

BEFORE THE CANTERBURY REGIONAL COUNCIL

UNDER THE

Resource Management Act 1991

AND

IN THE MATTER

of application CRC190445 by the Christchurch City Council for a comprehensive resource consent to discharge stormwater from within the Christchurch City area and Banks Peninsula settlements on or into land, into water and into coastal environments

**REBUTTAL EVIDENCE OF
DR BELINDA ISOBEL MARGETTS FOR CHRISTCHURCH CITY COUNCIL**

Dated 30 October 2018

CHRISTCHURCH CITY COUNCIL
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INTRODUCTION

1. My full name is Belinda Isobel Margetts. I here provide rebuttal evidence for the Christchurch City Council (**Council**) in relation to the evidence of other experts on the Council's application for a comprehensive stormwater network discharge consent (**Application**).
2. My qualifications and experience are as stated in my evidence in chief dated 15 October 2018.
3. I again confirm that I have read and agree to comply with the Code of Conduct for expert witnesses contained in the Environment Court Practice Note (dated 1 December 2014). I confirm that the issues addressed in the statement of evidence are within my area of expertise. I have not knowingly omitted to consider facts or information that might alter or detract from the opinions expressed. The Council as my employer has agreed to me giving this evidence on its behalf.

EVIDENCE RESPONDED TO IN THIS REBUTTAL EVIDENCE

4. I here in part respond to the evidence of:
 - 4.1 New Zealand Steel Limited (Marcus Cameron); and
 - 4.2 Lyttelton Port Company Limited (Andrew Purves).

Marcus Cameron for New Zealand Steel Limited

5. Mr Cameron states in Paragraphs 9.1-9.3 of his evidence that there is an inappropriate narrow focus in the application on copper, zinc and Total Suspended Solids (**TSS**), and that other effects on receiving environments, such as habitat quality and temperature, are not addressed.
6. I acknowledge throughout my evidence that there are many effects on receiving environments. The Environmental Monitoring Programme includes the monitoring of many aspects of ecological health, including those mentioned by

Mr Cameron. However, as mentioned in my evidence within the 'Responses to the Receiving Environment within the Scope of the Stormwater Consent' section, many of these drivers are outside the scope of a stormwater consent. Therefore, triggers for responses to monitoring only pertain to the key stormwater contaminants of copper, lead, zinc and TSS.

7. I still consider this is an appropriate approach, and do not recommend any changes to the conditions or the EMP.

Andrew Purves for Lyttelton Port Company Limited

8. Mr Purves recommends amendments to Condition 46 in Paragraph 60 of his evidence. This condition pertains to the updating of Attribute Target Levels (ATL) in Schedules 3 to 5 in response to changes in relevant guideline levels. Mr Purves considers that these updates should only occur in response to changes to the standards within the Land and Water Regional Plan or the Regional Coastal Environment Plan. He states that this will "*allow any change in the values to be the subject of a public submission process so the science behind the new values can be tested as well as benefits and costs of any new associated rules*".
9. The applicant's approach has been to take a conservative view and use the most relevant guideline levels to determine potential effects on the receiving environment. I consider that Mr Purves suggested changes will result in a less conservative approach that may mean that potential effects are not adequately identified. Guideline updates will be carried out by experts in the field and in my experience there are opportunities to provide comment on these values throughout their development, although not in the formal planning framework of regional plan submissions.
10. As mentioned throughout my Evidence in Chief (e.g. at Paragraph 40), I also note that not meeting the ATL does not mean that an adverse effect on the receiving environment is occurring, just that the risk is higher. Therefore, responses to not meeting targets only instigates further investigations for the key stormwater contaminants of copper, lead, zinc and TSS in surface water, and *Escherichia coli*, copper, lead, zinc and TSS in groundwater. This may

include an assessment as to whether an adverse effect is actually occurring if necessary.

11. I still consider Condition 46 is an appropriate approach, and do not recommend any changes to the conditions or the EMP.

Dr Belinda Isobel Margetts

30 October 2018