



**Mahaanui
Kurataiao Ltd**

Te Ngāi Tūāhuriri Rūnanga Position statement: Ōtūkaikino
Created: 03/05/2023
Approved: 08/06/2023

Introduction

Within the takiwā of Te Ngāi Tūāhuriri Rūnanga, Te Rūnanga hold tino rangatiratanga over the Ōtūkaikino catchment (Figure 1).

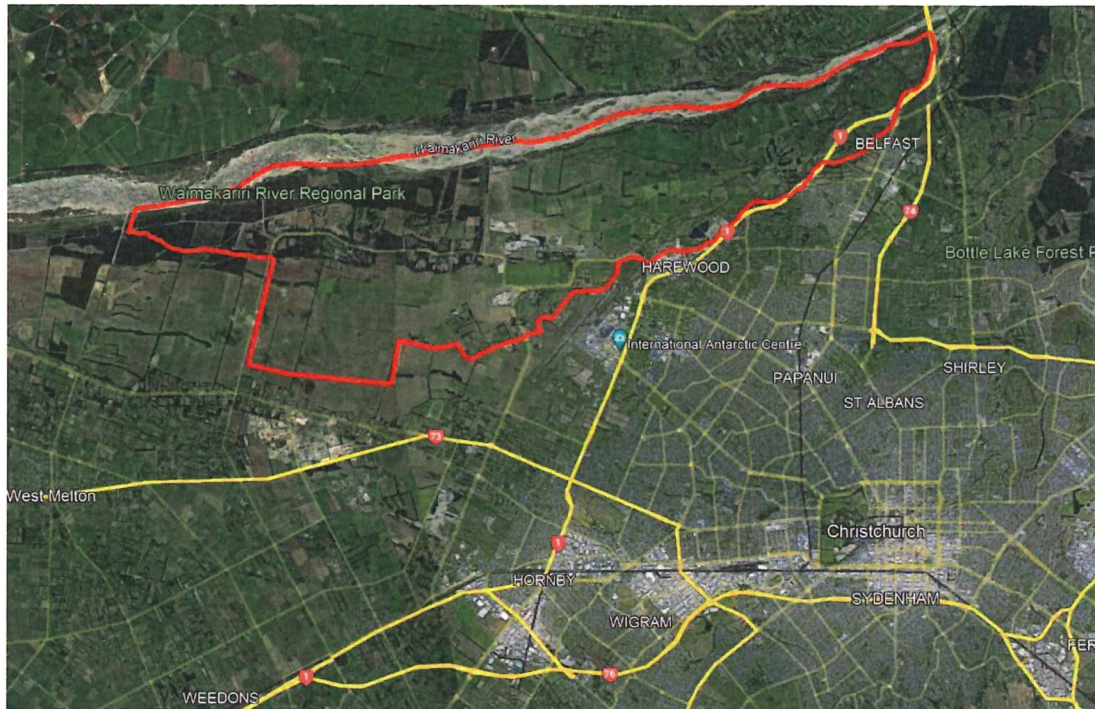


Figure 1. Ōtūkaikino catchment (outlined in red).

Christchurch City Council (CCC) holds the Comprehensive Stormwater Network Discharge Consent (CSNDC) to discharge water and contaminants to land and water from the CCC stormwater network (CRC214226). Condition 4 of this consent is that CCC are to consult with Papatipu Rūnanga to develop and update stormwater management plans (SMP). This statement responds to the Ōtūkaikino Stormwater Management Plan, which is the fourth of seven in development across the Christchurch District.

The purpose of the Ōtūkaikino Stormwater Management Plan includes the following:

- To meet existing and propose further reaching targets for lowering of contaminant discharge to stormwater and improving waterway health under the consent.
- To describe the ways in which stormwater discharges will be improved over time to meet environmental objectives.
- To create pathways to enhance mana whenua values through cessation and mitigation of detrimental effects and enhancing treatment and waterways to the highest possible standard.

In the recent Cultural Health monitoring undertaken in 2022, the average score from the monitored sites in the Ōtūkaikino catchment was 3.3. This score does not meet the Attribute Target Level for Mana Whenua Values of '5'.



