

PC23 - Whisper Creek Residential

Submitter Details

Submission Date: 26/11/2025

First name: Kristin and Andrew

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Preferred method of contact

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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:

see attached

Reason for Decision Requested:

Specific Provisions

see attached

Reasons

see attached

SUBMISSION ON PROPOSED PLAN CHANGE 23

TO

CHRISTCHURCH CITY COUNCIL

RMA FORM 5

Submission on publicly notified**Proposed Plan Change 23 to the Christchurch City Council District Plan****Clause 6 of the First Schedule, Resource Management Act 1991**To: **Christchurch City Council**1. **Submitter details:**

Full Name	Kristin Buxton and Andrew Buxton		
Company/Organisation <i>if applicable</i>	n/a		
Contact Person <i>if different</i>	Kristin Buxton		
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	Christchurch	8083	
Address for Service <i>if different</i>	Postal Address		Courier Address
Phone	Mobile	Home	Work
	027 378 6079		

2. This is a **submission** on the **Proposed Plan Change 23 to the District Plan** for Christchurch City Council
3. We **could not** gain an advantage in trade competition through this submission.
If you could gain an advantage in trade competition through this submission please complete point four below: n/a
4. We are **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.

Note:

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.

- 5. We **wish to be heard** in support of my submission.

- 6. We **would** consider presenting a joint case with other submitters, who make a similar submission, at a hearing.

Please complete section below (insert additional boxes per provision you are submitting on):

The specific provision of the proposal that my submission relates to:
See attached
Do you: Support? Oppose? Amend?
See attached
What decision are you seeking from Council?
What action would you like: Retain? Amend? Add? Delete?
Reasons:
See attached

1. SUBMISSION – DECISION REQUESTED

Christchurch City Council (CCC) has notified Private Plan Change 23 (PC23) to the Operative District Plan. This proposed Private Plan Change relates to land at 144, 156 and 176 Turners Road and 174, 220 and 240 Spencerville Road and 161 Lower Styx Road.

The proposed Private Plan Change seeks to enable residential development at 144, 156 and 176 Turners Road and 174, 220 and 240 Spencerville Road.

It is anticipated that 800 households and a neighbourhood commercial centre could be developed. If the rezoning is approved the scope of the private plan change includes:

- To rezone operative Special Purpose Golf Resort Zone and Rural Urban Fringe Zone upper terrace sites to Residential New Neighbourhood Zone; and
- To rezone lower terrace areas subject to the High Flood Management Area from Special Purpose Golf Resort Zone to Rural Urban Fringe Zone;
- To enable a Neighbourhood Centre to be located at the site;
- Retain the existing Open Space Waterway and Margins Zone along the Styx River; and
- Amend provisions in the Christchurch District Plan that are relevant to the site, including inserting a new Outline Development Plan to guide development of the site

This submission sets out overall response to the public notification of PC23 which is that we seek it is **declined** and that the current zoning of all the land remain. We make this submission for the following reasons:

The proposed rezoning will be a significant departure from the currently allowable development and use of land provided under the Special Purpose Golf Zone as set out in the objectives of that plan change (PC14) as described below:

“Objectiveto provide golfing and associated facilities (including resort facilities) of international standard, bringing economic and social benefits to the City and region, and to provide other recreational opportunities, and limited residential development, within extensive open space and lake or riparian settings, with no significant adverse effects on the natural or adjoining rural environments...”¹

And as depicted below:

¹ PC14 – notification of proposed provisions of District Plan (<https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Provisions/Plan-Change-14-HBC-NOTIFICATION-Sub-chapter-13.9-Specific-Purpose-Golf-Resort.pdf>)

