

Daniel Levy — PPC28 RMA Hearing Submission / Presentation — July 2022



The Wrong Place for a New Green Field 'Suburb'

- Please see my written submission for details of my main objections.

- **Consideration needed for the people and entities that lack a voice:**
 - Biodiversity - Fauna and Flora
 - The Maitai river
 - Nelson's Future Generations

- Urbanization is incompatible with the need to preserve and enhance the Rural Green Belt amenity of the Maitai Valley.

Issues I will address today

Flood Risk

Preservation of the floodplain

Te Mana o Te Wai

Freshwater Policy

Earthworks

Vegetation Clearance – loss of Biodiversity

Any increased Flood Risk for downstream properties - Unacceptable

- Maitai River Flood Hazard – heavy rain plus big tides
- Increased flood hazard predicted with climate change



September 1970 – Flooding near the corner of Maitai Valley road and Nile st.

ABOVE—The Maitai River in full flood late afternoon Monday. The picture was taken from the Maitai Valley road just above the Nile Street bridge and across river.



December 2011 – Before and after the rain – Domett street

Increased Flood Risk from proposed PPC 28

- **Increased Runoff – Volume and Rates from Kaka Valley**
- Increase in Impervious surfaces
- Loss of vegetation
- Risk of cumulative impact

- **Proposed Filling of the Floodplain**
- Neutral Floodplain storage capacity?
- Inadequate modelling in SW Management report.
- Loss of floodplain storage likely to accelerate and raise Maitai River floodwaters increasing flood hazard for downstream properties.

Preservation of the Maitai/Kaka floodplain:

Maintain potential for future comprehensive floodplain restoration.
Further biodiversity restoration and flood management possible.

Prevent irreversible loss of fertile alluvial river terraces
Safeguard for possible future food production.

No realignment of Kaka Stream

No landfill or excavation on the floodplain

Riparian planting - should not be contingent on housing development.

Full support - start now!

More rapid establishment in natural undisturbed soil.

Te Mana o Te Wai?

NPS-FM 2020 - Te Mana o te Wai hierarchy of obligations.
Prioritizing the health and well-being of water first.

Scale of development proposed

Impossible to avoid, mitigate or reduce adverse impacts.

Water Quality and Hydrology

Urban contaminants- note NRMP Policy DO19

Earthworks – sedimentation and hydrology

Vegetation Clearance – Biodiversity loss and erosion

Earthworks

- Massive extent – Landfill, Roading, Building Sites, Infrastructure
- Permanent impact on Hydrology and Wetlands
- Sedimentation and Water Pollution
- Noise and Air Pollution
- Destruction of highly productive alluvial river terraces
- Loss of future restoration potential
- Devastating impact on biodiversity
- Rural Recreational Amenity and Safety
- Long Term (10 – 30 years)

Save The Maitai from this style of destructive greenfield subdivision

Note: Earthworks, Sediment and Noise.



Sep 2017

Bayview Special Housing Area prior to earthworks.
Expected yield: 125 Houses



Feb 2020

Bayview Special Housing Area
Vegetation Clearance mostly complete
Mature trees removed in North and East



STAGE 1 – PLANNING – Pre Development - 2017

STAGE 2 – VEGETATION CLEARANCE complete - 2020

STAGE 3 – EARTHWORKS in progress – 2022

PPC28 would require a much greater scale of destructive earthworks.

This style of development is inappropriate for the Sensitive Receiving Environment of the Maitai Valley.

Jan 2022

Bayview Special Housing Area
Earthworks in progress





Kaka Valley 2/2019

Note: 24Ha area of hill pasture and hill tracks in 2019.
Trees and regenerating bush providing biodiversity corridor to Maitai Valley



STAGE 1 – PLANNING – Pre Development – 2/2019

STAGE 2 – VEGETATION CLEARANCE - 1/2022

Impact on Biodiversity Corridors, landslips and erosion, increased flood risk and sedimentation.

STAGE 3 – EARTHWORKS? – not acceptable at the scale required for the proposed development.



