

12. FURTHER SUBMISSIONS ON THE PROPOSED NATURAL RESOURCES REGIONAL PLAN (PNRRP)

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PURPOSE OF REPORT

1. The purpose of this report is to:
 - advise Councillors of the further submissions process for Chapters 4-8 of the PNRRP;
 - recommend that a set of further submissions (Attachment 2) be made; and
 - seek Council approval for these.

EXECUTIVE SUMMARY

2. The further submissions process allows the Council to support or oppose submissions made by other submitters. It does not allow for new submissions to be made. The process provides an opportunity for the Council to expand on, and/or clarify, issues covered in its original submission and to take a position on issues it has not previously submitted on. The recommended further submissions (Attachment 2) follow the same approach taken in the original submissions (outlined for each of the four PNRRP chapters in the "CCC Original Submission" section of Attachment 1). A summary of new issues, not identified in the original submissions, but for which further submissions are recommended, is also provided in Attachment 1.
3. In general, the approach taken has been to support sustainable environmental outcomes, while being mindful of the challenges involved in an urban setting (particularly with respect to water quality issues), and the Council's responsibility to provide efficient and cost-effective services within realistic targets and timeframes.
4. By making the recommended further submissions the Council increases the scope and range of issues it can debate through the PNRRP hearings process. This provides opportunities to present evidence on a wider range of issues e.g. avoiding duplication of effort, making compliance with PNRRP provisions achievable, and providing reasonable timeframes for the work required to meet the new provisions.
5. At the Council seminar (6 December) discussion arose over a proposed further submission in opposition to a Christchurch International Airport Ltd (CIAL) submission concerning the potential for wetlands within the vicinity of the airport. We believe that a pro forma submission will enable the Council to be involved in future discussions and not limit options for dealing with asset management issues in this area. Officers will work with the CIAL team to try and resolve issues prior to the NRRP hearings.

FINANCIAL AND LEGAL CONSIDERATIONS

6. Making further submissions is part of a process that should lead to greater certainty for asset-management planning and more efficient use of Council resources, thus allowing for an improved understanding of the financial implications for the Council.
7. A legal review of the original CCC submissions was carried out prior to these being submitted. As yet, owing to time constraints, a legal review has not been carried out on the further submissions. However, it should be possible to do this prior to lodging submissions with Environment Canterbury, and making adjustments as advised.
8. With amalgamation with BPDC, the CCC will become the successor for submissions made on behalf of BPDC. Prior to hearings on submissions, any conflicts between CCC and BPDC submissions will be identified and some submissions may need to be withdrawn (with Council approval).

STAFF RECOMMENDATION

It is recommended that the further submissions presented with this report (Attachment 2) be submitted on behalf of the Christchurch City Council.

BACKGROUND ON FURTHER SUBMISSIONS ON THE PROPOSED NATURAL RESOURCES REGIONAL PLAN (PNRRP)

9. A Council seminar was held on 25 October outlining the issues covered in PNRRP Chapters 4-8 which are of importance to the Council. At this seminar the proposed Groundwater Recharge Zones were discussed. There are strong indications that Environment Canterbury will deal with these issues separately as a Variation to the PNRRP. A further Council seminar has been scheduled for 7 March 2006 to cover this matter.
10. The first three chapters of the PNRRP were notified in June 2003, hearings have been held, and decisions are expected in early 2006. This report concerns only Chapters 4-8 which include:

Chapter 4: Water Quality
Chapter 5: Water Quantity
Chapter 6: Beds and margins of lakes and rivers
Chapter 7: Wetlands
Chapter 8: Soil conservation
11. These five chapters were publicly notified in July 2004 as Variation 1 to the PNRRP. CCC made submissions on these provisions, with submissions closing in December 2004.
12. A summary of submissions, including approximately 37,000 separate points, was publicly notified on 15 October 2005. A small team of staff has prepared further submissions on points raised by other submitters (Attachment 2). The period for making further submissions closes on 19 December 2005. It is expected that hearings will begin towards the end of 2006. A Councillor seminar has been programmed for 6 December to present information on the recommended further submissions.
13. Provision within the five PNRRP chapters cover a wide variety of subjects, as well as interacting with provisions in other regional and city planning documents. The main issues affecting CCC include provisions concerning statutes and definitions, sewage disposal, stormwater management, hazardous substances, contaminated land, closed landfills, water quality and supply, riparian and wetland management, soil conservation and forestry, land use, and financial contributions. A summary of issues covered in each chapter, points raised in CCC's original submissions, and new points raised in further submissions is provided in Attachment 1.
14. Preparation of further submissions has concentrated on ensuring the CCC had submitted on matters affecting Council operations and the management of the city's natural resources. Issues identified for further submissions fall into two areas: those where a further submission could clarify or emphasis the city's position; and those where issues were missed, or potential implications not fully understood in the original submission. In general the process showed the Council's original submission to be fairly robust.

OPTIONS

15. Two options are presented:
 - The Christchurch City Council makes further submissions (Attachment 2) on PNRRP Chapters 4-8
 - The Christchurch City Council does not makes further submissions