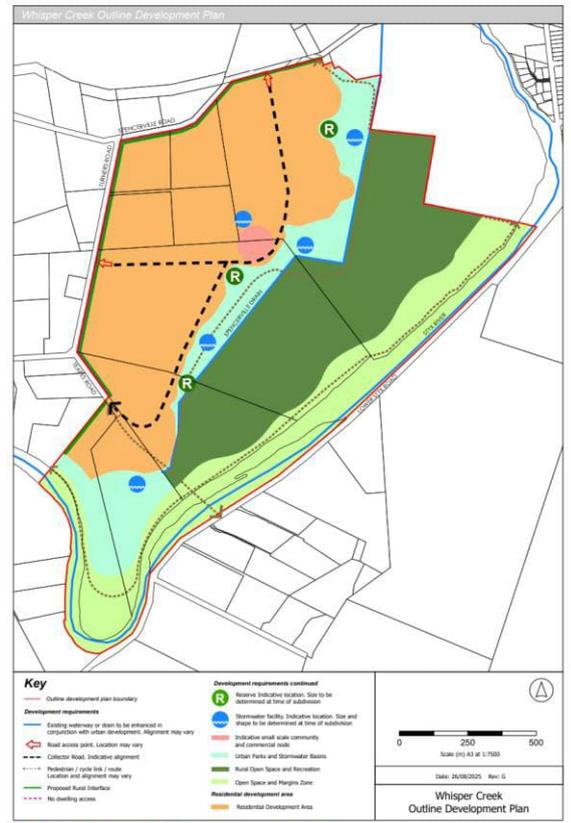
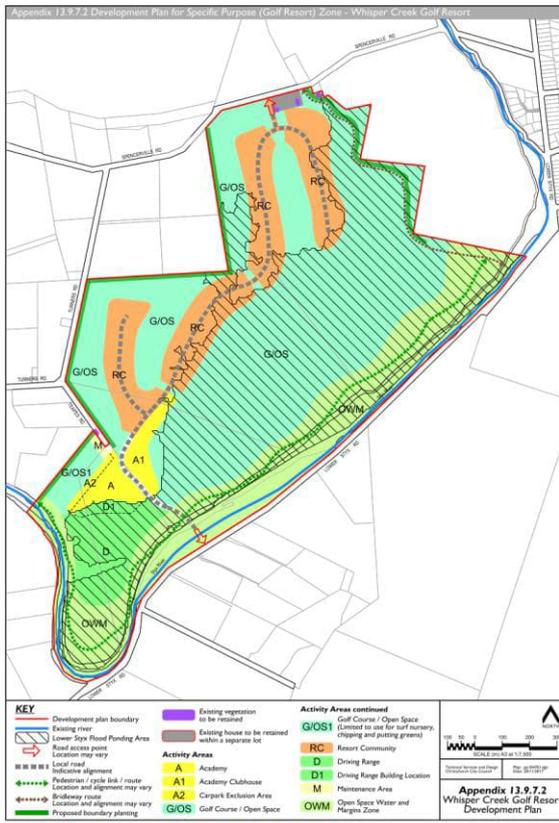


Figure 1: Left Image: Whisper Creek Golf Resort Development Plan showing areas of Golf Course, Open Space Water and Marin Zone, indicative local roading connections; and future subdivision (identified as RC - Resort Community) versus proposed zoning on right. Source: Applicant document set -)

The rezoning could allow a significant density of new residential and some commercial development on highly productive soils, within a natural hazard environment and which will adversely affect natural biodiversity values, as well as landscape and open space values. The proposal is not necessary to achieve outcomes sought by the National Policy Statement on Urban Development.

The proposal in relation to management of natural hazards is inconsistent with the District Plan’s objectives and policies and overall objectives of the Resource Management Act. Parts of the land will be inundated in a 1% AEP event (100 year flood event) as indicated in Figure 2 below. The land has high groundwater and there may be adverse effects on groundwater values and levels from increased stormwater run-off from this development.

