

Friends of Bullock Creek Spoken Submission on Proposed Variations to the QLDC District Plan – Urban Intensification Plan (UIP)

Presented by: Nancy Latham

Date: 26th August 2025

Introduction

My name is Nancy Latham. I am a permanent resident and long-time property owner on the banks of Bullock Creek in Wānaka, with family ties to the area since the 1980s. I am also a Guardian of Lake Wānaka, and a past President of Friends of Bullock Creek (FOBC).

I am speaking on behalf of the Friends of Bullock Creek to their written submission (2023) on QLDC Urban Intensification Plan (UIP). In doing so, I am also giving voice to Bullock Creek and the vulnerable groundwater aquifer beneath Old Wānaka.

Friends of Bullock Creek was established in 2016 and has a very strong community mandate to protect, restore and enhance the public amenity and the environment of Bullock Creek from head waters to its entry point into Lake Wānaka. Community volunteers actively support this mandate in both restoration and advocacy.

Bullock Creek is a unique multi-spring fed creek which drains from the Cardrona aquifer and runs through the heart of Wānaka including the CBD and the residential part of old Wānaka.

Summary of FOBC's written submission and Position

1. FOBC Support the Urban Intensification Plan in Principle

FOBC supports urban intensification where it promotes efficient land use, reduces urban sprawl, and protects greenfield areas.

2. Conditional Support Based on Infrastructure Readiness

However, FOBC do **not support** the proposed QLDC Urban Intensification Plan as currently drafted, due to a lack of appropriate infrastructure provisions, particularly around stormwater management and surface and groundwater protection.

Alternative brown fields, including Three Parks, are available to meet the medium term demands for Urban Intensification to support projected population growth.

Key Environmental Concerns related to the proposed intensification of the built environment in Old Wanaka.

Stormwater Infrastructure:

- **Old stormwater assets are outdated.** Much of Old Wānaka's infrastructure is at least 50 years old and was not designed to support the proposed intensified urban development. This is compounded by deferred QLDC investment in asset maintenance and upgrades of existing stormwater infrastructure.
- **Recent QLDC investment in new stormwater assets has been inadequate.** Delays in upgrading key infrastructure to support new urban development has left freshwater bodies, including Bullock Creek, vulnerable to stormwater contamination.
- **Stormwater treatment is currently minimal.** Contaminated stormwater runoff from roads and impervious surfaces — which includes heavy metals, hydrocarbons, fertilizers, and other chemicals—enters Bullock Creek and Lake Wānaka untreated. Quantities of contamination will increase with intensification of Urban Dwellers in Old Wanaka.

Water Quality and Ecosystem Health

- Bullock Creek is now the **most polluted freshwater creek** in the Upper Clutha Rohe (ORC, 2023).
- **Roy's Bay has been closed to swimming multiple times** due to E. coli contamination from stormwater.
- The **Ministry for the Environment has downgraded Lake Wānaka's water quality** from "Excellent" to "Good"—a serious warning sign.

Therefore, FOBC believes that QLDC's Stormwater infrastructure assets are not fit for purpose to protect our freshwater bodies with the generically defined urban intensification directive.

Reading through the QLDC documentation supporting this Urban Intensification variation raises questions with FOBC as to how well informed this variation is in terms of a comprehensive understanding of the environmental landscape and the physical natural capital limitations to support urban intensification.

Threats to the Groundwater Aquifer

- Past Urban development involving deep foundations and dewatering has already **compromised the aquifer** below old Wanaka. This structural damage to the aquifer caused lowering of local spring levels and Bullock Creek and raised concerns about land stability.
- This highlights that the **hydrological flows** between the aquifer, Bullock Creek and natural springs, are interconnected, and the scope of connection is **largely unknown**. As documented in expert witness statement 198 (1)
- This damage to the groundwater aquifer changed the hydrological flow of Bullock Creek, and potentially, had a negative effect on its ecological health.
- Bullock Creek's provision of **ecosystem services** is dependent on its ecological health. Compromising the natural state of Bullock Creek will compromise Bullock Creek's ability to support local flora, fauna, and aquatic life forces; as well as reduce the provision of cultural and social ecosystem services for the Wanaka Community.
- This 2010 development on Warren Street now requires **permanent pumping (dewatering)** to prevent flooding. This system depends on uninterrupted electricity and undermines community resilience.

The **cumulative effects** of similar developments as proposed in Urban Intensification in Old Wanaka, where deep structural foundations penetrating the aquifer are required, could further deplete spring and creek flow levels, and cause localised issues with land stability for local property owners.

Further to this, there is no scientific evidence that the cumulative effects of urban development requiring deep foundation structures, on the Aquifer, will not **extend** beyond the boundary of Old Wanaka. For example: The Wanaka Golf Course has historical water rights and changes in the Aquifer levels below the golf course could have a negative impact on their operations and financial resources.

Key Gaps in QLDC's Plan

1. **No clear recognition of environmental thresholds**—particularly for surface water and groundwater.

2. **Lack of cumulative impact assessments**—especially regarding deep foundations, dewatering, and aquifer pressure.
 3. **Insufficient regulatory safeguards**—no provisions to mitigate irreversible damage to the aquifer or Bullock Creek.
-

Recommendations and Requested Provisions

If QLDC decides to proceed with Urban Intensification of Old Wanaka, rather than focusing on alternative brownfields, FOBC request that QLDC to adopt **specific provisions** in the UIP that:

1. **Require infrastructure upgrades before intensification proceeds.**
 - Urban development should be contingent on stormwater systems that can adequately treat runoff before it reaches Bullock Creek or Lake Wānaka.
 2. **Establish a protective corridor or overlay around Bullock Creek and the aquifer.**
 - This should limit or restrict sub-surface construction in areas where the aquifer is shallow or vulnerable.
 3. **Mandate cumulative effects assessments** for developments requiring deep foundations or dewatering.
 - This includes both environmental and geotechnical risks, such as land stability and spring depletion.
 4. **Recognise the "unknown" as a valid reason for declining consent.**
 - Where the risks to Bullock Creek, Lake Wānaka, or the aquifer cannot be confidently mitigated, consent should be declined under the precautionary principle.
 5. **Encourage brownfield development in suitable areas such as Three Parks.**
 - Intensification there avoids many of the environmental risks associated with Old Wānaka's sensitive landscape.
-

Conclusion

The Urban Intensification Plan is required to be consistent with the **Resource Management Act (RMA) 1991**, Part 2: the Principle and Purpose, which is still current law, and its requirement to:

- Safeguard the life-supporting capacity of air, water, soil, and ecosystems; and
- Avoid, remedy, or mitigate adverse environmental effects.

If urban intensification damages the ecological health of Bullock Creek and the aquifer beneath Old Wānaka, that damage may be **irreversible**. As my daughter recently said:

"Damaging the aquifer should be a **never event**."

Future generations are already watching us, and they are perplexed by our reluctance to make to decisions which respect and protect our natural environment.

We urge QLDC to take a leadership role in environmental stewardship by embedding strong, enforceable protections for Old Wanaka into the Urban Intensification Plan.

(1) Supporting document: publicly available expert witness (Neil Thomas) submission (4th July 2025) on the QLDC UIP Submitter 198