

Submission on Proposed Pareora Catchment Environmental Flow and Water Allocation Regional Plan

**Environment Canterbury Regional Council**  
 Kaitiaki Takekōwhiri  
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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 1 October 2010**:  
 Freepost 1201  
 Proposed Pareora Catchment Environmental Flow and Water Allocation Regional Plan  
 Environment Canterbury  
 P O Box 345  
 Christchurch  
 Email: mailroom@ecan.govt.nz

**A**

Full Name: Keri Johnston Phone: 033088587 ext 2

Organisation: Incan Resource Solutions Phone: \_\_\_\_\_

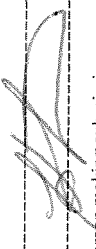
Postal Address: 1898 Geraldine Falls Hwy Fax: 033088994423

Date: 1 Sept 2010

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

email: kerijohnston@incan.co.nz

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

Signature: 

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

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

**C**

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

See attached

**(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.

FILE REF:	EC - CHCH
DOCUMENT No.:	PLAN-97ARE-19-6
	116556
	-6 SEP 2010
	Vivian Sanjaya
	INFO

EC 2754668 EC 274398

(2)

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(1) The specific provisions of the variation that my submission relates to are:

Policy 1.12, page 17  
Rule (2)(d)(ii)  
Table 1, page 26

(2) My submission is that:

The taking of water into storage is discouraged this way. Storage systems are set up in a manner where ponds are the central pumping points. This is best summarised as follows:

Water permit example:  
Take 100L/s into storage dam defined in condition (x) of this consent.

The taking of water into storage under this consent shall cease at the A permit minimum flow (being the same as for run of river irrigation).

Water taken from the storage dam defined in condition (x) of this consent shall be taken at a rate not exceeding 100L/s, with a volume not exceeding 8,640 cubic metres per day and 500,000 cubic metres between 1 July and the following 30 June.

The rationale behind having a higher minimum

(3) I seek the following decisions from Environment Canterbury:

Change Policy 1.12 to read (changes marked):  
To provide for water in the A Bock to be used either:

(a) A take to storage, provided that (i) the use of water for irrigation purposes is controlled from storage by Rule WQN25.  
(ii) Run of river water is not taken concurrently with water which is taken from storage.

Remove Rule (2)(d)(ii)(b) completely.

Remove column 4 in Table 1 (Minimum flow for takes to storage from the A permit allocation block).

flow for takes into storage is to ensure that the river is not at low flows for longer periods of time.

But, in fact, encouraging the taking of water into storage and using the storage as the central pumping point and controlling the use of water from storage for irrigation (Rule WQN25 PNRPP) benefits rivers as water is not taken at all if ponds are full , and it has been shown that rivers where consent holders have constructed on farm storage are in better shape than they have ever been (Taylors Stream, Mid Canterbury).

The way this is set up means having to have two take points, and this is excess infrastructure and cost, and will deter may consent holders from constructing storage when it should be encouraged.

Schedule 2

Only refers to Schedule WQN9v3 when there are now other approved methodologies for determining an appropriate annual volume.

Include reference to other methods such as Irricalc.