


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

**Group Name:** Pareora River Environmental Flow Review Steering Group

Group Members:	Representation
Alastair Midgley	Irrigator/Local Resident
Arnold Garchow	Recreational Interests
Bill Small	Pareora Hut-holder
David Henshaw	Irrigator/Local Resident
Glennys Douglass	Local Resident
Hamish Collins	Irrigator/Local Resident
John Keys	Local Resident
Judy Blakemore	Community Water Supply
Mark Webb	Ecological Interests
Martin Moore-Corry	Local Resident
Frank Scarf	Local Hydrologist
Richard De Joux	Local Hydrologist
Mandy Home	Te Runanga o Arowhenua

**Group Spokesperson:** Judy Blakemore  
**Contact Details:** 7 Gladstone rd, RD4 Timaru 7974

**Signature of Group Spokesperson:**  **Date:** 30/7/10

The Pareora River Environmental Flow Review Steering Group wishes to be heard in support of this submission

The Pareora River Environmental Flow Review Steering Group would be prepared to consider presenting this submission in a joint case with others making a similar submission at any hearing.

**Background to the formation of the Pareora River Environmental Flow Review Steering Group:**

The first public meeting of the Pareora Flow Review process was held in Southburn Hall on 22 November 2007, from this meeting a Community Advisory Group was formed to be involved in the flow review process. The group members were encouraged to participate in a series of meetings, discussions and presentations to share perspectives, knowledge and gain understanding on the range of values, processes and status of water within the catchment. Over time it became apparent that in order to progress through the range of information and to develop a community recommendation in relation to the review of environmental flow a smaller steering group would be more efficient. After consultation with all advisory group members it was agreed to form this steering group with 12 members representing the diverse range of interests within the community. As appropriate, additional people were involved in meetings and discussions. The first meeting of the Steering Group was held in July 2009.

The Pareora River Environmental Flow Review Steering Group has made a presentation to Environment Canterbury Councillors on 25<sup>th</sup> May 2010 outlining our recommendations for the review of the environmental flow of the Pareora River. We have also presented our perspectives on the proposed plan to a workshop for Environment Canterbury Commissioners on 2 July 2010.

The Pareora River Environmental Flow Review Steering Group recognises the significance of the Pareora River water to the local community. The real conflicts that occur between allocation of that water resource to out of river users (community water supplies, irrigation and industry) and retention of flow for riverine health, wildlife and recreational purposes, particularly during the summer months, are reasonable well understood by the group.

1) The specific provisions of the variation that our submission relates to are: Entire Plan	2) Our submission is that:  Pareora River Environmental Flow Review Steering Group (PREFRSG) supports the plan in principle. In doing so, it acknowledges that the river is highly allocated to abstractive use and that potential to increase minimum flow levels to what might be considered more desirable levels is limited. By restricting the granting of any new applications for consents to take from the river and its attendant groundwater, the Plan should arrest any further decline of riverine values, including in particular the incidence and duration of 'dry' riverbed occurrence throughout the river's lower reaches.  PREFRSG is not opposed to this rule but as there are no activities specified in Table 1 the current wording represents an error.  PREFRSG is not opposed to the policy allowing the transfer of consents from site to site but submits any such application should be deemed a restricted discretionary activity as opposed to controlled activity. Matters for discretion should, among other things, include a rigorous assessment that any impacts to the following should be less than minor: a) the local river environment and b) the status, exercise and reliability of other abstractive consents.	3) We seek the following decision from Environment Canterbury
Rule 2.3 (d) (iii) (a) & (d) (iv) (a) (Page 22)		Delete the words 'for that activity' from within Rule 2.3 (d) (iii) (a) & Rule 2.3 (d) (iv) (a)
Rule 9 – Controlled Activities – Rule 9.1 & 9.2 (page 25)		That all of Rule 9.1 and 9.2 should be deemed a restricted discretionary activity.
Rule 9 – Controlled Activities – Rule 9.3 (page 25)	Rule 9.3 is a non complying activity and therefore has to be renumbered.	That Rule 9.3 should be renumbered as Rule 10.1 with a heading 'Rule 10 – Non complying activity'

The Pareora River Environmental Flow Review Steering Group would like to highlight to council that during the discussions in developing a community recommendation and the formulation of this plan there has been consideration of Tangata Whenua values. This steering group acknowledges that many of the recommendations from the cultural assessment undertaken by Te Runanga o Arowhenua are outside the scope of this water allocation plan. Many issues identified are generic to the wider Canterbury region and are addressed within the NRRP. This steering group is keen to work through other processes to see recommendations from the cultural assessment implemented within the catchment.

The Pareora River Environmental Flow Review Steering Group would like to recommend to the council that all water take consents, affected by this plan, be reviewed as soon as the plan is made operative and before the commencement of the following irrigation season. This is anticipated to occur prior to the 2011/12 irrigation season and if so, it would coincide with the implementation of the National Standard for water metering. The principle matters for review are ensuring that conditions of all irrigation consent takes are brought into line where possible. The reasons for this are as follows:

- There are a few irrigation consents that are subject to low flow condition restrictions that are at variance with the remainder. The relevant conditions require minor amendment to align them with the remaining A Permit Allocation consent holders.
- Replace existing volumetric limitations, generally 7 day or 14 day restriction, with an annual volume limitation based on existing irrigation area and application of WQ9 or equivalent as the current disparity between volumetric limits is unsatisfactory.
- Additionally, PRPSG recognises in the interests of fairness among existing irrigation consent holders, that the taking of water for immediate irrigation needs should take priority over any diversion of water into on farm storage. Authority to divert water into storage using A Permit Allocation can only occur when flow at the Huts exceeds 1600 l/s (Table 1). That provision needs to be written into existing consents

We would also like to request that the costs of undertaking this review of the consents be borne by Environment Canterbury and not the individual consent holder.