
Submission on Waimakariri District Council - Proposed District Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Waimakariri District Council - Development Planning Unit

Date received: 25/11/2021

Submission Reference Number #:109

This is a submission on the following proposed plan (the **proposal**): Waimakariri District Council - Proposed District Plan

Address for service:

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I wish to be heard: Yes

I am willing to present a joint case: Yes

Could you gain an advantage in trade competition in making this submission?

- **No**

Are you 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

- **Yes**

Submission points

Point 109.1

Section: NER - North East Rangiora

Sub-section: Appendix

Provision:

DEV-NER-APP1 - North East Rangiora Outline Development Plan

Sentiment: Oppose

Submission:

Submission

We have a number of concerns about this section as detailed below: I have entered these here because we were unable to use the submissions section directly in the plan.

Firstly, we feel that we are disproportionately disadvantaged by the section "A green link sleeves both sides of the flow paths, to enable high amenity planting and community value through walking and cycling paths. Appropriate waterbody setbacks apply where required by the Natural Character and Freshwater Bodies Chapter of the District Plan" for a number of reasons.

Secondly, we have serious concerns about the provision that "Stormwater for the North East Rangiora Development Area discharges into the Taranaki Stream and Cam River."

Thirdly, we have serious concerns about "A third large catchment to the east of the Development Area requires a new pumpstation at the south-eastern point of the Development Area and pumped into a new rising main to Northbrook Road, where it would join onto a rising main to the treatment plant."

This is currently positioned on private property (the title CB21B/843 for 8 Kippenberger) on the map (**Option A and B - Rangiora North East Rangiora Outline Development Plan - Water and Wastewater**), and the title it is positioned on also has a stormwater reserve. Adding these two requirements to the property title makes the property essentially worthless as the area required for the items, along with the esplanade and path means there is no space available for anything else. We are assuming this has been misplaced as it is not located anywhere near the large catchment it references.

Fourthly, we are concerned about the lack of detail around the setoff between the development and neighbouring properties. We would expect that any subdivision is set back with trees or a natural barrier from our boundary rather than being built right up against it. On a related issue, there is currently a boundary between the spring/source of the cam and the main area approved for development. there is no access to the Cam River waters from any part of the new development and this needs to be understood and maintained.

Finally, as part of the section "Two smaller stormwater basins are shown in the south-eastern corner of the Development Area to service the smaller catchments of development of properties at the eastern edge of the site along Golf Links Road", we would again point out that both of these are on our property and again, we are being disproportionately affected by the introduction of a new plan that removes that amount of land from a property owner without compensation or a contribution from other property owners who benefit from the subdivision. Additionally the lay of the land means that any runoff between the Cam and the Taranaki will not reach the proposed location of the smaller catchment area, so the location has clearly not been thought through.

1. As owners of 7 Golf Links and 8 Kippenberger, we are the major property owners affected at all by this provision, and it's incredibly disproportionate. A rough estimate is at complying with this section will mean giving up at least 20% of the Golf Links property (assuming the esplanade requirements are 5m for the Taranaki and 20m for the Cam) and 30% of the Kippenberger Property. To introduce a new plan that removes that amount of land from a property owner without compensation or a contribution from other property owners who benefit from the subdivision is completely unfair.
2. If we were to part subdivide the property, we would lose direct access to the stream, which is an integral part of the property.
3. The Taranaki Stream is not a flowing waterway, and it passes close to our existing dwelling (which is over 150 years old). We have had assurances from council members that this would be removed from the plans as it was agreed that it was unfair but this has not happened.
1. We have asked the council a number of times for details on how the stormwater catchments will function but have not been provided with any detail. Given the increase in weather events and flooding, this is of particular concern for us as property owners who may receive overflow and as protectors of the Cam River which will likely receive dirty stormwater.
2. The stormwater catchment is located near the source of the Cam River, which means dirty storm and waste water will be discharged into the head of the spring that forms the start of the Cam. This is the most pure part of the Cam River and it's unacceptable that there will be stormwater discharged into it, effectively mixing the two forms of waters. as an earlier section of this proposal states "Waterbodies must be protected intact, or improved, as part of any development". Discharging into the head of a stream (the Cam) or creating new waterflows in a stream bed that is not flowing (the Taranaki) does not pass this test.

