

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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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:	Avon Rowing Club Incorporated (#219150)		
Postal address for Service:	PO Box 13115 , Armagh, Christchurch	Postcode:	8141
Contact Phone:	Private:	Work:	Cell: 02102713015
Email Address:	Manager@avonrowingclub.com , fred@do.nz		
Contact Person:	Jane Mountier		

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**

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

One of three rowing clubs training on the picturesque Kerr's Reach in Christchurch, the Avon Rowing Club has over 350 active members - men, women and school rowers. Avon has a number of rowers in New Zealand representative squads and has close ties to the local rowing regional performance centre.

Schools affiliated to Avon are Burnside High School, Marian College, Rangī Ruru, Shirley Boys High School, St Andrew's College, St Bede's College, St Margaret's College, St Thomas of Canterbury College, and Villa Maria College.

The Club has always traced its origins back to the formation of the "trades" rowing club in 1881, and its change of name to Avon in 1884. The Club has one of the longest histories of recreational use of the Otakaro Avon River.

This submission relates to the Christchurch City Council Comprehensive Stormwater Network Discharge Consent

application, which seeks resource consent for the discharge of network stormwater across the Christchurch City area as a non-complying activity.

The primary goals outlined by the application are defined by the *Christchurch Surfacewater Strategy, 2009 – 2039* (CCC, 2009, with these goals re-iterated in the application document, these are outlined for the purposes of our submission below:

1. *Improve the water quality of our surface water resources.*
2. *Reduce the adverse effects of flooding.*
3. *Improve the ecosystem health of surface water resources.*
4. *Restore Tangata Whenua values associated with surface water resources.*
5. *Support a range of recreation activities on and around waterways.*
6. *Protect heritage values associated with surface water.*
7. *Protect and enhance the landscape values of surface water.*
8. *Support community involvement in surface water management.*
9. *Manage stormwater in an efficient manner that supports Goals 1 to 8.*

The Club has reviewed the application made under CRC190445 and generally support the principle of the application with regard to the both surface water quality and surface water quantity outcomes as they accord to the goals outlined above, with particular regard to goals (1), (2), (3) and (5)

With regard to water quality, the use of the Otakaro Avon River is critical in the Club’s ongoing existence in the City at its Kerrs Reach location, allowing for athlete members to train in a location that is convenient and accessible.

A high level of water quality is important in ensuring the viability of the Kerrs Reach training location ongoing, for both the health and safety of athletes utilising the water resource and for ensuring the day to day operations of the club are able to continue at this location.

The applicant (being the Christchurch City Council) seeks to improve water quality within the Otakaro Avon River and as such the Club supports the outcomes sought by the application in this regard.

The Environmental Monitoring Programme proposed under the application is considered suitable in ensuring water quality outcomes are achieved for the duration of the consent.

The transition from the current interim consent (CRC090292) to the finalised Comprehensive Stormwater Network Discharge Consent is considered a positive progression in improving water quality in the Otakaro Avon River catchment and across the wider Christchurch City area.

In terms of water quantity the application seeks to ensure discharge flows are managed on site to ensure flows are attenuated where suitable to reduce stormwater pressures on the waterway. Whilst flood flows are not typically an issue for the Club these measures will ensure that the Clubs operations are not adversely affected by high rainfall events.

Overall the Club is supportive of the application in its current form.

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)

The Avon Rowing Club is satisfied that the consent be granted subject to the draft conditions submitted.

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.



31/08/2018

Signature T F Coughlan, Officer of the Avon Rowing Club Incorporated

Date

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.*