

## **Invitation to comment on draft consent conditions for the Papakāinga Development – Rāpaki, Christchurch by the Te Mahi Korowai Trust [LP13] under the COVID-19 Recovery (Fast-track Consenting) Act 2020**

### **Environment Canterbury**

Environment Canterbury considers the proposed conditions are generally satisfactory to address the effects of the consent sought – being a land-use consent from the Christchurch City Council.

However, as no additional information has been provided, and no applications have been made for any consents from Environment Canterbury, the previously raised concerns surrounding the following matters remain:

- Contaminated Land Status
- Construction-phase Stormwater Discharges
- Operational Stormwater Discharges
- Works in or Adjacent to a Water Body to Install Stormwater Outfall
- Sub-soil Drainage Water Take and Discharge

Furthermore, the need for the following additional resource consents under the Canterbury Land and Water Regional Plan remains uncertain:

1. Construction-phase Stormwater Discharge Permit
2. Operational Stormwater Discharge Permit
3. Works in or Adjacent to a Water Body to Install Stormwater Outfall
4. Sub-soil Drainage Water Permit (Take) and
5. Subsoil Drainage Water Discharge

Should the proposed activity occur without a necessary consent being obtained, those activities would be unauthorised under the Canterbury Land and Water Regional Plan.

As of 3 September 2020 the National Environmental Standard for Freshwater ('NES') also has effect. As assessment would be required under the NES as to whether the proposed works in or adjacent to a water body to install the stormwater outfall.

We only have two specific comments on the proposed conditions:

Condition 4 is problematic in its entirety. By merely seeking to prevent flows of muddy water, it appears to authorise the discharge of construction phase stormwater (as defined by the Canterbury Land and Water Regional Plan). As discussed previously we are uncertain whether the discharge is a permitted activity, whether it has been authorised by CCC under their global stormwater consent (CRC190445), or whether a discharge permit is required.

The reference in Condition 6 should be to the Canterbury Regional Air Plan rather than the Regional Air Plan.