

## Submission on a Publicly Notified Plan Change

**To:** Timaru District Council

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

This is a submission on an application, as per above, from:

Seadown Properties Limited

For:

**Proposed Plan Change 22:** Rezone Rural 1 and 2 land to Industrial L at Washdyke Flat Road, Timaru

**The specific parts of the application that our submission relates to are:**

The potential effects of the zone change on water quality, ecosystems, and transport systems.

**Our submission is:**

Thank you for the opportunity to provide feedback on the private plan change request by Seadown Properties Ltd to rezone land at Washdyke Flat Road, Washdyke, Timaru from Rural 1 and 2 to Industrial L.

Environment Canterbury is neutral with regards to the outcome of this plan change, provided appropriate mitigation is carried out to protect the quality of waterbodies receiving stormwater from the site, and any associated ecosystems. We note that the applicant consulted with Environment Canterbury prior to lodging the application and subsequently made amendments. We would like to reiterate the importance of this mitigation in achieving regional outcomes.

### *Regional Planning Framework*

The application is not contrary to the regional planning framework but may be partially inconsistent with the Canterbury Regional Policy Statement.

Objective 5.2.3 – Transport Network (emphasis added)

*A safe, efficient and effective transport system to meet local regional, inter-regional and national needs for transport, which:*

1. *supports a consolidated and sustainable urban form;*
2. *avoids, remedies or mitigates the adverse effects of transport use and its provision;*
3. *provides an acceptable level of accessibility; and*
4. *is consistent with the regional roading hierarchy identified in the Regional Land Transport Strategy.*

CRPS Policy 7.2.3 – Protection of the intrinsic values of waterbodies and their riparian zones (emphasis added)

*The overall quality of freshwater in the region is maintained or improved, and the life supporting capacity, ecosystem processes and indigenous species and their associated fresh water ecosystems are safeguarded.*

CRPS Policy 8.3.7 – Improve water quality in degraded areas

*To improve the quality of Canterbury's coastal waters in areas where degraded water quality has significant adverse effects on natural, cultural, amenity and recreational values.*

It is important that the extent of potential effects from the expansion of the Industrial L Zone on Waitarakao lagoon be investigated, and mitigating steps put in place to ensure associated ecosystems and cultural values are not adversely affected in a way that would be inconsistent with these policies.

#### *Site Specific Comments*

#### Flooding and drainage

We can confirm that flooding and drainage issues were addressed via consenting and bylaw processes. However, it might of be interest to note that while the recent stopbank upgrade was important for the protection of the existing industrial area downstream of the highway, we also recognize that it may encourage further industrial development that is subject to flood risk in the future, if the stopbank was overwhelmed.

#### Waitarakao

Washdyke Creek, which runs adjacent to the site to the south, is one of two main inputs into Waitarakao / Washdyke Lagoon. The lagoon is ecologically and culturally significant. Increased stormwater inputs into the lagoon have the potential to impact upon its values.

The Waitarakao Working Group, which includes representatives from Environment Canterbury, Timaru District Council, Te Rūnanga o Arowhenua, and the Department of Conservation, was established several years ago to collaboratively protect and enhance Waitarakao Lagoon because it has a high level of significance. We would like to ensure that the plan change outcomes align with the outcomes sought by the working group

#### Three waters

The application states that the site will be serviced by the reticulated water, stormwater, and wastewater systems, or otherwise covered by regional council consents CRC182776 and CRC182778. Any future discharge of roof water from future buildings to ground via soakpits may require additional resource consent as they would not be covered by the regional council stormwater discharge consents.

Although these consents have been obtained, it is worth noting that the design of stormwater systems for future developments on any industrially rezoned land should mitigate any significant water quality impacts on Waitarakao / Washdyke Lagoon, and that future land uses at the site take into account the potential for land and water contamination.

#### Other notes

While the site is not listed on the Listed Land Use Register (LLUR), if the site is rezoned it may be added to the LLUR as a result of industrial activities undertaken on it.

In section 5.2.4 of the application, the applicant notes that the stopbank location on Planning Map 27 is incorrect and suggests correcting it using a minor amendment. We support this recommendation.

Given the high seasonal water table in the area, groundwater may be encountered during works at the site. The applicant has indicated that any dewatering will be in accordance with Rule 5.119 of the Land and Water Regional Plan.

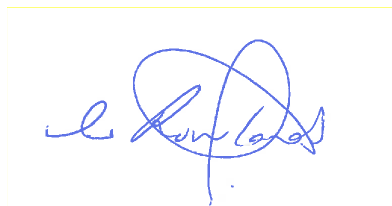
#### *Conclusion*

Before this proposed plan change is approved, appropriate steps should be taken to ensure no unacceptable adverse effects will occur in relation to water quality, aquatic ecosystems, cultural values, and the transportation system. We are happy to be involved in this process if needed, and trust that any necessary consent processes will also aid in achieving the desired outcomes.

#### **We seek the following decision from the territorial authorities:**

Environment Canterbury requests that if the territorial authority is of a mind to grant the plan change, they incorporate appropriate conditions to protect Waitarakao and to maintain the efficiency of the transportation system.

#### **Environment Canterbury does not wish to be heard in support of its submission.**



Carmel Rowlands

#### **Team Leader Planning**

(Authorised under delegated authority from the Canterbury Regional Council)

**Date: 7/06/2020**

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