

## Final Draft Submission

The application before this panel is seeking to have High productive rural land in a flood Hazard 2 area, re-zoned for housing.

I am Margaret Henry, resident of Outram oppose this application: and I will speak about:

- \* The Land, its high value land and the need to protect it, and residential capacity

- \*The Two Waters, wastewater and stormwater. Outram has no reticulation for these and a high density of septic tanks.

- \*Climate Change: CC is the elephant in the room and has not been addressed by the applicants in their evidence and the land being considered for re-zoning is in a flood hazard area.

### **Climate Change and the associated increased risks especially flooding**

It is really important that considerations of CC are used to guide the decision making process. The effect of rezoning land for housing that is in a flood hazard area will be felt for generations to come as CC worsens and the likelihood of a 1 in 100 year flood increasing by 33% by 2050.

National Emergency Management Agency report that floods in NZ are the #1 hazard in terms of frequency, losses and declared civil defence emergencies. Since 1963 70% declared emergencies have been flood related.

ORC has a report from NIWA on climate change projections for Otago:and these include

Temperature changes will increase with time and emissions leading to extreme rainfall events, more severe in the future, floods are expected to be larger..

Core Logic says Otago has one of the highest flood risk concentrations in the country.

No one needs reminding of the floods last week in Nelson and before that Westport and Ashburton, Marlborough. I was in Outram in 2017 when there was flooding in the new Anzac subdivision and other areas of Outram, the township was cut off and people were evacuated and there was damage to the floodbank.

### **Land, the application covers Highly Productive Land**

The way we use land now has far reaching implications for the future of our community and generations to come. Our built environment is designed to last for a long time and once land is lost to housing it is lost forever to food production.

Already in the years 2002 to 2019 the amount of HPL available for agriculture DECREASED by 54%.

This urban creep into rural land from urban expansion has reduced the size of HPL areas making them unattractive for commercial production. Supermarkets prefer to deal with large growers and so on the Taieri, smaller growers have been squeezed out.

The applicant states that the HPL is only a small % and now the Outram land is not being used for market gardening, is

dismissive of it stating is only useful for rural support operations. But the loss of HPL is happening all over the country, more reason for us to preserve what we have.

Leaving it for rural support purposes is better than losing it forever to housing.

UN and FAO, MPI have warned that rising temperatures, increasing frequency of adverse events will reduce horticultural and agricultural productivity and NZ is not immune. We need to protect this land for our own food security.

The DCC has made a submission to the National Policy Statement of HPL: emphasising retaining HPL for growing produce as this aligns with the Strategic direction of the 2GP, the Dunedin towards 2050 Spatial Plan, the DCC energy Plan and Good Food Dunedin

Sadly, there is considerable incentive for current land owners to sell the HPL resource as the land will fetch a higher price by selling for housing, particularly if the land is near the urban fringe.

### **Residential Capacity**

The applicants say there is a demand for housing in Outram. However they are basing this assertion on the speed of section sales in recent developments and feedback from REA. The latter have only provided anecdotal evidence and I see no research that supports their statements. Unlike Kiwibank whose statement yesterday is based on research: that with net migration in the red and construction busy, there are the right conditions for a housing surplus in 12 months time.

As to the speed of sales, I note they had marketing assistance from a website with lovely photos of Maungatua, minus the

smog, and described the Maungatua View as premium residential, with rural views, surrounded by farmland, city-style living, a quiet country lifestyle yet close to the pulse.

Ironically, the applicants and the landscape architect rate the rural character and the amenity value is low so the rating seems to depend on whether or not the land is for sale.

As stated in their evidence, the rural and open character of Outram will change to a suburban one. There have already been 3 developments in Outram in less than 20 years substantially increasing the size of the township.

But I didn't come to Outram to live in the suburbs. As a sop to distressed residents of Outram who feel as I do, the developers mention plantings and an enhancement of the ox bow landform.

I remind the panel this is where some 70% of Outram's stormwater ends up and there is no map or diagram provided as to where exactly these *enhancements* would be. Also this area is covered by ORC Flood Protection Management bylaw where nothing happens there without their permission. No planting, nothing. There is no mention of the ORC or any contact with them re this area.

