

PC23 - Whisper Creek Residential

Submitter Details

Submission Date: 26/11/2025

First name: Jan Therese

Last name: Burney

Preferred method of contact

Email: chrgary.jan@xtra.co.nz

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:

Refuse the application

Reason for Decision Requested:

Specific Provisions

This submission relates to the entire proposal

Reasons

Effects of the Proposal The key concerns and multiple adverse effects for the environment , the stormwater receiving environment, roading/transport and the effect on nearby communities

Submitter**Jan Burney****3 & 5 Beacon Street****Brooklands****Christchurch 8083****Email: chrgary.jan@xtra.co.nz****Phone: 0275129928****Date: 11 November 2025****Plan Change 23 – Whisper Creek, Spencerville****A. Application to which submission relates:**

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.

B. I oppose Plan Change 23 (Whisper Creek, Spencerville) in its entirety.

The submitter opposes all aspects of the proposal Relevant part(s) of the application . This submission relates to the entire proposal

C. Effects of the Proposal

The key concerns and multiple adverse effects for the environment , the stormwater receiving environment and the nearby communities, are as follows:

The Infrastructure Report (19432 Rev4, May 2025) and supporting transport assessment (Appendices B and E) fail to demonstrate alignment with the Canterbury Regional Policy Statement, Greater Christchurch Spatial Plan, Greater Christchurch Transport Plan, Canterbury Regional Land Transport Plan 2024, and Ōtautahi Christchurch Future Transport 2024–54: - and

Key submission points

1. Public Transport Deficiency

- No public transport routes currently serve the site.
- Route 135 terminates at Prestons and operates only hourly.
- PT provision is described as a future possibility, not a committed, funded service with defined routes, frequencies, stops, shelters, or bus priority. → This fails integration and mode-shift requirements.

2. Cycling and Walking Gaps

- No cycle facilities exist in the immediate vicinity.
- Reliance on recreational/shared paths (Styx Mill Conservation Loop, Lower Styx Road) does not provide continuous, protected utility cycling to schools, centres, or employment.
- No pedestrian priority treatments at intersections. → This undermines 15-minute neighbourhood and active mode objectives.

3. Car-Inducing Road Upgrades and Weak Staging

- Off-site upgrades focus on road widening and a left-turn lane at Marshland/Turners Road.
- The only staging trigger applies at the 701st dwelling.
- No binding thresholds tied to PT commencement, protected cycling delivery, or emissions mitigation. → This locks in car dependence and risks arterial performance.

4. No Mode Share, VKT, or Emissions Assessment

- Traffic increases quantified (6,560 daily; 720 peak) but no mode share targets, VKT analysis, or greenhouse gas assessment provided. → This fails regional decarbonisation and climate commitments.

5. Safety and Vision Zero Failures

- Intersection designs (Figures 16, 17, and 14) are concept-only.
- No, Safe System package, speed management, or committed school route treatments. → This does not meet Vision Zero principles.

6. Flood Risk and Resilience Concerns

- Flood modelling is incomplete and interim data is being used.
- Filling is proposed within the Flood Management Area to achieve platform levels.
- No evacuation modelling or redundancy analysis for access routes in flood events. → This fails resilience expectations under Ōtautahi Christchurch Future Transport 2024–54.

- **Stormwater and Receiving Environment**

- **Brooklands Context:**

- Stormwater discharge flows directly into Brooklands and the Styx River, both sensitive receiving environments.

- The application assumes that Brooklands is vacated, however the area is populated with residentially zoned properties.

- 7. Stormwater Capacity Concerns:** Large roof and hardstand areas will rapidly increase runoff. Basins appear undersized and located in flood zones, risking inundation. Spencer Drain's gradient (1/6000) is inadequate for current and future flows.
- 8. Critical Infrastructure Overlooked:** Pumping stations and Styx River flood gates are not considered in modelling. These gates can remain closed during tidal or flood events, causing backflow and flooding.
- 9. Natural Hazard Risks:** 800 houses will add congestion to limited exit routes, undermining tsunami evacuation. The site lies within a tsunami hazard zone and is vulnerable to sea-level rise and coastal flooding.
- 10. Three Waters Issues:** Potable water supply is insufficient. Reliance on bores risks over-allocation and impacts on nearby wells.

11. Ecological Degradation: The Styx River is already degraded. A 2023 Boffa Miskell survey shows rising zinc and sediment levels linked to urbanisation. The applicant's ecological assessment ignores this evidence. Untreated or poorly treated stormwater will worsen contamination, harming invertebrates and collapsing the food chain.

12. Infrastructure Strain: Increased reliance on the one-way Spencerville Road bridge for city access and recreation. The bridge is inadequate and requires upgrading to two lanes.

13. Misalignment with Funding Programmes

- The Long Term Plan (2024–2034) identified no relevant transport projects supporting the rezoning.
- Required upgrades and services are unfunded and not sequenced in RLTP/NLTP. → This undermines deliverability and strategic network protection.

Conclusion

The proposed rezoning introduces significant transport and infrastructure risks without demonstrating compliance with higher-order planning instruments.

I reserve the right to expand on these points in greater detail during the next submission phase or hearing, including reference to specific policy clauses, modelling assumptions, and infrastructure delivery risks.

Date: 17 November 2025

Submitter:

Jan Burney
Brooklands
Christchurch 8083
chrgary.jan@xtra.co.nz