

Before the Selwyn District Council

---

*under:* the Resource Management Act 1991

*in the matter of:* Proposed Private Plan Changes 81 and 82 to the  
Operative District Plan: Dunns Crossing Road, Rolleston

*and:* **Rolleston Industrial Developments Limited** and  
**Brookside Road Residential Limited**  
*Applicant*

Summary of Evidence of Victor Mthamo (Water Supply & Versatile  
Soils)

---

Dated: 12 September 2022

---

Reference: JM Appleyard (jo.appleyard@chapmantripp.com)  
LMN Forrester (lucy.forrester@chapmantripp.com)

chapmantripp.com  
T +64 4 499 5999  
F +64 4 472 7111

PO Box 993  
Wellington 6140  
New Zealand

Auckland  
Wellington  
Christchurch



## SUMMARY OF EVIDENCE OF VICTOR MTHAMO

- 1 My full name is Victor Mkurutsi Mthamo and I am a Principal Consultant for the environmental science, engineering and project management consultancy Reeftide Environmental and Projects Limited (Reeftide).
- 2 The PC81 and PC82 areas are able to be supplied with water using existing consents referenced in **Mr McLeod's** evidence. There is enough annual volume from the combined consents to meet the annual demand.
- 3 I estimated the minimum instantaneous flows at:
  - 3.1 23.1-26.4 L/s for the PC81 area; and
  - 3.2 87.1-99.7 L/s for the PC82 area.
- 4 I also assessed the existing consents and I found that:
  - 4.1 The consented takes have a combined maximum flow of 45.7 L/s.
  - 4.2 The available annual volume is 1,084,572 m<sup>3</sup>.
- 5 Using various SDC references I also estimated the required annual demand volume across the PC81 and PC82 area. This ranged from 420,590 m<sup>3</sup> and 609,550 m<sup>3</sup>.
- 6 I conclude that there is enough available consented water to meet the annual demand for the proposed plan change areas.
- 7 I also note that the combined instantaneous flows are greater than the maximum consented flow rate of 45.7 L/s. This would require amendment to the existing consents to increase the combined consented flow rate.
- 8 I do not see this as an issue as the applicant can apply for replacement consent(s) or variations to the existing consents to get higher flow rates to match the required instantaneous flows. These consents should be able to be granted:
  - 8.1 Provided the assessment of effects demonstrate that the drawdown effects on neighbouring wells is less than minor.
  - 8.2 As the water supply bores to be drilled in replacement of the existing ones would likely be deep (>100 m), I expect the effects on the neighbouring (within 2 km) shallow wells to be less than minor.

- 9 Currently SDC has a total consented volume for the Rolleston scheme of 7,183,440 m<sup>3</sup>/year. Over the last three years the average annual use has been 3,300,000 m<sup>3</sup>/year. The difference between the consented volume and the demand is 3.88 Mm<sup>3</sup>/year, which is a significant existing surplus.
- 10 I have suggested the option to use some of the Council's existing surplus water as a short-term measure. This appears to me to be an efficient use of the available supplies. The applicant would likely need to enter into a binding agreement with the Council to provide their share of the water at an agreed time.
- 11 In her Section 42A report, **Ms White** recommends a rule that will restrict subdivision until a water supply is provided. Given my opinion that potable water can be provided to the PC81 and PC82 areas, I do not see the need for the proposed rule. The Applicant should just be able to demonstrate at the subdivision stage that each stage submitted for subdivision consent can be supplied with potable water to meet the requirements.
- 12 I have also assessed the issue of versatile soils in response to the submission by Christchurch City Council and I concluded that there are no versatile soils in the proposed plan change areas.
- 13 In summary, I do not see why the proposal should not proceed on account of water supplies or soils.