3. Additionally there needs clarity as to the positioning and drain proposals into the head of the cam. Currently there is no water from the Cam river on the property proposed to be developed, so there will have to be some sort of deliberate discharge into a dry riverbed, meaning a man-made change of the source of the Cam from a natural spring to stormwater discharge which is unacceptable.
4. Further to this, the plan does not make it clear how this will be managed and also shows a discharge from the stormwater catchment onto the property at 8 Kippenberger see for example the map (**Option A - Rangiora North East Rangiora Outline Development Plan - Open Space and Stormwater Reserve**). As the owners of this property, we cannot accept that any water will be collected and discharged onto our property.
5. The Taranaki Stream is currently empty and has not flowed for many years. As owners of 7 Golf Links Road we have concerns about storm water being discharged into it, especially as this is prefaced by "For ecology reasons, it is a requirement to maintain flow quantities into waterways." If there is no water, there is no flows to be maintained, and flows should not be artificially created, especially as this would affect current land use.

Relief sought

DEV-SER-APP1 - South East Rangiora Outline Development Plan

Our main issue with this plan is that as property owners we are massively and disproportionately affected in our options for our land as a result of it. The esplanade requirements entail surrendering over 20% of one property and 30% of another which is far beyond what any other property owners would encounter. We would like a way of mitigating this or sharing the impact over a wider group of property owners, including the residents of the proposed main development who stand to benefit the most from these impositions.

Secondly there is still a complete lack of clarity as to how the stormwater will be dealt with. There is no water in the Cam River in the area proposed for development, so this means this is a proposals to mix storm and source water by running stormwater directly into the head of the Cam River and creating new flows into the Taranaki, both of which are unacceptable. We have made some text recommendations on that below.

The site is split into three stormwater catchments. For ecology reasons, it is a requirement to maintain flow quantities into waterways. Stormwater for the North East Rangiora Development Area should not discharges into the headwaters of the Taranaki Stream and Cam River as this would cause a mixing of the waters. An attenuation basin is shown in the downstream southeast area of the area north of the Taranaki Stream to service the catchment north of the Taranaki Stream. Another attenuation basin is shown downstream in the south-eastern area of the Development Area to service the catchment south of the Cam River. This section needs protection from overflow, both from discharging into the headwaters of the Cam River or onto neighbouring properties. The section of land between the two flow paths contributes runoff to the Taranaki Stream and Cam River. The catchment discharge is piped under the waterways and into the basins for the larger catchments either side of the flow paths. Two smaller stormwater basins are shown in the south-eastern corner of the Development Area to service the smaller catchments of development of properties at the eastern edge of the site along Golf Links Road. All stormwater basins for the North East Rangiora Development Area are assumed could be dry basins, allowed by well-draining land. Alternative solutions for stormwater management need to be could be proposed, provided meaning there is no the flow of water into the Taranaki Stream and Cam River or neighbouring properties are maintained and all future lots in the stormwater catchments can discharge into the appropriate basins.

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We haven't made comments on this section as it appears to have some fundamental issues. The pumpstation at the south-east point of the development area (shown in **Option A and B - Rangiora North East Rangiora Outline Development Plan - Water and Wastewater**) is positioned a long way from the large catchment

A third large catchment to the east of the Development Area requires a new pumpstation at the south-eastern point of the Development Area and pumped into a new rising main to Northbrook Road, where it would join onto a rising main to the treatment plant.

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In terms of accuracy, we'd draw attention to the position of the Cam on the maps such as **(Option A and B - Rangiora North East Rangiora Outline Development Plan - Open Space and Stormwater Reserve)**. We understand these are meant to be indicative, but the river boundaries are so far off as to leave confusion as to the size of the reserve, especially the large one bordering Kippenberger. In some instances it is on the edge of the Cam in others a long way from it. Given the concerns about storm water mixing with the waters at the head of the cam, the positioning of the catchment is incredibly important.