

## PC23 - Whisper Creek Residential

### Submitter Details

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

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**Resident or Ratepayer \***

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

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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**

### Consultation Document Submissions

#### Provision:

#### Oppose

#### Decision Requested:

Oppose 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 susceptible 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](http://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 liquefaction and lateral spread will specifically be undertaken in this development?

<https://www.tandfonline.com/doi/full/10.1080/00288306.2016.1182925> 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 sight 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 Council's 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 susceptible 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](http://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
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 inevitably 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 be 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.

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