

# Notice of Further Submission on Proposed Plan Change 62

## Resource Management Act 1991 - Form 6

**Name of Submitter:** Canterbury Regional Council (Environment Canterbury)

**Physical Address:** 200 Tuam Street, Christchurch, 8011

**Address for service:** Canterbury Regional Council

PO Box 345

Christchurch 8140

**Contact Person:** Sam Leonard

**Email:** [sam.leonard@ecan.govt.nz](mailto:sam.leonard@ecan.govt.nz)

**Telephone:** 027 801 7849

**Declaration:** We are a local authority for the relevant area

## This is a further submission on proposed Plan Change 62

We support parts of the following submissions:

Submitter	Submitter Details	Decision Number That We Support	Summary of Submission
<b>Alan and Janet Manning</b>	9 Spring Place Leeston 7632 janet.alan@xtra.co.nz	D2.2	Concerned that increased development will increase flooding over property
<b>Rachael Marriott</b>	11 Spring Place Leeston 7632 alamoderach@gmail.com	D7.2	Concerned that increased development will make flooding worse
<b>Nicki Warren</b>	24 Spring Place Leeston 7632 nickiwarren@hotmail.com	D11.4	Concerned that the town does not have sufficient infrastructure to support additional homes
			Concerned that increased

		D11.5	development will make flooding worse
<b>Toby and Lisa Pullen</b>	26 Mountain View Place Leeston 7632 tobiaslayby@hotmail.com	D12.2	Concerned about the likelihood of increased flooding
<b>Stuart and June McLachlan</b>	44 Bluetts Road RD3 Leeston 7683 daffodils@xtra.co.nz	D17.1	Concerned about the likelihood of increased flooding
		D17.2	Concerned about the impact that the future development of the proposed plan change area may have on water quality of Birdlings Brook and Harts Creek
<b>Harts Creek Streamcare Group</b>	C/- C.M. Barnett 217 Harts Road RD3 Leeston 7683 carey.barnett@xtra.co.nz	D18.1	Concerned about the impact that the future development of the proposed plan change area may have on water quality of Birdlings Brook and Harts Creek

## The reasons for our further submission are:

### Canterbury Regional Policy Statement Direction

There are various directions in the Canterbury Regional Policy Statement (CRPS) that seek the appropriate mitigation of natural hazards (including those from flooding), the provision of servicing infrastructure, and the protection and maintenance of water quality. Whilst acknowledging that these matters can be dealt with at the subdivision stage we would like to reiterate the expectations of the regional policy framework with regards to the concerns raised in the above submission points.

**Natural Hazards:**

- That new buildings are required to have an appropriate floor level above the 0.5% AEP design flood level (CRPS Policy 11.3.2)
  - That the development of the property does not exacerbate flooding on neighbouring properties by diverting or displacing floodwater

**Stormwater**

- That development is appropriately and efficiently served for the collection of stormwater (CRPS Policy 5.3.5)
  - That services are designed and built to maximise ongoing effectiveness
- Development that would constrain the existing stormwater infrastructure is avoided (CRPS Policy 5.3.6)
  - Infrastructure is designed to avoid adverse effects on significant natural and physical resources
  - That other adverse effects on the environment are controlled

**Water quality**

- Activities producing adverse effects on water quality (such as stormwater discharges) are managed under the regional planning framework
- Harts creek is a spring-fed plains river identified in Chapter 11 of the Canterbury Land and Water Regional Plan for freshwater outcomes as well as being located within the Cultural Landscape/Values Management Area.

There is not enough detail to determine the appropriateness of the proposed stormwater servicing at this stage. We would like to provide some caution about the concerns that will need to be addressed at the subdivision and consenting stage:

- Avoiding increases in peak flows downstream by stormwater attenuation will not necessarily address an overall increase in the total volume of surface water runoff
  - Proposals to encourage soakage to ground (such as roof runoff going to soakage on individual lots) would assist with this
- The servicing plan shows a secondary flow path moving in both directions along High Street towards Birdlings Brook and to Chapman Street. High Street slopes close to 2m towards Chapman Street so in practice this secondary flow path will only head towards to Chapmans St and not Birdlings Brook
- Clarity will be needed on which rural areas contribute to the Chapman St pipe
- The proposed area is outside of the area subject to the SDC stormwater network area for Leeston
  - A separate resource consent will be required to address the stormwater discharge from this new area
  - Effects on water quantity and quality in the surrounding environment will need to be assessed

**The decision we would like the Council to make is:**

We request that the above submission points are addressed through the clarification and provision of further details on how these concerns will be managed. We acknowledge that

this level of detail may be more appropriately presented at the resource consent stage for subdivision and stormwater, but we believe it is prudent to highlight these concerns at this early stage. Some of these concerns could be addressed in the Outline Development Plan.

**We do not wish to speak in support of our submission.**

A handwritten signature in black ink, consisting of a large, stylized 'A' followed by a horizontal line extending to the right.

Andrew Parrish

Planning Section Manager

(Authorised under delegated authority from the Canterbury Regional Council)

Date: 18/03/2020