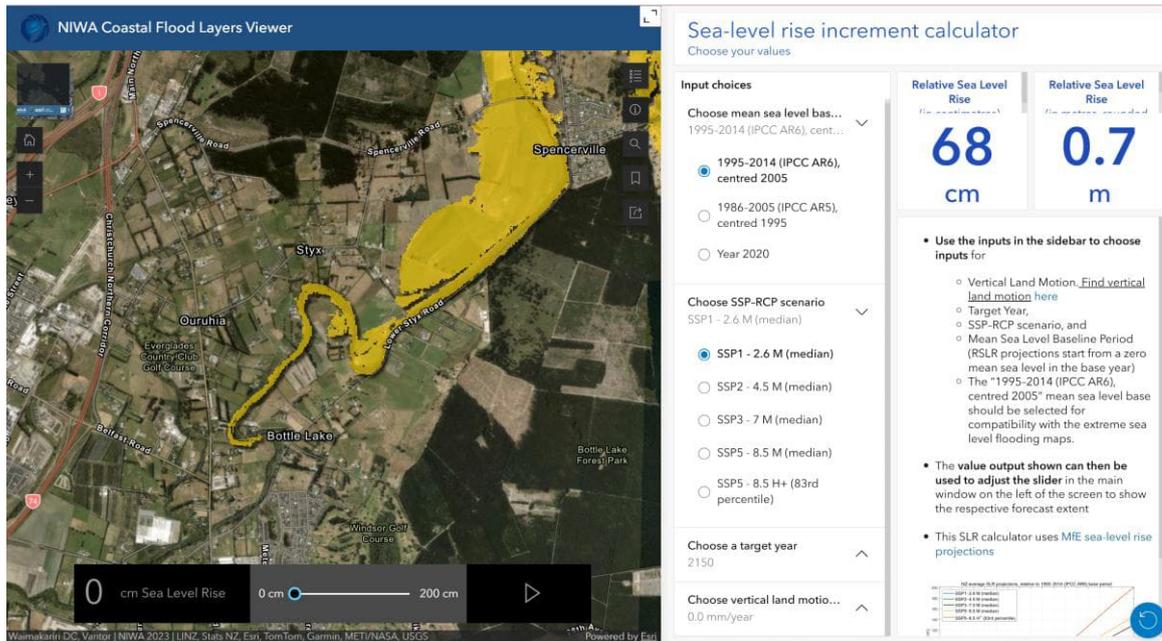


Figure 2: Sea level rise scenario SSP1-2.6M in vicinity of rezoning. Yellow indicates inundation up to 0.7 metres (source: NIWA Coastal Flood Layer Dataset <https://experience.arcgis.com/experience/8e3d7262cc9846968f0bfb86da0806f8>)

The rezoning of this land which will result in significant increase in development on it will require extensive earthworks and filling and creation of attenuation areas². The effects of modifying the environment to mitigate the potential flood risk in conjunction with additional stormwater generated by the proposed development, has not been adequately addressed or modelled in the application documents. These effects will include diversion of flood waters onto neighbouring properties and downstream properties; effects on groundwater increases or decreases; effects on adjacent bores; effects on biodiversity; risk to human life and structures; and adverse effects on existing roads and other infrastructure.

The use of this land was not anticipated by Council’s Growth Strategy (see Figure 1 below) and the Greater Christchurch Spatial Plan. The proposed rezoning is not required to meet growth targets set out in the National Policy Statement on Urban Development (NPS-UD) as Christchurch City Council has confirmed its housing plan provides for future growth, with modelling showing plan enabled feasible housing capacity for at least 68,200 homes, exceeding the 65,640 homes needed to meet the statutory requirement for 30 years of adjusted demand. This area of land that is the subject of this private plan change has not been identified for future growth in Council’s Growth Strategy.

² Response to RFI by applicant source: <https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2025/PC23/PC23-1st-RFI-Response-Stormwater-29.07.2025.PDF>

