

**Whiskey Creek Plan Change
Oral Submission in Support of Submission No 21.**

Good morning Mr Chairman and Councillors.

My name is Judy Milne and I speak to Submission 21, which expresses concerns over versatile soils and flooding issues in the Whiskey Creek Plan Change.

Versatile Soils

1. Insufficient weight has been given to the requirements of Objective 3-4 and Policy 3-5 in Horizons' One Plan.

Objective 3-4 is "To ensure that territorial authorities consider the benefits of retaining Class 1 and 2 versatile soils for use as productive land when providing for urban growth....." and Policy 3-5 "in providing for urban growth territorial authorities must pay particular attention to the benefits of retaining Class 1 and 2 versatile soils for use as productive land....."

Yes, a soil analysis was provided, but no further investigation was done for consideration to help meet these requirements.

This was done for the Manawatu Urban Growth Study in the late 1970s, which concluded that the conversion of land in the South West Extension, which included the Flyers Line area, would cost the nation the greatest foregone income of any other growth option. This land had the potential to return 95% more income per hectare than the land at Aokautere and 40%-50% more than other growth options.

Of course, these figures are well out of date, but they are based on the potential capacity of the soils, not the actual, and they do indicate a stark difference between growth options. I am not aware of other studies which have that detail.

2. It could be said that this Plan Change relates only to a small parcel of land, but cumulative effects need to be considered.

Map 2, prepared in 1977 by J.D.Cowie of the Soil Bureau of the DSIR, in conjunction with W.L. Osborne from the Ministry of Agriculture and Fisheries, shows the value of the soils surrounding Palmerston North.

The bright yellow shows the areas of high actual value for food production (Class 1). The light yellow shows the land with high potential value for food production (Class 2). You can see that the Palmerston North urban area already covers considerable parts of this land, and the PNCC is planning to earmark a further 842 ha for urban purposes. Much of the remainder is either zoned floodway or floodable area.

The orange colour shows the areas of moderate actual or potential value for food production.

Another map (not presented here) shows the soil limitations for urban use.

Put together, the most suitable areas for urban growth are demonstrated (Map 4) – soils of flat or rolling land, not of high actual or potential value for food production, and with only slight to moderate limitations for urban use.

3. Cumulative effect is a matter for consideration in the National Policy Statement on Versatile Soils.

Ministers will make final decisions on this policy at the end of next month, and if passed by Cabinet will be gazetted soon afterwards.

This National Policy Statement gives a clear indication of the way councils should view urban development, and it is difficult to see how the intent of the Statement can be disregarded, as both the applicant and Mr Asgar (P. 51, 4.30) have done in this case, given the increasing urgency to protect New Zealand's rapidly decreasing areas of our best food producing soils.

Flooding Issues

1. Until recently I have spent most of my life on land within the Manawatu Drainage Scheme, downstream of the plan change request, so I was concerned that there was little in the plan referring to the effects on this scheme, apart from the DHI assessment, P9, which states that option 6 keeps "the impact on the downstream area as minor or less than minor". There was no definition as to the extent of "downstream".

Then there was also concern when I read (Preston, P2, 2.4) that Horizons had agreed with the applicant that "an increase in flood levels of not more than 50mm in the presently rural areas and in particular areas south west from the plan change request and outside of the Palmerston North city boundary is considered less than minor".

50mm can make a difference as to the area flooded or whether water enters a building or not. The Kairanga School is an example. Flooding has never been a problem until more recently. Now water from Whiskey Creek builds up further along Rongotea Road. In 1988 floodwaters came suprisingly close to the school with staff lifting books just in case. In 2015 sandbagging was required at the school, and water flowed into the storage area under the stage of the hall next door. Two neighbouring houses were surrounded. 50mm more could have resulted in a worse outcome.

2. Farmers and landowners downstream have always dealt with floods, but more water has been pushed on to them as further development has occurred upstream. Mr. Bell has confirmed this in his evidence, (P5,55) - "I would assess any increase in volume of discharge into the Manawatu Drainage Scheme will have more than minor effects given the level of cumulative effects that have resulted from existing developments".

Farmers have always come second to city interests.

In 1976 the banks of the Mangaone Stream were artificially breached to save the city, and water flowed into Whiskey Creek. The downstream farmers were not notified. It was only the barking of the farm dog at 4.00am that alerted my husband that cattle and sheep had to be swum out from near Whiskey Creek.

Now there is a spillway and the system is more controlled, but the interests of the downstream landowners have not been fully considered by the applicant.

Mr. Preston noted (P3 3.2) “significant weaknesses in the applicant’s evidence (DHI 2019) assessing that the regional flood risks from the proposed development concept is less than minor”.

3. Mr Preston also noted (P9, 4.13) “A single flood event has been modelled. The modelled flood event is unlikely to show the worst case in terms of downstream effects”.

The landowners know this is correct. Every flood event is different. Rain falls on different areas at different rates for different lengths of time. Banks breach. Overtopping occurs when the model doesn’t reflect reality. Culverts can block. Crops, particularly maize, can divert water, grass and debris can build up along fence lines causing a damming effect. Every new seal on a road raises the level, causing more water to bank up behind it. In every flood something doesn’t go according to plan.

4. Mr Preston concludes that (P14, 5.1) “..... there is little evidence that the applicant’s currently proposed development concept will be close to acceptable and that until improved modelling and reporting is completed, the applicant carries a significant risk in that material changes may be required.....”.

