

Proposed Canterbury Land & Water Regional Plan

Sarah Dawson | Director, Planner
Summary of Planning Evidence



Presented on behalf of Meridian Energy Limited
Boffa Miskell Limited | February 2013

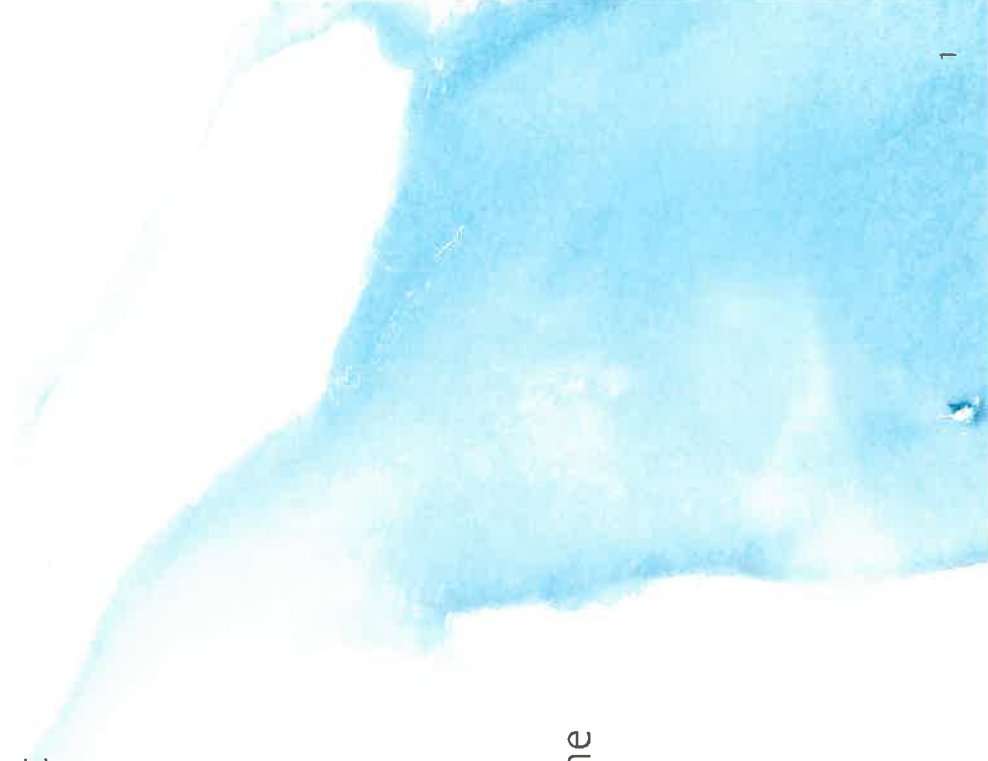
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Tabled at hearing 28/02/2013

The Existing Environment of the Waitaki Catchment

- Appropriately recognising existing activities in the formulation of RMA plans is good planning practice, and supports the achievement of sustainable management
- Existing activities influence the nature and tenor of resource management issues and the policy responses to address them
- Recognition of existing activities in regional plans is influenced by higher order planning documents (NPSREG and CRPS)
- In regional plans for the Waitaki catchment, it is appropriate to recognise the influence and dominance of the Waitaki Power Scheme
 - e.g.:
 - the physical presence of the Scheme;
 - practicalities of achieving outcomes for the lakes and rivers;
 - its significant contribution to social and economic wellbeing..



The Waitaki Catchment Water Allocation Regional Plan (WAP)

- WAP currently addresses the allocation of water to activities within the Waitaki catchment
- WAP was specifically promulgated to respond to the unique issues and circumstances of the Waitaki including:
 - the significance of the availability and use of water for the operation of the Waitaki Power Scheme
 - the existing effects of the Scheme on the natural and physical environment of the Waitaki
- WAP remains a current and appropriate basis for managing water allocation in the Waitaki catchment
- There is a clear intention to incorporate the WAP as a sub-regional chapter of the LWRP in the future



