

**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

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**EVIDENCE SUMMARY**

**DAVID PAGE ADAMSON FOR CHRISTCHURCH CITY COUNCIL**

**5 NOVEMBER 2018**

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**TABLED AT HEARING**

Application: ..*CRC 190445*.....

.....  
Date: .....*5/11/2018*.....

CHRISTCHURCH CITY COUNCIL  
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## INTRODUCTION

1. My name is David Page Adamson I here summarise key points of my evidence, highlighting areas of agreement and disagreement between my opinion and that expressed by, or on behalf of, submitters and in the s42A report.

## SUMMARY OF EVIDENCE

2. My evidence explains generally how the Council provides land drainage and stormwater services, so the people of Christchurch can undertake their normal lives in an environment where flood risk is managed appropriately, where flood risk is proactively reduced, and where stormwater is managed so that water quality within the natural waterways, within the city, is improved over time.
3. This application covers very complex issues that face the Christchurch and Banks Peninsula communities. The granting of this consent is core for Council. Council has invested significant time, effort and resources in the past to providing efficient and effective stormwater infrastructure and this application is designed to build on this significant, community investment.
4. This consent covers both stormwater, infrastructural measures and multi-faceted non-infrastructural initiatives, all designed to deliver the outcomes desired in regard to stormwater management, both quality and quantity wise. The consent also covers a significant monitoring, reporting and modelling regime that will enable all parties to track progress, in a very open and transparent way.
5. In preparing the application Council has worked very closely with key partners and has aligned around the common objectives particularly in relationship to those expressed through close engagement with Ngāi Tahu.
6. Council has in the past made significant investment on behalf of the community into its stormwater network, and its long-term plan clearly indicates significant future investment, both in operational and capital investment. This consent is a cornerstone to Council's strategic directions. The control of flooding and the improvement of the urban water quality are paramount to the people of

Christchurch. This application covers an optimised scenario that is plausible, realistic and deliverable.

7. Key objectives Council wishes to achieve through this consent are
  - 7.1 the consolidation of Council stormwater discharge consents into one omnibus consent;
  - 7.2 an integrated approach to the control of quantity and quality in regard to stormwater;
  - 7.3 delivering the aspirations of the community around both water quality and flood control;
  - 7.4 providing surety around those issues that are under Council control, while also providing clear guidance on where Council can provide influence with regard to particular stormwater quality; and
  - 7.5 developing an adaptive approach that will be responsive to changes over time.
  
8. My evidence also describes the key components of Council's application being:
  - 8.1 the balance between infrastructural solutions and non-infrastructural solutions;
  - 8.2 the dual purpose of infrastructural solutions with regard to both quality and quantity of stormwater;
  - 8.3 non-infrastructural solutions that can be modelled and provide significant benefits, if adopted universally with key partners;
  - 8.4 the need to provide good control at source, for both stormwater volume and stormwater pollutants;
  - 8.5 an optimised cost-effective mixture of solutions to one of Christchurch's most challenging problems;
  - 8.6 the need for a long duration consent;
  - 8.7 the integration over time of stormwater discharges from properties that are currently outside of Council's jurisdiction; and
  - 8.8 the need to balance desired outcomes with resources and funding, including the appropriately timed reviews of the stormwater management plans, which in my opinion should remain at 10 years.

9. Within my evidence I cover Council's position on several crucial matters arising from the process of this Application, submissions, or the s42A report. Particular points are:
- 9.1 I do not agree with the concept of a Technical Advisory Panel (TAP), determining the content of the Council's SMPs, as Council's approach in the past has ensured that the appropriate mix of specialists produced excellent SMPs, in an affordable and efficient manner;
  - 9.2 Resource implications, and cost/benefit assessments, make the Council's proposed standards for water quality and quantity matters far preferable to the alternatives;
  - 9.3 A consent duration of less than 25 years has a significantly adverse impact on the long term outcomes possible under this consent, especially when balanced against the significant investment committed by Council on behalf of its ratepayers; and
  - 9.4 As mentioned above SMPs should be reviewed on a 10 year basis, as proposed by Council, due to the relative resources required for their upgrade and the long response times in which the natural environment will take to respond.
10. As part of the Section 42A report there is discussion regarding "reasonable endeavours" versus "reasonably practicable measures". Reasonable endeavours was used in Council's previous stormwater consents covering the Styx and Southwest catchments. I however recognise that this is not often used in resource consent conditions and therefore are happy to support changing all reference to "reasonable endeavours" within the consent to "reasonably practicable measures."
11. Also incorporated within the Section 42A report was discussions regarding the ability to continue to exclude sites from Council's global stormwater consent. The success of this consent will be in some cases dependent on the utilisation of the right legislation in partnership between the Christchurch City Council and Environment Canterbury. I therefore am also happy to support the ability for the continued exclusion of high risk sites or the addition of new high risk sites into the schedule of excluded sites as proposed in the modified conditions.

12. Within the Section 42A officer's report there is reference to placing a fix numerical limit for TSS within the proposed condition 40. This is also supported by one of Council's expert witnesses but not supported by another of Council's expert witnesses. For clarity I wish to say that Council does not support a fix numerical limited due to the current gap of knowledge with regard to what that limit should be. This limit could vary from site to site given that each site could be distinctively different. If the limit was placed within the consent, this limit would need to be set conservatively and therefore potentially provide an out for any application. Potentially as knowledge grows this may become a more useful tool but I would signal that one limit would not fit all sites.
  
13. I have also provided rebuttal evidence, which covers my support for Council engaging with the Department of Conservation during the preparation of SMPs, due to their statutory and internal expertise in these matters.

**DAVID PAGE ADAMSON**

5 November 2018

