



**Mahaanui
Kurataiao Ltd**
Manawhenua Environmental Services

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To: Brant Hammett c/o Adrienne Tisch

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Leeston Private Plan Change Application

Manawhenua Statement

Ngāi Tahu are tangata whenua of the Canterbury region, and hold ancestral and contemporary relationships with Canterbury. The contemporary structure of Ngāi Tahu is set down through the Te Rūnanga o Ngāi Tahu Act 1996 (TRoNT Act) and, through this structure and this Act, sets the requirements for recognition of tangata whenua in Canterbury.

Te Taumutu Runanga hold manawhenua over the project's location, as it is within their takiwā.

The natural resources – water (waterways, waipuna (springs), groundwater, wetlands); mahinga kai; indigenous flora and fauna; cultural landscapes and land - are taonga to manawhenua and they have concerns for activities potentially adversely affecting these taonga. These taonga are integral to the cultural identity of ngā rūnanga manawhenua and they have a kaitiaki responsibility to protect them. The policies for protection of taonga that are of high cultural significance to ngā rūnanga manawhenua are articulated in the Mahaanui Iwi Management Plan (IMP).

Assessment of Proposal

- The applicant has applied for a private plan change to rezone land for residential subdivision.
- The plan change seeks to rezone approximately 60 ha of land west of Leeston township from Living 1 (deferred), Living 2 (deferred) and Outer Plains to 42 ha of Living 1 and 19 ha to Living 2 to allow for a residential subdivision.
- The applicant plans to use the land for a residential subdivision which could accommodate approximately 410 allotments, comprised of 380 Living 1 allotments and 30 Living 2 allotments.
- The site is located west of the existing urban form of Leeston and is bound by Leeston Dunsandel Road to the north, with a small area lying north of this road.
- The site is prone to surface flooding and is also located within Environment Canterbury's Phosphorus Sediment Risk Area.

- The applicant undertook a preliminary site investigation which found evidence that the site could be contaminated from previous agriculture, contractor's yards and pre 1940s building.
- Birdlings Brook, a tributary to Waitatari/Harts Creek, runs through the site in the south west corner.
- The area subject to the Plan Change is bound by High Street to the south, Harmans Road to the west, Leeston Dunsandel Road to the north and residential activity to the east. A 5.4 ha land parcel lies north of Leeston Dunsandel Road.
- The applicant plans to use the land for a residential subdivision which could accommodate approximately 410 allotments, comprised of 380 Living 1 allotments and 30 Living 2 allotments.
- Services:
 - Wastewater: The Ellesmere Treatment Plant and reticulated wastewater services Leeston township. The applicant states that the plant has capacity to accommodate wastewater from the site. As the site is not currently serviced, and existing pipe networks terminate prior to the site, the pipe network would need to be extended to supply the site.
 - Stormwater: A stormwater basin will be required for the stormwater from new residential development, an area for this has been shown on the ODP as being in the naturally low-lying area of the site. Additional stormwater management within the Leeston Creek has been indicated i.e. stormwater ponds.
 - Potable water: The current water supply network in Leeston does not have capacity, and a new water source would be required. SDC have purchased a utility allotment within the site and are in the process of installing a bore for potable water supply.

Evaluation in relation to Mahaanui Iwi Management Plan (MIMP)

The matters that are relevant to this particular proposal have been identified as:

WM12.7 To require all esplanade reserves and esplanade strips established on subdivisions to incorporate native riparian planting.

P4.1 To work with local authorities to ensure a consistent approach to the identification and consideration of Ngāi Tahu interests in subdivision and development activities, including:

- (a) Encouraging developers to engage with Papatipu Rūnanga in the early stages of development planning to identify potential cultural issues; including the preparation of Cultural Impact Assessment reports;
- (b) Ensuring engagement with Papatipu Rūnanga at the Plan Change stage, where plan changes are required to enable subdivision;
- (c) Requiring that resource consent applications assess actual and potential effects on tāngata whenua values and associations;
- (d) Ensuring that effects on tāngata whenua values are avoided, remedied or mitigated using culturally appropriate methods;

(e) Ensuring that subdivision consents are applied for and evaluated alongside associated land use and discharge consents; and

(f) Requiring that 'add ons' to existing subdivisions are assessed against the policies in this section.

P4.3 To base tāngata whenua assessments and advice for subdivision and residential land development proposals on a series of principles and guidelines associated with key issues of importance concerning

such activities, as per Ngāi Tahu subdivision and development guidelines (see next page).

TW4.1 To require that the management of land and water in the Te Waihora catchment recognises and provides for the relationship between catchment land use, tributary flow, drain management, water quality, the coastal environment and the cultural health of Te Waihora.

TW4.3 To advocate for the development of an integrated surface water/groundwater/lake-water management plan for the Te Waihora catchment, recognising and giving effect to:

(a) Mauri and mahinga kai as first order priorities;

(b) The relationship between groundwater and surface water;

(c) The relationship between tributary water quality and flow and the health of Te Waihora; and

(d) Effects of land use on water quality and quantity, particularly farm run-off.

P10.1 The management of contaminated land must recognise and provide for specific cultural issues, including:

(a) The location of contaminated sites;

(b) The nature of the contamination;

(c) The potential for leaching and run-off;

(d) Proposed land use changes; and

(e) Proposed remediation or mitigation work.

Conclusion

The proposal was brought to the Taumutu Rūnanga representatives at a hui on the 27th of September 2019. Any activities that have a potential to effect Te Waihora in any way are of a high concern to Taumutu due to the significance of the lake. Various recommendations were made and are listed below.

Recommendations

Recommendation 1

That any future subdivision plans/consents within the area must be consulted on independently, as the location of the site presents a high risk to negatively impact water quality in Te Waihora.

Recommendation 2

Leeston is the nearest town to Taumutu/Ngāti Moki. However, there is an absence of manawhenua identity in the town. Development in this area presents an important opportunity to reflect cultural identity and values.

Recommendation 3

Any future developments within the area sought for rezoning should be undertaken in accordance with the Ngāi Tahu Subdivision and Development Guidelines, with a particular emphasis on water efficiency measures such as greywater re-use systems, and establishment of indigenous biodiversity. These guidelines could be integrated into the Outline Development Plan through rules and advice notes. For example, subdivision in the area could be a controlled activity with the integration of these guidelines as a matter of control.

Recommendation 4

If any new streets are to be established and named, Te Taumutu wish to be consulted and given an opportunity to provide names that reflect the history and values of the hapū

Recommendation 5

The rūnanga are concerned about the potential impact on waipuna, as there are several in the Leeston area. Canterbury maps only shows springs outside the plan change area, however, there may be unknown springs affected and this should be reflected in ongoing plans within the subject site.

Recommendation 6

The applicant should be encouraged to consider planting locally sourced indigenous vegetation to enhance indigenous biodiversity values on the area as part of landscaping (as appropriate)

Mahaanui Kurataiao and its staff are available to discuss this report further or assist in direct engagement with rūnanga if desired.

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