flooding Risk
- Provision of adequate infrastructure

We agree the Proposed Plan identifies issues that may arise from the proposed changes and that they will need to be addressed in future planning and consent processes.

Specific Comments

Te Mana Ora supports the Qualifying Matters identified in the Section 32 Report Variation 1: Housing Intensification (Medium Density Residential Standards) prepared for the Proposed Waimakariri District Plan (August 2022). Some considerations and recommendations are outlined below.

Hazards and risks- Natural Hazards

Te Mana Ora recognizes and agrees with the information presented in 8.3 Hazards and risks – Natural Hazards (Qualifying matter natural hazards).

Te Mana Ora notes the Waimakariri District Council is aware that parts of the Waimakariri District are subject to natural hazards, particularly freshwater flooding and sea water inundation. The Council is also aware that increased development density in areas subject

to significant natural hazards put people and property at increased risk and is exacerbated by increased run-off and displacement of floodwaters.

Kaiapoi- Flooding Risk

Introducing Medium Density Residential Standards (MDRS) to low-lying areas of Kaiapoi is of concern to Te Mana Ora. The particular areas of concern are those identified in *Figure 2. Qualifying Matter Natural Hazards (MDRS Exclusion)* pg. 39 and *Figure 1 Appendix 1 – Network Planning MEMO – MDRS Exclusion Zone Kaiapoi*.

Te Mana Ora is concerned that the high flooding risk areas identified (above) appear to remain included within the proposed MDRS zones as per Appendix 3 – Variations to the PDP Planning Maps – Proposed Zones. Te Mana Ora recommends that all areas identified as having significant flooding risk are clearly exempted from the proposed MDRS zones.

Te Mana Ora commends the Waimakariri District Council's acknowledgement to mitigate flood risk, however, believes the use of minimum floor levels is not sufficient as a primary flood risk reduction strategy. Minimum floor levels may help to protect newly built properties but does little to reduce the risk of flooding in the identified high-risk areas. Minimum floor levels also fail to consider the pre-existing properties situated in flood risk areas, and the increased run-off and displacement of floodwaters from housing intensification. Te Mana Ora recommends that greater consideration is given to the impact that medium and high-density development could have on pre-existing dwellings in and around the proposed MDRS zones.

Kaiapoi- Wastewater and drainage infrastructure


The Waimakariri District Council recognises existing infrastructure constraints, particularly the wastewater and drainage networks in areas of Kaiapoi as outlined in section 8.3.1 and section 8.3.4. The current system is reported to have significant reliance on mechanical pumping, with limited redundancy to protect people and property in major flood events. This is of public health concern to Te Mana Ora.

It has been discussed (above) that introducing MDRS zones to high flood risk areas will further exacerbate the flooding risk. The Proposed Plan recognises the limitations of the wastewater and drainage infrastructure but does not clearly state methods to improve or prepare for increased capacity of infrastructure or redundancy in flood events.

Te Mana Ora strongly recommends further assessment of the wastewater and drainage infrastructure is undertaken and further investment and improvements are planned for as a part of the Proposed Plan. It is also recommended that the review of the wastewater infrastructure and drainage network take into consideration population projections, likely to increase with the proposed MDRS zones in Kaiapoi.

Final Comments

Te Mana Ora commends the Waimakariri District Council for recognising the flooding risk in areas of Kaiapoi, and for including mitigation measures in the form of minimum floor levels for new properties. However, Te Mana Ora believes more can be done in terms of increasing the capacity of wastewater infrastructure and drainage networks to help protect people and property from harm.



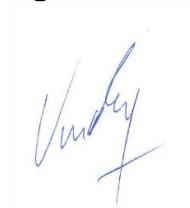
Conclusion

Te Mana Ora does not wish to be heard in support of this submission

If others make a similar submission, the submitter will not consider presenting a joint case with them.

Thank-you for the opportunity to submit.

Ngā mihi,



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