

Submission on Variation 18 to the Proposed Natural Resources Regional Plan A

Full Name: _____

Organisation: Te Rūnanga o Arowhenua Trust, Te Rūnanga o Waihao and Te Rūnanga o Ngāi Tahu,

* the organisation that this submission is made on behalf of*

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Date: 3 September 2010

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Postal address for service of person making submission (if different from above):

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.

(Signature)

C (1) The specific provisions of the variation that my submission relates to are: (Specify page number and subsection numbering for each separate provision).

Support/
Oppose

(2) My submission is that: (State concisely: the nature of your submission, and clearly indicate whether you support or oppose each separate provision being submitted on, or wish to have amendments made, giving reasons).

(3) I seek the following decisions from Environment Canterbury: (Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns).

Variation 18 as a whole

This submission should be read in conjunction with the submissions that are to be lodged on the Pareora Catchment Environmental Flow and Allocation Regional Plan as this variation is meaningless unless the catchment specific plan progresses.

Delay the hearing of this variation until the Pareora Catchment Environmental Flow and Allocation Regional Plan

Further Ngāi Tahu seek that a commissioner with knowledge of Tangata Whenua values is appointed in respect of any hearing for this matter and/or that of the Pareora Catchment Plan.

Schedule WQN 17

All planning maps associated with the NRRP should be contained in one location which is Planning Maps Volume Part 1. By having Schedule WQN17 this could lead to confusion as

Remove Schedule WQN17 and incorporate Planning maps Map Volume Part 1 – Planning Maps; and all other consequential amendments required.



Environment Canterbury
Your regional council

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

- B**
- Tick this box if you do not wish to be heard in support of your submission;
 - Tick this box if you do wish to be heard in support of your submission; and,
 - Tick this box if you would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing.

Return your signed submission by **Friday 3 September 2010** to: Freepost 1201 Variation 18 to the Proposed Natural Resources Regional Plan Environment Canterbury P O Box 345 Christchurch Email: mailroom@ecan.govt.nz

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Schedule WQN 17 - Pareora Surface Water Allocation Zone & Pareora Groundwater Allocation Zone.	O	to what planning maps should be used within this catchment. Having two maps does not promote whole of catchment management. Further, the two maps have different boundaries for the surface water and groundwater allocation zones. This could lead to difficulties when implementing the plan. In particular when apportioning moderately connected groundwater (i.e. how much groundwater is allocated within surface water allocation and how much is allocated within the groundwater allocation. To avoid such difficulties, there should be one map showing the area to be covered by the Pareora River Plan).	Remove map named "Pareora Surface Water Allocation Zone" and Rename "Pareora Groundwater Allocation Zone" to Pareora River Catchment; and Amend the Key of the maps to read: "Upper Pareora River Catchment" Lower Pareora River Catchment" and all other consequential amended required
NRRP Chapter 5, Section 5.6 Regional Rules, page 5-124 by adding the following words to the end of the first sentence "or the activity and the catchment are listed below."	O	The main aim of the Pareora Catchment Plan is to ensure that the catchment is managed in an integrated fashion. This approach is supported as it is consent the Tangata Whenua philosophy for the management of natural resources of Ki uta ki tai (from the source to the sea) However, by not incorporating the existing Pareora Groundwater Zone into the Pareora Catchment Plan, and consequentially removing it from the NRRP it is impossible for the catchment as whole to be managed in an integrated fashion. Further, this could lead to difficulties when implementing the plan. In particular when apportioning moderately connected groundwater (i.e. how much groundwater is allocated within surface water allocation and how much is allocated within the groundwater allocation).	"Activities and Catchments not covered by Chapter 5 of the NRRP: (a) Within the area shown as the Pareora Catchment in Schedule WQN17, Map Volume Part 1 - Planning Maps the provisions of the Pareora Catchment Environmental Flow and Water Allocation Regional Plan shall apply to the taking, use, damming or diverting of surface water or groundwater, except where listed below. For other activities, the provisions in the NRRP apply. Exceptions Notwithstanding (a) above, the following provisions of Chapter 5 of the NRRP apply in all or part of the Pareora Catchment: - The NRRP Chapter 5 provisions apply to the taking or use of groundwater within that part of the Pareora Catchment shown as the "Pareora Groundwater Zone (NRRP)" in Schedule WQN17." and all other consequential amended required
Table WQN1: Relationship between existing regional plans and NRRP Chapter 5	O	The main aim of the Pareora Catchment Plan is to ensure that the catchment is managed in an integrated fashion. This approach is supported as it is consent the Tangata Whenua philosophy for the management of natural resources of Ki uta ki tai (from the source to the sea)	Amend Table WQN1 as follows: "Within the area shown as the Pareora Catchment in Schedule WQN17, Map Volume Part 1 - Planning Maps the provisions of Chapter 5 do not apply to the taking, use, damming or diverting of surface water or groundwater, except for the taking or use of groundwater within the area shown as the "Pareora Groundwater Zone (NRRP)" in

		<p>However, by not incorporating the existing Pareora Groundwater Zone into the Pareora Catchment Plan, and consequentially removing it from the NRRP it is impossible for the catchment as whole to be managed in an integrated fashion. Further, this could lead to difficulties when implementing the plan. In particular when apportioning moderately connected groundwater (i.e. how much groundwater is allocated within surface water allocation and how much is allocated within the groundwater allocation.</p>	<p>Schedule WQ417: Where any activity is expressly addressed in the Pareora Catchment Environmental Flow and Water Allocation Regional Plan the provisions in that plan apply within the Pareora Catchment, otherwise the NRRP applies." and all other consequential amended required</p>
Table WQL4: Relationship between existing regional plans and water conservation orders and the NRRP Chapter 4	S	<p>The table clearly articulates that all aspects associated with the taking of surface and groundwater within the Pareora River Catchment are managed by a separate plan</p>	Retain in its entity
Table BLR1: Relationship between existing regional plans and water conservation orders and NRRP Chapter 6	S	<p>The table clearly articulates that all aspects associated with the taking of surface and groundwater within the Pareora River Catchment are managed by a separate plan</p>	Retain in its entity
Table WTL1: Relationship between other plans and NRRP Chapter 7	S	<p>The table clearly articulates that all aspects associated with the taking of surface and groundwater within the Pareora River Catchment are managed by a separate plan</p>	Retain in its entity