## **Two Waters**

The site is a flood hazard area and a 'hotspot' for septic tanks said the ORC in a report 2015, There's no reticulation in Outram and the smaller version of this development would add another 73 septic tanks, plus there are the ones from the 3 recent subdivisions.

That raises concerns about groundwater contamination as the risk of contamination is directly proportional to the density of the septic tanks and the risk then was rated *by the ORC* as medium in 2015.

In July 2020 the Water NZ website reports there was flooding in Northland and the flooding entered septic tanks and flushed out raw sewage onto parks and a school playground. I live in Outram, this worries me.

**Now in relation to hazard risk and climate change in a particular clause in *the RMA that says:***

***that new residential zoning and potential risks from natural hazards and from the potential effects of climate change on natural hazards are no more than low.***

The DCC say the risk of the area in the application is medium. But the DCC and the applicants are not on the same page.

Their engineer says it could be low or medium but has opted for low as long as there is mitigation in the form of flood protection work. Stormwater design would be required whether the risk was low or medium. An addition to minimum floor levels may be required. The stormwater assessment would take place at the time of subdivision – far too late!

As to the mitigation measures he is putting so much faith in,

I remind the Panel that we have tried that and it didn't work. In the flooding of 2017, the mitigation strategy of raised floor levels was about as effective as King Canute and did not

prevent water entering homes in the Anzac subdivision, and the floodbank was damaged.

The damage to the floodbank requires considerable repairs. From the ORC website: the Outram floodbank experiences seepages during high river flows. Seepage may threaten the integrity of the floodbank in the long run and they will fix this

by extending the stopbank toe with a weighting blanket, sealing or replacing culverts, constructing bottom stormwater drains, other measures.

Another mitigation strategy proposed by the applicants is storm water attenuation: There is no clear information about how they propose to do this: ponding? Tanks? There is no stormwater assessment yet as to quantity or where ultimately would this end up? – likely in the oxbow area, as yet unassessed. There is no reticulation system to remove it from Outram, nor plans nor funding to build one.

And this is the flood protection and the mitigation strategies on which the applicants state the risk level is low. The DCC and the applicants are not on the same page as to risk level Is it Low? Is it Medium? The risk level needs to be carefully and accurately assessed, taking a precautionary approach is essential, and not one based on hope as the potential effects of misclassification when flooding is the #hazard in NZ, could be dire.

Certainly a low risk category is helpful to the applicants as they are then able to state that the condition of that clause is met.

The onus is on the DCC to use the powers they already have. The National Adaptation Plan has strategies to help us in an uncertain future: **before** mitigation or managed retreat comes **avoidance**. Stop building in flood hazard areas. Stop putting people in harm's way.

New climate analysis from Core Logic shows a \$100M average annual cost of river flooding to residential buildings in NZ.

After the flooding in Nelson last week the insurer IAG was forthright: building in flood prone areas has to stop.

After the flooding in Outram in 2017, the then Mayor Cull and CEO Bidrose said the Council needed to think about development on the Taieri, where people would put subdivisions, and what was an appropriate use of the land. 2017 !!

Its now 2022 and this is a hearing about permission to do exactly those things we have been warned about. We have heard this before. When will we listen? When will this stop? Who will say no?

Panel, if not you, then who? If not now, then when? Or is . Is this another forum for so much blah, blah, blah ?

## **Conclusion**

Application for such large development

on the edge of Outram, the urban creep, the loss of HPL, the flood hazard, no reticulation, too many septic tanks, no public transport - must be denied

As stated by the DCC in their own submission, this proposed development does not align with the DCC Strategic direction of the 2GP, the Spatial Plan, the DCC Energy Plan, Environment Plan, Carbon Zero by 2030, the DCC submission on the National Policy Statement on HPL,

*And the DCC declared a climate emergency in 2019.*

If we keep doing what we have always done we will get what we have always got, only now, with CC that could be more than we bargained for.

No public transport, houses can and should be built elsewhere, demand for sections

Other reasons for refusing this application:

Outran has not public transport #36Commuter run families, safety FENZ, Medical centre Vision for Dunedin – transport plays a key role in making Dunedin a sustainable and resilient city

Traffic movements, not just for work and study

Carbon miles for food

Size of the dev

Liveable city

Rural centre #36