

Before the Independent Hearings Panel
At Christchurch City Council

Under the	Resource Management Act 1991 (RMA or Act)
In the matter of	proposed private plan change 23 (PC 23) to the Christchurch District Plan
And	LMM Investments 2012
	Applicant

Joint Witness Statement for STORMWATER and FLOODING

14 May 2026

Applicant's solicitor:

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**anderson
lloyd.**

Introduction

- 1 This Joint Witness Statement (JWS) responds to Minute 3 in relation to **stormwater** and **flooding**.
- 2 The caucusing took place on 14th May 2026, via teleconference.
- 3 Attendees at the caucusing were:
 - (a) Brian Norton – Christchurch City Council (BN)
 - (b) Andrew Hall – Davie Lovell-Smith on behalf of the applicant (AH)

Code of conduct

- 4 Although this is not an Environment Court hearing, in preparing this statement the experts have read and understood the Code of Conduct for Expert Witnesses included in the Environment Court Practice Note 2023 and agree to comply with it.

Areas of agreement

- 5 BN and AH agree that the Site can be serviced for stormwater treatment and storage in terms of the Council Global Consent CRC252424 by establishing new basins and wetlands on site and ensuring that compensatory volumes are fully considered.
- 6 BN and AH agree that the site is affected by Vertical Land Movement. Neither BN nor AH are experts in Vertical Land Movement but it is agreed that direct advice can be taken from GNS Scientist, Ian Hamling and Victoria University Research Fellow, Dr Jessie Kearse.
- 7 BN and AH agree that the future 1 in 200 year storm event flood level to be applied to the site is RL2.88 New Zealand Vertical Datum 2016. This level has been obtained from the Christchurch City Council Styx 2026 Flood Model. 1.2m of sea level rise was included in this model result. This level excludes Vertical Land Movement.
- 8 BN and AH agree that the minimum Finished Floor Level for habitable buildings within the site will be the greater of either:
 - (a) The flood level RL2.88 PLUS Vertical Land Movement PLUS 400mm freeboard. OR
 - (b) A suitable level above groundwater that will accommodate stormwater treatment and storage PLUS stormwater flow head PLUS a suitable freeboard in accordance with Council Standards.

- 9 BN and AH agree that the Flood Management Areas detailed in the District Plan will alter in the future based on updated modelling. There will not be any development in any High Hazard Management Area, any development in the Ponding Management Area will require any displaced floodwater to be compensated for and any development in the Flood Management Area will require a 400mm freeboard to the finished Floor Level.
- 10 BN and AH agree that the final design levels will need to be added to the Council's Flood Model at the time of subdivision consenting. Any rise in surrounding flood levels, greater than 20mm, would be considered unacceptable.
- 11 BN and AH agree that the amended ODP narrative wording recommended in BN's evidence and accepted on behalf of the applicant in the planning evidence of Mr Jonathan Clease align with the above agreed matters and ensure that flood mitigation is able to be appropriately considered as part of future subdivision consenting processes.
- 12 BN and AH agree that they are not experts in the flood effects of tsunami but recognise Mr Gary Teear as an expert and are both accepting of his direct advice.
- 13 BN and AH have considered the National Policy Statement for Natural Hazards (2025) and with specific reference to Policy 6, the natural hazard risk of flooding, including for 100 years of climate change, is moderate to low within the area of the site where development activities would take place. The risk would be considered low but for the fact that the flood model is assessed with a projected rainfall for the year 2100, not 2126.
- 14 BN and AH have read submissions relating to the stormwater and flooding and agree that there has been no expert evidence provided in support of these submissions.

Areas of partial agreement

- 15 BN and AH have no partial agreements or disagreements

Areas of disagreement

16 BN and AH have no disagreements

Dated this 14 May 2026



Brian Norton



Andrew Hall