

FORM520: SUBMISSION ON RESOURCE CONSENT APPLICATION

SECTION 95E RESOURCE MANAGEMENT ACT (RMA) 1991

TO: Consents Hearings
Environment Canterbury
PO Box 345
Christchurch 8140

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Ph: (03) 353 9007
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FOR OFFICE USE ONLY
Application No: CRC190445

Closing Date: 5.00pm, Friday 31 August
2018

TO: submit by completing an on-line form at:
<https://www.ecan.govt.nz/do-it-online/resource-consents/notifications-and-submissions/notified-consents/>.

A. PERSON(S) / GROUP / ORGANISATION MAKING SUBMISSION

The submitter is:

Full name of submitter: RAYMOND JOHN McGUIGAN / PAULINE FAY McGUIGAN

Postal address for Service: _____ Postcode: _____

Contact Phone: Private: _____ Work: _____ Cell: _____

Email Address: _____

Contact Person: Pauline McGuigan

Information about this resource consent process, including any details relating to a hearing may be sent via email

☐: - Please tick this box if you do not wish to receive communications via email.

Consent application number/s: CRC190445

Name of applicant: Christchurch City Council

1. ☐ I/We support the above application ☒ I/We oppose the above application
☐ I/We are neutral to the application (neither support or oppose)
2. The reasons for making my submission are: *(state in summary the nature of your submission, giving reasons)*

SEE ATTACHED SHEET

3. I wish the consent authority to make the following decision:

(give details, including the general nature of any conditions sought. Please attach additional pages if required)

SEE ATTACHED SHEET

4. ☒ I/we do wish to be heard in support of my/our submission*

(Note: this means you wish to speak in support of your submission at the hearing)

*If others make a similar submission, I will consider presenting a joint case with them at the hearing ☒ Yes ☐ No

- ☐ I/we do not wish to be heard in support of my/our submission

(Note: this means you cannot speak at the hearing, however you will retain your right to appeal any decision to the Environment Court on any decision made by the Council.)

5. ☐ I/we am a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I/we am/am not directly affected by an effect of the subject matter of the submission that

a) adversely affects the environment; and

b) does not relate to trade competition or the effects of trade competition.

Signature

Date 31-8-18

Notes to the submitter:

1. The person making this submission must send a copy to the applicant as soon as reasonably practicable after serving Environment Canterbury: Christchurch City Council Attn: Graham Harrington, Christchurch City Council, PO Box 73014, Christchurch 8154 or email CSNDC@ccc.govt.nz
2. A list of all submissions received will be provided to the applicant
3. Please be aware that third parties may request a copy of submissions received and that request is subject to the Local Government Official Information and Meetings Act 1987.

SUBMISSION TO ENVIRONMENT CANTERBURY 2018

PERSONAL DETAILS

RAYMOND JOHN MCGUIGAN & PAULINE FAY MCGUIGAN

ADDRESS;

Email:

CONSENT APPLICATION NUMBERS - CRC 160056 & CRC 190445

Name of applicant: CHRISTCHURCH CITY COUNCIL

1. We oppose the above mentioned applications being CRC160056 & CRC190445
2. The reasons for making our submission are noted below.

INTRODUCTION:

CRC 160056 – Application to discharge water and contaminants from the existing and future reticulated stormwater networks within Christchurch City Council boundaries and settlements of Banks Peninsula.

We opposed the above application on 29 February 2016 and completed a written submission stating we wished to be heard in support of our submission content.

Acceptance of our submission was received from Environment Canterbury - Submitter ID SUB031039.

For ease of reference I have stated below our reasons for our submission relevant to the application, CRC160056:

The application to discharge storm water from new developments within the Styx River catchment will create significant and greater adverse effects to the environment, communities and private properties. A 'cumulative' effect has created major issues for the existing property owners who live near the Styx River.

These adverse effects include, but are not limited to:

1/ Flooding risk

2/ Drainage matters (private and asset waterways)

3/ Water quality

4/ Wetlands causing a nuisance to the environment

5/ Stormwater design

The Styx River is unique and relies on flood/tidal gates to protect the 'lower reaches' from inundation with the Waimak River, requiring extra care with any mitigation proposals.

I wish the consent authority to make the following decision:

To Decline the application – alternatively should the application be granted the resource consent should be subject to conditions that adequately mitigate the adverse effects of the activity, including conditions that ensure flooding problems are remedied before a new discharge commences and that such flooding control to be remedied for the duration of the consent to discharge.

We requested that we be heard in support of our above submission

An application to vary the above mentioned application (CRC160056) was sought by the applicant.

Canterbury Regional Council concluded the variation was 'out of scope' and a new application was required. The new application no. is CRC190445

We have opposed this new application and have completed a written submission stating the reasons for our objection to this application (CRC190445).

2. The reasons for making our submission are:

The proposed activity to discharge storm water into the Styx River for the next 35 years will have an effect which we consider are 'more than minor.'

The adverse effects will include:

- Flooding with associated risks to the community, rural properties and homes
- Cumulative effects to the various drainage networks within the catchment
- Cumulative effect to the river water levels from developments/earthquake damage/maintenance operations/silt/proposed mitigation measures not completed/amendments to contributing tributaries within the catchment.
- Effects on private properties from developments.
- Loss of community amenities
- Identification of undeveloped land
- Inadequate monitoring systems
- Lack of effective community participation – Reference to SWIM/Styx Working Party
- Health & Environmental impact to private wells
- Storm water design and discharge within developments
- Acceptance of population/red zone as triggers to establish the Long term strategy and policy for Styx catchment

- Lack of transparency to the community - within the last 3 weeks the Styx river water levels have lowered significantly and the reasons for this are unclear.

3. We wish the consent authority to make the following decision:

To Decline the application, alternatively should the above mentioned applications, CRC160056 & CRC190445, be granted, the resource consents should be subject to conditions that adequately mitigate the adverse effects of the activity on the receiving environment and communities.

Conditions of the consent must reflect the mitigation measures necessary to remedy the adverse effects that have been recognised and accepted by the panel.

Any mitigation measures must be remedied before a new discharge commences and remain in force for the duration of the discharge consent.

4. We wish to be heard in support of the reasons stated above for our submission with regard to CRC190445.

CONCLUSION:

We are concerned information contained within the initial application, CRC160056, may be excluded from the panel's consideration and request that both applications, CRC160056 & CRC190445, with the relevant informing documents, be tabled at the hearing for the respected panel's consideration.

Both applications require the same consideration by the panel and it would be unreasonable to the community if the new application, CRC190445, made an assumption that the content of submissions for the application of CRC 160056 have been complied with and attended to.

We wish content from both our above mentioned submissions, CRC160056 & CRC190445, be accepted by the panel for their consideration.