

## PC23 - Whisper Creek Residential

### Submitter Details

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

**First name:** Selena May

**Last name:** Coombe

**Organisation:**

Styx Living Laboratory Trust / Lead Volunteer

**Preferred method of contact**

**Email:** selena\_coombe@hotmail.com

**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**

### 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](mailto:styxllbom@gmail.com)

Website: [www.thestyx.org.nz](http://www.thestyx.org.nz)

Facebook: Styx Living Laboratory Trust

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](mailto:selena_coombe@hotmail.com)

Cell Phone: 0272566863