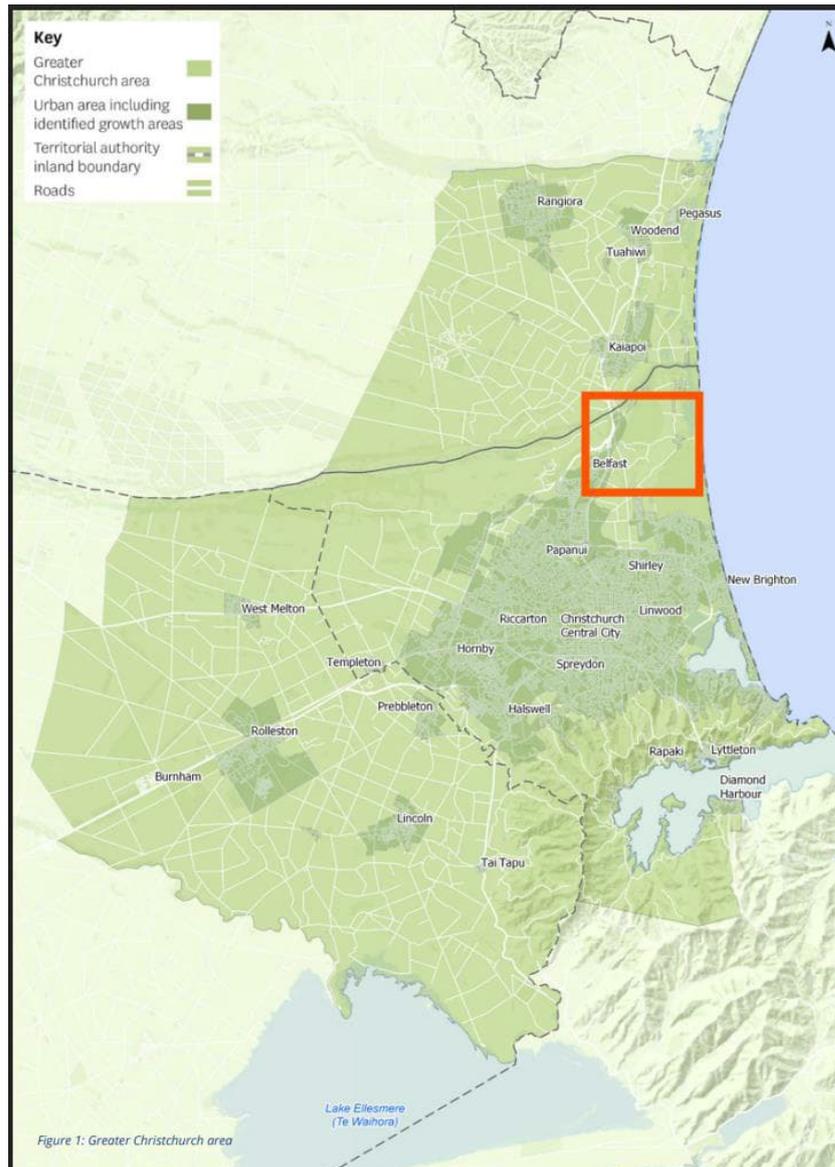


Figure 3: *Our Space 2018 – 2048:* Christchurch City Council Growth Strategy. Area highlighted by orange outline is location of proposed plan change (Source: <https://www.greaterchristchurch.org.nz/assets/Documents/Resources/Projects/Urban-Development-Strategy/Our-Space-2018-2048.pdf>)

There is insufficient infrastructure, including potable water, reticulated sewage, stormwater, roading, cycleways and walkway facilities to ensure all potential adverse effects on the environment can be avoided, remedied or mitigated. The site is located within a Qualifying Matter area identified as a Wastewater Constraint Area. According to the document set and the legal opinion around the Qualifying Matter it was noted that, “some intensification is considered potentially feasible in greenfield RNN areas, for the most part, the Three Waters infrastructure was constructed to service these areas, which were sized according to the zoning as per the District Plan. It was concluded that upgrading the infrastructure would not be cost-effective or economically feasible³.” Even without medium density development being provided for, the servicing required for the proposed level of development proposed does not adequately address this

³ Application documents – Appendix N, para 13 (sourced: <https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2025/PC23/Notification/NOTIFICATION-PC-23-APPENDIX-N-Application-of-MDRS-RFI-29.07.2025.PDF>)

constraint. The proposal is inconsistent with the relevant objectives and policies of the NPS-UD and the relevant District Plan objectives and policies.

There has also been insufficient modelling of effects on levels of service for the increased traffic on roads in the short, medium and long term.

