



4 December 2023

Clutha District Council

1 Rosebank Terrace

P O Box 25

BALCLUTHA 9240

Tēnā koutou,

Submission on limited notified resource consent RM2893 – Coombe Hay Lane, Toko Mouth

Te Rūnanga o Ōtākou **opposes** this application.

Te Rūnanga o Ōtākou is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991 (RMA).

Te Rūnanga o Ōtākou will confirm whether it wishes to be heard at the hearing once further information relating to the concerns identified in this submission is received from the applicant.

Te Rūnanga o Ōtākou

Te Rūnanga o Ōtākou represents the raketira and are kaitiaki of natural resources within the area to which this application relates. The takiwā of Te Rūnanga o Ōtākou centres on Muaūpoko/Otago Peninsula and extends from Purehurehu Point/north of Heyward Point to the Clutha River/Mata-au River.

Application

Te Rūnanga o Ōtākou understand that consent is sought for an 18 Lot subdivision located at Coombe Hay Lane, Toko Mouth.

Decision Sought

Kāi Tahu submits that the application should **be declined** unless conditions are imposed to address the concerns set out in the reasons below.

Reason for the Decision Sought

Te Rūnanga o Ōtākou is concerned about the increasing number of subdivisions within their coastal takiwā. The encroachment and adverse effects of subdivision and development on sensitive environments such as the coast concerns mana whenua. When reviewing subdivision applications such as this, of particular concern to the Rūnanga, is the treatment of wastewater and stormwater, and the potential impacts on the receiving environment, including the cumulative impacts of residential infrastructure.

Wastewater

Mana whenua are concerned at the potential for adverse effects on the coastal environment which can arise from the installation of 18 individual onsite wastewater systems. It is the preference of Te Rūnanga o Ōtākou that the developer installs a reticulated wastewater and stormwater network. There is insufficient information provided in the application to enable Te Rūnanga o Ōtākou to fully assess the potential impacts of onsite wastewater management for each lot and the subdivision on the coastal environment. It is not acceptable to defer the details of wastewater management to the building consent stage. The Rūnanga does not believe that it is possible to say whether the discharge of wastewater to land complies with all the conditions for a permitted activity under the Regional Plan Water, as details relating to the design and location of the wastewater systems are not provided at this stage.

Stormwater

Te Rūnanga o Ōtākou has concerns regarding the pre and post development peak site runoff flow projections provided in Table 6.0 of the Onsite Wastewater Feasibility Assessment and Stormwater Management Plan¹. The Rūnanga would like more information regarding how these projections were calculated and whether those projections support the assertion that post-development flows will be no more than pre-development flows.

E noho ora mai

Address for Service

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¹ Appendix 9 of the AEE