# Appendix I

# Mahaanui Kurataiao Ltd Statement

Mahaanui
Kurataiao Ltd

226 Antigua Street, Central Christchurch, Telephone: +64 3 377 4374 Website:www.mahaanuikurataiao.co.nz

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To

ATTN:
jeremy@novogroup.co.nz

**Private Plan Change Lincoln South**

**Report**

## 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.

The following Rūnanga hold manawhenua over the project's location, as it is within their takiwā:

- Te Taumutu Rūnanga

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 application is for a Private Plan Change to support the development of 2000+ residential lots across 186 ha in Lincoln, to the south of the township.

- The Private Plan Change requires amending the Selwyn District Planning Maps to rezone the site to Living X, Living Z and Business 1 (for the Local Centre). An Outline Development Plan (ODP) for South Lincoln has also been developed and is to be added to the ODP-Lincoln.

- The proposed site is an existing dairy farm of approx. 186 ha, and is adjacent to Te Whāriki subdivision and positioned on either side of Springs Rd. There are no known NZAA Māori sites in the immediate area.

- There are numerous waterways adjacent to and running through the site. This includes the Western Boundary Drain (an ephemeral waterway) and the Ararira (LII) River, which define the western and eastern boundaries of the site. Additionally, the spring-fed Lincoln Main Drain crosses through the site and Springs Creek (a spring-fed tributary of the Ararira) has headwater springs within the site.

- The Preliminary Site Investigation (PSI) identified that some areas of the site had experienced HAIL activity. This includes a high risk of adverse effects to underlying soil and groundwater as a result of a known offal pit/farm dump, and a moderate risk as a result of the use/storage of agrochemicals, farm related chemicals, and bulk petrol storage.

- The site includes Class 1, 2 and 4 soils. As Class 1-3 soils are considered 'versatile' soils, there is an issue regarding whether it is appropriate to develop these soils for residential purposes.

- Most of the site consists of poorly drained soils and relatively high groundwater levels. Existing drains within the site may be diverted to maximise the opportunity for developing the land. Therefore, two Stormwater Management Areas (SMA) are proposed for the downslope at the end of each catchment to provide stormwater treatment and attenuation. They will consist of:
    - A first flush basin (first 20mm of rainfall)
    - A wetland with the capacity to provide water quality polishing in rainfall events up to the first flush depth of 20mm, and provide live storage in large rainfall events exceeding the 20% AEP event
    - A detention basin to provide water quantity attenuation in large rainfall events greater than the first flush event but up to the 2% AEP.
    - After treatment and attenuation, the stormwater will be discharged into the Ararira to the east and an existing private drain to the west.

- Due to the flood risk in particular areas of the site, certain lots will be constructed so that the ground levels are set above road levels. This will enable the roads to act as secondary flow paths.

- The majority of new sites will be serviced by a gravity sewer network discharging to 2 new pump stations located to the western and eastern margins of the site. The lots that cannot be serviced by gravity sewer will utilise Local Pressure Sewer to discharge into the gravity network. A third pump station may be required to service the north-eastern portion of the site north of Springs Creek.

- Four recreation serves will be created throughout the ODP area, alongside green links and general reserves. This includes the possibility of a 20m wide cycleway along Spring Creek. The applicant has stated that the proposed reserve network may provide an opportunity to create an ecological corridor. These reserves would include indigenous trees and shrubs.

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## Evaluation in relation to Mahaanui Iwi Management Plan (MIMP)

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

**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.

**P6.1** To require on-site solutions to stormwater management in all new urban, commercial, industrial and rural developments (zero stormwater discharge off site) based on a multi-tiered approach to stormwater management:

(a) Education - engaging greater general public awareness of stormwater and its interaction with the natural environment, encouraging them to take steps to protect their local environment and perhaps re-use stormwater where appropriate;

(b) Reducing volume entering system - implementing measures that reduce the volume of stormwater requiring treatment (e.g. rainwater collection tanks);

(c) Reduce contaminants and sediments entering system - maximising opportunities to reduce contaminants entering stormwater e.g. oil collection pits in carparks, education of residents, treat the water, methods to improve quality; and

(d) Discharge to land-based methods, including swales, stormwater basins, retention basins, and constructed wetponds and wetlands (environmental infrastructure), using appropriate native plant species, recognising the ability of particulars species to absorb water and filter waste.

