



**PROPOSED PAREORA CATCHMENT ENVIRONMENTAL FLOW AND WATER ALLOCATION REGIONAL PLAN**

**SUBMISSION TO ENVIRONMENT CANTERBURY**

The specific provisions of the variation that my submission relates to are.	(1) My submission is that:	(2) I seek the following decisions from Environment Canterbury:
P8 Part 3 Fish	Brown trout are not found above the upper gorge dam	Add a sentence 'Trout are not found upstream of the dam in the upper gorge.'
P9 Part 3 Reference for Part 3	Include the references for the previous comment	Add reference: Sevicke-Jones G. 1998 Preliminary investigations of the Ecological Effect of Abstraction on the Pareora River. Report prepared for Timaru District Council.  Add reference: Sevicke-Jones G. 1999 Investigations of the Ecological Effect of Abstraction on the Pareora River. Report prepared for Timaru District Council.
P10 Part 4 Fish	The trout fishery is only below the dam in the upper gorge.	Add 'below the dam in the upper gorge' after 'The Pareora River' in the first sentence.
P22 Rule 2.2	The standard and term 'Fish shall be prevented from entering the water intake, by way of a fish exclusion device' is not the result of an objective or policy. It does not consider the type of fish at the intake.	Amend rule 2.2 by adding an additional matter to the list that the Canterbury Regional Council will restrict the exercise of its discretion to – • The reasonable need and practicality of a fish exclusion device.
P16 Policy 1.6 Damming of surface water	This policy is supported but not transferred into a rule for lawfully established existing dams.	Amend rule 2.2 by adding 'damming' ie 'The damming, taking, using or diverting....'
P22 Rule 2.2	Amend the rules to allow for existing dams.	Amend rule 2.2 by adding an additional

		<p>matter to the list that the Canterbury Regional Council will restrict the exercise of its discretion to –</p> <ul style="list-style-type: none"> <li>• The height of the existing dam may not be increased.</li> </ul>
<p>P18 Policy 1.14 To encourage discharge</p>	<p>TDC supports this policy and requests that the discharge of 70 l/s into the south branch of the Pareora River during the months of October and November becomes a permitted activity.</p> <p>The TDC pipeline is on this occasion being used as a conduit to ensure water reaches the lower Pareora River. The quality of the discharge is dictated by the quality of the water at the take.</p>	<p>Add Rule 1.2 The diverting of surface water for the purpose of increasing the flow within the lower Pareora River provided all the following conditions are complied with.</p> <ul style="list-style-type: none"> <li>(a) The water is released at a rate up to 70l/s</li> <li>(b) The water is released only during October and November</li> <li>(c) The discharge is carried out in a manner that minimises any changes in water quality.</li> </ul>
<p>Pg 22 Rule 2.2 bullet 2</p>	<p>TDC has concerns that discretion includes: ‘The availability and practicality of using alternative supplies of water.’ The TDC has extremely large infrastructure investments in the water supplies from the Pareora River and alternative sources, to enable the continued supply of water to Timaru in both normal and extreme conditions. Any reduction in reliability of water from the Pareora could have significant implications. TDC needs to ensure that industry is not restricted or shut down in extreme conditions. The use of the Pareora River water in conjunction with alternatives (currently</p>	<p>Delete ‘The availability and practicality of using alternative supplies of water’, from rule 2.2.</p>

	<p>Opihi) also provides a much greater window for taking water during freshes and floods, when it is common that one source provides water that is much more suitable to treat. The supply of water to Timaru alternates frequently between these sources and the use of either source is critical to providing safe drinking water for the urban area of Timaru.</p>	
<p>P22 Rule 2.2 bullet 4</p>	<p>TDC has concerns that discretion on 'The effects the take has on surface water flows, including floods and freshes' could also include low flows.</p> <p>Prior to obtaining the current consent the TDC did significant investigation into the low flow of the Pareora. The TDC offered to maintain a residual flow, reducing the reliability of the supply of water from the Pareora River.</p> <p>The PEFRSG has throughout its discussions determined that the TDC consent is important and should not have additional low flow restrictions. This should be excluded from discretion.</p>	<p>Amend wording to 'The effects the take has on surface water flows, including floods and freshes, but excluding low flows'.</p>
<p>P29 Definitions Rural and Township Water Supplies</p>	<p>The wording used throughout the plan is Community Water Supply. Rural and Township water supplies is not referred to in the plan.</p>	<p>Add definition 'Community Water Supply: Reticulated water supplies for domestic, industry and stockwater use, servicing rural, urban and rural-residential areas including all commercial and industrial premises and schools and other educational facilities located within the reticulated area, whether operated by a local authority or not.'</p>

			Remove definition 'Rural and Township water supplies'.
Pg1 Plan purpose and scope para 2	The wording should be consistently Community Water Supply		Delete 'drinking' from 'Community Drinking Water Supply'
P10 Part 4 Town and Community 1st para	The wording should be consistently Community Water Supply		Add 'water' to the first sentence between 'community' and 'supply'
P11 Part 4 Town and Community last para	The wording should be consistently Community Water Supply		Add 'water' between 'community' and 'supply'
P12 Part 5 Issue 1 1 <sup>st</sup> para	The wording should be consistently Community Water Supply		Change 'town supplies' to 'Community Water Supply'
P16 Policy 1.7 Explanation	The wording should be consistently Community Water Supply		Change 'community drinking water needs' to 'Community Water Supply needs'.
P16 Policy 1.7	The wording should be consistently Community Water Supply		Add 'water' between 'community' and 'supply'
P23 Rule 2.3	There are no activities in table 1 Rule 2.3d(iii)(a) and d(iv)(a) refer to 'that activity set out in Table 1'		Delete 'for that activity' from Rule 2.3d(iii)(a) and d(iv)(a)
P25 Rule 9.3	This rule is not controlled, it is non-complying		Add Rule 10 – Non complying Change Rule 9.3 to Rule 10.1