

SUBMISSION FOR THE CROWN ON AN APPLICATION FOR RESOURCE CONSENT BY THE CHRISTCHURCH CITY COUNCIL (CRC190445)

To: Consents Hearings, Environment Canterbury

Address: PO Box 345, Christchurch 8140

Email: Hearings@ecan.govt.nz

SUBMITTER DETAILS AND ADDRESS FOR SERVICE

Full name: The Deputy Chief Executive of Land Information New Zealand (LINZ) in the name of the Crown (Crown)

Postal address: Land Information New Zealand, Private Bag 4721, Christchurch 8140

Email address: JSheppard@linz.govt.nz

Phone number: 04 830 2595

Contact person: Jerome Sheppard, Deputy Chief Executive Crown Property

This submission relates to the Comprehensive Stormwater Network Discharge Consent application (CRC190445) by the Christchurch City Council (CCC) to discharge water and contaminants from the existing and future reticulated stormwater network.

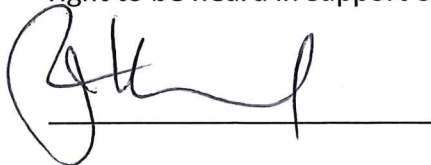
This submission relates to the parts of the resource consent application regarding the residential red zone land in the Ōtākaro/Avon River catchment.

TRADE COMPETITION

The Crown cannot gain an advantage in trade competition through this submission (for the purposes of section 308B of the Resource Management Act 1991).

HEARING

This submission is neutral regarding CCC's resource consent application. The Crown reserves its right to be heard in support of its submission.



Jerome Sheppard
Deputy Chief Executive of LINZ for and on behalf of the Crown

Dated: 31 August 2018

CONTEXT

- 1 This neutral submission is made for and on behalf of the Crown, by LINZ, reflecting its responsibilities under the Greater Christchurch Regeneration Act 2016 (GCR Act) for managing Crown-owned residential red zone (RRZ) land in greater Christchurch.
- 2 The Crown is committed to working collaboratively with CCC, stakeholders and the community to ensure the best outcomes for the regeneration of greater Christchurch.
- 3 Following the 2010-2011 Canterbury earthquakes and Crown zoning and offer processes, the Crown owns and manages a large amount of RRZ land in the Ōtākaro/Avon River Corridor. As such the Crown has a significant interest in any proposed land use activities for this area.
- 4 The Crown supports the general intention of the consent application to improve water quality and stormwater management across the city.
- 5 The purpose of making this neutral submission is to note some of the key considerations from the Crown's perspective regarding any use of Crown-owned RRZ land.

CONSIDERATIONS

- 6 It is important to be clear that no decisions have yet been made about future uses of RRZ land in the Ōtākaro/Avon River Corridor. This is the focus of the Regeneration Plan process currently underway, being led by Regenerate Christchurch, in accordance with the requirements set out in the GCR Act and the approved Outline. The Regeneration Plan process involves extensive community and stakeholder consultation, and provides an opportunity to weigh up the costs and benefits associated with various uses of the RRZ, and make informed decisions about the best possible uses.
- 7 Under the GCR Act, the Minister for Greater Christchurch Regeneration is the ultimate decision-maker on the draft Regeneration Plan. The Minister must not be constrained or impeded in making decisions about the draft Regeneration Plan.
- 8 Additionally, no decisions have been made about future ownership of Crown-owned RRZ land in the Ōtākaro/Avon River Corridor. Decisions will be subject to negotiations between the Crown and any potential future owners.
- 9 Accordingly, any plans for stormwater management cannot predetermine or constrain any potential future land uses for the RRZ, nor the Regeneration Plan process underway, nor any negotiations relating to land ownership.
- 10 CCC has indicated a preference for including treatment and detention devices in the RRZ to meet water quality and quantity objectives. CCC has noted, however, that the application is not dependent on the use of RRZ land, and that future land uses will not be impeded. Should a Regeneration Plan (if approved by the Minister) determine that there are better alternative uses of RRZ land, CCC would need to focus on alternative locations for these devices.

CONCLUSION

- 11 As CCC has noted that the consent application is not dependent on the use of RRZ land, and that future land uses would not be impeded, the Crown is neutral regarding the consent application. If consent is granted, the Crown seeks for the relevant documents to reflect the matters set out in this submission.