**P6.5** To encourage the design of stormwater management systems in urban and semi urban environments to provide for multiple uses: for example, stormwater management infrastructure as part of an open space network that provides for recreation, habitat and customary use values.

**P11.8** To require the planting of indigenous vegetation as an appropriate mitigation measure for adverse impacts that may be associated with earthworks activity.

**WM6.17** To require the development of stringent and enforceable controls on the following activities given the risk to water quality:

(b) Subdivision and development adjacent to waterways;

**WM13.7** To recognise the protection, establishment, and enhancement of riparian areas along waterways and lakes as a matter of regional importance, and a priority for Ngāi Tahu.

**CL3.8** To require, where a proposal is assessed by tāngata whenua as having the potential to affect wāhi tapu or wāhi taonga, one or more of the following:

(a) Low risk to sites:

(i) Accidental discovery protocol (ADP) - See Appendix 3 of the Mahaanui Iwi Management Plan.

(b) High risk to sites:

(i) Cultural Impact Assessment (CIA).

## Conclusion

This proposal was brought to Te Taumutu Rūnanga at a kaitiaki hui on Wednesday 16 December. Various comments and recommendations were made, and these are included below.

The Ngāi Tahu Subdivision and Development Guidelines (attached at the end of this document) provide a means of succinctly communicating a general series of principles for ngā rūnanga regarding development. They recognise that while subdivision and development can have adverse effects on rūnanga values, they can also provide opportunities to enhance those very values.

Due to the scale of the proposal, and the broader context of development throughout the Selwyn District, these development guidelines are incredibly important to understanding how adverse effects may be mitigated. Te Taumutu Rūnanga recognise that the developer in this sense has pre-empted some of these key concerns by proposing a 10m setback from all waterbodies, creating recreation reserves, remediating potentially contaminated land, and creating stormwater management areas.

As discussed in the Ngāi Tahu Subdivision and Development Guidelines, developers have the potential to incentivise homeowners to adopt more sustainable and self-sufficient approaches to water, waste and energy. This may include measures such as greywater systems and rainwater collection tanks. On a broader scale, as identified by the client, there are opportunities for the integration of stormwater collection, treatment and disposal in the open space reserves. The rūnanga agree that a more integrative approach to stormwater management is important to promoting sustainable development.

As referenced in the protection of waterways is a significant concern to the rūnanga. The 10m waterway setback is considered an appropriate mitigation measure when used in conjunction with naturalisation of the waterways and riparian planting of indigenous, locally sourced vegetation. However, the kaitiaki have queried the suitability of lots within the flood management area of the Ararira.

Although there are no known NZAA Māori sites identified within the proposed area, Lincoln is a significant area for the rūnanga and there is a potential for wāhi tapu/wāhi taonga to be discovered. An Accidental Discovery Protocol for all earthworks, is considered sufficient to protect cultural values across the site.

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## Recommendations

**Recommendation 1**

Indigenous planting is considered a critical mitigation measure for the large-scale development. This should be done with locally sourced vegetation, including naturalisation of the Lincoln Main Drain, Springs Creek, and other waterbodies.

**Recommendation 2**

A robust Erosion and Sediment Control Plan consistent with Environment Canterbury's Erosion and Sediment Control Guidelines. All contractors should be familiar with this.

**Recommendation 3**

The remediation of contaminated sites to minimise the risk of contaminant-laden stormwater entering waterbodies.