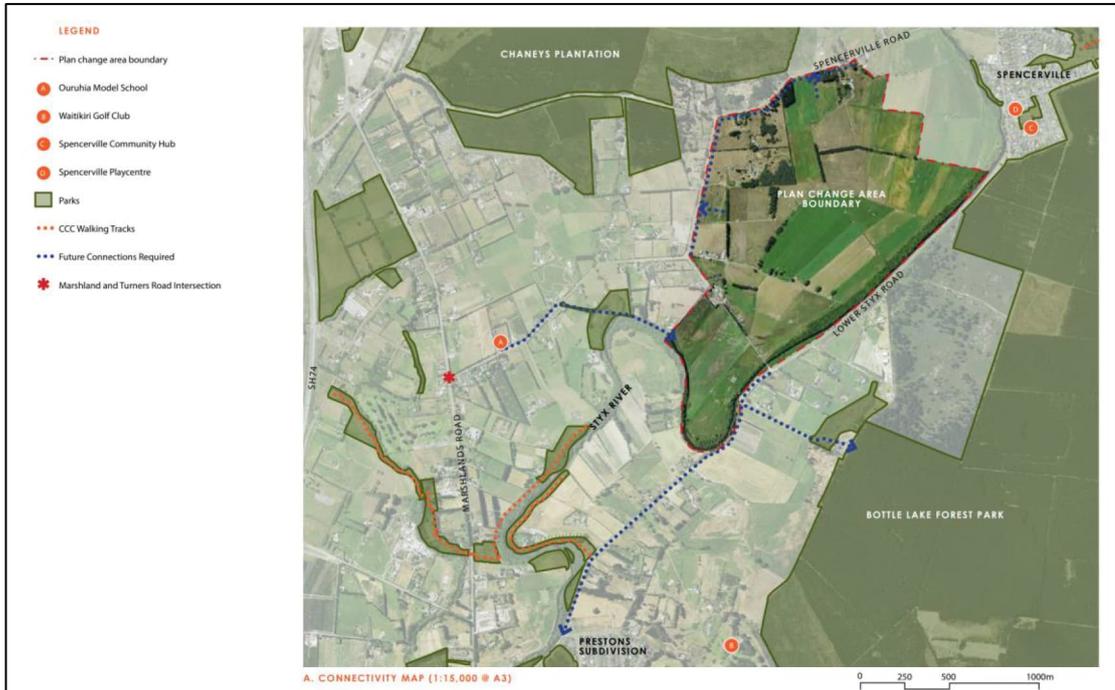


Figure 4: Connectivity Map prepared by applicant showing development in relation to the local roading network (source: Application documents prepared by DCM Urban. <https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2025/PC23/PC23-2nd-RFI-Response-Appendix-2-Graphic-Attachment-28.8.25.PDF>)

A small area of the Rural Urban Fringe Zone properties are partially located within Land Use Capability Soil II. Under the NPS-HPL, the rezoning of Class II soils must be avoided. There is no exception to this provision. This land is not exempt under the NPS-HPL and therefore the rezoning of this land should be avoided.

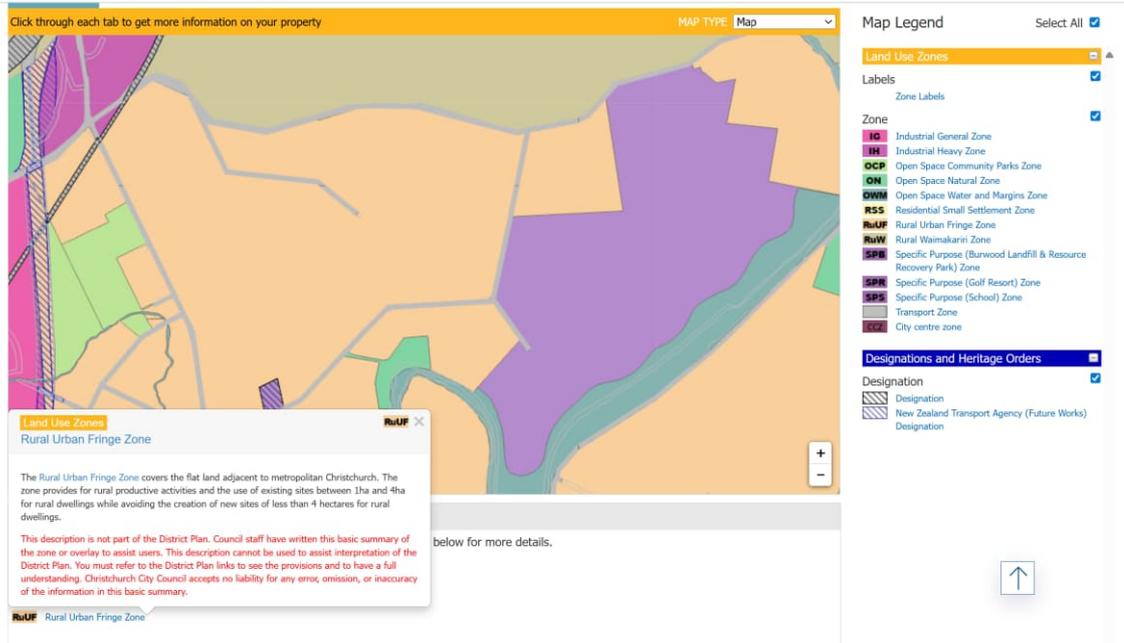


Figure 5: Zoning of Subject Land showing Area in orange as Rural Urban Fringe Zone being for rural productive activities (source: CCC EPI)

