

Canterbury Regional Council
Attention: Yvette Rodrigo
200 Tuam Street
Christchurch 8140
By email: Yvette.rodrido@ecan.govt.nz

Dear Yvette

CRC160056 –CSNDC SCOPE OF AMENDMENT TO APPLICATION

Thank you for your email dated 23 July 2018 describing the position of the Canterbury Regional Council (CRC) with regard to the amended CSNDC application and for sharing the legal advice to the CRC from Wynn Williams.

The CCC does not agree with the conclusion by the CRC that the amended application is outside the scope of the existing application and that a new application is necessary; however, for practical, pragmatic and risk avoidance reasons, the CCC does request that the CRC process the original application, along with the additional information provided to date, as a new application. CCC also requests public notification of the new application.

CCC also requests that the original application remain on hold to ensure the protection provided by section 124 of the Resource Management Act 1991 (RMA) following the expiry of existing resource consents held by CCC for the discharge of stormwater.

For your information, the CCC does not agree with the notion in the advice to the CRC that the inclusion of previously excluded sites from 1 January 2025, or upon expiry of CRC consents, whichever is the latest, results in different or new adverse effects. Sites that are excluded in the conditions in the 2016 application are still sites that, if consented separately by the CRC, are discharging into the CCC network and ultimately into the receiving environment being monitored under those conditions. The effects of all stormwater discharges on the receiving environment are taken account of within the assessment of effects provided in the original application. The management, mitigation and monitoring processes and structures required by those conditions applied to all discharges into and from the CCC network, including those that were separately consented by the CRC.

CCC also confirms that it does not intend to locate stormwater treatment systems on sites which are listed on the Listed Land Use Register (LLUR) or identified by CRC as being contaminated or having a high risk of being contaminated, and so the statements to this effect within the original application stand.

Yours sincerely



David Adamson
General Manager City Services