



Te Taumutu Runanga

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PO Box 3214, Christchurch

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23 September 2015

Planning Department
Selwyn District Council
PO Box 390
Rolleston 7643

Tēnā koe,

**Re: Submission on proposed Plan Change 46: Gillian Logan - Living 2A (Deferred),
160 Bangor Road, Darfield**

Please find attached a submission lodged by Te Taumutu Rūnanga to proposed Plan Change 46.

Please contact Lisa MacKenzie on 03 9740163 if any other information is required.

Nāku noa, nā


Julie Robilliard
Chair
Te Taumutu Rūnanga.

To: Selwyn District Council
PO Box 390
Rolleston 7643

Name of submitter: Te Taumutu Rūnanga

1. This is a submission on proposed Plan Change 46: Gillian Logan - Living 2A (Deferred), 160 Bangor Road, Darfield.
2. The submission is made by Te Taumutu Rūnanga
3. The submission relates to the whole of the application as outlined in **Appendix A**.
4. Te Taumutu Runanga could not gain an advantage in trade competition through this submission.
5. Te Taumutu Rūnanga is directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.
6. Te Taumutu Rūnanga neither supports or opposes the application.
7. Te Taumutu Rūnanga wishes to be heard in support of its submission.
8. Address for service and contact name:
Lisa MacKenzie
PO Box 3214,
Christchurch
Ph 03 9740163
Email: Lisa.MacKenzie@ngaitahu.iwi.nz

Signed for and on behalf of Te Taumutu Rūnanga



Julie Robilliard, Chair

Date: 23 Sep. 15

Appendix A

Introduction

1. This submission is made on behalf of Te Taumutu Rūnanga.

There is support for the communities ability to grow, however it needs to be undertaken in a sustainable way considering the effects of the proposed plan change as a whole, so cannot support the application in its current format.

The proposal

2. Te Taumutu Rūnanga understands that proposed Plan Change 46 is to change to the zoning status of the site from Living 2A (deferred) to Living 2A.

Consultation and consideration of cultural values

3. Mahaanui Iwi Management Plan 2013 (M.IMP) is an expression of kaitiakitanga and rangatiratanga. It is a manawhenua planning document reflecting the collective efforts of six Papatipu Rūnanga, including Te Taumutu Rūnanga.
4. The M.IMP provides a values-based statement of Ngāi Tahu objectives, issues and policies for natural resource and environmental management that is aimed at the protection and enhancement of Ngāi Tahu values, and for achieving outcomes that provide for the relationship of Ngāi Tahu with natural resources across Ngā Pākihi Whakatekateka o Waitaha / the Canterbury Plains and Te Pātaka a Rākaihautū / Banks Peninsula. The plan enables external agencies to understand issues of significance to tāngata whenua, and how those issues can be resolved in a manner consistent with cultural values and interests including:
 - Embracing the practice of ki uta ki tai, which recognises:
 - i. the connection between land, groundwater, surface water and coastal waters and
 - ii. the holistic nature of traditional resource management.
5. While it is noted in the application that parts of the M.IMP have been considered, it did not consider the M.IMP as a whole. For example two policies were considered relevant to the proposed change, however water supply, stormwater, and wastewater etc are also relevant. Therefore the plan change must consider entire M.IMP and the effects of the proposed plan change as a whole. Any decision should be consistent with the M.IMP when considered as a whole.

Water supply

6. The water supplied from the community wells is from with the Selwyn-Waimakariri Groundwater Allocation Zone under the Canterbury Natural Resources Regional Plan (NRRP) and the Selwyn-Waimakariri Allocation Zone under Plan Change One of the Canterbury Land and Water Regional Plan (PLWRP). Both zones are considered to be over-allocated.
7. Issue WM8 of the M.IMP notes that freshwater resources in the taiwakā are over-allocated and has significant effects on a number of values including Mauri, the ability

of groundwater resources to resources to replenish and recharge for on-going use and future generations; and the flows of lowland spring fed streams.

8. Policy WM8.2 and 8.6 of the M.I.M.P requires protection of a number of factors including ensuring certainty for ground water recharge, including higher recharge rates versus abstractions; protection of aquifer recharge and groundwater quantity.
9. While this is an application to change a District Plan, the effects of allowing further subdivision will result in an increase in community takes from the area adding additional pressure on an over-allocated groundwater resource.
10. The Selwyn District Council has advised the applicant they could service water to the properties at 2000 L/day. The applicant has asked for more. This would not be supported as the M.I.M.P advocates for the efficient use of water and there is concern regarding the effects of taking more water on the groundwater resource. It is also noted that in other areas (outside the district) 2000 L/day or smaller are supplied from community supply (including lifestyle blocks over 1 ha). Nor does that applicant explain (other than larger property size) more water would be needed or how it could be used efficiently.

Water Quality

Wastewater

11. Water Quality is an important issue for Rūnanga and the community. This is reflected in the M.I.M.P, particularly policies WM6.1-WM6.18. The Darfield area currently does not have its own community wastewater system, despite the growth of the township and surrounding area. While the Rūnanga would prefer to see the effects of an activity managed on site (and not beyond the property boundary as per the M.I.M.P), given the size of the township it is considered that the effects of wastewater would be better managed as a community system than as individual wastewater systems (as proposed) especially given the over-allocated status of the water quality (in the district) under the regional plans.
12. By allowing this Plan Change with the use of individual systems there is the potential that the effects of the plan change will be greater than anticipated on water quality as a result of the increase in wastewater systems in the area.

Stormwater

13. Stormwater will be dealt with on site and mainly discharged to land. The M.I.M.P encourages the recycling of water to reduce the effects on groundwater resources, (as discussed above). There is also the potential for stormwater to enter the watercourses through the property from roads etc, and groundwater resulting in effects on water quality.
14. As with the wastewater system, it is considered that given the size of the township stormwater should be treated at a community level rather than to ground at individual sites.

Te Taumutu Rūnanga requests that the consent authority make the following decision:

15. While Te Taumutu Rūnanga is generally supportive of community growth, we are unable to support the application in its current form.
16. If the decision makers are of a mind to grant proposed Plan Change, Te Taumutu Rūnanga considers that it should be consistent with the Iwi Management Plan and take into account the points above.