In addition to loss of highly productive land, future and open space areas, the proposed use of the land will have adverse effects on rural amenity and character values that will be irreversible. The new residential and commercial developments are within a wider sensitive environmental landscape on which potential adverse effects will not be able to be appropriately mitigated. The Landscape and Visual Assessment are incomplete and insufficient and do not adequately address these effects. The application does not adequately identify potential natural wetlands within the site and how those will be protected.

In the event that the application is not declined, this submission sets out generally, the parts of the Proposed PC23 that we seek **Amend**, together with reasons for the suggested amendments.

3. SUBMISSION AND CHANGES SOUGHT

We **oppose** Proposed PC23 for the reasons set out above:

1. The proposed rezoning does not represent a well-functioning urban environment
2. The increased provision of housing is not necessary to meet the demand over the next 30 years
3. There is insufficient infrastructure to service the proposed development including waste water and potable water services
4. There is a failure to provide appropriate roading, cycleway and walkway connections
5. There will be a loss of highly productive land, natural wetlands and other open space land
6. There will be adverse impacts on the environment, including on natural and landscape values that have not been appropriately mitigated

Should the application be approved, we **seek** the following general amendments to PC23 to better achieve the Purpose of the RMA. We reserve the right to request further amendments through the hearing process to address the concerns that we have raised in our submission.

A. Reject the changes to the Specific Purpose Zone to remove references to Whisper Creek

Reasons: We are seeking that the land use for this area does not change.

HOWEVER, should the Hearing Commissioners consider recommending approval, we request the following amendments be made:

B. Require amendments to the Plan Change to include compliance with a Development Plan for the area in Chapter 8 of the District Plan including and as follows:

- a. Finalise an **Approved Outline Development Plan** for the entire area to be rezoned including Open Space Zone; Rural Urban Fringe Zone and New Neighbourhood zone that gives effect to updated flood models showing extent of 0.5% AEP event and any natural wetlands
- b. Provide for subdivision within the **Approved Outline Development Plan as a Restricted Discretionary Activity** under Rule RD.2 under Chapter 8.5.1 of the District Plan
- c. Provide for **Matters of Discretion** for any subdivision of land within the **Approved Outline Development Plan** to include, but not limited to, the following:
 - i. Compliance with the approved Outline Development Plan
 - ii. Earthworks Depth Range Plans and Cut & Fill Quantities
 - iii. Servicing Plans
 - iv. Flood modelling of post development inundation and stormwater to 0.5% AEP event
 - v. Groundwater monitoring to assess stormwater effects
 - vi. Identification and protection of all natural wetlands
 - vii. Provision of reticulated wastewater, potable water, water for fire-fighting purposes and stormwater services

- viii. Ownership arrangements of all infrastructure including on-going maintenance requirements
 - ix. Road safety audits for all new intersections
 - x. Transportation assessments
 - xi. Geotechnical engineering in relation to management of natural hazards including liquefaction
- d. Add to Appendix 8.4.1.2 in the District Plan a **new Outline Development Plan** for the area as provided in the applicant’s documents showing areas of development including but not limited to existing and new roading networks; stormwater areas, areas to be protected for natural values and open space values
- e. Provide as a **non-complying activity**, any subdivision that is not consistent with the approved Outline Development Plan. Add to Activity Status Table in 8.5.1.5 of the District, subdivision in the Outline Development Plan that does not comply with the RDA Rule RD.2.

Reasons: The land must be suitable for the level of development proposed. The proposed plan change 23 does not provide sufficient information to determine the level of effects and whether those effects have been adequately avoided, remedied or mitigated. The activity status and matters of discretion should ensure that these matters are addressed before any subdivision of the land is approved. As proposed, any subdivision of land within the Outline Development Plan would be a controlled activity which Council must grant consent to. Given the lack of information submitted with the application, this is not considered an appropriate activity status.

C. Amendments to Rules as shown via Track Changes on the attached document (see following page):

Reasons: The land must be suitable for the level of development proposed. The proposed plan change 23 does not provide sufficient information to determine the level of effects and whether those effects have been adequately avoided, remedied or mitigated. The activity status and matters of discretion should ensure that these matters are addressed before any subdivision of the land is approved.