#### **Rebuttal of Mr Langman's evidence**

- 14 In Paragraphs 115-118 Mr Langman discusses Policy 6.3.5 of the CRPS and notes that it *"seeks ensure that the nature, timing and sequencing of new development is co-ordinated with the development, funding, implementation and operation of transport and other infrastructure"*. He further notes in Paragraph 117 that the policy *"was drafted ensure that new development provides for appropriate infrastructure and that its provision should be real and demonstrable"*. In response to these comments:
  - 14.1 The approach by the applicant demonstrates compliance with Policy 6.3.5. The first step in the process is to seek rezoning of the site, this will be followed by the subdivision consenting and development processes. This takes time. I consider that the issue of water supply will be resolved by the time the development requires it.
  - 14.2 I have demonstrated that there is more than sufficient consented water available to meet the PC81 and PC82 water demands. This supply is real as it is currently available to the PC81 and PC82 areas.

15 In Paragraph 118 **Mr Langman** states that *"I do not agree that evidence merely demonstrating that feasible servicing options exist is sufficient, or that site specific upgrades can be made given the need to service a number of developments should further notified private plan changes be approved. Additionally, the upgrades have not been approved or consented"*. I make the following observations with regards to these statements:

15.1 **Mr Langman** seems to be contradicting what he has stated (in Paragraph 117) as the requirements set out in Policy 6.3.5.

15.2 He insists that not only should the applicant demonstrate the availability of adequate water supply (which I have done) or that the site can be serviced (which **Mr McLeod** has done) but the upgrades must be approved and consented. My question then is how can these be consented without the plan change? On what basis would the Council even consider such a request for upgrades or consents? This is a back to front approach which would be contrary to the timing and sequencing he so aptly attributed to Policy 6.3.5.

16 In Paragraph 119 **Mr Langman** writes *"Mr England concludes, in his Infrastructure Review Report for SDC, that deferral of land will be required until consented potable water can be made available.<sup>5</sup>....This does not give any certainty that the proposal can be delivered, in particular at pace"*. I respond as follows:

16.1 The applicant has accepted this deferral despite the fact I do not consider it necessary. And I do not agree that this does not give certainty the proposal can be delivered at pace. If that were to be the case it certainly would not be because of the lack of adequate water supply as there is more than adequate supply.

17 In his Paragraph 120 **Mr Langman** has misconstrued or not clearly read or understood my evidence when he states that *"However Mr Mthamo indicates that this will need to be supplemented by use of the existing capacity within the system in the short term."*:

17.1 No where in my evidence do I state that the PC81 and PC82 water demands will need to be supplemented by the use of the existing capacity within the system in the short term. As I noted above there is sufficient available consented capacity to more than meet the PC81 and PC82 requirements.

17.2 What I say in my evidence (Paragraphs 61-64) is that SDC has over 3.88 Mm<sup>3</sup>/year that is not being used. One option would be for this to be used first before the water available within the PC81 and 82 area is used. This is not

supplementing the water demands for the PC81 and PC82 areas but is an effort to use water more efficiently. The consents would be transferred to SDC but in terms of priority of use the existing unused water could be used first.

- 17.3 I only propose the above process as an option otherwise I do not see any reason why the developments would be hindered by water supply since there are existing consents that can be used. I consider it is clear that the proposed Plan Changes 81 and 82 are able to be supplied with adequate water supply to meet the development's and council's requirements.
- 18 In Paragraph 120 **Mr Langman** also expressed concern regarding the consentability of any changes to the consents and the possible impact of the Pines WWTP. In response:
- 18.1 Having prepared many consents over the years I am confident that this consent will be procedural.
- 18.2 The drawdown effects will be minor given the minimum depths (>100 m and up to >200 m) required for water take consents. The bores within 2 km of the site are primarily shallow bores and will unlikely be affected.
- 18.3 I should also note that any new bores to take water using the existing consents need not be within the PC81 and PC82 area. There can be installed anywhere within Rolleston. This means they can be located where the effects on neighbouring bore is less than minor or far enough from the Pines WWTP if that were to be a concern.
- 19 In response to Mr Langman's Paragraph 121 regarding water availability as a result of the introduction of the Living MD zone. I have calculated there is sufficient available consented volumes to meet (2,980-4,300 new properties in) the Living MD zone within the PC81 and PC82 areas.
- 20 In summary, I do not agree with the assertions made in **Mr Langman's** evidence regarding water supply.

Dated: 12 September 2022

---

Victor Mthamo