

Tabled at Hearing 27/02/2013



Submission to Proposed Canterbury Land and Water Regional Plan. February 2013.
Edward Snowdon: Submitter ID. 112

Section 4: Policies.

With respect to the following;

4.42 Any alteration to the level of any natural lake that is unmodified as at 11 August 2012 is within its natural range (averaged over not less than five years).

I consider the above clause has been inserted and worded to effect the raising of Lake Sumner by Hurunui Water Project limited.

If the wording is retained as above, then this will offer no protection whatsoever from a massively damaging development to a nationally and regionally significant water body of high naturalness.

HWP's proposal worked within the natural range of Lake Sumner.
The natural range is established by an early historic record as 3.1 meters.
HWP proposed the Lake be raised 2 meters for over 6 months of the year.
The damage would arise from the duration of the Lake raising.
Naturally a very high Lake Sumner (to the 2 meter or higher level) has occurred very rarely (1 in 10 years) and then only for a few hours, maximum days only.
These peaks flood the closely forested shores of Sumner and Katrine.
The delicate and special nature of the heavily forested shores of these lakes is well able to withstand inundation for short periods. However annoxia and erosion will kill all of a vegetated band of varying depth around 70% of the 32 km of shore line if inundated for a month or more. This has been well established, unopposed, in the Hur / Waiau Plan hearings. To carry this inundation out would be similar in nature to Lake Monowai (2.4 meters) or the proposed Manapouri raising.

Policy 4.42 appears to be at odds with both the **Objectives**:
First ten objectives in section 3, would be directly countered by policy 4.42

and **Rules**:

5. 131 The constructing of a new dam and the damming of water in the bed of a river or lake that results in the natural operating regime or level of a natural lake being altered is a non-complying activity.

Further more policy 4.42 runs directly counter to the **CWMS**;
No damming of the mainstems of the Alpine rivers.

And the original **NRRP**;

Damming on the mainstem of the Hurunui is a prohibited activity.

And the **WCO** granted to the North Branch of the Hurunui, but nullified by the Ecan Act

Therefore for any meaningful protection to Lake Sumner and Loch Katrine as high naturalness waterbodies, the duration is critical, probably more so than level.

Attached:

Photos of the first Lake Sumner flood in over ten years to reach the HWP run height (2 meters above historic low). This flood had a duration of about a day after which it would have largely cleared the level of vegetated shore.

Suggested addition to wording:

4.42 Any alteration to the level of any natural lake that is unmodified as at 11 August 2012 is within its natural range and duration (averaged over not less than five years).

Otherwise I request that clause 4.42 be removed from the policies all together so that it does not masquerade as protection, when it offers none. I believe this clause represents a cynical nod to the original NRRP intent, while holding out a disastrous development opportunity to HWP. I have no doubt that HWP approved of the current wording in behind-the-scenes horse trading.

Edward Snowdon

26/02/13