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Position of mana whenua

Te Ngāi Tūāhuriri Rūnanga do not oppose the Ōtūkaikino Stormwater Management Plan, but have the following issues/concerns in conjunction with concerns raised in the 2022 State of Takiwā report:

Ngā Wai/Wai Māori – Freshwater

- CCC has identified a high level of zinc at on site (near the Omaka Scout Camp), and levels of dissolved copper above consent target levels. The 2022 State of Takiwā report by MKT identified concerning levels of phosphorous, *E. coli* and nitrate-nitrogen within the sites surveyed in this catchment.
- Fine sediment is a significant issue within the catchment, with several sites exhibiting sediment accumulation. This has been exacerbated through the lack of riparian planting at most sites and willow removal works downstream of the Groynes occurring at the time of the 2022 State of Takiwā monitoring.
- Current stormwater treatment methodologies are reliant on predominantly passive methods (e.g., rain gardens, stormwater basins). Rūnanga are concerned with the efficacy of these treatment methods when it comes to the removal of contaminants and the management of sediment build-up.
- Any discharge of untreated wastewater into the Ōtūkaikino catchment (including from the overflow site, Tyrone Street Pumping Station, and from private wastewater systems) is intolerable under the principles of kaitiakitanga and tikanga, and has a directly adverse impact on wai māori.
- Rūnanga are concerned that areas set aside for mitigation will not be sufficient for significant water quality improvement. Mana whenua want CCC to give serious consideration to the addition of other methods to compliment treatment (see Recommendation 13 below).
- It has been identified that stock access to the waterway may be a factor impacting water quality throughout the catchment, contributing to sedimentation and contamination. This is of particular concern around spring sites.

Taonga Species and Mahinga Kai

- Rūnanga are concerned that the water quality objectives stated in the CSNDC are not stringent enough to reduce containment levels within the Ōtūkaikino catchment.
- The lack of riparian plantings and as well as native and instream habitats throughout the catchment limits the ability for taonga species to recover within the catchment, and the ability for mana whenua to undertake mahinga kai practices, where appropriate.
- The Ōtūkaikino Stormwater Management Plan has identified that in-stream habitat conditions have grown worse over the time that CCC have been monitoring. In-stream habitats are key to the ongoing health and recovery of taonga species.



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Recommendations

To mitigate the concerns listed above, CCC will:

- 1) Engage with mana whenua prior to any proposed changes, enhancements, translocations and/or diversions rather than consult retrospectively.
- 2) Ensure mana whenua can implement their own management strategies (which include practices such as rāhui, or other customary tools), in keeping with treaty principles.
- 3) A catchment-based planting plan must be developed that ensures riparian margins are protected and provide sufficient habitat for taonga species. This should include removal of exotic pest species (e.g. blackberry, clematis, willows) to prevent indigenous planting being choked. These works must have stringent erosion and sediment controls in place during works to protect the awa.
- 4) Nitrate, phosphate, and *E. coli* levels within the catchment must be monitored regularly and the sources of this contamination be identified as soon as possible.
- 5) Pending results of *E. coli* investigation, appropriate measures must be implemented to reduce levels of contamination within the catchment. Further information on the source of the *E. coli* contamination and measures to reduce contamination must be discussed with Rūnanga through appropriate channels.
- 6) Sediment sources must be investigated throughout the catchment, and specific plans for planting be developed and enacted to mitigate erosion impacts in these areas. As mentioned above, any plantation works must have stringent erosion and sediment controls to protect the awa.
- 7) Council should investigate options to improve instream habitats. Measures to improve in-stream habitat must be discussed with Rūnanga through appropriate channels.
- 8) Mahinga kai sites should be developed throughout the catchment in conjunction with mana whenua, where culturally appropriate.
- 9) Ensure the protection and enhancement of known spring sites.
- 10) Where stormwater treatment facilities cannot be installed, ensure that stormwater is diverted into the wastewater system, especially in industrial areas.
- 11) Acknowledge that the mixing of human effluent (wastewater) and stormwater leading to discharge into the Ōtūkaikino is intolerable. Appropriate oversight of the installation and maintenance of private wastewater systems, and regular maintenance of the Tyrone Street Pumping Station must be undertaken to prevent overflow events.
- 12) Support regular State of the Takiwā reporting in the catchment.
- 13) Investigate the potential of denitrifying bioreactors to support nitrate conversion, specifically in areas where nitrate levels exceeded ANZECC guidelines, and shell bioreactors to assist with metal contamination reduction.



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- 14) Enact more stringent water quality guidelines in line with that of groundwater/drinking water, alongside monitoring of potential sources of contamination.
- 15) Ensure stringent erosion and sediment controls across the catchment, with particular regard for development in locations of LLUR sites.
- 16) Council must ensure that waterways are appropriately fenced and protected from stock where possible.

Te Ngāi Tūāhuriri Runanga reserve the right to oppose the proposal or pursue avoidance or mitigation of any subsequent impacts that are identified as a result of further site visits or further discussions with CCC.

X *H.M. Burgess*

Signed:

Date: 22-6-23

X

[Signature]

Signed

Date: 7-07-2023