

07 May 2021

To Trices Road Rezoning Group

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South Prebbleton – Private Plan Change 72

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 Ngāi Tūāhuriri Rūnanga and 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 proposed development is in accordance with an Outline Development Plan (ODP) and there is a proposed Council reserve (Birchs Road Reserve) to the south.
- The application states that it will preserve existing landscape features by creating a neighbourhood reserve around a group of well-established trees and maintain well-established plantings along Birchs Rd.
- A pocket park protecting a group of specimen trees off Trices Road will also be created.
- Stormwater Management Areas have been designed to serve a utility function and a recreation/open space function.
- There is no indigenous vegetation present on the site.
- The applicant has stated that there will be no discharges of contaminants into the environment.

- Wastewater will discharge to the Council's reticulated system and stormwater will discharge to onsite stormwater management and treatment areas.
- The site has been subject to HAIL activity.
- The applicant has stated that the proposal does not preclude individual landowners from installing rainwater collection and use from roof areas at the time of building development.
- A rising main would pump wastewater from this location westward along Hamptons Road, approximately 1.4km to the intersection of Hamptons and Springs Road and discharge into the SDC gravity sewer network at or near this intersection.
- This network drains to a new wastewater pump station recently installed at 612 Springs Road.
- A large, centrally located stormwater reserve/management area will be constructed for both utility and open space purposes.

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:

- (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 particular 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.

P7.3 To require waste minimisation as a basic principle of, and approach to, waste management. This means reducing the volume of waste entering the system through measures such as:

- (c) Incentives for existing and new homes, business, developments and council services to adopt greywater recycling and install low water use appliances; and
- (d) On site solutions to stormwater that avoid stormwater entering the wastewater system.

P11.1 To assess proposals for earthworks with particular regard to:

- (a) Potential effects on wāhi tapu and wāhi taonga, known and unknown;
- (b) Potential effects on waterways, wetlands and waipuna;
- (c) Potential effects on indigenous biodiversity;
- (d) Potential effects on natural landforms and features, including ridge lines;
- (e) Proposed erosion and sediment control measures; and
- (f) Rehabilitation and remediation plans following earthworks.

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

TM2.8 To require the integration of robust biodiversity objectives in urban, rural land use and planning, including but not limited to:

- (c) Use of indigenous species as street trees in residential developments, and in parks and reserves and other open space;

Conclusion

During their respective kaitiaki hui on the 5th and 7th May 2021, Te Taumutu Rūnanga and Te Ngāi Tūāhuriri Rūnanga assessed this proposal. Various recommendations were made, and these are discussed below.

The Ngāi Tahu Subdivision and Development Guidelines are important for understanding some of the general priorities for ngā rūnanga regarding development, and they provide detail on how these priorities may be addressed. While subdivision and development have the potential to adversely affect wāhi tapu/wāhi taonga and other cultural values, the rūnanga recognises that these activities can also provide opportunities for enhancement of these values. These guidelines have been attached at the end of this document and can also be found in the Mahaanui Iwi Management Plan.

As the applicant has discussed, stormwater management systems can be designed to provide for multiple uses. Ngā rūnanga strongly recommend this approach to stormwater management systems, with preferences for the infrastructure to operate as part of an open space network for species habitat, and amenity and recreational values.

Additionally, ngā rūnanga emphasise that new developments should adopt measures to minimise pressure on existing water resources and infrastructure. This may include incentives or requirements for low water use appliances and low flush toilets, grey water recycling and rainwater collection.

Recommendations

Recommendation 1

The inclusion of locally sourced indigenous planting in landscaping plans is an important mitigation measure for a subdivision development like this one. This includes street trees and landscaping, which may include indigenous species like *Plagianthus regius*.

Recommendation 2

A robust Erosion and Sediment Control Plan should be constructed, inspected, and maintained in accordance with ECan's Erosion and Sediment Control Toolbox for Canterbury.

Recommendation 3

The policies identified in the Ngāi Tahu Subdivision and Development Guidelines should be adhered to in the development designs, particularly regarding stormwater management, water supply and use (grey water recycling) and indigenous planting. These guidelines have been attached at the end of this document.

Recommendation 4

To protect any potential wāhi tapu/wāhi taonga values for the site, an Accidental Discovery Protocol consistent with Appendix 3 of the Mahaanui Iwi Management Plan is recommended for all earthworks. Even shallow soil disturbance has the potential to uncover culturally significant material.

Recommendation 5

Any contaminated areas on the site must be appropriately remediated prior to any further development.

Recommendation 6

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.

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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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.

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- 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.