Relationship of the LWRP with the WAP

- The need for effective integrated resource management to occur across a region requires different regional plans are not inconsistent
- LWRP framework is likely to provide the foundation for the incorporation of the WAP, including catchment specific policies and rules
- Inconsistent and regionally generic framework of the LWRP when compared to the WAP may influence future management of the allocation of water in the Waitaki – e.g. Objective 3.21, Policy 4.4, Policy 4.48
- Degree of influence difficult to fully understand, as the LWRP framework being established in isolation from the incorporation of the WAP
- Risk that the importance, dominance and influence of the Waitaki Power Scheme will not be recognised when the WAP is incorporated

National and Regional Benefits of Waitaki Power Scheme

- LWRP does not adequately discuss, or explicitly provide for, issues, objectives, and policies relating to Waitaki Power Scheme as renewable electricity generation:
 - either as a significant issue for New Zealand as a whole, or
 - in Canterbury region
- Does not give appropriate effect to the NPSREG or CRPS (e.g. Objective 16.2.2, and Policies 16.3.3 and 16.3.5)
- Lack of recognition is compounded by aspirational and unachievable objectives relating to the protection, maintenance, and restoration of resources
- LWRP will not achieve an appropriate balance between the use/development and protection/maintenance of resources for renewable generation from the Waitaki Power Scheme

Incorporation of the WAP as a Sub-Regional Section of the LWRP

- Any Sub-Regional Section must implement the LWRP objectives, and is likely to be informed by LWRP policies.
- There is a need to ensure that LWRP provides an appropriate framework to guide the development of a Waitaki Sub-Regional Section
- Any Sub-Regional Section will most likely need to provide for:
 - the influence and dominance of the Waitaki Power Scheme, including its established environmental effects;
 - the national and regional significance of the Scheme, in a way that gives effect to the NPSRG and CRPS;
 - a more appropriate framework to achieve sustainable management in regard to the Scheme, than currently proposed in the LWRP.

Nature of Sub-Regional Provisions Required

- Provisions in the LWRP are needed to inform the development of a Sub-Regional Section for the Waitaki to:
 - Recognise the Waitaki Power Scheme as a significant user of freshwater in lakes / rivers in the catchment, and provide continued access to reliable water for hydro-electricity generation (e.g. new strategic policy, Appendix 1 of evidence);
 - Provide for the continuation of the activities of the Scheme, including maintenance, upgrading, and minor alteration (e.g. amendments to policy 4.48, Appendix 1 of evidence) ;
 - Provide for enhancements in the storage potential and generation output of the Scheme (e.g. new activity policy, pg 9 Appendix 1 of evidence);
 - Provide for the protection of the operation of the Scheme from other abstraction, and catchment water quality degradation (e.g. new abstraction policy, pg 8 Appendix 1 of evidence):

Priorities and Targets from the Canterbury Water Management Strategy

- Need to put the CWMS in its correct statutory context – have particular regard to visions and principles of CWMS when making decisions on submissions to LWRP.
- Any appropriate priorities and targets should be incorporated into the LWRP and subjected to full RMA process rather remain external to the plan – e.g. Objective 3.21, Policy 4.4
- ZIP outcomes including those which prioritise water use should be tested through RMA process and incorporated in sub-regional chapters – e.g. Policy 4.8

Protection of the Operation of the Waitaki Power Scheme Strategy

- Notwithstanding WAP, the LWRP manages water quality in the Waitaki catchment
- Protection of the operation of the Waitaki Power Scheme requires appropriate management of catchment water quality
- Amendments required to:
 - require no net increase in the loss of farm derived nitrogen;
 - capture the loss of phosphorus;
 - confirm the water quality classifications of hydro lakes.



Regulation of the Operation and Maintenance of the Waitaki Power Scheme

- LWRP will regulate activities relating to the operation and maintenance of the Scheme
- Amendments required to ensure provisions correspond with the level of environmental risk, avoid duplication of regulation, and ensure they are efficient and effective (e.g. amendments to rules 5.113 – 5.164, Appendix 1 of evidence)
- Little evidence of a need for further regulation of the Waitaki Power Scheme.