

Submission on CCC's Comprehensive Stormwater Network Discharge consent application (CRC190445)

To: Environment Canterbury
Address: PO Box 345
Christchurch 8140
Email: Hearings@ecan.govt.nz

Submitter: New Zealand Defence Force
Contact Person: Rebecca Davies, Senior Environmental Officer

Address for Service: New Zealand Defence Force
C/- Tonkin + Taylor
PO Box 2083
Wellington 6140

Phone: +64 21 445 482
Email: rebecca.davies@nzdf.mil.nz

Introduction and summary

1. This is a submission on the application for resource consent by Christchurch City Council for a Comprehensive Stormwater Network Discharge consent (CRC190445).
2. NZDF has a number of facilities within the Canterbury Region:
 - a. HMNZS Pegasus, Christchurch
 - b. RNZAF Museum, Wigram
 - c. West Melton Weapons Range
 - d. RNZAF Weedons Transmitter Facility
 - e. Burnham Army Camp
 - f. Glentunnel Depot
3. NZDF considers that the only sites to which the Comprehensive Stormwater Network Discharge Consent (CSNDC) may apply are the HMNZS Pegasus in Christchurch and the RNZAF Museum in Wigram. Stormwater from HMNZS Pegasus is discharged to the existing network, while stormwater from RNZAF Museum Wigram is discharged to land (authorised by existing resource consents from Environment Canterbury (ECan)).
4. NZDF are taking a neutral position on the resource consent application (as notified) on the basis that the assessment of the CSNDC application by ECan takes into account NZDFs existing activities and existing stormwater discharge consents. The rationale that underpins this is set out below.
5. NZDF **could not** gain an advantage in trade competition through this submission.

6. NZDF **does wish to be heard** in support of this submission.

Background

7. The scope of the CSNDC is to authorise the discharge of stormwater from the Christchurch City Council (CCC) stormwater network into land and water within the boundaries of CCC administered area. As noted above, this includes NZDF's HMNZS Pegasus and RNZAF Wigram Museum sites.
8. CCC has proposed a suite of draft consent conditions in its consent application. The proposed conditions include requirements for the consent holder (CCC) to prepare Stormwater Management Plans (SMPs) and use all "reasonable endeavours" to mitigate the effects of stormwater discharge within catchment areas.
9. The associated mitigations identified within the proposed draft conditions relate largely to methods associated with the development or redevelopment of sites or stormwater infrastructure.
10. NZDF's understanding is that those mitigation methods identified within either the comprehensive consent conditions or the SMPs are likely to apply to the future development or redevelopment of sites within the area covered by the CSNDC. This could include any development that NZDF might undertake at HMNZS Pegasus or RNZAF Wigram Museum in the future.
11. Nothing in the consent (as notified) would appear to place additional expectations upon property owners with existing connections into the reticulated system (such as HMNZS Pegasus), or those with existing consents from ECan to discharge stormwater to ground (such as RNZAF Wigram Museum). This understanding is the basis for NZDF's neutral submission.

RNZAF Museum, Wigram

12. The resource consent application report identifies (on Page 142) that commercial and industrial sites that bypass the CCC's network and discharge stormwater directly to ground (excluding roof stormwater to ground) or directly to waterways are not covered by the CSNDC. Draft proposed Condition 1 supports this, as it only includes stormwater discharges to land emanating from hard-standing areas of residential sites, greenfield development and re-development sites within the scope of the consent (i.e. commercial and industrial sites are not included).
13. On this basis, NZDF understands that much of the stormwater generated from the Wigram site that is discharged directly to ground is excluded from the scope of the comprehensive consent. In line with proposed draft Condition (1)(c) the CSNDC will still capture the stormwater being discharged to ground which emanates from the roofed areas on this site.
14. NZDF holds existing stormwater discharge consents from Environment Canterbury to discharge stormwater to ground via soakpits at its RNZAF Museum site.
15. The granting of the CSNDC could result in a situation whereby the stormwater discharges originating from roofed areas at the Wigram site would be captured by both their site specific stormwater discharge consents and the CSNDC. CCC appear to address this overlap by providing for the exclusion of sites in Schedule 1 that "*operate under their own discharge consent with ECan*" (page 164 of the AEE). This schedule currently remains unpopulated, pending the site audit proposed by CCC

and ECan, however NZDF expect that the Wigram site will be listed in Schedule 1, in line with the guidance provided on page 164 of the AEE.

16. NZDF requests that sites operating under its own ECan discharge consent (such as RNZAF Wigram Museum) be listed in Schedule 1 at the time the consent is issued, to avoid the situation of sites being subject to both the CSNDC and their existing site-specific consents. Should this not occur NZDF remains of the opinion that its own site-specific stormwater consents will continue to apply to stormwater discharges from NZDF sites, and that these sites will not be subject to any provisions established through the CSNDC.
17. Providing that this matter is addressed in the assessment of the CCC application and in the development of any relevant CSNDC resource consent conditions, NZDF does not oppose CCC's application for the CSNDC.



Person authorised to sign
on behalf of New Zealand Defence Force

Date

31/08/18

