From:

To: <u>Hearings</u>

Subject: Re: Submission to CRC190445

Date: Friday, 31 August 2018 4:09:00 p.m.

Attachments: CRC160056 2016 -re-submitted 2018 -Jan Burney.pdf

Please find attached: CRC160056 2016 -re-submitted 2018 -Jan Burney

reference:

CRC160056 Comprehensive Stormwater Network Discharge Consent

You can either forward your original submission to CRC160056 as your base submission today, and add to it; or make a new submission in entirety. If you add to your original submission and your wish to be heard remains unchanged, the additional material can be accepted if it is received after the close of submissions today.

I wish to be heard

Please find a copy/paste of the submission, submitted to Ecan in 2016 CRC160056 - I wish to add additional material.

I will forward the additional material to Ecan by Monday 3rd September 2018

Ecan has required our resubmission as CCC consent has lapsed and they have put in a new consent.

If we do not re-submit our submission will not be heard or counted

I object to this process

We have not been heard on the original CRC160056 submission and the hearing was continually delayed.

I wish to add to the submission – submitted in 2016 - a copy is provided below.

I ask for a waiver to present further information as it has been 2 years since the original submission .

I ask for a waiver to add to this submission after the submission closing 5.00pm Friday 31 August 2018 - due to personal circumstances beyond my control and the Ecan web-site has not had the new consent information available for the past two weeks.

I propose to have the additional information to the submission to Ecan Monday 3rd September 2018 and would wish to have it read in it entirety.

Jan Burney

Hello Jan

I have been forwarded your email to Customer Services regarding the submission to the resource consent application CRC190445.

If you are unable to forward your submission by the end of today, please advise in your email/letter accompanying your late submission that you are applying for a waiver of timeframe to allow your late submission to be accepted. I am unable to grant a waiver prior to receiving the submission.

I note you advise that you wish to have your submission on application CRC160056 accepted as your submission to CRC190445. You also indicate that you wish to also make a separate submission.

Unfortunately we are unable to accept two separate submissions from one submitter to one application.

You can either forward your original submission to CRC160056 as your base submission today, and add to it; or make a new submission in entirety. If you add to your original submission and your wish to be heard remains unchanged, the additional material can be accepted if it is received after the close of submissions today.

Regards Alison Cooper **Consents Hearings**

Hearings

Environment Canterbury

Hearings@ecan.govt.nz

PO Box 345, Christchurch 8140 Customer Services: 0800 324 636

24 Hours: 0800 76 55 88



Application Details: Group Number:

244

Applicant Name:Jan Burney

CCC - Stormwater Network -1081

CRC160056_Comprehensive Stormwater Network Discharge Consent

I wish to be heard

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Submitter

Jan Burney

- 1. I see no budget or strategy from the Christchurch City Council in the Long Term Plan or City Plan for flood mitigation to alleviate adverse effects of the discharge onto to other properties or land and rivers that are potentially affected by this application.
- 2. No notification to personal addresses has been received about this application to properties that may be potentially affected by this application
- 3. No community meetings to aid understanding and inform communities has been undertaken by those presenting this application

