Appendix J

Mahaanui Kurataiao Ltd Statement

Mahaanui Kurataiao Ltd

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

18th December 2020

To Rolleston West residential Limited

ATTN: Jeremy Phillips - Jeremy@novogroup.co.nz

Rolleston West Plan Change

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 mana whenua over the project's location, as it is within their takiwā:

- Te Ngāi Tūāhuriri Rūnanga and Taumutu Rūnanga.

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

Assessment of Proposal

- An Outline Development Plan has been developed to facilitate a proposed plan change.
- The land is currently zoned living 3.
- The total area of the proposed plan change is 160ha and will allow for an average density of 13.1 households/ha in a variety of lot sizes.
- There are no NZAA Māori sites or sites of cultural significance identified in the planning maps for this area.
    - District Planning maps are not precise indicators of Māori historical associations.

- The plan change area is comprised of two blocks. The Holmes Block will contain up to 1,150 properties and the Skellerup Block will contain up to 950 properties.
- These blocks currently have areas where housing density is restricted due to potential reverse sensitivity effects on existing nearby waste management activities which discharge odour.
- These activities are the Rolleston Wastewater Treatment Plant, Rolleston Resource Recovery Park, and Tegel Foods intensive poultry farming sheds.
- The plan change would require either the extension of existing infrastructure from neighbouring subdivisions or the provision of a new water supply and wastewater infrastructure to service the development areas.

Evaluation in relation to Mahaanui Iwi Management Plan (MIMP)

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

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.

Refer to guidelines attached as Appendix 1.

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.

P6.2 To oppose the use of existing natural waterways and wetlands, and drains, for the treatment and discharge of stormwater in both urban and rural environments.

Roof stormwater will be discharged to ground via soak pits. Treatment swales will be provided along road edges.

A detailed stormwater and wastewater design would be determined at the subdivision stage.

Stormwater discharge from hardstand areas such as roads and carparks should not be directed into waterways.

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 with earthworks activity.

Planting and reserves would be confirmed at the subdivision stage. Appropriate indigenous species should be used across the site.

WM13.1 To recognise and protect all wetlands, waipuna and riparian areas as wāhi taonga that provide important cultural and environment benefits, including but not limited to:

(a) Mahinga kai habitat;
(b) The provision of resources for cultural use;
(c) Cultural well-being;
(d) The maintenance and improvement of water quality; and
(e) Natural flood protection.

A water race crosses the site in the NW corner. This application states this would be realigned with the boundary.

A desktop ecological assessment of aquatic values has been carried out for both sites. It is considered likely the Holmes lot waterway contains Upland bully, Common bully, Brown trout and Shortfin eel. There are also potentially Kēkēwai present.

WM3.1 To advocate for the following order of priority for freshwater resource use, consistent with the Te Rūnanga o Ngāi Tahu Freshwater Policy Statement (1999):

(1) That the mauri of freshwater resources (ground and surface) is protected and sustained in order to:

(a) Protect instream values and uses (including indigenous flora and fauna);

(b) Meet the basic health and safety needs of humans, specifically the provision of an untreated and reliable supply of drinking water to marae and other communities; and

(c) Ensure the continuation of customary instream values and uses.

WM6.3 To require that clear and effective targets are established for restoring water quality in the takiwā, with immediate attention to:

(a) Lowland and coastal streams; and

(b) Groundwater.

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;

A minimum 10m buffer from all waterways is recommended.

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.

All riparian areas should be planted with locally sourced indigenous species.

CL3.3 To ensure that local and central government recognise that:

(a) Existing schedules and maps of cultural sites are not comprehensive nor exhaustive;

(b) Many sites and information about sites are held by whānau; and

(c) Protecting wāhi tapu and wāhi taonga requires effective working relationships with Papatipu Rūnanga.

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).

The lack of identified wāhi tapu and wāhi taonga does not diminish the importance of the area to mana whenua. NZAA sites are indicators only and not a complete record of all significant landscapes. An Accidental Discovery Protocol should be in place during all excavations.

Mahaanui
Kurataiao Ltd

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

Conclusion

The kaitiaki of both Taumutu and Te Ngāi Tūāhuriri Rūnanga are concerned about the proposed realignment of the water race running through Holmes block and the potential impacts on biodiversity and habitat. The kaitiaki oppose the realignment and infilling of waterways that could potentially hold at risk indigenous species.

