

TO: Environment Canterbury
PO Box 345
CHRISTCHURCH 8140

**SUBMISSIONS ON PROPOSED WAIPARA CATCHMENT ENVIRONMENTAL FLOW AND
WATER ALLOCATION REGIONAL PLAN**

**Effect of National Policy Statement on Freshwater 2011 and Proposed Canterbury
Regional Policy Statement**

Name: Michael Harris

The Submissions of Michael Harris on the Proposed Waipara Catchment Environmental Flow and Water Allocation Regional Plan and the effect of the National Policy Statement on Freshwater 2011 and Proposed Canterbury Regional Policy Statement are set out below:

I am unfortunately unable to be present at the reconvened hearing to present these submissions.

I ask that these submissions be tabled and read at the reconvened hearing.

Reasons for submission

A submission on the Proposed Waipara Catchment Environmental Flow and Water Allocation Plan was made to Environment Canterbury in June 2010 with a further submission presented to the hearing in April 2011.

This submission is made with regard to the effects of the National Policy Statement on Freshwater 2011 and proposed Canterbury Regional Policy Statement on the Waipara Catchment Environmental Flow and Water Allocation Plan.

My submission generally relates to groundwater takes.

Submission

I have read the National Policy Statement on Freshwater 2011 and the Section 42A Report – Addendum #2 dated July 2011. I agree with the Section 42A Report Addendum #2 that the proposed Canterbury Regional Policy statement should be given low weight to this process as it is only in its very early stage in the RMA process.

National Policy Statement on Freshwater 2011

The National Policy Statement sets out the objectives and policies to manage water in an integrated and sustainable way while providing for economic growth within set water quality and quantity limits.

With regard to section B Water Quantity:

- Objective B1 safeguards the life-supporting capacity, ecosystem processes and indigenous species while sustainably managing the taking of fresh water – this objective needs to take into account local conditions where low summer flows are naturally present, where the mouth of the Waipara River is closed most of the time, and that the majority of the Waipara River catchment is unaffected by taking, using, damming or diverting of fresh water. These points were presented in submissions and discussed at the hearing. Objective B1 is supported within the objectives, policies and rules of the proposed Waipara Catchment Environmental Flow and Water Allocation Plan and no further amendments are required.
- Objective B2 is to avoid any further over-allocation of freshwater and to phase out existing over-allocation. With regard to groundwater, over-allocation is not present and is a non complying activity in the proposed rules.
- Objective B3 is to improve and maximise the efficient allocation and efficient use of water – this objective has been provided for in the objectives, policies and rules in the proposed Waipara Catchment Environmental Flow and Water Allocation Plan. Efficient allocation must also have regard to the manner in which consent applications are processed with respect to application costs, conditions of consent and duration. These should be appropriate and not unreasonable. Duration should not be unduly restricted.
- Objective B4 relates to wetlands and is provided for in the objectives, policies and rules of the proposed Waipara Catchment Environmental Flow and Water Allocation Plan.

The objectives B1 to B4 of the National Policy Statement on Freshwater 2011 have all been discussed in the submission and hearing process and are all adequately covered by the proposed Waipara Catchment Environmental Flow and Water Allocation Plan. No further amendments are required.

With regard to the policies in section B, these are all included within the policies within the proposed Waipara Catchment Environmental Flow and Water Allocation Plan.

Section 42A Report – Addendum #2

The Section 42A Report – Addendum #2 is reasonably succinct and generally concludes that there shouldn't be changes to the proposed Waipara Catchment Environmental Flow and Water Allocation Plan as already notified or recommended for changes in earlier Section 42A reports.

While there is a general concluding statement that some aspects of the proposed Waipara Catchment Environmental Flow and Water Allocation Plan could be strengthened with regard to the National Policy Statement on Freshwater, the Section 42A Report – Addendum #2 does not define what these changes should be in terms of changes to the wording of objectives, policies or rules in the proposed Waipara Catchment Environmental Flow and Water Allocation Plan.

As changes to the objectives, policies or rules were not included in the Section 42A Report – Addendum #2, and they should have been if there are changes proposed, and to promote a full and open process, any substantive changes proposed or made by the processing officer at the reconvened hearing should be fully circulated to all submitters (as they should have been in the Section 42A reporting).

I would be happy to discuss these submissions in more detail if it is so required.

Michael Harris
17 August 2011

Address for Service:
67a Hattaway Avenue
Bucklands Beach
Manukau 2012

Phone Contacts
DDI 09 525 9334
Mobile 0274 881516

