

From: wardnm@farmside.co.nz
To: [Mailroom Mailbox](#)
Cc: ["Haidee McCabe"](#)
Subject: Plan Change 7 to the LWRP Submission
Date: Thursday, 12 September 2019 3:38:41 PM
Attachments: [GWS Plan Change 7 Submission.pdf](#)

Please find attached a submission on Proposed Plan Change 7.

Kind regards

Nick Ward
Chairman
Geraldine Water Solutions

**SUBMISSION ON PROPOSED PLAN CHANGE 7 TO THE CANTERBURY LAND AND
WATER REGIONAL PLAN**

Clause 5 First Schedule, Resource Management Act 1991

TO: Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan
Environment Canterbury
PO Box 345
Christchurch 8140
By email: mailroom@ecan.govt.nz

Name of submitter:

1 Geraldine Water Solutions (GWS)

Address: c/ Nick Ward
693 Milford Clandeboye Road
RD 26
Temuka 7986

Contact: Nick Ward

Email: wardnm@farmside.co.nz

Trade competition statement:

2 GWS could not gain an advantage in trade competition through this submission.

Proposal this submission relates to is:

3 This submission is on proposed Plan Change 7 to the Canterbury Land and Water Regional Plan (PC7).

The specific provisions of PC7 that this submission relates to:

4 This submission relates to Part B of PC7 (Orari-Temuka-Opihi-Pareora sub-region component of PC7) in its entirety.

Wish to be Heard:

5 The GWS wishes to be heard in support of this submission.

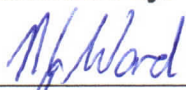
6 The GWS would be prepared to consider presenting a joint case with others making similar submissions at the hearing.

Background:

Geraldine Water Solutions (GWS) is a farmer initiated group, involved in the Orari, Waihi and Temuka catchments, that has contributed feedback during the consultation and formal feedback phases of the Zone Implementation Programme Addendum.

GWS is very concerned with decreasing allocation and increasing minimum flows, the impact on the reliability of supply for the Orari and Temuka River catchments without alternative water supplies. As a result, there must be time for change and a plan supportive of out of catchment water, considering the significance of the economic impacts on irrigators with the proposed flow regimes.

Authorized by:



Nick Ward - Geraldine Water Solutions

Date: 13 September 2019

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: (include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views.)		(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.)
Section & Page Number	Sub-section/ Point	Oppose /support (in part or full)	Reasons	
Section 14 – Orari Temuka Opihi Pareroa				Partial changes proposed are identified in bold
133	Policy 14.4.11	Support	This policy means those with alternative water supplies from schemes should be the primary source of water and prioritized over water from other water sources within the catchment. This has been included in other sub-catchment plans, and is supported as obtaining alternative water supplies should be encouraged and supported.	Support as notified.
134	Out of Catchment Water Policy 14.4.14	Support in part	<p>GWS is very concerned with decreasing allocation and increasing minimum flows, the reliability of supply for the Orari River with the operative plan (LWRP Section 14) and changes to the Temuka catchment through this current planning process. With such changes coming into force, it is essential existing water users have alternative water supplies.</p> <p>Through this plan process the Temuka River catchment is considering significant reduction in allocation and increasing minimum flows, which has a significant impact on farming operating profits. GWS is extremely supportive of the work being undertaken by the Temuka Catchment Working Party.</p> <p>Given the significant economic consequences, GWS insists that this plan is supportive of community water alternatives to provide solutions. Enabling of new water to be brought into the area from alpine sources to support existing irrigators who are impacted by reduced allocation and higher minimum flows. This is essential to sustain the financial viability of these</p>	<p>Support with the following clarification to the policy:</p> <p>14.4.14 When introducing water from outside the catchment <u>Orari-Temuka-Opihi-Pareora sub-region</u>, protect the values, customs and culture of papatipu rūnanga by:</p>

			<p>farmers and the surrounding local communities. If changes are to be made to existing flow regimes there must be time for change to new water sources.</p> <p>GWS are seeking that the plan enables efficient and effective irrigation with new sources of water and alternatives. The bigger picture must also be considered to ensure that not only new supply options are provided for, but the water quality and nutrient aspects are appropriate and enabling of irrigation in a sustainable and environmental manner.</p> <p>Enabling these irrigators to go to alternative water supplies, also has a positive environmental effect with reduced demand on these over-allocated catchments.</p> <p>However, the intended meaning and scope of the term “catchment” in Policy 14.4.14 is uncertain. Specifically, it is not clear whether the intention of Policy 14.4.14 is to address water introduced from outside the OTOP sub-zone (which TCWP believes is the intent of the Policy) or, for example, movement of water between the tributary catchments of larger catchments in the OTOP sub-zone. GWS considers Policy 14.4.14 requires amendment to ensure there is greater certainty around the intended scope and application of the Policy.</p> <p>GWS is supportive of the policy in general and the consultation requirements with Ngai Tahu, as this is an important and a sensitive matter, when bringing water from out of catchment. The policy ensures consultation occurs and matters are addressed.</p>	
137	Consent Reviews Policy 14.4.21	Oppose in part	<p>Given the Temuka and Orari FMU are over-allocated catchment where there must be strong mechanisms to reduce allocation, this policy is supported. However reference to immediate review should be removed, as this needs to be done in an effective and appropriate manner, than an immediate reaction and potentially related to changes in flow regimes in the associated tables. It is also crucial that alternative water supplies are able to be obtained to ensure reliability of supply is still acceptable to the irrigators.</p>	Delete: immediately after plan change 7 is made operative
139	Over-allocation	Oppose	<p>The duration of 2035 rather than 2040 is strongly opposed, as there must be time for change and alternative water to be sought and infrastructure put in</p>	Amend all policy reference to 2035 and replace with 2040