Kaka Valley 1/2022

Note: 100 Hectares of cleared hillside in January 2022
76 Ha cleared since October 2019

Google Earth

Image © 2022 Maxar Technologies

800 m

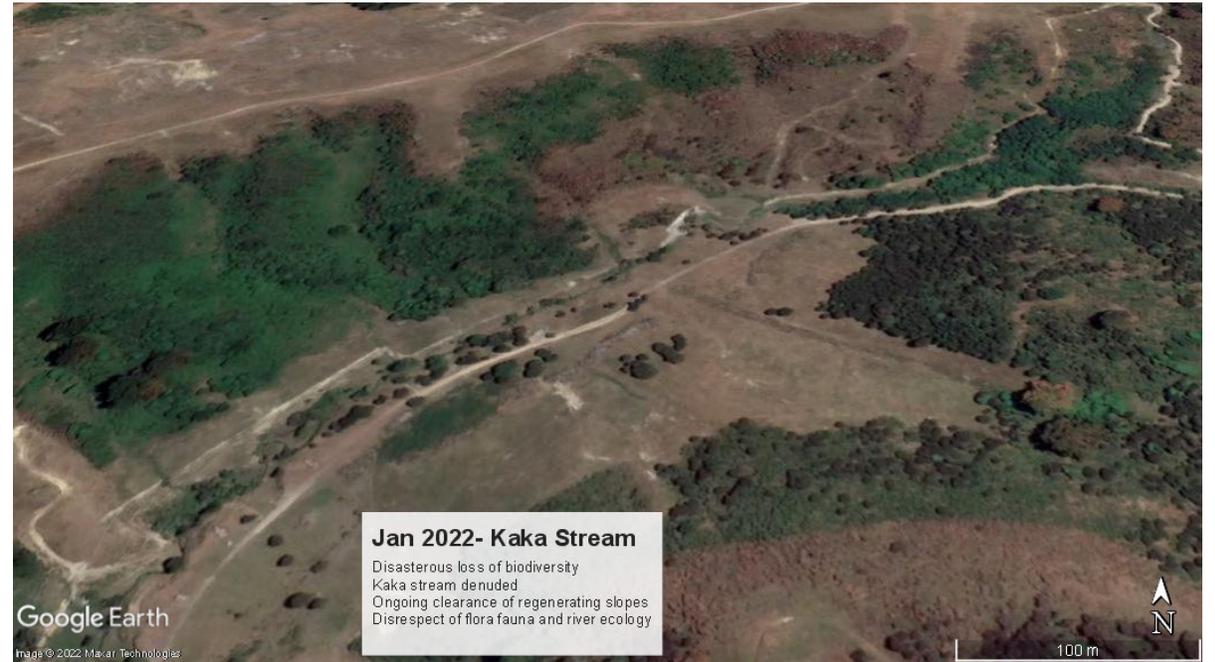
Kaka Stream – Biodiversity Lost

Disingenuous to propose revegetation as an offset to balance increased flood risks. Cleared regenerating bush far exceeds proposed revegetation areas.

