

**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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**FINAL RESPONSE OF THE CHRISTCHURCH CITY COUNCIL**

**10 MAY 2019**

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CHRISTCHURCH CITY COUNCIL  
PO BOX 73015  
Christchurch 8154  
Solicitor Acting: Brent Pizzey  
Tel 64-3-9415550  
*Brent.Pizzey@ccc.govt.nz*

## **MAY IT PLEASE THE COMMISSIONERS:**

1. Counsel here provides the final response of the Christchurch City Council authorised by the Commissioners' Minute of 6 May 2019.
2. The Council is surprised by the assertion by Mr Potts at paragraph 7 of his submission dated 8 May 2019. Mr Potts ought to know, from his role in this hearing as a neutral independent expert taking part in expert witness caucusing, signing joint expert statements and taking part in the evidence given at the resumed hearing, that the modelling used throughout this application:
  - 2.1 Was built before 2012<sup>1</sup> and therefore uses LIDAR that does not account for filling that may have occurred since then. That was apparent to the Commissioners from the evidence<sup>2</sup> and was acknowledged by Mr Potts in the First Joint Statement<sup>3</sup>;
  - 2.2 Models the effect of stormwater discharged by the Council and flooding from the lagoon. The maps do not account for water ponding effects that arise from rainfall onto earthquake lowered land with high groundwater;
  - 2.3 Does not account for the possibility of flood risk being aggravated by weed growth in excess of the "roughness" factor used in the calibrated model<sup>4</sup>.
3. These limitations were clearly explained again in counsel's memorandum dated 3 May 2019, referred to in paragraph 4 of the Commissioners' Minute of 6 May 2019.
4. Accordingly, Mr Potts' unfounded assertion at paragraph 7 of his submission illustrates that he has not read the Council's response of 3 May 2019 and has not refreshed his memory of prior evidence.

**BK Pizzey**

10 May 2019

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<sup>1</sup> Tom Parsons EIC para 98.2. Joint Statement #1 Page 3 regarding the Styx monitoring baseline year.

<sup>2</sup> Commissioners' Minute 6 May 2019 paragraph 6.

<sup>3</sup> Page 3.

<sup>4</sup> Joint statement #1 para 39.

BK Pizzey Response for the CCC 10/5/19