Taumutu Rūnanga questioned the efficacy of a desktop ecological survey for determining species present in the waterway. The kaitiaki queried whether invertebrate species have been appropriately accounted for.

The kaitiaki also questioned the suitability of siting dwellings in a potential odour constrained area and recommended future development plans be informed by the Ngāi Tahu Subdivision and Development Guidelines (attached in Appendix One). These guidelines provide a framework by which the adverse effects of development on cultural values may be minimized or avoided.

The applicant could require improved water efficiency throughout the site at the subdivision stage. Efficiency measures including greywater systems and rainwater collection could be appropriately incentivised or required under the Outline Development Plan to lessen pressure on resources and wastewater infrastructure.

Recommendations

- The applicant avoids the infilling of the Holmes block waterway and provide a minimum 10m setback between all waterways and development.
- A landscape plan be prepared utilising indigenous planting that is locally sourced.
- All riparian areas should be planted with appropriate species to reduce contaminants reaching water.
- An on-site assessment of the fauna present in the waterways be carried out to determine species present.
- To avoid effects on wāhi tapu and wāhi taonga, an Accidental Discovery Protocol should be in place during all earthworks that is consistent with Appendix 3 of the Mahaanui Iwi Management Plan.
    - All contractors should be made familiar with this.
- Any future works on site should have appropriate sediment controls to prevent runoff reaching waterways that are consistent with Environment Canterbury's Erosion and Sediment Controls.

- Future subdivision should incorporate best practice onsite stormwater management controls to mitigate the effects of development and allow for stormwater infiltration.
    - Hardstand areas should be directed to detention ponds and swales to reduce runoff from site and allow for infiltration.
    - Stormwater discharge from roads and carparks should not be directed to waterways.
- The applicant should incorporate the recommendations from the **Ngai Tahu Subdivision Development Guidelines** in the development, particularly with regards to stormwater controls and indigenous plantings.
- Development should not occur within a recognised odour constrained 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:

Jemma Hardwick-Smith

Environmental Advisor

Peer reviewed and approved for release by:

Jason Eden

Environmental Advisor | Team Leader

Mahaanui Kurataiao Ltd

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

Appendix 1: Ngāi Tahu subdivision and development guidelines

Note: These guidelines are to be read in conjunction with Policies P4.1, P4.2 and P4.3

Cultural landscapes

1.1 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].

1.2 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).

1.3 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

2.1 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].

2.2 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.

2.3 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.

2.4 Appropriate and effective measures must be identified and implemented to manage stormwater runoff during the construction phase, given the high sediment loads that stormwater may carry as a result of vegetation clearance and bare land.

2.5 Councils should require the upgrade and integration of existing stormwater discharges as part of stormwater management on land rezoned for development.

2.6 Developers should strive to enhance existing water quality standards in the catchment downstream of developments, through improved stormwater management.

Earthworks

3.1 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.

3.2 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.

3.3 Earthworks should not modify or damage beds and margins of waterways, except where such activity is for the purpose of naturalisation or enhancement.

3.4 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.

Water supply and use

4.1 New developments should incorporate measures to minimise pressure on existing water resources, community water supplies and infrastructure, including incentives or requirements for:

(i) low water use appliances and low flush toilets;
(ii) grey water recycling; and
(iii) rainwater collection.

4.2 Where residential land development is proposed for an area with existing community water supply or infrastructure, the existing supply or infrastructure must be proven to be able to accommodate the increased population prior to the granting of subdivision consent.

4.3 Developments must recognise, and work to, existing limits on water supply. For example, where water supply is an issue, all new dwellings should be required to install rainwater collection systems.

Waste treatment and disposal

5.1 Developments should implement measures to reduce the volume of waste created within the development, including but not limited incentives or requirements for:

(i) Low water use appliances and low flush toilets;
(i) Grey water recycling; and
(ii) Recycling and composting opportunities (e.g. supporting zero waste principles).

5.2 Where a development is proposed for an area with existing wastewater infrastructure, the infrastructure must be proven to be able to accommodate the increased population prior to the granting of the subdivision consent.

5.3 New rural residential or lifestyle block developments should connect to a reticulated sewage network if available.

5.4 Where new wastewater infrastructure is required for a development:

(i) The preference is for community reticulated systems with local treatment and land based discharge rather than individual septic tanks; and
(ii) Where individual septic tanks are used, the preference is a wastewater treatment system rather than septic tanks.