I have been told that a number of years ago Plan Change 14, relating to development at Aokautere, required so many changes that the Environment Court ruled that the plan change had to be re-advertised.

The applicant and the Council would not want that to happen.

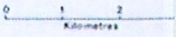
6. Given the uncertainties and objections relating to this plan change request a precautionary view needs to be taken. Too much is being left to the resource consent stage. There is no functional necessity to locate a residential subdivision in this floodable area (ref One Plan Policy 9-2 b iii), and “flood hazard avoidance must be preferred to flood hazard mitigation” (9-2 c).

I therefore request that the application for the Whiskey Creek Plan Change be rejected.

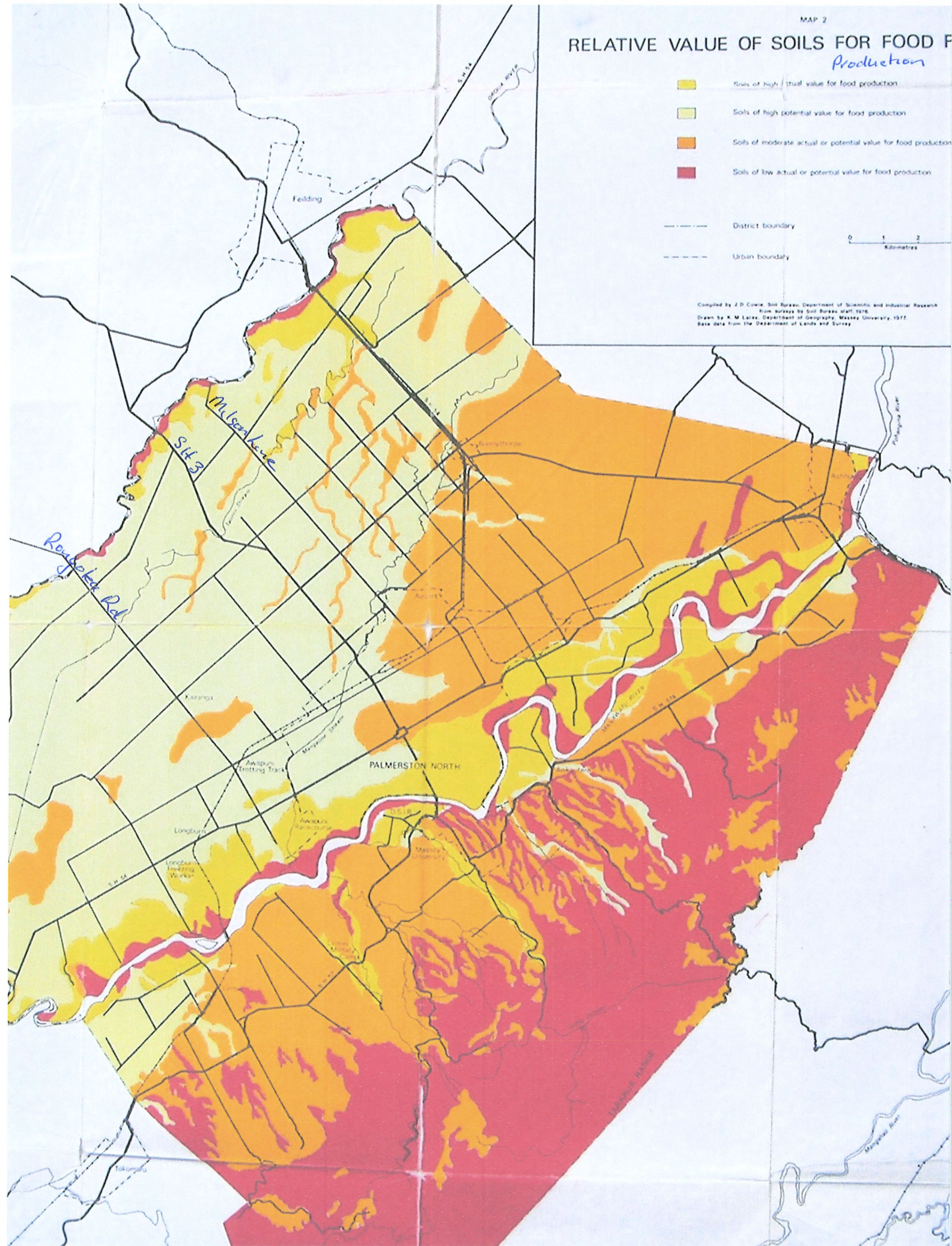
RELATIVE VALUE OF SOILS FOR FOOD PRODUCTION

- Soils of high actual value for food production
- Soils of high potential value for food production
- Soils of moderate actual or potential value for food production
- Soils of low actual or potential value for food production

- District boundary
- Urban boundary



Compiled by J. D. Cowie, Soil Bureau, Department of Scientific and Industrial Research
 from surveys by Soil Bureau staff, 1976.
 Drawn by K. M. Lacey, Department of Geography, Massey University, 1977.
 Base data from the Department of Lands and Survey.



Soils and Urban Use

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Soils of flat and rolling land, not of high actual or potential value for food production and with slight to moderate limitations for urban use

- District boundary
- - - - - Urban boundary



Compiled by J. D. CUMM, Soil Bureau, Department of Scientific and Industrial Research from surveys by Soil Bureau, 1940-1976
Drawn by K. M. LEICHER, Department of Geography, Massey University, 1977
Base data from the Department of Lands and Survey