February 2020



January 2022



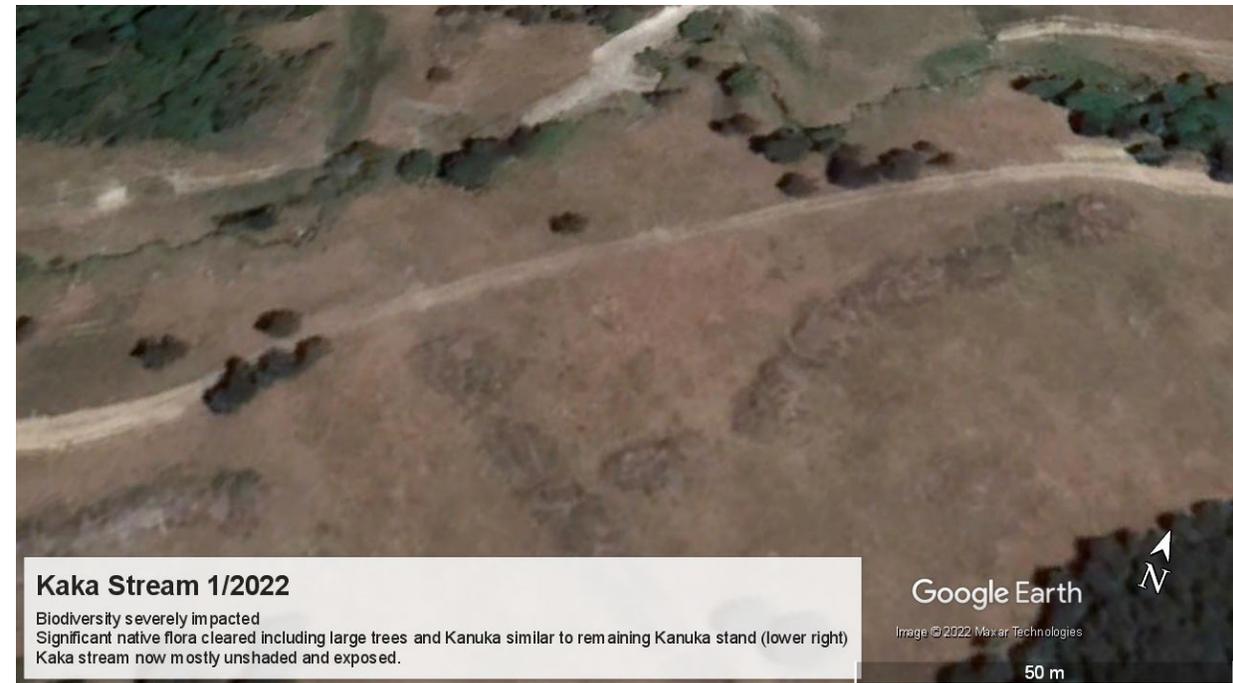
Kaka Stream – now denuded and unshaded

Which start point should have been used for environmental assessment of impacts?
Environmental Values and Intensions?

Feb 2020 – Rich Biodiversity corridor

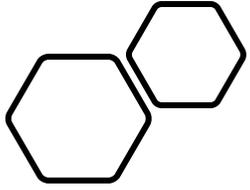


Jan 2022 – Biodiversity severely impacted



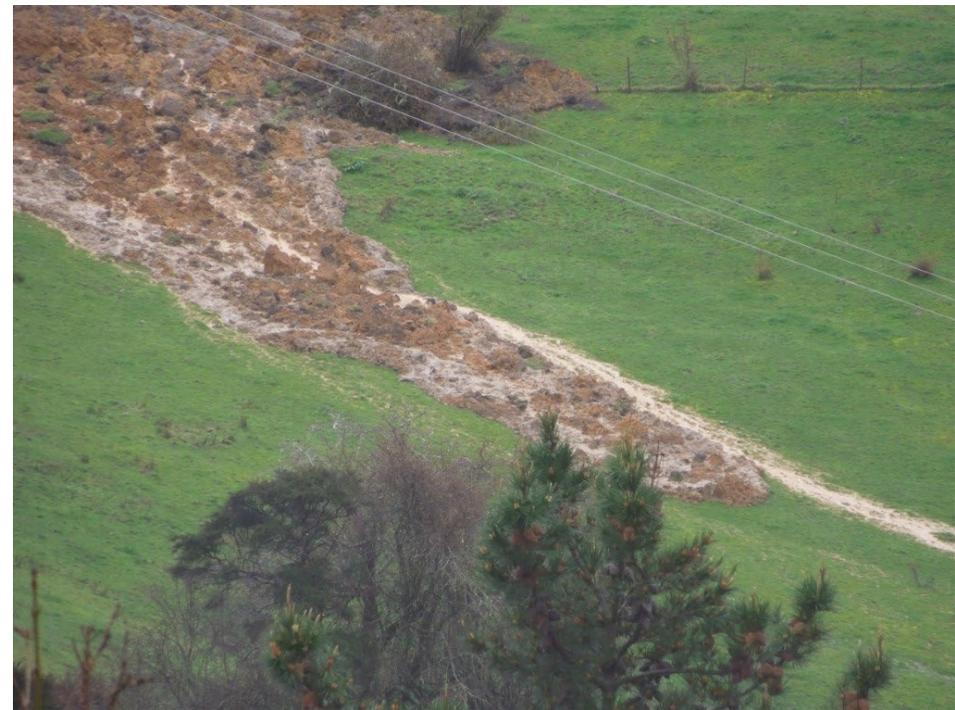
RMA - Proposed Policy RE6.3 Sensitive Environmental Design

- Ensure subdivision and development enhance freshwater and terrestrial ecological values through:
- Promotion of land management which minimises nutrient loss and does not accelerate soil erosion.



Landslips, erosion and sediment

Landslip August 2021



Reasons I oppose PPC 28 detailed in my written submission:

- 1. Maitai Valley's treasured rural character and amenity threatened.
- 2. Lack of robust public consultation supporting Urbanization of the Maitai.
- 3. Disrespect for our treasured Maitai River – Te Mana o te Wai?
- 4. Contaminated stormwater.
- 5. Inconsistent with water quality policy.
- 6. Sedimentation and Earthworks.
- 7. Flooding.
- 8. Whole of catchment – affects and connections.

Keep The Maitai Valley Rural

RELIEF

1. Decline PPC 28
2. If approved:
 - a. Preserve the Maitai/Kaka Floodplain (no land fill or excavation)
 - b. No realignment of Kaka Stream.
 - c. Keep the Kaka/Maitai Valley zoned RURAL
Suggest minimum lot size: 1 hectare. Maximum no. of lots: 50
 - d. Covenants to prevent further subdivision to preserve rural amenity
 - e. Permit some North facing land to be rezoned RESIDENTIAL
 - f. No through road linking SH6 to The Maitai Valley