D. Any of changes deemed necessary as a result of amendments to the proposal or to give effect to a better urban form outcomes.

Reasons: The land must be suitable for the level of development proposed. The proposed plan change 23 does not provide sufficient information to determine the level of effects and whether those effects have been adequately avoided, remedied or mitigated. This submission reserves the right to comment on additional matters that may be brought up at the hearing and to address matters relating to better urban form outcomes.

PROPOSED CHANGES TO RULE FRAMEWORK AS PROPOSED BY THE APPLICANT WITH
CHANGES PROPOSED BY THE SUBMITTOR

From Submitter: Refer to track changes included as part of this submission plan change 23 in accordance with Submission Point C above. Underlined shows proposed new amendments; and ~~strikeout~~ shows proposed deletions to text.

Whisper Creek Plan Change – Key Amendments

This table is provided as a summary means of comparing the key changes between the operative Specific Purpose (Golf Resort) Zone and the Residential New Neighbourhood Zone. It focusses on the key changes, rather than seeking to compare every activity and built form rule.

A comparison with the Rural Urban Fringe Zone is not provided as the RUF and RNN zones seek fundamentally different outcomes and therefore there is little value in providing a comparison as the rule frameworks and anticipated outcomes are fundamentally different.

Key Outcomes	
Existing SP (Golf Resort) Zone	Proposed RNN Zone
One of two Specific Purpose (Golf Resort) Zones, with Clearwater being the other location with this zoning.	Adoption of the well-established and tested Residential New Neighbourhood Zone (RNN) framework to replace the SP Golf and RUF Zone. Subject to the relevant changes that enable an appropriate assessment against the Approved Outline Development Plan
Four lifestyle blocks in the northwest corner have a Rural Urban Fringe Zone (RUF) and are not covered by the current ODP.	Include the four RUF lifestyle blocks in the plan change to RNN. Except where those lifestyle blocks are located within Class II soils and in which case the RUF zoning should remain.
The Styx River edge of the site has an Open Space Water & Margins Zone (OSWM).	Retain the OSWM Zone adjacent to the Styx River.
Development guided by an Outline Development Plan (ODP), with various 'activity areas' shown, These areas include a high density resort (hotel, hospitality, and student hostel), a residential area, and a golf course/ open space area.	Retain an ODP for the entire site. Simplify the ODP by removing the various different types of development area as all of the development area will be for housing.
Development area focussed on the upper terrace, with much of the open space area located within a Flood Management Area.	Retain focus of the development area on the upper terrace, with open space and recreation on the lower terrace.
The ODP shows walking trails are shown along the river margins.	Retain walking trails along the river margins.
Road access is from Spencerville road, and over a bridge to Lower Styx Road, with a service entrance from Teapes Road.	Road access is from Spencerville Road, Turners Road, and Teapes Road. No vehicle access is proposed to Lower Styx Road
No pedestrian or cycle links proposed to connect the site to the wider neighbourhood or nearby recreation opportunities.	Extended pedestrian and cycle links to Ouruhia Model School, Bottle Lake Forest, and Prestons suburb are proposed. Include in relevant objectives and policies and show on the Outline Plan of Development.
Internal ODP road network is not designed to accommodate public transport.	Internal ODP network includes a collector road loop to provide opportunity for public transport. Include in relevant objectives and policies and show on the Outline Plan of Development.

Landscape buffer and 20m building setback
from rural zone internal boundaries
Submitted by Kristin and Andrew Baker
15 November 2025

Inclusion of the adjacent RUF lifestyle blocks in
the plan change means internal setback rules
and planting is not necessary. Stormwater

