Submission on Proposed
Canterbury Land and Water
Regional Plan

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm Friday 5 October 2012 to:
Freepost 1201 Proposed Canterbury Land and Water Regional Plan
Environment Canterbury
P O Box 345
Christchurch 8140

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Trade Competition

Pursuant to Clause 6 of Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:
   a) adversely affects the environment; and
   b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

☑ I could not gain an advantage in trade competition through this submission; or
☐ I could gain an advantage in trade competition through this submission.

If you have ticked this box please select one of the following:

☐ I am directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.
☐ I am not directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

Signature: __________________________ Date: 3rd October 2012
(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:
(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

☐ I do not wish to be heard in support of my submission; or
☑ I do wish to be heard in support of my submission; and if so,
☑ If others make a similar submission, I will consider presenting a joint case with them at the hearing.
<table>
<thead>
<tr>
<th>Section &amp; Page Number</th>
<th>Sub-section/ Point</th>
<th>Oppose/support (in part or full)</th>
<th>Reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Schedule 13 – Page 16-21</td>
<td>Surface water allocation regime</td>
<td>Support</td>
<td>I <strong>support</strong> the method by which the surface water allocation block is to be calculated. The use of <strong>average rates</strong> of abstraction recognises the fact that not all resource consents are exercised to their fullest. Neither are they always authorised to be exercised continuously. It is the total volume of water being abstracted from a surface water resource that it important. Use of the average rate (which is based on the actual volume of water permitted to be taken over a specified return period) more accurately reflects what is happening in practice. The “A” allocation block for the Pareora River has been calculated using the average rates of abstraction in that catchment. The surface water allocation regime refers to use of effective allocation “in the same way as set out for groundwater allocation zones in Schedule 13 below”. But there is no reference in the groundwater allocation regime about “effective” allocation.</td>
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<tr>
<td>Groundwater allocation regime</td>
<td>Support in part</td>
<td>I <strong>support in part</strong> the method by which the groundwater allocation block is to be calculated, but the method does not allow for an “effective” allocation. Effective allocation is recognition that not all resource consent to take groundwater are exercised to their fullest at any point in time. Schedule WQN16 of the NRRP defines “effective” allocation as being 85% of the annual volume allocated to each take, where the water permit is to take water for irrigation use, and 100% of the annual volume allocated to each take, where the water permit is for group drinking water supply, community drinking water supply, or any other use other than irrigation. The surface water allocation regime refers to use of effective allocation “in the same way as set out for groundwater allocation zones in Schedule 13 below”. But there is no reference in the groundwater allocation regime about “effective” allocation.</td>
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<td>Retain the use of average daily rates of abstraction to calculate surface water allocation blocks.</td>
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<td>Include a definition and method of determining “effective” allocation for groundwater in accordance with Schedule WQN16 of the NRRP</td>
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I support in part the groundwater allocation limits specified in sections 14.6.2 and 15.6.3 but request the inclusion of a "B" groundwater allocation block in sections 14.6.2 (Pareora GAZ), and 15.6.2 (all GAZ excluding Whitneys Creek).

Policies 13.4.4, 13.4.5 and 13.4.6 refer to the Ashburton groundwater allocation zone including a "B" allocation that has specifically been set aside for applicant who surrender surface water and/or stream depleting groundwater take for an equal or greater rate and volume than is sought, and the take is surrendered. A major consideration for these policies is that the surface water and hydraulically connected groundwater resources within the Ashburton Catchment are highly over allocated. Allowing the use of additional groundwater that is not hydraulically linked to the surface water resources is a logical move that will lead to an immediate improvement in residual surface water flows within that Catchment. In addition, because the policy will lead to an improvement in surface water flow, there is less need to retain groundwater to retain recharge to downstream springs etc.

The over-allocation of surface water resources within the Ashburton Catchment is not unique. The foothills catchment of the Pareora to Waihao Rivers are also considerably over-allocated. Policies within section 14.1.2 (Pareora catchment), 15.4, and the allocation limits set in 15.6.1 (surface water catchments) and 15.6.2 (groundwater allocation limits) will place severe hardship on many existing users who have until now been able to take water without minimum flow limitations. In many instances, these existing users will have no ability to use groundwater because of the existing groundwater allocation zone limits.

Include “B” allocation limits for the Hunters Hills catchments (Pareora to Waihao Rivers) to allow existing surface water and hydraulically connected groundwater consent holders to take the same or lesser rates and volumes from deeper groundwater upon surrendering of their existing consent(s).
For the Pareora River, table 1 of the Pareora Catchment Environmental Flow and Water Allocation Regional Plan states that after five years from the date the Plan becomes operative, the flow at which all abstraction must cease will increase from 300 l/s to 400 l/s, with 50% restrictions being increased from 400 l/s to 470 l/s. This change will reduce irrigation reliability on average to 89%, however this means a total cessation of irrigation for 23, 52 and 18 days in the 2008/09, 2009/10 and 2010/11 seasons respectively, with 79 days in the 1984/85 season and 49 days in the 2000/01 season. More importantly, the specified groundwater allocation zone is considered to be fully allocated, leaving existing users with no alternative water source.

An immediate improvement in surface flow can be achieved by allowing those existing abstractions from surface or hydraulically connected groundwater to take groundwater from the deeper aquifers located within the marine sequence of the Cannington gravels. The aquifer is known to be continuous and extensive between the Pareora and Waihao catchments and has been shown to be not hydraulically connected to the surface rivers of the Hunters Hills.