**Recommendation 4**

On-site stormwater control measures are considered an important facet of mitigating the effects of large-scale development. These are not only important in the context of the development as a whole, but also within each individual property. Rainwater tanks are one way through which stormwater management can be improved.

**Recommendation 5**

As noted above, the applicant has the capacity to require improved water efficiency throughout the subdivision. This may include incentivising homeowners to adopt green technology and sustainability initiatives.

**Recommendation 6**

The principles and policies identified in the Ngāi Tahu Subdivision and Development Guidelines should be incorporated into the development designs. These guidelines have been attached at the end of this document.

**Recommendation 7**

For all earthworks across the site, an Accidental Discovery Protocol consistent with Appendix 3 of the Mahaanui Iwi Management Plan is recommended. This is considered sufficient to protect any potential wāhi tapu/wāhi taonga values in the area.

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

**Report Prepared by:**

Helen Matunga

*Environmental Advisor*

**Peer Reviewed By:**

Brad Thomson

*Environmental Advisor*

## Appendix 1 : NGĀI TAHU SUBDIVISION AND DEVELOPMENT GUIDELINES

### Cultural landscapes

1 A cultural landscape approach is the most appropriate means to identify, assess and manage the potential effects of subdivision and development on cultural values and significant sites [refer Section 5.8 Issue CL1].
2 Subdivision and development that may impact on sites of significance is subject Ngāi Tahu policy on Wāhi tapu me wāhi taonga and Silent Files (Section 5.8, Issues CL3 and CL4).
3 Subdivision and development can provide opportunities to recognise Ngāi Tahu culture, history and identity associated with specific places, and affirm connections between tāngata whenua and place, including but not limited to:
   (i) Protecting and enhancing sites of cultural value, including waterways;
   (ii) Using traditional Ngāi Tahu names for street and neighborhood names, or name for developments;
   (iii) Use of indigenous species as street trees, in open space and reserves;
   (iv) Landscaping design that reflects cultural perspectives, ideas and materials;
   (v) Inclusion of interpretation materials, communicating the history and significance of places, resources and names to tāngata whenua; and
   (vi) Use of tāngata whenua inspired and designed artwork and structures.

### Stormwater

1 All new developments must have on-site solutions to stormwater management (i.e. zero stormwater discharge off site), based on a multi-tiered approach to stormwater management that utilises the natural ability of Papatūānuku to filter and cleanse stormwater and avoids the discharge of contaminated stormwater to water [refer to Section 5.4, Policy P6.1].
2 Stormwater swales, wetlands and retention basins are appropriate land based stormwater management options. These must be planted with native species (not left as grass) that are appropriate to the specific use, recognising the ability of particular species to absorb water and filter waste.
3 Stormwater management systems can be designed to provide for multiple uses. For example, stormwater management infrastructure as part of an open space network can provide amenity values, recreation, habitat for species that were once present on the site, and customary use.
4 Appropriate and effective measures must be identified and implemented to manage stormwater run off during the construction phase, given the high sediment loads that stormwater may carry as a result of vegetation clearance and bare land.
5 Councils should require the upgrade and integration of existing stormwater discharges as part of stormwater management on land rezoned for development.
6 Developers should strive to enhance existing water quality standards in the catchment downstream of developments, through improved stormwater management.

### Earthworks

1 Earthworks associated with subdivision and development are subject to the general policy on Earthworks (Section 5.4 Issue P11) and Wāhi tapu me wāhi taonga (Section 5.8, Issue CL3), including the specific methods used in high and low risk scenarios for accidental finds and damage to sites of significance.

2 The area of land cleared and left bare at any time during development should be kept to a minimum to reduce erosion, minimise stormwater run off and protect waterways from sedimentation.
3 Earthworks should not modify or damage beds and margins of waterways, except where such activity is for the purpose of naturalisation or enhancement.
4 Excess soil from sites should be used as much as possible on site, as opposed to moving it off site. Excess soil can be used to create relief in reserves or buffer zones.