- 4. The changes in the river flow, and flood banks from earthquake land damage have not been addressed nor has earthquake remedial work been carried to address issues out that could potentially create adverse effects to properties and communities
- 5. Concerns about pollutants, industrial pollution and the ecology and water quality of the river have not been conveyed to potential affected communities or the wider community of Christchurch/Canterbury
- 6. Increased flood risk has not been addressed in this application
- 7. On going aftershocks and earthquake land subsidence area wide has not been addressed in this application to investigate potential increased flood risk to existing communities and land/property owners
- 8. Requires investigation of potential sites that may be adversely affected and mitigation plan is required for; : /; (The allowance for back flooding over the wetland by 500 mm reduces the land area required for separate detention basins by at least 15 ha.)
- 9. Brooklands: No remedial work has been done to address the change and damage to the swale systems in Brooklands (ref The Integrated Catchment Management Plan for the Styx River/Purakaunui Area October 2012 p 28 page 36; Stormwater disposal for the very small existing urban areas in Styx West and Spencerville is via road-side swales which are considered to provide adequate treatment for the low density urban environment.)
- 10 . Brooklands:The statement (referenced) is incorrect and requires clarification upon the effects to the Brooklands community and property owners thus modelling will and effects will be in doubt as to the adverse effects upon this entire Brooklands community reference (ref The Integrated Catchment Management Plan for the Styx River/Purakaunui Area October 2012 p.36 Brooklands suffered substantial damage to land and buildings in the 2010 and 2011 earthquakes. The Christchurch Earthquake Recovery Authority (CERA) announced on 17 November 2011 that the final 417 dwellings in Brooklands were zoned red. This means that the entire suburb of Brooklands will be abandoned over the next several years. The small increase in the depths of flooding in the Brooklands Ponding Area above the Styx River floodgates anticipated during extreme events is, therefore considered acceptable in the Blueprint as the flood damage cost would be limited to rural land.
- 11. Brooklands: the `red zoning` is used to excuse flood mitigation to Brooklands community and no account/cost has been included to mitigate adverse effects to existing property and land owners and the community as a whole . (referenced) p 58 (ref The Integrated Catchment Management Plan for the Styx River/Purakaunui Area October 2012) 5.3 BROOKLANDS EARTHQUAKE REBUILD & FLOODING The September 4th 2010 earthquake and aftershocks had some dramatic effects in the Styx catchment in terms of disruption of piping infrastructure particularly sewerage and to a lesser extent surface water infrastructure and natural drainage channels. Severe damage to land, private properties and infrastructure was sustained at Brooklands. Surface Water Blueprint 58 31 August 2012 Version 6.6 The entire suburb of Brooklands has been zoned red and approximately 66 houses will require to be re-built in Spencerville. Severe damage to land was evident in the banks of the lower reaches of the Styx River where lateral spread opened up cracks as wide as 300 mm. Local drains showed the effects of liquefaction with grey silt or sand appearing and also there was evidence of the beds of streams being heaved upward as the banks moved inward toward the streams. This heave was most obvious in the constructed diversion on the lower Styx River right bank at approximately 1025 Lower Styx Road where the bed heaved about 500 mm. A similar effect

was observed in the exit drain from Wilsons Swamp (near Kainga) where the bed also heaved by approximately 500 mm and subsequently raised the water level in Wilsons Swamp. There is evidence that there has been general settlement of the land in the Brooklands area of approximately 200 mm. This has raised concerns about the vulnerability of the area to both storm and tidal flooding Initial repairs have been made to fill cracks and dig out heave in the beds of waterways to the point that most of the stormwater and other surface water systems are functioning, but further repairs are likely to be necessary before there is confidence that the system is robust is restored. Consideration is being given by CCC operational staff to reactivate the dredging programme for the lower reaches of the Styx river. Preliminary investigations have indicated that the cost of providing stopbanking and pumping protection for Brooklands settlement from a 1% AEP storm or tidal event would be likely to exceed \$6 million. This action is unlikely to be taken now that Brooklands has been zoned red.

12. The issue of modelling, earthquake damage, continuing aftershock and potential inaccurate decisions due to incorrect - outdated information is required to be addressed

Consent I wish the consent authority to make the following decision: (give details, including the general nature of any conditions sought) To withdraw this application until full notification and consultation has been given ,by those parties and (others) presenting this application and , - to potential affected property and land owners and -; until potential affected community consultation has been undertaken to allow discussion and submission of possible/potential concerns . Community wide and Canterbury wide consultation and information required upon River and water quality ,ecology, usage ,& groundwater , industrial pollutants - and mitigation of adverse effects of the proposal upon the rivers, land ,property and communities To provide budget and strategy that is available to comment/submit to and to have available for community and property, land owners

A copy should also be sent to the Applicant at: Christchurch City Council, PO Box 73014, Christchurch 8154 Attn: Graham Harrington or email:CSNDC@ccc.govt.nz

Submissions close at 5.00pm on Monday 29th February 2016

Signed:

Jan Burney 31 August 2018