Provides for:	Provides for:
<ul style="list-style-type: none"> • 150 residential units • 160 bed student dormitory • 380 resort bedrooms • Rural activities and ecological restoration • Outdoor recreation activities • Clubhouse, restaurants, gym, indoor sports complex • Food and beverage outlets (1,000m²) • Retail (500m²) • Golf academy and education spaces 	<ul style="list-style-type: none"> • 800 residential units estimate at 15 hh/ha • Rural activities and ecological restoration • Outdoor recreation activities in reserves • Neighbourhood centre (size subject to RC under RNN rules) • Ecological restoration • Protection of all natural wetlands • Protection of ground water and surface water through on-site treatment of stormwater for all roads and right of ways • Provide for hydraulic neutrality of stormwater • Provide for low-impact water sensitive urban design
Rule Framework	
Specific Purpose (Golf Resort) Zone	Residential New Neighbourhood Zone
Permitted	
P1 – All rural activities permitted in the RUF zone	P21 - All rural activities permitted in the RUF zone
P2 recreation	P23 – Reserves, and recreation is permitted in the RUF Zone (P10) so covered by P21 above
P3 wetland restoration	Permitted in the RUF Zone (P9) so covered by P21 above
P4 -P6 clubhouse, F&B and retail – 1,000m ² GFA F&B, 500m ² GLFA retail	P8-P16 – range of community facilities and activities, some of which are subject to scale limits
P7-P9 Golf academy and apartments – 160 academy bedrooms, 380 resort bedrooms of which no more than 170 prior to the golf course being constructed	P24 and P26 – small-scale hosted and unhosted visitor accommodation (Air B&B type activity)
P10 Residential – 150 units with boundary planting to be in place first	P1-P4 residential activity. Number of units subject to RNN built form and subdivision rules Add to policy – consistent with the approved Outline Development Plan
P11-12 – driving range subject to noise and lighting controls	N/A
Controlled activities	
No controlled activities	C1 – retirement villages
	C2 – comprehensive residential development

Restricted discretionary

See – D1 below
Submission by Kristin and Andrew Buxton
15 November 2025

RD2 – Activities that are not in accordance with
an ODP¹ Page 19
Support this as an Restricted Discretionary

	Activity subject to the same range of Matters of Discretion applicable to the subdivision (see Submission Request B above)
RD1-4 – anything that is RD in the rural zone, plus any built form rule breach	RD23 – anything that is RD in the rural zone, plus any built form rule breach
RD5 – construction of golf course and planting subject to a management plan	N/A. Development of any reserves prior to vesting with Council is a matter of discretion determined through the subdivision process.
RD6 – subdivision of academy areas A-A2 subject to a concept plan	Subject to Subdivision rules applicable to the RNN Zone
Discretionary	
D1 – any activity located outside of the area for that activity shown on the ODP	See RD2 above
See NC1 below	D1 – Any activity not otherwise listed
See NC5 below	D2-D8 – oversized community activities and visitor accommodation
Non-complying	
NC1 – Any activity not otherwise listed	See D1 above <u>Any activity within the approved Outline Development Plan that does not comply with RD1 above.</u>
NC2 – Any road access that is not a single road from Lower Styx and Spencerville Road or a service road from Teapes Road	Subject to subdivision rules regarding the design and location of new access points. Subject to the need to be in accordance with the ODP regarding a single access to Spencerville Road, Turners Road, and Teapes Road. No vehicle access is proposed to Lower Styx Road
NC3 -No occupancy until Styx/ marshlands intersection is signalised	N/A – this intersection is now signalised, and vehicle access is no longer proposed to Lower Styx Road
NC5 – Activity limits: <ul style="list-style-type: none"> - F&B and retail over GFA limit - 160+ dormitory bedrooms - 380+resort bedrooms of which no more than 170 can be built before the golf course - 150+ resi units, with none to be built before boundary planting - Driving range noise and light control breaches 	No limit on residential numbers (subject to RNN built form standards) Limits on the scale of non-residential activities subject to D1-D8
Prohibited activities	
No prohibited activities	No prohibited activities

¹ See also the comprehensive suite of subdivision matters of discretion 8.8.8 and 8.8.9 regarding alignment of ODP outcomes and RNN greenfield development
 15 November 2025 Page 20

Built form standards	
Road setback - 100m building setback from Turners Rd, Spencerville Rd, and Teapes Rd	Road setback - 10m setback proposed in the ODP narrative for these three roads. 4m setback form internal roads (14.12.2.11a); Road landscaping – 5m deep proposed in the ODP narrative for these three roads. 2m strip for internal roads (14.12.2.7a)
Internal boundary setback - 20m from rural zone boundary	Internal boundary setbacks -1m (14.12.2.5ai)
Height - 8m permitted; 8-12m = D; 12m+ = NC	Height – 8m; 11m for comprehensive development; RD if higher