

013

1243013
13

SUBMISSION

Plan-Pareora-2P-6
EC167774

TO: E.Can
BY: Alastair Midgley

On The Proposed Pareora Catchment Environmental Flow and Water Allocation Plan.

1 October 2010

CONTACT: A. R. Midgley
380 Talbots Road
R.D. 2
Timaru
Phone: 03 612 6671
Cell: 027 476 8036

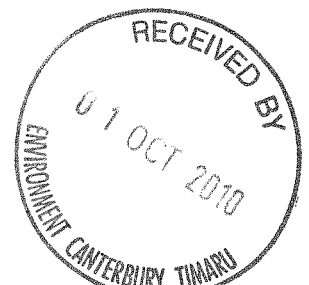
I thank E.Can for the opportunity to submit on the Pareora Catchment Environmental Flow and Water Allocation Regional Plan.

Introduction

1. I am a third generation Farmer having lived beside the River all my life. I have a good knowledge of the catchment and river having witnessed many changes over the years. Our family started irrigating in the 1960's and were granted the first irrigation consent in 1970.
2. The Pareora Irrigation Soc. Was formed in 1985 a drought year. At one of our meetings we were told by Frank Scott who was South Canterbury Catchment Board, Water Resource Manager at the time, that a management plan for the Pareora river was going to be produced in 1986.
3. At a regional water board standing tribunal meeting held in the Board room in Timaru on 29 April 1986.

Members Present: W. S. Peno (Chair)
J. T. F. Bull
G. T. Lill
L. R. Jenkins
A. S. Brown

- The Tribunal considered that a water and soil resource management plan was an important vehicle to ensure the adequate management of the Pareora water resource. The irrigation committee was also told the South Canterbury Catchment Board and the Regional Water Board was preparing such a plan for the Pareora river and in recognition that the water resources are already heavily committed to out of river use.
- This was in (1986) 24 years ago. The Tribunal suggested that it would be prudent to defer consideration of future water right applications until the management plan had been completed.



4. In spite of the knowledge of the Pareora river already being under threat C.R.C. continued to issue more consents on a regular basis, many not notified. Leo Fietje C.R.C. R.M.A. Regulatory Manager in the 1990's defended the issuing of these consents on the basis that they would have only minor effect. When questions about the accumulative effect of all these new takes he made the following Statement.

22 July 1998 Quote

It is acknowledged that the Pareora catchment is highly allocated. In future it is likely that any application to abstract water will be publicly notified.

5. Since this time 12 years ago CRC or Environment Canterbury has gone on issuing or altering existing consents to the detriment of the river environment and original consent holders.

Successive administrations of our water resources have shown disregard for the accumulative effect of over allocation.

6. **Support for Plan**

I have considered it a privilege to have been on the steering group that helped put this proposed plan together. I generally support the plan as the evidence of not having a plan has been disastrous for the river.

However I have some specific Submissions to make.

7. **Submissions**

Objective 5
Page 14

Policy 1.19
Page 18

Submission

- After having experienced 38 years on the river with no plans in place and poor administration of consents with regards to over allocation.
- I object to the statements of intentions to increase the minimum flows in 10 years time. Lets be happy to catch up on 35 years without setting perquisite conditions 10 years further out.
- As pointed out on page 5 of the proposed plan O'Donnell (2007) report the Canterbury Region will experience increased rainfall in the ranges and decreased rainfall on the plains. If it proves to be correct this prediction will have particular significance for foothills fed rivers including The Pareora.
- In ten years we may well find that there is less water to go around without some sort of augmentation.

- I support water storage but it has to stack up financially and if it was to be carried out on a large scale would probably also require augmentation to be reliable. I suggest this is a good subject to be addressed by the Canterbury Water Management Strategy and Zonal Committee.

Decision Sought

Where reference is made by Statement of intent to increase minimum flows in 10 years.

That this be deleted.

Reason

As the ability to review this already exists under R.M.A. Give time for the compository metering to build up some actual use data for up to at least 5 years.

Provision

Policy 1.13 Page 17

Explanation Page 17

I support Federated Farmer and Pareora Irrigators Collective Submission on Frost Protection and are apposed to specific mention of reviewing the minimum flow for frost protection when the plan is reviewed. The entire crops of Black Currants can be lost in one night without frost protection.

Decision Sought

Retain Policy 1.13

Delete the final sentence under explanation for the above reasons.

Policy 2.1
2.2

- I support these Policies as a cautious approach to the new development in the Cannington Basin and long term effects on the residual effects on the Lower Pareora River could be substantial.
- I also support conditions of consent CRC 990943.3 recently issued in the Cannington Basin.
- I would be concerned if some of the conditions of this new consent just issued were aligned to the plan when it becomes operative.

i.e.

1. 1. B. iii Max weekly volume 17.186cu m
2. Expiry date 27 August 2015.

Summary

When the proposed plan becomes operational it is important that consents are reviewed to be consistent with the plan as quickly as possible. This should be done at no cost to consent holders.

Thank you for the opportunity for making my submissions.

A. Midgley