

Notice of Submission on Proposed Plan Change 60

Resource Management Act 1991 - Form 5

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This is a submission on proposed Plan Change 60

We oppose part of the application. The specific part of the application that our submission relates to is the preferred wastewater servicing method of individual on-site wastewater treatment systems. Environment Canterbury strongly encourages the provision of reticulated wastewater services for new residential development.

The reasons for our submission are:

Canterbury Regional Policy Statement Direction

There are various directions in the Canterbury Regional Policy Statement (CRPS) that seek that development is located and designed in way that achieves consolidated and co-ordinated urban growth that integrates with the provision of infrastructure. The provisions in the CRPS relevant to this submission are in Chapter 5, Land-Use and infrastructure, for development in areas outside of Greater Christchurch.

The relevant provisions are:

- a) Objective 5.2.1(1) which seeks that development is located and designed so that it functions in a way that achieves consolidated, well designed and sustainable growth, primarily in and around existing urban areas.
- b) Policy 5.3.1 which requires rural residential development to occur in a form that concentrates, or is attached to, existing urban areas and promotes a co-ordinated pattern of development.

- c) Policy 5.3.2(1) which seeks to enable development which ensures that adverse effects are avoided, remedied or mitigated, including where these would compromise or foreclose options for accommodating the consolidated growth and development of existing urban areas; and the productivity of the region's soil resources through the further fragmentation of rural land.
- d) Policy 5.3.2 (3) which requires that development is integrated with the efficient and effective provision of infrastructure.
- e) Policy 5.3.5 which directs development to be appropriately and efficiently served for the collection, treatment, disposal or re-use of sewerage and stormwater and the provision of potable water.

The location of this proposed Private Plan Change (pPC60) is in an area that would consolidate growth around the existing township, but it lacks integration with wastewater servicing. Environment Canterbury acknowledges that there is currently no reticulated wastewater infrastructure in Kirwee and that recent investigations (commissioned by the Darfield and Kirwee Wastewater Working Party) have not detected any adverse effects on human health or the environment from the existing on-site wastewater treatment systems in the area. The cumulative effects from an increased density of on-site wastewater treatment systems, however, remain unknown.

Application of the Canterbury Land and Water Regional Plan

pPC60 addresses the lack of reticulated wastewater by recommending the use of individual on-site wastewater treatment systems. The application acknowledges that individual resource consents to discharge wastewater to ground will be required from Environment Canterbury for each new site. The costs of reticulation, depth to groundwater and capacity of receiving soils, are cited as the main reasons for preferring an on-site disposal method.

The application also acknowledges that intensified residential development using on-site wastewater systems does have the potential to contaminate groundwater in the future. Any cumulative environmental effects or effects on the quality and safety of human and animal drinking-water from these systems will be assessed as matters of restricted discretion on a case by case basis for any resource consent applications received by Environment Canterbury.¹ It is unknown if or when these effects would present an obstacle to obtaining resource consent.

The poor maintenance of existing on-site wastewater systems and the potential for system failure was a recurring issue identified in studies commissioned by the Darfield and Kirwee

¹ Restricted discretionary resource consent to discharge wastewater to ground will be required under rule 5.9 of the Canterbury Land and Water Regional plan because all of the new sites will be smaller than the 4 ha threshold condition in permitted activity rule 5.8.

Wastewater Working Party.² A precautionary approach to the unknown risk posed from an increased density of on-site wastewater systems would mitigate potential adverse effects, as well as avoiding potential legacy issues from a large stock of on-site systems, including the associated maintenance and replacement costs.

The availability of alternative wastewater disposal solutions

Site by site application for resource consent is not an efficient provision of wastewater infrastructure if there are viable alternatives. pPC60 indicates that there are at least six available alternatives for wastewater servicing should any individual on-site resource consent applications be refused in the future. The identified six alternative options are:

1. Low pressure wastewater system pumping to a centralised on-site community treatment and disposal system
2. Low pressure wastewater pump system pumping (downhill) to the existing wastewater treatment facility in Rolleston.
3. Gravity network with centralised on-site community system.
4. Gravity network with centralised pump station, pumping (downhill) to Rolleston.
5. Septic Tank Effluent Pumping (STEP) system where the liquid from on-site septic tanks is pumped to a centralised on-site community disposal system.
6. STEP system with liquid being pumped to the existing wastewater treatment facility in Rolleston.

Environment Canterbury's preference would be for the development of a reticulated sewer system capable of servicing the entire pPC60 area, which could ultimately be vested in the Selwyn District Council. Of the identified alternatives above, options 1-4 would be more preferable than 5 & 6, as the last two options will still present a residual risk from on-site maintenance at the cost of the landowner.

Environment Canterbury is also concerned that it would be inappropriate to service the pPC60 area with on-site wastewater systems ahead of any Selwyn District Council decisions on the future wastewater servicing for Kirwee and Darfield. Environment Canterbury is aware that the work of the Darfield and Kirwee Wastewater Working Party is ongoing, including further engagement and consideration on potential wastewater treatment options for the townships of Darfield and Kirwee.

It would be inefficient to switch from on-site treatment to reticulated treatment at an unknown point in time when regional resource consents might be refused. It would also be inefficient to pre-empt a preference for on-site wastewater systems if there is potential for a coordinated approach to wastewater infrastructure in these townships.

² Canterbury District Health Board, *Existing on-site wastewater treatment systems assessment in Darfield*, Sanitary survey summary report 2014; ESR, *Public health risk assessment of sewage disposal by onsite wastewater treatment and disposal systems in the Darfield and Kirwee Communities*, 2014

The decision we would like the Council to make is:

To establish a strategic and co-ordinated requirement for reticulated wastewater servicing of the pPC60 area before approving the plan change. This could be a requirement for the outline development plan to include reticulated wastewater servicing, or that a mechanism is in place to require a co-ordinated approach to reticulation at the time of subdivision. Environment Canterbury would welcome pre-application consultation for any reticulated wastewater proposal.

We do not wish to speak in support of our submission.

A handwritten signature in black ink, consisting of a stylized 'A' followed by a horizontal line.

Andrew Parrish

Planning Section Manager

(Authorised under delegated authority from the Canterbury Regional Council)

Date: 19/02/2020